

LONDON BOROUGH OF RICHMOND UPON THAMES
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
WRITTEN STATEMENT

MAIN MATTER 22:
IMPLEMENTATION, DELIVERY AND MONITORING
(POLICY 55)

WEDNESDAY 10 JULY 2024

COUNCIL RESPONSES TO MAIN MATTER 22

Document version: 06/06/2024

Abbreviations

AMR – Authority Monitoring Report

GLA – Greater London Authority

IDP – Infrastructure Delivery Plan

LBRuT – London Borough of Richmond upon Thames

NPPF – National Planning Policy Framework

PLD – Planning London Datahub

RLP – Richmond Local Plan

22. Will the Council’s monitoring and review processes for the RLP be effective in assessing the success or failure of delivery and what alternatives might reasonably be provided if necessary?

The Council has a well-established monitoring framework and comprehensive set of monitoring indicators that provides a consistent approach that allows comparison over previous years to assess trends. The Council captures considerably more data than is required by the Planning London Datahub (PLD). The Council’s monitoring reports are published online¹ as a series of topics, the timescale of which is determined by the nature of the topic in terms of its strategic importance and sensitive to changing circumstance. Further information about how the Local Plan Monitoring Framework (SD-018) has developed and how it conforms with regulations, can be found in the Appendix of the document.

The Local Plan Monitoring Framework (SD-018) outlines how the Council will monitor the Local Plan’s success in meeting the challenges and opportunities set out in the Vision and Strategic Objectives (Section 3 of the RLP (SD-001)), the policies themselves and the ten themes informing the vision and growth in LBRuT. It is a comprehensive framework which includes both indicators and targets where possible, as set out in Table 1 of SD-018. The indicators and targets will assess the effectiveness of policies and how the implementation of policies is progressing. The monitoring framework includes significant effects indicators which form part of the Sustainability Appraisal (SD-002 and SD-050) process and are envisaged to be monitored primarily through Authority Monitoring Reports (AMRs). The monitoring framework is also the means of monitoring the implementation of the Ham & Petersham Neighbourhood Plan (SD-029). The West London Waste Plan (SD-030) includes its own set of indicators.

The framework, whilst it sits alongside the RLP, was produced as a standalone document as it is an overall framework, which also relates to other plans and monitoring programmes (e.g. it monitors the effectiveness of the adopted Ham and Petersham Neighbourhood Plan). This approach will allow the Council to regularly review the framework independently, so there is flexibility to adapt to changes in monitoring requirements, which can be required over the lifetime of a Plan.

Overall, this framework sets out a realistic and meaningful way of monitoring the effectiveness of the RLP, taking account of availability of data, practicalities of monitoring arrangements such as resources available within the Council, and it is flexible as it allows for

¹ Authority Monitoring Reports are available at www.richmond.gov.uk/authority_monitoring_report

inclusion / review of targets when relevant. The arrangements for monitoring the delivery of the RLP are clear and will be effective.

In addition, a London Plan Annual Monitoring Report² is published which assesses the effectiveness of the London Plan policies, which the policies of the RLP are in general conformity with. The London Plan Annual Monitoring Report is informed by the GLA's PLD which uses data supplied by the boroughs to monitor planning permissions and completions. This provides good quality data on key indicators, allowing for comparison between boroughs, including for housing, employment, transport, environment and heritage. The GLA also produce other specialist monitoring reports, such as on Energy Monitoring and Carbon Offset Funds Reports³.

This regular monitoring provides an important source of evidence which would act as one of the signals to suggest where a policy (or policies) is not effective. Other sources of information include Infrastructure Delivery Plan (SD-069 and SD-70) reviews and appeal decisions. As the Council is committed to regularly reviewing and monitoring the indicators in line with the framework, whereby key policies / aspects are monitored annually, it is considered that this establishes an appropriate time period for assessing the policies' effectiveness.

Given the nature and characteristics of LBRuT and its Site Allocations as well as general patterns of development, there are no delivery elements with critical timing in the Plan, for example there is no critical key infrastructure project that is needed to be delivered up front to enable certain development sites to progress. The RLP is considered sufficiently clear to show what is intended to happen in the area over the lifetime of the Plan, where and when this will occur and how it will be delivered. Monitoring on an ongoing and regular basis, without milestones and with key areas reported on annually, is therefore considered appropriate in LBRuT.

As set out in paragraph 26.26 of the RLP (SD-001), the NPPF allows for Local Plans to be reviewed in whole or in part to respond flexibly to changing circumstances. Therefore, external factors such as changes in national policy, a London Plan review or changes in local evidence and need may trigger a review of the RLP. The Council's response to Main Matter 2 and question 2.2 in relation to the plan period, further discusses circumstances

² The London Plan Annual Monitoring Reports are available at www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/monitoring-london-plan

³ GLA Energy Monitoring Reports are available at www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/energy-monitoring-reports

where there may be a review of the Local Plan. The programme for the preparation of Development Plan Documents is set out within the Council's Local Development Scheme (SD-025), which is regularly reviewed and updated. For example, the recent LDS sets out that the review of the West London Waste Plan has commenced. The Government's plan-making reforms in the future are expected to set out timescales for preparing and adopting a plan.

Policy 55 'Delivery and Monitoring' is a new policy in the RLP, to outline the approach to delivery through partnership working, securing planning obligations, and enforcement and monitoring. It addresses the implementation of the Plan, drawing out details in the supporting text and to reflect the Infrastructure Delivery Plan (SD-069 and SD-70).

A number of comments on the Publication (Regulation 19) Local Plan raised specific matters related to infrastructure, implementation, monitoring and enforcement. The Council considers Policy 55 provides an appropriate framework for delivery and monitoring, allowing for site-specific assessments of proposals to ensure planning obligations contribute to mitigating the impacts of new development, and these representations (Rep No.s 555, 556, 557, 558, 559, 561, and 563) are addressed in the Schedule of responses to the Publication Local Plan (Regulation 19) consultation (in plan order) with the Council's response (January 2024) (SD-014).

A modification is proposed to the supporting text of Policy 55 in response to representations received on behalf of the National Gas / National Grid Electricity Transmission (Rep No.s 423 and 424, set out in SD-014), which suggest a reference is added to Policy 28 respecting existing site constraints including utilities, which the Council felt would be more appropriate to reference in relation to infrastructure delivery. See the Schedule of Proposed Modifications suggested by the Council (LBR-002), or Table 1 below.

Table 1: Proposed Modifications

Details taken from the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002).

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
P55.1	National Gas / National Grid Electricity Transmission (comments 423/424)	378	Policy 55 Delivery and Monitoring, Paragraph 26.18	Include reference to site constraints including existing utilities: 26.18 The IDP therefore ensures that all infrastructure matters necessary for the achievement of the Local Plan Vision and Spatial Strategy as well as the placebased strategies, policies and site-specific proposals are embraced. All new infrastructure should be to high design and sustainability standards, as set out in other policies in the Plan, for example taking into account existing site constraints including utilities situated within sites, and seeking a creative approach to new development around utilities assets.