

Elaine Mullin

From: Theresa Cassidy <info@tctownplanning.co.uk>
Sent: 19 April 2019 13:54
To: DevelopmentPlan@midulstercouncil.org
Subject: G/003/17 - Representation for draft Plan Strategy
Attachments: Representation to Mid Ulster Council 19.04.19.pdf

Dear Sir/Madam,

Please find attached representation in response to Mid Ulster Council's Draft Plan Strategy public consultation; a hard copy of same will also be delivered to your office this afternoon. I trust this will be given appropriate consideration in the next stage of the plan process.

The representative reserves the right to make further submissions at the appropriate stages.

If you require any further information or clarification please do not hesitate to contact me on the number listed below.

Kind regards,

Theresa Cassidy BSc (Hons) MSc (Ecology & Conservation)

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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

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 BALLYNEASE RD, UNIT C12

Line 2 PORTCELLENONE . THE BUSINESS CENTRE

Line 3 80- 82 RAINEY ST.,

Line 4 MAGHERAFELT.

Post Code BT45 5AJ .

Telephone Number XXXXXXXXXX

E-mail Address info@tctownplanning.co.uk

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 SPF 4
- (iv) Policy HOU 1
- (v) Proposals Map
- (vi) Site Location Bellaughy + Clady .

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.

CE3 + CE4.

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:

PLEASE REFER TO APPENDED PAGES
- CLIENT ALSO WISHES TO RELY
ON SUBMISSION MADE FOR LAND
ADJOINING HUNTERS PARK, BELLAGHY
& LAND AT CLENONE ROAD, CLADY AT
PREFERRED OPTIONS PAPER STAGE.

(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.

PLEASE REFER TO APPENDED PAGES.

(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:

Part 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.

The following comprises a two prong approach on Spatial Planning Framework 4 (SPF 4) and Policy HOU 1 of the draft Plan Strategy (dPS) addressing where it would appear to meet and fail Soundness Test No.'s CE3 and CE4. In the interest of attempting to provide clarity SPF 4 and Policy HOU 1 of the dPS will be addressed in turn.

SPF 4 – Maintain and consolidate the role of the villages as local service centres providing opportunity for housing, employment and leisure activities in keeping with the scale and character of individual settlements.

Paragraph 2.4 of the dPS states:

“We are also a very rural District with 72% (NISRA, Statistical Classifications and Delineation of settlements), of the population living in a rural area, as defined by the inter-departmental rural urban definition group. This definition of rural means that everywhere in the District is classed as rural apart from Cookstown, Dungannon, Magherafelt and Coalisland. Additionally, 40% of our households are located within the countryside.”

SPF 4 of the dPS is in general conformity with the Regional Development Strategy (RDS) as it wishes to maintain villages as local service centres. SPF 4 recognises the importance villages play in catering for the surrounding rural population; however, paragraph 4.26 would seem to be at odds with ensuring opportunities for housing within villages is protected as it states:

“In the main we do not intend to reserve land for housing or economic development although exceptions may exist where there is a need to expand or accommodate an identified rural enterprise within the settlement limits.”

It is contended that an appropriate amount of land for housing does need to be provided in some of these settlements. Each village should be assessed on its own merit, e.g. scale of the village, population, number of services, number of units required etc and an appropriate amount of land zoned accordingly for housing. It would be dismissive of the council not to consider zoning land within villages especially for the larger of these.

The same number of households still needs to be provided for as per the Housing Growth Indicators (HGI's); the goal of 11,000 new homes by 2030 can only be achieved where land is released. The unavailability of land for development or intent to develop has compromised the provision of housing allocation within Bellaghy. As per Appendix 1 of the dPS, 264 units remain to be developed for the village and this includes residual land. As demonstrated in the representation made by Hugh Griffin and Sons Ltd at the POP stage, a large proportion of zoned residential land within Bellaghy has not been developed and no

attempt has been made to indicate otherwise. This has stymied development for Bellaghy throughout the lifetime of the extant area plan and should not be carried through to the new LDP.

With regards to the village of Clady, after deducting 18 units (the committed units still to be developed and residual zoning as per Appendix 1 of the dPS), it is expected that a further 26 units are required throughout the plan period.

It may be irresponsible for the council not to reserve land for housing or economic development in villages as indicated in paragraph 4.26 of the dPS. To ensure that ample land is made available during the lifetime of the new Local Development Plan (LDP) it may be appropriate to re/de-zone land that has remained inactive for more favourable sites and where intent is demonstrated. This will ensure that the appropriate percentage of households can be accommodated within settlements consolidating and clustering development in accordance with the RDS without compromising the number of units for the open countryside. Development within villages will maintain a rural sense of place preferred by most households as described in the previously referenced paragraph 2.4 of the dPS.

Part 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.

There is clearly a desire to live in the countryside and land within villages will meet this objective while still providing direct links to associated services.

To ensure that zoned residential land is developed within villages, this may be subject to ongoing monitoring whereby within 5 years it is required that intent is demonstrated to release the land for development purposes or risks re/de-zoning. This would form part of the ongoing implementation and monitoring process for soundness test CE 3 and allows the council to apply flexibility where there is a change to circumstances in accordance with soundness test CE 4. This will also satisfy "Monitoring of Our Plan" aims set out in section 24 of the dPS.