



HALLAM LAND MANAGEMENT LTD

FYLDE COUNCIL LOCAL PLAN

EXAMINATION HEARING STATEMENT

MONITORING FRAMEWORK (MATTER 10)

ISSUE 13

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Your Refs: Representor No. 19

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1. MATTER 10 – MONITORING FRAMEWORK

- 1.1 The following statement is made on behalf of Hallam Land Management and should be read alongside our representations to the Publication Local Plan in September 2016 (Ref: R009v2).
- 1.2 In respect of this matter, we are happy to rely on our written submissions so will not be attending the hearing on this.

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

Question 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?

- 1.3 Given that the recent Housing White Paper places more emphasis on monitoring and review, particularly in respect of housing delivery, it may be better to include the Monitoring Framework as a chapter in the main document to give it increased weight. That said, it is referred to within the main text in the Strategic Objectives section (paragraphs 4.2) which the Inspector may feel is sufficient.
- 1.4 It would also be worthwhile including the housing delivery test thresholds set out in paragraph 2.49 of the White Paper to assist delivery across the plan period.
- 1.5 Finally, we would reiterate the point about AMRs raised in our previous representations, in that they are a very important tool for monitoring Local Plans, particularly with the new housing delivery tests in the White Paper; however to be effective they must be produced annually and in a timely fashion, and whilst Fylde have produced AMRs from 2014-2016, they didn't in the two years before that, so the Council must ensure a consistent approach going forward.

Question 81: Are the proposed targets appropriate?

- 1.6 We would request that the targets are revisited in line with our comments on Matters 5 and 6, particularly in respect of the:
- Housing requirement and distribution targets in indicators 1 to 4,
 - National Technical Standards target in indicator 5; and
 - Density target in indicator 10.

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

- 1.7 No, we would suggest this is replaced with 'minimum requirement'.

b. Is the proposed target for Indicator 13 measurable?

- 1.8 We welcome the Council's intended transparency on this issue, however it may prove to be onerous and will only be measurable if it is linked to the Delivery Schedule at Appendix 2 of the submitted Infrastructure Delivery Plan (SD003) so it may be worth adding reference to this document.

Question 82: Is it clear when a review of policies or the Plan may be necessary?

- 1.9 Beyond setting out the individual indicators, the text in Chapter does not make it clear when a review of the policies and plan is needed and we suggest this is updated in line with paragraph 1.8 of the Housing White Paper which states:

"We will set out in regulations a requirement for these documents to be reviewed at least once every five years".

- 1.10 This review period is particularly relevant in Fylde and may even need to be brought forward to take account of Wyre's unmet need once a final figure is confirmed.