

ANNEX B – Response Pro-forma

Name: HILDA CLEMENTS

Address: 16 high street, omagh, bt78 1bq


Original Representation Reference Number: MUDPS/89 (for administrative use only)

Please tick the applicable box below.

- a) I confirm that I wish for my original representation to be considered as my representation.

- b) I confirm that I wish to amend or add to my original representation.

- c) I confirm that I wish for my original representation to be withdrawn and that I no longer wish to make a representation.

Signature: ...  **.....**

Date: 18 - 3 - 2020 **.....**

If you require assistance when completing the above, please contact developmentplan@midulstercouncil.org

Please ensure you return this completed Pro forma (along with any additional documents if you have ticked [b]) above) to Development Plan Team, Planning Department, Mid Ulster District Council, 50 Ballyronan Road, Magherafelt, BT45 6EN, by 5pm on 21st May 2020.

Elaine Mullin

From: Hilda Clements <[REDACTED]>
Sent: 18 April 2019 13:53
To: DevelopmentPlan@midulstercouncil.org
Cc: Sinead McEvoy
Subject: FW: Mid Ulster Local Development Plan 2030 - Draft Plan Strategy Consultation
Attachments: Response to Mid Ulster dPS 180419.pdf

Dear Sir/Madam,

Please find attached response on behalf of Fermanagh and Omagh District Council.

(Re-sent with apologies as response was not attached to previous email)

Best Regards,

Hilda Clements
Principal Planner
Fermanagh and Omagh District Council
Planning Department
16 High Street
Omagh
BT78 1BQ
☎ 0300 303 1777
✉ [REDACTED]

DISCLAIMER Fermanagh and Omagh District Council W: www.fermanaghomagh.com T: 0300 303 1777
E: info@fermanaghomagh.com This electronic message contains information from Fermanagh and Omagh District Council which may be privileged or confidential. The information is intended to be for the sole use of the individual(s) or entity named above. If you are not the intended recipient be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this electronic message in error, please notify us by telephone or email (to the number or email address above) immediately. Personal information provided to the Council will be processed in accordance with current data protection legislation – for more information visit our privacy section at www.fermanaghomagh.com/your-council/privacy-statement/

Your Ref
Our Ref
Date 18th April 2019
Email planning@fermanaghomagh.com



Brendan Hegarty
Chief Executive

Ms Sinead McEvoy
Head of Development Plan
Mid Ulster District Council Planning Department
50 Ballyronan Road
Magherafelt
BT45 6EN

Dear Sinead,

Re: Mid Ulster Local Development Plan 2030 – Draft Plan Strategy Consultation

I refer to the above consultation and email received on 22nd February 2019.

Fermanagh and Omagh District Council welcomes the opportunity to respond to the consultation and wish to congratulate Mid Ulster District Council in achieving this key milestone in the LDP process. We also wish to acknowledge the lead role played by Mid Ulster in instigating the two cross boundary working groups, the Sperrins and Cross Border Forums, of which our Council is a member. We look forward to continuing to work together on addressing key issues affecting both our respective districts.

Having reviewed the document, Fermanagh and Omagh District Council have noted and where appropriate, commented upon the Draft Plan Strategy under the following headings which are areas of mutual interest and common ground as discussed at the two forums:

Meeting Peoples Needs/Accommodating Growth

We note Mid Ulster's Spatial Planning Framework (SPF) which has been formulated to help achieve the Plan Objectives and that planning policies will be formulated to accord with them. As stated in the draft Plan Strategy document, the District has a requirement of 11,000 new homes over the plan period and, in keeping with the RDS, the focus of growth will be within the three main towns/hubs of Cookstown, Dungannon and Magherafelt. Whilst the Spatial Planning Framework (SPF 2) allocates 60% of this HGI to the three towns, the allocation appears to be between 30% and 60% as indicated in Appendix 1. It is acknowledged that at present less than 30% of the District households are located in the three towns and that in order to ensure land availability over the plan period at a level not below 30% of the District's HGI, additional land will be made available as part of a phased approach to land release.

For the local towns and villages, the focus is one of consolidation and the level of growth allocated to each settlement will be proportionate to the number of households as based on the 2011 Census. For small settlements, the approach is to provide a proportionate number of houses in line with each settlement's size and this is likely to be, in the main, up to around a dozen.

We note that an allocation of the District HGI has not been made to the countryside and instead housing development will be monitored. For review purposes, if the number of houses being

approved in the countryside exceeds 40% (the District's share of households in the countryside), this will trigger the need to change policy at the Plan Review. We would query how this relates to the HGI which is normally linked to the monitoring of the number of dwelling completions. The Plan Strategy also introduces two strategic Rural Industrial Policy Areas (RIPAs) in the countryside – Tullyvannon and Desertcreat – in order to protect and consolidate existing areas of rural industry uses. It is noted that these are not zonings and have been selected on the basis of specific criteria.

In terms of economic development, the Spatial Planning Framework identifies the provision of at least 170 hectares of economic development land, to be distributed evenly between the three main towns. This includes an additional interim supply of land identified at Dungannon and Granville.

We have also noted the retention of existing Dispersed Rural Communities (DRCs) at Broughderg, Carntogher and Sixtowns and that the role of these is to support rural regeneration in remoter areas (SPF 7). Other locations may be defined as DRCs in the Local Policies Plan. The policy (CT4) will however be subject to review to ensure that it is a response to low development pressures and if these areas become subject to more development pressure, the policy will be removed.

We support the Draft Plan Strategy's adoption of a town centre first approach and a retail hierarchy which is in keeping with the SPPS.

Road Linkages and Transport Infrastructure

We are supportive of SPF 9 to encourage improvements to public and private transportation provision including railway lines and upgrading of the road network. This is further articulated in the Transportation section which acknowledges the predominantly rural population of the District, high reliance of the private car and limited access to public transport. These are characteristics shared with Fermanagh and Omagh and we agree with the approach for transportation and the facilitation of a strategy that suits the needs of Mid Ulster as a rural District. Improving connectivity and reducing travel time are key to this along with the provision of by-passes for Cookstown and Dungannon which will help reduce congestion in the town centres.

We welcome Policy TRAN 2 Disused Transport Routes which ensures that such disused routes as railway lines and canals can be reused for recreational, nature conservation or tourism use.

Protection of Sensitive Landscapes

We are also supportive of SPF 10 which is to facilitate the protection of vulnerable landscapes and conservation interest from inappropriate and over dominant development while promoting adequate provision of open space and landscaping integrated with broader green and blue infrastructure.

The Plan introduces Special Countryside Areas (SCAs) at Lough Neagh/Lough Beg, at Slieve Beagh and in the High Sperrins and within these areas there is presumption against new development in order to protect the quality and unique amenity value of these unique landscapes. The policy exceptions are noted, particularly for communication apparatus where the proposal is to serve a recognised 'not spot' i.e. a location where there is no telecommunications coverage at all, and for the provision of essential electricity transmission or supply infrastructure within Slieve

Beagh and the High Sperrins, both of which adjoin our District. Whilst we do not have an equivalent designation of SCA on that part of the Slieve Beagh which falls within our District, the ACMD designation in our Draft Plan Strategy would apply.

In addition to the designation of SCAs, the Plan has an additional layer of protection in the form of an Area of Constraint on Wind Turbines and High Structures (AOCWTHS). This is aimed at protecting the most prominent landscapes in the Sperrins, Clogher Valley and Slieve Beagh which are all sensitive to high structures. The normal restriction for telecommunications development, overhead cables and high structures will be 15 metres in height with exceptions only permitted up to 25 metres in height for essential electricity lines. In the case of wind turbines as covered by the Renewable Energy policy (RNW 1), the height maximum is restricted to 15 metres to hub height. This is to restrict large wind turbines and other high structures in elevated and prominent ridges and slopes.

You will be aware that our Draft Plan Strategy contains a Wind Energy Strategy which identifies the capacity of different landscape areas for wind energy development. This strategy is underpinned by a commissioned Landscape Wind Energy Capacity Study which identified 'limited or no capacity' for turbines within the Sperrin AONB given its designation as a nationally valued landscape. Where some locations may be suitable for single or small turbine groupings - such as within the more enclosed parts of valley landscapes - the turbines would be limited to the 'medium' size (<80m). The study also concluded that there was limited remaining capacity in LCA 17 Clogher Valley Lowlands and LCA 18 Slieve Beagh. However, it was acknowledged that the Special Protection Area (SPA) designation covering much of LCA 18 may also be a significant constraint in relation to natural heritage rather than landscape character.

In relation to the Sperrin AONB, it is noted that specific policies such as those for high structures and mineral development, will be dealt with under separate policy consideration (Policies RNW1 and MIN1).

The Council also welcomes the policies relating to Beaghmore Stone Circles and Creggandevosky Areas of Significant Archaeological Interest (ASAI) which are important shared environmental assets. The main part of Creggandevosky ASAI falls within our District whilst we have a small extension to Beaghmore ASAI.

Mineral Development

Minerals development is an important activity in both our districts and it is acknowledged that Mid Ulster is the leading producer of sand and gravel in Northern Ireland.

We support the Plan's introduction of Areas of Constraint on Mineral Development (ACMDs) into parts of the District to protect areas such as Beaghmore and the High Sperrin's which are of intrinsic landscape amenity, scientific and heritage value.

We have also noted Policy MIN 3 Valuable Minerals and Hydrocarbons which appears to take a slightly stricter approach to the exploration and extraction of valuable minerals than is currently set out in the SPPS.

The policy on Mineral Reserve Policy Areas (MIN 1) is also noted and that these are areas designated due to their important deposits of local minerals and would appear to be largely based on the designations previously contained within the Cookstown and Dungannon Area Plans.

In relation to the policy on peat extraction (Policy MIN 4), you will be aware that the approach taken in our Council's Draft Plan Strategy is not to permit commercial peat extraction and we do not allow for exceptions. However, we are supportive of the above policy which is line with the SPPS.

Tourism

We are supportive of the tourism strategy which is in line with regional policy as it seeks to attain sustainable tourism development through a balance between meeting the needs of the tourist coupled with the need to conserve tourist assets and the environment. The designation of Tourism Opportunity Zones (TOZs) and Tourism Conservation Zones (TCZs) will assist in achieving this and it is noted that such areas have been designated within the Sperrin AONB. We have not identified such areas in our District although we do refer to Tourism Hubs in the countryside - clusters of existing tourism development associated with a tourist attraction – where tourism development will be directed to, outside of settlements.

We also note Policy TOU 2 Resort Destination Development which provides for a proposal for a major tourism development which would act as a resort destination providing both accommodation and major leisure facilities.

Protection of River Corridors and the Ulster Canal

It is noted that Policy OS 2 affords protection of river corridors and applies to five main rivers including Owenkillew which traverses both our Districts. Both the Cross Border and Sperrin Forums recognise river corridors as important assets for recreation, nature conservation and general public enjoyment as well as performing their primary function of providing for the storage and conveyance of flood-water during times of flood. The policy also applies to the River Blackwater which forms a section of the Ulster Canal which traverses from Mid Ulster through County Monaghan, culminating at Upper Lough Erne. Reopening of the Ulster Canal could extend the navigation from the Shannon-Erne Waterway to Lough Neagh and down the Bann river to the north Antrim coast.

Fermanagh and Omagh's Draft Plan Strategy included a similar policy (OSR05 Development Adjacent to a Main River) as well as a separate policy on protection of the Ulster Canal.

Improvement to Broadband Infrastructure

The Plan Strategy also introduces a General Principles Planning Policy, Policy GP1 which underpins the other subject policy topics in the rest of the Plan. The criteria in the policy represents those considerations which normally apply to a range of different types of proposals. Included under criteria (g) of this policy is a requirement to ensure that all major planning applications make provision for fibre optic cables within the development. In conjunction with Policy TOHS 1, the approach is to address the urban/rural imbalance which exists in relation to the use of broadband and mobile data through encouraging mast and site sharing where possible whilst at the same time protecting the most prominent landscapes in the Sperrins and in the Clogher Valley. Improving broadband and mobile telephone coverage are problems that both our districts experience, particularly in remoter, rural areas.

In conclusion, Fermanagh and Omagh District Council considers that the contents of your Draft Plan Strategy are not in conflict with our own Council's Draft Plan Strategy, although we recognise that in addressing specific issues such as minerals development and wind energy development in the Sperrin AONB, our policy approaches have developed slightly differently.

We will continue to liaise and consult with your Council at the appropriate stages of our LDP as well as continuing to engage with you and your Planning Officers through informal meetings and through the Sperrins and Cross Border Forums.

Yours sincerely



Hilda Clements
Principal Planning Officer
Development Plan