

Chapter 13 Implementation and Monitoring

Scope and Framework for the Future Development of Devon

Matter DSP8/1; Chapter 7

13.1 One reason that we added this matter into the programme was to enable us at the end of the examination to clarify any points that had come up in the preceding matters. In the event, this item of the programme was not at the very end but there was nevertheless discussion on some important questions under this heading. These were:

- does the plan provide a clear framework for the county's local plans?
- to what extent will the plan be complementary to the range of community plans now being developed in Devon?
- is the scope and content of the plan appropriate in the context of changes to the planning system now before Parliament?

13.2 In Chapter 2 we comment on the importance of having in the plan a clear but simple exposition of the underlying high level policy aims (whatever they may be called). We cannot overemphasise our view that it is these aims that those concerned with the implementation of the plan should strive towards and those monitoring it should observe.

13.3 We also asked, both in this Matter and also from time to time throughout the examination, how the plan could inform a new generation of regional spatial strategies and related sub regional policy. Our conclusions in this regard are reported in our "overview" in Chapter 1 as elsewhere in the report.

The structure plan and local plans

13.4 The principle of subsidiarity, as set out in PPG12¹, requires that the plan should concentrate on setting the strategic framework for local plans rather than containing in itself detailed or development control policies. It is acknowledged by its makers that the plan is more detailed than the currently adopted structure plan². Should it therefore be simplified?³

¹ PPG12 at Chapter 3.

² Joint Structure Plan Authorities' statement.

³ As is suggested by the statement of Plymouth City Council, and some district councils.

13.5 Without doubt, having regard to national policy, detailed development control policies have no place in this plan. Elsewhere in this report we have recommended the excision of development control policies unless it is beyond rational contradiction that they are fundamental to the general strategy. We recognise, however, that the demands of RPG 10 for a sea change in spatial strategy must be accurately reflected in the direction given to the spatial policy of local plans. It is clear to us from many of the comments made at the examination that the district councils are far from being wholly in sympathy with regional strategy but rather were utterly left out of its formulation⁴. It is therefore an unfortunate fact of life given the present system of cascading central policy that such direction is necessary.

13.6 It is also unfortunate that too many of the planning questions in Devon overlap local government boundaries. This is true of questions in the sub regions of Plymouth, Exeter, Torbay/South Devon and northern Devon. We suggested in discussion that the plan in respect of these areas should be pared down to its fundamental policy, and then added to by strategic supplementary planning guidance, as we learned had happened in Hampshire. But this suggestion fell on very stony ground⁵ and we did not pursue it. Rather, we recognise the urgency of the key spatial decisions in these areas and agree with their inclusion in the plan⁶.

The structure plan and community strategies

13.7 There are eleven local strategic partnerships⁷ in Devon, nine of which have published community plans. The degree to which the structure plan complements these community plans varies, although, like the structure plan, the “vision” and strategy of some of the community plans takes forward elements of RPG 10⁸.

13.8 On an optimistic view, there is scope to bring development plans and community strategies closer together as each is rolled forward and developed further. At least at the present time there are no obvious worries about lack of consistency⁹. Nevertheless, it is clear to us that there are long term problems in the relationship between community strategies and development plans that need to be addressed at all levels, from central government through to all sorts of local authority.

⁴ As a pointed comment by Mr L Bray on behalf of the South Hams District Council testified.

⁵ Matthew 13:5.

⁶ Oral evidence of Mr Bray, Mr J Bell for Plymouth City Council, Ms C Muston for the House Builders Federation and others.

⁷ As recommended in paragraphs 24-31 of ODPM (undated) *Preparing community strategies: government guidance to local authorities*.

⁸ Joint Structure Planning Authorities’ statement, also oral evidence of Mr E Chorlton on behalf of the authorities.

⁹ *Ibid*, also Mr Chorlton’s oral evidence.

13.9 A central aim of preparing a community strategy is to ensure that the activities of the various bodies who provide services to the public are better co-ordinated. Underpinning the preparation of strategies is local self-determination and the aspirations, needs and priorities of local communities¹⁰. But as we have noted, local choice can be at variance with regional strategy, as we have already noted in the field of affordable housing¹¹. That this problem is recognised by Government is indicated by a requirement for those preparing community strategies to “involve” (whatever that means) Government Offices for the Regions¹². No doubt many rough edges can be rubbed off clashes of local and national policy in this process, but in our view it is being too optimistic to assume that agreeable helpings of fudge can be concocted in every case where policy aims are diametrically opposed. As one district planner put it: “Top-down or bottom-up — you have to choose!”¹³ However, we share the view that to date this problem has not yet surfaced, perhaps because the Government Office for the South West has yet to be consulted on any of the community strategies¹⁴.

13.10 Another, less intractable but equally important problem that we have noted is that the land use implications of the aspirations, needs and priorities of Devon’s local communities often take expression crossing district boundaries. For example, as we have seen¹⁵, the housing needs of both Plymouth and Exeter can be met only through the development of land in adjacent districts. Fortunately, even though the plan is not in all cases supported by the immediate local communities, the county council has been involved in the preparation of the community strategy of each of the county districts and the structure plan’s proposals in each case are supported by the relevant district councils. Unlike the provisions of development plans, there are no set procedures for the resolution of disputes in the field of community strategy. Inevitably, therefore, in the long term there are bound to be inconsistencies between development plans and community strategies, even if they have yet to emerge.

The plan and changes to the planning system

13.11 In view of the impending changes to the planning system we asked whether the scope and content of the plan was appropriate in that context and would sensibly inform future regional spatial strategy and sub regional policy.

13.12 One reason that the joint authorities are keen on getting the present plan adopted is to put in place a strategic framework for Devon to help both the review

¹⁰ *Preparing community strategies*, paragraphs 6, 10 and 12.

¹¹ Chapter 3.

¹² *Preparing community strategies*, paragraphs 39 and 41.

¹³ Mr A Page on behalf of Teignbridge District Council.

¹⁴ Oral evidence of Mr R Ormerod of the Government Office for the South West.

¹⁵ In Chapters 8 and 11.

of the regional strategy and the emergence of local development frameworks. To a large extent these documents will be based on the same research and data¹⁶.

13.13 An appendix to the Joint Structure Planning Authorities' statement clearly indicates that considerable thought has already been given to the transitional arrangements. We heard nothing that would sap our confidence in this document. Updated if necessary, it could serve a useful informative purpose if it were to be attached to the plan on its adoption.

13.14 It is clear to us both from this appendix, and from what we have heard throughout the examination, that the termination of a county level plan in Devon will leave an important gap in strategic coverage between the regional and the unitary/district authority levels. This point has particular validity in the sub regions of Plymouth, Exeter and Torbay/South Devon. In all these areas concerted sub regional planning will be essential to secure satisfactory coordination in the fields of housing, employment and transport, and in their monitoring. In northern Devon, where there are cross boundary issues concerning the relationship between Bideford and Barnstaple a possible solution will be a joint local development document covering the issues of mutual concern.

Monitoring

Matters DSP1/1 and DSP8/2; Chapter 7

13.15 It became clear from the discussion, if we had not known it before, that there is more than one school of thought in the business of monitoring. On the one hand are those who would have attached to every policy one or more (often many more) indicators or targets which can readily be related to available or specially collected data. The Surrey Structure Plan¹⁷ was quoted as an exemplar of this approach. A similar approach is taken in a recent ODPM publication¹⁸ based on work by ECOTEC consultants.

13.16 The authors of the plan, however, do not appear to be of this school, eschewing the production of lists of either indicators or targets. Instead, they prefer a "plan, monitor and manage" approach throughout the plan process. In this approach, the authorities aim to:

- assess the extent to which the plan is being implemented;
- evaluate whether the plan is effective; and

¹⁶ Joint Structure Planning Authorities' statement, also Mr Chorlton's oral evidence.

¹⁷ Deposit draft of December 2002, quoted by Exeter City Council. Plymouth City Council took a similar line. (Statements of both authorities.)

¹⁸ *Monitoring Regional Planning Guidance — Good Practice Guidance on targets and indicators.* ODPM November 2002

- identify those external factors that are outside the scope of the plan but have a bearing on its successful implementation¹⁹.

13.17 With some reservations, we support this approach over the more mechanistic approach of indicators and targets. In the first place, the primary engine of monitoring in the region is the Regional Assembly. Commended by ODPM, the Assembly has a monitoring regime which includes a comprehensive list of indicators and draft targets. Local authorities are the main data source, working together through their Strategic Information Providers' Group building on local networks such as that in Devon and using an online questionnaire system. The system enables local authorities to view and review their own data, as well as that of other authorities in the region on a dedicated website (www.swrpm.org.uk). The website is part of the Assembly's support for the Regional Observatory, a wider intelligence and research resource for the region²⁰.

13.18 We agree with the authorities that it is important to avoid duplication of effort in this field. It does not seem to us a matter of great moment that the plan eschews indicators and targets. Too much attention, in our opinion, can be placed on targets anyway. Sometimes, indicators may be of the "canary in the mine" character²¹, especially in the environmental field, but at most their achievement or otherwise should be seen as no more than information on which decisions may, if appropriate, be based. To go further, and treat targets as objectives in their own right is, in our opinion, useful only if in themselves the targets accurately encapsulate every aspect of the primary objective, whatever that might be. This ideal situation, as we see it, is not at all likely in such a complex field as town and country planning²².

13.19 The answer, in our view is the intelligent use of the data, and we commend the proposed quarterly monitoring reports which will give an account of progress (or otherwise) toward the plan's high level policy aims. If necessary these could lead to *ad hoc* studies of particularly pressing matters and ultimately to a review of the plan. We were assured that these reports would be accessible to the public. This in our opinion, is an important consideration.

¹⁹ Deposit draft p.88.

²⁰ Joint Structure Planning Authorities' statement, also oral evidence of Mr M Palmer on behalf of the joint authorities and *Monitoring Regional Planning Guidance* paragraph 2.10.

²¹ To use Mr Ormerod's graphic analogy.

²² We recall that one of the principal reasons for the failure of the Soviet *Gosplan* system in the 1980s was both the failure of its targeting system to recognise the subtleties of consumer choice and also the propensity of managers throughout the system to cheat on their targets and abuse the system generally. This ought to be a lesson to all in this country who put their faith in systems of indicators and targets rather than the achievement of their basic aims. See, for example (among a very wide and erudite literature) Mark Galeotti's easily readable "*Gorbachev and his revolution*", MacMillan, London and Basingstoke 1997.

13.20 All the areas of policy in the plan need careful monitoring, but perhaps none more than matters pertaining to rural policy. Not only do we expect the rural areas to be the seat of the greatest changes in the next decade or so, we cannot avoid the view that the rural areas will also present some of the most intractable planning problems and conflicts.

13.21 A further matter of concern is that monitoring must be followed up by *managing*. This was a particular concern of the housebuilders who feared that the emphasis in the plan on urban containment and the re-use of previously used land could damage the delivery of the housing objective if the supply of such land did not come forward as planned²³. The opposite side of this coin, of course, is that the greenfield land supply could turn out to be excessive if the demand for housing were not forthcoming as projected. For the most part we see managing in this context as being a matter for the development control authorities, but there is a wider strategic aspect if the structure plan itself is found to be wanting one way or the other. A commitment to early review of the relevant policies of the plan is therefore desirable.

Recommendation 13.1

Modify the plan to:

- (i) clarify the relationship between its high level policy aims and its policies and proposals;
- (ii) express a policy commitment to plan, monitor and manage;
- (iii) make monitoring reports accessible to the public; and
- (iv) give a commitment to an early review of the plan where emerging circumstances indicate that the high level policy aims are unlikely to be fulfilled.

²³ Statement by the House Builders Federation and Ms Muston's oral evidence.