HBF House, 27 Broadwall,
London SE1 9PL
info@hbf.co.uk
hbf.co.uk

Chris Martin – Homes Builders Federation (HBF)
Oldham Local Plan Examination
Matters, Issues and Questions – Matter 12

Matter 12 – Monitoring

Issue 16: Does the Plan set out a positively prepared strategy for monitoring which is justified, effective and consistent with national policy?

Q10.19 Is the plan sufficiently clear as to how its implementation will be monitored? Would the indicators selected provide an effective mechanism for monitoring the performance of the Plan?

1. The Monitoring Framework of the Local Plan provides a selection of indicators and monitoring targets to monitor the performance of the policies. These are outlined after each section of the plan. There is also a Local Plan Monitoring Indicators table associated with Policy M1 (Table M1). Table M1 itself seeks to monitor indicators against the Integrated Assessment objectives rather than specifically the policies of the Local Plan. It is therefore unclear on what basis the Local Plan is being monitored. For monitoring to be effective, this requires clarity from the Council who should seek to consolidate monitoring into a single section of the Local Plan (referring to relevant policies), rather than having monitoring indicators at the end of each section.

2. Irrespective of this, the Monitoring Framework also needs to be more precise in terms of data sources for the indicators identified (ie. specifically, where the data is to be found) and needs to be more definitive in terms of actions; identifying when, why and how actions will be taken to address any issues identified. Currently, Policy M1 is vague in terms of actions which are imprecise and heavily caveated (using 'may' instead of 'will'). This requires further explanation to ensure effectiveness and to allow the plan to be positively prepared.

Q10.20 Is Policy M1 necessary for monitoring purposes, and therefore is it justified and effective?

3. The HBF considers that Policy M1 is not necessary but only on the basis that the Monitoring Framework is set out in a comprehensive and complete way. This should be in the form of a table clearly outlining policies, indicators, sources, targets and any remedial actions that are needed if a policy is not achieving the target.

4. It should then be the role of the Annual Monitoring Report (AMR) to publish progress against the Monitoring Framework on a yearly basis.

5. It is also noted that Policy M1 refers to the potential future preparation of Supplementary Planning Documents (SPDs). Given that SPDs can no longer be produced, this part of Policy M1 needs to be deleted.