

Appendix 1

Proposed changes to draft SPG

Para 5.2; insert 'and unless otherwise agreed' to amend paragraph to read as 'In practice, and unless otherwise agreed, it may fall to the Council to carry out most of the road's actual design and construction, given there are no other development sites requiring access to DEAR, although the majority of funding will come from developer contributions.'

Reason: Partly in response to Bett Homes to clarify the likely share of responsibility between Bett and the Council in constructing the road jointly.

Para 5.5, last sentence: delete 'potential' and add after 'cost' 'as a further developer contribution if justified'

Reason: in response to Bett Homes to avoid any misconceptions about the nature of the contribution provided by the construction of the section of DEAR which provides access to Mydub.

Map 1: Proposed Design for DEAR: replace with scheme for planning application P/12/0546/FUL

Reason: in response to Bett Homes to accurately reflect the most up to date design proposal for the road

SUMMARY OF RESPONSES TO DRAFT SUPPLEMENTARY PLANNING GUIDANCE NOTE:
DELIVERY OF DENNY EASTERN ACCESS ROAD

Organisation	SPG Para/ Section	Comment	Proposed Response
Bett Homes	Non-specific	Bett Homes welcome the opportunity to respond to the consultative draft. Bett Homes is uniquely placed to help deliver DEAR. The firm intends to construct part of DEAR which will be built in phases, and may also be responsible for constructing a further part of DEAR, or for financial contributions to the remainder of DEAR.	Confirmation of Bett's role in constructing DEAR is welcomed, particularly if proposed Mydub 2 site is confirmed through the LDP process.
	Para 2.3	<u>Rationale for proposing DEAR</u> Para 2.3 says road has two functions, but the one stating ' <i>to provide access to the proposed Mydub site</i> ' is not accurate and should be deleted. Existing congestion, and future congestion from all sites with traffic passing through Denny Cross, are the reason why DEAR is required. Access off DEAR to other development is a secondary function and is not the rationale for a relief road of the proposed specification.	Not accepted. While the road was conceived to provide relief to Denny Cross it was also seen as a key requirement to facilitate settlement expansion to the east and south-east of Denny, as envisaged in the Falkirk Council Structure Plan. The dual purpose of DEAR, to relieve congestion at Denny Cross and provide access to housing at Mydub has been stated consistently in iterations of the FCLP since 2003.
	Para 3.3 – 3.4	<u>Approach to Cost Sharing</u> Bett Homes supports the principle that sites should be required to make a contribution to the delivery of DEAR <i>...if the traffic generated were likely to make an impact on Denny Cross.(Para. 3.4)</i> However Bett do not agree with the impact of traffic on DEAR also being taken into account and state that the apportionment of cost should be based on impact on Denny Cross only	Not accepted. It is a tried and tested principle in dealing with developer contributions for road schemes to take account of projections of the use of the road by future traffic from benefitting sites in apportioning a share of costs. Bett's position at the Local Plan Inquiry was that there was a clear distinction between those sites which can only provide contributions and the Mydub site which was intended to act as 'enabling development' to fund the construction of DEAR, primarily because the development utilised the DEAR as a local distributor road to access the site.

	Para 3.6 – 3.7	<p>The cost plan for DEAR should be made available on a confidential basis to those sites which are expected to contribute. This information is of particular relevance to Bett Homes as its contribution to DEAR is not only a financial contribution, but also includes, or will include, the following costs:</p> <ul style="list-style-type: none"> • the design costs incurred; • costs for surveys and studies required, including intrusive site investigation; • costs for securing consents; • construction costs for the section of DEAR which Bett Homes will be undertaking directly; • land acquisition costs. <p>The costs for DEAR should be updated to reflect the current proposal as submitted for planning permission and RCC.</p>	<p>The total cost of £6,913,525 shown in the SPG is the most up to date as estimated by the Council's Engineering Design team and include a prudent 'optimism bias' allowance i.e. worst case scenario. The Council is happy to share these with Bett and any other developer and they will be updated to reflect costs whenever construction takes place. However the Council does not accept that Bett has incurred all of the costs listed, as some of these have already been borne by the Council in working up its design for the road e.g. design costs, surveys and studies. The scope for sharing of other costs listed can be discussed. The scheme submitted by Bett draws heavily from the Council's own work and only minor changes have been made by Bett to the Council's layout. Land acquisition costs are included in the costs of the scheme as a contingency and the costs of any land acquired by Bett for the section of road that they intend to build can obviously be deducted.</p>
	Section 4	<p><u>Calculating share of costs between sites</u></p> <p>Bett Homes contend that a planning obligation drawn up on the basis of the SPG table may not meet the test of Scottish Government Circular 3/12. In particular the tests of 'Scale and Kind' and 'Reasonableness' are queried</p> <p>In defining the scale of the contribution, the Council must satisfy itself that the obligation does not adversely affect the viability of the contributing site(s), and should adopt a flexible approach not only to the timing of the contribution, but also to the scale of the contribution. Alternatively it must be prepared to reduce other agreements or conditions relating to infrastructure provision that may otherwise apply to development, in particular affordable housing requirements or education requirements.</p>	<p>Negotiations on a planning obligation are part of the planning application process and the tests set out on Circular 3/12 will be assessed at that stage. The scale of the contribution is defined in the table on p7 and is clearly related to the total cost of the project. Any alteration/reduction to Bett's share will result in an automatic increase for other sites.</p> <p>The SPG states at para 4.5 that the Council is aware of market fragility and will adopt a flexible approach to the timing, if not the scale of contributions, including contributions for other community infrastructure. It is open to Bett to submit a development viability statement to support their concerns on viability through the planning application process. The Council is not in a position to assess an individual development proposal's viability unless it is brought into an open book site appraisal process.</p> <p>Bett's suggested change to the SPG that '.. the Council may be required to fund any shortfall which arises from securing planning obligations from contributing sites' is not accepted.</p>

	Para 4.2	<p>This paragraph states that the Council has carried out and paid for '<i>detailed design work and studies for the project....to facilitate the submission of a planning application for the whole project</i>'. Bett contend that they have also done this work for their planning application and request that this statement should be deleted from the draft SPG.</p> <p>A further change to add in the clause in relation to developer contributions '<i>where these meet the tests of Circular 3/2012</i>' is requested.</p>	<p>The sentence is accurate insofar as the Council has carried out design work for the whole road, which was originally carried out for an application by the Council that was later withdrawn. This work has been shared with Bett's engineering consultants. The statement is valid and should remain in the SPG.</p> <p>The request to add the additional clause in regard to Circular 3/2012 is not accepted. Reference to S75 obligations conforming to Circular 3/2012 is already made elsewhere in the draft SPG at para 4.1</p>
	Para 5.2 and Map1	Bett request an addition and a deletion from the paragraph and also request that Map 1 be altered to reflect the scheme which is the subject of Bett's planning application	These additions and deletions are accepted. The replacement of Map1 will be acceptable provided the Bett scheme conforms to Council's roads standards and scheme requirements.
	Paras 4.4, 5.1 and table on p7	<p>Bett dispute the methodology for calculating the percentage share of construction costs allocated to each site, insofar as they contend that an allowance for the usage of DEAR by traffic should not be included and that impact on Denny Cross should be the sole criterion. Bett acknowledge that 100% of the traffic from Mydub would use DEAR for access purposes, but that the distribution of this traffic is around Denny, with only part of the traffic going through Denny Cross.</p> <p>Bett also contend that the original cost proportioning model was developed c.2004 by Atkins on behalf of Falkirk Council and that this is now out of date and should be updated. They request that the whole of the table on p7 is revised to conform to their suggested methodology.</p> <hr/> <p>In a further response dated 10.06.13 Bett have provided their own calculations of traffic impact and apportioned costs to sites. They did this because they believe the Council's calculations to be partial and inconsistent.</p>	<p>As stated in para 3.2 of the draft SPG Falkirk Council has followed government advice in adopting the cumulative impact approach to apportioning costs of infrastructure to new development. It is valid to include impact on DEAR as well as on Denny Cross.</p> <p>While some modelling of traffic impact on Denny Cross was carried out in 2004 in relation to the application for Denny High School and an inception meeting was held in March 2005 to look at the design and costs of constructing DEAR, Atkins were not involved in any of this process. Atkins only involvement was in submitting a Transport Assessment for the new Denny High School which included test scenarios for Denny Cross with and without DEAR. However detailed modelling and cost apportioning to sites did not take place until 2010 because the final distribution of development sites was contingent on the need to wait for the approval of Falkirk Council Local Plan.</p> <hr/> <p>While Bett acknowledge that the overall cost contribution methodology adopted by Falkirk Council is considered to be acceptable they have reworked the calculations based on their own traffic flow diagrams. This results in a considerable reduction in the contribution from Mydub and the percentage assignment (although missing from their table) equates to approximately 46% instead of 100%. The Carrongrove Mill site has been added back into the table and a new contribution calculated (although the Carrongrove contribution has been agreed</p>

			<p>already through a S75 obligation). The percentage assignment for both Banknock and Dennyloanhead sites have increased as has the former Denny High School site.</p> <p>The Council do not accept Bett's conclusions (and, on the detailed issues, there has been insufficient time to review their flow diagrams).</p>
	Para 4.5	Bett welcome the Council's willingness to be flexible on timing of contributions but request that this flexibility should extend to the scale of contributions as well. They also suggest a new paragraph to cover the refund of money in the event the works do not take place within a prescribed timescale, or if the cost of the works is less than the budget on which the contributions have been agreed.	Extension of flexibility to cover scale of contributions is not accepted. The Council maintains its position that the road is to be developer funded. The issue of refunds of contributions will be covered in the relevant S75 obligations.
	Paras 5.1 and 5.5	Bett Homes supports the principle in paragraph 5.1 of the draft SPG that Bett Homes' total contribution to the overall cost should comprise both the actual construction of part(s) of DEAR, as well as any proportionate financial contribution if justified. They request some clarifying amendments to paragraph 5.5 to avoid any misconceptions about the nature of the contribution provided by the construction of the section of DEAR which provides access to Mydub.	<p>Proportional financial contributions have already been justified of which part will form the access to Mydub and the remainder a financial contribution for the balance, as stated in para 5.1.</p> <p>Proposed clarifying amendments partially accepted.</p>
Denny and District Community Council	Non-specific	Denny and District CC welcome action to support DEAR	Support noted
	Non-specific	With 90% of funding coming from 2 parties (Bett and the Council) the CC hope that these parties can jointly provide a timeline for the project	This can be negotiated through the planning application process.
	Non-specific	Denny and District CC state there is no mention in draft SPG of discussion between Bett and the CC on need to build roundabout on Glasgow road first.	The Council has not been party to discussions between Bett and the CC. However this is an issue being dealt with in the live planning application P/12/0546/FUL
	Non-specific	CC expresses a community view for guarantees that the trees along the route of the boundary will not be disturbed in any way	This is a matter that can resolved through planning applications, not this specific SPG
	Section 5	The discussion of the alternative funding options, particularly statement that <i>'it may fall to the council to carry all of the road's actual design and</i>	The Council's current position is to delivery DEAR through developer contributions, but it is willing to consider other funding options should circumstances change.

		<i>construction'</i> suggests that the SPG strategy is flawed at the conceptual stage	
MacTaggart and Mickel	Non-specific	MacTaggart and Mickel (M&M) believe the roundabout with Glasgow Road and the initial stretch of road required to access the Mydub site should be removed from the overall DEAR calculation. These works are required to access the Mydub site and should be considered as necessary access works to be funded solely by the developer of that site. All other sites which are required to contribute in a similar proportionate manner are being asked to fund their access works separate of the DEAR contribution and it is clearly not appropriate that the Mydub site should be allowed to reduce their DEAR contribution to the value of their access works simply because the site is located on the route.	Accepted that other sites' contributions to DEAR are additional to their costs for providing their own site accesses. The initial stretch of road from Glasgow Road serves a dual purpose of accessing the Mydub site and providing relief to Denny Cross. But it cannot be removed from the overall DEAR calculation as it would still be required even if the Mydub site did not exist.
	Non-specific	No detail has been provided on the rationale for the proposed route alignment, as such, M&M assume that this alignment has been defined to accommodate the Mydub allocation which has considerable implications on the overall scheme cost. It is clear that the most cost effective scheme would be to promote a direct alignment between Glasgow Road and the A883, however, due to the need to accommodate the Mydub allocation the proposed route is far from direct which considerably lengthens the proposed road and therefore increases the cost which should not be borne by competing sites.	The change to the route alignment of DEAR was recommended by the Reporter to the FCLP Local Plan Inquiry and accepted and approved by Council for the adopted FCLP. The route is approx 150m longer than the route shown in the deposit draft FCLP (a 10% increase in route length). In their evidence to the LPI Bett accepted that they would bear the cost of the extra length although this has not been factored into the SPG cost distribution. The realigned route is considered to be the better environmental fit to the landscape.

	Section 4	<p>With regards the methodology for calculating the share of costs between sites, M&M would request that greater clarity is provided on how this has been derived and exactly what the various figures included within the table on Page 7 represent. It would appear that the council have estimated the vehicle generation that they believe will utilise the proposed route from the various sites which have been earmarked to contribute to the scheme and used this information to proportion costs. There has been no detail provided on how the generation or distribution of traffic has been calculated and we believe this information should be available for scrutiny to allow a comprehensive response to the consultation process.</p>	<p>As stated in para 3.2 of the draft SPG Falkirk Council have followed government advice in adopting the cumulative impact approach to apportioning costs of infrastructure to new development. It was agreed at the FCLP Local Plan Inquiry that the level of impact from the Dennyloanhead site was based on trips to the new high school. Carrongrove Mill impact was extracted from the Transport Assessment that was submitted by MacTaggart and Mickel in support of their planning application.</p>
		<p>M&M note that the primary reason for the DEAR is to relieve congestion on Denny Cross, therefore, if that assumption is correct and the cost has been derived from the estimation of traffic utilising the new route then M&M would ask for clarity on how this relates directly to relieving impact at Denny Cross. Without this clarity it is impossible to comment on whether the mechanism for contribution and therefore the percentage contribution to total cost is appropriate and if the proposed methodology satisfies the tests identified in Planning Circular 1/10.</p>	<p>The impact of DEAR on relieving traffic congestion at Denny Cross has been modelled and it is valid, in the calculations of cost share, to include impact on DEAR as well as on Denny Cross. For example, the Carrongrove Mill percentage was calculated from the distribution contained with the Transport Assessment submitted to support the application. It was based on the percentage of traffic that use Denny Cross to travel east on Broad Street which would divert to DEAR.</p> <p>Any S75 obligations drawn up as a result of planning applications will comply with the tests of Circular 3/12 (which supersedes Circular 1/10).</p>
		<p>M&M note the Dennyloanhead site has been assigned 1.64% of the proposed costs as a result of 8 potential vehicle movements. 1.64% would result in a circa. £100,000 contribution based on the identified scheme cost of £6,913,525 which equates to approximately £12,500 per vehicle. We do not consider that this fairly and reasonably relates in scale and kind to the proposed development.</p> <p>M&M would also expect a full breakdown of the cost estimate for the DEAR to be provided to ensure that all parties are aware what works are included and a review of the rates utilised to reach the £6,913,525 figure quoted in the document.</p>	<p>The scale of the contribution is defined in the table on p7 and is clearly related to the total cost of the project. The figure of 8 movements is per hour, not for a whole day, and therefore the calculation shown per vehicle is not valid. The actual number of trips is based on a proportion of the trips made to Denny High School from the development site, as referred to under response to Section 4 above.</p> <p>Any alteration/reduction to the Dennyloanhead site's share will result in an automatic increase for other sites. The total cost of £6,913,525 shown in the SPG is the most up to date, as estimated by the Council's Engineering Design team and includes a prudent 'optimism bias' allowance i.e. worst case scenario. The Council is happy to share these with Mactaggart and Mickel and any other developer and they will be updated to reflect costs whenever construction takes place.</p>

	Non-specific	Given the uncertainty over delivery of the DEAR M&M consider that the historic position taken by the council requiring the Mydub site to deliver the road should be reinstated which would be in keeping with the developers assurances at the Local Plan Hearing where they confirmed that the Mydub site would deliver the road in its entirety.	The Council has decided, through the FCLP, that a number of sites will contribute to the cost of the road and the SPG cannot change that decision. The Mydub site makes the highest contribution by a considerable margin.
Banknock, Haggs and Longcroft Community Council	Non-specific	BHL Community Council welcome action to progress DEAR, the route of the road seems logical and the use of developer contributions to fund at least part of the road is appropriate.	Support welcomed
	Non-specific	The funding proposal seems unnecessarily complex and perhaps inconsistent, in that it includes contributions from projects in the Banknock/Haggs/Longcroft area whilst there are no contributions from developments in Bonnybridge or elsewhere. Also the inclusion of Denny Town Centre is questioned.	The choice of sites was partly dictated by the requirements of FCLP, which names specific sites, and partly driven by an assessment of sites which would generate additional traffic impacting on Denny Cross, most obviously Denny Town Centre. Other sites which may come forward in the future and would make a significant traffic impact will also be eligible to make a contribution.
	Non-specific	Given that the draft SPG indicates that 85 – 92% of the funding is to come from only two parties it is suggested that the two parties engage with a view to progressing matters in early course	This is likely to be negotiated at the planning application stage.
	Non-specific	On the basis of the information available the total cost of the project (almost £7million) seems high. Competitive tendering would achieve a lower quotation and also that the developer be invited to submit a price for constructing all of the road (to the Council's specification)	The costs have been calculated using accepted engineering design methodology and include a generous 'optimism bias' i.e. worst case scenario. The decision on how, and which parties, will construct the road is yet to be taken.
Bonnybridge Community Council	Non-specific	Bonnybridge community council would like to commend Falkirk Council in getting this plan onto the drawing board	Support welcomed
	Non-specific	DEAR should be built as soon as possible and should be built as one project, rather than piecemeal, which would appear to be the preferred option in the consultative draft	The Council's current position is to delivery DEAR through developer contributions, but it is willing to consider other funding options should circumstances change

	Map 1	Looking at the plan on the back page of the Consultative Draft document there is no mention of cycle paths on this route. This route will obliterate a path from Chasefield Wood to Herbertshire Park. What will be put in its place?	The SPG does not go into design detail and map 1 is primarily illustrative. However the road design as proposed does include a separate cycle path along the whole length of the road and makes provision to maintain the footpath/cycle route links between Chasefield Wood and Denny
	Para 2.1	This paragraph states DEAR has its origins in the 1970s when options to relieve traffic congestion at Denny Cross were first considered. Given the time which has passed all our councillors need to bury their political differences and get together with the planners and find a way to deliver this project. This is for the good of our community and goes beyond political posturing.	The SPG represents the Council's acknowledgement that the problem of congestion has to be tackled and that DEAR is the current preferred solution. Other solutions have already been implemented or considered e.g. Nethermain Road was the scheme developed in the 1970's as a relief to Denny Cross for north-south traffic. In the 1990's a scheme to bypass Stirling Street at the rear of the Co-op store was included in the Council's Transport Policies and Programme (TPP). This scheme was dropped as a result of an extension to the Co-op.
	Section 4	The Mydub project will be the biggest contributor to this site. A rough calculation for the ~ 300 houses proposed for this site is ~ £11,000 per unit. Is this reasonable and will the builders bear this cost? Given that there are other social costs attached to each unit, we wonder if this is deliverable	The share of the cost attributed to the Mydub site is proportionate to the impact of traffic from that site. Mydub's share is large because traffic from that site will make the biggest impact. The Council is willing to be flexible on the timing of payment of contributions in order to ensure deliverability of the project.
Councillor McNally	Non-specific	Discussion with farmers affected by severance brought forth a in view that the best way to avoid more congestion at Denny Cross would be to either front load the complete development of the route by prudential borrowing within the council, as within the report, or build from the Denny High School end of the route to allow the new housing residents to enter from that side thereby hopefully most of the traffic avoiding the Cross.	The Council's current position is to delivery DEAR through developer contributions, but it is willing to consider the front funding option should circumstances change. Para 5.1 of the draft SPG explains the pivotal role of site H.DEN12 in starting the road's construction and therefore building will most likely start at the Glasgow Road end rather than the school end.
	Section 4	The developer funding method of delivering the project is, as is known, flawed through the downturn in the housing market since the recession hit the construction industry particularly hard, and if all indications are correct the people and community of Denny/Dunipace will be waiting at least another 20 years for the housing market to recover, if ever, to pre recession levels.	The Council's current position is to delivery DEAR through developer contributions, but it is willing to consider other funding option should circumstances change.

	Non-specific	On the approach to sharing costs, the Council will be aware of major house builders/developers in the west/ward 3 opting out, asking for dispensation from their commitments, agreed previously with yourselves , the planners on behalf of the council. This cannot be allowed!	Mactaggart and Mickel have requested a variation of the S75 Obligation. This is for the Council's Planning Committee to consider and is outwith the scope of the draft SPG.
Councillor McCabe	Para 1.1	Cllr McCabe holds that it is erroneously stated in this paragraph that the " <i>route will require to be developer funded</i> ." His view is it doesn't have to be.	The wording ' <i>the route will require to be developer funded</i> ' is a direct quote from the adopted Falkirk Council Local Plan (FCLP) which this draft SPG seeks to implement. The SPG cannot change the wording of its parent approved plan. The Council's current position is to delivery DEAR through developer contributions, but it is willing to consider other funding options should circumstances change, as discussed in paras 5.4 to 5.6
	Para 1.3	Falkirk Council Local Plan is the old plan. Why is the Council not using the new Local Development Plan for this new SPG?	This SPG is a specific requirement of Falkirk Council Local Plan which contains provision for DEAR, as stated in the first paragraph of the SPG. FCLP is the current Local Plan and sets out planning policy and proposals on which planning applications are assessed. It will not be superseded by Falkirk Local Development Plan until 2015.
	Para 2.1	This paragraph states..." <i>mid 1990's when a route for a relief road to the east of Denny town centre was safeguarded</i> ." Cllr McCabe holds the view that 20 years of " <i>safeguarding</i> " seems excessive when it appears the Council are still proposing nothing.	The safeguarded route for an eastern town centre bypass referred to in para 2.1 was a different proposal to DEAR and was abandoned in the early 2000s. The current proposal has not been safeguarded for 20 years.
	Paras 3.1-3.5	A number of references are made to considering the cumulative impact of development, apportioning costs based on level of traffic and on the extent to which traffic would impact on Denny Cross and/or the new road. Cllr McCabe asks which impact is being calculated, if the new road hasn't been constructed yet. He also queries who will have the right to revise the pro-rata contributions shown in the draft SPG and when would this take place?	Even though DEAR is not yet constructed it is possible to model traffic usage of such a road from each site. Therefore the impacts which are calculated for each site are based on the projected distribution of traffic using either of Denny Cross and DEAR. Para 3.5 states 'The Council reserves the right to revise the SPG, in particular the pro-rata contributions, to take account of changing circumstances in the development plan framework'. Any proposed changes to the pro-rated contributions will be presented to the appropriate Council committee for agreement. It is anticipated this will first arise when the emerging Local Development Plan is adopted, which will contain different housing allocations from the current Local Plan, which will need to be taken into account in the contribution table.
	Para 3.6	This paragraph makes reference to a contribution having already been agreed. Cllr McCabe believes this is entirely questionable since McTaggart & Mickel have already submitted a variation to the	It is a fact that MacTaggart and Mickel have agreed, through a S75 Obligation, a contribution of £550,000 for DEAR. They have subsequently requested a variation of this planning obligation. It is for the Council, through the Planning Committee, to decide whether to

		planning approval and wish to withdraw. Cllr McCabe asks whether this comment should be removed as it is not based on fact.	consent to this request and is outwith the scope of the draft SPG.
	Para 4.1	Cllr McCabe asks for an explanation of the sentence ' <i>Actual share will only be attributed at the time of a planning application</i> '.	This is normal professional practice in dealing with developer contributions for transport projects. As the paragraph explains in its first sentence the actual costs to be divided up between sites are only relevant at the time of construction. Not all sites have been the subject of a planning application yet. The SPG is a guide, and is not definitive.
	Para 4.5	Cllr McCabe states the Mydub development has indicated a 10 year term of phased construction. He wonders if the Council has to wait 10 years until Bett put up their full contribution; or is there expected to be a pro-rata staged payment timetable?	The timing of payments will be negotiated between Bett and the Council and set out in the relevant S75 Obligation, assuming the current application receives planning consent.
	Para 5.1	Cllr McCabe queries the 'pivotal' role of the Mydub site in how the road construction proceeds and believes their share of the total cost is too excessive a burden for one site.	Mydub's role is pivotal because it is the only site which requires DEAR as a site access. Bett are expected to construct a part of the road themselves so they will start the whole project, which is important. Mydub's share is large because traffic from that site will make the biggest impact. If Mydub's share were to be reduced then, mathematically, the shares attributed to other sites would have to increase to compensate.
	Section 5 generally	Cllr McCabe believes that this section shows that the Council's chosen funding strategy for the road is flawed.	Paragraphs 5.2 to 5.6 are intended to show that the Council has considered other funding options to deliver the project. It shows the Council is willing to keep options open, in recognition of the fragility of the current development market which could constrain the receipt of developer contribution funding.
Non Aligned Independent Group	Paras 1.1, 1.3, 2.1, 3.3, 4.1, 4.5, section 5		The points made by the Non Aligned Independent Group are almost identical to that of Cllr McCabe and therefore the responses to the section above also apply here.