

## **MATTER 15. FLEXIBILITY/MONITORING**

**Question 15.1. What Happens If?** *The CS is very specific about where, how much and what type of development is intended to take place over the life of the CS., particularly in its early years. What contingency plans are in place should this development not take place in the manner anticipated? How would the situation be monitored? What would be the trigger points for implementing any contingency plans?*

1. This question is a key consideration to the effectiveness of the CS and we welcome the Councils view on it at the Examination.
2. Whilst Chapter 13 of the CS sets out some limited guidance on how to manage and monitor the delivery of the Strategy, including an “integrated delivery plan”, it is difficult to understand how potential contingencies can be dealt with in a positive manner.
3. For instance, Appendix I of the CS sets out a “*delivery risk assessment*” which seeks to assess the risk and potential action to respond accordingly in the event that things do not go to plan. In particular, it identifies potential risks such as “*developers choosing not to develop sites,*” and applicants submitting “*speculative planning applications for out of town retail, housing and employment*” and considers that the implication of this is that it may “*undermine the Strategy if developers choose not to deliver the allocated sites*”.
4. The risks identified are very real and pertinent scenarios which may arise in time, and indicate a sense of uncertainty about key infrastructure providers and the development industry proactively responding to the policies of the Strategy. Indeed, it reflects the need for an appropriate balance in terms of policy objectives, and responding to the needs of the development industry to assist in the delivery of these objectives. Without this balance, the CS is unlikely to be deliverable or effective. Therefore, conversely the Strategy could be undermined if developers are not provided with the appropriate flexibility to actually deliver it.
5. For example, this applies to “*planning applications for out of town retail*”. Instead of recognising the potential enhancements and complimentary roles that edge and out of centre development has in safeguarding the role and function of cities like Salisbury, the CS presumes this is going to have a harmful impact. On the contrary, there is evidence which suggests an urgent need to provide additional foodstore provision within Salisbury (discussed in detail in Matter 10). This need extends beyond the quantum envisaged within the CS, and the current wording within Core Policy 7 is too prescriptive for a Core Strategy policy and would be more appropriately provided in a Development Brief or Masterplan SPD for the site.

6. Therefore, instead of being a threat or adding to the pressure, proposals in less central locations can often enhance, relieve pressure and curb against the loss, or leakage, of trade to competing centres (such as Southampton and Bournemouth).
7. Throughout all the Hearing Statements, we consider that it is vital for the CS to be sufficiently flexible to handle contingencies and deal with changing circumstances which may arise through the uncertainty with the emerging RSS. This would ensure that in situations where things do not go according to plan, the strategy is not completely undermined and undeliverable.
8. The Council identify at paragraph 13.2 of the CS the role of the Annual Monitoring Report in regularly reviewing milestones if delivery does not come forward as planned. Furthermore, there is an “Integrated Delivery Plan” at Appendix E which sets out the indicators to monitor progress through. However, in determining what would be a “*trigger point*” for implementing any contingency plans, this is inevitably a challenging matter to come to terms with.
9. A potential difficulty here is that most of the housing and employment requirements of the draft RSS are proposed to be provided through the designation of Strategic Allocations. This inherently reduces the flexibility to respond to possible changes in the Core Strategy (and also the draft RSS).
10. This may also make it more likely that more frequent updating or review is required. In particular, PPS12 clarifies that “*The need for frequent updating may be reduced by taking a long-term view and providing some flexibility. So for, example, if a strategy has some room for manoeuvre, it should not need to be updated simply because there has been a change in the housing numbers in the regional spatial strategies.*” (4.14)
11. In essence, the CS is about setting a framework to positively respond to local challenges. If a robust framework is in place, this should enable the CS to be less susceptible to needing change. It may therefore be appropriate to consider whether all proposed housing and employment Strategic Allocations are progressed as such in the CS or whether some could more appropriately be left for the subsequent Site Specific Allocations DPD. The SSA DPD would provide additional time for the Council to gather evidence and consult further to ensure a sounder framework for the allocation of sites, but importantly not preclude development coming forward in the meantime which satisfies relevant tests set out in National Policy and specifically within the CS.
12. Therefore in the event that a site is delayed or there is uncertainty which arises within the plan period, segregation from the CS (but inclusion within the SSA DPD) could enable other up-to-date sites to be pursued to ensure

an adequate supply is maintained and the overall CS vision is supported and sound.

13. In conclusion, we consider the CS therefore needs to be flexible enough to deal with contingencies. The CS should not be overly prescriptive and “site led”, but rather focused on delivering the framework to respond to local challenges. The focus of the site allocations should be the role of the SSA DPD, which will specifically deal with triggers for contingency in more detail.