

Chapter 9: Implementation and Monitoring

Matter 9; 9/1, 9/2

Policies None

Introduction

9.1 In this Chapter, the Panel's attention turns mainly to the form and content of the draft RSS Implementation Plan. We consider in particular the arrangements proposed for bringing forward development and infrastructure and for monitoring the achievements and effectiveness of the draft RSS policies and proposals. We also consider whether there are any consequential implications for draft RSS itself.

Background

9.2 The requirement for an Implementation Plan, which may be incorporated within draft RSS or produced as a separate document, is set out in Chapter 3 of PPS11. This says that for each policy and priority proposal, the Implementation Plan should set out which organisation(s) are responsible for delivery, the current status of the proposal and the timescales for the key actions to deliver the policy, including any output targets. Purposes of the Implementation Plan include setting priorities, focussing action and informing both lower order strategies and the plans and programmes of national delivery agencies, such as the Highways Agency. An Annual Monitoring Report (AMR) is also to be produced¹ for the purposes, among other things, of recording contextual changes and measuring the performance of the various policies and proposals against them. This, however, is a free-standing document related to both RSS and the Implementation Plan but not part of either.

Issues

9.3 The Panel considered two main groups of issues:

Delivery and infrastructure

- Timelines for LDD formulation;
- Distinction between strategic and non-strategic infrastructure;
- Guidance on phasing;
- Clarity on cross-boundary infrastructure funding;

Implementation and monitoring

- Requirements of Policy MON1 of RPG10;
- Measurement of ecological footprint and sustainable communities;
- Expression of targets against baselines;
- Trigger points for remedial action.

¹ As required by Regulation 5 of *The Town and Country Planning (Regional Planning) (England) Regulations 2004*.

Overview of the document:

- 9.4 As allowed for in PPS11, SWRA has produced the Implementation Plan as a “stand alone” document, bound separately from draft RSS. Paragraph 1.1.4 of the Implementation Plan says it will not be a static document and will continue to evolve alongside draft RSS as it moves towards formal approval. Paragraph 1.4.1 further intimates that, after approval of RSS, it will thereafter be reviewed annually (although tri-annually was suggested at the Examination). It also has no policy content in its own right. For all of these reasons, the Panel does not regard the draft RSS Implementation Plan as a document that is intended to become an integral part of the statutory development plan framework for the Region. Rather, it is presented to us as a “work in progress” which will support draft RSS and both inform, and be informed by, the Annual Monitoring Report (AMR). In that context, we see it as a welcome addition to the overall process of regional planning and the delivery of successful outcomes, particularly of the broad objectives listed in paragraph 1.3.1 of draft RSS.
- 9.5 It follows, however, that while we have commented on its broad content and structure, we have not commented directly on the various errata and corrections to the Implementation Plan advanced by SWRA², which we regard as part of the ongoing process of in-house editing and revision. We have also confined our recommendations on the Implementation Plan to a small number of areas where we consider that delivery mechanisms could be more sharply focussed, rather than matters of detail.

Delivery and infrastructure

Timelines for LDD formulation

- 9.6 A main concern of the private sector in responding to increased levels of development proposed in draft RSS is to avoid delays arising within the planning process. However, much of draft RSS is effectively concerned with establishing the appropriate quantum, distribution and future directions of growth, whether at the SSCTs or in the wider Housing Market Areas, as a preliminary to more detailed site selection at LDF level. Such site selection is necessarily a plan-led process, as required by PPS1 in the interests of lending certainty and transparency to the system, ensuring potential obstacles to development are identified and resolved at an early stage and enabling service providers to plan for the funding and provision of requisite supporting infrastructure. Particularly where sizeable urban extensions are involved, this may be expected to be both a complex and somewhat time consuming exercise, but is also necessary if well-designed sustainable communities are to be the result.
- 9.7 The Panel accepts, however, that it is essential to have a clear programme for ensuring the necessary preparatory work is carried out expeditiously and that Local Development Documents are brought forward in timely fashion. We consider the particular problems of doing so in areas where joint working is necessary under Policy J of draft RSS in Chapter 3 of this Report. However, it is apparent from Appendix 1 to the draft RSS Implementation Plan that, both in such places and elsewhere, and well into the draft RSS period, only a few approved Local Development Schemes (LDSs) have yet begun to absorb this imperative. LDSs are expected to establish the programme of plan-making some 3-5 years ahead. Proposals for Plymouth and South Hams are well advanced but Bristol, as far as we are

² *Errata and Corrections to Draft Regional Spatial Strategy Documents*, 16 January 2007.

aware, for example, has only a City Centre Area Action Plan in its recently approved LDS (for adoption in 2009), and nothing as yet to lead South Bristol regeneration, let alone for urban expansion. As matters currently stand, it will already be some years into the RSS period before some necessary planning work even commences.

- 9.8 That said, the Panel is aware that draft RSS, with or without our recommended modifications, will place a significant and enduring burden of work upon many of the Region's Local Planning Authorities, particularly those who will be required to engage with several urban extensions in or adjacent to their own administrative areas. Bristol, in particular, will have direct or indirect involvement in 5 urban extensions if all of the Panel's recommendations are adopted³, quite apart from progressing continued regeneration of the City's existing urban area on other fronts than South Bristol alone. As paragraph 2.4.3 of the Implementation Plan implies, there may also be a number of other reasons why draft RSS proposals for the sub-Regions may not progress as quickly as desired.
- 9.9 However, innovative approaches are possible. These might include partnership working with the private sector, and/or the preparation of Area Action Plans in parallel with Core Strategies, or proceeding directly to Area Action Plans and master planning on the basis of approved RSS alone. Representatives of the development industry suggested the formation of dedicated "delivery teams", with private sector involvement, to progress development more expeditiously than Local Planning Authorities might otherwise be able to manage themselves. The Panel neither supports nor opposes such arrangements, since circumstances will vary from case to case. However, we see no insurmountable problem of probity in this respect, because publicity and consultation arrangements would be governed by the Councils' adopted Statements of Community Involvement, while the Local Planning Authorities would retain the power to accept or reject recommendations of a "delivery team" through normal democratic processes. The alternative of large scale schemes being initiated through the development control process independently by the private sector, and thus pre-empting the plan-led process of site selection within the Areas of Search, is hardly likely to be more attractive.
- 9.10 It is therefore the Panel's view that the Implementation Plan has a crucial role to play in ensuring the plan-led system operates effectively, co-ordinating work programmes across LPA boundaries, providing an overview of the orderly progression of Local Development Schemes for SWRA and Government Office, and signalling the need for support or intervention to tackle problems of underperformance where necessary. Appendix 1 of the Implementation Plan has particular importance at the beginning of this process and should, in the Panel's view be informed by the incorporation of "time lines" for each area of search to establish the necessary targets against which performance can be monitored and kept under close review. We recommend accordingly.

Recommendation 9.1

- That the Implementation Plan include "time lines" showing the key stages and dates leading to the commencement of development within each of the "areas of search" for urban extensions identified in the Panel's Report and that the Plan-making aspects of these time lines be reflected in Appendix 1 of the Implementation Plan.

³ Areas of search A, B, C, D and Yate, for urban extensions.

Distinction between strategic and non-strategic infrastructure

- 9.11 In preparing the draft RSS, the Section 4(4) Authorities⁴ were invited to submit their views of strategic infrastructure requirements to facilitate potential levels of development⁵. For the most part, these requirements have been carried forward, with only relatively minor “filtering”, via the Section 4 Sub-regional statements into the tabulations in Section 2.4 of the Implementation Plan.
- 9.12 This process, while reasonably comprehensive, lacks transparency and has led to a fragmentary approach that obscures an overview of the infrastructure priorities for the Region as a whole. It has also created a degree of inconsistency in the sub-Regional content. For example, the Implementation Plan’s tabulation for policy SR4 (Bristol) mainly focuses on large-scale transport schemes, while that for policies SR15-SR18 (Exeter) includes projects of much smaller scale and more local significance, such as an additional recycling centre on the eastern edge of the City. A number of important schemes would appear to have been excluded⁶ no less arbitrarily.
- 9.13 Moreover, in draft RSS itself, references to infrastructure requirements are widely dispersed, variously in Inset Diagrams (such as inset Diagram 4.3), text (such as paragraph 4.2.39) and policy (such as policy TR5). Some (such as the reference in paragraph 7.3.4 to a need to strengthen the electricity grid to accommodate off-shore renewable electricity generation) attract no more than passing comment and, for whatever reason, have no mention in the Implementation Plan at all.
- 9.14 Much clearer exposition is required if Regional and sub-Regional strategic priorities are to be readily differentiated from each other and from locally generated “wish lists”. This is also essential if the key priorities are to be identified, action suitably focussed, and the funding programmes of important service providers influenced as PPS11 expects. Importantly, it is the Panel’s view that key infrastructure requirements should be more clearly expressed in draft RSS as policy, not text, nor relegated to the Implementation Plan.
- 9.15 In Chapter 5 of our Report we have identified key Regional transport investment priorities for inclusion in Regional Transport Strategy and given voice to them in our recommended policies TRANs6 and TRANs7A-H. While they require no further policy expression, it follows that the Implementation Plan should treat them in the same way as other DRSS policies and indicate (among other things) key actions, outcomes, lead organisations, partners, delivery mechanism, funding required and timescales/targets.
- 9.16 The appropriate place for policy expression of most other (non transport) infrastructure requirements is within the Section 4 sub-regional statements themselves. The starting point for doing so is the suite of key infrastructure paragraphs in draft RSS (paragraphs 4.2.13 – West of England, 4.2.31 – Swindon, 4.2.39 – Cheltenham and Gloucester, 4.2.53 – Exeter, 4.2.61 – Taunton/Bridgwater, 4.3.14 – South East Dorset, 4.4.10 – Plymouth, 4.4.17 - Torbay, and 4.4.24 – CPR). It seems to the Panel that there are priorities within these. We draw particular attention in Chapter 5 of this Report, where we comment on prioritisation on the basis of the Eddington concept of delivering “multiple benefits”. Thus, for example, the South Bristol Ring Road (paragraph 4.2.13 of the draft RSS) could be said to fall into the

⁴ Planning authorities as listed in Section 4(4) of the *Planning and Compulsory Purchase Act 2004*.

⁵ SWRA statement on Matter 9/1, paragraph B1.

⁶ *Regional Funding Allocations: Advice from the South West Region*.

category of key regional infrastructure because of its ability to make the Bristol conurbation operate more effectively (while potentially aiding regional connectivity by reducing local traffic off M4/M5), to support regeneration of South Bristol and to release development potential within Areas of Search A and B. Much the same might apply to complementary investment in the Greater Bristol Bus network.

- 9.17 Nonetheless, the range of projects cited in the various parts of draft RSS are both varied in scale and mixed in type. In the absence of any systematic evaluation by the promoters of these or other projects, the Panel has no way of assessing their relative practicality, priority, economic feasibility or social and environmental acceptability. Much more work needs to be done in this regard before policy can be formulated and timescales and mechanisms for delivery identified in the Implementation Plan. Our recommendations in Chapter 4 are thus concerned primarily with additions to text to remedy obvious infrastructure omissions that we have identified from the submissions before us, and we have no alternative but to leave detail to the Implementation Plan as work in progress.

Recommendation 9.2

- Present policies TRANs6 and TRANs7A-H in the Implementation Plan in the same way as other policies and indicate (among other things) key actions, outcomes, lead organisations, partners, delivery mechanism, funding required and timescales/targets.

Recommendation 9.3

- *Further work is required in the form of a systematic evaluation of infrastructure bids and priorities to inform infrastructure policy formulation and the related identification of timescales and delivery mechanisms in the Implementation Plan.*

Guidance on phasing

- 9.18 We have considered (in our Chapter 4 sub-regional appraisals) the need for phasing of greenfield development within the proposed areas of search relative to brownfield regeneration within the SSCTs, in those cases where it has been suggested. We have concluded that such phasing is unnecessary. This is because the two development streams serve different markets and, in all cases, there would be a large measure of natural phasing in any event. The latter point applies equally to phasing of development generally in draft RSS, because the bulk of housing delivery in the early part of the Plan period is likely to come from existing commitments, urban regeneration and other urban capacity sites. Conversely, responses to Panel Note 2⁷ indicate that construction of dwellings within the proposed areas of search (other than those where work is already well under way) would be unlikely to commence much before 2015 even if these preparatory stages begin straightaway. We do not therefore support phasing in this respect either.
- 9.19 Nonetheless, a number of participants expressed concern about the phasing of development relative to infrastructure provision. The Panel acknowledges an inherent difficulty in the

⁷ Panel Note 2, *Programming of Development Areas*.

RSS process of making direct connections between individual developments and the delivery of necessary infrastructure, because RSS is not site specific. This can have serious implications both in terms of development costs and timing where, for example, Highways Agency finds itself in the position of having to use Article 14 powers⁸ to object to development proposals because necessary road infrastructure has not been identified sufficiently well in advance to be suitably planned for and committed, yet has considerable lead-in times.

- 9.20 Nonetheless, in places like Swindon East, where development anywhere within the recommended area of search G is likely to require new crossings of A419, and in Bristol where timing of construction of sections of the South Bristol Ring Road is crucial to the orderly release of sites within the areas of search A and B, availability of funding is likely to be determinative of phasing rather than a phasing policy in itself. Such matters would more appropriately be identified in infrastructure policy as we have identified in the preceding issue, and costed, prioritised and planned for accordingly.
- 9.21 For these and for other transport infrastructure requirements, Government Office informed the Examination that the Good Practice Guide for Regional Transport Strategies advises that funding priorities be established in blocks of 2, 3 or 5 years. Given that is so, and in the light of our finding that further work is necessary on non-transport infrastructure requirements, the Panel need do no more than welcome the SWRA intention to keep the Implementation Plan under frequent review.

Clarity on cross-boundary infrastructure funding

- 9.22 The Panel fully understands the concern of the Local Planning Authorities to avoid commitments to development, especially in the various areas of search, without funding mechanisms to ensure delivery of necessary local as well as regional infrastructure first being in place. It is clear from the work undertaken so far by the Section 4(4) Authorities that infrastructure requirements will be of widely varying scale and type and that the cumulative cost is likely to be considerable⁹. Draft RSS paragraphs 3.6.5- 3.6.8 and Development Policy D refer to these concerns and the measures proposed to address them. To the extent that there will be reliance on funding from Central Government, considerable uncertainties nevertheless remain. These include the nature and amount of future funding for the New Growth Points¹⁰ and the size of the Regional Funding Allocation (both of which are subject to Government spending review), together with the level of support for the innovative Regional Infrastructure Fund which is being jointly advanced with the South East England Regional Assembly to forward fund projects¹¹. Future reforms of the planning system, notably with regard to the prospect of the introduction of some new form of development charge, are also likely to have an impact on development-led funding. In this latter connection, the Panel is aware that some Local Planning Authorities in the Region are only now gearing up to the production of SPD on developer contributions, which may have a particular bearing on affordable housing provision (this having been identified as one of the greatest potential calls on expenditure).
- 9.23 A particular complexity arises where cross-boundary funding is required. This applies equally with reference to developer contributions for individual schemes and to cross

⁸ *Town and Country Planning (General Development Procedure) Order 1995*.

⁹ See, for example, Statement on Matter 9/1 by South West Strategic Authorities (SE).

¹⁰ SWRA statement on Matter 9/1, appendix 2.

¹¹ SWRDA statement on Matter 9/1, appended "*Regional Infrastructure Funds: A Prospectus*".

regional issues. There can be no fixed formula in such cases, because of the diversity both of their funding needs and their potential funding sources. Paragraph 3.6.7 refers to possibilities of pooling of contributions between Authorities across areas and the establishment of consortia and development companies with private sector partners. No doubt other approaches will be devised to address particular circumstances.

- 9.24 Whatever the case may be, RSS cannot guarantee funding, it can only put in place suitable mechanisms to identify needs and priorities for such funding as becomes available. Policy D and the further work that we have recommended above do that. The Panel is firmly of the view that it would be wrong to promote a counsel for perfection with regard to infrastructure funding as a reason to delay the start of work on planning for the delivery of much needed housing and other development for the region as a whole. The scale of the task facing the region demands nothing less than for the process to begin positively and without prevarication.

Implementation and Monitoring

Requirements of Policy MON1 of RPG10

- 9.25 Policy MON 1 requires the Regional Planning Body to consider and agree with the Government Office and other regional partners the arrangements for monitoring, and to prepare and issue a Technical Manual setting out the form and frequency for data collection. Paragraph 1.3.27 of the draft Implementation Plan indicates work on first of these matters is still in progress. With regard to second, a monitoring manual has been produced to deal with technical requirements and notably includes provision for on-line data collection.
- 9.26 Comprehensive annual monitoring reports have now been produced for some years by SWRA, and Government Office regards these as a “brand leader” among the regions. Although largely in accord with the advice in the *Good Practice Guide*¹², the range of data capture will need to be reviewed to reflect differences in policy framework between RPG10 and draft RSS (as approved) and to reflect the requirements of PPS3 and PPS11. A Strategic Information Providers Group has been set up involving the respective LPAs to take this work forward.
- 9.27 Although the Panel heard some criticism that the monitoring process was too inward looking, as paragraph 1.3.23 of the Implementation Plan makes clear the AMR is not the only source of information on contextual changes that may be taking place. The Regional Observatory provides statistics too, for example, as does the Highways Agency in the form of published reports. There is some scope for engaging more with other stakeholders who may have useful inputs, such as the Home Builders’ Federation and amenity bodies, but there is also a need to avoid the process of monitoring and compilation of the AMR becoming over-burdened with consultation and procedural complexity. The Panel understands that there may be some scope for wider contributions to be advanced through what SWRA refer to as a proposed “interface document”. We are content that arrangements are progressing satisfactorily.

¹² *Regional Spatial Strategy Monitoring: A Good Practice Guide*, published by ODPM in 2005.

Measurement of ecological footprint and sustainable communities

- 9.28 There was debate on the extent to which it is possible to measure broad concepts like ecological footprint and the development of sustainable communities for monitoring purposes. Such concepts are expressed in Policies SD1, SD3 and SD4 (among others), where the Implementation Plan refers to the establishment of measurable targets simply as being “on-going”. The Panel accepts, however, that these policies are themselves “broad-brush” with detail picked up and expressed more specifically in later policies such as those in Section 4 of draft RSS. Again, the proposed “Interface Document” may help ensure uniformity of data capture among contributors to the AMR. We were also told that SWRA is working with partners on arrangements for “bundling” indicators together in various groupings that might allow for at least some empirical measurement. Such approaches will be necessary as the AMR moves away from the RPG10 topic-based format and becomes increasingly focussed on objectives and outcomes. The Panel acknowledges the complexity of the subject and is content that due efforts are being made to comply with Good Practice Guide recommendations.

Expression of targets against baselines

- 9.29 Concern was expressed to the Panel that the AMR does not provide sufficient information to enable the effectiveness of the draft RSS in delivering progress towards policy objectives to be clearly identified. We are aware that measurement of progress requires a fixed starting point and a consistent stream of data over a lengthy period. This is difficult to achieve at the outset of the new policy regime that will be established on approval of draft RSS, because many of the baselines will be different from those under RPG10, and data collection in such instances will have to be started afresh. The Good Practice Guide requires both contextual and core indicators to be identified and monitored and we understand that SWRA is considering the production of carbon trajectories, as well as using a trajectory based approach for matters such as the degree of urbanisation that draft RSS policies are delivering. In Chapter 7 of this Report, we have also suggested the adoption of a trajectory approach for measuring performance on renewables. The AMR has been produced now for some 5 years or so and is likely to continue to evolve organically and become more refined as time goes by. We find no reason to intervene in this process.

Trigger points for remedial action

- 9.30 Some participants wanted to see the inclusion of “trigger points” in the Implementation Plan, so that should certain targets not be met – such as an insufficient delivery of affordable housing – a prescribed remedial action would be swiftly and automatically initiated. This, as it was expressed to the Panel, would better reflect a “plan, monitor and manage” approach than what might otherwise become the alternative of “wait and see”. The Panel is not convinced, however that suitable remedial action can be pre-determined in this way, because under-performance may be caused by a number of factors which precipitate action might exacerbate rather than resolve. Arbitrarily altering an affordable housing threshold, for example, could make provision less economic and thus reduce supply rather than increase it. At the extreme, it might be wrong to initiate a partial or wholesale review of draft RSS simply because a single indicator had temporarily slipped. We are more persuaded to the view that the outcomes of monitoring need a considered response, tailored to the particular circumstances concerned.

9.31 In sum, we find no reason to recommend modification of draft RSS in response to any of these points, and acknowledge that “work in progress” on the Implementation Plan is travelling in a suitable direction. We make no recommendation on the AMR as this is outside our remit and, even so, find no reason to do so.