

Michael McGibbon

From: Liam Ward <[REDACTED]>
Sent: 18 April 2019 08:37
To: DevelopmentPlan@midulstercouncil.org
Subject: Representation - WD5 - Housing evidence
Attachments: WD 5 - Housing Evidence.pdf

Sirs,
See representation to DPS attached

Regards,

Liam Ward



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Submission of a Representation to Mid Ulster District Council Local Development Plan 2030 - Draft Plan Strategy



Comhairle Ceantair
Lár Uladh
Mid Ulster
District Council

Local Development Plan
Representation Form
Draft Plan Strategy

Ref:
Date Received:
(For official use only)

Name of the Development Plan Document (DPD) to which this representation relates

Draft Plan Strategy & background papers

Representations must be submitted by 4pm on 19th April 2019 to:

Mid Ulster District Council Planning Department
50 Ballyronan Road
Magherafelt
BT45 6EN

Or by email to developmentplan@midulstercouncil.org

Please complete separate form for each representation.

SECTION A

1. Personal Details

2. Agent Details (if applicable)

Title

Mr

First Name

Liam

Last Name

Ward

Job Title

(where relevant)

Organisation

(where relevant)

Ward Design

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Line 2	Castledawson	
Line 3		
Line 4		
Post Code	BT45 8AB	
Telephone Number	028 7946 9000	
E-mail Address		

SECTION B

Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

3. To which part of the DPD does your representation relate?

- (i) Paragraph _____
- (ii) Objective Housing allocation
- (iii) Growth Strategy/
Spatial Planning Framework Evidence base for Housing Local indicators and Committed Units not robust
- (iv) Policy _____
- (v) Proposals Map _____
- (vi) Site Location _____

4(a). Do you consider the development plan document (DPD) is:

Sound Unsound

4(b). If you consider the DPD to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6 (available on the Planning Portal Website at <https://www.planning.gov.uk/index/advice/practice-notes/development-plan-practice-note-06-soundness-version-2-may-2017-2a.pdf>).

Soundness Test No.

CE 2

5. Please give details of why you consider the DPD to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

If you consider the DPD to be sound and wish to support the DPD, please set out your comments below:

<p><i>(If not submitting online and additional space is required, please continue on a separate sheet)</i></p>
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6. If you consider the DPD to be unsound, please provide details of what change(s) you consider necessary to make the DPD sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. There will not be a subsequent opportunity to make a further submission based on your original representation. After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

See attached sheets

(If not submitting online and additional space is required, please continue on a separate sheet)

7. If you are seeking a change to the DPD, please indicate if you would like your representation to be dealt with by:

Written Representation

Oral Hearing

Please note that the Department will expect the independent examiner to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Signature:

Date:

18th April 2019

Committed Units and Housing Local Indicators – Coherence & Effectiveness

Soundness Test CE2: The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;

The Draft Plan Strategy considers the allocation of housing across the district, in part by comparing a set of Housing Local Indicators with Committed Units in settlements.

There is no definition in the DPS for “Committed Units”, making the use of that term opaque to most readers of the document.

The definition I was offered, after I had asked, was that Committed Units include all extant, but undeveloped housing within each settlement, and all land zoned for housing in extant development plans, which is not planning approved for development.

The Council’s housing monitor information is not published alongside the DPS, making it difficult for the public to understand what the extent of Committed Units is, and where those commitments are located.

I asked for, and was given that information in the form of maps and tables for each settlement. I am sorry to say that the information contained in those documents was inaccurate, and did not match the information presented in the DPS Appendix 1 tables. The extent of the errors included therein was enormous as a percentage of Committed Units.

A Draft Plan Strategy which relies on a flawed evidence base must be unsound.

What land is actually committed?

We accept that land with the benefit of a full planning approval is committed, today.

We accept that land with historic fulling planning approval, which has been implemented is committed.

When land in the two categories above is reviewed, there will be a significant difference between the quantum of land given planning approval and the numbers of new homes being completed. For various reasons some landowners will secure a planning approval, with no plan to complete housing on this land. There are numerous examples of protective planning approvals being secured across the district. Many of these approvals are by now 10-15 years old, without having delivered a single home. Not all of these lands should be considered likely to deliver homes during the plan period.

The DPS includes land zoned for housing, but not having a planning approval, as being committed. That is flawed. Each such field has been inside the development boundaries at least since the

middle 1980's, and has not yet delivered a home. For whatever reason, the landowners have decided not to see their land developed. These lands should be entirely discounted.

Plan Making & Review

A later stage in the Plan making process will see the policies and strategies adopted in a Plan Strategy applied to local plan policies, including land use policies. If the assumptions made about commitments are carried through into land use policy the Plan is likely to identify land for housing, which will not deliver housing at anything like the rate necessary to satisfy the district's need.

Plan Led System

Plan Monitor Manage, which is based on flawed information, and without adequate review mechanisms (possibly based on a similar information gathering process) will lead to reduced housing delivery. That reduced housing delivery might then be measured by the same team of planning officers as evidence of reducing need, and the review might reduce the supply still further.

The evidence base for plan making must be much more robust than that being offered in this DPS, and Housing Position Paper. Otherwise, the district is set for a spiral downward in the Plan Monitor Manage system.

First house in 2031

On which land might the first home to be occupied in 2031 (the year after this Plan's expiry) be built?

Each new home has a Lead-in period to delivery. This begins with identification of the land, and a negotiation between the owner and a developer. Then the developer must undertake a design process, and secure a planning approval. Following that approval sewers and roads will need to be bonded, and potentially infrastructure extended to the site. Then the construction of the first house begins. If the site is large, it might be another 5 years after construction commencement before the last house is completed. When added to the pre-construction period the lead in period for the last new home on a Committed zoned plot could be 6/7 years.

The use of HGI's as a cap, or indicator relates to the completion of homes, and ignores the lead-in period before the delivery of the last house on those indicators.

In order to deliver a 15 year supply of homes, it is necessary to include a 22 year supply of land.

This DPS anticipates that 18000 homes will be delivered during the 15 year Plan period, being 1200 per year. If the plan is to deal properly with the uninterrupted supply pipeline for subsequent years, additional land supply is needed. I argue that this additional supply should be 7 years, at 1200 per year.

No robust evidence base

The evidence of commitment in the DPS is not robust.

Firstly, it is not defined to the public at all.

Secondly, sites are recorded as committed where there is no planning history whatsoever. There is clearly no commitment

Sites with outline planning approval, or even full approvals at the measurement date (one snapshot in time rather than a continuing record) have now seen those approvals elapse.

Many of the “committed” sites have been approved for many years, without delivering homes.

The Housing Local Indicators take no account whatever of the continuing supply of land necessary to provide for an orderly transition to the period after the plan.

The strategy, policies and allocations are realistic and appropriate

Given the commentary above, we say that the strategy, policies and allocations are neither realistic nor appropriate, and are based on an evidence base which is lacking in robustness.

Changes Sought

The Draft Plan Strategy is founded, to a very significant degree, on statistics about the district’s existing housing, and levels of commitment, which are not accurate. These inaccuracies, if adopted within the final version of a Plan Strategy, would misguide makers of Local Plan Policy, undermine the Plan review process, and lead to outcomes which are harmful to the district.

Revisit the assessment of Committed Units

Include a category within that assessment which considers housing delivery on each site

Collate a more reasonable and realistic evidence base