

**Issue 12 – Infrastructure / Delivery/Flexibility/Monitoring/Implementation
Policy CP21**

Personal ID No: 3440

Terence O'Rourke Ltd on behalf of North Whiteley Consortium

**ISSUE 12 INFRASTRUCTURE / DELIVERY / FLEXIBILITY / MONITORING
AND IMPLEMENTATION – POLICY CP21**

- i) [Infrastructure] - Bearing in mind the funding required, is the overall strategy economically viable and practically achievable in the timescales envisaged and in the forms proposed and, if not, what should be changed to enhance delivery prospects? and**
- ii) [Delivery] - Is the necessary public and private sector funding likely to be available to deliver development on the strategic sites and elsewhere in the district, including via the proposed Community Infrastructure Levy?**

- 1.1 It is appropriate that new development contributes to the provision of new infrastructure to serve the new community. However, the North Whiteley Consortium remain concerned regarding the range and level of contributions sought. Viability appraisal tools should be utilised to ensure the levels of contributions remain appropriate and development proposals viable throughout the application process (both outline and reserved matters) to ensure delivery.
- 1.2 The viability report prepared by EC Harris confirms a viable development can be delivered at North Whiteley, on the basis of 3,500 dwellings which is supported by sound master planning and constraints analysis.
- 1.3 The report confirms that delivering the Council's aspiration for 40% of the housing to be affordable, at the required mix will be extremely challenging. It concludes that at a lower mix of up to 30%, depending on the tenure mix, the scheme would be viable and capable of delivering all of the necessary social and physical infrastructure that has been identified, whilst meeting the landowners reasonable expectations. The Council accepts the position that 40% may not be achievable and it is agreed that a planning application is the correct forum to examine such detail.
- 1.4 The delivery of North Whiteley will be privately funded. We note that currently there is no reliance on new public funding to deliver infrastructure directly attributable to North Whiteley. However the consortium reserve the right to adopt available grant in the future if this enhances viability or the affordable housing offering.
- 1.5 We note the Council's intention to introduce CIL, although to date this work has not yet been publicly progressed. CIL regulations state that in setting a charge, local authorities must strike a balance between revenue maximisation on the one hand and the potential adverse impact upon the viability of development on the other. The regulations also state that local authorities should take account of other sources of available funding for infrastructure when setting CIL rates. If the CIL

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rate are set too high, the Council risks stifling development, housing delivery and economic growth. Other sources of funding must be carefully considered and maximized, and an appropriate CIL rate found to ensure the burden of infrastructure delivery does not fall too heavily on new development, leading to viability pressure and stagnated growth.

- 1.6 North Whiteley Consortium confirms a wish for active engagement with the Council in the preparation of the draft charging schedule and associated preliminary work. However, it is envisaged that the outline application for North Whiteley will be submitted and determined prior to the adoption of CIL.
 - 1.7 The delivery of North Whiteley over the next 20 years will take place during a significant period of social, economic and environmental change. Policies relating to North Whiteley and its development, together with the master plan will need to be both fixed in terms of strategic direction, yet sufficiently flexible in their approach to delivery to respond to opportunities that change will bring. Maintaining flexibility to respond to change and opportunity over the plan period will be paramount to maximising development opportunities and delivering the vision and Core Strategy objectives
 - 1.8 The NPPF recognises the requirement to have regard to economic circumstances (Paragraph 1.74) and the need for reasonable flexibility to enable the plan to respond to changing circumstances. Sufficient flexibility must therefore be incorporated within the policies of the JCS to ensure that viability of development schemes are not undermined or delivery threatened in accordance with the government's priorities to deliver economic growth and new housing.
 - 1.9 It may be appropriate that a review mechanism is incorporated within the core strategy to ensure deliverability in the inevitable market cycles the project will experience. This would allow flexibility in areas such as affordable housing tenures, quantum of affordable housing and private housing tenures (rent / sale). Flexibility would allow continued delivery during a downturn offset by greater capture of value for affordable housing during more buoyant periods.
 - 1.10 This would ensure that the scheme is deliverable in the short, medium & long term, able to fund the required infrastructure, deliver significant affordable housing and offer appropriate returns to the landowners and developer partners.
- iii) **[Flexibility] - Is the CS reasonably flexible to enable it to deal with changing circumstances and, if not, what changes/contingencies would improve the ability to respond to new issues arising during the plan period, such as a lack of investment in major projects?**

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- iv) **[Monitoring] - Will the monitoring proposed throughout the CS, be sufficiently comprehensive and informative to achieve its objectives and if not, why not, and what needs to be changed? and**
- v) **[Implementation] - Are the implementation mechanisms identified sufficient and suitable to achieve their objectives, for example in relation to delivering the strategic housing allocations and, if not, why not, and what needs to be changed?**

No comment