

Statement of the Head of Planning Policy, Cabinet Office

1. We note section 3.2 confirms that Emerging Plans (which include a Draft Plan) “*can be seen as ‘other material considerations’ but this doesn’t imply they should be afforded a specific level of weight in decision making*” and at section 3.4 “... *there is more certainty about a plan’s direction after it has been through a Public Inquiry than one which hasn’t*”. The Draft Area Plan for the North and West has not been through a public inquiry as at the date of these submissions and accordingly we repeat our submissions above regarding the timing of this Application by RTC.
2. We echo the comments made in section 5.1.3 which confirms that 1,540 new dwellings in the North and West are required and to “*plan for a different figure would not be in the general conformity with the Strategic Plan*”. Section 5.3.3 confirms that the housing need for the remainder of the plan period (i.e. to 2026) could be met by 63 new homes within the existing settlement boundary of Ramsey and the remaining residual need of 102 satisfied via one site – the Lower Milntown Application. Notwithstanding, that the Lower Milntown Application was refused (and RTC objected to it) there are two sizeable planning applications, the Vollan Fields Application and the Poyll Dooey Application, which are pending consideration as at the date of these submissions and we repeat our submission that there is not insufficient acreage left within Ramsey to satisfy the housing need identified.
3. Section 5.3.5 refers to Paper P.EP 01 (Island Spatial Strategy Options) which identifies the residual need for housing between 2021 and 2037 – based on a 10 year housing growth projection for 100,000 people) as being 278 additional new dwellings in the North with Ramsey (as a service centre) expected to accommodate a high proportion but not all of those new dwellings. However, even if RTC intended to plan for this figure, we submit that RTC has not adequately argued within the Application that:

- a. they have insufficient acreage within the existing boundary to enable them to provide land for a proportion of this expected housing requirement;
- b. by taking the areas sought pursuant to the Application would remedy this alleged land deficit; or
- c. RTC would suffer injury due to being unable to satisfy an obligation to provide a certain number of additional new dwellings pursuant to an adopted plan which has been approved by Tynwald.