KNOWSLEY LOCAL PLAN: CORE STRATEGY

KNOWSLEY METROPOLITAN BOROUGH COUNCIL

HEARING STATEMENT 11

Matter 11 IMPLEMENTATION AND MONITORING

Issue: Whether the KLPCS is sufficiently proactive and effective to ensure timely delivery of its proposals and associated infrastructure.

Questions

- 11.1 Is the KLPCS positively prepared and effective having regard to its limited approach to the implementation of objectives/policies and the monitoring of delivery? Are the delivery mechanisms identified in the KLPCS sufficiently specific and targeted to meaningfully assist achievement of the plan's objectives?
- 11.1.1 The approach of the KLPCS to the implementation of its objectives and policies is set out in various parts of the Plan and its supporting documents. A box listing the key delivery mechanisms is included after each policy. The Monitoring Framework (SD15) sets out the range of indicators and where applicable targets that will be used to monitor achievement of each Strategic Objective of the KLPCS.
- 11.1.2 To provide further clarity, Appendix 1 to this statement provides information related to delivery on a policy-by-policy basis. A separate "policy delivery table" is included which indicates (for each policy):
 - The most important mechanisms by which each policy will be delivered;
 - The indicators and (where applicable) targets that will be used to assess the success of each policy;
 - The key risk factors that the Council has identified which could (unless mitigated) have threatened the deliverability of each policy;
 - Any measures which have been included in the KLPCS and its evidence base to mitigate the risk;
 - Any "trigger mechanisms" which the Council propose to use following adoption of the KLPCS to assess whether remedial action is needed to address any issues concerning the deliverability of each policy; and
 - The remedial actions that will be available to the Council if the policy is not being delivered effectively.
- 11.1.3 The delivery mechanisms identified in row 2 of each of the "policy delivery tables" in Appendix 1) to this statement are drawn in part from the "delivery mechanisms" boxes under each policy within the KLPCS. They are also drawn in the case of some of the policies from the supporting text in the KLPCS for example where there are active regeneration programmes,

- relevant proposals in related plans and strategies, or evidence of clear commitment by public or private sector organisations to deliver key schemes.
- 11.1.5 The indicators and targets in rows 3 and 4 of each "policy delivery table" in Appendix 1 are drawn primarily from the Monitoring Framework (SD15) but are also supplemented where necessary by information from within the KLPCS itself. The most important indicators are the Core Indicators (paragraph 2.2.1, page 4 (SD15)). Where a specific policy will play a primary role in delivery of a Core Indicator as defined in the Monitoring Framework the indicator and targets are shown in bold in appendix 1.
- 11.1.6 The key risk factors, mitigation measures, trigger mechanisms and potential remedial measures in rows 5, 6, 7 and 8 of each "policy delivery table" in Appendix 1 are drawn in part from information which is presented elsewhere in the KLPCS and its evidence base.
- 11.1.7 As the information in Appendix 1 is drawn primarily from the submitted documents the Council considers these to be sound in terms of their overall approach. However the Council would be happy to consider adding a further appendix to the KLPCS to be based on the approach to monitoring delivery of each policy summarised in Appendix 1 to this statement. This would be likely to constitute a main modification and would aid the clarity of the Plan.
- 11.2 Does the Monitoring Framework (SD15) provide a robust and effective mechanism for measuring the timely delivery of the objectives and policies of the KLPCS? Does it readily enable assessment of performance against the *policies* of the plan?
- 11.2.1 The Monitoring Framework (SD15) identifies the strategic objectives and policies of the KLPCS to which each indicator is linked. It will therefore help the Council to assess performance against each policy of the KLPCS. The Monitoring Framework as a whole is presented in terms of achievement of the Strategic Objectives. Appendix 1 to this statement reorders the information presented in the Framework on a policy by policy basis and supplements this with further information drawn from the KLPCS itself and other sources. As mentioned in relation to question 11.1 above the Council is happy to consider adding a further appendix based on this information to the KLPCS.
- 11.3 In determining the Monitoring Indicators, has regard been paid to SMART objectives (specific, measurable, attainable, relevant and timebound)? What is the point of monitoring indicators which do not have a measurable target?
- 11.3.1 The indicators in the Monitoring Framework (SD15) are split into: 17 Core Indicators; 43 Intermediate Indicators; and 55 Contextual Indicators. As explained in the Monitoring Framework (paragraph 2.2.1, page 4 (SD15)) the Core Indicators are the most important as they measure the achievement of policy actions. The Core Indicators also provide a basis for identifying trigger mechanisms to determine when remedial action is required to address under-

- delivery. Further information concerning the trigger mechanisms and remedial actions available for each policy is set out in Appendix 1 to this statement.
- 11.3.2 Paragraph 2.2.1 of the Monitoring Framework (SD15) also explains the role of Intermediate and Contextual Indicators, the latter of which provide useful background data in understanding wider trends and influences that may not be directly governed by the Plan itself.
- 11.3.3 In defining the indicators the Council has paid regard to SMART objectives. It accepts that not all the indicators (particularly the Contextual ones) meet all the SMART criteria i.e. they are not all "specific", "measurable", "attainable", "relevant" and "time-bound". However, the crucial test in assessing the effectiveness of the Plan as a whole is that each Strategic Objective and if possible each policy should have one or more SMART measures attributed to it. This approach will enable performance as a whole to be assessed. Appendix A to the Monitoring Framework and Appendix 1 to this statement between them establish that all of the KLPCS Strategic Objectives and most of its policies have at least one SMART indicator attributed to them.
- 11.3.4 The inclusion of additional contextual indicators in the Monitoring Framework beyond those which are strictly necessary to measure core outputs of the Plan will in the Council's view (even for indicators which are not considered SMART) help to monitor the economic, social and environmental well being of the Borough on an on-going basis. This will in turn help contribute to the future evidence base e.g. for when the Council prepares subsequent stages or a future review of the Plan. This also links with the corporate monitoring activities across the Council, strengthening the relationship between the Local Plan and other plans and programmes operational in Knowsley.
- 11.3.5 The Council also intends to maintain some flexibility in the specific indicators which are used in future years. This is to take account for example of new data sources becoming available to measure specific outcomes.
- 11.4 Does the KLPCS identify the remedial actions to be taken if policies are not being successfully implemented? Is there guidance about the stages at which remedial actions would be triggered?
- 11.4.1 Appendix 1 to this statement provides information relating to performance against monitoring indicators and any remedial action to be taken as appropriate.
- 11.4.2 As explained in the Council's Statement on Matter 2, the policies of the KLPCS are flexible to account for a range of changing circumstances over the plan period. In the case of a number of the policies the proposed remedial actions in the event of significant failure to deliver include a potential review of the KLPCS. Notwithstanding that the Plan as submitted is considered to be sound the Council would be happy to consider inserting a further commitment (e.g. as a modification to paragraph 1.44 of the KLPCS) to undertake such a review if a number of the policies are not being implemented successfully or if circumstances change to render the KLPCS out of date. The key mechanism

for assessing whether such a review is needed at any one time will be through the Council's Monitoring Report. This could be linked particularly to the 16 core indicators in the Monitoring Framework as these are the most important measures against which successful delivery of objectives will be assessed.

<u>Infrastructure Delivery Plan</u>

- 11.5 Is the Infrastructure & Delivery Plan (IDP) soundly based and effective?

 Does it identify the key elements of infrastructure which are crucial for the delivery of the strategy? Is it appropriate for policy CS 27 to require compliance with an IDP which is independent of the KLPCS and subject to future change? Are the requirements of policy CS 27 proportionate to the nature and scale of development and capable of flexible interpretation, as sought by national policy?
- 11.5.1 The Infrastructure Delivery Plan (SD06) prepared to support the KLPCS is soundly based and effective. The IDP has been prepared over several years to support different stages of plan development. The first iteration was published alongside the Core Strategy Preferred Options Report in June 2011 (SD06a), with a refined final version published in support of the Proposed Submission Document in November 2012. The preparation of the IDP has followed key principles of plan preparation regarding the use of evidence and the value of stakeholder engagement. Infrastructure providers have not raised any objections to the process by which the IDP has been prepared or its content. It has also been prepared in accordance with paragraph 162 of the NPPF, and guidance issued by the Planning Advisory Service entitled "Steps Approach to Infrastructure Planning". It is intended that the IDP will be used to guide the investment plans and decisions of infrastructure providers, stakeholders and developers and in the development management process.
- 11.5.2 The IDP presents a detailed audit of infrastructure in Knowsley as at 2012, using a wide definition of "infrastructure". It describes existing infrastructure and forthcoming projects and programmes which will deliver infrastructure in the Borough. It sets out the broad impacts of each policy area of the KLPCS on infrastructure matters (figure 5.3, pages 83-90 (SD06)). The Annexes of the IDP list the infrastructure projects expected to be delivered up to 2028 (Annex 1, pages 109-122 (SD06)) and discuss the infrastructure implications arising from the implementation of each of the KLPCS policies, in terms of standards to be achieved and specific projects to be delivered (Annex 2, pages 123-139 (SD06)). The IDP therefore identifies all infrastructure considered critical to the delivery of the spatial strategy.
- 11.5.3 Policy CS27 (clauses 1 and 2) require new development to support infrastructure and demonstrate that any negative impacts on provision of infrastructure in Knowsley can be avoided or mitigated. The IDP will be used to monitor existing infrastructure in Knowsley and any potential shortfalls which may be exacerbated by the impacts of new development (policy CS27 clause 3). The IDP has been presented as a separate document to the KLPCS to reflect national guidance that infrastructure planning should allow for a reflexive relationship between Local Plans and the investment plans and

strategies of infrastructure providers. This approach will allow for regular review and updating of the IDP in consultation with stakeholders and the public. It will enable the IDP to account for any new projects or infrastructure priorities which emerge over the plan period. The Local Plan Monitoring Report process (Indicator MI 115) will provide annual updates regarding progress in delivery of projects identified in the Infrastructure Priority List.

11.5.4 To confirm that the IDP will be updated in consultation with stakeholders and members of the public, the Council is happy to consider an additional modification to the supporting text of policy CS27, as follows.

Potential Additional Modification*

Amend paragraph 10.9 to read:

"[...] Therefore the Knowsley IDP will be subject to regular review and will be updated with new projects and priorities as appropriate, throughout the plan period. Such updates will be carried out in consultation with stakeholders and proposed revisions subject to public consultation. The latest version of the Knowsley IDP is available on the Council's website".

11.5.5 Requiring developers to have regard to the IDP (and its subsequent iterations) will help promote an up-to-date understanding of infrastructure provision and needs in Knowsley. It will also help ensure the infrastructure needs of new development are considered from the outset, bearing in mind the wide definition attributed to the term (as set out in KLPCS Table 10.1). Policy CS27 is flexible to ensure that developers can focus on the infrastructure issues pertinent to their proposed developments, and submit this information with planning applications. In the Council's view, it should be up to the developer to demonstrate that their approach to this issue is proportionate and appropriate to the development being proposed. However, the Council accepts that this could be clarified by slightly amending clause 3 of policy CS27. The Council would be content to consider the following modification.

Potential Main Modification*

Amend policy CS 27 clause 3 to read:

"Proposals for new development must have regard to and demonstrate compliance with the Knowsley Infrastructure Development Plan, insofar as this is appropriate to the scale and nature of the development".

11.6 Does the IDP fully reflect the findings of the Economic Viability
Assessment (EVA - EB06), which identified certain locations/types of
development that face serious viability problems? Will policy CS 27
result in restrictions on the amount, location or type of development
coming forward?

- 11.6.1 Sections 6.12 to 6.14 and the conclusions of the latest IDP (pages 102-105 (SD06)) account for the findings of the Economic Viability Assessment (EVA) (EB06) which was published in 2012.
- 11.6.2 The IDP recognises that viability is challenging for some types of development in Knowsley, meaning that requirements for developer contributions must not be set at a level which would place the viability of new development at risk. In some areas of Knowsley, this is likely to mean that the funding available from the implementation of developer contributions policies for infrastructure provision is likely to be limited. Reflecting this, the IDP recognises that there needs to be greater consideration of the appropriateness of the use of different developer contribution tools in Knowsley, in particular the Community Infrastructure Levy (CIL), which if set is a non-negotiable charge. The IDP notes (paragraph 6.14.1, page 104 (SD06)) that policies should recognise the marginal position with regard to viability for some developments and hence their lack of ability to contribute significantly to infrastructure provision. However, this process must also recognise the potential for those developments which do have significant "headroom" viability to contribute substantially to infrastructure provision.
- 11.6.3 Flexibility is an essential part of the approach in the KLPCS. Policy CS27 of the KLPCS (in particular clause 6) ensures that requirements for certain developer contributions are framed within a caveat of flexibility, which means that the Council would be willing to accept reduced contributions if it is proven that viability would be detrimentally affected. The IDP (paragraph 6.14.3, page 105 (SD06)) reiterates this key principle.
- 11.6.4 In the Council's view, policy CS27 should not result in any restrictions on the amount, location or type of development coming forward over the plan period. Policy CS27 clause 3 is proposed to be modified to ensure that requirements for compliance with the IDP are realistic in relation to the scale and nature of each development. Policy CS27 clause 6 provides flexibility to ensure that all developer contributions subject to legal agreements can be subject to negotiation in relation to impacts on economic viability where justified on viability grounds.
- 11.7 The EVA recommended a hierarchy of policy requirements, has this been adequately reflected in the KLPCS? Does KLPCS paragraph 10.11 mean that the requirements of the policies listed are all non-negotiable? In situations where the full range of policy requirements is not viable, how will the competing demands for infrastructure, building design, sustainable development, affordable housing and so on be reconciled? Why doesn't the KLPCS give strategic guidance on prioritisation?
- 11.7.1 As noted in response to question 11.6, the EVA indicates that some development circumstances in Knowsley are challenging in terms of viability. Not all of the policy requirements set out in the KLPCS will be able to be delivered for all developments without viability being affected. As recommended in the EVA (Section 9.5-9.7, pages 250-259 (EB06)) the

KLPCS therefore incorporates flexibility in its approach to this issue including a tailored approach to different policy requirements.

- 11.7.2 The Council does not intend to use the list of policies in paragraph 10.11 of the KLPCS as a list of policies with non-negotiable requirements. They are collated in order to aid understanding regarding the range of policies to be considered in relation to developer contributions, but requirements are subject to the different wording of each listed policy. A summary of the requirements is given below (drawing on the EVA evidence as interpreted in the KLPCS and other Council statements):
 - The transport requirements in policy CS7 are needed to deliver safe, accessible developments. These will mostly be considered to be mandatory and hence not normally be subject to negotiation on viability grounds. The potential modification to clause 2e of policy CS 7 (see Council response to question 10.1, Statement 10) will however confirm that requirements to include new technologies will be subject to a feasibility caveat.
 - The 25% affordable housing provision as stated in policy CS 15 is subject to potential relaxation provided that convincing evidence of detrimental impacts on development viability is provided. This takes account of the EVA evidence regarding the relative expense of providing affordable housing in comparison to other policy requirements.
 - The requirements of policy CS17 (regarding housing design) and policy CS19 (related to more general design matters) do not contain any caveats allowing relaxations to be made based on viability evidence. These represent in broad terms a continuation of existing policy and according to the EVA can be incorporated with minimal cost. The Council is however (for reasons set out in its Statement 9) happy to consider modifying policy CS17 to state that Building for Life and Lifetime Homes standards are "encouraged" rather than "required". This reflects their potential impact on development viability and the lack of evidence to justify their inclusion as a mandatory requirement. The design criteria in policy CS19 clauses 1 and 3 do not contain any explicit clause stating that they can be relaxed on viability grounds although these criteria are mainly framed in ways which provide some flexibility in how they are implemented in practice.
 - The design sustainability requirements set in policy CS22 (e.g. related to Code for Sustainable Homes and BREEAM) are affected by the Government's proposed revisions to the Building Regulations, which will be mandatory except where relaxations are permitted via the Allowable Solutions route. Council Hearing Statement 9 (HS09) sets out the Council's approach to this issue including some modifications to Policies CS17 and CS22.
 - The requirements concerning greenspace provision, enhancement and maintenance in policy CS21 (clauses 7 and 8) will (due to the linkage with policy CS27 which is made clear in policy CS21) be subject to clauses allowing reduction in requirements, but only if justified on viability grounds, apart from circumstances where such requirements are otherwise incorporated within a CIL charge.

- 11.7.3 The Council has therefore indicated its priorities by incorporating viability caveats in selected KLPCS policies. The overall viability caveat in policy CS27 will bring flexibility for other items to be secured through developer contributions. Future Local Plan and supplementary documents will provide further guidance on the hierarchy of policy requirements and mechanisms by which developer contributions will be collected. This will reflect EVA evidence and the tools appropriate to collect different types of contributions e.g. Section 106 agreements or CIL charges. The KLPCS policies provide sufficient strategic guidance on which to base this more detailed guidance.
- 11.7.4 The Council would be happy to consider adding to the supporting text of Policy CS27 as set out below to clarify that it intends to provide more detailed advice regarding these matters.

Potential Additional Modification*

Amend paragraph 10.12 to read:

- "[...] The Council expects that these requirements will be negotiated between the Council and the developer through the planning application process, having regard to the relevant legal and regulatory tests. The Council will also issue guidance regarding prioritisation between different developer contributions in a subsequent Local Plan document or Supplementary Planning Document".
- 11.8 Is the requirement for developers to pay for the independent scrutiny of viability evidence (clause 6 of policy CS 27) justified, particularly in circumstances where the EVA demonstrates that development is not viable?
- 11.8.1 The KLPCS incorporates a flexible approach (in accordance with the NPPF paragraph 173) to ensure that developer contributions sought by the Council do not affect viability to an extent to which development may be placed at risk.
- 11.8.2 The EVA uses representative typologies to give a general overview of viability at the plan level. It does not provide sufficient detail to account for the site specific circumstances of each potential development which may come forward up to 2028. The application of hypothetical EVA scenarios as the sole method of determining the viability of individual development proposals would therefore be inappropriate. Specific evidence covering the particular costs and values of individual development proposals will be needed to fully understand their viability. This viability evidence will need to be up-to-date and it would be inappropriate to continue to rely on the EVA findings (which are 2012-based) over the plan period.
- 11.8.3 A development-specific viability assessment must therefore be undertaken when any relaxation of developer contributions on viability grounds is sought for new development proposals. This comprehensive evidence must set out the clear rationale as to why meeting the required level of developer

- contributions would place development at risk, based on detailed investigation of the costs and values taking account of market conditions.
- 11.8.4 The evidence referred to above must be made available by the developer notwithstanding any issues of commercial confidentiality which may preclude an "open book" approach. The information may in some cases need to be scrutinised by independent experts on behalf of the Council. This is to enable its accuracy and robustness to be assessed and given appropriate weight in the decision-making process (for example by the Council in determining planning applications). This approach will identify the extent to which viability is a significant issue and hence the extent to which the level of developer contributions can be justifiably reduced.
- 11.8.5 Policy CS27 clause 6 and paragraph 10.19 seek to place the burden of funding this independent scrutiny on behalf of the Council on to the applicant. A similar approach has been taken in other authorities, whose Local Plan Core Strategies have been found to be sound (e.g. neighbouring St.Helens Council's Core Strategy, Policy CH2 (LC21)). The rationale for this was that developers will be required to submit viability evidence in any case, the Council will want to scrutinise this, and it may ease the process of negotiation if an agreed independent consultant is appointed by the Council from the outset to assess the viability evidence. The Council considers that the requirement to pay for this scrutiny is a reasonable requirement rather than the Council itself being expected to meet these costs. However, the Council is willing to consider any evidence which shows that this requirement would place an unreasonable additional financial burden on a potential development once it has reached the planning application stage, albeit potentially of relatively small size when considered against other development costs. Therefore, the Council is willing to consider a modification to policy CS27 and its supporting text, to remove this specific funding requirement, as follows.

Potential Main Modification*

Amend policy CS27 clause 6 to read

"[...] must be undertaken objectively and transparently. The developer will also be required to provide funds for the independent scrutiny of any viability evidence submitted to the Council. Further guidance will also be available [...]".

Potential Additional Modification*

Amend paragraph 10.19 to read:

"[...] accounting for site specific circumstances and costs. The Council will scrutinise any evidence submitted, but will require developers to fund this scrutiny, which must be undertaken independently, objectively and transparently. The Council intends to[...]".

*Note regarding modifications process

The suggested potential modifications to the KLPCS set out in this statement are put forward to assist the consideration of this matter at the hearing sessions. These and any other potential modifications would need to be approved by the Council's Cabinet and undergo formal public consultation before being considered for inclusion in any version of the KLPCS which is finally adopted.

Appendix 1: Core Strategy Policy Delivery Mechanisms

| POLICY OF KLPCS | SD1 Sustainable Development |
|-----------------------------------|---|
| PRIMARY DELIVERY MECHANISMS | Development management process Influence on other policies, plans and procedures |
| MONITORING INDICATORS (MI) | 111, 112 |
| TARGETS | National and local targets for applications determined in 8/13 weeks (MI 111) |
| KEY RISKS | Decision making risks on planning applications Policy not reflected in other plans and policies |
| MITIGATION | Transparent policy approach to inform decision making Account for all Local Plan policies in subsequently prepared documents |
| TRIGGERS FOR REMEDIAL ACTION | Significant decision making delays and/or high rates of appeals being upheld |
| POTENTIAL REMEDIAL ACTIONS | Review of development management processes and resources |

| POLICY OF KLPCS | CS1 Spatial Strategy for Knowsley |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Cross cutting policy – see other CS policies |
| MONITORING INDICATORS (MI) | 1, 4, 18, 21, 23, 38, 39, 41, 44, 49, 54, 64, 65, 67, 69, 70 , 97, 106, 113 |
| TARGETS | Cross cutting policy – see targets for other CS policies |
| KEY RISKS | The rate of development delivery continues to be lower than targeted due to a slow recovery from recession (see policies CS3, CS4 and CS6) Regeneration of the Principal Regeneration Areas is not delivered or only partially delivered (see policies CS9 - CS14) Delays in provision of strategic infrastructure |
| MITIGATION | See policies stated in key risks for specific triggers. Engagement with key infrastructure providers in the development of the KLPCS and the Infrastructure Delivery Plan |
| TRIGGERS FOR REMEDIAL ACTION | See information on policies stated in "key risks" section above for specific triggers. |
| POTENTIAL REMEDIAL ACTIONS | Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support. Potential review of Plan Release of Green Belt land as housing or employment supply as required (see policy CS5) |

| POLICY OF KLPCS | CS2 Development Principles |
|-----------------------------------|---|
| PRIMARY DELIVERY MECHANISMS | Site allocation and development management processes. |
| MONITORING INDICATORS (MI) | 7, 8, 9, 14, 38, 39, 64, 65, 66, 67, 68, 69, 70, 73, 74, 78, 82, 83, 86, 93, 94, 97, 98, 99, 100, 101, 102, 103, 104, 106, 107, 108, 109, 110, 112, 115 |
| TARGETS | Cross cutting policy – see targets for other CS policies |
| KEY RISKS | Site allocations and development management decisions need to be based on a balanced assessment of the principles set out in this policy |
| MITIGATION | Site allocations process will be carefully evidenced to ensure that it takes account of the principles set out here. Development management decisions will take account of any of the principles which are relevant to the specific decision |
| TRIGGERS FOR REMEDIAL ACTION | High rates of appeals being upheld based on specific principles which are set out. |
| POTENTIAL REMEDIAL ACTIONS | Review of development management processes including weight given to specific principles in decisions. |

| POLICY OF KLPCS | CS3 Housing Supply, Delivery and Distribution |
|-----------------------------------|---|
| PRIMARY DELIVERY MECHANISMS | Delivery of sufficient quantum will be managed via phasing mechanism – see policy CS3 (clause 3) and CS5. Reporting in SHLAA or Monitoring Report. Investment in private sector and Registered Provider housing (e.g. current Affordable Housing Programme) Site allocation and development management processes. Partnership working on residential-led regeneration programmes e.g. North Huyton, Tower Hill |
| MONITORING INDICATORS (MI) | 18, 19, 20 , 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 70 , 106 |
| TARGETS | An average of 450 net dwelling completions per annum between 2010/11 and 2027/28 (MI 19 and MI 20) At least 2250 dwellings deliverable within 5 years (with NPPF buffer) (MI 30 and MI 31) Decreases in empty homes, choice based letting demands, persons registered as homeless and households in fuel poverty (MI 26, 34, 35 and 37) Increase in empty homes brought back into use (MI 27) % new dwellings accessible by public transport, cycle and walking etc. in accordance with the "Ensuring a Choice of Travel" SPD/LTP (MI 70) |
| KEY RISKS | Economic trends Viability Developer / landowner intentions Land availability assessment Completion rates not meeting required levels over a sustained period, resulting in an overall housing shortfall, and housing need (including affordable housing need) increasing to unsustainable levels. Residents moving out of Knowsley to access appropriate housing elsewhere with knock-on effects such as longer commuting patterns and more traffic, decline in the local economy, and in extreme cases homelessness. |
| MITIGATION | Buffer or "headroom" of housing development opportunities provided 20% risk applied to SHLAA sites Engagement with landowners e.g. call for sites exercises Comprehensive assessment of viability of housing land supply – see Housing Position Statement Viability caveats included in policies CS15 and CS27 |

| POLICY OF KLPCS | CS3 Housing Supply, Delivery and Distribution |
|----------------------------------|---|
| TRIGGERS FOR REMEDIAL ACTION | Persistent and significant under delivery e.g. over a five year period Failure to provide deliverable supply at any one time for 2,250 dwellings plus flexibility as required by NPPF para. 47 |
| POTENTIAL REMEDIAL ACTIONS | Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support Review of viability evidence Release of Green Belt land as housing supply (see policy CS5) Potential review of Plan |

| POLICY OF KLPCS | CS4 Economy and Employment |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Delivery of sufficient quantum of land will be managed via phasing mechanism – see policy CS4 (clause 4) and CS5. Employment-led Regeneration programmes e.g. Knowsley Industrial and Business Parks Economic Regeneration Strategy implementation Education, employment and skills programmes Access to work assisted by transport schemes e.g. Local Sustainable Transport Fund |
| MONITORING INDICATORS (MI) | 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 32, 54, 55, 102, 103, 104, 106 |
| TARGETS | 10.2 hectares land developed for employment uses per annum (MI 1 and MI 3) At least 51 hectares land deliverable in five years at any one time (MI 4 and MI 5) Increase in numbers and density of businesses, jobs, residents in employment, household income, educational attainment (MI 7, 8,9, 12, 14, 102 and 103) Decrease in numbers of residents on out of work benefits, poverty levels, 16-18 year olds not in education, employment or training (MI 15, 16, 101, 104 and 105) |
| KEY RISKS | Economic trends Viability Developer / landowner intentions Land / premises availability assessment NPPF paragraphs 22 and 51 pose a risk to this policy if development does not come forward in the short / medium term or if an over-riding local need for housing arises Completion rates do not meet required levels, resulting in an overall employment shortfall reducing the economic growth and competitiveness of Knowsley. |
| MITIGATION | Buffer of employment sites being provided Engagement with landowners, e.g. call for sites exercises Spatial distribution of land supply for employment purposes is located in areas of proven developer interest for these purposes or accords with evidenced requirements Viability caveats included in policy CS27 |
| TRIGGERS FOR REMEDIAL ACTION | Persistent and significant under delivery e.g. over a five year period Failure to provide 51 hectare deliverable supply or adequate range of sites as defined in policy CS4 (clause 4) |

| POLICY OF KLPCS | CS4 Economy and Employment |
|----------------------------------|---|
| POTENTIAL REMEDIAL ACTIONS | Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support Release of Green Belt land as employment land supply (see policy CS5) Potential review of Plan |

| POLICY OF KLPCS | CS5 Green Belt |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Phasing of site release linked to policies CS3 and 4 – see above Detailed boundaries set in site allocations process Development management process Monitoring and evidence collation |
| MONITORING INDICATORS (MI) | 4, 5, 6, 30, 31 , 32 |
| TARGETS | At least 51 hectares employment land deliverable in five years at any one time (MI 4 and MI 5) At least 2250 dwellings deliverable within 5 years (with NPPF buffer)(MI 30 and MI 31) |
| KEY RISKS | Need to minimise impact of Green Belt release on regeneration objectives Risks identified in relation to housing / employment land availability – see above |
| MITIGATION | Identification of specific land supply and phasing requirements – policies CS3 and CS4 Progression of allocations via the Local Plan: Site Allocations and Development Policies Regular monitoring and updating of evidence in relation to land supply |
| TRIGGERS FOR REMEDIAL ACTION | Performance and available land supply assessed according to triggers in policies CS3 and CS4 |
| POTENTIAL REMEDIAL ACTIONS | Phased release of Green Belt land for residential and employment development Potential to vary the balance of use(s) in some "reserve" locations (as identified in paragraph 5.50 of the KLPCS) via the Local Plan: Site Allocations and Development Policies Release of 'safeguarded' Green Belt land prior to 2028 |

| POLICY OF KLPCS | CS6 Town Centres and Retail Strategy |
|-----------------------------------|---|
| PRIMARY DELIVERY MECHANISMS | Site allocation and development management processes Current planning permission and proven developer interest for major development in Kirkby town centre Lower levels of investment in other centres to be delivered via mainly private sector led investment Monitoring and review of evidence |
| MONITORING INDICATORS (MI) | 49 , 50,51, 54 , 55, 56, 57, 58, 106 |
| TARGETS | Indicative distribution and phasing of comparison retail provision – see tables 5.3 and 5.4 of KLPCS (MI49, MI54 and MI55) Indicative distribution of convenience retail provision –see table 5.5 of the KLPCS (MI49, MI54 and MI55) Decrease in levels of vacant retail units in centres (MI 56) Increase in retail expenditure retention and footfall in town centres (MI 51, 57 and 58) |
| KEY RISKS | Economic trends Viability Developer / landowner intentions Completion rates never meet required levels, resulting in an overall shortfall in the quantity and range of retail and service provision in Knowsley's town centres thereby undermining their performance in meeting local needs. No alternative to locate significant retail development in Knowsley other than in town centres, whilst appropriately addressing local needs. |
| MITIGATION | Comprehensive engagement with developers / landowners Site deliverability / viability issues have influenced distribution of capacity proposed |
| TRIGGERS FOR REMEDIAL ACTION | Persistent and significant under delivery of retail development, e.g. over a five year period relative to MI49, MI54 and MI55 Persistent poor performance against MI56 e.g. over a five year period |
| POTENTIAL REMEDIAL ACTIONS | Identification of reasons for under delivery and targeted action to address these, e.g. release of public sector assets, land assembly, public sector funding support Potential review of Plan |

| POLICY OF KLPCS | CS7 Transport Networks |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Range of funding programmes available e.g. connected to Local Transport Plan to assist delivery of clauses 1 and 3 Clause 2 and 4 of policy to be primarily delivered via development management and developer contributions processes Other policies, procedures and plans |
| MONITORING INDICATORS (MI) | 64, 65, 66, 67, 68, 69, 70, 82, 83, 106, 108, 110, 113, 115 |
| TARGETS | Delivery of transport schemes in Knowsley etc. in accordance with the LTP (MI 64) % new dwellings accessible by public transport, cycle and walking etc. in accordance with the "Ensuring a Choice of Travel" SPD/LTP (MI 70) Maintain number of Air Quality Management Areas at zero (MI 82) Decrease in transport emissions, number of noise complaints and number of people killed/seriously injured in traffic accidents (MI 83 and MI 110) Delivery of major infrastructure schemes as set out in the Infrastructure Delivery Plan (MI 115) |
| KEY RISKS | Funding of transport schemes where this has not already been committed Ability to access capital funding to deliver larger infrastructure projects Withdrawal of existing services could worsen accessibility by sustainable modes of travel Economic conditions and market-led nature of some public transport provision |
| MITIGATION | Joint working on monitoring of Local Plan, LTP and IDP Submission of funding bids as required Local strategies for community transport |
| TRIGGERS FOR REMEDIAL ACTION | Non delivery of major infrastructure required to facilitate the delivery of the strategy Persistent and significant poor or declining performance against target indicators |
| POTENTIAL REMEDIAL ACTIONS | Targeted action to support infrastructure delivery e.g. release of public sector assets, land assembly, public sector funding support Potential review of Plan Regular monitoring and review of evidence |

| POLICY OF KLPCS | CS8 Green Infrastructure |
|-----------------------------------|---|
| PRIMARY DELIVERY MECHANISMS | Site allocation and development management processes. Public sector investment to support the priorities within the Knowsley Green Space Strategy, Liverpool City Region Green Infrastructure Framework and Mersey Forest Plan, as supported by evidence in the Greenspace Audit and Playing Pitch Assessment and Strategy. Assistance from funding for sustainable transport schemes e.g. Local Sustainable Transport Fund Developer contributions |
| MONITORING INDICATORS (MI) | 64, 65, 75, 76, 84, 86,87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 106, 108, 109 |
| TARGETS | Delivery of transport schemes in Knowsley etc. in accordance with the LTP (MI 64) Increase river water quality and resident satisfaction with parks (MI 84 and MI 90) Performance against quantitative standards set in tables 8.1 and 8.2 of KLPCS (MI86 and MI87) Maintain or increase percentage of open space considered to be of good excellent quality etc. (MI 88) |
| KEY RISKS | Variable provision across the Borough Funding availability where this has not already been committed. Pressure from development needs for housing and employment upon environmental and ecologically sensitive sites. Reduced public sector resources available to deliver priorities. |
| MITIGATION | Partnership working and consistency of priorities with Knowsley Greenspaces Strategy and Playing Pitch Assessment, Knowsley Green Space Strategy, Liverpool City Region Green Infrastructure Framework and Mersey Forest Plan to address specific areas of weakness, deficits and shortfalls Submission of funding bids as required Continue to liaise with sites owners to encourage greater management of ecologically important areas. Preparation of additional Local Plan documents and supplementary guidance. |

| POLICY OF KLPCS | CS8 Green Infrastructure |
|----------------------------------|---|
| TRIGGERS FOR REMEDIAL ACTION | Persistent poor or declining performance against target indicators (MI86, MI87 and MI88). Future Greenspace Audit or Playing Pitch Assessment could potentially find revisions to standards needed |
| POTENTIAL REMEDIAL ACTIONS | Targeted improvements to be included as investment priorities in the review of Knowsley's Green Space Strategy. Future review of standards through review of Local Plan. |

| POLICY OF KLPCS | CS9 Principal Regeneration Area – North Huyton and Stockbridge Village |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Site allocation, master planning and development management processes Current planning permission and proven developer interest demonstrated by ongoing development Public and private sector investment Developer contributions |
| MONITORING INDICATORS (MI) | 19 , 30, 40, 41 , 42, 43, 50 |
| TARGETS | Policy sets out guidance on mix of development in this area to include at least 1,450 dwellings (see paragraph 6.12 of KLPCS) Contribution to achieving annual housing targets in MI19, and identification of housing land supply in MI30. |
| KEY RISKS | Economic trends Viability Developer / landowner intentions Non-delivery of housing development as the catalyst to meeting wider regeneration and development needs, including for affordable housing |
| MITIGATION | Potential transfer or release of remaining public sector assets Comprehensive engagement with developers / landowners Flexibility for changes in layout, density and capacity relative to existing commitment, including further master planning Viability caveats included in policy CS27 |
| TRIGGERS FOR REMEDIAL ACTION | Evidence of links to persistent and significant under delivery and under performance e.g. over a five year period, against MI49, MI54 and MI55. |
| POTENTIAL REMEDIAL ACTIONS | Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support Potential review of policy approach within Local Plan: Site Allocations and Development Policies Provision of additional policy guidance within updated Supplementary Planning Document Release of Green Belt land as housing land supply (see policy CS5) Potential review of Plan |

| POLICY OF KLPCS | CS10 Principal Regeneration Area – Kirkby Town Centre |
|-----------------------------------|---|
| PRIMARY DELIVERY MECHANISMS | Site allocation and development management processes Current planning permission and proven developer interest for major development in Kirkby town centre Public and private sector investment. Developer contributions |
| MONITORING INDICATORS (MI) | 4 , 40, 49 , 50, 51, 54 , 55, 56 57, 58 |
| TARGETS | Policy sets out guidance on mix of development in this area Indicative amount and phasing of new comparison retail floorspace to be as set out in tables 5.3 and 5.4 of the KLPCS Indicative amount of new convenience retail floorspace to be as set out in table 5.5 of the KLPCS Increased retail expenditure retention and footfall (MI 51 and 57) Proportion of vacant retail units within Kirkby Town Centre (MI56) |
| KEY RISKS | Economic trends Viability Developer/ landowner intentions Non-delivery of retail development as the catalyst to meeting wider regeneration needs There is no alternative for large scale retail investment in Kirkby, or to locate such a town centre development elsewhere in the Borough |
| MITIGATION | Comprehensive engagement with developers / landowners Site deliverability / viability issues have influenced distribution of development Flexibility for alternative approaches to the existing commitment if required Viability caveats included in policy CS27 |
| TRIGGERS FOR REMEDIAL ACTION | Evidence of links to persistent and significant under delivery of retail e.g. over a five year period, against MI49, MI54 and MI55. Persistent poor performance of Kirkby Town Centre against MI56. |

| POLICY OF KLPCS | CS10 Principal Regeneration Area – Kirkby Town Centre |
|----------------------------------|---|
| POTENTIAL REMEDIAL ACTIONS | Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support. Potential review of policy approach within Local Plan: Site Allocations and Development Policies Provision of additional policy guidance within Supplementary Planning Document Potential review of Plan |

| POLICY OF KLPCS | CS11 Principal Regeneration Area: Knowsley Industrial and Business Parks |
|-----------------------------------|---|
| PRIMARY DELIVERY MECHANISMS | Site allocations and development management processes Current planning permission and proven developer interest demonstrated by historic and ongoing development Public and private sector investment Developer contributions and Local Development Orders |
| MONITORING INDICATORS (MI) | 1, 3, 4 , 40, 44, 45, 46, 47, 48, 50, 79, 80, 81 |
| TARGETS | Policy sets out guidance on mix of development in this area and priorities for employment development. Contribution to achieving annual employment targets in MI 1 and MI 3. |
| KEY RISKS | Economic trends Viability Developer/ landowner intentions Land/premises availability assessment |
| MITIGATION | Buffer of employment sites being provided Engagement with landowners e.g. call for sites exercises Viability caveats included in policy CS27 |
| TRIGGERS FOR REMEDIAL ACTION | Evidence of links to persistent and significant under delivery and under performance e.g. over a five year period, against MI 1, MI 3 relative to MI44 and MI46. |
| POTENTIAL REMEDIAL ACTIONS | Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support Potential review of policy approach within Local Plan: Site Allocations and Development Policies Provision of additional policy guidance within Supplementary Planning Document Release of Green Belt land as employment land supply (see policy CS5) Potential review of Plan |

| POLICY OF KLPCS | CS12 Principal Regeneration Area – Tower Hill |
|-----------------------------------|---|
| PRIMARY DELIVERY MECHANISMS | Council's land disposal programme Site allocation, master planning and development management processes Public and private sector investment. Developer contributions. |
| MONITORING INDICATORS (MI) | 4, 19 , 40, 41, 42, 43, 49 , 50 |
| TARGETS | Policy sets out guidance on mix of development in this area which is to include at least 300 dwellings (see paragraph 6.35 of KLPCS) Contribution to achieving annual housing targets in MI19, and identification of housing land supply in MI30. |
| KEY RISKS | Economic trends Viability Developer / landowner intentions |
| MITIGATION | Ongoing release of public sector assets Comprehensive engagement with potential developers Flexibility for layout, density and capacity relative to further master planning Viability caveats included in policy CS27 |
| TRIGGERS FOR REMEDIAL ACTION | Evidence of links to persistent and significant under delivery and under performance e.g. over a five year period, against MI49, MI54 and MI55. |
| POTENTIAL REMEDIAL ACTIONS | Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support. Potential review of policy approach within Local Plan: Site Allocations and Development Policies Provision of additional policy guidance within updated Supplementary Planning Document Release of Green Belt land as housing land supply (see policy CS5) Potential review of Plan |

| POLICY OF KLPCS | CS13 Principal Regeneration Area – South Prescot |
|-----------------------------------|---|
| PRIMARY DELIVERY MECHANISMS | Site allocation, master planning and development management processes Current planning permission and proven interest for development in South Prescot. Private sector investment. Developer contributions. |
| MONITORING INDICATORS (MI) | 1, 3, 4 , 19 , 40, 41, 42, 43, 44, 45, 46, 50 |
| TARGETS | Policy sets out guidance on mix of development in this area Contribution to achieving annual employment targets in MI 1 and MI 3, and / or housing targets in MI19 and identification of housing land supply in MI30. |
| KEY RISKS | Economic trends Viability Developer / landowner intentions |
| MITIGATION | Engagement with landowners e.g. call for sites exercises Planned flexibility for either housing or employment development Necessary headroom in strategy to account for loss of employment land Site deliverability / viability issues have influenced distribution of development Viability caveats included in policy CS27 |
| TRIGGERS FOR REMEDIAL ACTION | Evidence of links to persistent and significant under delivery and under performance e.g. over a five year period, against MI1, MI3 and / or MI19, via MI40 – MI46. |
| POTENTIAL REMEDIAL ACTIONS | Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support Potential review of policy approach within Local Plan: Site Allocations and Development Policies Provision of additional policy guidance within Supplementary Planning Document Release of Green Belt land as employment land supply (see policy CS5) Potential review of Plan |

| POLICY OF KLPCS | CS14 Principal Regeneration Area – Prescot Town Centre |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Site allocation, master planning and development management processes. Current planning permission on Sewell Street. Public and private sector investment. Developer contributions. Prescot Townscape Heritage Initiative Prescot Town Centre Conservation Area Character Appraisal and Management Plan |
| MONITORING INDICATORS (MI) | 4, 40, 49 , 51, 52, 53, 54, 55, 56, 57 |
| TARGETS | Policy sets out guidance on mix of development in this area Indicative amount and phasing of new comparison retail floorspace to be as set out in tables 5.3 and 5.4 of the KLPCS Increased retail expenditure retention and footfall (MI 51 and 57) Proportion of vacant retail units within Prescot Town Centre (MI56) |
| KEY RISKS | Economic trends Viability Developer/ landowner intentions Non-delivery of retail development as the catalyst to meeting wider regeneration needs Prescot Town Centre Conservation Area continues to be included on the English Heritage 'at risk' register |
| MITIGATION | Policy emphasis upon improvements to Prescot Town Centre (including Prescot Conservation Area) Engagement with landowners e.g. call for sites exercises Site deliverability / viability issues have influenced distribution of development Flexibility for alternative approaches to the existing commitment if required Viability caveats included in policy CS27 |
| TRIGGERS FOR REMEDIAL ACTION | Evidence of links to persistent and significant under delivery of retail e.g. over a five year period, against MI49, MI54 and MI55 Persistent poor performance of Prescot Town Centre against MI56 |

| POLICY OF KLPCS | CS14 Principal Regeneration Area – Prescot Town Centre |
|----------------------------------|--|
| POTENTIAL REMEDIAL ACTIONS | Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support Potential review of policy approach within Local Plan: Site Allocations and Development Policies Provision of additional policy guidance within Supplementary Planning Document Potential review of Plan |

| POLICY OF KLPCS | CS15 Delivering Affordable Housing |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Development management process Developer contributions Preparation of supplementary guidance and evidence Partnership working with Registered Providers |
| MONITORING INDICATORS (MI) | 22, 23, 24, 26, 27, 33, 34, 35, 36, 113, 114 |
| TARGETS | No specific target for overall amount of affordable housing (MI 22-23) but policy requires 25% provision on market sector sites subject to provisos including viability (MI 24) Decrease in empty homes (MI 26) Increase in empty homes brought back into use (MI 27) Decreases in choice based letting demands, persons registered as homeless and households in fuel poverty (MI 34, MI 35 and MI37) |
| KEY RISKS | Affordable housing needs become even more pressing due to the increasing and unmet demand, resulting in overcrowded households. Residents moving out of the Knowsley to access affordable housing elsewhere with knock-on effects such as longer commuting patterns and more traffic, decline in the local economy, and, in extreme cases, homelessness. Economic trends, meaning viability affects ability to meet the requirements of the policy |
| MITIGATION | Policy inclusion of flexibility for lower proportions of affordable housing requirements where viability dictates. Viability caveats included in policy CS15 and linking to policy CS27 Viability evidence to be regularly updated. |
| TRIGGERS FOR REMEDIAL ACTION | A significant and persistent failure by market housing developers to deliver affordable housing Revised viability evidence indicates that the percentage sought is no longer viable for all developments |
| POTENTIAL REMEDIAL ACTIONS | Potential review of percentage stated in policy Provision of further or revised supplementary guidance |

| POLICY OF KLPCS | CS16 Specialist and Supported Accommodation |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Development management processes Council policies, procedures and plans, including Housing Strategy Partnership working across public and private sector agencies |
| MONITORING INDICATORS (MI) | 28 |
| TARGETS | No specific target identified |
| KEY RISKS | Lack of cooperation from partners, affecting joint working and preparation of integrated strategies Partner, developer and landowner intentions Provision of inadequate specialist and supported accommodation if policy is not applied consistently |
| MITIGATION | Proactive joint working by the Council Consider need for more detailed policy guidance for specialist and supported accommodation |
| TRIGGERS FOR REMEDIAL ACTION | Significant and persistent delivery of unsuitable accommodation Emerging evidence indicating a need for more detailed policy guidance |
| POTENTIAL REMEDIAL ACTIONS | Review policy approach through the Local Plan Provision of more detailed policy guidance Greater emphasis on joint working with key partners |

| POLICY OF KLPCS | CS17 Housing Sizes and Design Standards |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Development management processes Developer contributions Preparation of supplementary guidance |
| MONITORING INDICATORS (MI) | 18 , 25, 37, 59 |
| TARGETS | Decrease in numbers of households in fuel poverty (MI 37) Indicative mix of dwelling sizes on <u>current</u> evidence identified in KLPCS table 7.1 (new evidence will be reviewed as Plan period progresses) |
| KEY RISKS | Substantial changes to government-endorsed guidance for residential design standards Emergence of new evidence which significantly changes the mix of housing sizes required Economic trends, affecting development viability and compromising design quality of new residential development |
| MITIGATION | Policy inclusion of flexibility on meeting design standards and dwelling size mix Review of endorsed design standards undertaken regularly and recognition that these may change |
| TRIGGERS FOR REMEDIAL ACTION | Necessary to reflect radical change to recognised design standards or evidence regarding the delivery required to meet design standards |
| POTENTIAL REMEDIAL ACTIONS | Review Policy approach through the Local Plan Provision of more detailed policy guidance |

| POLICY OF KLPCS | CS18 Accommodation for Gypsies and Travellers etc. |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Development management processes Site allocations process Collation of evidence Public and/or private sector investment Council plans, procedures and plans |
| MONITORING INDICATORS (MI) | 29, 59, 70 |
| TARGETS | Level of provision will be determined in Local Plan: Site Allocations and Development Policies, including accommodation targets (MI 29). % new dwellings accessible by public transport, cycle and walking etc. in accordance with the "Ensuring a Choice of Travel" SPD/LTP (MI 70) |
| KEY RISKS | Developer / landowner intentions Difficulties in identifying a site or sites to accommodate accommodation targets Revised evidence indicates requirement to change accommodation targets over the plan period Change in government policy regarding the provision of accommodation for travellers |
| MITIGATION | Target-setting and site allocations undertaken through Local Plan process, including assessments, consultation and examination Evidence collated on sub-regional basis Regular review of government guidance and policy |
| TRIGGERS FOR REMEDIAL ACTION | Poor performance against targets (once set), including inability to identify appropriate supply of accommodation |
| POTENTIAL REMEDIAL ACTIONS | Review targets / allocations through the Local Plan Provision of more detailed policy guidance |

| POLICY OF KLPCS | CS19 Design Quality and Accessibility in New Development |
|-----------------------------------|---|
| PRIMARY DELIVERY MECHANISMS | Pre application engagement Development management process Master planning process |
| MONITORING INDICATORS (MI) | 37, 90, 105, 106, 112 |
| TARGETS | Local targets for number of appeals upheld (MI 112) Decrease in numbers of households in fuel poverty and crime levels (MI 37 and MI 105) |
| KEY RISKS | Economic trends Viability Developer / landowner intentions Failure to deliver high quality, appropriately designed schemes across should this policy not be applied consistently. |
| MITIGATION | Policy incorporates criteria which will ensure Knowsley's existing built and natural environment is complemented through seeking high quality design Design requirements have been viability assessed by evidence. |
| TRIGGERS FOR REMEDIAL ACTION | Identification of a number of appeal decisions upheld for design reasons when analysing MI112. |
| POTENTIAL REMEDIAL ACTIONS | Review policy approach through Local Plan. Consider the need for an associated SPD to provide detailed guidance. |

| POLICY OF KLPCS | CS20 Managing the Borough's Historic Environment |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Site allocation and development management processes. Public and private sector investment Conservation Area Management Plans Prescot Town Centre Townscape Heritage Initiative |
| MONITORING INDICATORS (MI) | 60, 61, 62, 63, 106 |
| TARGETS | Decrease / maintain at zero numbers of historic assets and Conservation Areas at risk (MI 60 and MI 61) |
| KEY RISKS | Developer / landowner intentions Pressure from development needs. Historic assets included on the English Heritage 'at risk' register |
| MITIGATION | Policy approach which provides proportionate protection for historic assets based upon their significance. |
| TRIGGERS FOR REMEDIAL ACTION | Any poor performance against MI60 and MI61 identified on an annual basis. |
| POTENTIAL REMEDIAL ACTIONS | Respond to historic assets and Conservation Areas at risk with targeted action to resolve any issues. |

| POLICY OF KLPCS | CS21 Greenspaces and Trees |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Site allocation and development management processes Public sector investment to support the priorities within the Knowsley Green Space Strategy, Liverpool City Region Green Infrastructure Framework and Mersey Forest Plan, as supported by evidence in the Greenspace Audit and Playing Pitch Assessment and Strategy Assistance from funding for sustainable transport schemes e.g. Local Sustainable Transport Fund Developer contributions |
| MONITORING INDICATORS (MI) | 86, 87, 88, 89, 90, 91, 92, 93, 95, 96, 108 |
| TARGETS | Performance against quantitative standards set in tables 8.1 and 8.2 of KLPCS (MI86 and MI87) Maintain or increase percentage of open space considered to be of good excellent quality etc. (MI 88) Increase in resident satisfaction with parks and open spaces (MI 90) |
| KEY RISKS | Variable existing provision across Borough Pressure to release greenspace for other uses such as development needs for housing and employment Reduced public sector resources available to deliver priorities within local standards Deliverability of quantitative improvements increasingly reliant upon development contribution or on-site provision |
| MITIGATION | Policy approach focussing upon retaining priority greenspaces based upon quantity, quality and accessibility Joint working with Knowsley Green Space Strategy and Playing Pitch Assessment to address shortfalls Submission of funding bids as required |
| TRIGGERS FOR REMEDIAL ACTION | Persistent poor or declining performance against target indicators (MI86, MI87 and MI88) Future Greenspace Audit or Playing Pitch Assessment could potentially find revisions to standards needed |
| POTENTIAL REMEDIAL ACTIONS | Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support Future review of standards through review of Local Plan |

| POLICY OF KLPCS | CS22 Sustainable and Low Carbon Development |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Development management processes Preparation of supplementary guidance and evidence Developer contributions via Allowable Solutions, including potential Community Energy Fund |
| MONITORING INDICATORS (MI) | 37, 47, 48, 59, 79, 80, 81, 109 |
| TARGETS | Decrease in numbers of households in fuel poverty (MI 37) |
| KEY RISKS | Substantial changes to government guidance for design standards. Economic trends, affecting development viability and compromising design quality of new development Developer/ landowner intentions |
| MITIGATION | Enhanced approach to delivery of pre-application advice Review of design standards undertaken regularly and recognition that these may change |
| TRIGGERS FOR REMEDIAL ACTION | Significant and persistent delivery of unsustainable development Emerging evidence indicating a new policy approach and/or more detailed policy guidance |
| POTENTIAL REMEDIAL ACTIONS | Potential review of policy approach within Local Plan: Site Allocations and Development Policies Provision of additional policy guidance within Supplementary Planning Document |

| POLICY OF KLPCS | CS23 Renewable and Low Carbon Infrastructure |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Development management processes Preparation of supplementary guidance Developer contributions via Allowable Solutions, including potential Community Energy Fund Energy Services Companies |
| MONITORING INDICATORS (MI) | 37, 47, 48, 79, 81 |
| TARGETS | Decrease in number of households in fuel poverty (MI 37) |
| KEY RISKS | Economic trends and changes to public sector subsidy, affecting the viability of renewable and low carbon installations |
| MITIGATION | Enhanced approach to delivery of pre-application advice Review of public sector funding availability undertaken regularly and recognition that this may change |
| TRIGGERS FOR REMEDIAL ACTION | Emerging evidence indicating a new policy approach, more detailed policy guidance or site-specific allocations |
| POTENTIAL REMEDIAL ACTIONS | Review policy approach and/or site allocations through the Local Plan: Site Allocations and Development Policies Provision of more detailed guidance within a Supplementary Planning Document |

| POLICY OF KLPCS | CS24 Managing Flood Risk |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Development management processes Collation of flood risk assessment evidence Public and private sector investment |
| MONITORING INDICATORS (MI) | 75, 76, 77 |
| TARGETS | Target of 0 applications per annum granted contrary to Environment Agency advice (M1 75) |
| KEY RISKS | Updates to Environment Agency Flood Maps resulting in increased areas of flood risk Developer and landowner intentions Economic trends, affecting development viability and compromising deliverability of SuDS assets |
| MITIGATION | Review of flood risk information Review of Environment Agency Flood Maps undertaken regularly and recognition that these may change |
| TRIGGERS FOR REMEDIAL ACTION | Insufficient development land available within suitable locations outside areas of significant flood risk |
| POTENTIAL REMEDIAL ACTIONS | Review policy approach through the Local Plan: Site Allocations and Development Policies Provision of more detailed guidance within a Supplementary Planning Document Allocation of alternative development locations via Local Plan: Site Allocations and Development Policies Provision of more detailed policy guidance and/or master planning of specific sites |

| POLICY OF KLPCS | CS25 Management of Mineral Resources |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Development management processes Private sector investment |
| MONITORING INDICATORS (MI) | 71, 72, 73 |
| TARGETS | No specific target identified |
| KEY RISKS | Developer and landowner intentions Inadequate production of primary land won aggregates Inadequate production of secondary and recycled aggregates |
| MITIGATION | Consider need for more detailed policy guidance |
| TRIGGERS FOR REMEDIAL ACTION | Significant and persistent under delivery of primary, secondary or recycled aggregates Emerging evidence indicating a need for more detailed policy guidance and/or Mineral Safeguarding Areas |
| POTENTIAL REMEDIAL ACTIONS | Review policy approach through Local Plan: Site Allocations and Development Policies Provision of more detailed policy guidance Identification of Mineral Safeguarding Areas via Local Plan: Site Allocations and Development Policies |

| POLICY OF KLPCS | CS26 Waste Management |
|-----------------------------------|---|
| PRIMARY DELIVERY MECHANISMS | Implementation of the policies within the Merseyside and Halton Joint Waste Local Plan Development management processes Public and private sector investment |
| MONITORING INDICATORS (MI) | 74, 85, 91 |
| TARGETS | See Merseyside and Halton Joint Waste Local Plan – Table 6.3, page 91—93 (MI 85) |
| KEY RISKS | Failure in application of the Waste Local Plan policies Provision of unsustainable forms of waste management |
| MITIGATION | Application of Waste Local Plan policies relating to waste facility safeguarding and site prioritisation (WM1-7) and relating to design and sustainability (WM0, WM8-16) Regular review of evidence and monitoring information |
| TRIGGERS FOR REMEDIAL ACTION | Significant and persistent failure to meet targets prescribed in Waste Local Plan (see above) |
| POTENTIAL REMEDIAL ACTIONS | Review of the Plan to change or strengthen policies |

| POLICY OF KLPCS | CS27 Planning and Paying for New Infrastructure |
|-----------------------------------|--|
| PRIMARY DELIVERY MECHANISMS | Development management process (including assessments and developer contributions) Preparation of supplementary guidance Public and private sector investment |
| MONITORING INDICATORS (MI) | 23, 24, 29, 40, 47, 48, 59, 64, 65, 69, 70 , 80, 91, 92, 96, 113, 114, 115 |
| TARGETS | Delivery of transport schemes in Knowsley etc. in accordance with the LTP (MI 64) % new dwellings accessible by public transport, cycle and walking etc. in accordance with the "Ensuring a Choice of Travel" SPD/LTP (MI 70) Delivery of major infrastructure schemes as set out in the Infrastructure Delivery Plan (MI 115) |
| KEY RISKS | Uncertainty regarding availability of public and private sector funding for infrastructure Economic trends and viability Developer and landowner intentions Impact of CIL regulations and other government-led changes on preparation of supplementary guidance |
| MITIGATION | Flexible approach in the KLPCS to policy guidance for developer contributions Flexible approach to account for challenging economic circumstances and development viability Ability to refresh Infrastructure Delivery Plan content |
| TRIGGERS FOR REMEDIAL ACTION | Significant and persistent under provision of infrastructure, detrimentally affecting new development Review of evidence base and IDP |
| POTENTIAL REMEDIAL ACTIONS | Review of Local Plan policy Provision of supplementary guidance |

Notes

- 1. Indicators which are marked in **bold** in the table above are Core Indicators as defined in the Monitoring Framework (SD15).
- 2. The table contains amendments to the monitoring framework as follows:
 - MI112 "number of appeals upheld" also applies to policy SD1 and will have a local target set
 - Indicators MI 49,50 and 51 also apply to policy CS6