

MAIN QUESTION

Name:

Michael Worthington

+ ADD TO ANALYSIS

Address

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+ ADD TO ANALYSIS

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BT1 6JH

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Email

michael@pragmaplanning.com

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Phone Number

No answer

+ ADD TO ANALYSIS

Are you responding as an individual?

No

+ ADD TO ANALYSIS

Are you responding on behalf of an organisation?

Yes

+ ADD TO ANALYSIS

Organisation and Job Title (if applicable):

Pragma Planning and Development Consultants Limited, Director

+ ADD TO ANALYSIS

Are you an Agent responding on behalf of a client?

Yes

+ ADD TO ANALYSIS

Client Name , address (if applicable):

No answer

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

Please indicate how you would like your representation to be dealt with at Independent Examination (please select one item only): Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.

Oral Hearing (Choose this procedure to present your representation orally at the public hearing) Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only.



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Soundness of the Plan

No

+ ADD TO ANALYSIS

If you believe the strategy is unsound, please indicate which tests of soundness it fails and provide your reasoning below.

C3, CE1, CE2, CE3, CE4

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Procedural Tests -

Yes

+ ADD TO ANALYSIS

Test P1 Comments

No answer

+ ADD TO ANALYSIS

P2 Has the Council prepared its Preferred Options Paper and taken into account any representations made?

Yes

+ ADD TO ANALYSIS

Test P2 Comments

No answer

+ ADD TO ANALYSIS

P3 Has the DPD been subject to Sustainability Appraisal including Strategic Environmental Appraisal?

Yes

+ ADD TO ANALYSIS

Test P3 Comments

No answer

+ ADD TO ANALYSIS

P4 Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD

Yes

+ ADD TO ANALYSIS

Test P4 Comments

No answer

+ ADD TO ANALYSIS

Consistency Tests

Yes

+ ADD TO ANALYSIS

Test C1 Comments

No answer

+ ADD TO ANALYSIS

C2 Did the Council take account of its Community Plan?

Yes

+ ADD TO ANALYSIS

Test C2 Comments

No answer

+ ADD TO ANALYSIS

C3 Did the Council take account of policy and guidance issued by the Department?

No

+ ADD TO ANALYSIS

Test C3 Comments

The Regional Development Strategy requires sustainable growth of settlements; adequate housing land supply, and balanced economic development. While the Draft Plan Strategy seeks to align with these objectives, failure to ensure deliverability of the housing requirement undermines alignment with regional housing growth objectives.

+ ADD TO ANALYSIS

C4 Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or any adjoining council's district?

No

+ ADD TO ANALYSIS

Test C4 Comments

It has not had regard to its own Food and Drink Destination Development Plan (2023–2027) or its Integrated Strategy for Tourism, Regeneration and Economic Development (2018–2030).

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Coherence and Effectiveness Tests

No

Test CE 1 Comments

The draft Plan does not adequately demonstrate how the proposed housing requirement of 15,608 dwellings will be delivered in practice in particular there is an unjustified overreliance on windfall allocation that has not been scrutinised in the context of the plan constraints and under the combined effect of these constraints will not be delivered at all. This renders the whole of the delivery strategy incoherent.

+ ADD TO ANALYSIS

CE 2 The Strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

No

+ ADD TO ANALYSIS

Test CE 2 Comments

The Plan has not sufficiently demonstrated that the housing trajectory is sound or that the windfall allowance is achievable under these cumulative constraints. There is an overreliance on windfall development and as a result there is a material risk of under-delivery that is compounded by restrictive HOU and ED policies as well as public infrastructure provision (which is a known constraint to which there is no answer), lack of flexibility in delivery mechanisms (in particular around the oversupply of employment land) and lack of monitoring provision.

+ ADD TO ANALYSIS

CE 3 There are clear mechanisms for implementation and monitoring?

No

+ ADD TO ANALYSIS

Test CE 3 Comments

There is insufficient clarity on the delivery of windfall development at the levels the plan predicts, on the availability of and timing around contingency measures when delivery inevitably falls below required levels.

+ ADD TO ANALYSIS

CE 4 It is reasonably flexible to enable it to deal with changing circumstances?

No

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

Test CE 4 Comments

The Plan has no flexibility built in to maintain housing delivery throughout the plan period. A situation which is highly peculiar given the potential capacity for flexibility provided by the massive oversupply of employment land in the Borough.

+ ADD TO ANALYSIS

If you consider the draft Plan Strategy to be unsound please provide details of changes you suggest to make the draft Plan Strategy sound.

Demonstrate that the projected windfall is based on realistic assumptions and sieved through the Council's own restrictive policies. If the projected windfall is demonstrated to be unrealistic the Plan should allocate additional lands to accommodate the proposed growth in population and resultant increase in number of dwellings required.

Demonstrate that housing trajectory assumptions are based on effective (serviced and unconstrained) land supply. If this is demonstrated to not be possible the Plan should allocate additional lands to accommodate the proposed growth in population and resultant increase in the number of required dwellings.

Clarify that urban capacity figures exclude constrained and policy-sterilised land unless mitigation is demonstrably achievable.

Provide clear evidence of infrastructure alignment with housing growth in the context that wastewater provision is outside the jurisdiction of the Council. In the very obvious absence of the ability to evidence this alignment the plan should remove this as a policy requirement completely.

Introduce increased flexibility to allow the provision of private wastewater infrastructure in the form of non-mains wastewater provision to act as a release valve to the heavily constrained public supply of appropriate wastewater provision.

Introduce flexibility within Policy ED3 to allow release of unsuitable or unused employment land for the provision of housing supply by allocating required floorspace to each zoned site and allowing the residual land after employment development to be used for other purposes.

Establish clear monitoring triggers and contingency mechanisms when delivery falls below trajectory benchmarks.

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Do you have any comments on the Implementation and Monitoring of the draft Plan Strategy?

No answer

+ ADD TO ANALYSIS

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

No answer

+ ADD TO ANALYSIS

draft Habitats Regulations Assessment(HRA)

No answer

+ ADD TO ANALYSIS

Equality Impact Screening Report

No answer

+ ADD TO ANALYSIS

Rural Needs Impact Assessment

No answer

+ ADD TO ANALYSIS

Please add any additional comments

No answer

Example tag 1 +

Example tag 2 +