

**BLACKPOOL LOCAL PLAN**

**PART 1: CORE STRATEGY**

**BLACKPOOL COUNCIL STATEMENT**

**MATTER 9**

**IMPLEMENTATION, MONITORING AND VIABILITY**

**APRIL 2015**

**Blackpool Council**

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## **Matter 9 – Implementation, Monitoring and Viability** **(All policies and Appendix C: Monitoring and Implementation Plan)**

*Participants: Blackpool BC*

### **Introduction**

This Statement has been produced by Blackpool Council to outline its response to the Matters and Questions raised by the Inspector for the Hearings into the Blackpool Local Plan Part 1: Core Strategy Development Plan Document (SD001).

The Statements form the main basis for the Council's submission to the Hearings. Where appropriate the Statements draw upon and cross reference to the main sources of information used in the preparation of the Core Strategy. To assist document numbers are referenced where appropriate.

### **Position of the Council regarding Matter 9**

#### **9.1 Does policy CS11 adequately cover local infrastructure provision or is modification of the policy (or an additional policy) necessary to the soundness of the plan?**

- 9.1.1 Policy CS11: Planning Obligations sets out the requirements for developers to enter a legal undertaking or agreement to meet the additional needs arising from the development including infrastructure provision. Planning contributions will be sought to ensure that the particular facilities required for a proposed development including the provision of necessary infrastructure, services and community facilities are met.
- 9.1.2 Paragraph 5.161 of the supporting text highlights that the Council works with other infrastructure providers, including the Highways Agency, United Utilities and the Environment Agency, to develop an understanding of existing infrastructure provision and future requirements as well as funding sources and responsibility for delivery. The most up-to-date position is reflected in the Infrastructure and Delivery Plan (SD009) which accompanies the Core Strategy. In addition, the Council works with neighbouring authorities to take account of the need for/support the delivery of sub-regional infrastructure, particularly in relation to developments close to the Blackpool boundary.
- 9.1.3 The supporting text, as modified, recognises that infrastructure is key to the delivery of sustainable development, economic growth and the development needs of the Borough.

9.1.4 The policy appropriately delivers the provision of infrastructure through the means discussed above. Therefore, a modification of this policy or additional policy is not necessary to make the plan sound.

**9.2 Has the likely cumulative impact of the plan’s policies and standards, together with other local and nationally required standards, been adequately considered using appropriate available evidence? Does this indicate that the plan’s policies and standards would not put implementation of the plan at serious risk and would facilitate development throughout the economic cycle?**

9.2.1 The Council considers that the likely cumulative impact of the plan’s policies and standards, together with other local and nationally required standards, has been adequately considered using appropriate available evidence. The Council also considers that the evidence indicates that the plan’s policies and standards would not put implementation of the plan at serious risk and would facilitate development throughout the economic cycle.

9.2.2 To ensure that the sites and scale of development identified in the Core Strategy is viable and deliverable, the Council commissioned URS Infrastructure and Environment UK Ltd and HDH Planning and Development to undertake a viability study of the Core Strategy (EB002) including the impact of saved Local Plan policies (AD007) and requirements set out in adopted SPDs (AD002).

9.2.3 The consultants were appointed to advise in two regards – firstly to ensure that the level of affordable housing and other policy requirements imposed on developers does not generally render development unviable, as required by paragraph 173 of the NPPF. This included advice as to the financial contribution to be required from developers where affordable housing is not provided on site; and secondly to assess the effect of the introduction of Community Infrastructure Levy (CIL) may have on development viability particularly in the context of CIL Regulation 14.

9.2.4 The study specifically examined the development viability of the site types that are most likely to come forward over the plan period based on the Strategic Housing Land Availability Assessment and sites in the Revised Preferred Option Core Strategy. Through the preparation of the study, engagement and consultation took place with land owners, developers and agents. Through the consultation process there was agreement that the most appropriate methodology to adopt in the assessment was that set out in the Harman Guidance which is supported by several sources of guidance and appeal decisions.

9.2.5 The methodology involved preparing financial development appraisals for a representative range of sites and using this to assess whether sites are viable. The assumptions that underpin the appraisals are set out in Chapter 7 of the viability study (EB002) and include in base appraisals taking into account mandatory

requirements regarding the Code for Sustainable Homes (2014) (Part L Building Regulations 2013 changes). Chapter 8 of the viability study sets out the policy requirements that have been appraised and the approach adopted.

9.2.6 The NPPF is clear that the assessment should be based on existing available evidence. The consultants reviewed the evidence available from the Council which falls into three broad categories – firstly evidence that had been prepared by the Council itself to inform the Local Plan including a 2009 affordable housing viability assessment undertaken by Keppie Massie; secondly evidence in the form of development scheme appraisals that had been submitted by developers in connection with specific developments – most often to support negotiations around the provision of affordable housing or S106 contributions; and thirdly records of past planning consents with details of the affordable housing included in projects and the contributions made under the S106 regime – practical and real evidence of what has been delivered historically.

9.2.7 Overall the viability study concludes that the cumulative impact of the proposed policy framework does not threaten or put the Local Plan as a whole at risk. However to facilitate development, particularly the regeneration of the Inner Area, the study identified a number of policy amendments to improve the viability of some site typologies including giving consideration in respect of the Inner Area to lifting those policies including affordable housing, which increase the cost of the development over and above national standards; and caution against moving beyond minimum national environmental standards across the whole of the Borough, recommending only adopting the minimum standard of building regulations.

9.2.8 The recommendations of the study largely related to two aspects of the Core Strategy environmental policy requirements and affordable housing requirements and in preparing the Proposed Submission document the recommendations relating to impact on viability were taken on board and are reflected in Policy CS10: Sustainable Design and Renewable and Low Carbon Energy and CS13: Affordable Housing.

**9.3 Does Appendix C (The Monitoring and Implementation Plan) provide a sound basis for monitoring implementation of the Core Strategy and for taking appropriate action if implementation is not on track?**

9.3.1 The Council considers that the Monitoring and Implementation Plan provides a sound basis for monitoring implementation of the Core Strategy and taking appropriate action if implementation is not on track.

9.3.2 The Core Strategy Monitoring and Implementation Plan at Appendix C of the Core Strategy (SD001) sets out how the Council is intending to measure the effectiveness

of the Core Strategy in meeting its spatial vision, goals and objectives and that it can deliver the intended outcomes.

- 9.3.3 The Monitoring and Implementation Plan sets out key indicators, targets or intended policy outcomes, potential risks to delivery, contingencies to address changes or shortfalls, and also identifies the implementation and delivery mechanisms and partners that will help to achieve the Core Strategy Spatial Vision to 2027.
- 9.3.4 It is important that the effectiveness of the Core Strategy can be monitored to establish if the policies contained within it are achieving the intended spatial vision, goals and objectives. The performance and effects of the Local Plan policies will be monitored and reported on annually as part of an Authority Monitoring Report.
- 9.3.5 For each policy a number of potential risks and contingencies have also been identified to demonstrate how the Core Strategy can deal robustly with changing circumstances. Where necessary, the Authority Monitoring Report may identify any actions or contingencies that need to be taken to address issues identified as part of the monitoring process in order to improve the implementation and delivery of the Core Strategy. It may be the case that the process of monitoring may highlight the need for a timely partial or full review of the Core Strategy.