

Matter 12

Issue 12: Is the monitoring framework of the Plan effective and consistent with national policy?

Implementation and monitoring

1. *Is the proposed Monitoring Framework set out in document HO14 appropriate and robust?*

- 1.1. The HBF considers that the Monitoring Framework should be included within the Plan. The proposed framework currently includes the policy, monitoring indicators, targets and a data source. However, the Plan does not set out what happens if the targets are not met, or how frequently or how persistently or significantly the targets not being met would mean that action should be taken. The HBF considers therefore that it would be appropriate for the Monitoring Framework to include triggers eg if the target is not met for 3 years, or if less than 50% of the target is not met, along with an action, in order to address this issue. So for example in relation to the provision of affordable housing the Monitoring Framework suggests that the target is to meet the affordable housing needs of the Borough, it currently does not set a figure, this would need to be included, but a trigger could be that the average delivery over a three year does not meet this target, and if that happened that Council would look again at the viability of development, or seek to allocate more sites, or seek to work with Homes England, or seek to work with Registered Providers or work to bring in more funding etc etc. Without clear targets, triggers and actions, it is not clear how the Council would actually use their monitoring framework to determine if the Plan is delivering or to determine how any issues can and will be addressed.

2. *Are the proposed indicators and targets appropriate and measurable? Are any others necessary for monitoring to ensure the soundness of the Plan?*

- 2.1. The HBF considers that there needs to be additional indicators and targets, particularly in relation to housing delivery, where there appears to be limited monitoring in terms of the number of homes, the size and types of homes, the location of homes, the types of sites brought forward, the five year housing land supply etc. The HBF also considers that the proposed indicators and targets are not measurable as set out above, as limited target numbers or timescales are provided. The HBF would continue to recommend that not only should targets be included there should also be triggers and actions. In terms of housing such triggers for action could include the lack of a five-year supply or delivery which is below the anticipated housing trajectory, potential actions could include working with developers, producing masterplans, allocating further sites, reducing Local Plan requirements or preparing a new Local Plan.

