

## Hearing Statement – Urban Extensions Policy CS7

1. Our submission on the matter of affordable housing and viability testing in general as submitted under Matter 4 is also relevant to this point. The current economic conditions and marginal viability for all schemes with any quantity of infrastructure provision mean that for delivery to be achieved on the trajectory envisaged will require a flexible approach to Community benefits.
2. Because the Council have undertaken no up to date viability testing on the plan, and are using what is now historic information, they are not in a position to assess the issue of viability in any meaningful way.
3. Whilst there is scope under the policy to submit specific viability evidence in negotiation planning obligations, it is detrimental to delivery of schemes for the headline rates of affordable housing to be excessive. It also imposes excessive cost upon developers to have to challenge these community benefit levels on a case by case basis, which is dampening interest in development.
4. The bulk of development will occur through larger allocations and broad areas of growth. It is clearly appropriate for such areas to have master-planning that sets out a strategic vision for the development, coordinating infrastructure, land uses and phasing. However it is not accepted that for this form of development, as required by Policy CS7, a comprehensive scheme, involving all of the land within an allocation, is essential at the outset.
5. Some allocation areas are of a size where development may be over a significant period and involving many landowners. The expectation that all landowners will coordinate to the extent of being legally bound into a scheme at the outset, if their land involvement is proposed to be a later phase, is unrealistic.
6. The requirement should be rephrased to require a master plan for the area identifying the infrastructure requirements, and the triggers for their delivery, and demonstrating how the initial phase(s) and essential infrastructure for these can be delivered, without prejudicing either future delivery of the remainder of the scheme or its viability, and ensuring that all essential infrastructure for later phases can be provided as those progress.
7. If a proposal follows these principles there is no reason why a scheme cannot be developed on a phased basis, without needing all landowners contractually bound at the outset, which in an area where viability is marginal, and development proceeds to those in later phases on the horizon rather than available up front, may not be possible to achieve. Obtaining involvement in S106 agreements is not always practical in such circumstances
8. It is submitted that the emphasis on the need for schemes to be comprehensive is excessive and likely to hamper delivery of the growth the Council seek.
9. The Council will no doubt highlight the risk of schemes starting without sufficient control of the whole allocation area to ensure it is delivered. It is submitted that, with the suggested safeguards, this is not the case, but in any case it is questioned if there is actually demonstrable harm if part of an allocation comes forward but not all, provided it happens in a way that does not prejudice development of the remainder at a later stage.
10. For example principal accesses and service provision into a scheme need to be of sufficient capacity for the whole, sites for new schools need to be of sufficient size to accommodate the planned capacity, even if the buildings are delivered in phases as the need occurs, but if the owner of the second phase wishes to delay the delivery for a period to coincide with

retirement or to give time to relocate to another site, such that delivery is later in the plan period, and so they will not legally commit at the outset, does this damage the plan aspirations. We would submit the risk of significantly more damage to delivery is caused if the whole scheme cannot proceed because only for example 50% of the area will commit to the scheme on day one.

11. It is considered that requiring wholesale commitment by all landowners involved from the outset runs the risk of stagnation and non delivery.
12. It is submitted the text of CS7 thus needs to be amended, so that applications reflecting circumstances where an acceptable initial or subsequent phase of a larger scheme, for which a strategic master plan has been prepared, either formally as an SPD, or informally as a supporting document to accompany the proposal, is submitted for approval, making suitable provision for all infrastructure necessary for that phase, and of sufficient capacity so as not to prejudice the delivery of other phases, are supported to ensure the earliest possible delivery of development in accordance with the plan. The Core Strategy is considered unsound without this alteration on the basis of it being not justified or effective in achieving delivery of the proposals.