



**DAVENTRY DISTRICT SETTLEMENTS AND COUNTRYSIDE
LOCAL PLAN EXAMINATION**

**STATEMENT ON BEHALF OF:
L & Q ESTATES LIMITED**

MATTER 9: Monitoring

Pegasus Group
4 The Courtyard
Church Street
Lockington
Derbyshire
DE74 2SL

Telephone: (01509) 670806 Facsimile: (01509) 672247

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MATTER 9: Monitoring

Issue:

Whether the Plan would be able to be monitored effectively to ensure timely delivery of its proposals in conformity with the JCS?

Questions

1. *How would the implementation of the Plan policies be achieved? What mechanisms are there to assist development sites to come forward/progress?*
2. *How would the implementation of the Plan be monitored? Would it be effective? How would the results of monitoring be acted upon, for example what would trigger a review of the Plan?*
- 9.1 Appendix A to the Part 2 Local Plan sets out the proposed monitoring framework. For Objective 9 of the plan, to provide a range of housing in sustainable locations to ensure all residents have access to a home that they can afford, the proposed monitoring framework solely proposes to monitor progress towards the delivery of the three additional housing sites proposed for allocation under policies HO1, HO2 and HO4.
- 9.2 As framed, this proposed monitoring framework is deficient in not providing an assessment of how Daventry District is meeting its housing requirements in accordance with the JCS. It is not robust to only monitor delivery from 3 sites. In our submissions on Matters 2 and 3, we have highlighted issues relating to the approach the Part 2 plan has taken to considering only the housing requirements relating to Daventry Town and the Rural Areas, and not considering the requirements for the whole District including the NRDA as set out in the JCS.
- 9.3 For the JCS, Appendix 6 sets out the monitoring framework including monitoring plan period targets, five-year supply and annual targets. The Inspector in his report on the Examination, emphasised the importance of monitoring given the challenging new housing targets. He also noted that each constituent authority is individually responsible for its own five-year housing land requirement (para 198, Inspector's Report, JCS).
- 9.4 It is the responsibility of Daventry District Council to monitor delivery of its full housing requirement in accordance with Policy S3 of the JCS which requires the delivery of 12,730 dwellings over the plan period.

- 9.5 The approach of the Part 2 Plan to exclude consideration of the NRDA area and the need to address shortfalls and the limited approach to monitoring proposed means that the plan will not be effective in ensuring that the housing requirements for the District are delivered in accordance with the JCS.
- 9.6 The Part 2 Plan should consider the requirements for the whole district, including the NRDA and the monitoring framework should assess delivery against the overall district housing requirement and the below district housing provision within Daventry Town, the Rural Areas and the NRDA.
- 9.7 The monitoring framework as framed refers to a trigger of +/- 25% against a rolling 3-year period for the three additional housing allocations proposed to be monitored. Contingencies referred to include working with developers to develop viable schemes, review the trajectory, considering the barriers to implementation and considering a review of policy.
- 9.8 This approach does not provide a sufficiently clear guide on the actions the Council would take in the event of shortfalls in delivery. Other authorities have included policies that clearly set out trigger mechanisms and timings for a review of the plan if there is a shortfall in housing delivery. As outlined in our other Matters Statements, the Council should also consider the allocation of additional sites to provide flexibility or alternatively reserve sites with clear guidance on their release when monitoring reveals shortfalls in delivery.