

**EXAMINATION OF THE STROUD DISTRICT LOCAL  
PLAN REVIEW**

**INSPECTORS' MATTERS, ISSUES AND QUESTIONS**

**MATTER 11: Infrastructure Provision and Viability**

**Matter 11a Infrastructure – general questions**

**On behalf of: Robert Hitchins Ltd**

Date: February 2023 | Pegasus Ref: SHF/P17-2258

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## Document Management.

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Pegasus is instructed by Robert Hitchins Ltd to submit a Statement in respect of Matter 11a, pursuant to the Matters and Questions identified by the Examination Inspectors.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1
- Matter 2
- Matter 3
- Matter 6
- Matter 6a
- Matter 6c
- Matter 6d
- Matter 6g
- Matter 7
  - Matter 7a
  - Matter 7b
  - Matter 7c
- Matter 8
- Matter 10
  - Matter 10a
  - Matter 10c
  - Matter 10d
- Matter 11
  - Matter 11a
  - Matter 11b
  - Matter 11c

Following the submission of the Reg 19 representations in July 2021 Pegasus along with PFA Consulting and Pioneer Housing and Development Consultants have also responded to the Stroud District Local Plan Review Additional Technical Evidence in October 2022.

The Hearing Statements should be read alongside our representations and supporting evidence. As instructed, we have not repeated our representations of July 2021 or October 2022; but instead sort to highlight the salient points in response to the MIQs and indicated what changes we consider necessary in order for the Plan to be found sound.



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## 11. MATTER 11 – INFRASTRUCTURE PROVISION AND VIABILITY

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

### Matter 11a Infrastructure – general questions

#### Infrastructure and Developer Contributions – Core Policy CP6

1. **The policy seeks ‘to ensure that infrastructure will be in place at the right time to meet the needs of the District and to support the development strategy.’**
  - a. **The policy identifies the Council’s broad intentions in achieving infrastructure provision, rather than setting out clear development requirements. What infrastructure is actually sought from development proposals or is this appropriately set out within other Plan policies including the site allocations? Can the Council clarify the purpose of the policy and how a decision-maker would use it when determining future proposals?**
    - 1.1 This is for Stroud District Council to answer, however as drafted it would appear to be no more than a statement of intent and therefore not in accordance with paragraph 16d of the Framework. Some infrastructure requirements are set out in Delivery Policy DHC7 but only relates to open space and sports provision.
    - b. **As regards the reference to developer contributions, we are unclear as to exactly what the policy is seeking from development proposals? What contributions are actually sought and are these viable? Can the Council clarify please?**
      - 1.2 This is for Stroud District Council to answer.
    - c. **Overall, is the policy justified, effective and consistent with national policy**
  - 1.3 As set out in detail in our representations to the Regulation 19 consultation, Core Policy CP6 does not set out the contributions expected from development, or the levels and types of infrastructure required, and is therefore not in accordance with paragraph 34 of the Framework. Instead, the Plan defers to the Infrastructure Delivery Plan, which the submission draft Local Plan correctly identifies is not part of the Development Plan.
  - 1.4 In order for the Plan to be deliverable the burden on development (including those stemming from the Adopted Plan) should be thoroughly tested at Examination. It remains unclear if the potential cost of Policies DES3, ES6, ES12 and ES16, as assumed in the Council’s Local Plan Viability Assessment 2022, are robust. We have considerable concerns regarding the calculation of some of the infrastructure costs, and also the costs relating to education provision as set out in detail in our representations to the Regulation 19 consultation and the Additional Technical Evidence limited consultation (October 2022).
  - 1.6 Notwithstanding concerns regarding sales values and costs of development, the evidence from the Council’s viability assessment is that 69% of the non-strategic and 100% of the Strategic Sites tested would be unable to support all of the proposed policy and developer contributions.

**Town & Country Planning Act 1990 (as amended)**  
**Planning and Compulsory Purchase Act 2004**

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