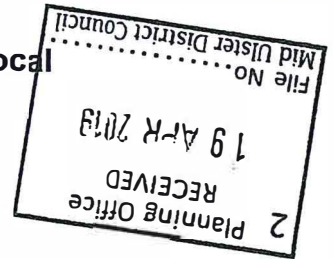


Rec'd 3:45pm 19/4/19

Submission of a Representation to Mid Ulster District Council Local Development Plan 2030 - Draft Plan Strategy



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

District Proposals Map 1 d

Representations must be submitted by 4pm on 19<sup>th</sup> April 2019 to:

Mid Ulster District Council Planning Department  
50 Ballyronan Road  
Magherafelt  
BT45 6EN

Or by email to [developmentplan@midulstercouncil.org](mailto:developmentplan@midulstercouncil.org)

Please complete separate form for each representation.



SECTION A

1. Personal Details

2. Agent Details (if applicable)

Title Mrs

[Empty box]

First Name ALLEN

[Empty box]

Last Name DRUMM

[Empty box]

Job Title (where relevant)

[Empty box]

Organisation (where relevant)

[Empty box]

Address Line 1 7 SYCAMORE DR

Line 2 MAGHERA

Line 3 Co. DUBLIN

Line 4 BT46 SHE

Post Code BT46 SHE

Telephone Number [REDACTED]

E-mail Address [REDACTED]

**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 LOCAL DEVELOPMENT
- (iii) Growth Strategy/ PLAN VISION AND OBJECTIVES
- Spatial Planning Framework SECTION 4
- (iv) Policy ~~DISTRICT PROPOSALS MAP~~
- (v) Proposals Map MAP 1.D
- (vi) Site Location CULLEADUFF

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](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.

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:

We consider the DPD to be unsound.  
See attached document.

*(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 document*

(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:

12 | 4 | 19

The Council Draft Plan Strategy (DPS), In keeping with Government Policy, seeks to promote more sustainable patterns of development. This being the case the Draft Plan Strategy should be amended as set out below to further sustainability.

An additional bullet point should be included after the fourth bullet in paragraph 3.15 (under the heading Accommodating People and Creating Places). The new bullet point should read,

*To give priority to sustainable locations when identifying land for development and drawing development limits for settlements.*

Since maximising the use of existing infrastructure and services is central to promoting more sustainable development a new bullet point should be included after the third bullet in paragraph 3.15 (under the heading 'Enhancing the environment and improving infrastructure'). The new bullet should read,

*To maximise the use of existing sewerage infrastructure and services.*

In paragraph 4.24, Strategic Planning Framework (SPF) 4 should be expanded to make it clear that sustainable sites will be given priority when identifying land for development and drawing development limits for settlements at the Local Policies Plan stage.

The DPS must also take account of some unique factors which inhibit the release of land for development in villages. Land owners in rural settlements often have an attachment to their land which stretches back generations. This 'link to the land' has consistently impacted on the release of land in rural settlements. The DPS must make it clear that additional land will be included inside village development limits at the Local Policies Plan stage to overcome this 'link to the land' issue. In addition, the DPS should indicate that land which has been within settlement development limits during the previous 'plan period' but not developed will be deleted from the limits.

The importance of providing a range of housing capable of meeting the needs of families, the elderly and disabled, and single people, at locations accessible to community services and leisure and recreational facilities is highlighted in bullet point 4 in paragraph 3.15 under the heading Accommodating People and Creating Places.

Gulladuff provides community and recreational facilities (Termoneeny Centre and 2 Schools) which serve the wider area. It is also very close to a major employer (F P McCann). In addition, it is served by a new Waste Water Treatment Works (WWTW) with spare capacity, an increasingly rare circumstance in Northern Ireland where more than 40 WWTWs have no spare capacity and a further 20 are nearing capacity. Since NI Water does not have the funding required to upgrade the problem WWTWs and is not approving any new connections to a public sewerage network served by a WWTW with capacity problems, it is essential that settlements with new WWTWs are given priority when allocating development. These factors dictate that the housing allocation for Gulladuff over the period 2015 – 2030 should be reassessed and significantly increased.