

Keynote - Monitoring of the Core Strategy

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1 Introduction

1.1 The Inspector has requested further information in respect of the Core Strategy (CS) and transport matters. His request is reproduced below:

1.2 “This is to confirm the Inspector's request at the PHM (pre hearing meeting) on 6th Sep 2011 for the Council to please prepare three further Keynote Papers (along the same lines as those already provided) on the following matters:

1. Monitoring Indicators - notwithstanding what is said in policy CSP.17 and paras 4.17 to 4.22 of the CS, and in the absence of a comprehensive Infrastructure Delivery Plan (which will be necessary if the Council wishes to introduce a Community Infrastructure Levy in the future), a keynote paper (that could perhaps be added into the CS as a further Appendix) setting out more detail of the Council's proposed monitoring of the CS would be helpful. In particular, this should address what indicators the Council expects to use and set out the expectations against which success or otherwise of delivery of the CS objectives will be judged, as well as the margins outside which a review of policy or policies would be triggered. This can be largely based on what is already being done in the context of the Annual Monitoring Report but as now to be focussed on the outcomes arising from the objectives, policies and proposals of the CS.

1.3 In terms of monitoring the implementation of the CS, there are a number of mechanisms in place. These will provide a reasonably comprehensive basis for monitoring its implementation.

2 Monitoring

2.1 The delivery of new and appropriate employment and housing are key requirements of the CS and these two areas will continue to be monitored as follows:

Housing

2.2 The CS' requirements in terms of the availability of land for housing and the delivery of new dwellings are already comprehensively monitored. The information that is currently available and will continue to be so includes the following:

Land supply

2.3 The maintenance of an appropriate land supply for housing is part of the function of a development plan and monitoring of the supply and by implication the performance of the plan is essential.

2.4 Land available for housing is assessed annually although the basic figures are updated on a quarterly basis. Sites considered available include permissions granted and land allocated in development plans. There is a current up to date SHLAA (strategic housing land availability assessment) which looks at the potential future supply of land and considers a variety of types of site, including those which may have potential but do not yet have planning permission. These could form a source of potential sites if additional allocations were needed. The present situation is that sites of this nature which are not within defined settlements or where there are other allocations that would mitigate against their use for housing are not needed. The SHLAA "panel" also assess sites that have permission or are current allocations in respect of their ability to deliver dwellings and the currently assessed supply has been agreed in this manner.

2.5 Land from current permissions and from allocations being carried forward from the Local Plan are the only sources of supply that are required because they can deliver sufficient land (or dwellings) for over ten years assuming an annual requirement of 310 dwellings per year. There is currently in excess of five years' supply of land for housing which is assessed as being available within five years. This is currently measured in the Housing Keynote (2) (CD10) as 5.57 years supply, although if the availability is simply compared with the annual requirement over five years (not adding in the under achievement from 2006) then 6.6 years supply is available. A further consideration would be to look at the land capable of being developed within five years without making assumptions about the current relatively slow market and this would show potential for over six year's land to be available within five.

Housing completions and permissions

2.6 In addition to the availability of future sites for housing, the delivery of completed dwellings is monitored, against the annual requirement used in the CS (310). Permissions are monitored with recording of starts and completions. The size and tenure of each site is recorded as is its location. Figures are available for each quarter but are published in summary form in the annual monitoring report. They are summarised in this and in the Housing keynote (CD10 in two parts).

Employment land

2.7 Completed floorspace is monitored at present through the planning applications system and this does provide an annual summary which is carried through into the Annual Monitoring Report (AMR). This is capable of providing the basics of location, type and status (whether outline permission, detailed permission or completed). From April 2011 a joint Gloucestershire database is being used for recording and monitoring of employment data. It records floorspace, use class and enables estimates of employee numbers (from planning application information) to be added. The nature and location of the site is also recorded.

2.8 In addition to the recording of employment development as it is permitted and the ability to record land and or floorspace that is “available” from planning permissions, much employment land or floorspace is available from the existing range of sites and premises as are listed in the keynote Economy- land for employment (CD7). This list will be maintained and updated as a record of employment sites throughout the district. It is a comprehensive list of existing sites and records land that is assessed to be potentially available for the intensification or expansion of employment sites. The assessment takes account of planning policy and the list includes land that is identified under the outgoing Local Plan and the development of which is supported by the Core Strategy.

2.9 Individual plan allocations are reviewed on an annual basis (see AMR 6.6 on, CD 32). This will continue under the CS.

Contextual monitoring

2.10 In addition to housing and employment delivery or the availability of land for those purposes, and other direct aspects of monitoring, there are important background areas of monitoring which contribute to the understanding of how the CS is implemented and what its impact may be. These areas of contextual monitoring may also provide important information in other areas. These are areas where the CS has some influence but is not the prime instrument of delivery or control. Contextual monitoring as described below may indicate the need to modify the CS or other planning policies because of particular trends. It may, especially in the longer term also pick up changes that are partly the result of the CS having the desired effect within its community.

Population

2.11 From published sources, including the County Council and DCLG (ONS).

Economy

2.12 Economic forecasts and studies, employment and unemployment levels, employment structure,

Health

2.13 Limiting long term illness, life expectancy, and the incidence of certain diseases will continue to be monitored and the published results of such measurement will be used in monitoring long term trends for the CS.

Crime and Safety

2.14 The intention of the developments proposed is that they should be safe and should not encourage crime. This will be monitored within the overall published crime statistics.

Education

2.15 The relative lack of skills and attainment is a key issue for the CS and the steps it puts in place alongside the AAP to address this will be monitored- using published statistics. Some are measures which will be long term (eg percentage of workforce educated to a certain level) others such as trends in attainment at certain age can be monitored on a year by year basis.

Transport and commuting

2.16 The overall levels of out commuting are recorded at least in the ten yearly census but individual counts and surveys are also taken from time to time. It is considered that such matters as the shift in the use of modes of transport will need to be monitored over the longer term and the basis for this is in existence. In addition to the periodical traffic counts, there is some data on rail usage which will be used.

Dwellings and Households

2.17 Household projections are monitored in order to assess the appropriateness of the CS. Although a major change could necessitate a review of the CS it is more likely that revised projections will be taken into account as its end date is rolled forward. In addition to the availability or newer forecasts, it is expected that increasing use will be made of the model which has been jointly commissioned by the Gloucestershire LAs and which can be used to assess the impact of various things (such as the performance of the economy or overall build rates) on the affordability

of housing. At present the CS uses the proposed level of provision approved by the Secretary of State in the draft RSS. This tallies closely with the 2010 Gloucestershire County Council projections and the latest from DCLG.

2.18 From the monitoring information above, an annual housing trajectory is prepared showing the likely number of completions over the next 10 years. It is based on the assessment of availability and takes into account the generally slow market conditions. In the early stages of delivery are a number of significant sites in the district that have permission and are being developed with the benefit of HCA subsidies. All sites with a capacity of more than five dwellings are individually assessed and monitored (all permissions are in any event individually monitored). The trajectory is one where higher numbers of completions are suggested in the earlier years of the CS. This is partly a function of the large number of existing permissions and also of the fact that sites which are neither allocations nor have permission cannot be included in the future supply.⁰

2.19 Besides the numbers and tenure of new dwellings and the land available for future building, the percentage of the total built on previously developed land continues to be recorded as does the overall density achieved. The numbers of affordable houses delivered and their tenure is also noted.

Retail provision-

2.20 The allocation in the CS and any taken forward into the allocations DPD will be monitored against the development of additional floorspace. The requirements of the area will also be kept under review in order to take account of longer term trends.

Development,. drainage and flood risk-

2.21 Developments contrary to EA advice on flood risk are recorded on an annual base and can therefore be studied. Other development permitted contrary to EA advice will also be monitored. The implementation of SUDs schemes is monitored.

2.22 Biodiversity- Whilst there is much information on the many sites in the district that are accorded some form of protective designation, there is little information regarding their condition. Basic information such as the numbers of applications granted that affect some of the sites is available but the expectation is that no permissions are given without adequate mitigation or that permissions given will not have any significant adverse effect on protected sites.

⁰ There is however an allowance for completions on the smallest sites (1-5 dwellings) in accordance with the principle agreed by the SHLAA panel.

Renewable energy capacity

2.23 Installed renewable energy projects are monitored and can be recorded for the district.

Listed buildings

2.24 Number and condition, including the number “at risk”.

Monitoring of the CS summary table

2.25 The policies within the CS will be monitored in the manner described above and the methods and information sought for this is summarised below under each policy. Some use is made of statistics already collected for another purpose and the contextual indicators in particular make use of this type of data. There will be instances where data is required specifically for the CS and systems are in place or are being put in place for monitoring these.

2.26 The CS itself records the basic means of monitoring. This appears under each policy, in the monitoring section (8) and in the settlement section, following 7.4. This last reference is to a table which provides indications for monitoring housing, employment, commercial floorspace and the implementation of key infrastructure projects.

Monitoring of the CS- summary

CS policy	How it will be monitored	Specific measures to be used	Expectation and variation
CSP 1	Use of policy and supporting guidance to secure design quality- extent of loss of protected habitats and other areas eg floodplain. Measure new green infrastructure provided	Development taking place in areas of flood risk, SUDs schemes, development contrary to EA advice, (number of schemes and no of dwellings) Development that is refused or conditioned because of ground conditions and potential sterilisation of mineral resources/ reserves. (number of schemes)	Single instances will be recorded. but single developments in areas of flood risk, in conflict with mineral reserves or unstable ground will not be sufficient to require amendment to CS. CS minimises conflict so few if any instances will be recorded of loss of habitat. Mitigation and any such losses will be recorded.

		<p>Measure extent of loss of protected habitats (area and number of sites)</p> <p>Measure extent of new green areas provided (area and number of sites)</p>	
CSP 2	<p>Development proposals evaluated against checklist of adaptation measures</p>	<p>List of measures used and enhancements achieved under the policy headings. (Record percentage of new developments that implement SUDs, and water efficiency measures (exclude extensions and minor development)</p>	<p>SUDs is expected in 100% of developments unless a clear exception is agreed</p> <p>Water efficiency measures in 100% dwellings</p> <p>Flood risk assessments in 100% cases requiring them</p> <p>Enhancements and green infrastructure evaluated on case by case basis, against any future DPD allocations or other identified requirements.</p>
CSP 3	<p>Percentage achieved measured against policy requirements. Other contributions from smaller developments monitored and recorded</p>	<p>Overall level of CO2 emissions (measure of renewable energy generated or provided by developer).</p> <p>Installed capacity for renewable generation-</p> <p>Energy efficiency of buildings (eg CSH for dwellings and</p>	<p>Achievement against CS targets monitored, policy will be reviewed if there is significant variation (eg 20% eligible schemes do not deliver)</p> <p>Installed renewable energy capacity will be recorded against any local targets</p>

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		BREEAM for other buildings- number meeting the relevant level, (for example CSH level 3, BREEAM good or very good.)	Monitoring against government targets for BREEAM and CSH- CS policy will be updated / reviewed in step with these
CSP 4	<p>percentage of new housing within settlement boundaries</p> <p>Overall monitoring against trajectory. Measure of distribution against distributions indicated in policies below.</p> <p>Where external funding is involved, its expenditure on projects and their completion will be monitored. Provision of services and development by service providers (eg PCT) will be monitored as development and in case of potential constraints distribution and number of dwellings</p>	<p>Number of new dwellings within settlement boundaries.</p> <p>Location of new dwellings by settlement.</p> <p>New service development</p> <p>Employment development</p> <p>Infrastructure and resources- the provision of infrastructure will be assessed against any prevailing plan (eg for CIL) which assesses requirements. In addition standard monitoring of S 106 agreements will show when developer contributions are spent.</p>	<p>Monitored as a trend or percentage, the expectation is a trend towards a higher percentage of completions in towns and other settlements- see CS 7.4. For numbers and distribution.</p> <p>Distribution and numbers of dwellings reviewed against policies for other development.</p> <p>Employment development is expected on allocated sites and elsewhere, and will include a wide range of uses.</p>
CSP 5	distribution and number of dwellings completed, affordable dwellings	As above but with increased detail re new dwellings- monitor	Tenure and mix of dwellings delivered- expected to be broadly in

	<p>completed, number of affordable houses delivered against potential number that policy could allow, approximate mix between settlements, percentage of new house building on previously developed land and measurement of density. To be used for assessing overall provision, distribution, type, tenure and for relating the number of completed dwellings against employment land/ employment.</p>	<p>tenure and size with location- using table in policy as reference. Number and location of affordable housing units delivered.</p>	<p>line with with CS expectation and SHMA advice</p> <p>Number and percentages as specified in settlement policies- see CS 7.4. Variations from the expected trajectory for housing delivery will be monitored though some deviation is expected.</p>
CSP 6	<p>Monitor permissions granted and development of sites against the prevailing needs assessment</p>	<p>Include in AMR assessment of current estimated need and actual provision as well as any changes in provision during the “monitoring year”</p>	<p>Allocations will be made in DPD for requirements identified. CS policy has enabling role.</p>
CSP 7	<p>In the long term, changes in the employment structure, eg increase in service sector will be measured. Land</p>	<p>Record from census or other surveys changes in structure (ie employees in particular jobs, residents place of and type of employment).</p>	<p>Long term monitoring will inform CS reviews.</p> <p>Land and floorspace developed against CS targets.</p> <p>Employment by sector, measured on a longer term basis.</p>

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	<p>developed for employment purposes, will be recorded as will changes of use from employment. Where possible numbers employed will be recorded also extent of land developed. The implementation of tourism related development will also be monitored, to demonstrate the nature of the development that is being implemented and to enable it to be evaluated against any emerging criteria for sustainable tourism</p>	<p>New permissions and estimated numbers of jobs</p> <p>Tourist accommodation and attractions, with estimated numbers of jobs.</p>	
CSP 8	<p>number of facilities that are protected by the policy but which are lost through planning permissions being granted</p>	<p>Loss of facilities and any newly created.</p>	<p>Expectation is increased protection for rural facilities. Policy is permissive but cannot provide new.</p>
CSP 9	<p>loss of protected land, area and number of sites</p>	<p>Loss of sites by area or site</p> <p>New facilities/ sites provided by developer</p>	<p>Expectation is minimal loss of protected area(s) and provision of additional land for play and recreation in step with new development.</p>
CSP 10- 16	<p>monitor against delivery of development see table "Settlement hierarchy" before policy CSP16</p>	<p>See above, housing employment and services will be quantified</p>	<p>Outcomes for individual settlements will be explicitly monitored. See CSP 4 and 5 and note below.</p>

CSP 17	monitor policy and review indicators as necessary to ensure that monitoring process is itself effective and appropriate	Indicators to be reviewed and where possible improved to enable the impact and implementation of the CS and other DPDs to be monitored.	Monitoring process can be adapted as necessary to remain effective without changes to policy
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Note: The overall expectations in terms of the delivery of development of the CS are set out in table at 7.4, and these figures will form the basis for monitoring. In compiling the allocations DPD there will be an opportunity to ensure that the allocations match the requirements of the CS and make any necessary changes if they do not. The current situation is that the present allocations are appropriate for the needs of the CS but that minor changes and the identification of some additional sites probably within existing settlements may be needed. One major purpose of the allocations DPD is to ensure that the needs of the CS continue to be met by land identified, it will not change the CS policies themselves.

The degree of variation which will necessitate action will vary and delivery in some areas will in any event be front loaded (for example the implementation of the housing consents at Newent) or may involve one major scheme (eg a new retail store). The expectation is that the CS will deliver approximately in accord with the table 7.4, and that any major difference could reduce the effectiveness of the CS in achieving its aims. It will be reviewed on a regular basis and a first review is likely after the allocations DPD is in place. In assessing the need for review or amendment it is the disaggregated targets in 7.4 that will be used to assess whether the CS is likely to deliver. A major departure from the strategy, for example in the balance between the towns would require an early review, but smaller changes in distribution of say housing would not. The sensitivity of the strategy varies across the district so that for example an additional number of dwellings being built in Newent could have a greater effect on the strategy than the same change in say Cinderford. In terms of providing flexibility the expectation is that any adjustment in the overall numbers should preserve the strategy, so for example the percentage share of development between settlements is expected to be preserved should the numbers change.

In terms of the other aims and objectives, monitoring will be as described above. The contextual indicators will be more relevant to assessing the overall appropriateness of the CS and its policies will be assessed against these. A review for example may be needed in the event of a change in the expected population or a large variation in economic conditions.

It is much more difficult to monitor some parts of policies such as CSP 1 with its overall aim to improve the environment. It does this partly by requiring attention to design and partly by ensuring that development does not have certain adverse effects. The possible adverse effects can be monitored but should be minimal

because the policy is designed to ensure that they are avoided. The enhancement, the safeguarding of the landscape and the achievement of good design is very difficult to measure, except subjectively or by recording improvements achieved to development proposals and schemes not permitted.

CIL

2.27 The Council has not yet decided whether it will introduce a CIL, although discussions have taken place within the County, both before and after the SIDP (Strategic Infrastructure Development Plan) exercise that was proceeding under the co ordination of the County Council. It is likely that an infrastructure plan and a CIL scheme will be prepared, although its impact is likely to be seen on development yet to be committed rather than the large amount of new development which is covered by permissions currently awaiting or in the process of being implemented.

Sustainability monitoring

2.28 As part of the process of Sustainability Appraisal (SA), the effects or potential effects of the CS are assessed. These will continue to be monitored as the policies are implemented. This will enable changes to be made if needed.

2.29 Monitoring the effects of the CS will be undertaken by using the key indicators already identified in the SA framework (Appendix 4). These indicators will be reported on in the Annual Monitoring Report (AMR) of the Local Development Framework produced by the Council.

2.30 Monitoring from Appendix 4 of the SA

2.31 The objectives of the CS are assessed in the SA together with the relevant policies and indicators are identified. The following sustainability objectives which have been identified are those against which the effects of the CS should be monitored. The indicators which can be measured are listed alongside these objectives.

SA objective	Indicator(s)
1 improve health	Average life expectancy, % of people describing their health as not good
2 provide new housing to meet local needs	Provision of affordable housing units, earnings/ house price ratio, out commuting
3 diversify the range of employment within the district	“under investigation”, new workspace provided, occupations and place of work of residents.

4 reduce poverty and income inequality	Average income of residents/ employees in the district
5 meet local needs locally (workforce appropriate to local needs taking account of changes to employment structure)	% workforce with no or limited academic or vocational qualifications.
6 reduce vulnerability of the economy to climate change	Part under investigation- adaption/ offer of tourism opportunities may be part.
7 reduce need/ desire to travel by car	Level of out commuting by car, mode of travel to school,
8 Help everyone access basic services easily, safely and affordably	Mode of travel to school, ease of access to services
9 protect and enhance habitats and species	Condition of SSSIs from monitoring data, population monitoring of selected species
10 protect and enhance landscape/ townscape	Countryside quality counts indicator,
11 maintain and enhance cultural and heritage assets	Number and condition of Listed buildings (incl no at Risk)
12 reduce vulnerability to flooding/ sea level change	% properties at risk from flooding, no permitted in areas identified as at risk
13 reduce non-renewable energy consumption and greenhouse emissions	Installed low carbon energy projects,
14 reduce risks associated with unstable or contaminated land	Measure of land recorded as contaminated
15 conserve water resources and protect quality	Water use by area (not yet available), % main rivers classified as of good quality
16 minimise consumption/ extraction of minerals	Waste minimisation strategy, re-use of demolition materials on site etc
17 minimise pollution	Air quality monitoring and other eg water quality indicators.

Monitoring Conclusions

2.32 The additional information above demonstrates that there are various methods by which the CS can be monitored. They will principally be recorded in the AMR but some indicators will also be contained within the monitoring of the sustainability objectives. Some of the key indicators such as those relating to new houses built have been monitored for many years in detail and will continue to be. These provide trend data as published for example in the housing trajectory.

2.33 Improvements to the Councils recording of employment related development will enable improved monitoring in that area as will any further changes in the way in which development management activities are themselves recorded and monitored.

2.34 Monitoring will inform either the performance of individual policies or will provide information about the context within which the CS operates. Changes to the latter could require a general review of the CS whereas the former could simply require changes to the appropriate policy or even just a change in the way in which it is implemented.

2.35 With the wide range of items being monitored it is not possible to specify general rules for when the outcomes necessitate certain action. There is a further complication that some items change rapidly and can be monitored in the short term whilst others (eg employment structure) change much more slowly. Two main areas of monitoring are suggested for the CS, the first is related to the specific delivery of development and is itemised in the CS at 7.4. The second is the more general contextual area where the CS contributes to wider areas of change. Examples of these two areas are the number of dwellings built in Cinderford, and the installed renewable energy capacity.

2.36 Clearly a major unexpected variation in the monitoring results from that anticipated would require investigation. In practice the expectation of review is such that the CS will need to be reviewed in a few years time. This will happen at a point when there will be extensive results from the monitoring referred to above and it is suggested that the CS should not be amended until then. Any revisions to the plan making system will also be in place at that time.

