



**Brighton & Hove
City Council**

**Proposed Submission City Plan Part 2
Brighton & Hove Development Plan April
2020**

Hearing Session: 16 November 2021 (AM)

**Statement in Response to Matter 18:
Monitoring & Review**

**BY
BRIGHTON & HOVE CITY COUNCIL**

List of Abbreviations

AMR - Authority Monitoring Report
BHCC – Brighton & Hove City Council
CPP1 - City Plan Part 1
CPP2 – City Plan Part 2
HDAP – Housing Delivery Action Plan
LDS – Local Development Scheme
NPPF - National Planning Policy Framework
PPG – Planning Policy Guidance
TECC – Tourism, Equalities, Communities & Culture Committee

Matter 18 Monitoring and Review

Whether the Plan would be able to be monitored effectively to ensure timely delivery of its proposals in conformity with the City Plan Part 1?

Issue 1 Monitoring

Q.1. How would the implementation of the Plan policies be achieved? What mechanisms are there to assist development sites to progress?

1. City Plan Part One Annexe 1 Implementation and Monitoring (CD02) sets out the key monitoring indicators and targets and identifies how the City Plan will be implemented. The CPP2 is accompanied by the Proposed CPP2 Implementation and Monitoring Targets document (SD04). It is proposed that these monitoring targets will be included in an updated Annexe 1 (CD02) to the CPP1 which will be updated by way of an addendum following adoption of the CPP2.
2. The implementation of the plan will primarily be achieved through the Development Management process via the determination of planning applications for development. The majority of planned development is likely to be delivered by the market, but some will be delivered by public bodies including BHCC. Annual monitoring of the policies will be undertaken through the AMR to ensure that the objectives and targets within the Plan are met.
3. For each policy in the CPP2, SD04 identifies:
 - which CPP1 strategic objectives the policy will help deliver;
 - the relevant implementation / issue(s) relating to the policy;
 - the key delivery mechanisms/partners required in implementing the policy;
 - the relevant policy indicators and how they will be measured;
 - targets which will be used to measure progress and success in implementing the policy;
 - timescales for achieving the targets and monitoring the indicators; and
 - specific triggers and actions, showing what will be done where targets are not being achieved.
4. For certain policy areas, the existing CPP1 monitoring targets are sufficient. Where targets are set, care was taken to ensure that they are proportionate, measurable and data is available.
5. To assist the progress of development sites and to meet the requirements of the NPPF/PPG, BHCC has published a Housing Delivery Action Plan (HDAP) (ED16) which provides an overview of

housing delivery in the city, assesses the main barriers and constraints to housing delivery, and sets out actions which the Council is undertaking to help assist and improve delivery in the future. The Council's actions and responses set out HDAP Section 8 include:

- accelerating the direct delivery of affordable housing through the New Homes for Neighbourhoods programme and Joint Venture partnership with Hyde Housing (Homes for Brighton & Hove);
 - partnership working to accelerate delivery unlock stalled sites, including through the One Public Estate programme;
 - improving communication with housing providers through an Affordable Housing Delivery Partnership and a Planning Agents Forum (PAF); and
 - improvements to the Council Planning service (e.g. encouraging pre-application discussions and Planning Performance Agreements).
6. The housing land supply position will continue to be monitored and assessed through annual reviews of the SHLAA, alongside annual reports in the AMR.
 7. In terms of the housing allocations identified in CPP2 policies, good progress has already been made by developers and landowners in bringing some of the sites forward as outlined in BHCC05 'Updated planning status of CPP2 Site Allocations'. Planning applications have already been submitted and / or approved on some sites. The Council will continue to actively monitor progress on all allocations and seek feedback from landowners and developers when updating the SHLAA and any further updates to the HDAP as to whether there are any blockages or delays to delivery. As set out above, the Council also regularly meets with the PAF agent's forum where issues affecting delivery in the city are discussed.
 8. BHCC annually reviews the housing trajectory which is included in the SHLAA and AMR. This reflects ongoing dialogue with landowners and developers to understand the delivery situation on individual sites. This enables the Council to monitor the available housing land supply and would enable them to bring forward sites.

Q.2. How would the implementation of the Plan be monitored? Would it be effective? How would the results of monitoring be acted upon? What would trigger a review of the Plan?

9. As described above, SD04 sets out a comprehensive framework for how implementation of the plan will be monitored. A range of indicators and measures are identified to test the relative performance of the CPP2 policies. These indicators will be reported annually and analysed as part of the Council's AMR.

10. It is considered that the indicators and measures outlined in SD04 would be effective in monitoring the implementation of the Plan. Triggers and actions are identified which detail how the results of monitoring will be acted upon.
11. LPAs are required to undertake an assessment review of DPDs at least once every five years to ensure that policies remain relevant and effective. CPP1 was adopted five years ago in March 2016 and an assessment review process has been undertaken indicating that some policies require review. The council has programmed detailed to commence the CPP1 review late 2021 / early 2022 as set out in the LDS and which was endorsed by council members of the TECC committee in March 2021¹.

Q.3 Overall does the Plan deal adequately with uncertainty?

12. The council considers that, so far as is reasonably and practicably possible, the Plan deals adequately with uncertainty. The CPP1 sets out a strategic planning framework for the period to 2030 based on relevant and proportionate evidence, public consultation, and due process in accordance with the relevant guidance and legislation. The role for CPP2 is to assist in the implementation and delivery of that strategy through additional site allocations and detailed development management policies. Again, the Plan has been prepared in accordance with all legal and procedural requirements, relevant national planning guidance and is based upon robust evidence and public consultation.
13. As detailed in responses to the questions above, a robust monitoring framework has been set out which will indicate the progress of the plans implementation and will help to indicate changing circumstances and the need for relevant actions including plan review.
14. The Plan needs to strike a balance between giving sufficient clarity and certainty for applicants / decision makers to know what is required for a proposal to be acceptable and the need for some flexibility to respond to changing circumstance and to encourage innovation. It is the council's view that, where relevant, CPP2 policies have achieved that balance.
15. Where practicable to do so, main modifications have been suggested to address significant changes introduced by government during the preparation of the Plan. These include changes to the Use Class Order specifically the introduction of the Use Class E which could not have been anticipated at the start of the process and some changes to reflect the latest revision to the NPPF.

¹ <https://present.brighton-hove.gov.uk/documents/g9993/Public%20reports%20pack%2011th-Mar-2021%2016.00%20Tourism%20Equalities%20Communities%20Culture%20Committee.pdf?T=10>

16. See also Council response to Matter 2, Issue 1, Question 4.