**Borough Council of King's Lynn and West Norfolk's Response to
the Issues and Questions raised by Inspector David Hogger
in relation to the
King's Lynn and West Norfolk Local Plan:
Site Allocations and Development Management Policies**

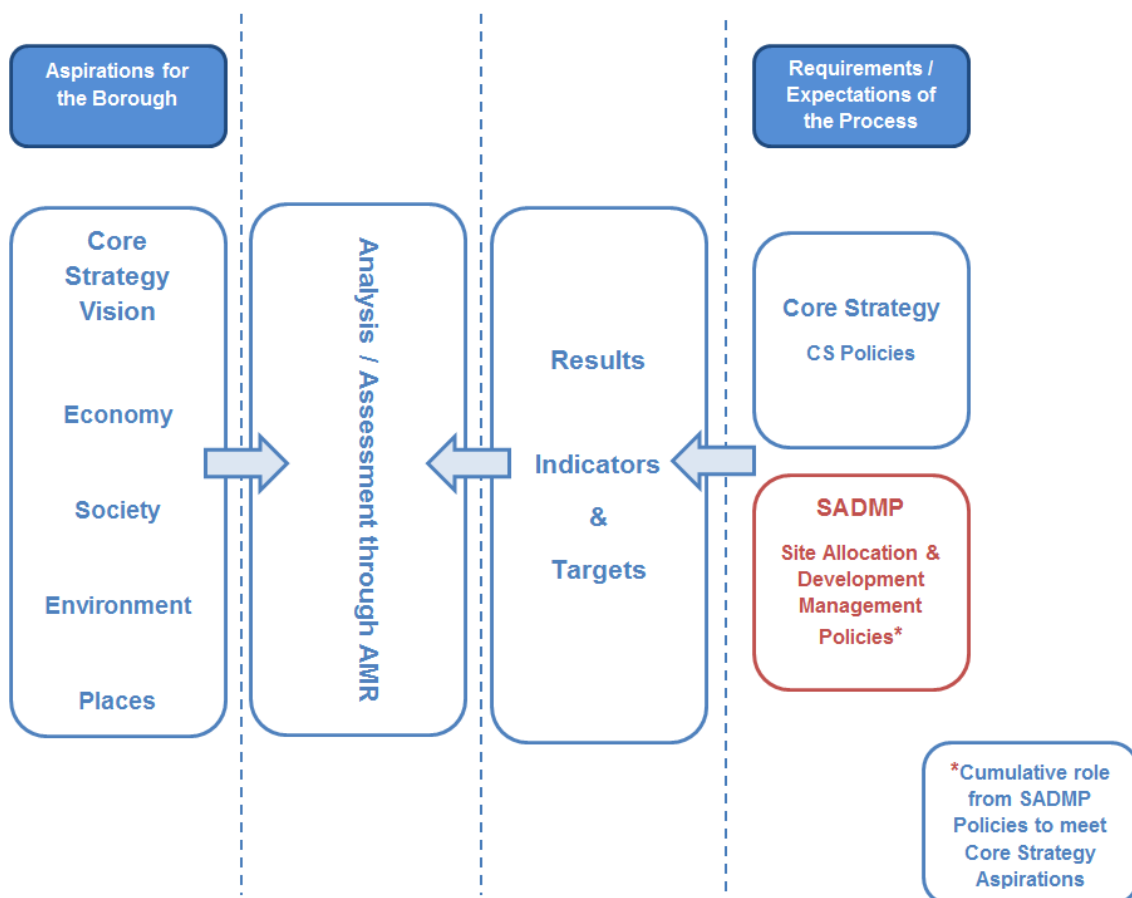# Issue 44: Implementation and Monitoring (Appendix 6)

**Examination
November 2015**

Table of abbreviations used with the Council's Statements

Abbreviation	Full Wording
AONB	Area of Outstanding Natural Beauty
BCKLWN	Borough Council of King's Lynn and West Norfolk
BDC	Breckland District Council
CLG	Communities and Local Government
CITB	Construction Industry Training Board
CS	Core Strategy
DM	Development Management
DPD	Development Plan Document
EA	Environment Agency
FDC	Fenland District Council
FRA	Flood Risk Assessment
GI	Green Infrastructure
GTANA	Gypsy and Traveller Accommodation Needs Assessment
ha	Hectare
HELAA	Housing and Economic Land Availability Assessment
HLF	Heritage Lottery Fund
HRA	Habitats Regulation Assessment
HSEHA	Health and Safety Executive Hazard Areas
IDB	Internal Drainage Board
KRSC	Key Rural Service Centres
KLATS	King's Lynn Area Transportation Strategy
LDS	Local Development Scheme
LLFA	Lead Local Flood Authority
LPSO	Local Plan Sustainability Objectives
NCC	Norfolk County Council
NE	Natural England
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
NORA	The Nar Ouse Regeneration Area
NWT	Norfolk Wildlife Trust
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
RV	Rural Village
RAF	Royal Air Force
RLA	Residential Land Assessment
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SADMP	Site Allocation and Development Management Policies Plan
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHMA	Strategic Housing Market Assessment
SHLAA	Strategic Housing Land Availability Assessment
SMP	Shoreline Management Plan
SPA	Special Protection Area
SSF	Site Sustainability Factors
SSSI	Site of Special Scientific Interest
SuDs	Sustainable Drainage systems
SVAH	Smaller Villages and Hamlets
SWMP	Surface Water Management Plan
THI	Townscape Heritage Initiative
UPC	Un -attributable Population Change

44.1 In order for the plan to be found sound it must be effective. In order to test its effectiveness over the course of the plan period it must be capable of appropriate monitoring. The monitoring section makes no reference to a Monitoring Report, the frequency of monitoring, any targets the Council hopes to achieve or what actions may be taken if the expected outcomes of the policies are not forthcoming. The second sentence of paragraph 6.1 refers to indicators that <u>could</u> be used. Should the Council's approach to monitoring be strengthened to ensure that the plan is effective and remains consistent with national policy?

1.1 Appendix 6 of the SADMP sets out the Council's approach to monitoring, and relates back to the Monitoring Framework in the Core Strategy. The Council has taken on board the queries raised by the Inspector in the question detailed above, and welcomes the opportunity to clarify our approach to monitoring the policies in the Plan.

2.1 The diagram above illustrates how our monitoring results (the indicators and targets) of the Local Plan policies will then be analysed against the Core Strategy Vision and Objectives. This will enable us to monitor the progress of the Plan against the aspirations for the borough, and therefore consider whether the policies are sufficiently effective to help meet these aspirations, or should / could they be reviewed.

3.1 It is suggested that the text below replaces the existing Appendix 6.

4.1 The revised format of the Framework below is an extension to our existing Monitoring Framework, and fits into our current approach to monitoring the Core Strategy policies. To date the Annual Monitoring Report has reported on policies by the Economy/ Community/ Environment themes, and then listed the Core Strategy policies within these. The SADMP policies will also now be included.

Proposed modification to text-

5.1 The text and table below replaces the existing Appendix 6 in the SADMP document.

Appendix 6 Monitoring Framework

6.1 Monitoring is crucial to the successful delivery of this document because it helps to identify the key challenges and opportunities, and enable adjustments and revisions to be made to the Plan if necessary. One of the tests of soundness of a DPD is whether there are clear mechanisms for implementation and monitoring. The council is therefore committed to the effective monitoring of the policies within this document, in particular to establish when interventions might be necessary to ensure timely delivery of what is proposed.

6.2 By identifying appropriate indicators and targets, the effectiveness of policies and proposals can be monitored. The results of such monitoring will then identify which policies and implementation measures are succeeding, and which need revising or replacing because they are not achieving the intended effect. The allocations in this document are intended to achieve the stated objectives of the Core Strategy and the purposes of monitoring are:
- to assess the extent to which policies and sites in the Site Allocations DPD are being implemented
- to identify policies or sites that may need to be amended or replaced

- to establish whether policies have had unintended consequences
- to establish whether assumptions and objectives behind policies are still relevant
- to establish whether targets are being achieved

6.3 Monitoring outcomes will normally be reported on an annual basis for a year which begins on 1 April and ends on 31 March, unless data is not available for such a time period. An Annual Monitoring Report is produced in December each year and this is the main record of monitoring information. The need to intervene, or otherwise, will be kept under regular review.

6.4 In addition, the Appropriate Assessment identified a number of mechanisms by which new development could impact on European Wildlife Sites and specified measures to ensure that any actual adverse effect is avoided. These include a Monitoring and Mitigation Strategy and Panel including RSPB, Natural England, Norfolk Wildlife Trust and others. The Council will publish further work on this matter.

6.5 The table overleaf shows the Framework for monitoring the SADMP policies. The purpose is to clarify how we will be able to regularly monitor the effectiveness of our site allocations, and our policies, against the wider borough visions and objectives set out in the Core Strategy. This table illustrates the linkages between the policies and provides the indicators we will use to monitor performance. This fits into our current approach to monitoring the Core Strategy policies.

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
DM1 Presumption in favour of Sustainable Development	Community	This policy sets out the overarching policy approach, and by the various elements of monitoring set out below we will be able to provide a commentary on how the Plan is working.		Annual Monitoring Report
DM2 Development Boundaries	Community	Amount of development outside development boundaries	Minimal consents in line with Core Strategy approach	Annual Monitoring Report
DM3 Infill development in Smaller Villages and Hamlets	Community	Net additional dwellings by location	Monitor contribution to overall housing supply	Annual Monitoring Report
DM4 Houses in Multiple Occupation	Community	To monitor the number and location of planning consents for HMOs	To identify any concentration of uses and work with Environmental Health/ Housing Standards to manage this	Annual Monitoring Report
DM5 Enlargement or Replacement of Dwellings in the countryside	Community	Reference made to frequency of use of policy in DM Committee Reports	Monitor any notable changes in locations/ numbers of enlargements/ replacements in the countryside.	Annual Monitoring Report
DM6 Housing Needs of Rural Workers	Community	To monitor the number and location of new planning consents for agricultural occupancy dwellings, and for the removal/ relaxation of agricultural	Monitor any notable changes in patterns of the build/ use of agricultural occupancy dwellings.	Annual Monitoring Report

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
		occupancy conditions.		
DM7 Residential Annexes	Community	Reference made to frequency of use of policy in DM Committee Reports	Monitor any notable changes in patterns/ numbers of annexes.	Annual Monitoring Report
DM8 Delivering Affordable Housing on Phased Development	Community	Affordable housing delivery (amount of and location) Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	To monitor the provision of affordable housing against the total amount of housing development. Also the location and type of affordable housing delivered, against current Council aspirations/ targets/ policy CS09.	Annual Monitoring Report
DM9 Community Facilities	Community	Consents given for community facilities Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	Ensure new open space is being provided with major new developments, and ensure this is in line with policy and infrastructure needs.	Annual Monitoring Report
DM10 Retail Development outside Town Centres	Economy	Take up of employment land by location and type of use, and where it is coming forward on previously developed land. Amount and type of completed employment floorspace (A1-A5 and total). Plus completed floorspace on PDL.	Monitor changes to the retail space in the borough, against the aims of CS policies (Policies for Places and CS09) and supporting the role of the town centre.	Annual Monitoring Report
DM11 Touring and Permanent Holiday Sites	Economy	Number and location of holiday lets granted consent	Ensure applications adhere to policy DM11, and monitor the numbers and locations of these.	Annual Monitoring Report
DM12 Strategic	Economy	Reference made to frequency of use of	Monitor effectiveness of policy DM12, and the amount of applications refused as a result, to	Annual Monitoring Report

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
Road Network		policy in DM Committee Reports	ensure the policy is protecting the Strategic Road Network.	
DM13 Disused Railway Trackbeds	Economy	Reference made to frequency of use of policy in DM Committee Reports	Monitor effectiveness of policy DM12 in restricting development on trackbeds.	Annual Monitoring Report
DM14 Development associated with CITB Bircham Newton and RAF Marham	Economy	Planning consents within land ownership, or associated with the businesses.	Ensure the Plan recognises and supports the role of larger employers in the borough, so these are able to strengthen and grow.	Annual Monitoring Report
DM15 Environment, Design and Amenity	Environment	This is an overarching DM policy, flagging up standards the Council uses regularly to guide/ determine applications		
DM16 Provision of Recreational Open Space for Residential Developments	Environment	Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	Ensure new open space is being provided with major new developments, and whether this is in line with policy standards.	Annual Monitoring Report
DM17 Parking provision in New Development	Environment	This is an overarching DM policy, flagging up standards the Council uses regularly to guide/ determine applications		
DM18 Coastal	Environment	Monitoring of Water Quality - Water Cycle	Minimise development in areas at risk from	Annual Monitoring Report

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
Flood Risk Hazard Zone		Study/ Blue Flag Awards Flood Risk - Number of developments located where they would be at risk of flooding.	flooding.	
DM19 Green Infrastructure	Environment	Green Infrastructure / Biodiversity – Monitoring to show losses or additions to biodiversity habitats.	Use of the Monitoring and Mitigation Strategy, Levy and Panel to monitor and manage green infrastructure in the borough to an acceptable standard.	Annual Monitoring Report. Monitoring through the Panel (annual)
DM20 Renewable Energy	Environment	Renewable Energy – To show the number of consents granted for renewable energy and the amount of generation by installed capacity and type.	Where appropriate to support renewable energy schemes in line with policy DM20.	Annual Monitoring Report
DM21 Sites in Areas of Flood Risk	Environment	Flood Risk - Number of developments located where they would be at risk of flooding.	Minimise development in areas at risk from flooding.	Annual Monitoring Report
DM22 Protection of Local Open Space	Environment	Reference made to frequency of use of policy in DM Committee Reports.	Monitor effectiveness of policy DM22 in protecting existing open space.	Annual Monitoring Report
For all Site Allocations (Housing and Employment) policies we intend to monitor the following-				
Housing	Community	Net additional dwellings by location (granted / commenced/ completed)	680-710 per year (cumulative average)	Annual Monitoring Report

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
		Net additional dwellings (cumulative) since 2001	Monitored against the housing trajectory	
		Supply of ready to develop housing sites (assessed annually)	At least 5 years housing land supply at any point in time.	
		Likely future levels of housing delivery (taking into account the previous years performance)	Monitored against the housing trajectory	
		No of gross new dwellings on previously developed land	Maximise use of previously developed land	
		Housing completions showing bedroom numbers	Provide an indication of housing types/ sizes built across the borough.	
		Number of Gypsy and Traveller pitches	At least 5 years housing land supply at any point in time. Monitored against the housing trajectory.	
		Affordable housing delivery (amount of and location) Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	Ensure affordable housing is delivered in line with CS09, to meet the identified needs of the borough.	
		Number of housing completions for – New Builds Conversions	Provide an indication of the range of residential development granted consent.	

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
		Change of Use Other Multiple Demolitions		
Economy	Economy	Supply of land developed for employment use	Deliver at least 66 hectares from 2010 to 2025	Annual Monitoring Report
		Remaining allocated land	Monitor land allocated and available for employment development	
		Number of years of employment land supply available at current take-up rate	At least 5 years worth	
		Take up of employment land by location and type of use. Completed employment floorspace and type of use.	Increase the amount / use of employment land across borough in line with Council aspirations.	
		Amount and type of employment land and floorspace coming forward on previously developed land	Maximise use of previously developed land	
		Number and location of holiday lets granted consent	Ensure applications adhere to policies DM11 and DM18, and monitor the numbers and locations of these.	
Environment	Environment	Monitoring of Air Quality Management Areas	Air Quality Action Plan	Annual Monitoring Report / Monitoring

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
				through the Panel (annual)
		Monitoring of Water Quality	Water Cycle Study/ Blue Flag Awards	
		Flood Risk - Number of developments located where they would be at risk of flooding.	Minimise development in areas at risk from flooding.	
		Conservation of the Built Environment – Number of heritage assets and conservation areas; number of buildings at risk; and conservation area character appraisals.	Preserve and enhance the historic environment.	
		Green Infrastructure / Biodiversity – Monitoring to show losses or additions to biodiversity habitats.	Use of the Monitoring and Mitigation Strategy, Levy and Panel to monitor and manage green infrastructure in the borough to an acceptable standard.	
		Renewable Energy – To show the number of consents granted for renewable energy and the amount of generation by installed capacity and type.	Where appropriate to support renewable energy schemes in line with policy DM20.	