

From: Councillor Barry Ward [REDACTED]
Sent: 10 November 2017 14:36
To: National Planning Framework
Subject: Submission: Concerns relating to Land Ownership being a consideration in the preparation of County Development Plans
Attachments: image006.png; image003.png

Dear Sir/Madam,

My concerns relate specifically to Objective 68, page 129 and Appendices 1 & 2.

The draft NPF goes into detail regarding changes to the way land is zoned in future County Development Plans, differentiating between:

- (i) Tier 1 - Zoned land that is available for development;
- (ii) Tier 2 - zoned land that requires further specific investment in basic infrastructure;

and

- (iii) Tier 3 - zoned land unlikely to be serviced in the life of the plan.

The draft NPF goes on to require Tier 1 and Tier 2 to be broken down into (a) and (b).

Tier 1 and Tier 1(a), in appendix A, require that land parcels that may need to be serviced through land in separate ownership is identified as Tier 1(a) (similar applies to Tier 2).

This differentiation between Tier 1 and Tier 1(a) requires a detailed knowledge of landownerships at Development Plan Stage. Development Plan Policies should be grounded in proper place making over the life of the Plan not landownership. Landownership has not, in the past, been a consideration, and to bring it into the Plan-making process is fraught with potential difficulties and challenges.

To do what is currently proposed in the draft NPF would require a knowledge of the ownership of all land parcels, the relationship between different ownerships (sometimes land is held by different companies but that does not mean ownership is actually different).

Sometimes land has options to be serviced from different directions; this level of detail would need to be known to correctly classify the zoning.

The information is only correct at a point in time so the plan could be out of date within the 2 years of the plan-making process. Issues to do with who owned what may become part of the consideration when deciding to zone land and this could open the Plan-making process to challenge on the grounds of improper considerations being taken into account.

I submit that the Government should consider removing the sections that relate to amendments to Development Plans from the draft NPF as they did not concern strategic policy and would not constitute good planning practice.

The level of detail as set out in the draft NPF would be better handled outside the Development Plan process, and consideration should be given instead to (1) strengthening Local Authorities' role in Active Land Management, and (2) preparing new section 28 guidelines for the preparation of County Development Plans. (Such guidelines should have their own consultation process so that careful consideration can be given to changes to the Plan making process, County Development Plans need to be made more user friendly not more complex.)

Thank you.

Councillor Barry Ward

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