

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

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

**MATTER 11:
Infrastructure Provision and Viability**

On Behalf of: Redrow Homes

February 2023



Introduction

CarneySweeney has been instructed by Redrow Homes to submit a Hearing Statement in respect of Matter 11 pursuant to the Issues, Matters and Questions identified by the Local Plan Examination Inspectors in respect of Stroud District Council's Local Plan Review.

This Hearing Statement should be read alongside the representations we have previously made to the Local Plan and in particular, the representations made to the Regulation 19 Consultation (July 2021) and Technical Evidence Consultation (October 2022).



Matter 11 Infrastructure Provision and Viability

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

Matter 11a Infrastructure – general questions

Infrastructure and Developer Contributions – Core Policy CP6

1. ***The policy seeks ‘to ensure that infrastructure will be in place at the right time to meet the needs of the District and to support the development strategy.’***
 - a. ***The policy identifies the Council’s broad intentions in achieving infrastructure provision, rather than setting out clear development requirements. What infrastructure is actually sought from development proposals or is this appropriately set out within other Plan policies including the site allocations? Can the Council clarify the purpose of the policy and how a decision-maker would use it when determining future proposals?***

For the Council to clarify but Redrow Homes has concerns that Core Policy CP6 provides no indication of the infrastructure requirements for the strategic sites and consequently it is not clear what the policy requirements are so that this can be taken into account in assessing the viability of the sites. Furthermore, the mechanisms to deliver the strategic infrastructure (whether this be through CIL, S106, neighbouring LPA’s or other funding sources) should be clarified and explicitly set out in the Local Plan so as not to cause any unnecessary delays to the delivery trajectory or phasing of the strategic sites.

Concerns are also raised by the working of supporting paragraph 2.9.30 of the Policy CP6 which suggests that the Infrastructure Delivery Plan (which it is noted “*accompanies but is not part of the Local Plan*”) will be reviewed and updated as circumstances change. This infers that the levels of infrastructure identified by the IDP and presumably sought by the emerging Local Plan could change without these being subject to examination, relevant policies reviewed accordingly. Such changes could lead to the deliverability of the emerging Local Plan being undermined contrary to paragraph 34 of the NPPF.

The PPG Plan Making Paragraph 060 Reference ID: 61-060-20190315 states: “*Annual reviews of the infrastructure funding statement should feed back into review of plans to ensure that plans remain deliverable. Should issues arise which would adversely affect the delivery of the adopted strategy then the authority should consider alternative strategies, through a plan review, if*



these issues are unlikely to be resolved.”

- 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?***

As per Question 11a.

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

As per Question 11a - we would re-iterate our concerns that the infrastructure policy requirements outlined in Policy CP6 are not clear contrary to PPG Planning Obligations Paragraph: 004 Reference ID: 23b-004-20190901. Furthermore, the Stroud Local Plan does not set out the contributions expected from development for infrastructure to support the delivery of the strategic sites contrary to PPG Planning Obligations Paragraph: 005 Reference ID: 23b-005-20190315.

Matter 11b Transport

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

Definition and scope of transport infrastructure required

- 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?***

No comment at this stage – for the Council to respond.

- 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?***

As set out in our previous representations (in particular to EB98), the updated traffic modelling reflecting the revised allocations has not accounted for the additional interventions set out in the STS Addendum; the further reductions in traffic from the additional Sustainable Transport Strategy (STS) intervention



measures now proposed are not realised in the model results. If these were included the level of highway mitigation may be reduced. More detail of the more major mitigation schemes, notably at M5 J12 & J14 is required as the delivery of these will be key in delivering Local Plan growth. The updated modelling has shown that the additional development at Javelin Park will put further pressure on the operation of the highway network at M5 J12 for which further mitigation is likely. The required highways mitigation works at M5 J12 and the M5 as a whole represent a strategic network issue and cannot be solely the responsibility of Stroud District Council or its Local Plan's Strategic allocations to 'fix'.

There is uncertainty over the overall cost of improvement works, errors in the apportionment of impacts and an expectation that significant proportions of the funding of the mitigation packages will come from neighbouring authorities (our comments on EB109). There are inconsistencies with regard to the transport infrastructure and focus for funding identified in respect of G1 South of Hardwicke and other sites when comparing the various technical evidence documents (our comments on EB110).

The mechanisms to deliver the strategic infrastructure (whether this be through CIL, S106, neighbouring LPA's or other funding sources) should be clarified and explicitly set out in the Local Plan and IDP so as not to cause any unnecessary delays to the delivery trajectory or phasing of the strategic sites (our comments on EB98).

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

The traffic modelling suggests that the proposed mitigation would be sufficient to mitigate the traffic impacts of the Local Plan growth; however, there are concerns with the uncertainty of costs, errors in the apportionment of impacts and inconsistencies with regard to the transport infrastructure and focus of funding as set out above in our comments to Matter 11b 3.

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?*

The traffic modelling and mitigation relies on key transport infrastructure being delivered in a timely manner. The mechanisms to deliver the strategic infrastructure should be clarified and explicitly set out in the Local Plan and IDP as set out above in our comments to Matter 11b 3.

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



No comment at this stage – for the Council to respond.

Demand management and sustainable travel measures – Core Policy CP13

- 7. Core Policy CP13 seeks to support major development subject to three transport related criteria. It also provides a further 4 criteria to be met by all development schemes. The policy also expects proposals to ‘consider all possible sustainable transport options’ before increasing the capacity of the road network and to be consistent with and contribute to the implementation of the agreed transport strategy.**
- a. Is the policy consistent with national policy which includes seeking to minimise the need to travel and promoting sustainable transport modes?**
 - b. Does the policy set out clear requirements for sustainable transport provision? What is meant by the term ‘consider all possible sustainable transport options’? What are developers meant to do after they have considered such options?**
 - c. Does the policy recognise that opportunities to maximise sustainable transport solutions may vary between urban and rural areas as recognised in paragraphs 85 and 105 of the Framework? How does this apply to Stroud District?**
 - d. Are the criteria justified and effective? Is it clear how a decision-maker should determine future proposals against each of the relevant criteria?**
 - e. Is the reference to ‘having regard to ... the Council’s adopted (parking) standards’ appropriate? Are these the standards set out in Appendix C? Is the policy clear on this and are the standards justified?**
 - f. Is the requirement to be consistent with the transport strategy justified?**
 - g. How does this policy relate to Delivery Policy EI12? Are the policies consistent? Is there unnecessary or confusing duplication between these policies?**

G1 South of Hardwicke is located where a sustainable pattern of development can be achieved by way of access to local facilities including education, leisure, health, retail and employment on foot, by bicycle or by bus. The site is adjacent to the A38, which is identified as a ‘Main Movement Corridor’ in the Stroud Sustainable Transport Strategy where integrated packages of initiatives can be delivered, which can showcase multimodal use with a focus on sustainable travel modes. Improvements to the A38 will provide additional benefits to the economy and new developments off the road.



Promoting transport choice and accessibility – Delivery Policy EI12

8. ***The policy seeks to promote transport choice and accessibility.***
- a. ***The policy requires parking standards and principles for development to be provided to the adopted standards in Appendix C. Is this requirement consistent with Core Policy CP13 which only requires regard to be had to the standards? Is the policy clear and are the standards justified and consistent with national policy?***
 - b. ***How does this policy relate to Core Policy CP13? Are the policies consistent? Is there unnecessary or confusing duplication between these policies?***

No comment at this stage – for the Council to respond.

District-wide mode-specific strategies – Delivery Policy DEI1

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

No comment at this stage – for the Council to respond.

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

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

No comment at this stage – for the Council to respond.

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

No comment at this stage – for the Council to respond.

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

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

No comment at this stage – for the Council to respond.



Protection of freight facilities at Sharpness Docks - Delivery Policy EI15**13. Is the policy justified, effective and consistent with national policy?**

No comment at this stage – for the Council to respond.

Provision of public transport facilities - Delivery Policy EI16**14. Is the policy justified, effective and consistent with national policy?**

No comment at this stage – for the Council to respond.

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

Our previous representations (in particular to EB109) have highlighted concerns about the costs of a number of the transport schemes which form part of the mitigation to deliver the Local Plan growth as set out above in our comments to Matter 11b 3.

16. The Transport Funding and Delivery Plan (July 2022) (TFDP) identifies three transport mitigation packages. These are:***M5 Junction 12:***

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

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

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

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



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

Given the importance of these three transport mitigation packages to deliver the Local Plan growth, it is considered essential that more informed costings are provided, as this will determine their affordability in delivering the proposed development.

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

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

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

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

The updated modelling (see our response to EB98) has shown that the additional development at Javelin Park will put further pressure on the operation of the highway network at M5 J12 for which further mitigation is likely. With regard to the new Park & Ride, as set out in our previous representations (in particular to EB108 and EB109), additional interventions have been identified, which include a strategic Park & Ride and interchange hub at M5 J12 although it is not a scheme in the IDP Addendum and no location has been identified and this needs to be addressed. Clearly the G1 South of Hardwicke site would not be an appropriate location given that it is Gloucester side of the Cross Keys Roundabout, which is a pinch-point for traffic, and a strategic interchange would take up a substantial area of land thus reducing the number of dwellings that could be delivered on the site. The mention of a new Park & Ride site at M5 J12, which has not been included in the Transport Funding and Delivery Plan, is vague and needs to be firmed up to ensure an appropriate location and funding is identified if it is to form part of the County Council's interchange strategy.

18. The TFDP sets out indicative costs for the three schemes (page 5). For the M5 J12 scheme this is £9,437,500; the M5 J14 scheme is £27,246,837; and the A38 package is £3,812,500. Are these indicative costs realistic and do they provide a reasonable basis upon which to consider the viability of delivering the growth set out in the Plan?



Our previous representations (in particular to EB109) have highlighted concerns about the costs of these transport schemes which form part of the mitigation to deliver the Local Plan growth as set out above in our comments to Matter 11b 3.

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

No comment at this stage – for the Council to respond.

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)?***
- 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?***
- 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?***
- 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?

- e. How would the global figure assigned to neighbouring authorities be broken down at the individual district level?***
- 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?***
- g. Are any of the schemes identified reliant on land in third party ownership for their delivery? If so have discussions with relevant land owners taken place? If necessary, have realistic acquisition costs been included when calculating likely scheme costs?***
- h. The TFDP distributes the growth apportioned for Stroud District to 12 site allocations. Is the scale and distribution of costs reasonable? Is there agreement that the costs set out are reasonably accurate? Have viability considerations been appropriately considered?***
- 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?***
- 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?***
- k. Equally, if agreement cannot be reached would failure to deliver the infrastructure schemes during the plan period affect delivery assumptions for these allocations?***
- l. Are any allocations or development reliant on the delivery of any of these schemes at a particular point during the plan period? For example we note comments from National Highways that improvements to Junctions 12, 13 and 14 of the M5 are likely to be required early in the plan period. If so, is a lack of identified funding likely to affect delivery assumptions in the Plan?***

As set out in our previous representations in respect of EB109, it is crucial that a scheme and accurate cost estimate for M5 J12 is established together with realistic apportionment of funds to determine any shortfall such that sources of funding can be secured to provide certainty and the timely delivery of the Local Plan. There is uncertainty over the overall cost of M5 J12 improvement works, errors in the apportionment of impacts and an expectation that significant proportions of the funding of the mitigation packages will come from



neighbouring authorities. This has not been discussed with the JCS authorities as far as we are aware and there is no timescale or certainty and limited information on the locations or timing of housing growth outside of the Stroud District.

- 21. *The Sustainable Transport Strategy (STS) Addendum (July 2022) lists 14 interventions to be included in the STS Addendum (Table 2.2). The schemes include a number of significant infrastructure projects that are referred to in the Plan including public transport for a strategic park and interchange hub scheme for M5 J12 and a new railway station (s) south of Gloucester, north of Bristol. Under funding status, all the interventions state 'still required'.***
- a. Has any funding been identified to support the delivery of these interventions?***
 - b. Reference is made to a Strategic Outline Business Case (SOBC) being produced for a potential rail station at Stonehouse which will test options and deliverability. What are the timescales for this piece of work and when is it expected to be completed? If the SOBC concludes that a new station would not be viable would there be any implications for the Plan?***
 - c. Are any allocations or development reliant on the delivery of any of these schemes at a particular point during the plan period? If so, is a lack of identified funding likely to affect delivery assumptions in the Plan?***
 - d. Are these interventions expected to be delivered during the plan period and if so how will they be funded?***

As set out above in our comments to Matter 11b 20, the mention of a new Park & Ride site at M5 J12, which has not been included in the Transport Funding and Delivery Plan, is vague and needs to be firmed up to ensure an appropriate location and funding is identified if it is to form part of the County Council's interchange strategy.

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

No comment.

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



- a. ***Are these proposals necessary and justified by the evidence?***
- b. ***Has the effect of these requirements on the viability of the relevant allocations and policies been considered and if so what does the evidence show?***
- c. ***In order to ensure that the Plan is effective should the updates be incorporated into the text for the relevant allocations/policies in the Plan?***

As set out in our previous representations in respect of EB108, the STS Addendum sets out updates to site proposals which, in respect of G1 South of Hardwicke, includes the provision of cycling and walking routes connecting to Quedgeley West. The development could construct routes up to the boundary with the Quedgeley West site, but works to form any connection to Quedgeley West itself would have to be with the agreement of the owner of the site, which cannot be guaranteed, and this should be reflected in any revised policy wording. Access to Quedgeley West by active travel would be achievable via the A38.

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

- a. ***How was the extent of the reduction in the number of trips decided? Are the values evidence based?***
- b. ***Given that there is some uncertainty over the funding status of many of the sustainable transport schemes listed in the STS Addendum was it reasonable to take account of these considerations?***
- c. ***If the sustainable transport interventions cannot be delivered in the right place and at the right time to support the allocations, what effect, if any, would this have on the updated modelling assumptions in terms of impact on the highway network?***

It is our understanding that the SATURN traffic modelling has not been updated to include the changes to the assessment framework summarised in Table 5.1 of the STS Addendum.



Matter 11c Other infrastructure

No Comments

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?*

Wellbeing and healthy communities – Delivery Policy DHC5

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

Green Infrastructure – Delivery Policy DES2

27. *Taking account of recreational pressure at existing GI sites, should the policy be more specific about the identification and delivery of new GI projects along with other mitigation measures and how these will be delivered and funded?*
28. *Is the policy sufficiently flexibly worded to take account of individual development site circumstances / constraints and how that might affect the feasibility / viability of delivering GI?*

Protection of existing open spaces - Delivery Policy DHC6

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

Provision of new open space - Delivery Policy DHC7

30. *Delivery Policy DHC7 requires new residential development to provide open space and sports facilities in accordance with specific standards set out in the policy. The supporting text states that these standards are based on the Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) (EB41 and EB41a-j).*
- a. *Are the standards justified and is the approach effective and consistent with national policy? Are the open space typologies clearly distinguishable or do some overlap?*
- b. *How will a developer or decision-maker determine what provision needs to be made for each future proposal?*



- c. Are the delivery mechanisms justified and effective? Is it clear how any off-site contributions will be sought?*
- d. How does the application of the final sentence in the policy accord with the statutory tests for planning obligations?*

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

- 31. The policy permits new facilities or improvements to existing facilities subject to 7 criteria.**
 - a. How would a decision-maker determine whether disabled access and bus, cycle and walking links were 'adequate' (criteria 3 and 5). What are the benchmarks?*
 - b. Criterion 4 requires on-site cycle/vehicle parking to be provided to the adopted standards. Are these the standards set out in Appendix C? Is this requirement consistent with Core Policy CP13 which only requires regard to be had to the standards? Is the policy clear and are the standards justified?*
 - c. Overall, is the policy justified, effective and consistent with national policy?*

