



Examination of the Stroud District Local Plan Review

**MATTER 11: INFRASTRUCTURE PROVISION
AND VIABILITY**

HEARING STATEMENT

Prepared by Blue Fox Planning Ltd on behalf of:

Persimmon Homes Severn Valley

February 2023

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- 1.2 PSHV also control land allocated for development at 'South of Wickwar Road, Kingswood' (PS38) where a planning application for up to 54 dwellings is live and awaiting determination.
- 1.3 Our comments in response to the Matter 6 questions are prepared in the context of PS24 and PS38.

2. Matter 11b: Transport

Matter 11b Transport.

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

- 2.1 Document **EB98** sets out the assessment of highway impact which has been produced to inform mitigation associated with the Local Plan. In addition, subsequent transport mitigation is identified within the **EB109** which recommends contributions from specific allocations, including from PS24 where it identifies highway enhancements on the A38.
- 2.2 The assessment within **EB98** includes for an allowance of 900 dwellings at the Cam North West site in accordance with draft policy PS24. Notwithstanding this, it is noted that the current proposals at this site, as outlined in the associated planning applications dated August 2021 include for a potential housing delivery of up to 1,030 dwellings.
- 2.3 The general traffic generation rates as set out in the **EB98** report are of higher level than are considered to be applied locally, particularly in consideration of a proposed development that prioritises travel by sustainable modes. It should also be noted that the **EB98** document does not outline whether any adjustments have been made to take account of the impacts of Covid 19 on travel patterns which has resulted in more home working that has reduced commuting trips in the long term that would further reduce traffic levels.
- 2.4 Thus, it is considered that the assessment of 900 dwellings at PS24 has been based on robust principles and the extension of development proposals by a further 130 units would not have any further impact above that already forecast and therefore, in line with NPPF paragraph 104, the potential impacts of development on transport networks can be addressed.

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

- 2.5 CP6 provides the policy framework and is supported by the IDP which identifies the infrastructure required to support the development. The approach to funding, based on apportionment of costs and assumptions on housing growth, is reliant upon Stroud housing delivery data and as yet unknown development locations in neighbouring

authorities. This raises genuine concerns as to how effective the Plan and its supporting evidence base, including the IDP, is in ensuring the timely delivery of supporting transport infrastructure.

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

- 2.6 **EB98** Traffic Forecasting Report Addendum include for an allowance 900 dwellings at the Cam North West site in accordance with draft policy PS24. The inclusion of this site is appropriate as a key strategic allocation providing a sustainable extension of Draycott. Notwithstanding this it is noted that the current proposals at this site, as outlined in the associated planning applications dated August 2021 (Planning Reference S.21/1913/OUT and S.21/1875/OUT), include for a potential housing delivery of up to 1,030 dwellings.
- 2.7 An associated masterplan has also been submitted that demonstrates that the site has sufficient capacity to accommodate this level of development whilst providing appropriate levels of density in accordance with the development character of the area. Thus, in order to be in accordance with the current application in relation to this site it is recommended that the assessment be revised to include for up 1,030 units within the Cam North West site.
- 2.8 The EB98 document does not outline whether any adjustments have been made to take account of the impacts of Covid 19 on travel patterns which has resulted in more home working that has reduced commuting trips in the long term. Therefore it is likely to be the case that traffic generation set out within Table 3.1 of the ED98 document, would represent a significant overestimate of traffic levels on a per dwelling basis.
- 2.9 The assessment includes for two mitigation scenarios that are as follows:
- 2040 Local Plan with Preferred Highway Mitigation
 - 2040 Local Plan with Preferred Highway Mitigation and Sustainable Transport Strategy
- 2.10 It is noted that one mitigation scenario that is missing from the assessment would be a scenario that includes the Sustainable Transport Strategy but excludes Preferred Highway Mitigation (i.e. 2040 Local Plan with Sustainable Transport Strategy). The inclusion of this scenario is important on the basis that Sustainable Transport improvements may serve to reduce the requirement for highway infrastructure. This is important to ensure efficient use of land and resource and at the same time ensuring that excess highway capacity is not provided that may serve to encourage greater vehicle use than would otherwise be the case without these highway enhancements.

DELIVERY AND VIABILITY

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

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

2.11 At the point of the additional consultation on the Technical Evidence (October 2022) there was no published Statement or Common Ground or Memorandum of Understanding which would suggest that the approach and assumptions applied are agreed as a sound basis for the apportionment of funding costs/delivery.

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

2.12 It is unclear why the housing growth assumptions in neighbouring authorities are based on Stroud district delivery data and there is no specific analysis as to whether Stroud data is comparable in order to justify the use of this data. Housing delivery data in neighbouring authorities is readily available and through the discussions with neighbouring authorities it is difficult to understand why such data cannot be supplied and used to inform the housing growth assumptions.

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

realistic prospect of this funding coming forward to deliver the infrastructure required?

2.13 The main concern is that the apportionment of costs/funding is reliant upon housing data which is not specific to the authority within which growth assumptions are based. There is not only a reliance on Stroud Data, but also reliance on delivery from sites which are not yet identified in a neighbouring plan. Such circumstances raise genuine concerns that the funding can be achieved and the reliance on undetermined sites / development locations presents unresolved questions about the timing and scale of any funding that will provide development within neighbouring authorities.

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

2.14 There is no reference to any such discussions with neighbouring authorities. Details should be presented by the Council. Their omission would only undermine the credibility of the funding strategies to support the mitigation packages identified. The information from the Council should indicate what actions were agreed for progression.

2.15

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

2.16 The funding and approach to apportionment is based on high level assumptions which are not supported by specific evidence to give confidence that this is a reasonable and effective mechanism to deliver the mitigation packages. As such, this carries significant risk that development locations which are acceptable subject to such the mitigation being secured will be delayed and undermine the reliance on such sites to deliver as envisaged in the Local Plan.

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

2.17 Paragraph 5.15 of the TFDP explains that ‘Sites delivering over 150 dwellings or 5ha of employment have been considered capable of contributing to Mitigation Packages.’ This implies that there has been an assessment which supports the threshold of 150 dwellings. However, this is not presented within the TFDP. This appears to be an arbitrary threshold, not supported by any specific analysis. As such there is concern that sites below this threshold, which could be located in areas where the mitigation

packages would apply, would be exempt from any such contributions, notwithstanding the potential of such sites to add to the cumulative impacts which necessitates the mitigation packages. Table 6 of the TDFP details the impact of small/windfall sites, but only for neighbouring authorities. The reasons for not including figures for the Stroud district are not explained.

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

2.18 The TFPD values are applied to the IDP and associated viability assessment. There is no sensitivity testing, or alternative funding apportionments contained within the TFDP, therefore the wider implications of a change in the allocation of funding to specific sites is not known.

3. Matter 11C: Other Infrastructure

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

- 3.1 The allocation of costs in Appendix A of the IDP requires further explanation in terms of the specific infrastructure items associated with individual sites. Appendix A states 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. Any allocation of transport costs must be directly related to the proposals and proportionate in terms of the schemes impact. The fact that no apportionment analysis has taken place contradict the different levels of financial contribution outline in Appendix between sites for the same infrastructure.

Q30. Provision of new open space – Delivery Policy DHC7

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

- 3.2 DCH7 confirms that provision will be ‘proportionate’ to the scale of development and recognises that not all provision will be appropriate or feasible on site. In which case off-site contributions can be applied. DCH7 lists the different typologies and quantity and access standards which provides a framework for securing provision.

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

- 3.3 As set out in the IDP, it is understood that allocations within this Local Plan will be subject to the Community Infrastructure Levy. As such, DCH7 needs to provide a clear framework to explain how off-site contributions will be secured and what falls under CIL or site specific planning obligations.
- 3.4 For example, it is noted that Council’s Infrastructure Funding Statement (December 2022) that the installation of a 3G AstroTurf Pitch at Archway School was funded through CIL. Improvements to Stratford Park Outdoor Pool has also been funded through CIL.
- 3.5 There is concern that the lack of specific detail presents significant challenges in terms of funding delivery through planning obligations and CIL, with the potential for duplication and resultant confusion.

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

- 3.6 Where provision is sought via a planning obligations, this must be restricted to provision which accords with the statutory tests. This should be clearly referenced in the policy wording.



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