

CHAPTER 4 - STATEMENT OF PLAN MONITORING

Chapter 4 - General

Objections

0156/036	CPRE (2)	4.00
0237/018	Mr T J Baker	4.00
0245/002	South West RSL Planning Consortium	4.00
0458/001	Hygrade Foods Ltd	4.00
0534/001	House Builders Federation	4.00

Issues

The main issues raised in the representations are:

- a. The adequacy of the reasoned justification.
- b. The adequacy of the proposed monitoring system.

Reasoning and conclusions

- 4.1 **Issue a.** The concerns of objector 0156 were addressed in the RDDLP and I note that the objection has been conditionally withdrawn.
- 4.2 **Issue b.** I consider that it is unnecessary and impractical in terms of the available data to introduce measurable targets at this late stage in the Local Plan process as suggested by objector 0237. The Council acknowledges that it may be possible to introduce specific targets in the future when more data is available.
- 4.3 I agree with the objectors that the proposed monitoring system does not adequately address the issue of the monitoring and management of housing land, including the provision of affordable housing, having regard to the advice in DETR publications "Monitoring Provision of Housing through the Planning System: Towards Better Practice and Housing Needs Assessments – December 2000. I consider that the Monitoring Table could usefully include an indicator of progress towards the Structure Plan housing target, a fact that the Council's acknowledges in its response to the objections. Target A1 includes an indicator of the number of affordable houses built. I consider that to be adequate until such time as the Council reviews its policy approach to the provision of affordable housing through the Housing and Employment DPD. My reservations regarding the affordable housing policies within the Local Plan are explained later in the report

Recommendation

- 4.4 **I recommend that Table 4.1 be modified at A1: Land and Buildings by the addition of a further key indicator namely: 'no. of houses required to meet the Structure Plan housing requirement' I make no other recommendations in respect of the above objections.**

Chapter 4 - Paragraphs 4.01-4.04

Objections

0714/501	Pegasus Planning Group	4.01
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0714/502	Pegasus Planning Group	4.03
0714/503	Pegasus Planning Group	4.04
0104/005	Lydiard Tregoz Parish Council	4.01
0114/005	Mrs C Spickernell	4.01
0114/501	Mrs C Spickernell	4.01
0156/511	CPRE (2)	4.01
0156/540	CPRE (2)	4.01
0156/541	CPRE (2)	4.01
0156/542	CPRE (2)	4.01
0156/543	CPRE (2)	4.01
0287/023	George Wimpey (UK) Ltd & The Trustees of the Methuen Intermediate Settlement	4.01
0287/024	George Wimpey (UK) Ltd & The Trustees of the Methuen Intermediate Settlement	4.01
0387/013	David Wilson Estates	4.02
0459/052	Persimmon Strategic Land Ltd	4.02
0387/014	David Wilson Estates	4.03
0459/053	Persimmon Strategic Land Ltd	4.03
0169/010	Lacock Parish Council	4.04
0311/009	Showell Protection Group	4.04

Issues

The main issues raised in the representations are:

- a. Whether paragraph 4.01 requires amendment.
- b. Whether paragraph 4.02 requires amendment.
- c. Whether paragraph 4.03 requires amendment.
- d. Whether paragraph 4.04 requires amendment.

Reasoning and conclusions

4.5 **Issue a.** I do not consider that the detailed wording of the paragraph needs amending as suggested by objectors as it reflects the advice in paragraphs 2.17 to 2.19 of PPG12. The plan confirms that monitoring will take place as an ongoing process and displayed in an annual report. There is no need to state that report will be made available to the public. Nor is it necessary to specify the frequency with which individual targets will be monitored. It is unnecessary for the paragraph to state that the monitoring process will inform the preparation of the new development plan process, as that fact is acknowledged in paragraph 4.3. I do not consider that paragraph 4.3 should be amended to indicate how the monitoring system will inform the LDF and the preparation of DPDs as that it is a matter which should be addressed in those documents.

4.6 Several objectors recommend additions to the key indicators. In my view, the additional indicators are either already covered by the key indicators in Table 4.1, could not be effectively monitored in practice, would be too site or area specific for monitoring the general effectiveness of the Plan's policies, or cover matters that go beyond the scope of a local plan, such as the outcome of environmental health complaints. It would be inappropriate for D1 to refer only to mixed-use working environments as all employment floorspace should be monitored. It has however been acknowledged by the Council that an indicator should be included relating to progress towards meeting the Structure Plan housing requirement and I have recommended above that the Table 4.1 be modified accordingly. I also consider that Table 4.1 should be modified as set out in PICs 15, 16, 17, 18 and 19.

- 4.7 **Issue b.** The wording of the paragraph does not require modification. Local Plan policies cannot be changed by SPG. The latter does not have the status of policies within an adopted development plan. Any changes to the policies of the Local Plan would have to be made in accordance with the relevant statutory procedures or through the LDF process which allow for public consultation and objection. I also consider that it is appropriate that the plan monitoring should inform the preparation of SPG, so that detailed guidance can be prepared where necessary to supplement the policies of the Local Plan.
- 4.8 **Issue c.** I have previously considered issues relating to monitoring and the LDF process in paragraph 4.5 above. I do not consider that paragraph 4.3 of the Plan lacks clarity. It sets out clearly the Council's intentions in respect of monitoring. In practice, as objectors appear to assume, any review and updating of the policies of the Local Plan will be as part of the new development plan system, on which the Council has already commenced work. As that system is subject to statutory procedure, there is no need to explain within the Local Plan the mechanisms for altering policy.
- 4.9 **Issue d.** As the monitoring system relates to the Local Plan, it would be inappropriate for the paragraph to refer to LDF rather than the Local Plan, notwithstanding the limited life of the Local Plan and the fact that in practice the monitoring exercise will inform the production of the LDF. The suggestion that the Community Strategy should have been available when the Local Plan was placed on deposit has been overtaken by events. Furthermore, as the purpose of monitoring is to assess how the plan is working in practice, it is not clear to me why objectors wished to be able to monitor both documents during the consultation period.

Recommendation

- 4.10 **I recommend that table 4.1 be modified in accordance with PICs 14, 15, 16, 17, 18 and 19 and in accordance with my recommendation at paragraph 4.4 above. I make no other recommendations in respect of the above objections.**

Chapter 4 - Paragraph 4.05 and Table4.1

Objections

0114/006	Mrs C Spickernell	4.05
0124/001	English Heritage	4.05
0127/004	Dr R Pagett	4.05
0157/013	Wiltshire Wildlife Trust	4.05
0157/014	Wiltshire Wildlife Trust	4.05
0169/011	Lacock Parish Council	4.05
0231/038	Purton Parish Council	4.05
0231/039	Purton Parish Council	4.05
0231/040	Purton Parish Council	4.05
0231/041	Purton Parish Council	4.05
0231/042	Purton Parish Council	4.05
0304/010	Redrow Homes	4.05
0311/010	Showell Protection Group	4.05
0376/012	Slaughterford Action Group	4.05
0387/015	David Wilson Estates	4.05
0391/003	Malmesbury Civic Trust	4.05
0391/004	Malmesbury Civic Trust	4.05

0459/054	Persimmon Strategic Land Ltd	4.05
0482/002	Bloor Homes Ltd and Laing Homes Ltd Hunter's Moon Consortium)	4.05
0345/514	Wiltshire County Council	Table 4.1
0345/515	Wiltshire County Council	Table 4.1
0714/504	Pegasus Planning Group	Table 4.1

Issue

- a. The main issue raised in the representations is whether additional indicators should be included in table 4.1 and whether the listed indicators should be quantified.

Reasoning and conclusions

- 4.11 **Issue a.** Several of the objections relate to issues which I have already considered under objections made to paragraphs 4.1 to 4.4 above. Many of the additional indicators suggested by objectors are either covered adequately by the existing indicators or would be difficult to monitor effectively at the present time. Furthermore, the monitoring system should be focused on the land-use planning matters that are the subject of the Local Plan. They should not relate to matters that fall outside the scope of the plan. For example, as it is not a purpose of the Local Plan to publish conservation area appraisals, it would be inappropriate to include an indicator relating to that matter. Other issues may be more appropriately addressed and monitored through the Community Strategy. The alterations to the table in the RDDLP and the PICs published by the Council in response to the objections are, in my view appropriate.
- 4.12 I consider it sufficient for Table 4.1 to broadly list the targets and key indicators. The more detailed and quantified information requested by objectors would introduce an unnecessary level of detail and complexity into the Local Plan. Such details are better contained within the monitoring reports. The Council has confirmed that the monitoring will include a housing trajectory that indicates the number of houses built and the shortfall if any of the Structure Plan provision and that the information gained from monitoring will be used to inform the production and review of the LDF.

Recommendation

- 4.13 **See paragraphs 4.4 and 4.10 above. I make no additional recommendations in respect of the above objections.**