

BY EMAIL ONLY to:

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The Hartlepool Borough Council Local Plan – Examination Submission of Hearing Statements

MATTER 18: Monitoring and Implementation

Issue 1: Does the Plan set out a clear and robust framework for delivery and monitoring?

A number of representations on the published plan raised concern that there was no monitoring and implementation framework for the Plan. The Inspector encourages those who have raised such concerns to look at document [HLP01/3] – the Local Plan Implementation and Monitoring Framework – which accompanied the Publication Plan. The Council is proposing (see MM/APP12/01 in document EX/HBC/19) that the Framework is embedded in the Plan as an appendix.

Question 1: Is the proposed monitoring framework robust and effective? What are the intended mechanisms and timescales for monitoring the implementation and effectiveness of the policies and proposals in the Plan?

Question 3: Are suitable arrangements in place for reviews at appropriate times? Is it clear when monitoring will trigger action? Is it sufficiently clear how the Plan will be monitored? If not, could it be made clearer?

The RSPB previously recommended the production and implementation of a monitoring strategy alongside the mitigation strategy to monitor and evaluate its effectiveness. Monitoring should be informed by the conclusions of the AA and any mitigation measures considered necessary by the Local Authority to meet the requirements of the Habitats Directive. A key part of the monitoring plan is to ensure that the mitigation strategy is working properly, and as predicted within the AA, and that European sites are not being adversely affected by development provided for in the plan. By ensuring that the monitoring information is fit for purpose any European site deterioration arising from the implementation of the policies or allocations, or problems with a mitigation scheme, can be identified and addressed at the earliest possible stage - limiting the further harm done. As a minimum this will require key pieces of information including:

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The RSPB is part of BirdLife International,
a partnership of conservation organisations
working to give nature a home around the world.

- The conservation condition of the European site and the reasons for that condition
- The location and scale of relevant development identified during the AA process and
- The location, scale and effectiveness of mitigation measures identified in the plan.

An effective strategy would keep a track of:

- The receipt of payments towards mitigation
- The number and location of houses (and other relevant development) being delivered
- The location and rate of mitigation delivery
- The level of use of the SPA for recreation at the outset and of the housing/leisure development
- The population and distribution of the birds that use the SPA both at the outset of development delivery and over time.

We note that HBC is relying on the Plan's overall Plan monitoring framework document (HLP01/3) to deliver monitoring of its mitigation strategy. We have reviewed HLP01/3 and consider that it will provide some (but not all) of the evidence detailed above. We recommend that HBC reviews its decision not to produce a bespoke monitoring programme alongside its mitigation strategy so that it is able to provide the robust evidence required as detailed above.

We appreciate that the mitigation strategy and associated action plan will develop year upon year and the case for the implementation for some measures will be made commensurate with the number of new dwellings occupied and to deal with increases in residential and tourism-promoted activity. It is therefore, vital that appropriate triggers are built into the monitoring strategy. Triggers should be based on the following criteria:

- Under-usage of SANGs in attracting visitors
- An increase in recreational use of the SPA
- Decreasing SPA bird populations

We consider that problems in relation to any of the above criteria should be adequate to trigger a review of the mitigation framework. As a secondary tier we suggest the monitoring of developer contributions raised, and associated mitigation expenditure to ensure that money is being raised as forecast, and that when it is raised it is being spent in a timely and appropriate manner to deliver the mitigation that the plan is relying upon.

END