

CHAPTER TWELVE - IMPLEMENTATION AND MONITORING

12.1 POLICY IMP 1: PROVISION OF INFRASTRUCTURE

(Proposed Change 82)

Representations

West Quay Shopping Centre Ltd	IMP1-352/12-ID-O
Consortium Of Registered Social Landlords	IMP1-526/38-ID-O
Quintain Estates & Development plc	IMP1-981/5-ID-O

Issues

- a. Whether the policy is unduly prescriptive.
- b. Whether the Plan provides Performance Indicators to adequately monitor affordable housing provision.
- c. Whether the policy and supporting text is sufficiently specific and accords with government guidance.

Inspector's Reasoning and Conclusions

- 12.1.1 Policy IMP I was redrafted at Revised Deposit stage and several objections have been withdrawn. West Quay Shopping Centre Ltd considered that it is too prescriptive. However this was an objection to the policy in the Initial Deposit version and there has been no subsequent clarification from the Objector as to whether the revised policy is considered to be unsatisfactory, and if so in what way. It seems to me that it offers clear guidance as to what is needed in the way of infrastructure in support of development. I do not therefore consider that changes are warranted in response to this objection.
- 12.1.2 The Consortium of Registered Social Landlords (CRSL) consider that the performance of the Plan's affordable housing policies should be measured by a range of indicators, including the number of applicants on the housing register and the number of households presenting as homeless or in temporary accommodation. The Objectors say that this is information that is already available to the Council. Table 12.1 of Performance Indicators includes the number of affordable housing units developed in the Homes and Housing section of the Plan. This demonstrates the success or otherwise of the supply side of the equation. However, Paragraph 12.7 of the Plan indicates that another purpose of monitoring is to ensure that the assumptions on which the Plan is based still hold good. Policy H4 of RPG 9 requires local authorities to monitor the provision of affordable housing against their local target and to carry out regular reviews. It therefore seems to me that it is important to consider the demand side of the equation as well. The Performance

Indicators suggested by the CRSL thus seem to me to be relevant for inclusion within the Local Plan.

- 12.1.3 I do not agree with Quintain Estates that the items listed in Paragraph 12.5 are confusing, overly general or otherwise difficult to understand. It is made clear that the measures that will be sought through planning obligations will vary from development to development. It seems to me that the important matter is to ensure that whatever improvements are sought are necessary to meet the needs of the development rather than to remedy an existing deficiency. Such advice is contained in Circular 1/97: *Planning Obligations* and Policy IMP 1 accords with it. I see no reason to change the Plan in response to this objection.
- 12.1.4 The Council has indicated that it will be preparing SPG to guide developers on the nature and content of planning obligations¹. In the circumstances, I consider that reference to the use of SPG should be included in the supporting text.
- 12.1.5 As I have said in a number of other places, planning obligations should be sought and negotiated but cannot be required. The policy and supporting text should be revised accordingly.

RECOMMENDATIONS

I recommend that the Plan be modified as follows:

- ◆ **By including Performance Indicators that relate to the demand for affordable housing in the Homes and Housing section of Table 12.1.**
- ◆ **By adding a further sentence to Paragraph 12.3 that SPG will be prepared to give further advice on the nature and content of planning obligations.**
- ◆ **By replacing the word “required” with “sought” in the third sentence of Policy IMP 1 and the second sentence of Paragraph 12.5.**

¹ See Paragraph 5.5.4 of my Report.