

Matter 11 Infrastructure Provision and Viability

Issue 11 – Does the Plan set out a positively prepared strategy for infrastructure provision to meet the Plan’s development strategy and is this justified, effective and consistent with national policy? Are the policies relating to infrastructure sound? Is infrastructure provision viable?

Matter 11a Infrastructure – general questions

Infrastructure and Developer Contributions – Core Policy CP6

1. The policy seeks ‘to ensure that infrastructure will be in place at the right time to meet the needs of the District and to support the development strategy.’

a. The policy identifies the Council’s broad intentions in achieving infrastructure provision, rather than setting out clear development requirements. What infrastructure is actually sought from development proposals or is this appropriately set out within other Plan policies including the site allocations? Can the Council clarify the purpose of the policy and how a decision-maker would use it when determining future proposals?

11.1.1 The intention is for the policy to be read in full with the site allocation policies and the detailed delivery policies of the plan as a whole. While the site allocation policies set out site specific requirements, they also sign post to the more detailed delivery policy requirements. CP6 then sets out four criteria which explain how the decision maker will consider the most up to date IDP, how contributions can be collected and the relationship with CIL and how to avoid double counting.

11.1.2 The intention of CP6 is to recognise that infrastructure requirements are not static, national policy is likely to change for CIL and for example public funding may vary over the life of the Local Plan. Changing circumstances may become apparent when new areas of development are designed in greater detail, and/or ways of delivering services are reviewed. CP6 provides the guidance for the decision maker to apply the SDLP policies to the most up to date infrastructure needs and delivery requirements.

b. As regards the reference to developer contributions, we are unclear as to exactly what the policy is seeking from development proposals? What contributions are actually sought and are these viable? Can the Council clarify please?

11.1.3 CP6 has been viability tested through the strategic and detailed delivery policies and EB111 Stroud Local Plan Viability Assessment 2022 Refresh Report (August 2022).

c. Overall, is the policy justified, effective and consistent with national policy?

- 11.1.4 CP6 is justified to create sustainable communities and meet national requirements of the Framework. To deliver this the Council wishes to ensure that the necessary infrastructure is put in place to address community needs and ensure that transport improvements take place to address the traffic and travel consequences of new development. New development can create a need for additional infrastructure or improved community services and facilities, without which there could be a detrimental effect on local amenity and the quality of the environment.
- 11.1.5 The Policy will be effective as it will enable the decision maker to secure the infrastructure requirements set out in the strategic and detailed delivery policies.

Matter 11b Transport

Since the submission of the Plan and the production of the Council's Transport Topic Paper (EB6), technical updates on transport and viability have been published.

Definition and scope of transport infrastructure required

Introduction and Summary of Council position

- 11.1.6 Housing delivery is required in Stroud District. The Council aims to deliver this through planned growth allocated in the SDLP, with a strategic approach to cumulative development, working with partner authorities and organisations. The alternatives are under-delivery of housing, or speculative development outside of a Local Plan with limited ability to plan strategically for mitigation.
- 11.1.7 Given the geography of Stroud, with the Severn Estuary to the west and the Cotswolds National Landscape (AONB) to the east, there are limited alternative patterns of development which would not result in adding traffic to the north-south transport corridor, especially at M5 Junctions 12, 13 and/or 14. It is also noted that there are existing capacity issues at J12 and J14 now and National Highways (NH) has imposed holding directives recently on growth proposals impacting on these junctions. Background growth by 2040 alone will require motorway junction schemes to be developed. NH considers that mitigation in these locations is required early in the plan period, i.e. there is limited headroom to deliver development without requiring mitigation. Thus, whilst it has not been tested in the traffic forecasting modelling work, it is highly unlikely to be possible to propose a pattern of development that delivers sufficient housing, appropriately accounts for environmental and planning constraints, and does not require mitigation at M5 Junctions 12 and 14.
- 11.1.8 It is also the case that the traffic impacts which are forecast in these locations are only partially due to the SDLP allocations, with significant proportions from likely development in neighbouring authorities and from general background growth in traffic. It is agreed by the Council, NH, Gloucestershire County Council (GCC) and South Gloucestershire Council (SGC) that comprehensive schemes are required to address traffic impacts at M5 Junctions 12 and 14. Small scale or phased improvements are unlikely to be feasible to fully mitigate capacity issues. NH have concluded recently that they cannot identify an interim scheme for M5 J14

capable of addressing current proposals for housing development in the South Gloucestershire area. It is therefore not feasible for the SDLP to propose a mitigation scheme which is not reliant on other parties and funding sources. There is no alternative approach currently on the table to address this issue in a strategic manner other than through the approach put forward by the Council.

11.1.9 The Council recognises the uncertainty inherent in the status of neighbouring Development Plans, and therefore the uncertainty in terms of the exact funding sources and levels of traffic to enable the design work to progress. As set out, this is not an issue resulting from the particular plan which the Council is proposing but is resulting from the principle of the Council submitting any plan at all to examination. The Council has worked collaboratively and in the spirit of the Duty to Co-Operate over the development of the SDLP and is appreciative of the reciprocation it has received from its neighbours and the Highways Authorities. However, through the preparation of the SDLP since 2017, there have been two failed attempts to bring forward strategic development plans in the West of England region, the Joint Spatial Plan (JSP) and Spatial Development Strategy (SDS). There have also been delays in the review of the Joint Core Strategy (JCS) to the north. The SDLP finds itself ahead of neighbouring Development Plans and the Council has limited options but to progress and demonstrate at the examination that there is a reasonable prospect that strategic mitigation is deliverable, whilst recognising that there are details to be developed and agreed as to how that happens, and there is commitment to ongoing working with all parties to ensure that it does.

2. Have all essential transport infrastructure elements been identified and does the Plan adequately address these needs in its identification of the scale and location of proposed development? Has the preparation of the Plan been consistent with paragraph 104 of the Framework which states that transport issues should be considered at the earliest stages of plan-making?

11.2.1 Transport issues have been considered from the earliest stage of plan making, including to ensure that opportunities to promote walking, cycling and public transport are identified and pursued. This is in line with NPPF Paragraph 104. Throughout the development of the Plan, the Council has convened a Stroud Transport Group with key representatives including GCC and NH, and with SGC where relevant. This group has been fully involved in the development of the transport evidence base for the SDLP since the commencement of plan making.

11.2.2 Working through the Transport Group, the Council initially prepared a Strategy Options Transport Discussion Paper (EB59/60) to examine the transport implications of the four initial spatial options. This work supported the development of a spatial strategy based on concentrated growth.

11.2.3 Following work to identify suitable sites, the transport infrastructure requirements have been identified through the Sustainable Transport Strategy (STS) (EB60a-c and EB108) and the Traffic Forecasting Report (TFR) (EB61 and EB108) which form part of the evidence base for the SDLP. The STS sets out the strategic approach to sustainable transport for the Plan. This includes identifying specific items required to deliver strategic site allocations, as well as guiding the approach

to mitigation to be determined through the development management process for sites dependent on their scale and location. The TFR has taken account of sustainable transport measures at the strategic site allocations and then assessed the transport impacts of cumulative growth in terms of the scale and location of proposed development and identifying highway mitigation requirements. The highways infrastructure requirements are set out in the TFR and are demonstrated to be appropriate to mitigate the proposed development within the SDLP.

11.2.4 Transport infrastructure elements and mitigation requirements identified through the STS and TFR have been included within site allocation policies where relevant and are set out in the Infrastructure Delivery Plan (IDP) (EB69 and EB110).

3. In general terms will Core Policy CP6, the Infrastructure Delivery Plan (IDP) and other policies of the Plan, including allocation policies, ensure that necessary transport infrastructure will be delivered and in the right place and at the right time?

11.3.1 The infrastructure requirements set out in the STS, the TFR have been translated into site allocation policies and are set out in the IDP, which is referenced in Core Policy CP6. These policies provide the policy hooks required to ensure that contributions to, and delivery of, infrastructure is secured through the development management process. This will ensure that the necessary transport infrastructure is delivered in the right place.

11.3.2 The evidence base for the SDLP identifies the mitigation requirements for the Plan period. It does not set out the timescale at which that infrastructure is required. This will be established through the development management process.

11.3.3 The Council recognises that there are challenges related to uncertainty regarding housing and employment growth proposals in neighbouring authorities as development plans are in a less advanced stage than the SDLP. This predominantly affects strategic infrastructure requirements where there are cross-boundary impacts. The Council has made substantial progress in these matters and recognises that the submission of the Plan is a point in the process, and further work will be required with GCC, NH and neighbouring authorities, with regards the Strategic Road Network (SRN) when more information is known on external plans.

11.3.4 The purpose of the Transport Funding and Delivery Plan (F&DP, EB109) and regular engagement with the relevant authorities through the Stroud Transport Group and other strategic transport meetings, has been to make progress on the funding and delivery of strategic infrastructure projects to ensure that there is a reasonable prospect of the timely delivery of strategic infrastructure requirements.

4. Will the mitigation measures identified be sufficient to address the highway impacts identified?

11.4.1 The STS sets out a wide range of measures to ensure that appropriate opportunities to promote sustainable transport modes can be, or have been, taken

up given the type of development and its location (NPPF para. 111a). The TFR sets out the residual traffic impacts of the SDLP and demonstrates that the highway mitigation identified will be sufficient to address the impacts identified. The transport modelling and its conclusions are accepted by GCC, SGC and National Highways.

5. Is the Council satisfied that the Plan proposals would not have an unacceptable impact on highway safety or that the residual cumulative impacts on the road network would not be severe?

11.5.1 The Council is satisfied on these matters. Measures within the STS will have a beneficial effect on traffic impact through mode shift to sustainable modes and many of the measures will improve safety for a range of users, including Non-Motorised Users (NMUs). Taking these measures into account, the TFR identifies highways capacity impacts, mitigation is proposed, and this demonstrates that residual cumulative impacts would not be severe.

11.5.2 Transport Assessments for individual development proposals at the planning application stage will be required to undertake detailed analysis of capacity and safety proportionate to the scale of travel demand generated and specific to their locality and area of impact. Mitigation will be required to be proposed and delivered through the planning process, where a residual cumulative impact is identified.

6. How will the Council work with infrastructure and service providers (including National Highways, developers, landowners and neighbouring authorities) to identify and address any impacts of proposed development, including through the use of contributions, CIL and through the implementation of any highway improvement schemes?

11.6.1 The STS and TFR have identified the cumulative infrastructure requirements, which are set out in the IDP and translated into site specific allocation policies where appropriate. The Council, NH, GCC, and SGC have made a commitment to continued collaborative working on the strategic mitigation packages set out within the Transport Funding and Delivery Plan. Each party will be involved as appropriate to the scheme. The Council will also support GCC as required in the planning and delivery of measures within the Gloucestershire Local Transport Plan 4 (GLTP4).

11.6.2 Detailed work to identify and address the impact of proposed development will be achieved through the planning application process. Planning applications will be determined in line with the SDLP, which establishes the strategic infrastructure requirements. Transport Assessments will analyse the transport implications of development proposals and be required to identify site-specific impacts and mitigation requirements. The Council as the Local Planning Authority (LPA) will work with developers/landowners and the Highways Authorities (GCC, NH) through this process, and will involve neighbouring authorities where there are cross-boundary impacts. This will include securing the mitigation required, and the funding/delivery mechanisms.

- 11.6.3 Core Policy CP6 sets out the Council's approach towards delivery of infrastructure, using both CIL and legal agreements. It is acknowledged that the Government is planning to introduce a national infrastructure levy and the policy may need some minor changes to allow for its introduction.

Demand management and sustainable travel measures – Core Policy CP13

7. Core Policy CP13 seeks to support major development subject to three transport related criteria. It also provides a further 4 criteria to be met by all development schemes. The policy also expects proposals to 'consider all possible sustainable transport options' before increasing the capacity of the road network and to be consistent with and contribute to the implementation of the agreed transport strategy.

- a. Is the policy consistent with national policy which includes seeking to minimise the need to travel and promoting sustainable transport modes?

- 11.7.1 The Council considers that Core Policy CP13 is in accordance with national transport policy. Criterion 1 requires proposals to provide for a variety of forms of transport to allow for more sustainable alternatives to car trips. Sub-clause (i) requires schemes to be located and designed to minimise the distances that people need to travel, which reduces travel mileage, and increases the opportunity for sustainable travel, as there is greater potential to use sustainable modes for shorter trips.

- b. Does the policy set out clear requirements for sustainable transport provision? What is meant by the term 'consider all possible sustainable transport options'? What are developers meant to do after they have considered such options?

- 11.7.2 As a Core Policy, the text is necessarily strategic in nature and does not refer to specific sustainable transport measures as these will vary by site and development proposal. The work undertaken by the Council and GCC through the STS and GLTP4 will guide the strategic approach to the requirements for sustainable transport provision, and specific measures are included within the strategic allocation policies. Policy CP13 sets out core requirements which will need to be assessed and demonstrated through Transport Assessments submitted at the planning application stage.

- 11.7.3 The policy seeks to rebalance the approach to transport mitigation and access requirements towards sustainable modes. This is both appropriate and necessary as a strategic approach to transport. Transport impact is a function of person travel demand, not simply car travel demand. The policy establishes that the approach to mitigating transport impacts must seek to reduce car usage by mode shift to sustainable modes, prior to proposing traffic capacity enhancements. This is in line with the declaration of the Climate Emergency, and the Council's corporate objective to reach Net Zero by 2030.

11.7.4 The policy states that “Development proposals will be expected to consider all possible sustainable transport options before the capacity of the road network is increased.” Criterion 3 requires mitigation of adverse effects on the transport network. Therefore, the course of action is for the developer to identify the need for mitigation, then consider the options for mitigation comprehensively (with sustainable transport options above highway capacity options), and then on that basis agree the exact form of mitigation with the Highways Authority for provision by the developer.

- c. Does the policy recognise that opportunities to maximise sustainable transport solutions may vary between urban and rural areas as recognised in paragraphs 85 and 105 of the Framework? How does this apply to Stroud District?

11.7.5 The policy sets out that development will be supported where there are a variety of forms of transport as alternatives to the car. However, the policy is not prescriptive in terms of minimum standards for the level of choice of modes of transport available, and this will vary in interpretation by location. Furthermore, with regards to reference to “all possible sustainable transport options,” this will vary in interpretation by location. The policy is therefore consistent with the NPPF Para 105 in its drafting and the way it would be interpreted at development management stage.

11.7.6 As with the application of NPPF para. 105, and para. 110a, the decision maker will be advised by the Local Highway Authority (LHA) on the level of sustainable transport choices and opportunities which is appropriate or possible, with reference to the type of development and location. Clearly this will vary across Stroud District, with development in towns expected to facilitate a greater level of travel choice than at smaller rural settlements. Notwithstanding this, the SDLP seeks to deliver a pattern of growth focused on locations within the settlement hierarchy and at new settlements which are or can be made sustainable. This will afford greater potential to deliver a range of travel choices.

- d. Are the criteria justified and effective? Is it clear how a decision-maker should determine future proposals against each of the relevant criteria?

11.7.7 The criteria are considered to be justified by the need to address the relevant strategic objectives of the plan, namely SO4: Transport and Travel, and SO5: Climate change and environmental limits, underpinned by the Council’s aim to become carbon neutral by 2030. This will require policies which reduce the need to travel by locating complementary uses close to each other and by seeking the improvement of public transport systems, pedestrian and cycling facilities. This has to be complementary with a policy to support the reduction of the impact of vehicular traffic in terms of both congestion and carbon emissions. The criteria are also consistent with national policy and it is clear how each criteria would be applied. The LHA will advise the decision maker on whether the criteria are met in its response to a planning application as a statutory consultee.

- e. Is the reference to 'having regard to ... the Council's adopted (parking) standards' appropriate? Are these the standards set out in Appendix C? Is the policy clear on this and are the standards justified?

11.7.8 "Having regard to", is with reference to both car ownership and the Council's adopted standards. It is intended to ensure that the adopted standards are applied, but without implying that parking must be applied in line with existing car ownership, as there are multiple factors which determine an appropriate level of parking beyond existing car ownership. As the standards are part of the SDLP, they carry significant weight, and the application of the policy and the standards will reflect that. Policy E112 requires parking to be provided in accordance with the standards, and specifically Appendix C. This will ensure that the decision maker is aware of the location of the standards and the level of weight to apply to them.

11.7.9 The vehicular parking standards in Appendix C are not prescriptive in terms of the level at which they are set, noting that there will be significant variation in the individual circumstances. It sets out that parking provision needs to be demonstrated to be suitable in line with five criteria. These criteria match those in NPPF para. 107. Further detail is then provided on how this suitability will be considered, and the Council's position, in line with CP13, on prioritising sustainable accessibility to accommodate travel demand in the first instance over additional parking. Appendix C goes on to set out requirements for sizing of car parking spaces, and details of disabled, ULEV and cycle parking requirements.

- f. Is the requirement to be consistent with the transport strategy justified?

11.7.10 The NPPF makes clear at para. 106 that strategies and policies for supporting sustainable transport should be aligned. The Gloucestershire Local Transport Plan and Sustainable Transport Strategy are overarching strategic approaches to the delivery of transport measures, with a focus on sustainable transport. Inclusion of this reference is helpful to developers and decision-makers, as it guides them towards the LHA and LPA strategic approach to transport. Consistency with a strategy provides flexibility for both developers and the LHA to interpret the appropriate application of that strategy in the context of individual development proposals, based on the evidence within a Transport Assessment for at proposal.

- g. How does this policy relate to Delivery Policy E112? Are the policies consistent? Is there unnecessary or confusing duplication between these policies?

11.7.11 Core Policy CP13 and Delivery Policy E112 provide a consistent message to decision makers, and work together to ensure that all new development comes forward appropriately, in accordance with the sustainable transport hierarchy. As for all of the Delivery Policies, E112 provides additional detail as to interpretation and application of Core Policy CP13, and whilst there is some re-iteration of key principles between the two policies, this is necessary to ensure clear messaging of the policy requirements. There is no contradiction in the meaning or intention between these policies.

Promoting transport choice and accessibility – Delivery Policy E112

8. The policy seeks to promote transport choice and accessibility.

- a. The policy requires parking standards and principles for development to be provided to the adopted standards in Appendix C. Is this requirement consistent with Core Policy CP13 which only requires regard to be had to the standards? Is the policy clear and are the standards justified and consistent with national policy?

11.8.1 Policy E112 requires parking to be provided in accordance with the standards, and specifically Appendix C. “Having regard to” in the context of Core Policy CP13, is with reference to both car ownership and the Council’s adopted standards. It is intended to ensure that the adopted standards are applied, but without implying that parking must be applied in line with existing car ownership, as there are multiple factors which determine an appropriate level of parking beyond existing car ownership. The Council is happy to consider a modification to clarify matters and to ensure that the policies are consistent.

11.8.2 The vehicular parking standards in Appendix C are not prescriptive in terms of the level at which they are set, noting that there will be significant variation in the individual circumstances. It sets out that parking provision needs to be demonstrated to be suitable in line with five criteria. These criteria match those in NPPF para. 107. Further detail is then provided on how this suitability will be considered, and the Council’s position, in line with CP13, on prioritising sustainable accessibility to accommodate travel demand in the first instance over additional parking. Appendix C goes on to set out requirements for sizing of car parking spaces, and details of disabled, ULEV and cycle parking requirements.

- b. How does this policy relate to Core Policy CP13? Are the policies consistent? Is there unnecessary or confusing duplication between these policies?

11.8.3 Core Policy CP13 and Delivery Policy E112 provide a consistent message to decision makers, and work together to ensure that all new development comes forward appropriately, in accordance with the sustainable transport hierarchy. As for all of the Delivery Policies, E112 provides additional detail as to interpretation and application of Core Policy CP13, and whilst there is some re-iteration of key principles between the two policies, this is necessary to ensure clear messaging of the policy requirements. There is no contradiction in the meaning or intention between these policies.

District-wide mode-specific strategies – Delivery Policy DE11

9. The policy describes what the Council’s intention is in relation to working with key partners rather than setting clear policy requirements for development? Can the Council explain the purpose of the policy?

11.9.1 The NPPF makes clear at para. 106 that strategies and policies for supporting sustainable transport should be aligned. The Council recognises that there are multiple elements to delivering a sustainable transport network which require a strategic approach and cannot be comprehensively delivered solely through the development management process. As an LPA with no highways function, the Council is reliant on working with key partners, including GCC as the LHA, to deliver this network. The purpose of the policy is therefore to identify how the Council will ensure that strategies and policies for supporting sustainable transport will be aligned. The supporting text provides details on the mode-specific strategies to be developed.

Protecting and extending our walking and cycling routes – Delivery Policy EI13

10. The policy includes not permitting development where it would significantly harm an existing walking or cycling route or prejudices the proposed routes as listed. What is meant by ‘significant harm’ and are the 8 listed routes justified? Are these clearly identified on the policies map?

- 11.10.1 Significant harm would be considered on a proposal specific basis, comparably with the application of the term “severe” when considering proposals against NPPF para. 111.
- 11.10.2 The routes listed are a combination of specific routes proposed for enhancement for walking / cycling and also general routes for which it is essential to safeguard and promoted enhancement for walking and cycling (e.g. connections to National Cycle Network, existing towpaths).
- 11.10.3 The first five of these routes are retained from the adopted Local Plan and should continue to be safeguarded within the new SDLP. The specific routes mentioned are also included in the STS and GLTP4 and therefore have good justification for safeguarding within the Local Plan. GCC is rolling out a series of Walking and Cycling Implementation Plans (LCWIP) which will provide further detail on how these routes will be implemented.
- 11.10.4 The first five specific routes associated with Policy EI13 are included on the Policies Map.

11. Overall, is the policy justified, effective and consistent with national policy?

- 11.11.1 The policy states that the Council will support and encourage proposals that develop and extend the District’s walking and cycling network. This is justified by and in accordance with para. 104c and 106d of the NPPF. By extension, the policy’s requirement that new development must not cause significant harm to existing or future walking and cycling routes is also in accordance with the active travel requirements of the NPPF. Policy EI13 also requires new development to provide convenient access for pedestrians and cyclists, including the provision of cycle parking, in accordance with para. 110b of the NPPF.

- 11.11.2 The references to specific cycle parking standards and references to the specific routes which form part of the network to be protected and to be connected into, will ensure that the policy will be effective.

Provision and protection of rail stations and halts - Delivery Policy EI14

12. Is the policy justified, effective and consistent with national policy?

- 11.12.1 The policy to encourage the re-opening of passenger stations and also to oppose development which would result in a loss of land or facilities for existing or proposed rail stations is retained from the adopted Local Plan and is therefore justified within the new SDLP.
- 11.12.2 The specific mention of a new station at Bristol Road, Stonehouse on the Policies Map, and the support for the reopening of the Sharpness branch line in Policy EI14 are appropriate given the feasibility work undertaken since the previous Local Plan was adopted which provides greater understanding and certainty as to how these schemes could be delivered. A Strategic Outline Business Case for Stonehouse Station is currently being considered by the Department for Transport and the Sharpness new settlement proposal has examined the business case for re-introducing passenger services onto the Sharpness branchline. The support of these major infrastructure proposals is appropriate in accordance with the STS, and reflects the level of ambition sought by the Council under its Climate Emergency agenda.

Protection of freight facilities at Sharpness Docks - Delivery Policy EI15

13. Is the policy justified, effective and consistent with national policy?

- 11.13.1 This policy is retained from the adopted Local Plan, and forms part of the Council's strategy for regenerating the Berkeley/Sharpness area. The Canal and River Trust is actively developing and implementing a regeneration plan for their holdings at the Docks.

Provision of public transport facilities - Delivery Policy EI16

14. Is the policy justified, effective and consistent with national policy?

- 11.14.1 This policy is retained from the allocated Local Plan, and it is appropriate to retain for the new SDLP. The requirement for new development to cater for the needs of bus and taxi operators is in accordance with sustainable transport principles in accordance with the sustainable transport hierarchy, as outlined in para. 112a of the NPPF. The STS identifies specific public transport measures for strategic allocations, but the principles equally apply to smaller developments not subject to specific allocation policies.

Delivery and viability

15. Does the viability evidence supporting the Plan make realistic assumptions about costs?

- 11.15.1 The viability evidence supporting the SDLP includes costs which have been derived through the IDP process. The IDP EB69 and the IDP Addendum Report EB110 rely upon costs provided by infrastructure and service providers through engagement during Spring and Summer 2020 and further updated in May 2021. These costs are derived in a number of different ways, including the use of nationally and locally derived benchmarks and cost estimates from evidence-base documents such as the Local Transport Plan.
- 11.15.2 Whilst the SDLP establishes the principle that developments should mitigate their impacts through provision of infrastructure, it would be unrealistic to assume that developers bear all costs for infrastructure. As set out within the various 'Sector-specific Funding' sections of the EB69 Infrastructure Delivery Plan ('the IDP'), there are a number of other sources beyond planning obligations that can be utilised to deliver infrastructure, and these should be considered when testing the viability of sites.
- 11.15.3 Specifically in relation to transport infrastructure, the IDP largely relies upon schemes listed and their costs from the Gloucestershire Local Transport Plan (2015-2041) ('the LTP'). The LTP states that whilst the schemes identified do not reflect a commitment by the County Council for funding, they may be subject to future funding bids such as those through central government or developer contributions. Para. 5.2.15 of the LTP lists a number of these funding sources.
- 11.15.4 To reflect this approach, the IDP has assumed that, for the purposes of the viability assessment, only a proportion of the cost of schemes should be borne by developers. This should be tested through site specific site assessments such as Transport Assessments at the planning application stage and it should be then determined whether planning obligations are necessary, directly relatable to the development and whether they are fair and reasonably related in scale and kind to the development.
- 11.15.5 As the site-specific assessments are not available and costs are needed to be known at plan-making stage, a methodology has been established which Arup considers is most likely to reflect the situation generally. This assumes that for strategic transport infrastructure schemes, it is appropriate for 50% of the costs set out in the LTP to be borne by developers unless other funding sources are known and can also be deducted from the total cost. Mid-point estimates have been used from the LTP where a cost range has been estimated.

16. The Transport Funding and Delivery Plan (July 2022) (TFDP) identifies three transport mitigation packages. These are:

M5 Junction 12:

- improvements to M5 J12 (a new grade-separated junction);
- Improvements to the A38 / A430 / B4008 'Crosskeys' Roundabout; and
- Improvements to the B4008 / Stonehouse junction.

M5 Junction 14: comprising improvement to M5 J14 (a new grade-separated junction) and dualling of the B4509 between M5 J14 and A38.

A38 Corridor (This package includes the following number of individual junctions which have been identified for highway capacity improvements in the Traffic Forecasting Report (EB61)):

- A38 / Grove Lane;
- A38 at Claypits;
- A38 / B4066;
- A38 / B4066 Berkeley Road;
- A38 / Alkington Lane; and
- A38 / A4135.

Are these mitigation measures necessary and justified? Do they represent a comprehensive set of mitigation measures required to support the levels of growth set out in the Plan?

11.16.1 The mitigation measures required to support the levels of growth set out in the Plan are broader than the three strategic packages above. These are set out in the IDP and carried into the allocation policies. The evidence base for all the transport measures is the TFR and STS reports and their Addenda. Furthermore, development proposals will be expected to undertake more detailed site specific analysis through Transport Assessments in line with NPPF para. 113, to confirm whether additional local measures are required, and if so, what these measures might be.

11.16.2 The TFDP has been produced to respond to representations made by statutory consultees at Reg 19. stage, requesting additional detail on funding and delivery of mitigation. The full package of mitigation for the SDLP has been reviewed, and the aforementioned three packages have been taken forward for further review of funding and delivery. This is on the basis of their scale, complexity, and being required to mitigate multiple development sites, including development outside of Stroud District, as discussed in paragraph 2.8 of the TFDP. As set out in para. 1.4 of the TFDP, its scope does not include all necessary transport mitigation for the SDLP. This information is within the IDP.

17. As regards the proposed dualling of the B4008 and new park and ride:

a. Should these be included in the M5 J12 mitigation package?

11.17.1 The TFR Addendum identifies that the inclusion of the dualling of the B4008 is as a result of the significant increase in scale of the proposed Javelin Park allocation. As the need for this dualling is solely related to one allocation, it does not meet the criteria for inclusion in one of the mitigation packages considered in the TFDP, as set out in the response above to Q16.

11.17.2 Due to the nature of the strategic modelling assessment applied to the SDLP allocations, it has been necessary to assume a generic mix of employment types

within the modelling, which includes office space. If the type of development which comes forwards is predominantly B2 and/or B8, as might be expected in proximity to a motorway junction, the level of traffic generated would be significantly reduced, lessening the level of mitigation needed. Thus it may be that the development management process determines that the dualling is not required and/or that mitigation can be delivered through enhanced sustainable transport measures, such as improved bus service connections.

11.17.3 The M5 J12 Park and Ride/Interchange is a GLTP4 scheme which is at scoping stage. The purpose of this scheme would be to capture long distance car trips coming off the M5 and transfer those trips onto public transport for the onward journey into Gloucester. It would be unlikely to decrease the number of car trips going through the M5 J12, or to improve highways capacity or safety issues at this location, as that would not be the core purpose of the scheme. Therefore, whilst in geographical proximity, the purpose of the GLTP Park and Ride scheme is significantly different to the remainder of the M5 J12 package set out above, and therefore it has not been included.

- b. Is it reasonable and realistic to expect the dualling of the B4008 to be delivered as part of the Javelin Park extension site? Has a scheme been identified and costed to deliver this piece of infrastructure? Are there any implications for the delivery of the Javelin Park extension site? For example, is it necessary for this scheme to be delivered at a particular stage of the development and is that achievable?

11.17.4 As set out in response to Q17a, the need for dualling would be further investigated depending on the exact form of development which comes forwards at planning application stage. This is set out within section 3.15 of the STS Addendum (EB108), including with reference to an alternative sustainable transport led approach to be identified at planning application stage. As the requirement for B4008 dualling identified in the TFR is solely as a result of the Javelin Park extension, there is scope for a solution to be identified and delivered independently of other aspects of the Plan, meaning that it is appropriate for this matter to be addressed through development management.

- c. If the new park and ride scheme is still at scoping stage does this have implications for the viability and deliverability of the Plan?

11.17.5 The new park and ride proposed by GCC through GLTP4 will have strategic transport benefits for sustainable travel, particularly along the A38 into Gloucester. However, it is part of a wider Transport Plan, not relied upon to deliver the strategic allocations within the SDLP. Its inclusion within the STS recognises that it is a strategic measure for improving sustainable transport. The package of strategic measures within the STS are intended to guide investment in sustainable modes, with details to be agreed through the development management process. It is not intended, or required, to be fully funded by development.

18. The TFDP sets out indicative costs for the three schemes (page 5). For the M5 J12 scheme this is £9,437,500; the M5 J14 scheme is £27,246,837; and the A38 package is £3,812,500. Are these indicative costs realistic and do

they provide a reasonable basis upon which to consider the viability of delivering the growth set out in the Plan?

11.18.1 The scheme costs for the A38 package and M5 J12 that are quoted in the TFDP are taken from the SDLP IDP, which in turn has been taken from the Gloucestershire LTP. The IDP calculations take the midpoint estimate for these schemes of the funding range in the LTP. They then halve it to take account of planning obligations from smaller sites that may come forwards and the potential availability of public funding from other sources. This is considered to be a robust methodology for IDPs.

11.18.2 The difference in costing approach between M5 J12 and J14, which was necessary due to availability of information at the time of evidence preparation, is set out in Sections 3.2 to 3.5 of the F&D Plan. J12 costs appear low compared with J14 as J12 costs have already been factored by Arup according to the IDP methodology, whereas J14 costs are the calculated cost of the scheme based on a drawing provided by NH. Consistency of methodology has been applied to how those figures have then been taken on in the IDP and viability assessments.

11.18.3 As with all the information supplied within the IDP, this is expected to be a starting point, and this should be tested through site specific site assessments such as Transport Assessments at the planning application stage or more up-to-date costs calculated at design-stage.

11.18.4 SDC recognises that NH has expressed concerns that there is a risk that the schemes are undervalued. No alternative valuation has been made available to SDC. Of note, NH has advised that it considers that the existing bridge structures at M5 Junctions 12 and 14 may need to be replaced, rather than maintained. SDC/GCC/SGC/NH have all agreed that external funding sources will be sought for these schemes as soon as is practicable. All parties have agreed to support such funding bids.

19. The TFDP states that following discussions with National Highways, neither the M5 J12 or M5 J14 schemes are likely to attract funding from the Road Infrastructure Strategy (RIS) in the foreseeable future. Is that assumption still valid? Have all external sources of national funding for these schemes been fully explored?

11.19.1 It remains the Council's understanding that neither the M5 J12 or M5 J14 schemes are likely to attract funding from the Road Infrastructure Strategy (RIS) in the foreseeable future. This is an open discussion and the Council will continue to make the case for inclusion in RIS in the near future.

11.19.2 At this juncture, there are challenges in being able to progress opportunities for external funding. The SDLP is more advanced than both the South Gloucestershire Local Plan and the Cheltenham, Gloucester, Tewkesbury Joint Spatial Plan (JSP). There have been significant delays in the progression of both of these external Development Plans, including the collapses of the WECA Joint Spatial Plan (WEJSP) and subsequent Spatial Development Strategy (SDS). This

has meant that the Council has had limited certainty on the spatial pattern of growth outside of Stroud District.

11.19.3 The Traffic Forecasting model necessarily uses industry standard growth forecasts which are appropriate in these circumstances, as agreed with SGC, NH and GCC. However, there is not sufficient information available from neighbouring authorities to progress the development of schemes beyond the identification in the TFR of the scale of schemes which are required to be delivered. Whilst it is clear that the schemes are required to deliver a large scale of housing, the stage of adjacent Development Plans is not sufficiently advanced to enable meaningful conversations to take place with further sources of external funding, such as Homes England, as there is insufficient certainty on the specific external housing sites which would come forward and the number of homes that funding would unlock.

11.19.4 It is important to note that parties including SDC, SGC, GCC and NH have made a commitment to continue to work together on collaboratively progressing strategic infrastructure schemes. As greater detail becomes available on external Development Plans, growth and traffic forecasts can be refined and more detailed work on scheme design, costing, and funding can be progressed. This commitment includes investigating and actively progressing further public funding opportunity when sufficient information is available to support such bids.

11.19.5 SGC has advised that it considers that there is a role for the West of England Combined Authority (WECA) in the funding and delivery of transport projects required to deliver growth in SGC. However, it is understood that no discussions have taken place between SGC and WECA at this early stage in the SGC Local Plan as to what those projects may be and the level of funding. This is another avenue of external funding which would be explored at the appropriate time.

20. In the absence of national funding being available, the TFDP sets out a proposed apportionment methodology which would seek to take account of external growth from neighbouring authorities (including Gloucester, Cheltenham, Tewkesbury and South Gloucestershire). The TFDP goes on to explain that at this stage, the scale, location and nature of growth in these Districts is uncertain due to their respective Plan's being at an earlier stage of development. Nevertheless, modelling assumptions have been made in order to take account of growth from neighbouring Districts.

a. Were neighbouring Districts involved in discussions to develop these modelling assumptions and has any agreement been reached on this issue (such as Statements of Common Ground)?

11.20.1 The Council convened a Transport Working Group in 2017 which has met throughout the development of the SDLP. This has included NH and GCC throughout, and SGC at appropriate times to discuss cross-border transport matters. GCC is the Highways Authority for Stroud and neighbouring Districts and is also a full partner together with the District authorities to the north of Stroud preparing the Joint Spatial Plan. The Council has generally relied upon GCC to provide the input on transport matters for the Gloucestershire authorities.

11.20.2 However the Council has also raised the transport matters affecting M5 J12 directly with Gloucester City Council as part of wider discussions and transport matters more generally with other District authorities as part of the preparation of the Gloucestershire SoCG. The Council also attends meetings of the Gloucestershire Transport Modelling Group which includes representatives from all of the Gloucestershire Districts, although this Group had not been established at the early stages of the preparation of the SDLP and the building of the SATURN model. More recently, a specific working group has been in place regarding the M5 J14. NH, SGC, and GCC have all been involved in the development of the modelling, including growth forecasts.

11.20.3 The TFR details the modelling assumptions made to account for housing and employment growth up to 2040, including from neighbouring authorities. This has been carried out in line with DfT TAG Guidance and in agreement with NH and GCC. It is therefore considered the best available methodology to ensure that traffic growth from development is accounted for, given the uncertainty on external Development Plans. SGC agrees with this position. SGC has advised that it is unable to pre-empt the findings of its Local Plan process, and that it would be inappropriate to make any alternative modelling assumptions around growth locations.

- b. In looking at housing growth assumptions and the split between major and minor/windfall development it is noted that this was derived from housing delivery data from Stroud District. Was this a reasonable and realistic assumption to make? Are patterns of housing delivery data between Stroud and neighbouring authorities sufficiently similar to make this assumption valid?

11.20.4 The reason for using the housing delivery data from Stroud District is that the Council has had an adopted Local Plan in place since 2015 with a plan-led pattern of allocated sites and smaller windfall development. Given that both Stroud and neighbouring authorities are expected to have Local Plans in place shortly, the Council considers it to be reasonable to use this data as a proxy for future housing delivery within the context of 100% plan coverage.

- c. The TFDP goes on to apportion background growth between neighbouring authorities developments based on these assumptions. Table 7 sets out the results of the apportionment exercise. M5 J12 is set out as 38% Stroud and 62% from neighbouring authorities; M5 J14 is 20% from Stroud and 80% from neighbouring authorities; A38 Corridor is 60% from Stroud and 40% from neighbouring authorities. It would therefore appear that the majority of funding required for these infrastructure schemes is expected to be provided by neighbouring authorities, presumably sourced from developer contributions. Are these assumptions realistic or reasonable? Is there a realistic prospect of this funding coming forward to deliver the infrastructure required?

11.20.5 The apportionment is robust and based upon the agreed tool for the traffic impact assessment. It has objectively calculated the level of traffic increases in each of

the areas where a strategic mitigation package has been identified. It has identified the sources of the traffic increases and made worst-case assumptions on whether it is realistic for funding to come forward from these sources. The calculations assume that funding would not be forthcoming from small or windfall sites, which is a robust assessment, or from general background growth. It is therefore considered that the apportionment of funding sources is realistic, reasonable and robust. Regardless of the status of Development Plans in neighbouring authorities, there remains a need for housing to be delivered. Therefore, there is a reasonable prospect that the total level of funding apportioned to development in neighbouring authorities will come forward to deliver the infrastructure required. As stated, all parties will also work together to progress external funding opportunities to support the delivery of strategic infrastructure.

- d. Have discussions with neighbouring authorities taken place regarding the apportionment of these costs? Has any formal agreement been reached? How would funding for these schemes be collected and distributed? Which Council would lead the co-ordination and provision of these infrastructure schemes?

11.20.6 The Council has convened a Transport Working Group with relevant neighbouring authorities and stakeholders throughout the development of the SDLP which has covered a range of issues. The methodology used to apportion costs has been discussed. No concerns have been raised with regards to the mathematical exercise used in the methodology. However, SGC has stated that it will not be in a position to either agree or disagree apportionment of costs to development sites in its District until its Local Plan is further progressed. The same is true of GCC, as the LHA for, and partner authority with, the neighbouring authorities to the north. All parties agree that this is a risk but have committed to continued collaborative working on strategic infrastructure packages including progressing external funding opportunities.

11.20.7 The delivery lead/Scheme Promoter for each scheme would be the Local Highway Authority. For M5 J14, this would be SGC. For M5 J12 and the A38, this would be GCC. NH has advised that it would not act as delivery lead for junctions on the Strategic Road Network (SRN), which in this case is the M5, unless schemes were being delivered through the RIS programme. The funding would be collected by the LHAs. This would be through CIL/S.106 payments secured through the development management process, either paid directly to the LHA, or to the LHA via the LPA (or through a future national infrastructure levy administered locally). External funding opportunities will be supported by all parties and led by the appropriate party to the funding source.

- e. How would the global figure assigned to neighbouring authorities be broken down at the individual district level?

11.20.8 The neighbouring authority contribution figure at M5 J14 would be wholly assigned to SGC. The neighbouring authority contribution figure for M5 J12 and the A38 corridor would be assigned to Gloucester City Council. GCC is the Highways Authority for Stroud and Gloucester City, and therefore has oversight.

SGC is the Highway Authority itself and is working closely with the Council on cross-boundary matters, including M5 J14. Thus there is full visibility of the expectations of cross-boundary contributions towards these strategic mitigation packages.

- f. Is the level of funding that is expected to be sourced from developments in neighbouring authorities realistic and is there a reasonable prospect of it being secured during the lifetime of the Plan? If not, are there any implications for the delivery of the Plan?

11.20.9 The level of funding that is expected to be sourced from developments in neighbouring authorities is based on DfT TAG compliant forecasts for housing growth, as used in the TFR modelling exercise. This model is agreed to be the best available tool for assessing future traffic impacts, given the stage of development plans in neighbouring authorities. Robust assumptions have been made with regards the proportion of growth from which funding will be sourced, through removing background growth and small sites from the methodology. Whilst neighbouring Local Plans are still being developed, the housing need and requirement for housing delivery in neighbouring areas remains. Should this housing be delivered through speculative rather than allocated development, there will still be a requirement to contribute to strategic infrastructure. The progress made through the SDLP, if found sound, will provide a strong basis for LHAs covering neighbouring authorities to secure contributions for this infrastructure, from speculative or allocated development.

11.20.10 The Council has established a housing trajectory for the delivery of housing over the lifetime of the SDLP. The delivery trajectory shows that there is flexibility in the delivery profile to provide for growth to be delivered in the early years (first 5 years) at locations not directly or significantly impacting upon M5 J12 or J14 to provide for local needs. In the case of M5 J14, significant levels of housing from sites likely to impact on J14 is not expected until post 2030.

- g. Are any of the schemes identified reliant on land in third party ownership for their delivery? If so have discussions with relevant land owners taken place? If necessary, have realistic acquisition costs been included when calculating likely scheme costs?

11.20.11 The A38 package would be designed to be delivered within the public highway. Third party land is potentially required for the M5 J14 and J12 packages. At this early stage of scheme development, it would be inappropriate to undertake commercial discussions with landowners. This would occur when greater information is known around external traffic levels and thus scheme design has been able to progress. In the first instance, land negotiations would take place with a view to coming to an acceptable commercial arrangement. As is typical for strategic transport schemes, compulsory purchase powers would be available to the scheme promoters in the event that this was necessary to deliver the strategic transport schemes. Potential third party land requirements are to be determined but are likely to be minimal in the context of overall costs, and therefore have not been additionally included.

- h. The TFDP distributes the growth apportioned for Stroud District to 12 site allocations. Is the scale and distribution of costs reasonable? Is there agreement that the costs set out are reasonably accurate? Have viability considerations been appropriately considered?

11.20.12 Agreed Scheme costs are discussed in response to Question 18.

11.20.13 The proportion of cost allocated to each scheme has been based on an objective analysis of traffic impact using the Traffic Forecasting Model, which is agreed by the Highways Authorities to be the appropriate tool to assess the traffic impact of sites within the SDLP and traffic growth up to 2040. The viability assessment is robust as the cost apportionment has only incorporated SDLP allocated sites, and other development where there is a reasonable prospect of funding being available. In practice, it is likely that there will be other public funding sources, and funding will be available from smaller sites, but this has not been included for the purpose of a robust assessment.

- i. The TFDP states that sites delivering over 150 dwellings were considered capable of contributing towards strategic mitigation packages. How was this threshold set? Is it justified?

11.20.14 All development sites where there is shown to be an impact on the strategic infrastructure locations will be required to make a proportionate contribution to the infrastructure packages. This will, in practice, include sites with fewer than 150 dwellings where an impact is shown through the development management process. The purpose of using a threshold of 150 homes for this exercise, is to provide confidence that there will be a reasonable prospect of all funding allocated to development sites within the viability assessment coming forwards. There is no industry guidance as to what constitutes a large or small site, 150 dwellings was chosen based on professional judgement and as a high enough threshold to avoid multiple small sites being included within the assessment.

- j. If agreement on the apportionment of growth to neighbouring authorities cannot be reached, or if it is found that Stroud should meet a greater proportion of the cost of these schemes would there be implications for the deliverability and viability of these allocations?

11.20.15 All parties agree that the apportionment of funding for contribution to mitigation packages should be proportionate to the level of traffic impact. As has been set out, the neighbouring authorities are currently unable to say with sufficient certainty which housing sites will be allocated and at what scale, although the need to deliver housing in these authorities remains. Due to this uncertainty, the neighbouring authorities are unable to agree to, or disagree with, any financial apportionment, or to comment on the apportionment proposed. Notwithstanding this, all parties have committed to working together to progress the strategic mitigation schemes.

11.20.16 As has been mentioned elsewhere, the Council and partners will continue to seek public funding opportunities to bring forward the necessary transport schemes.

The approach set out in the Funding and Delivery Plan to apportionment takes a worst case scenario.

- k. Equally, if agreement cannot be reached would failure to deliver the infrastructure schemes during the plan period affect delivery assumptions for these allocations?

11.20.17 All parties are committed to the delivery of strategic mitigation schemes and will continue joint working as Local Plans develop. This will include seeking sources of public funding, in addition to funding from development sites as they come forward.

11.20.18 The A38 mitigation package comprises multiple locations and junctions. This could be delivered in stages, meaning that SDLP sites could contribute to earlier phases to mitigate their proportion of impacts, with JSP sites contributing to later phases. Thus there is low risk that the delivery of the A38 mitigation package would affect delivery assumptions for SDLP strategic sites.

11.20.19 The M5 junctions are more complex, as it has been established that a significant improvement scheme is needed in each location to address capacity issues arising now. It is unlikely that such schemes could be delivered in phases, although there may be short term incremental improvements which could be made.

11.20.20 It is clear from the modelling that the highest proportions of impact on the M5 junctions are from development outside Stroud District. Furthermore, the modelling shows that these junctions will experience capacity issues in the “Do Minimum” scenario, i.e. as a result of committed development and background growth. It is understood that NH currently has holding objections on live planning applications in SGC due to impacts at M5 J14 and no incremental schemes have been found to address their impacts to date.

11.20.21 The Council through the SDLP is driving progress towards a strategic solution to a strategic problem, and all parties recognise the importance of reaching agreement at the earliest possible opportunity. SGC needs to follow due process in the development of its Local Plan, and when greater certainty is available over housing allocations, agreement of apportionment can be reached. Alongside this, opportunities for external funding will be progressed. Thus it is recognised that delivery of the M5 J14 scheme may be a constraint to delivery of housing in the south of the District in the short term, but there is a reasonable prospect that a mitigation scheme will be delivered before the mid-point in the plan period. There are a range of other housing sites elsewhere to provide a healthy supply in the short term.

- l. Are any allocations or development reliant on the delivery of any of these schemes at a particular point during the plan period? For example we note comments from National Highways that improvements to Junctions 12, 13 and 14 of the M5 are likely to be required early in the plan period. If so, is a lack of identified funding likely to affect delivery assumptions in the Plan?

11.20.22 NH has recognised that improvements to M5 J13 would be solely required by the Forest Green Rovers stadium, and this is in the process of being resolved through the development management process. It has been agreed that capacity at M5 J13 is not a SDLP issue.

11.20.23 The TFR modelling exercise sets out the traffic impact assessment for the end of the SDLP period, i.e. 2040. The development management process will determine trigger points for delivery of infrastructure. This is typical and appropriate for a Local Plan assessment. Furthermore, as stated, with the current degree of uncertainty over locations for growth in neighbouring authorities, there would be little value in developing interim assessment year models to analysis thresholds for development.

11.20.24 As set out above, NH currently has holding objections on live planning applications as a result of impact on the M5 J14. It is therefore a reasonable position to hold that improvements to the M5 J14 are likely to be required early in the plan process. It is less clear from the evidence available whether M5 J12 would be required early in the plan period.

11.20.25 The Council has established a housing trajectory for the delivery of housing over the lifetime of the SDLP. The delivery trajectory shows that there is flexibility in the delivery profile to provide for growth to be delivered in the early years (first 5 years) at locations not directly or significantly impacting upon M5 J12 or J14 to provide for local needs. In the case of M5 J14, significant impact on J14 is not expected until post 2030.

21. The Sustainable Transport Strategy (STS) Addendum (July 2022) lists 14 interventions to be included in the STS Addendum (Table 2.2). The schemes include a number of significant infrastructure projects that are referred to in the Plan including public transport for a strategic park and interchange hub scheme for M5 J12 and a new railway station (s) south of Gloucester, north of Bristol. Under funding status, all the interventions state 'still required'.

a. Has any funding been identified to support the delivery of these interventions?

11.21.1 The schemes listed in Table 2.2 are schemes included within GCC's GLTP4, and have been included at the request of GCC. The STS was produced prior to the publication of GLTP4, and therefore the schemes have been added to the Addendum. The schemes align with the strategic approach set out in the STS, and therefore provide additional detail. GCC is best placed to advise of the funding status of each of its GLTP4 schemes.

11.21.2 The purpose of the STS is to set the strategic approach to delivering sustainable transport improvements alongside development in the Local Plan. It sets out core specific requirements for each strategic site to maximise opportunities for sustainable transport and guides the approach to delivering sustainable transport for all development coming forward in the District. It will support the application of Policies EI12 and CP13 at the development management stage. It is anticipated

that a range of measures set out within the STS will be delivered by a combination of development and public funding. In addition to specific requirements set out for site allocations, the development management process will identify measures and contributions required for each as it comes forward.

- b. Reference is made to a Strategic Outline Business Case (SOBC) being produced for a potential rail station at Stonehouse which will test options and deliverability. What are the timescales for this piece of work and when is it expected to be completed? If the SOBC concludes that a new station would not be viable would there be any implications for the Plan?

11.21.3 The Council, working with Stonehouse Town Council, received funding from the Department for Transport in October 2021 to produce a Strategic Outline Business Case (SOBC) for a new station at the former Bristol Road station site, Stonehouse. Working with local stakeholders, a range of options were considered and the SOBC was finalised in September 2022. The SOBC concludes that there is a strong strategic and economic case for a new railway station at Stonehouse served by one or two trains per hour. The councils are now awaiting an announcement from Government on whether the project can proceed to the next more detailed Outline Business Case stage.

11.21.4 The STS identifies that there is a need for improvements to sustainable transport options between Stroud/Stonehouse and Bristol. The original STS set out options to do this, including a new station, express coach services, or improved bus connectivity to Cam and Dursley Station. Now the rail station option at Stonehouse is further progressed, and there is a greater degree of certainty, this is given greater status within the STS. However, if the new station is not viable or does not receive funding, then there are other lower cost options to deliver the same aims.

- c. Are any allocations or development reliant on the delivery of any of these schemes at a particular point during the plan period? If so, is a lack of identified funding likely to affect delivery assumptions in the Plan?

11.21.5 Aside from the measures identified for each of the strategic site allocations, the need for specific measures for individual schemes, and their timing, will be determined through the development management process.

11.21.6 It is for GCC to advise on the current funding status of these schemes. However, it is not anticipated that a lack of public funding identified for these schemes would affect the delivery assumptions in the Plan.

- d. Are these interventions expected to be delivered during the plan period and if so how will they be funded?

11.21.7 The SDLP is not reliant on the full package of interventions being delivered during the Plan period. It is likely that the sustainable transport requirements for some developments, determined through development management, will include proportionate delivery of, or contribution to, some of these measures.

22. The STS Addendum also refers to land being safeguarded for the potential rail stations at Stonehouse and Charfield. The Stonehouse site is safeguarded through Delivery Policy EI14, but Charfield is not included. Is there sufficient evidence available at this stage in the process to justify safeguarding land for these two potential stations? Are they likely to be delivered during the plan period?

11.22.1 Charfield Station will be in South Gloucestershire and therefore land would not be safeguarded in the SDLP for Charfield Station. SGC has requested that Charfield Station be included within the STS. SGC has advised that they anticipate Charfield Station to be delivered during the Plan period.

11.22.2 Stonehouse Bristol Road station site is safeguarded in the current adopted Local Plan and has been the subject of a recent Department for Transport funded SOBC which has involved extensive consultation with Network Rail and train operators and which identifies a positive strategic and economic case. Whilst it is not possible at this stage to speculate on the success of the SOBC it is considered there is sufficient momentum to provide justification for safeguarding at this time. The SOBC has been developed on the assumption that the station can be delivered by 2040.

23. The STS Addendum sets out a number of other proposed updates to site proposal and policies (page 15 onwards).

a. Are these proposals necessary and justified by the evidence?

11.23.1 Transport issues have been considered from the earliest stage of Plan making, including to ensure that opportunities to promote walking, cycling and public transport are identified and pursued. This is in line with NPPF para. 104. Throughout the development of the Plan, the Council has convened a Transport Working Group with GCC and NH. This group has been full involved in the development of the STS, the wording of the transport related policies, and all aspects of the transport evidence base for the SDLP. GCC and NH have commented on iterations of the STS and its Addendum and accept the content of these documents. The original STS report also sets out the process that has been followed to develop the proposals. This includes stakeholder workshops, working with site promoters, and developing the package of measures.

11.23.2 Through the development of the SDLP and the site allocation process, the Council has reviewed the characteristics of the sites, key desire lines and movement requirements, in order to include key sustainable travel items required for each site. In including these elements as part of site allocations, SDC is ensuring that appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location, and that safe and suitable access to the site can be achieved for all users. This is in line with NPPF para. 110.

11.23.3 In line with NPPF para. 56 and 57, the STS measures applied to the site allocations are necessary to make the development acceptable in planning terms.

This is in relation to relevant NPPF policies on maximising sustainable transport opportunities, and SDLP policies CP13 and EI12. They have been formulated specifically to sustainably accommodate travel demand arising from the allocations and are therefore directly related to the development. They are also fairly and reasonably related in scale and kind to the development. Policy wording is not overly proscriptive, allowing the findings of the Transport Assessments for each site to propose the optimal way of delivering on the policy requirements. For example, a policy requirement to provide high quality, accessible cycling and walking routes between a site and a destination is clear on the outcome, but allows flexibility for more detailed analysis to evidence the optimal way of achieving this.

11.23.4 The Council understands that the site promoters, NH and GCC are all in agreement as to the suitability of the site specific sustainable transport policies proposed within the STS and STS Addendum, and these have been carried forward into policy.

b. Has the effect of these requirements on the viability of the relevant allocations and policies been considered and if so what does the evidence show?

11.23.5 Proposed measures are included as site specific requirements within the IDP, which has informed the viability assessment.

c. In order to ensure that the Plan is effective should the updates be incorporated into the text for the relevant allocations/policies in the Plan?

11.23.6 The STS Addendum and the SDLP have been developed in tandem. The updated site policies in the STS Addendum (EB108 p.15 onwards) align with the relevant allocation policies within the Plan.

11.23.7 However, it is acknowledged that more explicit references to the highway mitigation packages set out in the Funding and Delivery Plan could be added to the strategic site allocations, through appropriate modifications, if required.

24. The STS Addendum has updated the assessment framework that fed into the modelling in order to understand the traffic impact of the site allocations on the District's highway network. One of the considerations used in the update is stated as being a greater ambition towards sustainable travel across the District and to consider the impact of new sustainable transport interventions. Table 5.1 lists the effect of the updated assumptions, with most showing a reduction in the number of trips as a consequence of the updated considerations.

a. How was the extent of the reduction in the number of trips decided? Are the values evidence based?

11.24.1 The detailed methodology of deriving the reduction in trips is described in chapter 7 of the original STS. The STS Addendum sets out the changes made to those reductions. There is limited publicly available "evidence" as to the mode share

effect of introducing sustainable transport measures, which could be robustly applied to a range of schemes in different contexts. As such, it has been necessary to propose reductions based on professional experience and agree these reductions with the relevant Highways Authorities.

- 11.24.2 The STS Addendum outlines more robust mode share targets 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. It is true to say, however, that both the Council and site promoters consider more ambitious targets are achievable, but in order to demonstrate a robust approach, a consensus based on more conservative targets has been agreed by the Council for the purposes of the TFR.
- b. Given that there is some uncertainty over the funding status of many of the sustainable transport schemes listed in the STS Addendum was it reasonable to take account of these considerations?
- 11.24.3 The reductions applied to strategic site trips are wholly based on measures which will be provided by those sites, and not the additional GLTP4 schemes where the funding status is not fully determined. Where the strategic site measures will have clear benefits in terms of effects on background trips, reductions are also applied to those trips.
- 11.24.4 Packages of corridor measures are identified for the A38, A419, A4135 and contributions will be required from developments including strategic site allocations. These will benefit existing/background trips along the corridor in terms of achieving mode shift. The percentage reductions to background trips which are associated with these measures are based on funding from developments, and do not rely on public funding.
- 11.24.5 GCC and SGC have respectively advised that there is sufficient certainty over the delivery of Stonehouse and Charfield Stations, to consider these as committed schemes within the STS.
- c. If the sustainable transport interventions cannot be delivered in the right place and at the right time to support the allocations, what effect, if any, would this have on the updated modelling assumptions in terms of impact on the highway network?
- 11.24.6 GCC and NH have requested throughout the development of the SDLP that the traffic modelling demonstrates that the effects of SDLP growth can be mitigated without the reliance on mode shift as a result of STS measures. This is demonstrated within the TFR Addendum, which is accepted by GCC and NH. It is intended that more detailed mitigation scheme development and granular analysis through the development management process will account for potential mode shift which can be achieved by the introduction of sustainable transport measures.

- 11.24.7 Each site will be required to deliver sustainable transport measures in line with its allocation policy (where relevant), and in compliance with SDLP policies EI12 and CP13.

Matter 11c Other infrastructure

25. In general terms will Core Policy CP6, the IDP and other policies of the Plan, including allocation policies, ensure that other necessary infrastructure will be delivered in the right place and at the right time? Are the requirements clearly set out and are they justified and consistent with national policy?

- 11.25.1 In accordance with NPPF para. 34, the SDLP (CD1) establishes the principle that developments should mitigate their impacts through provision of infrastructure on or adjacent to sites or contribute towards schemes led by other bodies. This is reflected within Policy CP6 and para. 2.9.31 of the Plan and embedded within the IDP (EB69).
- 11.25.2 In accordance with paras. 16c) and 26 of the NPPF, the IDP uses consultation with infrastructure providers to confirm the baseline for infrastructure, to identify any planned schemes, to review the implications of the proposed growth and to test infrastructure requirements to support delivery of the proposed site allocations. Where possible, benchmarks were requested to enable an assessment of demands and costs and potential funding sources are discussed. The outcomes of this are presented in the section 'Planned Provision and Scheme Identification based on revised Housing and Employment Needs' (page 22), which sets out which infrastructure is necessary. This has informed strategic policies such as CP6 in accordance with para. 20 of the NPPF.
- 11.25.3 Each topic-specific chapter of the IDP lists out infrastructure based on each of the Clusters identified within the Draft Plan. This was consulted upon as part of the Regulation 19 Consultation and the feedback from some consultees, particularly site promoters, was for a preference for a site-specific list of infrastructure. Appendix A of the IDP Addendum Report (EB110) therefore clearly sets out which infrastructure projects relate to each of the Strategic Site Allocations. Section 3 of the SDLP then sets out the infrastructure requirements by Site Allocation and refers to the IDP and other evidence based documents for further information. This accords with para. 34 of the NPPF.
- 11.25.4 In April 2022, Arup engaged with Strategic Site Allocation promoters and developers on behalf of the Council to get an understanding of anticipated build trajectories and fed this into the IDP Addendum Report (EB110) for consideration in terms of triggers for infrastructure delivery. In accordance with para. 27 of the NPPF, the Council has developed Statements of Common Ground with key transport infrastructure providers including Gloucestershire County Council and National Highways, as well as each of the Strategic Site Allocation promoters to identify what infrastructure solutions can be found and agree when they need to be delivered. This early engagement and front loading of the approach will ensure that issues are identified at an early stage prior to planning applications being submitted to ensure that infrastructure, including transport schemes, can be

integrated with proposed developments and factored into viability. All of this will help to ensure the timely delivery of infrastructure.

Wellbeing and healthy communities – Delivery Policy DHC5

26. The policy supports proposals that include design measures for healthier lifestyles and sustainable neighbourhoods. However, it reads more like an objective rather than a policy setting out clear development requirements. What is the purpose of the policy, how would it be implemented, and is it justified, effective and consistent with national policy?

- 11.26.1 The policy is considered to set out a framework to consider development management matters related to wellbeing and health. The NPPF sets out the government’s planning policies and how they should be applied. It requires planning policies and decisions to “enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs” (NPPF, para. 92c). It also emphasises that the level of detailed supporting information provided to local planning authorities (LPAs) should be relevant, necessary and material, and that having the right information is crucial to good decision-making. The supporting NPPG, healthy and safe communities, suggests the use of HIA can be beneficial “where there are expected to be significant impacts”.
- 11.26.2 As a consequence, the Council has been working with other LPAs in Gloucestershire to produce this policy and reference the need for Health Impact Assessments (HIA). The Council took account of work and documents such as the Health Impact Assessment in spatial planning A guide for local authority public health and planning teams (October 2020) (EB226). A HIA provides a planning and decision-making tool used to assess the potential positive and negative effects of proposed planning and development projects. Impact assessments consider a wide range of factors and propose measures to mitigate projects’ adverse effects.
- 11.26.3 The policy approach and criteria accord with Public Health England expectations to protect and improve the nation’s health and wellbeing and reduce health inequalities. Public Health England are an executive agency of the Department of Health and Social Care, and a distinct delivery organisation. They help identify opportunities to deliver benefits across a range of policy areas: better quality housing, particularly in areas where they are most needed, will in the long term improve health outcomes; more and better active travel infrastructure in areas of poor air quality will lead to improved cardiovascular health; safer and more inclusive spaces for older people as well as those with a mental or physical health problem will deliver benefits to individual quality of life.

Green Infrastructure – Delivery Policy DES2

27. Taking account of recreational pressure at existing GI sites, should the policy be more specific about the identification and delivery of new GI

projects along with other mitigation measures and how these will be delivered and funded?

- 11.27.1 High quality open spaces contribute to the health and wellbeing of communities. The NPPF requires local planning authorities to set out policies enabling communities to access such opportunities. These policies must be based on a thorough understanding of local need and the scope available for new provision. The Stroud District Open Space and Green Infrastructure Study work (EB41, EB41 A-J) examines existing and projected needs for open space, green infrastructure, sport and recreation provision, using a variety of data sources, together with independent investigation, stakeholder and community consultation and surveys. The cluster map analysis (EB41 b-j) provides:
- Maps showing the provision of open space and GI;
 - Quantitative analysis of provision of open space and GI;
 - Analysis of access to open space and GI;
 - Summary of quality issues for open space and GI;
 - Analysis of future need for open space and GI, including existing key GI corridors and opportunities for enhancing connectivity for people and wildlife; and
 - Summary of open space and GI priorities for the area.
- 11.27.2 Examples of green (and blue) infrastructure in Stroud include rivers; cemeteries; canals; sports pitches; orchards; green roofs; parks; open fields and woodland. Green infrastructure can be considered at a range of scales, from international, such as the Severn Estuary or the Cotswolds Beechwoods SAC, to the local, such as a pond or a meadow created within a new housing development. The GI mapping goes beyond the site specific and considers landscape scale and strategic links, and considers GI and links within the surrounding area e.g. the Gloucestershire Local Nature Partnership (GLNP) County GI Strategy. The report uses the existing GI mapping to identify the key GI corridors and opportunities for addressing gaps in connectivity in terms of biodiversity and access. It provides an overview of access to GI across the district (using Natural England data) and also an overview of the value/quality of open space in contributing to GI against the three themes of Wellbeing, Water and Wildlife. Section 7.6 of EB41a evidence base provide overview maps showing the key GI corridors and the opportunities for improving connectivity (Figures 26 and 27). More detail by cluster/sub area is provided in the appendices (the cluster areas).
- 11.27.3 In terms of future delivery and funding, the Council is working with the Gloucestershire Local Nature Partnership, Gloucestershire LEP and the County Council to create a Gloucestershire Nature and Climate Fund to establish a biodiversity credit market linked with Biodiversity Net Gain and Local Nature Recovery Strategy work. A meeting in June 2022 laid out the principles of this joint working and a Memorandum of Understanding is shortly anticipated to be signed by the Gloucestershire LPAs. This in the future should bring forward opportunities to enhance biodiversity and green infrastructure. Existing Stroud GI evidence will have a role in this ((EB41a-II). Mechanisms for funding delivery could include s106, S111 agreements or delivery on site through a planning application.

28. Is the policy sufficiently flexibly worded to take account of individual development site circumstances / constraints and how that might affect the feasibility / viability of delivering GI?

11.30.1 The Council considers that the policy sufficiently flexibly worded to take account of individual development site circumstances / constraints. The Council will consider the requirements for GI, in line with evidence (including the LNP Local Nature Recovery Strategy) and relevant Local Plan policies and evidence, when determining planning applications. The Local Plan viability work has taken into account Policy DES2 Green Infrastructure and it did not add to the costs of development over and above those set out elsewhere in the report using published data for the cost of Biodiversity Net Gain in the Southwest.

Protection of existing open spaces - Delivery Policy DHC6

29. Is the policy justified, effective and consistent with national policy?

11.29.1 The Council considers the policy justified, effective and consistent with national policy. The policy identifies that open space, sport and recreation are important for our quality of life. Sports facilities and outdoor green spaces help us to enjoy more active and healthy lives, whilst also making our local areas more attractive places to live. Maintaining and enhancing recreation opportunities will contribute to opportunities for pursuing healthier lifestyle and improving our local places in accordance with the NPPF social objective at Paragraph 8 that supports strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 98 of the NPPF states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Paragraph 98 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless meeting the certain requirements which are outlined in our policy. The policy was drafted in the context of the Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) (EB41 and EB41a-j) evidence.

Provision of new open space - Delivery Policy DHC7

30. Delivery Policy DHC7 requires new residential development to provide open space and sports facilities in accordance with specific standards set out in the policy. The supporting text states that these standards are based on the Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) (EB41 and EB41a-j).

a. Are the standards justified and is the approach effective and consistent with national policy? Are the open space typologies clearly distinguishable or do some overlap?

11.30.1 Paragraph 98 of the NPPF states planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate. The standards used are based on the Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) (EB41 and EB41a-j) that examined current and projected needs for open space, green infrastructure, sport and recreation in Stroud District. Healthy environments and communities require open space and associated facilities to be of an appropriate quantity, quality and location. In terms of typologies the report acknowledges that although sites have been categorised into different typologies, the multifunctionality of different types of open space is important to recognise e.g. amenity green space, natural green space, parks and recreation grounds and allotments may all provide numerous functions such as providing space for recreation, habitat for wildlife conservation, flood alleviation, improving air quality, and providing food growing opportunities, and forming part of the overall GI network. The intrinsic benefits and ecosystem services provided by open space and GI are numerous such as providing an attractive landscape or improving health and wellbeing. The report sets out the typologies and standards used in sections 5.1.1 to 5.1.9. The quantity of provision is assessed using the recommended quantity standards for each of the typologies where a quantity standard has been developed. Recommended standards are expressed as hectares of open space per 1000 people. The figures of 'Park and Recreation Grounds (Combined)' includes a combination of the following typologies:

- Park and Recreation Ground; and
- Outdoor Sport (Fixed).

b. How will a developer or decision-maker determine what provision needs to be made for each future proposal?

11.30.2 Policy DHC7 provides quantity and access standards for new residential development. The study has produced local provision standard recommendations in accordance with relevant guidance and local needs and allows the application of such proposed provision standards enabling the identification of surpluses and deficiencies based on quality, quantity and accessibility. The key to developing robust local quantity standards is that they are locally derived, based on evidence and most importantly achievable. Typically, standards are expressed as hectares per 1000 people. The developer or decision-maker can then determine what provision needs to be made and where necessary seek the advice of experts in open space and recreation provision. Within the Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) (EB41a) on pages 156 and 157 Figures 31 and 32 show example flow charts/decision making process to help developers/council officers determine the need for on-site provision of open space, or where CIL/S106 contributions would be required to provide open space off site/improve existing open space provision. This is only a guide and requirements will be determined on a case by case basis using the standards and assessment within.

- c. Are the delivery mechanisms justified and effective? Is it clear how any off-site contributions will be sought?

11.30.3 The delivery mechanisms are well established in the District. Within the Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) (EB41a) on pages 156 and 157 Figures 31 and 32 show example flow charts/decision making process to help developers/council officers determine the need for on-site provision of open space, or where CIL/S106 contributions would be required to provide open space off site/improve existing open space provision. This is only a guide and requirements will be determined on a case by case basis using the standards and assessment within and professional expert advice if necessary.

- d. How does the application of the final sentence in the policy accord with the statutory tests for planning obligations?

11.30.4 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise³. The NPPF must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Paragraph 55 of the NPPF states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. Paragraph 58 states where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date. The final sentence of the policy is considered to accord with the statutory tests for planning obligations and the usual negotiation with the decision-maker during the planning application process.

Providing sport, leisure, recreation and cultural facilities - Delivery Policy EI11

31. The policy permits new facilities or improvements to existing facilities subject to 7 criteria.

- a. How would a decision-maker determine whether disabled access and bus, cycle and walking links were 'adequate' (criteria 3 and 5). What are the benchmarks?

11.31.1 The decision-maker would establish accessibility requirements on a case by case basis. For example, just using distances with the straight line walking distances do not take into account roads or barriers to access and so the actual route walked

(the pedestrian route) is generally further. There are maps on the Council GIS system which identify the location of bus stops and frequency of service. At present though this is like to change annually with some services ceasing and other new ones being created. The decision-maker can seek the professional opinion of transport experts in determining compliance with this policy requirement. The NPPF states that in assessing specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

11.31.2 The 7 policy criteria are considered to enable consideration of these transport and accessibility planning matters in an effective manner.

- b. Criterion 4 requires on-site cycle/vehicle parking to be provided to the adopted standards. Are these the standards set out in Appendix C? Is this requirement consistent with Core Policy CP13 which only requires regard to be had to the standards? Is the policy clear and are the standards justified?

11.31.3 In respect of Core Policy CP13 “Having regard to”, is with reference to both car ownership and the Council’s adopted standards. It is intended to ensure that the adopted standards are applied, but without implying that parking must be applied in line with existing car ownership, as there are multiple factors which determine an appropriate level of parking beyond existing car ownership. As the standards are part of the SDLP, they carry significant weight, and the application of the policy and the standards will reflect that. Policy EI12 requires parking to be provided in accordance with the standards, and specifically Appendix C. This will ensure that the decision maker is aware of the location of the standards and the level of weight to apply to them.

11.31.4 The adopted vehicular parking standards in Appendix C are not prescriptive in terms of the level at which they are set, noting that there will be significant variation in the individual circumstances. Appendix C goes on to set out requirements for sizing of car parking spaces, and details of disabled, ULEV and cycle parking requirements.

11.31.5 In this context the Council believes the criterion is consistent with the requirement for development to provide parking in accordance with standards. A response to potential changes to CP13 and Policy EI12 are set out elsewhere in the Council’s response to the Matters. The Council consider that the policy is both clear and the standards justified.

c. Overall, is the policy justified, effective and consistent with national policy?

11.31.6 The policy states that leisure and recreation are important for our quality of life. Leisure and sports facilities and outdoor green spaces help us to enjoy more active and healthy lives, whilst also making our local areas more attractive places to live. The Council will permit proposals that develop new sports, cultural, leisure and recreational facilities, or improvements and extensions to existing facilities. This is justified by and in accordance with para. 84d, 92c, 93a & b and 98 of the NPPF. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. The policy criteria will ensure that the policy will be effective.