



Stroud District Local Plan Review

Summary of Responses to Additional Technical Evidence Consultation

**APPENDIX D:
EB110 Infrastructure Delivery Plan (IDP) 2022 Addendum Report**

December 2022

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EB110 Infrastructure Delivery Plan (IDP) 2022 Addendum Report

Stakeholder name	Summarised comments	Stroud District Council Response
Sports England (4) All sites, EI11	<ul style="list-style-type: none"> The occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment 	Both the 2021 Infrastructure Delivery Plan (IDP) and the 2022 IDP Addendum assess requirements for sport utilising Sport England's Sports Facility Calculator and studies by SDC, including the Indoor / Built Sports Facilities Needs Assessment (2019) and the Stroud District Playing Pitch Strategy (2019). An update was not provided specifically on Sport as part of the IDP Addendum, as this sought to review key 'showstoppers' for the Strategic Sites Allocations only. The IDP and those SDC Studies all support the principal requirement for development to contribute towards meeting demand for sports and leisure infrastructure either onsite or via planning obligations.
	<ul style="list-style-type: none"> I would draw you are attention to Gloucester City Council' approach to sport funding 	Comment noted.
Wildfowl & Wetlands Trust (9) PS34/PS36	<ul style="list-style-type: none"> The developments at Sharpness Docks (PS34) and Sharpness new settlement (PS36) are likely to significantly increase recreational pressures on the Severn Estuary SPA/SAC/Ramsar site. Recreational mitigation measures proposed in the HRA should be considered an essential part of the infrastructure for these sites. Where this is not already the case, these measures should be included in the IDP. 	<p>Sharpness Docks has been fully assessed through the Habitat Regulations Assessment process. The Council is undertaking visitor surveys and developing a mitigation strategy to accompany the Local Plan.</p> <p>As the recreational mitigation measures are often not physical built infrastructure, it is therefore not appropriate to record it within the IDP. There is however a requirement within the 2021 IDP for SDC to ensure all Recreation Mitigation Strategies are up to date. The 2022 IDP Addendum also clearly sets out the likely costs towards Recreation Mitigation for each of the Strategic Site Allocations (see Appendix A).</p>



	<ul style="list-style-type: none"> For both sites, the HRA notes it will also be necessary for the developments to contribute to the strategic mitigation scheme for the Severn Estuary to ensure in-combination effects of the developments are addressed. This should be noted under the infrastructure requirements for PS34 and PS36 in the IDP. The Recreation & Mitigation Strategy for the Severn Estuary SAC, SPA and Ramsar should be updated as a matter of urgency and this update should be a condition of work beginning on these sites. 	<p>There is a requirement within the 2021 IDP for SDC to ensure all Recreation Mitigation Strategies are up to date. Appendix A of the 2022 IDP Addendum also clearly sets out the likely costs towards Recreation Mitigation for each of the Strategic Site Allocations PS34 and PS36.</p>
<p>Hardwicke Parish Council (18) G1</p>	<ul style="list-style-type: none"> Para 3.85 - Open Space - the suggestion for an on site community building should incorporate indoor sports and leisure facilities including a dedicated youth provision. Hardwicke will be a large community and a dedicated facility for young people will help to ensure young people have the opportunity to; develop community relationships, have the opportunity to thrive and to meet their specific needs. Indoor sports and leisure facilities should be designed to encourage and support physical and mental well being. 	<p>The infrastructure assessment has determined that there would unlikely be sufficient demand for new on-site indoor sports facilities. The guidance from Sport England is generally a preference for the provision of improvements to existing, well-used facilities as new facilities can detract from the existing and make them unviable.</p>
<p>Stagecoach West (20) PS19a/PS20/PS24/PS30/ PS32/PS43/G1/G2/P</p>	<ul style="list-style-type: none"> The IDP addendum is focused on a limited number of high-risk and high cost highways schemes. 	<p>Comment noted. The IDP Addendum 2022 sought to review key 'showstoppers' for the Strategic Sites Allocations only.</p>



S34/ PS36/PS37	<ul style="list-style-type: none"> The AECOM “Mitigation Review” process referred to has not been published and the basis on which cost appraisals have been made is completely opaque. Excepting M5 Junction 14, comparison across the material suggests that very little has been done beyond the crude mechanism in EB109 (q.v). Notwithstanding this, the mechanism for apportionment of costs on these few large projects is broadly logical. 	The ‘mitigation review’ has been published and is made up of documents EB108 Sustainable Transport Strategy and EB109 Transport Funding and Delivery Plan. Representors have had opportunity to view and comment on these documents
	<ul style="list-style-type: none"> The Sharpness Rail Branch Line reinstatement to Sharpness is only touched on by comparison despite its scale and risk. Quoted Network Rail advice to the promoter confirms that no robust infrastructure costs and feasibility do not exist. The stated broad cost “well into tens of millions” hugely conflicts with the £1.25m quoted in Appendix A, which defies credibility. Notwithstanding this, further evidence in the NR Strategic Rail Study strongly indicates that main line train paths do not exist to provide a rail service from Sharpness. Deliverability of rail infrastructure or service to support PS34 and PS36 at Sharpness is exceptionally questionable. 	The cost of £1.25m assumes some costs would be shared with other developments in the area and there would be matched funding from other sites. This is a typical assumption for large infrastructure items where benefits would be shared far and wide.
	<ul style="list-style-type: none"> Bus service interventions are entirely absent in the IDP Addendum, despite the clear deficiencies in the pre-existing evidence base. 	The IDP Addendum 2022 reviews key 'showstoppers' for the Strategic Sites Allocations only. The IDP addendum focuses on apportionment analysis undertaken by AECOM which was limited to highways only. Bus service improvements are considered in the 2021 IDP although it is recognised this is at a high level only. Sustainable transport corridors are identified in the STS and the 2021 IDP as these are built infrastructure. Specific bus route or timetabling enhancements not requiring built infrastructure and not likely to be a risk to plan-delivery are not covered in detail.



	<ul style="list-style-type: none"> Stagecoach has had no engagement with the team producing the IDP Addendum, indicating that bus services are out-of-scope in the evidence. 	<p>The IDP Addendum 2022 did not include engagement with Stagecoach as this sought to review key 'showstoppers' for the Strategic Sites Allocations only. Built infrastructure improvements to public transport were included in the IDP and derived from the STS which Stagecoach were consulted on and provided comments and input.</p>
Wisloe Action Group (WAG) (32,63) PS37	<ul style="list-style-type: none"> Whitminster (PGP2) and Moreton Valence (PGP1) were not selected for inclusion in the DLP despite both sites being more sustainable than PS37, they are; on the A38 corridor, nearer major employment areas, adjacent to M5 junctions and not requiring the same level of infrastructure investment. 	<p>These two sites are not more sustainable or deliverable than site PS37. Document EB9 Topic Paper - Assessment & selection of sites October 2021 sets out how the Local Plan sites were selected. The Sustainability Appraisal considers alternatives and the IDP provide evidence on infrastructure required to support the Preferred Growth Strategy.</p>
	<ul style="list-style-type: none"> All infrastructure capital schemes and ongoing support costs which underpin the sustainability improvement assumptions must be mandated as part of DLP, these include; foot/bike bridge over M5, sufficient local schools to match housing number requirements (all Cam schools are currently over capacity), new local centre and Dr surgery/dentist etc 	<p>Appendix A of the IDP Addendum identifies expected infrastructure projects to be delivered through site allocations, however this list is not exhaustive and infrastructure providers will be consulted again through the Planning Application stage.</p>
	<ul style="list-style-type: none"> The PS37 site-specific infrastructure costs which include; moving the high-pressure gas pipeline, generating 40 ft high embankments and noise attenuation fences, flood ponds, ALC mitigation etc. are not underwritten by a developer. Until these promoter's estimates are validated the submission should be considered very optimistic which significantly underestimates the true costs. The combination of CIL contribution and site-specific realistic infrastructure costs will lead to PS37 houses needing to be expensive to recover the investment, putting pressure on achieving the mandated number of affordable homes. 	<p>These are clearly abnormal costs and are not uncommon for strategic sites. As per paragraphs 10-012-20180724 and 10-014-20190509 of the Planning Practice Guidance (PPG), these should be reflected in the Land Value, as set out in document EB111. This is made clear at para. 2.32 to 2.35. and elsewhere in the document. Despite this, site PS37 performs better in viability terms than most of the strategic housing sites tested.</p> <p>All the strategic site promoters are confident that their sites are viable and deliverable, taking into account the policy requirements of the Draft Local Plan. Statements of Common Ground are being prepared to help the Inspectors at the Examination in Public.</p>



	<ul style="list-style-type: none"> • The IDP doesn't recognise the recent (2020) Slimbridge flooding caused by Lighenbrook, focussing instead on ground water risk. Run off from houses in PS37, plus that from the north Cam developments, will exacerbate the downstream flooding effects for Slimbridge and Cambridge. A full cumulative flood, drainage and sewage assessment must be mandated for PS37 now. 	<p>This work has been considered through the EB54 Strategic Flood Risk Assessment Level 2 (2021) and appendices.</p> <p>The 2021 IDP makes clear that a site-specific flood risk assessment will be required.</p>
Dursley Town Council (35) CP2/CP6/CP13/EI12	<ul style="list-style-type: none"> • Dursley's secondary school is already full to capacity, the omission of any new secondary school requirement to be delivered is short-sighted, it is difficult to see how the existing site could be extended to increase capacity. 	Chapter 6 of the 2021 IDP sets out that the Dursley Rednock secondary school will be over capacity by 2021. This is reflected in the requirement for a comprehensive solution to secondary school needs to respond to growth at Wisloe, Berkeley and Sharpness.
	<ul style="list-style-type: none"> • Highways mitigation in the form of a widening A38 approach is welcomed (PS24). The Slimbridge roundabout is Dursley's main link to A38 and M5 connections. The capacity of this roundabout to cope with increased traffic is important. 	<p>Comment noted.</p> <p>This issue is addressed in EB98 Traffic Forecasting and EB108 Sustainable Transport Strategy.</p>
	<ul style="list-style-type: none"> • There is no mention of the A4135 Cam pitch roundabout being already over capacity and any opportunities to mitigate the problem with increased traffic. 	This issue is addressed in EB98 Traffic Forecasting and EB108 Sustainable Transport Strategy.
	<ul style="list-style-type: none"> • Traffic lights would have an unacceptable adverse impact on the flow of traffic travelling in and out of Dursley. Council strongly opposed proposals to install traffic lights at locations, including: <ul style="list-style-type: none"> - A4135 Draycott, Cam - A4135 -over Bristol mainline railway bridge (S.14/2612/DISCON). - Proposed lights - Sandpits/Tilsdown/Dursley Road junction (S.15/2804/OUT the Stroud Local Plan Capacity Assessment, public meeting 27/09/16) 	Comment noted.



	<ul style="list-style-type: none"> There is no evidence that traffic lights improve the flow of traffic. Use of traffic lights has resulted in long queues, congestion and delays which has an adverse impact on the environment and emissions. Council campaigned to successfully remove traffic lights at the Castle Street/May Lane junction in favour of the existing mini roundabout, dramatically improving traffic flow. 	Comment noted.
	<ul style="list-style-type: none"> Council considers roundabouts to be a suitable, sustainable alternative measure, in terms of traffic flow, maintenance, the environment and air quality, to signalised junctions. 	Comment noted.
	<ul style="list-style-type: none"> This view is held for highway junction improvement measures and motorway junctions mentioned for signalisation. 	Comment noted.
Slimbridge Parish Council (37) PS37	<ul style="list-style-type: none"> Whitminster (PGP2) and Moreton Valence (PGP1) were not selected for inclusion in the DLP despite both sites being more sustainable than PS37, they are; on the A38 corridor, nearer major employment areas, adjacent to M5 junctions and not requiring the same level of infrastructure investment. 	These two sites are not more sustainable or deliverable than site PS37. Document EB9 Topic Paper - Assessment & selection of sites October 2021 sets out how the Local Plan sites were selected. The Sustainability Appraisal considers alternatives and the IDP provide evidence on infrastructure required to support the Preferred Growth Strategy.
	<ul style="list-style-type: none"> All infrastructure capital schemes and ongoing support costs which underpin the sustainability improvement assumptions must be mandated as part of DLP, these include; foot/bike bridge over M5, sufficient local schools to match housing number requirements (all Cam schools are currently over capacity), new local centre and Dr surgery/dentist etc 	Appendix A of the IDP Addendum identifies expected infrastructure projects to be delivered through site allocations, however this list is not exhaustive and could likely change through iterations of the DM process.



	<ul style="list-style-type: none"> The PS37 site-specific infrastructure costs which include; moving the high-pressure gas pipeline, generating 40 ft high embankments and noise attenuation fences, flood ponds, ALC mitigation etc. are not underwritten by a developer. Until these promoter’s estimates are validated the submission should be considered very optimistic which significantly underestimates the true costs. The combination of CIL contribution and site-specific realistic infrastructure costs will lead to PS37 houses needing to be expensive to recover the investment, putting pressure on achieving the mandated number of affordable homes. 	<p>These are clearly abnormal costs and are not uncommon for strategic sites. As per paragraphs 10-012-20180724 and 10-014-20190509 of the Planning Practice Guidance (PPG), these should be reflected in the Land Value, as set out in document EB111. This is made clear at para. 2.32 to 2.35. and elsewhere in the document. Despite this, site PS37 performs better in viability terms than most of the strategic housing sites tested.</p> <p>All the strategic site promoters are confident that their sites are viable and deliverable, taking into account the policy requirements of the Draft Local Plan. Statements of Common Ground are being prepared to help the Inspectors at the Examination in Public.</p>
	<ul style="list-style-type: none"> The IDP doesn’t recognise the recent (2020) Slimbridge flooding caused by Lighenbrook, focussing instead on ground water risk. Run off from houses in PS37, plus that from the north Cam developments, will exacerbate the downstream flooding effects for Slimbridge and Cambridge. A full cumulative flood, drainage and sewage assessment must be mandated for PS37 now. 	<p>This work has been considered through the EB54 Strategic Flood Risk Assessment Level 2 (2021) and appendices.</p> <p>The 2021 IDP makes clear that a site-specific flood risk assessment will be required.</p>
<p>Tritax Symmetry Limited (38) PS43</p>	<ul style="list-style-type: none"> Tritax Symmetry (Gloucester) Ltd accept that they should make a reasonable and fair contribution to infrastructure works to mitigate the impact of their proposal. Traffic movements from the proposed scheme are around 12.5% of that forecast for the B1/B2/B8 allocation. Based on the evidence documents submitted a contribution to the M5 Junction 12 Mitigation package of circa £145,000 is considered reasonable to past the tests for S106 payments. The significant reduction in trips from the application proposal negates the need for the dualling of the B4008 when the new grade-separated 	<p>Comment noted.</p>



	<p>Junction 12 and signalised approach lanes (and signal optimisation) is completed.</p>	
	<ul style="list-style-type: none"> All allocations should be expected to contribute to infrastructure costs including any works to the B4008. 	<p>Comment noted.</p>
<p>Environment Agency (41) PS33/PS34/PS35/PS36/BER16/17/ES4</p>	<ul style="list-style-type: none"> It is a missed opportunity that the IDP has not been updated to include commentary on water resources, especially in light of the comments we made at the Reg 19 stage in our letter dated 21 July 2021, our reference SV/2018/110073/CS-04/SB1-L02, particularly with reference to our comments on the evidence base under the water resources and quality section of our letter and the fact that we have raised soundness queries over the matter of water resources – “serious water stress”. 	<p>There is ongoing discussion working towards a Statement of Common Ground with the Environment Agency.</p> <p>The 2021 IDP relied upon the December 2020 local plan consultation response from the EA, as well as engagement directly with Arup in November 2021 (this was fed into the 2022 IDP Addendum). No reference was made to water stress in this response. EA engagement was held as part of the IDP Addendum and this issue was not specifically raised.</p>
<p>National Trust (42) All sites CP2/CP6/CP14/ES6/DES2</p>	<ul style="list-style-type: none"> The National Trust broadly supports several named sections of the IDP. However, we would like to see the Stroud Landscape Project included and supported. We have provided some information about the project, its scope and benefits. 	<p>Comment noted.</p>
	<ul style="list-style-type: none"> In respect of Cotswold Beechwood SAC Recreation Mitigation Strategy (RMS), the Trust is supportive of an RMS to mitigate increased recreational pressure. Given our significant ownership of SAC land, we look forward to conversations as to how we can play our part in delivery. In respect of the Rodborough 	<p>Support welcomed</p>



	<p>Common SAC RMS, the Trust supports the continuation of an RMS for the Common.</p>	
	<ul style="list-style-type: none"> The scale of the proposed housing development and the 'draw' of the Cotswolds means the local plan is likely to lead to greater recreational pressures across a range of sites. We have already mentioned Haresfield Beacon, and we would also like to mention Woodchester Park. The visitor management and restoration of this varied landscape is an ongoing project. Visitor facilities need specific mention in the IDP. 	<p>Comment noted.</p> <p>The issues described here do not represent a soundness issue for the growth set out in the Local Plan, and are not considered strategic enough for capture in the IDP.</p> <p>Alternative funding arrangements such as Local CIL allocation or BNG credits through the Gloucestershire Nature and Climate Fund could be considered for use for such projects.</p>
	<ul style="list-style-type: none"> The IDP has various images of energy infrastructure on its front cover and we consider that green energy generation is an essential part of the future infrastructure needs of Stroud District. Green energy provision requires specific mention in the IDP. 	<p>Comment noted.</p> <p>Chapter 12 of the 2021 IDP 'Utilities' covers energy, including electricity and gas in extensive detail.</p>
<p>CarneySweeney on behalf of Redrow Homes (46) G1 CP6/CP13/EI12</p>	<ul style="list-style-type: none"> We would question why the Strategic Employment sites are not included alongside residential allocations within the IDP. A number of the employment sites are expected to have large financial infrastructure contributions associated with them. These should be specified so that the viability of these site's can be assessed. 	<p>The Transport implications of Strategic Employment Sites have been tested and relevant mitigation measures proposed. It is unlikely that there are other significant infrastructure requirements (i.e. no effects on schools or healthcare) resulting from employment development, and therefore there is limited consideration of the sites within other aspects of the IDP.</p> <p>The Development Management process should capture principles such as BNG and flooding as per the policies in the Local Plan Review. Guiding principles on how these infrastructure topics should be addressed are outlined in the IDP.</p>



<ul style="list-style-type: none"> In terms of delivery, the IDP does not provide any detail as to how the infrastructure on Strategic Sites will be funded. Section 10 of the Viability Assessment Refresh however identifies that the infrastructure required on strategic sites will be funded in part by CIL, although no detail is provided on how this will operate in practice, and this will again be material to the viability of the Local Plan Review. Clarity over the intended funding mechanisms for the delivery of infrastructure associated with the Strategic Sites is urgently required so as not to cause any unnecessary delays to the delivery trajectory or phasing of the strategic sites. 	<p>The 2021 IDP identifies funding sources and the Project Tracker which accompanies the IDP indicates how each project could and should be funded.</p> <p>Appendix A of the IDP Addendum identifies expected infrastructure projects to be delivered through site allocations, however this list is not exhaustive and could likely change through iterations of the DM process.</p>
<ul style="list-style-type: none"> The IDP does not fully accord with the policy provisions of Policy G1 as currently drafted with the Submission Draft Local Plan Review. As such, we would suggest that the following revisions are made to the IDP to ensure its consistency with the Submitted Local Plan Review: Remove reference to Land South of Hardwicke (ref: G1) providing a secondary school on site but instead include a reference to a financial contribution to secondary school provision being required. 	<p>Appendix A of the IDP Addendum identifies a new primary school to be delivered at G1.</p>
<ul style="list-style-type: none"> Include a reference that Land South of Hardwicke (ref: G1) will provide a 2/3 FE primary school on site. 	
<ul style="list-style-type: none"> Remove reference to Land South of Hardwicke (ref: G1) making a contribution to Gloucester Fringe Electricity sub station 	<p>No justification has been provided for this comment. The 2021 IDP provides a detailed assessment of capacity based on engagement with the statutory undertaker which confirms capacity constraints at the Tuffley and Berkeley primary substations. Further engagement should be held between the developer and the statutory undertaker to discuss this issue.</p>



Blue Fox Planning Ltd on behalf of Persimmon Homes (Severn Valley) Ltd (53) PS24	<ul style="list-style-type: none"> The IDP should reflect the build out rate information provided to the District Council pursuant to the live planning application currently with the LPA. Based on a build out rate of 80 dwellings per annum from 2024. 	The IDP addendum includes build-out rates provided through consultation with Arup in April 2022 by Pegasus Group.
	<ul style="list-style-type: none"> From the list of documents published as part of this Technical Consultation exercise, there is no specific document titled Mitigation Review. Yet this is referenced as key document in the identification of infrastructure contributions listed at Table 17 of the IDP (Appendix A). 	The 'mitigation review' has been published and is made up of documents EB108 Sustainable Transport Strategy and EB109 Transport Funding and Delivery Plan. Representors have had opportunity to view and comment on these documents.
	<ul style="list-style-type: none"> Education contributions for PS24 are based on the Interim PPRs which are subject to on-going and as yet, still be concluded review. As with all infrastructure and planning obligations there must be a robust evidence base that supports the contributions being sought. 	Agreed. These will need to be monitored and contributions determined upon new evidence once published.
	<ul style="list-style-type: none"> IDP Table 17 that "No apportionment analysis has taken place for transport and highway schemes" and that "The costs provided are total estimated costs as per the Aecom Mitigation Review" there appears to be some items listed for Cam North West site that have a higher allocated cost when compared with other schemes that also have the same item identified. An example of this is the 'Highway Improvements Dursley Relief Road' which Table 17 identifies as having a cost of £436,047. Yet for PS25 (Cam North East Extension) the costs for this same project is £87,209. This implies that apportionment has taken place between sites, yet there is no obvious paper trail to explain how this apportionment has been undertaken. 	No apportionment has been undertaken by Arup within the framework of the IDP. Any figures for transport and highway schemes are derived directly from the 'mitigation review', which has been published and is made up of documents EB108 Sustainable Transport Strat and EB109 Transport Funding and Delivery Plan. The approach to apportionment should be reviewed with these documents.



Councillor Haydn Jones (54) PS36/PS37 All policies	<ul style="list-style-type: none"> There is no mandated bridge over the M5 from PS37. 	This project is not identified within the Local Transport Plan, the STS, the Highway modelling mitigation or Transport Funding and Delivery Plan. The IDP relies on these pieces of evidence and does not seek to define or create specific projects to address needs that have not yet been identified or technically evidenced. However, it is understood that the promoters are prepared to deliver such a bridge.
	<ul style="list-style-type: none"> Railway bridge on A4135 heading towards Cam from Slimbridge roundabout, which represents the main east/west connection, cannot accommodate two way traffic and pedestrians. It must be widened. Where is the proposal on how this would be achieved and funded. 	Comment noted. This project is not identified within the Local Transport Plan, the STS, the Highway modelling mitigation or Transport Funding and Delivery Plan. The IDP relies on these pieces of evidence and does not seek to define or create specific projects to address needs that have not yet been identified or technically evidenced.
	<ul style="list-style-type: none"> Site at Whitminster PGP2 is better connected, has direct access to motorway junctions, existing high grade vehicular and pedestrian access over the M5, excellent walking and cycling access along the restored Stroudwater Canal together with direct access to the proposed Eco Park at Easington. Why was this site considered not viable? 	The Whitminster site did not perform better than the Wisloe site in terms of accessibility to a range of services and facilities. The Wisloe site offers the potential for significant modal shift through access to Cam & Dursley station and completing the active travel strategic route between Uley-Dursley-Cam and Slimbridge. The IDP provides the evidence of infrastructure need for the Preferred Growth Strategy.
Gloucestershire County Council (55)	<ul style="list-style-type: none"> As with our comments on EB109, GCC officers have concerns about the robustness of the cost estimates provided and would like to understand better how the figures in Appendix A of the August IDP Addendum were calculated. 	A detailed explanation of the approach to derive costs is set out within the 2021 IDP. For transport and education, the 2021 IDP relies on costs derived by the County Council from either the LTP or from consultation with the LEA. The 2021 IDP provides a full list of references.
	<ul style="list-style-type: none"> Education: Where new schools are required, GCC will request provision of land in addition to a financial contribution to build school accommodation; this is described in the report for some of the developments, but not for others. 	Approach to resolving education needs have been derived from consultation responses provided by the LEA in preparing the IDP (May 2020) and to those received at Reg 19 stage. Arup was referred back to the responses provided at Reg 19 Stage when it re-engaged with the LEA in June 2022 as part of the IDP Addendum updates.
	<ul style="list-style-type: none"> The level of requirements shown in the IDP Addendum report may change by the time planning applications are submitted. 	Agreed. It is recommended that regular updates are made to the IDP as infrastructure is implemented through the delivery of the



		Adopted Stroud Local Plan and application / completion of development sites
Avison Young on behalf of Tortworth Estate and St Modwen Homes (56) CP6	<ul style="list-style-type: none"> The submission of the EB109 to the examination and the agreement of a SoCG between the parties involved are both welcomed. 	Noted.
Cam Parish Council (57) PS24/PS25	<ul style="list-style-type: none"> No mention of the A4135 Cam pitch roundabout being already over capacity and any opportunities to mitigate the problem with increased traffic. Outcome of feasibility study for the Greenway should be known prior to such support and reliance upon the delivery of the cycleway. A potential route built across the NE Cam Housing Development would be very beneficial as it would avoid the route having to go along the very narrow Chapel Street and busy High Street as currently planned and contributions would be expected from the developers. 	These issues are addressed in EB98 Traffic Forecasting and EB108 Sustainable Transport Strategy.
	<ul style="list-style-type: none"> As recognised in PPG25 and PPS25, the need for flood catchments to be considered holistically with regard to cumulative impacts of multi-parcel developments adjacent to one another to be considered together, the impact upon the River Cam should be assessed using hydraulic modelling to ensure compliance with these policies. Jubilee field drainage, no methods of mitigation suggested to ensure adjoining new homes due not have negative impact upon existing problems at the sports ground. Pollution incidents have been identified in recent months caused by increased run off from residents' homes therefore the obvious concern about more homes being delivered 	<p>PPS25 and PPG25 have been superseded, flooding issues are addressed through the EB54 Strategic Flood Risk Assessment Level 2 (2021) and appendixes. This work is compliant with the NPPF and NPPG.</p> <p>The 2021 IDP makes clear that a site-specific flood risk assessment will be required.</p>



	<ul style="list-style-type: none"> CPC does support the need for a 2 form primary school but would push to say the a 3 form would be more realistic taking into consideration the potential requirement from ps24 and ps25. The lack of preschool facilities within the parish has been a considerable factor for many working parents who live in the parish. The omission of any secondary school requirement to be delivered is short sighted considering that the existing secondary school is already full to capacity. 	<p>The LEA provided comments on the 2021 IDP (May 2020) and further comments were received at Reg 19 stage. These were incorporated into the 2022 IDP Addendum. GCC Education has advised on appropriate school sizes and the need for a new school has been derived from GCC requirements.</p> <p>Site allocation PS24 includes a requirement for contributions towards secondary school and further education provision.</p> <p>These comments are notwithstanding the PPR review which is ongoing and may result in changes to the assessed need for education places.</p>
	<ul style="list-style-type: none"> CPC supports the requirement for a new doctors' surgery. Cam/Uley Practise (Orchard Medical Centre) has been expanded to capacity and there would be extremely limited options to deliver a bigger practise at their current location. Difficulties in obtaining appointments and car parking restrictions for our growing community has been reported many times at the parish council offices. 	<p>The PCIP outlines that the CCG is exploring development options for the Cam & Uley Family Practice. The development options include the possible expansion of premises at the existing site, together with associated facilities such as parking. The practice has been in contact with the CCG around potential funding mechanisms.</p> <p>It is likely that a branch surgery would be required to support development in the Berkeley Cluster.</p>
<p>Hamfallow Parish Council (61) PS36</p>	<ul style="list-style-type: none"> The ITP also touches on one of the other issues that we have commented on before – flood risk and mitigation. Paragraph 3.6.2 recognizes that the site is only protected from a 1 in 100 year flood from the River Severn and essentially unprotected from flooding by the Little Avon. Such flooding has occurred in the recent past. No solutions are suggested, other than the developer contacting the Environment Agency. We are certainly not aware of any substantive proposals by the EA to improve these flood defences within the timescale of this proposed development. 	<p>This has been considered through the EB54 Strategic Flood Risk Assessment Level 2 (2021) and appendices.</p> <p>The 2021 IDP makes clear that a site-specific flood risk assessment will be required. In accordance with the NPPF, development would need to be sequentially located away from areas of most flood risk. Only if the sequential test is demonstrated, then the exception test would be triggered and mitigation required. This requires further detail and should therefore be address at the planning application stage (or during pre-app).</p>



	<ul style="list-style-type: none"> We have found nothing in these new documents to reduce our concerns as previously expressed, particularly in respect of transport and flood risk. In fact, our concerns have increased as a result of your apparent determination to press on without any evidence that transport infrastructure will be adequate. 	Comment noted.
BaSRAG (Berkeley and Sharpness Residents' Action Group) (64) PS36	<ul style="list-style-type: none"> The EB110 Infrastructure Delivery Plan (IDP) Addendum is a highly technical document that we, as a voluntary organisation without the detailed expertise, find it difficult to comprehend and comment upon, especially in the short time afforded to us. However, suffice to say that we find nothing in it that reassures us that the proposed infrastructure is viable, deliverable or adequate to address a development of the scale proposed at PS36. 	Comment noted.
McLoughlin Planning on behalf of Severn Homes (70) PS44	<ul style="list-style-type: none"> In conjunction with the Reg 19 submissions, the differential between strategic sites and local sites in the plan is not properly justified and unhelpful. 2.1.1 This part of the IDP focuses on the various transport related infrastructure requirements arising from the new local plan allocations. In this part of the document, reference is made to J13 of the M5 and the need for allocation PS44 to contribute to it. However, when compared to the previous IDP (EB69) there is no such reference to allocation PS44 having to contribute towards M5 J13 upgrades. To further complicate matters, the IDP update does not provide any calculation demonstrating what level of contribution will be sought from PS44. 	<p>The 2021 IDP (as explained within Chapter 4) relies upon the assessment from the STS and the LTP.</p> <p>The 2022 IDP Addendum relies upon the 'mitigation review' made up of documents EB108 Sustainable Transport Strategy and EB109 Transport Funding and Delivery Plan. This update to assessment is based on analysis by Aecom which relies upon traffic modelling that links traffic impacts to specific developments and is therefore a more accurate and up to date assessment of transport impacts. The previous IDP was reliant on spatial assessment only and the Aecom analysis represents the updated position of the Council.</p>



- 2.1.2 This part of the IDP focuses on transport improvements on the A38 Corridor Package. As with concerns expressed at 2.1.1, Allocation PS44 is identified as contributing to general improvements on the Corridor. In terms of the level of funding sought, the IDP provides a calculation of contributions from the strategic sites but fails to make any calculation for 'local' sites. As a result, it is not possible for SevenHomes to have any certainty about the level of contribution it will be liable for. Given the lack of this information, it is not possible for SevenHomes or the Local Plan to understand the resultant impact on the viability of allocation PS44 as a 30-dwelling allocation. The difficulty arising from this lack of information is further compounded by the fact that the IDP sets out that the Corridor Package has a total cost of £3.8 million and the strategic sites account for £2.7 million of funding to deliver this package. This leaves £1.1 million unaccounted for in terms of what the local sites will contribute towards these improvements. Whilst PS44 cannot deliver the shortfall, it provides additional justification for the increase in dwelling numbers at PS44 to 80 units as opposed to 30 allocated. This increase could provide some funds towards those improvements, only if they are properly justified in accordance with paragraph 57 of the NPPF.

The IDP Addendum 2022 sought is a focused review of key 'showstoppers' for the Strategic Sites Allocations only. The 2021 IDP does include consideration of infrastructure costs for Local Allocations, and this should be used as a starting point to determine where infrastructure is required to mitigate development impacts.

As with all development sites, the IDP is a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.



<ul style="list-style-type: none"> Highways contributions - general points - The above concerns show a lack in transparency in the evidence base which will be used by the Council in determining the planning application for the site and determining exactly what level of contributions should be sought to support new development. The situation is further complicated by the fact that the County Highways response to the planning application currently in determination at Stroud District does not allude to any highways contributions to the M5 J13 or the A38 Corridor Package. 	<p>As set out above, the IDP is a starting point for identifying infrastructure needs, based on overarching assessments covering a wide geographic area.</p> <p>If site-specific assessments are agreed and conclude other mitigation is required, then it may be more appropriate to rely upon these in the DM process.</p>
<ul style="list-style-type: none"> 2.3.1 In conjunction with Reg 19 submissions – SevenHomes is concerned about the treatment of BNG in the emerging Local Plan and the robustness of the assumptions the Plan makes in allocating sites for development and their ability to meet 10% BNG. Page 5 of the document sets out a mechanism where BNG cannot be provided for on site. The concern here is that whilst there is a potential mechanism, the first paragraph under the flowchart on the top of Page 6 states that: “The GNCF is currently briefing the Gloucestershire Authorities, including Strategic Directors, Planning Officers, Councillors and Members with the aim of agreeing a memorandum of understanding to establish joint-working and a county-wide approach. It is also asking local authorities to identify sites that could be utilised to provide off-site BNG.” The issue with this is that whilst there is a clear aim of agreeing a county wide approach, it is far from being delivered at a policy level, let alone at a practical level as there are no sites identified in the IDP against which BNG off-site mitigation can be delivered. The risks associated with 	<p>Delivery Policy ES6 sets out that development proposals shall demonstrate that the mitigation hierarchy has been followed sequentially using avoid, reduce, rescue, repair, compensate or offset. Where development is considered necessary, adequate mitigation measures or exceptionally will be required with the aim of providing an overall improvement in local biodiversity. In terms of BNG, whilst the Environment Act 2021 gained royal assent in autumn 2021; there is now a transitional period of up to 2 years with a program of secondary legislation to be released early next year. Dialogue continues at County to secure an approach that will identify sites so that BNG can be delivered within these timescales. However it will be necessary to demonstrate accordance with the mitigation strategy sequentially and SALA and the Local Plan identified 30 dwelling potential which can be accommodated, recognising the planning constraints and particular issues to address.</p>



	<p>this are that where allocations cannot deliver BNG on them for legitimate planning and land control reasons, they are highly likely to be stalled in the process and will only come forward, once mitigation sites are provided. In pursuing an application on PS44, SevenHomes has demonstrated how BNG can be delivered and why it requires a larger allocation. This continues to highlight the lack of understanding of the BNG issue by the Council in preparing allocations in the Local Plan. It further reinforces the need for larger site allocations to ensure that BNG can be delivered.</p>	
	<ul style="list-style-type: none"> Table 5 Cotswold Beechwood SAC - Developer contributions towards the mitigation of recreational impacts arising from new development in the Beechwood SAC are critical to addressing potential Natural England objections to development. The IDP simply fails to recognise the contribution being sought from PS44 which is understood to be £187 per dwelling. The table should be updated to reflect this contribution as well as that sought from other local sites. 	<p>The Cotswold Beechwood Mitigation Strategy was adopted by the Council on the 4th October 2022. This indicates all residential and tourism development will contribute to identified mitigation.</p> <p>PS44 is not a Strategic Site and therefore isn't included in Appendix A of the IDP Addendum.</p>
South Gloucestershire (71)	<ul style="list-style-type: none"> South Gloucestershire Council has raised concerns regarding the technical evidence published for consultation on 27th September and which SDC seek to rely on to justify the reasonable prospect that the funding and delivery of their Local Plan spatial strategy can be achieved in a sustainable way. South Gloucestershire Council has put forward recommendations to resolve these matters and would welcome continuing to work with Stroud District Council to resolve these matters through agreeing appropriate modifications which can be 	<p>SDC will continue to work with SGC through a Statement of Common Ground to address issues raised.</p>



	<p>secured through a SoCG ahead of examination in public commencing. Subject to this, the matters remain unresolved and points of objection at the current time.</p>	
<p>Pegasus Group on behalf of Robert Hitchins (73)</p>	<ul style="list-style-type: none"> The representation contains very detailed comments that are difficult to summarise, as with all summaries, the below should be read in conjunction with the full representation: <p>Education - The proposal of section 2.2.4 - The proposal of the IDP is that educational needs should be considered on a case-by-case basis taking account of numerous different potential pupil yields including that set out in the Interim Position Statement, that identified by the District Council and any subsequent estimates. This provides no clarity as to how educational needs will be determined contrary to the requirements of the PPG (23b-004) and as such this cannot be accurately accounted for in the price paid for land. Depending on the yields applied this may then result in developments becoming unviable with the result that some developments may be unnecessarily delayed, and a reduced level of affordable housing may be delivered, or unable to come forward at all.</p> <p>This lack of clarity also allows the County Council (as they have done previously) or indeed developers to introduce untested new pupil yields which supersede those currently available on an ad-hoc basis to justify a different level of educational contribution. This would inevitably result in significant debate and therefore delay in the determination of planning applications.</p> <p>For all of these reasons, the proposal set out in section</p>	<p>The IDP is a starting point for assessing infrastructure requirements, and further analysis will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.</p> <p>The same applies for calculating educational needs. PPRs should be used as a baseline / initial assessment, however there should be consideration of other factors such as existing school capacity. This is consistent with the advice received from the LEA.</p> <p>It should also be noted that a review of PPRs is being undertaken by the LEA which will seek to ensure that the PPRs are a more accurate reflection of current educational infrastructure needs.</p>



	<p>2.2.4 of the IDP is not only contrary to national policy, but it is so vague as to be ineffective and is likely to have significant adverse effects on the delivery of sites.</p>	
	<ul style="list-style-type: none"> The funding mechanism - In paragraph 10.39 of EB111, it is identified that the infrastructure required on strategic sites will be funded in part by CIL, although no detail is provided on how this will operate in practice, and this will again be material to the viability of the Local Plan Review. In the absence of such clarity, the Local Plan will not be effective in supporting the timely determination of viable planning applications. <p>It is assumed that the methodology set out in Appendix E of the Infrastructure Funding Statement (EB102) will continue to apply such that all educational infrastructure, with the exception of primary schools on strategic sites will be funded by CIL as this is the basis upon which the operative CIL Charging Schedule was justified. This should be set out in the Development Plan as inferred by the PPG (25-010) and (25-021) to ensure that there is a viable, clear and effective mechanism to determine planning applications.</p> <p>Without such clarity, developers may either resist submitting planning applications as they may consider these unviable if educational infrastructure is to be secured through s106, or decision-takers may mistakenly request s106 contributions towards</p>	<p>As per the 2021 IDP, GCC Education has advised that contributions towards mitigating development impacts on schools should be secured via s106 agreement. CIL would only be relied upon for smaller sites and windfall development.</p>



	<p>education contrary to the intended operation of the CIL Charging Schedule and the recently adopted Infrastructure Funding Statement.</p>	
	<ul style="list-style-type: none"> Land North West of Stonehouse (PS19a) - As set out in previous representations, the available evidence demonstrates that there is no need for a primary school to be provided at Land North West of Stonehouse given the significant available capacity in nearby schools. 	<p>GCC Education has set out that a new primary school will need to be provided at the proposed Northwest of Stonehouse Strategic Development Site (ref. PS19a) in the short to medium-term to support new housing development. GCC Education estimate this would need to be a contribution equivalent to a single form of entry on a 2ha site.</p>
Lichfields on behalf of CEG (78)	<ul style="list-style-type: none"> The IDP (EB110) contribution requirements equate to 10% of the listed cost of the junction improvements (rather than 20% as suggested elsewhere within the IDP). The contribution requirements noted in the FDP equate to £5,370,000, which equates to 19.7% of the listed cost. For viability and planning obligation reasons, SDC should clarify the total contribution costs for each proposed allocation. 	<p>Comment noted. The IDP is a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.</p>
Blackbox Planning on behalf of Taylor Wimpey (83)	<ul style="list-style-type: none"> M5 Junction 12 - Mitigation associated with M5 Junction 12 has a total cost of £9.45 million. AECOM's Funding and Delivery Plan, indicates that £3.60 million (38%) of the total cost will be funded by the Stroud Local Plan sites, with the Whaddon allocation contributing £529,978 of this cost (5.6%). It is noted that these costs are currently estimated and subject to change. <p>The IDP notes the remainder of transport impacts on J12 are from economic growth and strategic development sites and small / windfall development sites in neighbouring authorities such as the Joint Core Strategy Area. It identifies that funding of the remaining £5.85 million should be provided from</p>	<p>Comment noted. The IDP is a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.</p>



neighbouring authorities.
 The level of contribution attributed to the Whaddon allocation has been determined based on traffic flows (select link analysis) through J12. However, any future planning application associated with the Whaddon Allocation would include a detailed and site specific Transport Assessment, so any proportional impact and therefore contribution would be determined better through the development control process.

- Active Travel Package - The active travel package on the B4008 includes an off-road multi-user route parallel to the B4008 between little Harefield (M5 J12) and Stonehouse Corridor. This scheme is also identified in the Stroud Local Cycling & Walking Infrastructure Plan (March 2022).
 The route provides connections between J12 and Stonehouse. At the point where it meets Stonehouse is approximately 8 miles from the Whaddon Allocation site. It is our view that whilst this scheme would lead to a reduction in base traffic in the area that it affects, it is unlikely to directly benefit the Whaddon Allocation directly or indirectly.
 Cycle or walk trips between Whaddon and employment sites in Stonehouse will be relatively low and the distance is above recommended cycle catchments with LTN 1/20 making this journey unlikely.
 Instead, the Whaddon contribution would be better focused on sustainable transport infrastructure in the vicinity of the Whaddon allocation, including the provision of walking, cycling and public transport infrastructure on Naas Lane, a multi-modal

Comment noted.



<p>interchange and sustainable transport improvements on links towards Gloucester City Centre.</p>	
<ul style="list-style-type: none"> • A38 / Epney Road - The recommend changes in Table 1 of the Arup IDP, suggest that the Mitigation Strategy is amended to be a contribution towards a GCT-led scheme, with SDC to promote active travel / public transport to mitigate local plan impact. Whilst we agree with this approach, any future planning application associated with the Whaddon Allocation would include a detailed and site specific Transport Assessment, so any proportional impact and therefore contribution would be determined better through the development control process. 	<p>As per the above response, the IDP and Funding and Delivery Plan are a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.</p>
<ul style="list-style-type: none"> • St Barnabas Roundabout - The recommend changes in Table 1 of the Arup IDP, suggest that the Mitigation Strategy is amended to include a contribution towards a GCT-led scheme, with SDC to promote active travel / public transport to mitigate local plan impact. In addition, it is noted that the developer is to review mitigation options, including sustainable travel mode approach, concept design and modelling approach. The documents reviewed need some clarifying in relation to the delivery of any St Barnabas improvement. Table 1 of the Arup IDP and Paragraph 2.12 of the AECOM Funding and Delivery Plan suggest that St Barnabas Roundabout is likely to be delivered solely by the Land at Whaddon allocation. However, cost provided at Appendix A of the Arup IDP suggest the St Barnabas improvement would be funded through contributions by the Whaddon Allocation, South of Hardwicke (G1) and Hunts Grove Extension (PS30). Can this be clarified? 	<p>The Funding and Delivery Plan sets out that the sole site, G2 Land at Whaddon from the Stroud District, is expected to contribute towards improvements at St Barnabas Roundabout. Further work will be required to determine the scope of improvements at the roundabout.</p>



	<p>It is also not clear whether junctions on the A38, of which St Barnabas is one, have been grouped together and then the total costs has been split between Land at Whaddon (G2), South of Hardwicke (G1) and Hunts Grove Extension (PS30).</p>	
	<ul style="list-style-type: none"> A38 / A430 / B4008 / Cole Avenue <p>The recommend changes in Table 1 of the Arup IDP, suggest that the Mitigation Strategy is amended to be a contribution towards a GCT-led scheme, with SDC to promote active travel / public transport to mitigate local plan impact.</p> <p>Whilst we agree with this approach, any future planning application associated with the Whaddon Allocation would include a detailed and site specific Transport Assessment, so any proportional impact therefore contribution would be determined better through the development control process.</p>	<p>As per the above response, the IDP and Funding and Delivery Plan are a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.</p>
Individuals	Summarised comments	Stroud District Council Response
Individual (6) PS36	<ul style="list-style-type: none"> The traffic forecasts for PS36 are extremely worrying - multiple mentions of roads exceeding capacity. 	<p>The IDP identifies a number of significant improvements to help mitigate increases in transport and highways movements arising from development. The Aecom Funding and Delivery Plan seeks to understand how these schemes could be delivered and funded.</p>
	<ul style="list-style-type: none"> There is still no plan to provide dentistry services in PS36 - a new doctor's surgery, if it can even be properly resourced (there is history of high turnover in Marybrooke) will not provide these services. 	<p>As per the 2021 IDP, funding new or improved dentist surgeries and care homes is likely to be a private business decision, and unlikely to rely on planning obligations or other forms of developer funding unless a development would result in significant pressure on a particular service.</p>
Individual (10) PS24/ PS25/ PS27/PS28	<ul style="list-style-type: none"> Real concerns about the huge increase in traffic volume. 	<p>The IDP identifies a number of significant improvements to help mitigate increases in transport and highways movements arising from development. The Aecom Funding and Delivery Plan seeks to understand how these schemes could be delivered and funded.</p>



Individual (14) PS37	<ul style="list-style-type: none"> A number of items of infrastructure are not mandated and on past experience will not happen, such as: The bridge over the M5, Timely provision of a school, Assessment of the flooding problems. 	The IDPs establish the principle that mitigation should be provided to improve infrastructure where development impacts occur. Appendix A of the IDP Addendum identifies expected infrastructure projects to be delivered through site allocations, however this list is not exhaustive and could likely change through iterations of the DM process.
	<ul style="list-style-type: none"> A number of Wisloe specific infrastructure costs are not included, such as: moving the high pressure gas pipeline, noise bunds, flood ponds. It should also be noted that the proposers estimates for these measures are very low and require close scrutiny. 	The IDP Addendum 2022 sought to review key 'showstoppers' for the Strategic Sites Allocations only. Site specific design considerations will be dealt with through pre app discussions and the development management process. Abnormal infrastructure costs are accounted for within the viability assessment work.
Individual (16) PS33/PS35/PS36/ PS37/BER16/17	<ul style="list-style-type: none"> The traffic light improvements will not fix the issue of the road being too narrow for existing traffic let alone the increase from the new developments. 	Comment noted.
	<ul style="list-style-type: none"> There is a need for shops, schools and a proper long term highway solution to get traffic in and out of Berkeley and Sharpness without using Alkington lane or the B4066. 	Comment noted.
Individual (17) PS24/PS25 CP2/CP3/CP5/CP8/C P9/DCH1/ DCH4/ DCH5/DCH6/DCH7/C P11/EI11/EI14/ EI16/CP14/ES3/ES4/ ES6/ES7/ES8/ES12	<ul style="list-style-type: none"> The IDP should demonstrate a holistic and by definition planned not the piecemeal approach demonstrated otherwise residents, representatives, experts (and inspectors) can not judge the IDP 	The 2022 IDP Addendum considers all of the strategic site allocations and the 2021 IDP considers all development across all infrastructure topics, in accordance with the NPPF. The IDP and Funding and Delivery Plan utilises approaches such as apportionment to provide a joined-up approach that ensures developers contribute their 'fair share' towards mitigation.
	<ul style="list-style-type: none"> SDC present a local plan that is 'big' on housing but an IDP that does not recognise current reality, is weak on employment opportunities, unsound on environmental and flooding risk assessment and mitigation and dysfunctional on supporting infrastructure especially strategic transport (highlighted under Q8), education and medical infrastructure. 	Comment noted. The Council considers the IDP and supporting documentation relating to environmental, flooding and transport issues to be well prepared and a good basis for assessing the strategic requirements for development set out in the Local Plan. More detailed assessment work will be required at the planning application stage.



<ul style="list-style-type: none"> Sequencing of and understanding of trigger points for provision must be made clear and state what would then happen if provision is delayed or not even provided due to the stated funding uncertainties or detailed assessments needed. 	<p>The IDP and Funding and Delivery Plan are a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.</p> <p>These matters will be addressed through the masterplanning, pre-app and planning application stages in consultation with the relevant infrastructure providers.</p>
<ul style="list-style-type: none"> Crucially, existing development impact that has yet to be mitigated or where infrastructure support has not been provided must be acknowledged as the base line and future development and cumulative impact must be then assessed beyond that in totality. 	<p>The 2021 IDP clearly sets out the baseline position for infrastructure across all infrastructure types and topics. This data and baseline are provided by the relevant infrastructure providers as well as through a thorough literature review.</p> <p>It is not the role of either the Local Plan process or development management to secure infrastructure for existing developments. This would not meet the tests of being reasonable and related to the development.</p>
<ul style="list-style-type: none"> Additional Surgery capacity and Dental capacity must be provided at an accessible location to PS24 and Box Road. 	<p>The CCG was consulted as part of the 2021 IDP process. They advised that the Cam North West site allocation is likely to be of sufficient size to warrant creation of a new doctors' surgery onsite, There is likely to be additional demand for a further 166sqm of dentist surgery space at an estimated cost of circa £291,000.</p> <p>The CCG's Primary Care Infrastructure Plan outlines that the CCG is exploring development options for the Cam & Uley Family Practice. The development options include the possible expansion of premises at the existing site, together with associated facilities such as parking. The practice has been in contact with the CCG around potential funding mechanisms.</p>



	<ul style="list-style-type: none"> Other options for education provision which must include preschool need to be developed and assessed against the piecemeal wait and see option proposed. 	<p>The application of additional dwellings at North East Cam is expected to provide a contribution towards additional primary school places in the area, however there are limited options to expand Dursley C of E Primary Academy following its recent expansion.</p> <p>The strategic development site at North West Cam would create the need for a new one form of entry primary school. Each of these sites could accommodate pre-school provision, if deemed necessary by the LEA.</p>
	<ul style="list-style-type: none"> Infrastructure to enable and encourage local employment opportunities need to be urgently addressed in order for this community to be more than a dormitory. 	<p>The emerging Local Plan allocates employment sites and mixed use development sites.</p>
	<ul style="list-style-type: none"> There is no recognition of the recent flooding in Slimbridge due to run off from the site and no effective plan to deal with the increased risk of flooding and sewerage problems. 	<p>This has been considered through the EB54 Strategic Flood Risk Assessment Level 2 (2021) and appendices'. The 2021 IDP makes clear that a site-specific flood risk assessment will be required.</p>
	<ul style="list-style-type: none"> The improvements to public transport and the provision of a cycle/pedestrian bridge over the M5 need to be mandated. 	<p>Appendix A of the IDP Addendum identifies expected infrastructure projects to be delivered through site allocations, however this list is not exhaustive and could likely change through iterations of the DM process.</p>
	<ul style="list-style-type: none"> The site has specific additional costs due to the high pressure gas pipeline, the 40 ft bunds to reduce noise. The overall infrastructure costs are very optimistic so there is no guarantee all will be delivered. 	<p>The IDP and Funding and Delivery Plan are a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.</p>
Individual (25) PS24/PS25/PS37	<ul style="list-style-type: none"> IDP is incomplete and not assessed full impacts upon existing infrastructure across the period. The increase of traffic reports solely in terms of impact to A38 and Motorway, despite recognising the significant bottlenecks that would occur, which would replicate through Cam, Dursley & Slimbridge. Neither 	<p>The IDP Addendum 2022 sought to review key 'showstoppers' for the Strategic Sites Allocations only.</p> <p>The IDP and Funding and Delivery Plan are a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions</p>



	<p>is regard given to the WEst-East traffic increase as people travel from West of A38, across limited bridges, to the significant facilities in the Dursley/Cam area that are the closest ones (Supermarkets, Sports centre etc). Specifically, the impact upon the lifespan of the existing Bridge over the railway at Cam on the A4135 is still not mentioned or mitigated, leaving a ticking bomb unrecognised in the centre of the transport web.</p>	<p>should also be calculated based on more accurately assessed development impacts.</p>
<p>Individual (26) PS33/PS34/BER16/BER17</p>	<ul style="list-style-type: none"> There is no infrastructure here. Berkeley vale community school was closed. Bank, police station and hospital also closed. Primary schools are full. Very minimal parking in the town of Berkeley. Roads are narrow. 	<p>Appendix A of the 2022 IDP addendum identifies a number of infrastructure projects that should be delivered as part of the developments at Sharpness (PS34, PS36).</p>
	<ul style="list-style-type: none"> Any planning consent from this day forward on all buildings should have a condition of compulsory installation of solar panels on the roof. 	<p>The emerging Local Plan and accompanying evidence provide opportunities for renewables within development.</p>
<p>Individual (30) PS37</p>	<ul style="list-style-type: none"> Two sites (PGP/PGP2) were not selected for inclusion in the DLP despite both sites being more sustainable than PS37, they are; on the A38 corridor, nearer to major areas of employment, adjacent to M5 junctions and not requiring the same level of infrastructure investment. 	<p>The emerging Local Plan evidence base details the site selection process and outcomes including Sustainability Appraisal of all sites.</p>
	<ul style="list-style-type: none"> The site-specific infrastructure costs, to be borne by the developer, which include; moving the high-pressure gas pipeline, generating 40 ft embankments, noise attenuation fences, flood ponds etc. are not underwritten by a developer. Until these promoter's estimates are validated by a developer the submission should be considered optimistic, significantly underestimating the true costs. The combination of CIL contribution and site-specific realistic infrastructure costs apportionment will lead 	<p>The IDP and Funding and Delivery Plan are a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.</p>



	<p>to PS37 houses needing to be relatively expensive to recover the investment, putting pressure on achieving the mandated number of affordable homes.</p>	
	<ul style="list-style-type: none"> All site-specific infrastructure capital schemes and ongoing support costs which underpin the improvement assumptions (foot/bike bridge, local schools to match housing numbers, new local centre and Dr surgery/dentist etc) must be mandated as part of DLP. 	<p>Appendix A of the 2022 IDP addendum identifies a number of infrastructure projects that should be delivered as part of the developments. The IDP and Funding and Delivery Plan are a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.</p>
	<ul style="list-style-type: none"> Recent (2020) Slimbridge flooding experience caused by Lighenbrook is not recognised. A full flood, drainage and sewage assessment must be mandated for the Wisloe site prior to inclusion in the DLP. 	<p>This work has been considered through the EB54 Strategic Flood Risk Assessment Level 2 (2021) and appendices'. The 2021 IDP makes clear that a site-specific flood risk assessment will be required.</p>
	<ul style="list-style-type: none"> PS37 should be removed from the DLP and a more sustainable site (PGP1 or PGP2) with fewer inherent issues substituted in preference. 	<p>The emerging Local Plan evidence base details the site selection process and outcomes including Sustainability Appraisal of all sites.</p>
Individual (31) PS37	<ul style="list-style-type: none"> Flooding is an issue for Slimbridge and again this appears to be being 'played down' by the developers. There needs to be a comprehensive assessment before the Wisloe site is included in the plan. 	<p>This has been considered through the EB54 Strategic Flood Risk Assessment Level 2 (2021) and appendices'. The 2021 IDP makes clear that a site-specific flood risk assessment will be required.</p>
	<ul style="list-style-type: none"> There are two far more sustainable sites which SDC have chosen to exclude from the plan even though they are more sustainable, lower costs and have builders ready to start building. 	<p>The emerging Local Plan evidence base details the site selection process and outcomes including Sustainability Appraisal of all sites.</p>
	<ul style="list-style-type: none"> Foot/ cycle bridge over M5, primary school and sufficient places at other local and secondary schools, doctor and dentist surgery, bus and rail improvements should be mandated in the Local Plan rather than wait for a planning application. 	<p>Appendix A of the 2022 IDP addendum identifies a number of infrastructure projects that should be delivered as part of developments. The IDP and Funding and Delivery Plan are a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.</p>



	<ul style="list-style-type: none"> It should also be considered to make Dursley Road a 'no through road' With no builder/developer on board there are lots of proposals (the moving of the gas pipeline, provision of embankments and noise attenuation barriers between the site and the M5) not funded and are crucial to this site being developed. 	<p>Comment noted. Detailed matters will be addressed at the masterplan/planning application stage.</p> <p>Appendix A of the 2022 IDP addendum identifies a number of infrastructure projects that should be delivered as part of the developments. The IDP and Funding and Delivery Plan are a starting point for assessing infrastructure requirements, and further work will be required at the development management stage. Contributions should also be calculated based on more accurately assessed development impacts.</p>
Individual (33) PS37	<ul style="list-style-type: none"> The IDP is constructed around a 'A38/M5 sustainable transport corridor.' Stroud District Council have already rejected two sites with better access to the M5 than Wisloe, namely Whitminster (PGP2) and Moreton Valance (PGP1). Furthermore, both these two sites are close to main areas of employment and require lower levels of infrastructure development. The Wisloe site requires massive infrastructure costs from the developer which will impact the deliverability of the site. these include relocating a high pressure gas pipeline, and noise reduction measures such as 40ft high embankments and fencing. the cost of these works will need to be recovered through the sale of housing which will put pressure on the reducing the number of affordable homes on the site. 	<p>These two sites are not more sustainable or deliverable than site PS37. Document EB9 Topic Paper - Assessment & selection of sites October 2021 sets out how the Local Plan sites were selected. The Sustainability Appraisal considers alternatives and the IDP provide evidence on infrastructure required to support the Preferred Growth Strategy.</p> <p>These are abnormal costs and are not uncommon for strategic sites. Document EB111 sets out how abnormal costs are dealt with in viability appraisals. Site PS37 performs better in viability terms than most of the strategic housing sites tested.</p>
Individual (40) PS33/BER16/17/PS34 PS35/PS36	<ul style="list-style-type: none"> The road infrastructure is insufficient. Early mornings m5 junctions already full. Parking at cam Dursley station already full. Country lanes are not used to extra volume. 5,000 houses could mean 10,000+ cars. They shut the secondary school, bank, hospital and police station. Very limited services, all at breaking point. Insufficient parking in Berkeley town Schools at full capacity 	<p>The IDPs establish the principle that mitigation should be provided to improve infrastructure where development impacts occur. Appendix A of the IDP Addendum identifies expected infrastructure projects to be delivered through site allocations, however this list is not exhaustive and could likely change through iterations of the DM process.</p>



<p>Individual (43) PS33/BER16/17/PS34 PS35/PS36/PS37</p>	<ul style="list-style-type: none"> The viability of the plan relies heavily on s106 contributions to the cost of the new schools, health and leisure amenities. However given that the existing facilities are already oversubscribed or non-existent what assurances can be given that any new facilities will be a condition of any first planning phases to avoid exacerbating this? 	<p>The IDPs establish the principle that mitigation should be provided to improve infrastructure where development impacts occur. Where possible, notes have been provided as guidance to identify where infrastructure should be provided as part of the early phases of development.</p> <p>Appendix A of the IDP Addendum identifies expected infrastructure projects to be delivered through site allocations, however this list is not exhaustive and could likely change through iterations of the DM process.</p>
<p>Individual (44) PS24/PS25</p>	<ul style="list-style-type: none"> No mention of the A4135 Cam Pitch roundabout being already over capacity and any opportunities to mitigate the problem with the increased traffic. Outcome of feasibility study for the Greenway should be known prior to such support and reliance upon the delivery of the cycleway As recognised in PPG25 and PPS25, the need for flood catchments to be considered holistically with regard to cumulative impacts of multi-parcel developments adjacent to one another to be considered together, the impact upon the River Cam should be assessed using hydraulic modelling to ensure compliance with these policies. Jubilee field drainage, no methods of mitigation suggested to ensure adjoining new homes do not have negative impact upon existing problems at the sports ground. The lack of preschool facilities within the parish has been a considerable factor for many working parents who live in the parish. The omission of any secondary school requirement to be delivered could be argued as short sighted when the existing secondary school is already full to capacity. 	<p>These issues are addressed in EB98 Traffic Forecasting and EB108 Sustainable Transport Strategy.</p> <p>PPS25 and PPG25 have been superseded, flooding issues are addressed through the EB54 Strategic Flood Risk Assessment Level 2 (2021) and appendixes. This work is compliant with the NPPF and NPPG.</p> <p>The IDPs establish the principle that mitigation should be provided to improve infrastructure where development impacts occur.</p> <p>Appendix A of the IDP Addendum identifies expected infrastructure projects to be delivered through site allocations, however this list is not exhaustive and could likely change through iterations of the DM process.</p>



	<ul style="list-style-type: none"> Cam/Uley Practise (Orchard Medical Centre) has been expanded to capacity and there would be extremely limited options to deliver a bigger practise at their current location. Difficulties in obtaining appointments and car parking restrictions for our growing community has been reported many times at the parish council offices. A new GP surgery is needed 	<p>The CCG was consulted as part of the 2021 IDP process. The CCG's Primary Care Infrastructure Plan outlines that the CCG exploring development options for the Cam & Uley Family Practice. The development options include the possible expansion of premises at the existing site, together with associated facilities such as parking. The practice has been in contact with CCG around potential funding mechanisms.</p>
Individual (50) PS33/PS34/PS35/PS36	<ul style="list-style-type: none"> Massive financial input needed to provide appropriate infrastructure 	<p>The IDP establishes the principle that mitigation should be provided to improve infrastructure where development impacts occur. In many cases, financial support will be required from developers or for developers to deliver infrastructure themselves.</p>
Individual (59) PS24/PS25/PS37	<ul style="list-style-type: none"> Important issues are missing from the report, evidence for the conclusions is inaccurate and not holistic. 	<p>Comment noted.</p>
Individual (60) PS24/PS25/PS37 CP2/CP3/CP4/CP5/C P6/CP8/CP9/DHC2/ HC3/DHC3/HC1/DHC 5/DHC7/CP11/EI1/EI 7/EI11/EI12/DEI1/EI 13/EI14/EI16/CP14/C P15/ES1/ES2/DES3/E S3/ES4/ES5/ES6/ ES7/ES8/ES9/ES10/E S12/DES2	<ul style="list-style-type: none"> The infrastructure delivery plan does not provide a sustainable workable transport link. It is not deliverable as there is no evidence of commitment to fund these (or how the costs have been estimated). No information on how this may be constructed ie a dream of a foot and cycle bridge across the M5. 	<p>The IDP Addendum 2022 sought to review key 'showstoppers' for the Strategic Sites Allocations only. Appendix A of the IDP Addendum identifies expected infrastructure projects to be delivered through site allocations, however this list is not exhaustive and could likely change through iterations of the DM process.</p> <p>The 2021 IDP considers STS and range of sustainable transport measures.</p>
	<ul style="list-style-type: none"> The proposed Slimbridge roundabout (A38) improvements are insignificant both in how they could deal with tens of thousands of addition car owners from P24 and P25 let alone PS37, and how it has been costed. 	<p>The proposed improvements have are derived from the STS and the LTP and informed by transport modelling information.</p>
	<ul style="list-style-type: none"> In addition to external infrastructure there are significant internal and additional infrastructure which is specifically required for PS37. Not only has this cost not been factored in making it an unviable 	<p>Appendix A of the IDP Addendum identifies expected infrastructure projects to be delivered through site allocations, however this list is not exhaustive and could likely change through iterations of the DM process.</p>



	<p>site, these would all need to be done before construction.</p>	<p>Abnormal costs are not uncommon for strategic sites. Document EB111 sets out how abnormal costs are dealt with in viability appraisals. Site PS37 performs better in viability terms than most of the strategic housing sites tested.</p>
<p>Individual (62) PS37</p>	<ul style="list-style-type: none"> We have found nothing in these new documents to reduce our concerns as previously expressed, particularly in respect of transport and flood risk. In fact, our concerns have increased as a result of your apparent determination to press on without any evidence that transport infrastructure will be adequate. 	<p>Comment noted.</p>
<p>Individual (72)</p>	<ul style="list-style-type: none"> Education - GCC numbers have been called into question both financially and pupil numbers and reality of what is actually required massaged down 	<p>A review of PPRs is being undertaken by the LEA which will seek to ensure that the PPRs are a more accurate reflection of current educational infrastructure needs.</p>
	<ul style="list-style-type: none"> Flood Management & Drainage - There is considerable concern amongst residents of Rowley, Court House Gardens and Box Road that flooding risk has not been satisfactorily investigated. The required cumulative impacts have not been considered and the exception test has not been carried out. The technical detail to determine if PS25 should even be considered at all for development given flood risk and sensitivity has simply not been presented in this update or original documents. The recommendations in Planning Policy Statement Practice Guide 25 (Taking Flood Risk Into Account In The Planning Process) have not been followed or referenced. This recommends detailed considerations at an early stage and especially for such a sensitive site that should be done now and not wait for outline or actual planning applications. 	<p>This work has been considered through the EB54 Strategic Flood Risk Assessment Level 2 (2021) and appendices. The 2021 IDP makes clear that a site-specific flood risk assessment will be required.</p>



	<p>The statements in this addendum bear no resemblance to the concerns raised in the SFRA and are therefore dismissive and do not take the SFRA technical detail seriously or give it its statutory place in this IDP.</p>	
	<ul style="list-style-type: none"> Health & Social Care - PS24 & PS25 No real commitment for additional doctors surgery, rather an extension to an already over capacity Cam & Uley surgery. No mention of dentist provision, there is currently a two year waiting time for a dentist in Cam and Dursley surgeries are not taking on private patients let alone NHS, the situation is dire in the area. 	<p>The CCG was consulted as part of the 2021 IDP process. The CCG's Primary Care Infrastructure Plan outlines that the CCG exploring development options for the Cam & Uley Family Practice. The development options include the possible expansion of premises at the existing site, together with associated facilities such as parking. The practice has been in contact with CCG around potential funding mechanisms.</p>
Individual (80,86)	<ul style="list-style-type: none"> Education - There is no provision mentioned for pre-schools. The two nearest primary settings (Cam Hopton + Cam Everlands Schools) are over subscribed by as many as 100 per year. How then will increase in families not exasperate this problem. Cam Hopton classrooms are already too small to accommodate 30 pupils, class sizes cannot increase. SDC does not have a plan to tackle this real problem. Originally in PS24 proposal there was a new primary school, but there has been no allocation of funding to build this so will either not happen or will have a waiting of many, many, many years which mean new families will have to travel outside of the area for schooling which will increase pressure on transport links/infrastructure and negatively impact on the cohesion of the community. Rednock currently serves the wider catchment of the surrounding villages and small towns. The only way the school can accommodate the increase pupil 	<p>The IDPs establish the principle that mitigation should be provided to improve education infrastructure where development impacts occur. Each of the Strategic Site Allocations considered in both IDPs have costs and pupil product numbers attached to them. It is expected that developers address these through their developments, or provide evidence to the contrary.</p>



	<p>numbers is by reducing the catchment area. Local children will be shipped to Quedgeley and Stroud – more negative impact on transport and community cohesion.</p> <p>If you look at original PS25 proposal and the proposed number of new children needing access to school being around 69 which non of the primary schools could cope with is now essentially double that if there is a go ahead to allow 315 homes to be built in the same space</p>	
	<ul style="list-style-type: none"> • Flood Management & Drainage - We have great concerns that if PS25 goes ahead that this will mean that the river will burst its banks regularly and cause flooding to the homes running along the river (inc Everlands, Court House Gardens, Draycott, Box Rd). If you look at this graph that documents the river levels you will see how often the levels have been high since work started on Littlecombe. I believe none of this data has been looked at as part of this proposed development, although readily available on the Internet. <p>if fields are taken away the run off will go directly into the tiny river thus causing flooding to current residents. There are also 5 known springs in the fields proposed for PS25 – what is the impact when they are tarmaced over? Where will the water go? What effect will this have?</p> <p>The recommendations in Planning Policy Statement Practice Guide 25 (Taking Flood Risk Into Account In The Planning Process) have not been followed. I do not believe that the PS25 proposal will keep any of the site drainage proposals, planting etc, especially now with increased house numbers (180-315). Who</p>	<p>This has been considered through the EB54 Strategic Flood Risk Assessment Level 2 (2021) and appendices.</p> <p>The 2021 IDP makes clear that a site-specific flood risk assessment will be required.</p> <p>In accordance with the NPPF, development would need to be sequentially located away from areas of most flood risk. Only if the sequential test is demonstrated, then the exception test would be triggered and mitigation required. This requires further detail and should therefore be address at the planning application stage (or during pre-app).</p>



	<p>would enforce these works? It will be a disaster that would affect both housing along the river line and the many local businesses including Tesco and The Draycott Industrial Estate.</p> <p>Sewage in the River Cam is now a real problem and is documented from the Dursley – Station Road point by the River Trust who have documented that in 2021 this sewer storm overflow spilled 6 times for a total of 5 hours, discharging straight into the River Cam. This will only increase with more building as pipes can not cope with increase in number of homes.</p>	
	<ul style="list-style-type: none"> Health & Social Care: I have not read any compelling information that there will be improvements to the already stretched Health and Social Care in Cam. Cam and Uley surgery has no space to expand the building to serve the growing population, never mind actual staff – why is there not a plan for new GP surgery? The local dentist is not taking NHS patients and is now owned by BUPA. Where will an NHS dentist be situated? 	<p>The CCG was consulted as part of the 2021 IDP process. The CCG's Primary Care Infrastructure Plan outlines that the CCG exploring development options for the Cam & Uley Family Practice. The development options include the possible expansion of premises at the existing site, together with associated facilities such as parking. The practice has been in contact with CCG around potential funding mechanisms.</p>
Individual (85)	<ul style="list-style-type: none"> 3.2.1 states there will be a pinch point at the A38/A4135, a pinch point here already exists. The existing drainage/sewage system can't cope around Cam. There are not enough doctors/dentist planned for and PS24&PS25 	<p>The CCG sets out that the Cam North West site allocation is likely to be of sufficient size to warrant creation of a new doctors' surgery onsite.</p> <p>The CCG's Primary Care Infrastructure Plan outlines that the CCG exploring development options for the Cam & Uley Family Practice. The development options include the possible expansion of premises at the existing site, together with associated facilities such as parking. The practice has been in contact with CCG around potential funding mechanisms.</p>



<p>Individual (87)</p>	<ul style="list-style-type: none"> There is no concrete evidence for increased provision for Doctors, dentists or general healthcare, instead they are relying on the already overstretched surgeries and private provision for dentistry. The majority of local schools are over subscribed, forcing local residents further afield, little or no pre school allocation and nursery schools all privately funded. There are no premises or provisions shown for these vital services. Partly down to lack of any employment provision within these developments, which will cause further suffering to local residents as more places are taken by these new houses due to lack of capacity in this already stretched sector 	<p>The IDPs establish the principle that mitigation should be provided to improve infrastructure where development impacts occur.</p> <p>Appendix A of the IDP Addendum identifies expected infrastructure projects to be delivered through site allocations, however this list is not exhaustive and could likely change through iterations of the DM process.</p>
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