

Elaine Mullin

From: Liam Ward [REDACTED]
Sent: 17 April 2019 11:23
To: DevelopmentPlan@midulstercouncil.org
Subject: Representation - RDS Coherence
Attachments: WD 3 - RDS Coherence.pdf

Sirs,

See attached another representation

Regards,

Liam Ward



Ward Design | 10 Main Street | Castledawson | BT45 8AB | Tel [REDACTED] | <http://www.ward-design.com>

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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 & Sustainability Assessment

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

Title

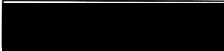

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

2. Agent Details (if applicable)

Address Line 1	10 Main Street	
Line 2	Castledawson	
Line 3		
Line 4		
Post Code	BT45 8AB	
Telephone Number		
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 Sustainable development
- (iii) Growth Strategy/
Spatial Planning Framework _____
- (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.planningni.gov.uk/index/advice/practice-notes/development-plan-practice-note-06-soundness-version-2-may-2017-2a.pdf>).

Soundness Test No.

CE 1

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:

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

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:

17th April 2019

Regional Development Strategy – Coherence

The Regional Development Strategy is, in itself an incoherent document, and its effort to please all constituencies inevitably confuses those who seek to rely on its guidance in making local plans. On the one hand the RDS policies seek to promote Belfast, but in tension with that is the legitimate objective to sustain rural communities and grow hubs.

The outworking of the RDS through local plan making has tending to begin, and end with reference to Housing Growth Indicators, which are regarded by some as a cap to be worked toward.

In the Draft Plan Strategy it is notable that there is very limited discussion about what might make rural communities sustainable, but rather an application of Local Housing Indicators, which would, if allowed to apply, set localised caps on the ability of each community to grow, without any review or understanding of the sustainability needs of that settlement and its hinterland.

Relevant RDS Policies

The council's planning officers will have advised the council, correctly, that it must refer to the Regional Development Strategy in making this plan. That approach is guided by passages like the following extract from the RDS:

3.42 The population of Belfast is forecast to fall over the next two decades; therefore population decline needs to be reversed in order to have a strong capital city which is the economic driver of Northern Ireland. The aim is for the population of Belfast City to be 300,000 by 2021 which was the level achieved in the 1980s. Key to population growth will be the provision of housing to meet the full range of need. The Housing Growth Indicators in Appendix B have been calculated on the basis of growing the population of Belfast, not on the projected population decline.

Growing the Belfast population, in that passage, is read by some to mean restricting growth elsewhere, including Mid-Ulster. In turn that leads to migration of the most economically active age group, out of the district, de-population of schools, reduction in working age adults, reduction in new-business start-ups, increased average age of the remaining population.....

My interpretation is informed more by the entirety of the RDS, whose policies include:

SFG13: Sustain rural communities living in smaller settlements and the open countryside

3.98 The distinctive settlement pattern of main and small towns, villages and dwellings in the open countryside is unique within these islands. Many people working on the land are conscious of continuing a cultural tradition. They have a strong interest in sustaining that tradition, the land itself and the living that it provides. It is important that development is sensitive to these issues. The rural community is the custodian of our exceptional natural and built environment. In rural areas, the aim is to sustain the overall strength of the rural

community living in small towns, villages, small rural settlements and the open countryside.

All settlements in Mid-Ulster, including the 3 bigger towns, are included in the meaning of that section.

There is an obvious tension between those two short extracts from the Regional Development Strategy, which the council's plan must be in general conformity with. It is in the space between these two policy objectives where the council has a significant degree of discretion. I feel that the Draft LDP strategy has weighed the balance too heavily in favour of the Belfast policies, and not nearly enough toward sustaining our community.

I accept that the council's planning officers will be under pressure from the DfI hierarchy to deliver a Mid-Ulster Plan which is good for Belfast, but I respectfully suggest that there is a better way. I acknowledge that the Council has invested a great deal of effort into making this draft, and that it will see a need to keep moving along the current pathway, but there remain opportunities to revisit the outworking of the plan at subsequent stages. It's not too late to remedy the harm likely to be caused by the current course.

Measure of Sustainability, and Harm

Before determining whether the Plan contributes to sustainable communities it would be necessary to define what that means for each community. Only then could a coherent sets of policies be considered for each community and each settlement.

Throughout the Draft Plan Strategy and the Sustainability Assessment the phrase "sustainable development" is employed, without the appropriate consideration of what that might mean. There is reference to sustainable forms of transport, but nothing about sustaining a community.

For example, the small settlement of Dunnamore has a primary school, a shop, churches, a nursing home, together with other community assets. The plan doesn't pretend to consider what might help that community sustain itself. Instead it defines a housing local indicator of 8 units, and records that there are 20 committed units. These statistical conclusions will lead to the removal of all uncommitted lands from development boundaries. If the "committed" sites are developed, that would offer this community an average of roughly 1 additional dwelling per year during the Plan period. If they are not developed, then the settlement would have no additional housing before 2030. This restrictive plan making would cause chronic harm to that settlement, and reduce its sustainability as a community.

- The primary school relies to some extent on new families forming, so school population will fall, potentially threatening teacher numbers, or in extremis the viability of the school
 - New households have no opportunity to set up home in the settlement, so would migrate.
 - Such out-migration would increase the average age of the community.
 - The remaining older community would not have their children nearby to offer support into old age, thereby increasing the demand on the public service providers.
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- The migrants would be the most economically active cohort, so those budding entrepreneurs, trades people, carers, and others would cease to contribute to the economic performance of the settlement.
- The settlement's income would diminish, as older people retire, and young people move away.
- This poorer settlement would be less likely to be able to support the local shop, or contribute to the upkeep of churches and other voluntary bodies
- Sports clubs would be deprived of a cohort of young adults.
- The businesses in the area, including the nursing home might struggle to recruit staff, threatening the viability of businesses in the area.

The same arguments apply to larger settlements in the district too. Beginning, and it appears ending the discussion about how many new homes a community might need by a top down allocation of the RDS's Housing Growth Indicators, leads to less sustainable development.

This approach is contrary to all of the objectives and policies defined in the RDS's narrative around Hubs & Clusters, the Rural Area and Gateways and Corridors.

Changes Sought

The Draft Plan Strategy has no coherent strategy for the consideration of sustainability, as it applies to the Plan district.

Consider the sustainability of local communities rather than setting Local Housing Indicators as a top-down methodology.