

Matter 12 Monitoring and Implementation

Issue 12 – Is the Plan deliverable, capable of being effectively monitored and is it viable?

1. The Plan, at paragraph 7.12 states that a monitoring framework will be prepared to assess the performance of the Plan for the plan period. Has this been produced and if not when will this be made available?

12.1.1 The monitoring framework has not been produced to date. The Council is happy to prepare a monitoring framework through the modifications process.

2. What are the key indicators and targets proposed to be in the monitoring framework and how will the Council ensure that these effectively measure and monitor progress on delivery of the Plan's policies? What actions will be taken if targets/policies are not being achieved?

12.2.1 The key targets and indicators include:

- Sustainable construction standards achieved, operation of carbon offset fund, number of renewable energy permissions – to be reported quarterly through current 2030 Strategy monitoring.
- Delivery of the development strategy through monitoring delivery of allocated sites, analysis of windfall rates and appeal statistics relating to the implementation of core policies through development management – housing and employment supply monitored annually, appeal statistics reported through internal Strategic Planning Advisory Board quarterly
- Housing and traveller accommodation supply requirements, housing mix, affordable housing provision / adapted housing standards / self and custom build proportions – housing completions are monitored annually.
- Employment land supply requirements, losses from employment / protection of key employment sites – employment completions and losses are monitored annually.
- Tourism trends (annual spend, bedspaces) – regularly monitored by tourism partnerships and Council's tourism service.
- Green infrastructure standards - Monitoring of progress against Infrastructure Delivery Plan, periodic review of provision through District study, working with partners.
- Vitality and viability of town centres, measured through footfall and vacancy indicators – a mix of annual monitoring and town centre studies.
- Infrastructure – Monitoring of progress against Infrastructure Delivery Plan, use of CIL strategic fund – through current annual Infrastructure Funding Statement and in the future through Infrastructure Funding Strategy.
- The implementation of design principles monitored through appeal statistics reported through internal Strategic Planning Advisory Board quarterly.
- A range of ecological indicators are monitored by the local Nature Partnership and biodiversity net gain implementation will be subject to regular reporting by Council and partners.

[Type here]

- Delivery of SAC/SPA mitigation strategy measures and periodic visitor surveys undertaken by on-going delivery groups.

12.2.2 The Council's Planning Strategy service currently prepares annual monitoring reports on housing and employment provision. Major policy issues are reported to a quarterly Strategic Planning Advisory Board which reports to the Council's Environment Committee. The Council as a whole has a quarterly performance monitoring framework which reports on progress, through the relevant committee, with the delivery of the Council Plan and the 2030 Strategy. A Regeneration and Investment Board also considers regular highlight reports on the delivery of a pipeline of regeneration sites (including Local Plan allocations and sites on the Brownfield Register). Once the SDLP is adopted, it is proposed to include a range of Local Plan indicators and targets in the Council's performance monitoring framework, to be reported through Environment Committee and the Regeneration and Investment Board.

12.2.3 An analysis of the reasons for any shortfall or non-implementation of key targets and indicators will determine the response. For example, a failure to enforce standards will require reviewing development management or other delivery procedures and may require the preparation of practice notes/guidance to assist with policy interpretation and delivery. Issues with viability or barriers to delivery may require more proactive measures such as making bids for grant funding, working with promoters to remove barriers and/or working with the District Valuer to ensure a flexible response towards planning obligations. Persistent non-delivery or the emergence of new challenges and trends will require a review of policy approach and wording through a Local Plan review to improve effectiveness.

3. Are the glossary terms set out in Appendix E of the Plan consistent with national policy?

12.3.1 The Council considers that the Glossary terms set out in Appendix E are accurate and consistent with national policy. The Council is happy to consider any factual updates or clarifications needed in response to any other required changes to the SDLP.

4. Overall, is the Plan viable?

12.4.1 The Council considers that the SDLP is viable. The Viability testing has been an iterative process through the plan-making process. The Local Plan Viability Assessment 2022 Refresh Report (EB111, August 2022) is the most recent of a series of reports prepared for the Council and specifically updates the Draft Local Plan Viability Assessment (EB70, May 2021) refreshing the main inputs and assumptions. In particular, it contains an assessment of the effect of the policies in the draft SDLP, in relation to the potential development sites to be allocated and the updated strategic infrastructure and mitigation costs.

12.4.2 The 2022 Viability Assessment is prepared in line with the requirements of the NPPF and the PPG. It follows the Harman Guidance and is in conformity with the appropriate RICS Guidance (HDH is a firm regulated by the RICS). A

[Type here]

technical consultation to inform the Viability Assessment was undertaken during June and July 2020. Representatives of the main developers, development site landowners, 'call for site' landowners, their agents, planning agents and consultants working in the area and housing providers were invited to comment on an early draft of this report. The comments made were carried forward into the 2022 Viability Assessment.

- 12.4.3 The Viability Assessment is based on the EUV Plus methodology set out in the PPG (Paragraph 10-013-20190509). Appraisals were prepared for a set of typologies (as per Paragraph 10-004-20190509 of the PPG) that are representative of future development in the District. In addition, site specific appraisals were run for the Strategic Sites (as per Paragraph 10-005-20180724 of the PPG). Values and costs assumptions were derived based on published sources of data and local market research. The estimated costs of strategic infrastructure and mitigation for the strategic sites (as derived by ARUP for the IDP (EB69 and EB110) and AECOM for the Transport Funding and Delivery Plan (EB109) were incorporated into the appraisals. The costs of the various policies under consideration were tested.
- 12.4.4 The output of the appraisal is the Residual Value. The Residual Value is the maximum amount a developer can pay for a parcel of land and make a return (or profit). For a site to be viable the Residual Value must exceed the Benchmark Land Value. The BLV is the Existing Use Value plus a return for the landowner.
- 12.4.5 The report concluded that the Stroud District Council area has a vibrant and active property market, although some areas, particularly those associated with the wider Stroud Valleys, do have challenges. All types of residential and non-residential development are coming forward and only in relatively few cases they are not delivering the full policy requirements for affordable housing in addition to the adopted rates of CIL.
- 12.4.6 The 2022 Viability Assessment reported that since the 2021 Viability Assessment was undertaken, residential values have increased by about 15% and build costs by about 10%. There have been a number of national requirements that have been mandated (although some were factored into the 2021 Assessment) including the requirements for 10% Biodiversity Net Gain, EV Charging and the move towards zero carbon through the Future Homes Standard.
- 12.4.7 It was reported that the Policy requirements at the levels proposed in the Draft Plan, generally allows for developer contributions (in addition to the current rates for CIL) of at least £5,000 per unit, and in many cases, significantly more. In taking this approach it remains necessary to be cautious about relying on the brownfield sites to in the early years of the Plan, and the Council should only count on such sites (for example in the five-year land supply calculation) where it is confident the site will be forthcoming, for example where there is a recent planning consent.
- 12.4.8 In relation to the Strategic Sites, the 2022 Viability Assessment noted that there is no doubt that the delivery of any large site is challenging, so it is

[Type here]

recommended that the Council continues to engage with the sites' promoters in line with the advice set out in the Harman Guidance and the PPG.

- 12.4.9 Whilst some of the non-residential uses are not viable, they are not rendered unviable by the cumulative impact of the Council's policies, rather by the general market conditions. The employment uses (office and industrial) are coming forward.