

Eden District Council EIP Issues and Questions Response on behalf of Story Homes

**Statement I
Policy Dev4 –Infrastructure and Implementation
is this Policy Guidance Justified, Effective and
Consistent with National Policy and Guidance?**

- 1.0 Does the plan need to identify infrastructure requirements, particularly where these will need to be funded by developers?**
- 1.1 Yes, we consider that the plan should identify infrastructure requirements, to help inform developers. However, we consider that this should be supported by a robust evidence base. As the Council are currently producing a “Whole Plan Viability Assessment (EB033)”, the Council’s evidence base in relation to this matter is not therefore complete. We therefore reserve the right to make comments on this document until it is published by the Council.
- 1.2 Clarity is also required as to what is meant by the “scale and pace of new development”. This is ambiguous, and further clarification is required before a full response can be provided.
- 2.0 Should the requirement for planning obligations be set out in the plan?**
- 2.1 We consider that the level of contribution and details of when this will be required should be provided at the outset. As the Council are currently producing a “Whole Plan Viability Assessment (EB033)”, the Council’s evidence base in relation to this matter is not therefore complete. We therefore reserve the right to make comments on this document until it is published by the Council. In its current form, the policy is unjustified.
- 2.2 This is on the basis that Core Planning Principles in Paragraph 17 of the NPPF outlines that Plans “should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency”.
- 3.0 In the context of the proposed Development Strategy, the likely requirement for developer contributions to fund off-site infrastructure and the introduction of limits to pooled infrastructure contributions, is the decision not to introduce a Community Infrastructure Levy justified?**
- 3.1 The Council has not discounted at this stage the introduction of a Community Infrastructure Levy, rather they plan to continue to pursue developer contributions at the time being. We consider the approach adopted by the Council to provide for too much uncertainty and ambiguity. Further clarification is required on the Council’s approach and the relationship between planning obligations and Community Infrastructure Levy.

Summary

Is this Policy Guidance Justified, Effective and Consistent with National Policy and Guidance?

In its current form we do not consider this policy to be sound, as it is not justified. Further clarification is required from the Council into their approaches, to enable this policy to be found sound.

As the Council are currently producing a “Whole Plan Viability Assessment (EB033)”, we consider the evidence support the Local Plan on this matter to be incomplete. We therefore do not wish to comment any further on this policy until the full evidence base is made available to the examination by the Council. We request the Inspector to allow for a period for comments to be submitted in response to this document, once it has been issued by the Council.