

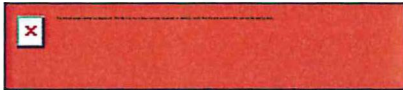
Elaine Mullin

From: Liam Ward [REDACTED]
Sent: 17 April 2019 07:54
To: DevelopmentPlan@midulstercouncil.org
Subject: Representation 2
Attachments: WD 2 - Overstatement of Housing in Countryside.pdf

See attached

Regards,

Liam Ward



Ward Design | 10 Main Street | Castledawson | BT45 8AB [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

Development Plan Strategy

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

--

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 _____
- (iii) Growth Strategy/
Spatial Planning Framework _____
Spatial Planning Framework, Implementation,
Housing in Settlements, Housing in the Countryside
- (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.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

Housing in the Countryside – Impact on settlement allocations

In the Council’s position Paper on Housing, and in the Draft Plan Strategy there is record made of the numbers of houses, and population accommodated in the countryside, outside settlements. That historic settlement pattern must be respected, but the council appears to have assumed that the proportion of new housing in the countryside will continue to be high. That assumption leads to a perceived need to limit the quantum of housing in settlements still further, in order to get to numbers as close to the adjusted HGI as possible.

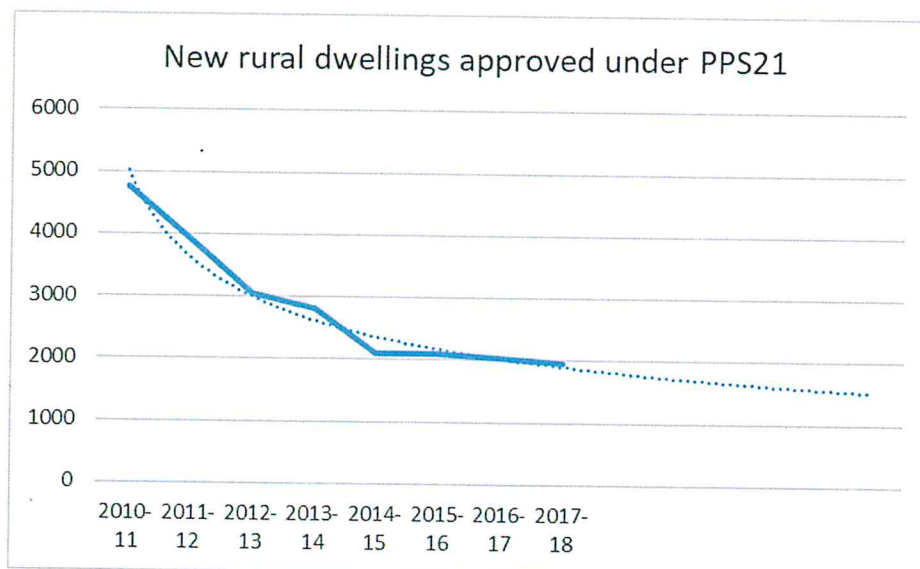
That assumption is unsound

Approvals for additional homes in the countryside since PPS21:

The relevant planning policy relating to development in the countryside is PPS21 Sustainable Development in the Countryside. It followed a period during which a more restrictive policy for rural development had applied, PPS14. In the final years of before the publication of PPS21 it had been agreed by Planning Service that application decisions would be withheld, pending the introduction of PPS21. Therefore, when it was first applied in decision taking there had been several thousand applications pending decision. This led to high numbers of approvals for additional dwellings in the countryside during those early years.

As time passed the numbers of applications to build in the countryside stabilised, at a much lower annual rate.

The statistics published by Planning Service, and later the Department of Infrastructure are somewhat lacking in detail. The following graph attempts to summarise the numbers of additional dwellings approved in the countryside, across all 11 council areas, during each year during which statistics are available.



The numbers have fallen from over 4000 during the first years after PPS21, to around 2000 per year during the most recent years for which DfI has published NI Planning Statistics.

For Mid Ulster district no statistics are published. We can only assume that the same pattern applies.

PPS21, and the Draft Strategy define a limited number of opportunities to develop additional housing in the countryside. I discount replacement dwelling approvals, given that these are substitution rather than additions. The numbers of infill opportunities will be finite. Similarly the opportunities to win approval for dwellings in clusters, or in special personal circumstances will be reducing over time. The farm dwelling take up has been modest, with no reason to believe that this will increase. Whilst it is acknowledged that the Draft Strategy introduces some new exemptions to the general presumption against development in the countryside, these will contribute a very modest number of additional homes.

The statistical history of planning approval for additional dwelling in the countryside is a matter of fact. The trendline continues to move downward. It is likely that the average annual number of additional houses in the countryside will diminish during the Plan period.

We might assume that Mid Ulster district's proportion of the NI rural approvals is around 10% (11 councils minus Belfast). The recent historical approval rate for the district might be around 200, which is likely to diminish to something like 150-180. Over the Plan period that rate might deliver around 2500 dwellings.

Changes Sought

The Draft Plan Strategy suggests that review of rural policies might become necessary if the approvals exceed 4380 (page 261). That is being regarded as a form of ceiling.

Given that the predicted number is around 2500, the number of houses effectively allocated to the countryside is overstated by around 2,000.

Given that DfI has effectively approved a district Plan illustrating 6294 (page 253) + 8092 (page 260) + 32 + 4380 (page 261) = 18,786 additional dwellings for the district, it would seem logical that corrections within that total would also satisfy the test of conformity with the Regional Development Strategy.

I seek the redistribution of the 2000 houses, overstated as the countryside component, to settlements.

I contend that this suggestion is wholly in conformity with the RDS objectives of accommodating more people in settlements.