

MATTER 5: MONITORING AND IMPLEMENTATION

- 1.1 This matter statement is prepared on behalf of Terra Strategic Ltd in relation to its land interests on land to the west of Semington Road, Melksham. An outline planning application is currently pending for up to 108 dwellings which would be up to 100% affordable homes (reference 18/04650/OUT).

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

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

- 1.2 We have a number of concerns regarding Wiltshire Council's (WC) ability to appropriately implement, deliver and monitor the WHSAP, namely based on their previous performance monitoring the Wiltshire Core Strategy (WCS) and their ability to produce robust and timely Five-Year Housing Land Supply (5YHLS) position statements.

- 1.3 The key mechanism for monitoring the WCS is the production of an Authority Monitoring Report¹ (AMR). Paragraph 7.3 of the WCS states:

“An annual report will be prepared to analyse the impacts of the Core Policies, and assess progress against the targets identified in the Wiltshire Monitoring Framework.” [emphasis added]

- 1.4 With regard to national policy, the role of Authority Monitoring Reports is outlined in Planning Policy Guidance (PPG), which states:

“Local planning authorities must publish information at least annually that shows progress with local plan preparation, reports any activity relating to the duty to cooperate, any information collected which relates to indicators in the plan, and any policies which are not being implemented.” [emphasis added]

Paragraph: 054 Reference ID: 61-054-20180913

- 1.5 Both the WCS and PPG clearly articulate that AMRs should be produced by local authorities annually to monitor the progress of plans and their policies. Since the adoption of the WCS in January 2015 WC has not produced a single AMR, meaning WC has failed to assess the progress of policies in the WCS for four consecutive years. It is, therefore, reasonable to conclude that WC has not been able to monitor any of the WCS policies since the Plan's adoption. WC has provided no evidence to suggest this will be any different when monitoring the WHSAP.

- 1.6 In respect of 5YHLS position statements, the most recently published by WC was in March 2018 using a base date of 1st April 2017. This position was then amended through Topic Paper 3 (TP3), published July 2018, which gives no breakdown of

¹ previously known as Annual Monitoring Reports

sites included, nor does it seek provide any evidence or justification that the sites included are deliverable.

- 1.7 The WHSAP states at paragraph 3.5 that one of the objectives of the Plan is:
- “To help demonstrate a rolling five-year supply of deliverable land for housing development – a duty on each Local Planning Authority required by the NPPF.”***
- 1.8 Similarly, the PPG states:
- “All local planning authorities will need to ensure that they carry out an annual assessment of their 5-year land supply in a robust and timely fashion, based on up-to-date and sound evidence.”***
- 1.9 Even though WC is clearly aware of its statutory duty, it has not produced a 5YHLS position statement since March 2018, with a base date of 1st April 2017. Given that we are almost at the 1st April 2019 it is concerning WC has gone almost two years without producing a 5YHLS. This once again demonstrates that WC has failed to comply with monitoring procedures set out in local and national policy.
- 1.10 Not only does WC have a poor track record in monitoring its housing delivery, it has also failed to identify a housing trajectory for the WHSAP, programming how the housing will be delivered over the remaining plan period and beyond. In order to monitor the progress of the WHSAP a clear trajectory needs to be established which is currently absent.
- 1.11 The above casts significant doubt on Council’s ability to appropriately and consistently monitor the WHSAP. Accordingly, TKP is of the firm view that WC has not provided a clear and robust framework for the delivery and monitoring of WHSAP policies. Consequently, the WHSAP fails the test of soundness as it is not positively prepared, nor is it consistent with national policy, effective and justified.