



The Plan for Stafford Borough Part 2

Examination Statement
– Issue 9 –
Development Management, Risks and
Monitoring

June 2016

Issue 9: Development Management, Risks and Monitoring

9.1 *Development Management: Should the Plan provide sufficient guidance to cover aspects of development management which are not explicitly covered in PSB1?*

- 9.1.1 The Council considers that the adopted Plan for Stafford Borough (P2-C3) (herein referred to as the adopted Plan), alongside the policies contained within Part 2 of the Plan for Stafford Borough (P2-A1) (herein referred to as Part 2), and together with the Neighbourhood Plans, provides sufficient guidance to cover all necessary aspects of development management. The Council does not consider that there are any changes to national policy since the Plan was adopted need to be addressed through Part 2 of the Plan for Stafford Borough. Nevertheless the Council will continue to monitor changes to national policy and make the necessary assessment through the Authority Monitoring Reports in the context of the Local Plan Review process.
- 9.1.2 As discussed in Issue 6, a representation has been made stating that a site specific policy is required for Trentham Gardens. However, the Council does not consider that this is required, because the existing policies contained within the adopted Plan namely Policy E2, E6, N8 and N9 are fully adequate to address, and support where appropriate new development at Trentham Estate.
- 9.1.3 Historic England has submitted a representation confirming that no additional policies are required beyond adopted Plan Policy N9.
- 9.1.4 A representation has been made which seeks amendment of the wording of adopted Plan Spatial Principle SP7 and Policy E5, requesting that these are amended to support the extension and alterations to non-residential buildings in the Green Belt to encourage rural sustainability. Such amendments are not appropriate or necessary in the context of national policy contained in the NPPF, and moreover, these are adopted policies which have already been found 'sound' by an Independent Inspector.

9.2 *Uncertainties and Risks: Overall, does the Plan take sufficient account of uncertainties and risks? How flexible is it?*

- 9.2.1 The policies within Part 2 (P2-A1) have been worded to deliver key components of the adopted Plan's policies (P2-C1) and take account of uncertainties and risks whilst providing sufficient flexibility for applicants and the ability to accommodate changes that may be imposed. Within the policies there is flexibility and room for negotiation, for example in Policy SB2 of Part

2 (P2-A1) there is provision to take into account site viability and market conditions in line with the adopted Plan (P2-C1) and the NPPF (P2-F1). Similarly, flexibility within Policy SB2 allows applicants to demonstrate if that the social and community facility is no longer required, or can be served in a different location within the settlement or has been actively marketed for 12 months for an alternative social or community use without success. In addition, many of the policies of the adopted Plan are criteria based policies that allow a high degree of flexibility. This is particularly the case with Policy SB3 which links to the criteria defined in Policies Stafford 1, 2, 3 & 4, Policies Stone 1 & 2 as well as Policy E2.

9.2.2 The Authority Monitoring Report (AMR) will be updated at the end of each financial year to evaluate how effective the policies have been in Part 2 and the adopted Plan, and to identify any extraneous reasons as to why the policies have been more or less successful. It will make recommendations for remedial action in future reviews of the Plan, or in its interpretation or implementation. Policies will be assessed against policy milestones, targets and indicators, set out in Appendix E of the adopted Plan (P2-C1), thus enabling early indications of issues that will need to be addressed. Where the Policy milestones within the Plan are not being met either through changed circumstances at local or national level, this will be assessed within the AMR. Where the AMR demonstrates that the policy objectives are not being delivered, contingency mechanisms may be undertaken as set out in Appendix E of the adopted Plan (P2-C1) to address barriers to the delivery of the Policy. Failing that, it may be necessary to review a Policy or how it is being implemented.

9.3 *Monitoring: Are the monitoring arrangements soundly based?*

9.3.1 The monitoring arrangements for Part 2 (P2-A1) is based on the adopted Plan's (P2-C1) monitoring framework within Appendix E, Chapter 20 which identifies indicators and targets to monitor the performance of each Policy within the Plan. The Framework of locally specific indicators includes what each Policy seeks to achieve, the information that will be monitored by the Council and other external bodies to monitor the progress achieved, and identifies suitable contingency measures in order to meet the policy outcomes of the Plan. The monitoring framework will be reported through the Authority Monitoring Reports, thus enabling a comparison over time to monitor the impacts and implementation of policies. The suite of locally specific indicators has been derived to enable comprehensive monitoring of the Plan and includes monitoring of policies within Part 2 (P2-A1).

9.3.2 On this basis the Council considers that Policies SB1, SB3 and RIE1 will be monitoring through the adopted Plan's monitoring framework. In particular Policy SB1 identifies the settlement boundaries, which will be established when

the Part 2 Plan is adopted. The monitoring of Spatial Principle 7 in terms of appropriate development relating to the settlement boundaries will take place through the consent of planning permissions within the Development Management process. Policy SB3 will be monitored through the adopted Plan's policies Stafford 1, 2, 3 & 4, Policies Stone 1 & 2 together with Policy E2 as detailed in the monitoring framework. Policy RIE 1 identifies the Recognised Industrial Estate boundaries, which will be established when the Part 2 Plan is adopted. The monitoring of Policy E3 in terms of appropriate development relating to Recognised Industrial Estates will take place through the consent of planning permissions within the Development Management process.

9.3.3 The Council considers that it is appropriate to add to the monitoring framework established in Part 1's Appendix E, in order to monitor Policy SB2 in terms of social and community facilities lost to other uses, as this particular indicator is not assessed through the monitoring framework in the adopted Plan (P2-C1). Accordingly Part 2 makes provision for this in para. 6.2 (Table 4). Therefore the Council considers that the monitoring arrangements are soundly based for Part 2 (P2-A1). The monitoring arrangements have been positively prepared and are effective in the context of the adopted Plan's monitoring framework to assess delivery of the policies. The monitoring arrangements were set out in the Publication version of Part 2 (P2-A1) in order to provide the opportunity for community engagement and alternatives to be suggested through representations, but none were received.

9.3.4 The National Planning Practice Guidance includes the following section on monitoring within ID 12-027-20140306 Last updated 06 03 2014 (P2-F2)

'What is the role of the Authority Monitoring Report?

Local planning authorities must publish information at least annually that shows progress with Local Plan preparation, reports any activity relating to the duty to cooperate and shows how the implementation of policies in the Local Plan is progressing and are encouraged to report as frequently as possible on planning matters to communities. This is important to enable communities and interested parties to be aware of progress. Local planning authorities can also use the Authority Monitoring Report to provide up-to-date information on the implementation of any neighbourhood plans that have been made, and to determine whether there is a need to undertake a partial or full review of the Local Plan. This information should be made available publicly. Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 _ (<http://www.legislation.gov.uk/uksi/2012/767/regulation/34/made>) sets out what information the reports should contain'.

9.3.5 Representations have been received stating that the Council has failed to monitor the adopted Plan (P2-C1). The Council produces an Authority Monitoring Report (previously called the Annual Monitoring Report) which sets out the performance of policies and progress towards targets and milestones in planning policy documents, the latest being the Authority Monitoring Report 2014-2015 produced in 2016 (P2-E1). The annual Land for New Homes provides an analysis of the provision of new dwellings within Stafford Borough. It identifies:

- the number of dwellings built so far in the current plan period;

- the number of dwellings under construction;
- the number of dwellings which could be built by virtue of having permission; and
- an analysis of completion / build rate by year, site size, site type, location and origin.

The latest Housing Monitoring Land for New Homes 2015 was published in June 2016 (P2 L19).