

## **Southbourne Parish Neighbourhood Plan Review**

### **Viability – Technical Note**

Planning Practice Guidance section ID10 issued in May 2019 established new responsibilities that fall to ‘plan-makers’ when engaging with land promoters.

“It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers. It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies.” ID10-002

Southbourne Parish Council therefore invite you to provide a statement on viability to explicitly address the guidance and to confirm any known abnormal costs in developing the land in a policy compliant manner that may hinder its viability. While it is for the land promoter to decide how to approach this task, the Parish Council suggest regard should be paid to Chichester DC Local Plan Review evidence base; the development principles set out in the CDC Preferred Approach Policy AL13; and the ‘Vision’ and ‘Brief’ provided to you by the Parish Council.

### **Viability Statement submitted by the promoters of Land East of Southbourne Village**

Thank you for your query seeking clarification on viability for the proposal east of Southbourne. As mentioned, recent amendments to the NPPF and guidance on viability and plan making ID10-002 encourage promoters to engage with plan makers to illustrate sites are viable and can accommodate policy requirements such as affordable housing and social infrastructure.

As highlighted in ID10, assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Additionally it also highlights that the assessment of sample site evidence can support plan making decisions. In order to assist and illustrate strategic sites similar in typology to the land east of Southbourne can be brought forward viably; we would like to draw your attention to evidence submitted by Chichester District Council on strategic site viability during examination for the CIL charging schedule. We are of the view that data contained within the charging schedule can be considered satisfactory as a robust evidence base which illustrates the viability of strategic sites within the Chichester District area and can also be applied to the Southbourne site.

The appraisals undertaken by Peter Brett Associates assessed a range of sites within Chichester including land West of Chichester, Westhampnett, Tangmere and Shopwyke. When putting together their charging schedule, Chichester undertook a robust and in-depth viability analysis across a range of strategic typology sites within Chichester, determining

greenfield strategic land development was viable and could accommodate appropriate affordable housing provision, infrastructure costs, assumed abnormals, CIL charge and on-site S106 obligations. These calculations were stress tested to ensure variability of value and cost changes and determined that strategic sites within Chichester following reasonable obligations were well within theoretical limits of viability. This evidence base was inspected by the Examiner, found sound and adopted to form part of the local plan and as such should be considered satisfactory to support local and neighbourhood plan allocations of sites at the draft stage (Source: Chichester DC CIL – Strategic Sites Appraisal Evidence Base)

For example, the site West of Chichester (LP Policy 15) is comparable to the Southbourne numbers at an allocation for 1250 dwellings, with overall potential to accommodate circa 1,600 homes. The site is clear, relatively flat and in agricultural use, as such highly comparable in typology to the Southbourne land. The site was tested as part of the CIL viability appraisals using assumptions on known S106 costs, including education provision (primary school) provision of a NHS medical centre, green infrastructure, country parks, playing fields, allotments, social infrastructure (community hall) and land provision.

It is important to note, drafting of plan policies should be iterative. And whilst the role for viability is helpful at the plan making stage, any assessment being undertaken is limited by the information available. Currently, as the site east of Southbourne is not a draft allocation and in the early stages of planning, any viability analysis would be considered 'high level' given the limited transport, geotechnical, landscape information in place at this stage. Whilst the Consortium have undertaken high level financial appraisals of the site east of Southbourne, these are very early models and not to the level of accuracy of those contained within the CIL evidence base. As with the land West of Chichester (LP Policy 15), the Southbourne site is relatively level, green field agricultural land, and as such there is no expectation for abnormals in the ground. In order to ensure policy compliance and viability, our initial modelling does incorporate and make provision for the policies as set out in AL13, these include affordable housing, S106 contribution payments, S278 works, CIL, infrastructure, green infrastructure and associated public open space provision. We have also modelled for the inclusion of overbridges as required in the emerging SNP and AL13. Following stress testing, we would not anticipate these having a material impact on viability and confirm we expect to deliver the scheme and it is policy compliant in line with Local Policy AL13. Additionally, infrastructure cost pressure is reduced following determination the junction infrastructure on the A27 or the installation of a new train station is not required.

However, given the relatively low resolution of modelling undertaken, commercial sensitivity and the speculative assumptions currently in place for our models, we are currently not at the stage where we are in a position to provide fully robust costs data which can be relied upon and are of the view that the CDC CIL evidence base should be considered the most suitable and robust during this phase of the plan process. However, as further technical information is collected and the plans evolve, we expect to be able to provide more robust information to help illustrate viability and will be able to achieve this prior to adoption of the Neighbourhood Plan.

**1<sup>st</sup> August 2019**