Matter 16 /WDC

Wealden District (Incorporating part of the South Downs National Park)

Core Strategy Hearing

Matter 16: Monitoring and Implementation - Statement by WDC/ SDNPA

December 2011

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

Matter 16 : Monitoring and Implementation .

A) Does the Core Strategy include clear arrangements for managing and monitoring the delivery of the strategy?

1.1 Yes. Background Paper 13 (BP13 - Implementation and Monitoring Framework) sets out the arrangements for managing and monitoring the Core Strategy. Within the Core Strategy itself we set out at paragraphs 8.4 - 8.6 these arrangements and confirm that the Council will use the Annual Monitoring Report (AMR) to identify the need to review any elements of the Core Strategy where monitoring has identified a sustained failure to meet targets or which are necessary to meet changes in national policy. A series of indicators will be used to monitor the effectiveness of Core Strategy policies. This is assessed in terms of how effective the policies are in enabling Core Strategy objectives to be met. The indicators are set out in BP 13 (Table 1) and in the AMR, section 7, LDF indicators.

1.2 BP13 and the AMR contain a set of indicators in relation to each spatial planning objective, together with a specific target for each indicator. These indicators will be monitored through the Council's AMR process, with this years AMR (2010/11) being the first to include a full set of these indicators. In total the AMR includes some 42 indicators in relation to the 15 different spatial planning objectives set out within the Core Strategy.

1.3 Sixteen of the indicators identified in the AMR monitor delivery of the Core Strategy policies in a very direct and specific way. These will be monitored through the AMR reporting process in subsequent years. These indicators are (see table on following page);

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Indicator number	Indicator name
3d	Strategic completions
4a	Strategic allocations
4b	Retail provision
5a	School places
7a	Housing distribution
7b	Employment distribution
7c	Retail distribution
8a	Distribution of housing completions
8b	Exception sites
10a	Risk of flooding
11a	Green Infrastructure
11b	ANGst
13a	Living environment
14c	Housing density
15a	IDP action plan
15b	Access to GP

1.4 Each indicator has a specific target associated with it and this is set out in greater detail within section 7 of the AMR. The Council's AMR, approved by Cabinet at its meeting of the 14th December, is posted on the Council's website.

1.5 In addition to the above indicators, other indicators indirectly reflect the performance of Core Strategy policies and these will also be used to help monitor this performance. For example, indicator 3a measures total housing completions per annum. Whilst this figure will be expected to be influenced by windfall developments in addition to development coming forward from Neighbourhood Plans and exception sites, it will also reflect progress in relation to delivering allocated sites. Indicator 3a is therefore highly relevant to consideration of the performance of Core Strategy policies WCS1, WCS2, WCS4 and WCS5 in managing the overall delivery of housing. Other indicators will also help to fulfil this function of assisting in the monitoring of Core Strategy policies.

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B) Does the Core Strategy identify sufficient targets and milestones to enable the delivery of policies to be measured? Are the circumstances under which remedial action would be triggered sufficiently clear?

2.1 Yes. Each of the 42 indicators has a specific target as specified in BP13 (Table 1) and this is reflected in the AMR (section 7, LDF indicators). The success of delivery of policies will be assessed in terms of the extent to which these targets are being achieved.

2.2 The documents referred to above (AMR and BP13) also contain specific milestones and triggers which are set out in relation to a number of indicators. These enable a clear understanding of the circumstances under which some form of review or remedial action would be taken. Examples of these are set out below:

Spatial planning objective 3 (housing provision).

Indicator 3a (AMR paragraph 7.4) measures total housing completions per annum. This indicator is included within BP13 (see Table 1, page 5 - NI 154/AMR H2b). The target set for this particular indicator is for completions to be in line with the Core Strategy housing trajectory (Core Strategy Figure 4, page 30).

2.3 The AMR establishes a clear set of trigger points for this indicator (Please see approved AMR paragraph 7.4.1) with specific actions identified as being triggered should completions be more than 15% below the target at the end of each 5 year period. These actions include an examination of the reasons for any shortfall, together with proposed actions e.g. liaison with developers, and development of other initiatives to overcome impediments to growth.

2.4 The AMR sets out that should completions fall 25% or more below the target, then a review of the policy and evidence base will be triggered to examine whether any review or partial review of DPDs is required. We consider that the circumstances of any such action being required is therefore made clear within our monitoring approach.

2.5 Progress towards the targets will be monitored annually and appropriate action triggered should this be considered to be required. This would also apply in cases where it was evident that the target would be unlikely to be met at the next milestone date.

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2.6 Indicators 3b and 3c relate to affordable housing. Indicator 3b measures affordable housing completions as a percentage of all completions[1]. This indicator has not previously been measured and will be measured for the first time for inclusion within the 2011-12 Wealden AMR. Indicator 3c measures total affordable housing completions per annum. Indicators 3b and 3c are set out at paragraph 7.4 of the AMR and within Table 1, SPO3, page 5 of BP13.

2.7 Indicator 3d measures housing completions per annum by Strategic Development Area. The target for this indicator is for completions on each strategic site to be in line with figure 5 of the Core Strategy which deals with Phasing of Development (see Table 1, SPO3, page 5 of BP13- Implementation and Monitoring Framework). The AMR establishes a set of trigger points for this indicator (paragraph 7.4.3) and confirms that if development has not commenced within 2 years of the proposed start date then specific actions will be triggered. These actions include an examination of the reasons for any shortfall, liaison with developers, and development of initiatives to overcome impediments. If development has not commenced within 5 years of the proposed start date then a review of the policy and evidence base will be undertaken to examine whether a change in policy is necessary.

2.8 For sites with more than 200 dwellings, a further set of triggers applies to the rate at which these sites are built out. The progress of development is monitored in 5 year periods and specific action is triggered if development falls behind the schedule as set out in Figure 5 of the Core Strategy by at least 15% at certain specified dates (Appendix A - AMR paragraph 7.4.3, part 2). If the rate of development is more than 25% short of the target then a review of the policy and evidence base will be undertaken to examine whether a change in policy is necessary (Appendix A - AMR paragraph 7.4.3, part 2).

2.9 A separate but similar process is identified for strategic development areas with less than 200 dwellings proposed, as these have a much shorter anticipated build out period (Figure 5, Submission Core Strategy) and therefore require different triggers to apply. Actions are triggered if development falls short of the schedule by at least 15% at a point halfway through the proposed build period with a further response required where development falls more than 25% short of the schedule.

[1] Excludes small sites which fall below the policy requirement to provide affordable housing.

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2.10 Indicator 3e measures the total number of homeless in priority need.

2.11 Indicator 3f measures the number of net additional Gypsy and Traveller pitches which have been granted permission. The target is 23 net additional pitches granted planning permission by 2016. The AMR will monitor this target and confirms that if the target is not reached by 2016 then a series of actions would be triggered (AMR 2010/2011 paragraph 7.4.5).

Spatial Planning Objective 4 (supporting the viability of Wealden's principal towns)

Indicators 4a and 4b measure new planning consents in relation to employment and retail developments by Strategic Development Area. These economic indicators are set out under Spatial Planning Objective 6 in BP13 (page 7). The target is for these planning consents to be in line with policy WCS 3 in the Core Strategy. The AMR (2010/11) sets out at paragraph 7.5 the milestones which need to be reached in order to achieve the target development by 2030. For the milestones to be met there will be a requirement for planning consents to be in place to provide 50% or more of the total floorspace (by type) by town by 2020 and 75% of the total floorspace by 2025. If these milestones are not met then a specific set of actions is set out including an examination of the reasons for any shortfall, liaison with developers, and development of initiatives to overcome impediments. These also include a review of the policy and evidence base to see whether a change of policy is necessary.

2.12 In conclusion on Matter 16 we consider that the Core Strategy does include clear arrangements for the management and monitoring of the delivery of the Strategy. Through our submitted Implementation and Monitoring Framework and Annual Monitoring Report we identify sufficient targets and milestones to enable delivery of the policies to be measured together with clear explanation of those circumstances which would trigger any required remedial action .