

Barton Willmore on behalf of Story Homes Ltd
Examination into the Fylde Council Local Plan to 2032
Matter 10
Representation ID: 058

Matter 10 – Monitoring Framework

1. The following Hearing Statement is made for and on behalf of Story Homes. This Statement responds to selected questions set out within Matter 10 of the Inspector's *Matters, Issues and Question*.

Issue 13 – Is the Plan deliverable and capable of being effectively monitored?

80. Will the proposed monitoring framework set out in Appendix 8 of the Plan be effective to ensure delivery of the proposals during the Plan period? Does its location within the appendices to the Plan give due weight and effectiveness to the monitoring framework?

2. The Monitoring Framework confirms that the Local Plan will be monitored at the end of each financial year in March, so as to ensure that its policies are effective and reflect changing circumstances nationally, sub-regionally and locally. The finding of which will be set out within the Authority Monitoring Report.
3. Story Homes supports the Council's proactive approach to monitoring, however, Appendix 8 does not identify any specific triggers or proposed actions if the targets for each indicator are not met. For housing, the Plan must be clear what action will be taken if the Council are unable to demonstrate a five year housing land supply or fail to meet their housing requirement. Suitable actions could include the release additional land, review of the Council's SHLAA or a new Site Allocations DPD to allow new land to come forward.
4. Notwithstanding this, as drafted the Monitoring Framework is not effective in ensuring the delivery of proposals during the Plan period.

81. Are the proposed targets appropriate?

a. Is Indicator 1's reference to a 'target requirement' appropriate?

5. Story Homes does not consider the reference to a 'target requirement' appropriate. This would suggest that this figure places a 'cap' on development and this is contrary to paragraph 47 of the NPPF which requires local planning authorities to boost significantly

the supply of housing. The wording of the target/policy outcome column should be amended to state:

"To deliver a minimum of xxx homes per annum" [to be completed with appropriate housing requirement figure]

b. Is the proposed target for Indicator 13 measurable?

6. Indicator 13 relates to developer contributions and states the performance monitoring indicator will be tested against 'value of developer contributions collected'. It is unclear how this will be measured. The measurement for the effectiveness of developer contribution policy should be whether the identified (and justified) sought infrastructure, per the site allocation, is provided via the development of each scheme. As drafted. This reads simply as a tax collection approach by the Council.

c. As per the Council's comments on page 185 of SD011 have appropriate indicators, targets and timescales for Indicator 19a-d been discussed with Historic England?

7. Story Homes has no comments to make in response to this question.

82. Is it clear when a review of policies of the Plan may be necessary?

8. As stated in our response to Question 80, the Monitoring Framework does not set out any triggers for a review of policies in the Plan. To be effective, the Council must include these triggers within the Monitoring Framework and set out actions to ensure each indicator is met. As such, the Monitoring Framework cannot be considered effective and sound.