

**Elaine Mullin**

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**From:** Liam Ward <[REDACTED]>  
**Sent:** 18 April 2019 16:32  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** Representation - Dunnamore  
**Attachments:** WD 6 - Dunnamore.pdf

Sirs,

See representation attached

Regards,

**Liam Ward**



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Ward Design | 10 Main Street | Castledawson | BT45 8AB | Tel: 028 7946 9000 | <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)

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Name of the Development Plan Document (DPD) to which this representation relates

**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**

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**1. Personal Details**

**2. Agent Details (if applicable)**

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text" value="Theresa"/>	<input type="text" value="Liam"/>
Last Name	<input type="text" value="O'Neill"/>	<input type="text" value="Ward"/>
Job Title (where relevant)	<input type="text" value="Owner"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Rivervale Country Nursine Home"/>	<input type="text" value="Ward Design"/>

Address Line 1		10 Main Street Castledawson
Line 2		
Line 3		
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E-mail Address		

**SECTION B**

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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 Housing allocation  
Sustainable Development \_\_\_\_\_
- (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.

CE1 CE2 C1 C3

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.

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Signature:  Date:

### Dunnamore

The Sustainability Appraisal claims to assess alternative approaches to housing allocation, but its own evidence is that these alternatives were so narrow in their scope that they failed to be meaningful alternatives at all. Each alternative uses, as its starting point, the RDS Housing Growth Indicators, adjusted for the relevant period. None of the four alternatives described references the rural policies in the RDS, and so cannot have considered the sustainability of the communities at each settlement or rural area.

A document entitled Sustainability Appraisal, which fails to consider how best to make each community sustainable, must be unsound, and must by extension lead to the entire Draft Plan Strategy being unsound.

The Housing Position Paper which informed the Draft Plan Strategy is also lacking in robustness. It uses for its evidence a set of statistics which measure the housing delivery during a very unusual period in our history, and extrapolate from there.

A Draft Plan Strategy which relies on a flawed evidence base must be unsound.

### Relevant RDS Policies

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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*

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*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**

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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.
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- 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, including nursing homes.
- The migrants from Dunnamore 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, including the nursing home might struggle to recruit staff, threatening the viability of businesses in the area, at a time when the age profile is growing older, and potentially increasing the need for residential care.

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 communities.

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.

### **No consideration of the relevant alternatives**

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A series of alternative approaches were set out in responses to the POP, and only a selected number were described in the report on POP, or in the Sustainability Appraisal and SEA.

### **No robust evidence base**

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The Housing Position Paper considers the quantum of housing delivered during recent years, and assumes that a similar annual build rate will apply in future years. That in itself is an errant approach.

The study period included a period of recession and economic stagnation following the banking crash of 2008. Housing development ground to a virtual standstill during the years immediately after that crash, and has recovered very slowly thereafter. The current annual build rate across Northern Ireland remains at around 50% of the regional housing need projected by the authors of the RDS, and other public policy makers. Many of the district's "committed" sites remain frozen by the owner's financial position post crash, or by asset managers acting on behalf of lenders. Most high street banks remain unwilling, 11 years after the crash, to lend meaningful sums to house builders, such that they can deliver new homes to satisfy the local needs.

Added to that deliver problem is a land supply problem, with two principal causes. Firstly, landowners are often difficult to persuade that the moment to sell to a house builder is just right. When prices are rising landowners tend to delay any sale. When prices are falling, they tend to

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delay any sale. Secondly, the recently adopted Magherafelt Area Plan, and recently reviewed Cookstown & Dungannon Area Plans tended to “bake in” a limitation in the supply of housing land. In all cases the land zoned for housing, or included within development boundaries has diminished over time, and the remaining lands have all been inside development boundaries for 30-40 years, without delivering a single home.

When the study period includes a funding crisis, and a land supply crisis it is inevitable that the building rate will be slow. This Draft Plan Strategy is founded on that evidence base, which makes it unsound.

NISRA reports similarly record historic events, and population movements without regard for the context. Its projections for population growth run a trendline through historic measurements. That deflated history of housing supply during the past decade is then translated into a projection of future housing need. This approach is unsound, and leads to an unsound plan where the Plan relies on these projections.

One output from the NISRA statistics worthy of note, and deserving of a policy response is that the Mean Household Size in Mid Ulster is the highest amongst the 11 council areas. At 2.88 persons per house it is significantly higher than the NI average, which in turn is higher than the UK average. I argue that the response to that statistic should have been to plan for additional housing sufficient to bring the MHS in Mid Ulster down toward the NI average.

In the case of Dunnamore the base information is, in part the housing monitor at 1<sup>st</sup> April 2015. The monitor lists a site reference 19379 as having a “remaining potential” to accommodate 17 dwellings. That number, together with 3 single house sites, finds its way into the Draft Plan Strategy as a “committed” site, even though it has no searchable planning approval. Nor is there any evidence on the ground of any work relating to a housing development having commenced. I acknowledge that there is a recent planning application on these lands, seeking permission to develop 14 houses, but that application is not yet approved. This is NOT a committed site.

It is not reasonable to expect one individual, concerned resident to undertake a comprehensive review of these statistics per settlement. In reviewing this settlement we can see that the errors are meaningful, and we fear that a similar lack of rigour will have applied elsewhere across the district.

### **The strategy, policies and allocations are realistic and appropriate**

Given the commentary above, we say that the strategy, policies and allocations are neither realistic nor appropriate. The DPS approach to allocations is based on a distribution of the HGI, pro rata to settlement households, and then comparing that Housing Local Indicator with “committed” sites. In 63 of the 85 settlements studied, that comparison has indicated that the committed sites are equal to, or exceed the LHI. That appears to have led the plan makers to conclude that their task, in such circumstances, is to limit the perceived harm which this oversupply might cause.

In fact the evidence base which leads to that conclusion cannot be safely relied upon. Therefore the entire policy platform which from any conclusions about “oversupply” is inappropriate.

### Changes Sought

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The Draft Plan Strategy is founded, to a very significant degree, on policies designed to limit growth of towns and villages in Mid Ulster. Although it says that it doesn't regard the HGI as a cap, its use of Local Housing Indicators, and indication that the level of committed sites across the district already exceeds the allocation, is a clear indication that its authors have referenced the HGI throughout Plan preparation, and have, I allege, prepared a Plan to fit that cap as closely as they could manage. The approach is contrary to the RDS objectives and policies for rural areas, hubs and clusters.

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

**Revisit the assessment of alternatives**

**Collate a more reasonable and realistic evidence base**