

MID ULSTER COUNCIL
LOCAL DEVELOPMENT PLAN 2030 – DRAFT PLAN STRATEGY

RESPONSE BY ULSTER UNIONIST GROUP IN MID ULSTER COUNCIL

It is the UUP Group position is that the Draft Plan has been presented to Council before it was ready, rushed through with inadequate consultation with Members or initial consultation with the community in advance of a working draft being prepared for full consultation. The aim to have a draft plan of some type completed in the first term of the new Council has therefore led to the concerns of the local people not being fully considered. Both Unionist parties advised council that this strategy had not been fully debated by councillors and further advised that in their opinion to go ahead with public consultation was premature, and even that contained inherent omissions. Those wishing to ask questions about the Draft Strategy had the option of calling at Drop -in sessions at 12 different locations where planning staff will be available to answer those questions over a total of 60 hours. Not in Moneymore though, where the opinion of residents would seem to count for very little.

Another anomaly concerns the information on page 11 of the Development Plan that until such times as the Local Policies Plan has been prepared the three existing (extant) Area Plans would remain in operation and in effect represent the Local Policies Plan until such times as it has been prepared.

- At the December 2018 meeting of Mid Ulster District Council full backing was given to the need for an upgrade to the A29 protected route which meanders through the council district
- Councillors agreed that it is important for the future prosperity of Mid Ulster, to construct bypasses at Moneymore, Cookstown and Dungannon

The omission of such an important infrastructural imperative has also driven a coach and horses through the much-stated vision of the Mid Ulster Community Plan. The upgrade of the A29 is the engine that will facilitate that vision. Provision of proper bypasses along the stated route are prerequisites to health and wellbeing by minimising pollution while sustaining our environment and heritage, leading to a thriving economy. This single infrastructural renovation is the kernel, the seed corn of the economic - renaissance of the district.

The UUP Group has significant concerns on the Draft Plan, including in regard to the phasing of land. For instance, in Cookstown we have phase 1 land that will never be used but phase 2 land will not be released until phase 1 is complete which has significant implications as it limits growth and restricts future investment e.g. Invest NI, and independent developers/businesses. The lack of development land in turn leads to:

- shortfall in jobs and opportunities in the Mid-Ulster area;
- reduces the workforce within our council area due to lack of housing.

Mid-Ulster is the lead area for construction and manufacturing and at present companies are struggling to source their workforce. The UUP Group believe the figure of 10,000 new homes in the next 10-15 years is a gross underestimate of the need that will exist, especially in rural areas.

The Draft Plan refers to applications of 50 or more houses having to have social housing. This we believe will lead to applications for 49 houses so no need for social housing! Moreover the Draft Plan as presented is insufficiently specific, and should have been supported by draft policy to demonstrate how applications would be considered.

These additional comments below are made without prejudice, should be considered a preliminary response, and it may well be that as the out-working emerges that significant re-working of the Plan may be required sooner than implied in the monitoring proposals.

SPF 4 Page 40

The general impression given is that villages will be allowed to wither and die

4.26 States that "we do not intend to reserve land for housing or economic development2

If your community doesn.t grow it dies

We feel that some of these villages places such as Culnady, Upperlands, Curran, Knockloughrim are most at risk as these villages already house mostly senior citizens.

SPF 7 Page 43

Dispersed Rural Communities is a misnomer. The entire rural area, which houses 40% of Mid Ulster district's population

Is a Dispersed Rural Community.

So quite clearly you can see that DRC's are competing directly with the villages for the rural housing quota.

We have to be seen to be even handed in our approach to villages as in the Mid Ulster area most of our villages are from one section or the other

When the divisive proposal is added that Lough Neagh fishermen should have preferential treatment by allowing them to build houses in an ASSI, the question must be asked –“Should the Equality Commission be asked to proof read this Draft Document? D?”

In conclusion, We would like to acknowledge the amount of hard work that has gone into the preparation of the Draft plan. However we feel that while this plan has lots to offer the people of Mid Ulster there is still a lot changes that need to be made.

Page	Paragraph / Policy	Extract from document	Comments
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	Number		
13	1.15	The Local Development Plan must take account of our Community Plan. Indeed in 1.16 The Draft weakly says the Local Development Plan <u>seeks</u> to implement the outcomes of the Community Plan.	As the Community Plan is largely aspirational it is impossible to take full account in The Local Development Plan. The best we can hope for is to pay lip service to the Community Plan. To claim more is misleading the members of the public.
15	1.24		Addition to bullet points. <ul style="list-style-type: none"> We give our ageing and elderly the best of health and wellbeing in their retirement years.
16		<i>... border counties and strengthening accessibility from and to the central border area. From a heritage and tourism perspective... pre-Christian and industrial heritage</i>	Why just pre Christian? We have an ongoing Christian heritage which also ought to be referenced.
16	1.29	Mention of two Key Transport Corridors	Another missed opportunity to mention the necessity to construct three new bypasses at Cookstown and Dungannon and including Money more
	1.30		<ul style="list-style-type: none"> It will be nigh impossible to give meaningful solutions for rural communities to access services. Expanding Rural Transport Partnerships might be some help. Planning in Republic of Ireland <p>Important to take cognisance of the lessons learnt in ROI and to avoid their excesses, such as Donegal Bungalow Blight.</p>
Page	Paragraph / Policy Number	Extract from document	Comments

17		Three cross boundary forums have been established under the three themes of 'The Sperrins', 'Cross Border' and 'Lough Neagh'. The cross boundary work of the three forums will continue	An observation. <i>Local Government had similar 'groups'. These were dismantled. What assurance do we have that the groups referenced will be any more sustainable? If they go, with what will the Draft Plan reference instead?</i>
17			<i>sustainable development to be continued into health provision of separate granny flats to link into current NHS policy</i>
18	1.39		This section smacks of anti-Brexit narrative. Surely it not our concern to create infrastructure and services to facilitate the Republic of Ireland at the expense of our towns and communities with Northern Ireland?
18		Rural proofing	Requires definition
19	1.42		Important to liaise with Causeway Coast and Glens and ABC councils on major roads infrastructural considerations such as upgrade of A29.
22	2.7		<i>include a reference to a bypass around Monrmore, and Moy also</i>
23		HEALTH	The general levels of health in the District are good despite having poor access to emergency services • Life Expectancy is slightly higher than the NI average with 77.7 for men and 82 for women.
27	3.7		<i>include a reference to a bypass around Monrmore, and Moy also</i>
29	3.9		preservation of railway lines for environment is good, also fir trains in future,
Page	Paragraph / Policy Number	Extract from document	Comments
29		To recognise the needs of both growing families	Granny flats - good

		and carers of the elderly and disabled by accommodating development which allows people to remain within their own communities...	Home working - good Radon omitted but flooding referenced
31	4.2		why single out the linen green?
35			settlements - Tullywiggan etc require timetable for review of their development boundaries in light of housing requirement projections
	4.23	Proposals for a range of uses will be considered on their planning merits. In order to ensure that our villages are not subject to excessive development pressures settlements will normally be fairly restrictive recognising that it will not always be possible to	These planning merits require clarification and definition
39	SPF5	Provide development opportunities within small settlements appropriate to their size and scale, allowing for single houses and small groups of houses;	Clarification, by guidelines and policies to be developed in parallel with the Draft Plan to avoid ambiguity
	4.32	It is important that this success is allowed to continue but...remains properly managed. In the main the policy within this plan is designed to accommodate sustainable expansion. We also recognise the value of clustering businesses. Within the countryside ... there are groupings which are not on an industrial estate but where complementary industry could locate beside it...	enable single business enterprise too
Page	Paragraph / Policy Number	Extract from document	Comments
	4.46	n looking at travel times and the connectivity	Very supportive of this

		between our hubs and settlements we are keen to ensure opportunities for improvements to transportation is not lost and therefore we will protect disused railways from development which would prejudice their future use.	
	4.46	We will also protect the Ulster Canal ..river banks ...possibility of riverside walk ways and cycle ways is not lost for future generations	Very supportive of this
	4.49	We remain committed to the provision of a by-pass around Cookstown and Dungannon and will use our powers to protect any road line identified for development	Also Moneymore to be include this is a place. Up to 2030, and Moy
	4.52		are these special areas defined?
	4.62	Where there is a conflict between the extant plans or any future Local Policies Plan or the Plan Strategy, greatest weight will be attached to the Plan Strategy. This includes differences in terms of either the written statement or the accompanying plans. Where there are differences between the written documents and any accompanying plan maps, the written statement takes primacy.	Clarify that this will be especially applicable where health and car at home, or on the site, applications are being considered
	Par. 56b		clarification of this paragraph
	Par 57f		cross reference to building regulations. General comments- need clarification on general points by, say, policies and procedures etc.
63	HO3		clarification in terms such as 'does not unduly affect'
65		PHOTO	Change to photo where downpipe is not broken
Page	Paragraph / Policy Number	Extract from document	Comments
	7.24		rights to light clarifications required as too vague
	7.44		not necessary to reference the 'migrant population'

	7.46		guidance on min size of room
	7.51		
	7.51		there needs to be some reference to neighbours when considering travellers sites
	7.9		conversion of barns not mentioned
78			definition required for 'ribbon development or urban sprawl'
	8.11	Designation of Dispersed Rural Communities within our district.	Dispersed Rural Communities have caused much resentment and are being promoted by and for one section of the community, by and large. Carntogher was mooted for dispersed status and this became a self-fulfilling prophesy. Forty percent of our population dwell in the rural area. Surely the entire rural area is dispersed. Dispersed Rural Areas have very little difficulty obtaining planning and are competing unfairly for the housing quota for the wider rural area. Indeed small rural hamlets and villages will decline further as a consequence.
	8.44		he releasing of capital is not a planning consideration and should be removed
	8.59		will other councils on the shores of Lough Neagh also offer the same facility to fishermen in relation to new dwellings? It is noted that we are to operate in acknowledging our neighbours.
Page	Paragraph / Policy Number	Extract from document	Comments
	CT4		uncomfortable with concept of removing the policy if there are adverse consequences. Better not to include it at the outset.

	CT5		this implies that permission will be branded for new dwelling is the mobile accommodation is also approved! The choreography to be clarified and the conditions that apply amplified and clarified.
82	CT2 (e)		Define 'next to' and 'visually linked' with specifics, such as dimensions and other parameters
91	Section 8ff		lost if this information is in the past. Also, how necessary is this level of detail in a plan of this nature?
	UD1		it is good that design is of most suitable quality. The centre of Moneymore is an example, from Amy years past, how not to design! This plan should compel developers to upgrade where possible to current design standards.
	10.14		'open space' to be defined, and also clarification on ownership. For instance in Moneymore a tree that the community liked and added to the amenity of the night street was cut down to accommodate a car park. Business argument overcame the conservation aspects. There is also the general issue of OBJECTIONS. Sometimes the public will object, but other times they are frightened to do so. In those later circumstances it is for planning to determine independent of the public as it is best placed to do so.
	11.14		where are the principles planning policy available?
Page	Paragraph / Policy Number	Extract from document	Comments
	ECON2		comment on the proximity to residential developments and domestic housing generally that is acceptable (Draperstown example)

	11.16		business plans can be overly optimistic! Who will evaluate their viability for planning dept.?
	12.13		shops at edge of villages have a negative effect in the village; with Moneymore being a prime example; whereas in Newmills the shop has provide a focal point and new life for the village
	12.15		the shops can provide more than 'limited' offering (which is acknowledged in 12.39)
126	RE2		reference to be made to appropriate signage (as in 12.40) also which impacts in the amenity of the high street (12.33 is spot on in this regard)
	RE6		this is practically unenforceable, as market forces will dictate.
	RE7		is 100 sq. meters area not too limiting for viable shop?
	13.3		Other very successful local businesses such as <i>Mallaghans</i> should be mentioned too - or just leave as generic
	13.5		the quarrying of stone from Slieve Gallion is not having detrimental visual effect on the mountain not unlike the 5 fingers in Northern Cyprus where a significant natural feature is being slowly removed by quarrying its stone!
	13.6		Mid Ulster provides materials beyond the 'local market'
Page	Paragraph / Policy Number	Extract from document	Comments
	13.7		is this viable?
	MIN2		where is our expertise on these matters? How do we engage it?
156	TOU1		We would have concerns about defining specific

			businesses – Glenavon Hotel and Greenvale Hotel have been referenced – to exclude the possibility of their sites being developed for other purposes. This is likely to impact negatively on the potential market value of that land, not reflect market forces and demand, and potentially disadvantage the current owners. It may even be legally challengeable.
	15.10		'may' should read 'many'
	16.2		old railway lines should only be developed in reversible ways as we might need more trains in future! Also recent experience in Moneymore shows that trees are not protected in a conservation area and business needs trumped their retention. A tree cut down was perfectly healthy.
	16.3		reference to Linen Green and Seamus Heaney Centre do not appear to financially variable?
	16.7		conservation areas to be referenced and text expanded
	16.9		Moneymore old railway station?
	16.13		how would agriculture sheds be controlled. Guidance required in what is acceptable.
Page	Paragraph / Policy Number	Extract from document	Comments
	HE5 (and HE4)	Development proposals which will adversely impact upon archaeological remains of local importance or their settings will conflict with the Plan <i>unless it has been clearly demonstrated that the importance of the proposed</i>	Would have concerns about this. Needs to be more specific and robust.

		<i>development outweighs the value of the archaeological remains and/or their settings.</i>	
	16.32	Where development might reveal, disturb or destroy archaeological remains, it is important that the opportunities to record archaeological evidence are taken and that archaeological remains are not needlessly destroyed. The ability to record such archaeological evidence is not a factor in deciding whether controlled removal should be permitted.	This should be further clarified and should be rare.
	16.4		'too' should be 'to'
	16.43		superfluous bullet point
		LISTED BUILDINGS	what enforcement actions where demolished without consent, or allowed to delipidate to such an extent that demolition becomes the only viable option?
	HE 11		attaching of posters and adverts to rails of listed buildings? What actions are proposed?
	HE12 16.63		trees and others features in conservation areas? Clarification required
	16.76		there is a good example of a railway station in Moneymore. It should be referenced and included.
Page	Paragraph / Policy Number	Extract from document	Comments
	NH5		retaining trees was not applied in Moneymore
	18.2		is it appropriate to be as specific as this? Also flood risk is very specialised and plan will, it is assumed, be subject to expert examination?

	FLD 2	New development will be required to demonstrate that there is adequate drainage to accord with the plan. A Drainage Assessment will be required for all development proposals that exceed any of the following thresholds: <ul style="list-style-type: none"> • A residential development comprising of 10 or more dwelling units; • A development site in excess of 1 hectare; or • A change of use involving new buildings and / or hard surfacing exceeding 1000 square metres in area 	if in a flood plain there should be limiting or maximum no number of units specified, to mitigate against developers submitting accumulatively.
	20.5	There are also a number of other utilities such as gas, water and the provision of cemeteries. It is important that such utilities which serve our community can be permitted, but not at the expense of our environment. For example, development, which often involves the erection of high structures, can have a negative impact on the landscape or the character of the area as well as on sites of natural or built heritage and nearby residential amenity.	Is a cemetery a utility? It seems an unduly insensitive way of describing it.
	20.8		Wind turbines should be more extensively limited - banned even - in areas of natural beauty.
Page	Paragraph / Policy Number	Extract from document	Comments
	20.8		Hight restrictions alone on wind turbines are insufficient in areas of natural and outstanding beauty.
	RNW 1		is 'cautious approach' sufficiently robust at term to control inappropriate proposals?

	21.23		are these dimensions for separating from dwellings adequate. On what basis? What about neighbours. The options to by-pass the policy implicit in the wording. Needs to be more robust.
	22.5		disused railways have tourism potential and maybe required for new railways in future.
	22.7		Moneymore by-pass to be included re A29
	22.10		here is already an unofficial by-pass through Moneymore/Coagh and Stewartstown to get to M1
	22.13		Coalisland omitted
	PT 5		rationale for 12 miles
249			Monitoring of plan: 30% - 60% is too wide a target to be meaningful. It should be higher to encourage the development in towns and minimise development in the countryside
250			creation of 8,500 new jobs. What is the scientific basis for this linked to demographics, skills base, education and immigration projections.
261			advertising signs - reference conservation area criteria
Page	Paragraph / Policy Number	Extract from document	Comments
269			advertising signs - reference conservation area criteria
272			ASAI to be defined
262			road safety to be a consideration for certain adverts.

			Control should be extended to inappropriately bright and intrusive mobile adverts that are unduly distracting. Some siting very inappropriate such as at Bridger Street Moneymore where the amenity of the adjoining dwellings was adversely affected, in particular the ones nearest the advert site
275			'shared environmental' to be defined

Submitted on behalf of the UUP Group on Mid Ulster Council
 Cllr Trevor Wilson
 Group Leader
 19th April 2019

