

**Examination of the Spelthorne Core Strategy
and Policies DPD**

Topic Paper on Matter 13

Implementation and Monitoring

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1. Introduction

- 1.1 This Topic Paper deals with the Inspector's questions on Chapter 13 of the DPD 'Implementation and Monitoring'.

2. Background

- 2.1 Guidance on the monitoring of Local Development Frameworks is provided in PPS 12 'Local Spatial Planning' – 2008 – para 4.47 (page 18) and 'Local Development Framework Monitoring: A Good Practice Guide'.
- 2.2 PPS12 requires (para 4.47) core strategies to have clear arrangements for monitoring and reporting results. It identifies particularly the role of the Council's Annual Monitoring Report in reporting progress of the plan against relevant targets including 'core output indicators'.
- 2.3 The Good Practice Guide advises against large numbers of indicators but instead the minimum necessary to assess policy implementation. Para 4.29 suggests a maximum of 50. The table on page 39 of the Guide notes the indicators may need to be refined in the light of the Inspector's recommendations on a DPD.
- 2.4 LDFs must be founded on a credible evidence base and from which appropriate strategies and policies will be developed and appropriate targets and indicators derived.
- 2.5 Chapter 13 of the DPD follows the format recommended in the Good Practice Guide. The DPD is founded on an extensive evidence base and informed to the targets and indicators selected. In respect of housing delivery the Housing Trajectory at Appendix 2 is also relevant.

3. Response to the Inspector's Questions

Key Issue: Does the DPD contain clear mechanisms for implementation and monitoring?

- (i) **Does the Core Strategy contain targets and milestones relating to the delivery of the policies, with clearly identified delivery mechanisms and timescale for the implementation of policies along with a clear indication of who is intended to implement each policy?**

- 3.1 The Implementation and Monitoring Framework within Chapter 13 sets out for each policy of the DPD relevant targets, indicators and main delivery agencies who are intended to implement each policy. Where possible and appropriate specific policies identify numerical requirements and these are reflected in the targets. In most cases policies apply to the plan period as a whole.

(ii) Should the Core Strategy say more about the monitoring of targets and indicators, and should there be community involvement in the monitoring process?

- 3.2 Chapter 13 on Monitoring is already 11 pages long. This is considered appropriate in setting out the subject matter in an appropriate level of detail, but nevertheless makes the DPD as a whole quite long in relation to the understood aspirations of the Government Office. It is considered it contains all necessary information and there is no need to lengthen it.
- 3.3 There are no statutory requirements or other national guidance requiring public involvement in the monitoring process in terms of consultation on finding/recording of facts. Councils are required to publish Annual Monitoring Reports which enable the public to have access to monitoring information and understand the extent to which a DPD is delivering what is intended. These reports are not required to be subject to consultation – indeed the timescale in which they need to be submitted to the Government Office would not make this possible.
- 3.4 The request by some parties for such consultation is not supported by any evidence to demonstrate this is required or that the DPD would be unsound without it.

(iii) Does the Core Strategy indicate how key policy objectives will be achieved and take account of the resources that are likely to be available for implementation?

- 3.5 Chapter 13 identifies the specific delivery agencies involved in implementation in the Implementation and Monitoring Framework. One of the key elements of delivery in the DPD is housing. Para 13.5 explains the location of the Borough is in an area of high housing demand where the development industry is actively bringing forward housing development. This is also reflected in para 4.4 of the re-advertised version of the DPD. That 'version' and Policy HO1 (a) also refer to the role of the Allocations DPD in identifying specific housing sites and other proposals to assist policy delivery.
- 3.6 Additional text on the 'spatial strategy' in the re-advertised version of the DPD (chapter 4) gives further emphasis to the means by which the key policy objectives will be delivered including any resources that may be required. Particular evidence has been gathered on the financial viability of providing affordable housing and the 'resources' that are essential to deliver the policy requirements made on this issue.

(iv) Where the actions required to implement policy are outside the direct control of the Council, what evidence is there that there is the necessary commitment from the relevant organisation to implementation of the policies?

- 3.7 Appropriate commitment has been secured and may be best illustrated by looking at the following key issues:

- a. Housing supply overall
 - (i) The Council's valuation consultant has confirmed the inherent demand and buoyancy of the housing market to deliver housing across the plan period as a whole.
 - (ii) The Council has established the commitment from the owners of all the larger housing sites of 0.4ha in size or greater (including Allocation sites) to bring their sites forward.
- b. Affordable housing
 - (i) The Council's valuation consultant has confirmed the viability of the Council's policy requirements.
 - (ii) The Council has five 'preferred' Registered Social Landlords who are working with the Council to deliver affordable housing.
- c. Extra Care Housing - The Borough is actively working with the County Council and appropriate RSLs to bring forward schemes.
- d. Flooding – The Environment Agency has agreed the policy approach which includes support for comprehensive flood risk management measures. The EA are pursuing particular scheme options.
- e. Staines Town Centre retailing – The Council is freeholder of the Elmsleigh Centre and has active partnership arrangements to deliver further retail expansion (see also the draft Planning Brief for the Elmsleigh Centre).
- f. Community facilities and Open Space, sport and recreation – The Council is a significant owner of facilities and works closely with the County Council who is also a significant provider and owner of community facilities. The Council has close working relationships with key community groups/organisations, including the Primary Care Trust, through its Local Strategic Partnership.

(v) Should the indicator for Policy HO4 (b) indicate how many completions of extra care units per annum would be considered acceptable?

3.8 The total requirement of 400 units over 20 years would require an average of 20 units per annum. The indicator requires a record of completions per annum. The inclusion of 20 per annum, as suggested by the question, could be misleading as it suggests provision of schemes of this size or less are feasible. The minimum size of viable schemes for extra care is about 40 units and typically between 40 and 60 or so. The current wording is considered simple and sufficiently clear to see what the pro-rata annual average ought to be without implying a scale of individual schemes each year which would not be achievable.

(vi) Should the targets and indicators for policies HO6 and HO7 contain any measure of need for sites?

- 3.9 The needs of gypsies and travellers is currently the subject of a study by SEERA for an amendment in due course to the South East Plan. Studies of need have been undertaken in all areas of the South East and public consultation starts in September 2008 for 12 weeks on options for meeting that need.
- 3.10 Current provision in the region is variable with Counties such as Kent and Surrey already making significant provision, and others, e.g. Hampshire and the Sussexes making much less in relation to the proportion of unauthorised sites they have. (See Table H1 page 91 of the draft South East Plan). Options that will be consulted on this autumn by SEERA include approaches to ensure a more balanced provision.
- 3.11 It is proper for a DPD to reflect the Regional Spatial Strategy (RSS), but currently the South East Plan has no agreed targets on this issue. It would be unsound to include targets in Policy HO6 and HO7 which had not been subject to public consultation or SA and might conflict with what is in the process of being prepared at the regional level. As the DPD records at para 6.31 there is no 'problem' of unauthorised sites in the Borough and no need to identify targets or sites in advance of the current regional plan work. Para 6.31 recognises the plan might need to be partially reviewed if increased provision, as a result of the RSS, was needed. It is considered, in the circumstances, the DPDs approach is appropriate.

(vii) Is the target for TC5 appropriate? Would an indicator of the amount of retail development permitted outside the town centre assist in monitoring the second part of the policy?

- 3.12 The strategy of the DPD is that town centres and other local centres should remain the focus for retailing in the Borough (Policy SP4). This is reflected in the first part of Policy TC5 and criteria are included against which proposals outside of existing centres would be considered.
- 3.13 The target states "All new development should be within Staines, Ashford, Shepperton or Sunbury town centres". This properly reflects the DPD's strategy. The indicator is the Core Indicator CO1 4b which is set out in national guidance. It requires the amount of completed retail development in town centres to be recorded, which we interpret as requiring an absolute amount of floorspace and its expansion as a percentage. The information is already recorded in the Council's Annual Monitoring Report – see Table 27 page 33 of the 2007 AMR. This table records amongst other land uses, the total amount of retail floorspace completed in town centres in the first column, and the percentage in a second column. The percentage figure indicates the extent to which the target is being met.
- 3.14 It is considered no change to the indicator is required as it already enables the amount of development outside of town centres to be identified and is therefore sound.

(viii) Is the target for Policy CO1 (maintaining existing overall level of facilities) consistent with the policy's aim of supporting the provision of new facilities?

3.15 It is agreed the target could be helpfully amended and an appropriate recommendation made. The following is suggested: "To ensure community facilities are provided to meet local needs".

(ix) Are the indicators for policies EN1, EN2 and EN9 likely to give a meaningful indication as to whether the target is met?

3.16 All three policies are criteria based policies against which development proposals will be assessed. They deal respectively with Design of New Development (EN1) Replacement and Extension of Dwellings in the Green Belt, including Plotland Areas (EN2), and River Thames and its tributaries (EN9).

3.17 For Policy EN1 the 'target' is to 'achieve high standard in design and layout of new development'. For Policy EN2 a 'target' is missing but should be 'to ensure the replacement and extension of properties consistent with the Green Belt and as appropriate to the setting of the River Thames'. For Policy EN9 the 'target' is 'use development proposals as an opportunity to enhance the setting of the River Thames and its tributaries.

3.18 As currently drafted the 'indicator' in each case is 'percentage of schemes with appropriate design and access statement'.

3.19 As all approved schemes would need to have 'appropriate' statements demonstrating they are acceptable, it is agreed a more meaningful indicator is needed. It is suggested an indicator should measure the extent to which applications that are received meet the policy requirements. The indicator in each case could be 'percentage of all applications refused as not being in accordance with the policy'. If the percentage of refusals were high it might suggest an amendment to the policy were required to make clear to developers what was needed to produce an acceptable proposal. Conversely a low level of refusals may indicate the policy is achieving its objective of securing appropriate standards of design.

(x) Is the target for Policy EN3 achievable or merely aspirational?

3.20 The target is achievable because it relates to a range of controls which already exist and, with the introduction of quieter aircraft, the area affected by aircraft noise will reduce. Whilst the Council does not itself have direct control of the contract measures, other authorities (London Borough of Hillingdon, BAA and CAA) do have controls. The Policy is, therefore, deliverable (and being delivered) and therefore achievable. It is, therefore, a relevant target.