

**Elaine Mullin**

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**From:** Aidan Campbell [REDACTED]  
**Sent:** 17 April 2019 17:07  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** Representation from Rural Community Network on Local Development plan Strategy 2030 Draft plan Strategy  
**Attachments:** Representation to Mid Ulster District Council Local Development Plan 2030 final draft.docx

Find attached Rural Community Network's representations to the Draft plan Strategy.  
If you require further information on any of the issues raised don't hesitate to contact me.

Can you acknowledge receipt of this representation by return email please?  
Thanks

Aidan

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**Representation to Mid Ulster District Council Local Development Plan  
2030 -Draft Plan Strategy**

Draft Plan Strategy

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## Representations:

### Policy HOU2 Quality Residential Development

We welcome the provision made for a mixture of house types and tenures providing accommodation accessible to everyone including people with disabilities.

Paras 7.26 -7.27 We support the intention of the policy to meet the needs of all by providing a mixture of house types and tenures. However the proposals will only place a planning condition on residential developments of 25 units or more or on sites of 1 Hectare or more.

No provision is made under this policy for imposing a similar planning condition on smaller sites so this provision will have no impact on meeting the needs of all in smaller towns and villages where sites will be substantially smaller than the 25 unit/1 hectare threshold.

Furthermore the policy stipulates a minimum percentage of 25% of social and affordable units in sites with 50 or more dwellings or 2 hectares or more. No minimum is set for a 1 hectare site with the plan simply stating that there should be a mix of house types with no reference to a mix of tenures.

The plan does not address the problem of the phasing of development to allow applications to be submitted under the threshold to avoid these planning conditions so undermining the policy intention.

We believe this proposal is unsound in that it fails to meet the CE1 test on coherence. The setting of the threshold at 25 units or 1 hectare, in effect, means that a mixture of tenures will be less likely in smaller towns and villages. The absence of a reference to social and affordable housing and the failure to set a percentage threshold for 1 hectare sites when a specific threshold of 25% social and affordable units for larger sites is incoherent.

RCN is concerned that Housing Associations across Northern Ireland are failing to develop social housing in rural communities. Across Northern Ireland the NI Housing Executive sets an annual target for new build social housing in rural communities to reflect the level of housing need in rural areas on the Housing Executive waiting list and this usually fluctuates between 10%- 12% of the overall social new build programme.

### Missing the Rural Target

Year	Rural new build target	Actual units started
2014-15	190	119
2015-16	147	148
2016-17	166	84
2017-18	189	144

The Draft Plan Strategy points out that Mid Ulster is an overwhelmingly rural district with 72% of the population living in the rural area (using the definition of rural as laid out by the Inter-departmental Urban Rural Definition Group). The Mid Ulster Draft Plan Strategy

should encourage and actively support the development of social and affordable housing in rural communities where such housing need exists.

### **Policy CT2 Dwellings in the Countryside**

Paras 8.51 – 8.56 We support changes to allow more one off housing in the countryside to facilitate housing for personal and domestic circumstances and to allow a dwelling for a carer. This is important in rural areas of mid Ulster where the population is ageing at a faster rate than in urban areas and where the care needs of citizens in the future is likely to increase.

Paras 8.40 - 8.43 We welcome the proposals on the conversion/re-use of existing non-residential buildings.

### **Policy CT3 Social and Affordable Housing in the Countryside**

Paras 8.64-8.65 We welcome this exception for groups of dwellings in the countryside adjacent to or near a village or small settlement to provide social rented and intermediate housing. This may help offset the difficulties social housing providers face in competing with private developers for development sites within settlement limits. We believe that the limit of 14 dwellings set by PPS21 may be restrictive in some cases and that the plan should allow planners the flexibility to examine each proposed application on a case by case basis depending on the need for social housing and the location and condition of the site.

### **Policy CT4 Dispersed Rural Communities**

We welcome the retention of the Dispersed Rural Communities designation in the Draft plan strategy. We also welcome the commitment at Para 4.46 that in preparing the Local Policies Plan consideration will be given to whether there are other locations in the District which could be defined as a DRC.

We believe the Council should consult with the communities in the Longfield, Slieve Gallion, Tirgan, Inishcarn Road and Keenaught areas to ascertain whether they would support the designation of a further DRC in this area.

### **Addendum Position Paper on Public Utilities**

#### **Revised WWTW Capacity Figures**

RCN is also concerned that waste water treatment capacity is a limiting factor for development in many smaller rural settlements where housing need is present and development may be required over the plan period. 15 waste water treatment works are identified as having no capacity and where new connections will be refused. This issue, which is evident in some areas of Mid-Ulster, has the potential to reduce the viability of many new build housing schemes particularly smaller schemes where social housing could be developed. The draft plan strategy should consider zoning additional or bigger land parcels for housing where there are WWTW capacity issues so that alternative solutions such as reed beds (which take up more room) are a feasible option for both private and social housing developments.