

Matter 6 – the Council’s Response to the Inspector’s Questions

Monitoring and Implementation

What evidence indicates that necessary infrastructure can be delivered in a timely fashion? Will the arrangements for monitoring the implementation of the Plan be effective? What consideration has been given to contingency arrangements?

Infrastructure

1. Are issues of development viability recognised adequately?

- 1.1. In preparing the DPD, the Council has been fully mindful of paragraphs 173-177 in the NPPF which considers the issues of viability and deliverability. In this context the Council considers that the DPD is indeed deliverable and that there is a reasonable prospect that planned infrastructure will be deliverable in a timely fashion.
- 1.2. Central Lancashire Core Strategy in Chapter 6 looks at the delivery of the essential pieces of infrastructure that will be needed to help deliver development and particularly requirements relevant to the strategic sites and locations. Policy 2 Infrastructure, makes reference in paragraph 3 to development making an appropriate and reasonable contribution to the costs of provision after taking account of economic viability. This policy forms the foundation to Policy A1 in the Site Allocations DPD. The Inspector in his report considered that the provisions made in the Core Strategy for infrastructure were justified, effective and complied with national policy.
- 1.3. The wording of Policy A1 is flexible enough to cover both the current reliance on Section 106 agreements and payments further to the Community Infrastructure Levy (CIL) once the Council’s CIL Charging Schedule has been adopted. Consideration for development viability is inherent within the CIL Regulations. The Council’s response to Matter 5 Question 1 gives more information about CIL, its formulation and progress. Furthermore, the tests which would be applied to any Section 106 agreements are stringent enough to ensure that contributions would only be sought in circumstances where the proposed development would result in such an impact that without which such contributions the development could not be considered acceptable in principle.

- 1.4. The requirements of Core Strategy Policy 2, Policy A1 of the Site Allocations DPD and the regulations attached to both CIL and Section 106 Agreements ensure that development viability will not be compromised and demonstrate that the requirements are both justified and consistent with national planning policy in respect of viability.
- 1.5. In line with the Statement of Common ground with Lancashire County Council, a number of modifications are proposed to the DPD in order to reference the draft Central Lancashire Highway and Transport Masterplan. This document outlines the highway and transport infrastructure required to support the proposals of the Central Lancashire Core Strategy and the Site Allocations DPD. It also identifies the phasing of these schemes and the likely funding sources.
- 1.6. A number of the proposed major infrastructure projects will require funding from a number of sources, both public funds and developer contributions through either S.106 or CIL. Clearly contributions will need to be secured having regard to scheme viability.
- 1.7. An Infrastructure Delivery Schedule (IDS) has been prepared to support CIL and to ensure the delivery of new infrastructure and infrastructure improvements so that development does not place an unacceptable strain upon existing infrastructure and communities. The IDS has been updated in light of the infrastructure proposals outlined in the draft Central Lancashire Highway and Transport Masterplan (Draft Reg 123 Statement – Doc Ref CD5.6.2). The Infrastructure Delivery Plan (IDP) sits alongside and informs the Local Plan. It identifies what infrastructure will be required when it should be delivered, the anticipated costs, and potential funding sources. The IDS will be regularly monitored and kept up to date.
- 1.8. In light of the above the Council considers that viability issues are adequately addressed in the DPD in line with Core Strategy Policy 2 and the NPPF.

2. Is there sufficient clarity regarding how, when and where necessary infrastructure will be provided (and by whom)?

- 2.1. At the time of the Examination in to the Central Lancashire Core Strategy, the County Council as Highways Authority raised no objection in principle to the Core Strategy proposals, but stated that there must come a point where additional traffic can no longer be accommodated without unacceptable impacts or the need for much wider strategic infrastructure improvements to support further development. To this end the County Council stated it would be

appropriate to produce a Highways and Transport Master Plan as a prerequisite to informing the production of detailed proposals for additional infrastructure to come forward, particularly at the Strategic Locations. The Inspector acknowledged that this was a sensible approach.

- 2.2. This document was published at the end of 2012 (Core Document Ref CD4.3) and was the subject of consultation in Jan /Feb 2013. The Site Allocations DPD, in line with the Statement of Common Ground with Lancashire County Council, has been updated, to give greater clarity to the infrastructure required to facilitate the development proposed in the Borough to 2026.
- 2.3. In terms of the Major Sites for Development outlined in Chapter C of the DPD, it has already been explained in Matter Two what infrastructure is required to facilitate these proposals. Each of these major sites will be required to come forward in line with agreed masterplans. The masterplans will address in detail the infrastructure requirements, their phasing, and funding and include an agreed programme of implementation. They will also demonstrate how the individual sites can contribute to providing the highway infrastructure outlined in the Central Lancashire Highway and Transport Masterplan.
- 2.4. Masterplan preparation is more advanced in relation to Pickering's Farm (Policy C1) and Land between Heatherleigh and Moss Lane, Farington (Policy C3) and Development Statements in relation to both of these sites have been submitted to the Examination for information.

Monitoring

3. Does the Plan deal adequately with uncertainty? Is sufficient consideration given to monitoring and triggers for review? How have risks and contingency been robustly addressed in the production of the Plan? Where is the supporting evidence?

- 3.1. Yes, the Plan adequately deals with uncertainty. For example, delivery of sufficient housing to meet requirements cannot be guaranteed throughout the plan period to 2026. To deal with this uncertainty and to ensure adequate flexibility a Performance Monitoring Framework has been developed which identifies a series of contingency options. The performance monitoring framework contains triggers for contingency actions to be put in place, to mitigate against uncertainty and includes corrective action to be taken if and when required. Should the housing delivering fall short of the trigger, Policy D2 of the DPD allows for a review of the phasing of individual sites to help bring forward uncommitted developments and closer management of delivery with key partners may be pursued. However

care must at all times be exercised to ensure such adjustments do not adversely affect housing markets by exacerbating affordability problems. If these fail to remedy the situation, the council would consider reviewing policies with the aim of bringing forward additional/alternative sites for housing development.

- 3.2. Yes, sufficient consideration is given to monitoring and triggers for review. The performance monitoring framework contains triggers for contingency actions to be put in place, to mitigate against uncertainty and includes corrective action to be taken if and when required as detailed in the previous paragraph.
- 3.3. The risks and contingency actions have been robustly addressed in the production of the Plan by ensuring that the policies within the Plan are flexible enough to enable changes to be made in the event of a need to review the Plan before the end of its anticipated life. For example, there is flexibility within Policy D2 to change the housing phasing, Policy G7 is flexible in its requirements to provide/protect green infrastructure, and safeguarded land could be considered for use if a need is identified for additional sites. In addition, the adopted Central Lancashire Core Strategy is flexible in Policy 10 employment sites, allowing the re-use of sites for other uses in certain circumstances. Policy 7 of the Core Strategy offers flexibility in the provision of affordable housing depending on the location of a proposed site.
- 3.4. In addition to the South Ribble Site Allocations DPD Performance Management Framework, the adopted Central Lancashire Core Strategy contains a Performance Monitoring Framework at Appendix D of that document, which includes contingency actions, to ensure all three Central Lancashire authorities monitor progress of that Plan. For example, indicator 4 monitors the net additional dwellings completed in Central Lancashire and identifies contingency actions to be taken should the results hit the trigger of a 20% shortfall on a rolling three year average. It is appropriate to monitor the performance of house building rates over rolling three year periods as it is normal for construction activity to fluctuate from one year to the next.
- 3.5. The South Ribble Site Allocations DPD Sustainability Appraisal (evidence document SRSD005) identifies sustainability issues and addresses inconsistencies and constraints to give further confidence in the Plan. Key issues and problems are identified in Appendix 3 of Part 1 of this document and these have been taken into consideration in the preparation of the Plan.

4. Does the comprehensive list of policies in Appendix 1 need amending in light of the NPPF?

4.1. The list was revised in light of the NPPF and submitted as document reference SRSD007b – Site Allocations DPD – Minor Changes to Appendix 1. The changes in this are identified as follows:

- Deletions have been struck out – these take account of the revocation of the PPGs and PPSs on the introduction of the NPPF.
- Additions to this document have been underlined.

5. Are the arrangements for managing and monitoring the delivery of the Plan clear and will they be effective? Are the targets and monitoring proposed related adequately to the Policy objectives?

5.1. To assess the effectiveness of the Local Development Framework policies, the council is required to produce Annual Monitoring Reports (AMR). Their purpose is twofold:

- to monitor the implementation of the local development scheme (LDS) and
- to assess whether the policies in the local development documents are being successfully implemented.

5.2. The AMR will contain information on the indicators set out in the Performance Monitoring Framework, the first of which will relate to 2012/13 (baseline year) and will be due for publication by the end of 2013. Identified delivery problems may benefit from the introduction of additional, more specific measures, as information becomes available. The authority will review the process as it develops.

5.3. The targets/monitoring periods have been selected to monitor the policies contained within the Plan, and to complement/link to the performance monitoring framework of the Central Lancashire Core Strategy. Appendix B of the Performance Monitoring Framework details the Central Lancashire Core Strategy objectives supported by each policy.

6. How will the effectiveness of the Plan and its individual policies be measured/assessed? What are the monitoring indicators for each policy; do these relate to the policy content and objectives?

6.1. Success of the Plan will be measured through the Performance Monitoring Framework which contains performance indicators for each policy.

- 6.2. Targets have been set for each indicator, together with a trigger for review and contingency actions.
- 6.3. Appendix B of the Performance Monitoring Framework identifies the indicators for each policy and shows which Core Strategy objectives each policy supports.
- 6.4. Any performance indicators not being meeting their target will be identified and contingency actions put in place if trigger levels are reached.

7. Should the Plan include clearer timescales to assist monitoring, thereby providing milestones to assess policy effectiveness?

- 7.1. It is proposed to add the Performance Management Framework as an appendix to the South Ribble Site Allocations DPD to ensure that monitoring of policy effectiveness is measured and transparent. The Performance Management Framework (Appendix1 to this response) includes clear timescales and milestones against which policy effectiveness can be judged and, if necessary, the flexibility of the policies will be used to make appropriate changes where necessary to improve outcomes. In addition, Chapter D of the Plan identifies timescales for the release of housing sites. Also, it should be noted that Masterplans will be required, where appropriate, to ensure delivery of infrastructure etc is achieved by key dates. These are not included in the Plan as realistic timescales will not be known until a masterplan is produced.

Other Matters

8. Other matters to be raised as necessary