

Matter 5: Monitoring and Implementation

Issue 7: Does the Plan have clear and effective mechanisms for implementation, delivery and monitoring?

Question 7.1: Is there a clear and robust framework for the delivery and monitoring of WHSAP policies?

1. My previous concerns with respect to Monitoring were made in representations 677 and 678 on the draft Wiltshire House Sites Allocation Plan (WHSAP). [WHSAP/12, App Q, p. 742, 743]
2. WHSAP Regulation 22 (1) (c) Statement of Consultation, Appendix M, Part 29 Regulation and Monitoring covers representations 677 and 678. The absence of an up to date AMR is stated as being one of the issues raised, however there is no response to this in the Council's response, and no changes are proposed. [WHSAP/11, table 21.30 and paras 21.135 – 21.138]

Legal Compliance

3. The Local Development Scheme indicates that '*Annual Monitoring Reports (AMR) monitor and review how well the council has performed against the timetable set out in the LDS and any changes needed to maintain an up to date LDS. The role of the AMR is also to monitor the effectiveness of the policies included in each DPD*'. [LDS/01, para 2.21] However it continues to be the case that there has been no Annual Monitoring Report produced since 2010-11 [AMR/01].
4. Since monitoring has not been conducted in accordance with the LDS the Plan is not legally compliant.

Effectiveness

5. The Inspector into the Wiltshire Core Strategy made it clear that it is important to have a monitoring framework in place. "*To be sound, the CS must be effective. The effectiveness of any plan is partly dependent upon the means by which its implementation is managed. The effective use of monitoring against suitable benchmarks is a key means by which the success of a plan may be gauged. I view such matters of particular importance. Whilst the monitoring criteria have been removed from each CS Policy within the main document, the Monitoring Framework for the Wiltshire Core Strategy has been updated and is clearly referenced within Section 7 of the CS wherein there is a*

commitment to prepare an Annual Monitoring Report that will assess the operation of Core Policies linked to both the IDP and the SA.” [WCO/11, para 421].

6. The Inspector also referred to the role of Transport Strategies identified in Core Policy 63, and makes reference to an ‘iterative Monitoring Framework’ and the need for stated indicators to be updated and reviewed to ensure the efficacy of the policy. [WCO/11, para 427].
7. There was a Monitoring Framework produced in 2012 which is available on Wiltshire Councils website (<https://pages.wiltshire.gov.uk/wiltshire-local-plan-monitoring-framework-feb-2012.pdf>). This gave targets and indicators for each of the Core Strategy Core policies. While one could take issue with the effectiveness of some of the targets and indicators which have been chosen it was at least a step in the right direction. However the Monitoring Framework appears not to have been updated and is presumably no longer deemed current as no Monitoring Framework seems to have been made available for this current examination.
8. This seems at variance with the statement in the WHSAP Submission draft Plan that *“An annual report will be prepared to analyse the impacts of the Core Policies of the WCS and assess progress against the targets identified in the Wiltshire Monitoring Framework”* [WHSAP/01/01, para 7.7].
9. Since there is no current Monitoring Framework, and no recent Annual Monitoring Reports, it is concluded that the Plan is unsound. While housing numbers may be monitored there is rather more to sustainable development than this, and without any indicators regarding compliance with other Core Strategy policies the WHSAP seems to be unsound and ineffective.

Changes being sought

10. The Plan can only become sound and legally compliant if a Monitoring Framework is delivered together with an up to date Annual Monitoring Report which assesses progress against the targets identified in the Monitoring Framework.

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