



Mid Ulster

Position Paper – Development Pressure Analysis

September 2015

Prepared by Mid Ulster Environment and Conservation Development Plan Team.

Development Pressure Analysis of Mid Ulster Council

Purpose: To provide members with a Development Pressure Analysis for Mid Ulster Council to identify those areas where significant development pressure has occurred and/or where local rural character is under threat.

Content: The paper provides information on:-

- (i) The Development Pressure Analysis for Mid Ulster District and its key findings;
- (ii) Identifies the areas within the district where significant development pressure has occurred due to cumulative impact of one off single dwellings and also wind energy development;
- (iii) The development pressures in the context of the environmental designations and landscape character of the district.

Recommendation: That the Planning Committee notes the contents of this paper in relation to development pressure within the Mid Ulster District.

1.0 Introduction

1.1 This Development Pressure Analysis is one of the 4 strands of the Countryside Assessment. Following on from the identification of environmental assets, settlement appraisals and landscape assessment, it seeks to identify those areas where significant development pressure has occurred and/or where local rural character is under threat of significant change. Development pressure analysis typically involves an assessment of the cumulative impact of one-off single dwellings in the countryside. Given the high number of wind energy applications in recent years and their potential visual impacts, Mid Ulster District Council has decided to widen the remit to also include an assessment of wind energy development.

1.2 It is acknowledged that other types of development, such as mineral excavation or industrial buildings, can also have potential adverse visual impacts. It is considered however that sufficient control is already provided by prevailing regional policy, or will be provided within specific policies contained within the Local Development Plan, to prevent any significant change to local rural character from these types of development.

- 1.3** This rural pressure analysis therefore focuses specifically on the impact of single dwellings and wind energy developments on the Mid Ulster countryside. The countryside is defined as lands outside of designated settlements as illustrated in the existing Magherafelt Area Plan 2015, Cookstown Area plan 2010 and the Dungannon & South Tyrone Area Plan 2010.

Single Rural Dwellings

- 1.4** Following a request by Mid Ulster Council, the Department of the Environment (DOE) has provided records of planning decisions (approvals, refusal and withdrawals) issued for all single rural dwelling applications (Outline, Full and Reserved Matters (RM)) in the Mid Ulster countryside for 4 year period 01st June 2010 - 31st May 2014. This period corresponds with the first 4 years following the introduction of current rural planning policy PPS 21 Sustainable Development in the Countryside. In this 4 year period, it is considered that PPS 21 has been become sufficiently 'bedded in' to allow emerging trends to be highlighted and identified.

Background

- 1.5** Prior to undertaking an analysis of the impact of PPS 21 it is useful to understand trends from preceding years experienced under previous policies. PPS 21 arrived in June 2010 approximately 4 years after its predecessor draft PPS 14 was introduced. Figure 1 and table 1 below provides a summary of all rural single dwelling decisions (Outline, Full and RM) issued between June 2004 and May 2014. During this ten year period, proposals for rural dwellings were primarily influenced by Planning Strategy for Rural Northern Ireland (1993), followed by draft PPS 14, Draft PPS 21 and final version of PPS 21.
- 1.6** It can be seen from both Figure 1 and Table 1 that since 2007 there has been a general downwards trend in the volume of single rural dwelling decisions made throughout the district. Prior to 2007-2008 single dwelling applications (Full, RM and Outline) were being processed at a rate of approximately 2760 per year across the district. To put this in context, this figure exceeds the number of applications decided during the first 4 years following the introduction of PPS 21. Figure 1 also illustrates how the number of decisions has steadily declined since 2010.

Table 1: Planning Decisions for Rural New and Replacement Single Dwellings (Full, RM and Outline) in Mid Ulster 2003-2014

YEAR	Approvals	Refusals	Withdrawals	Total
2003-04	1568	93	351	2012
2004-05	2147	209	480	2836
2005-06	2014	501	590	3105
2006-07	2148	766	176	3090
2007-08	1383	137	165	1685
2008-09	1343	18	67	1428
2009-10	1198	24	61	1283
2010-11	837	184	23	1044
2011-12	563	56	16	635
2012-13	415	33	26	474
2013-14	459	25	15	499
Total	12,075	2,046	1619	28,734

Source : DOE Statistics

- 1.7** Between 2012 and 2014, when it might be said that PPS 21 was ‘bedded in’, the average number of applications decided per year for the whole district was 487. Again, to put this in context, this amounts to almost one sixth of the total number of rural single dwelling applications decided in the 2006-7 year.
- 1.8** The peaks of 2005-2008 are reflective of the high volume of speculative proposals submitted in anticipation of a revised rural policy i.e. Draft PPS 14 (March 2006) and the economic conditions that prevailed at that time. The sharp increase in decisions in November 2007 may be explained by the large number of withdrawals following re-issuing of draft PPS21 by the Department of Regional Development. The graph also shows an increase in decisions between July and October 2010. This coincides with the adoption of the final version of PPS 21 in June 2010 and may be explained by decisions issued on applications being withheld pending its final adoption.

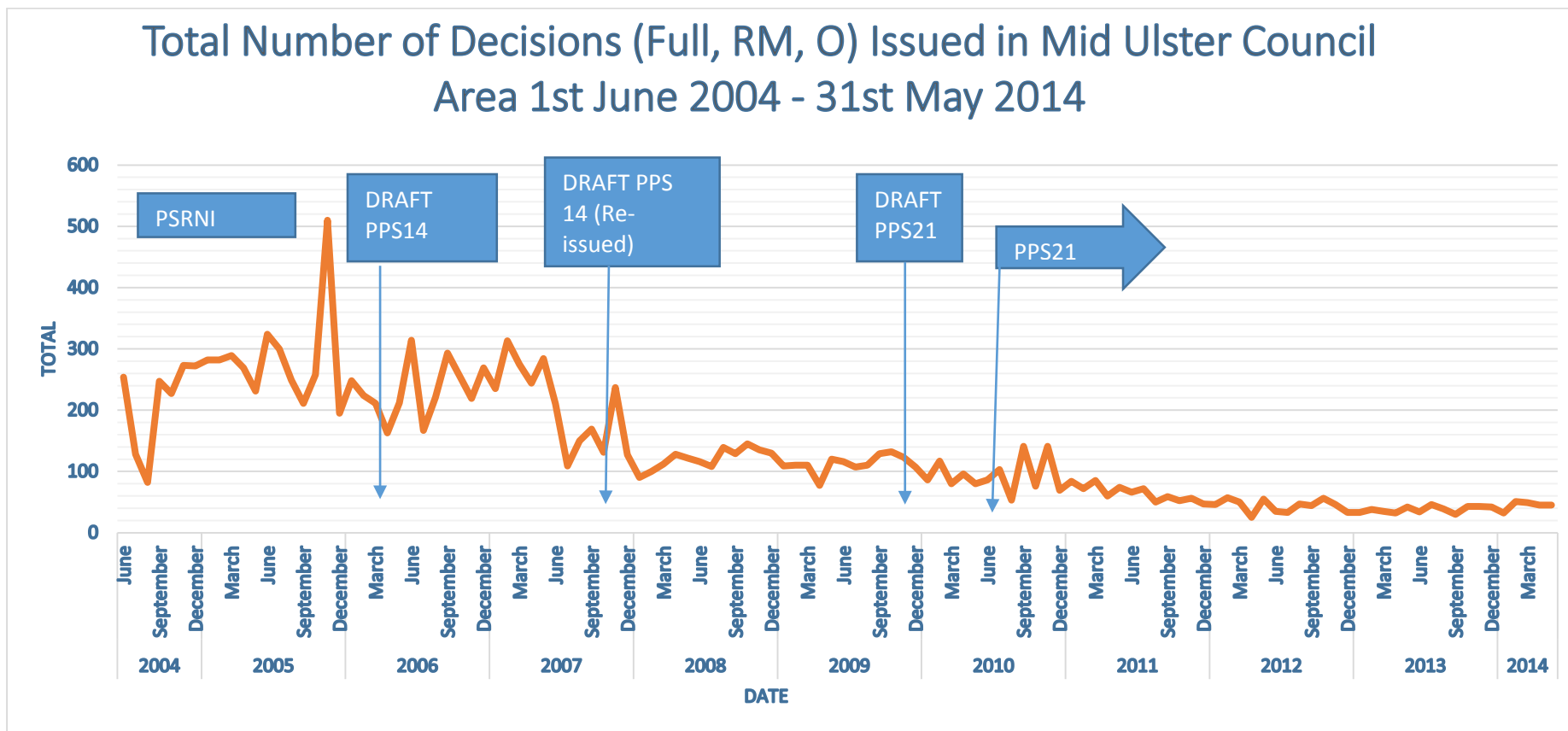


Figure 1
Source : DOE Statistics

Analysis of PPS 21 Decisions June 2010 – May 2014 - Methodology

- 1.9** All rural new and replacement single dwelling application decisions i.e. approvals, refusals and withdrawals of Outline, Full and Reserved Matters applications, have been identified through DOE statistics and plotted as a 'dot map' (See Map No. 1). Applications which fall on the same site will show as one dot only at the scale displayed. In order to give as accurate a picture as possible as to the impact of PPS 21 policy throughout the 4 year study period. The statistics have been cleansed to exclude those decisions issued post June 2010 that could be linked to previous rural planning policy Planning Strategy for Rural Northern Ireland.
- 1.10** It can be seen from the dot map that certain patterns have emerged in terms of the number, location and geographical spread of decisions for single dwelling rural applications across the district. It is considered that the different levels of pressure can be categorised into 3 broad categories; higher, medium, and lower pressure areas. For ease of reference, these areas are illustrated on Map No.2 as follows;
- Lower pressure areas – hatched in green
 - Medium pressure areas – hatched in orange
 - Higher pressure areas – hatched in red.

Variations in Development pressure

- 1.11** *Higher Pressure Areas include;*
- Lough Shore Communities i.e. lands in close proximity to the lough Neagh Shores, including ;
 - Lands between Dungannon and Coalisland and between Coalisland and lough Neagh
 - Lands extending from Clonoe/Dernagh to Killeen to Brockagh/Mountjoy along the Mountjoy Road.
 - From Brockagh to Coagh along Kilycolpy and Drumconvis Roads, and lands east of, towards Ardboe, Moortown and Ballinderry,
 - Lands on either side of the B18 Springhill Road that connects Coagh to Moneymore
 - From Coagh to Loup along the B181 Springhill Road and lands east of
 - From Loup to The Woods to Ballymaguigan and lands east of.
 - Lands between Ballymaguigan and Creagh along the Ballyronan Road B18
 - From Castledawson to Bellaghy and further north towards Ballynease.
 - Lands between Dungannon and Coalisland.
 - Lands north and south of the Cookstown to Omagh Road (A505).
 - Lands to the west of Tobermore as far as the edge of the Sperrins AONB.
 - Lands on either side of the A29 between Maghera and Swatragh.

- Lands north and south of the A42 between Maghera and Glenone.
- Lands north and south of the A4 between Ballygawley and the Moy, extending as far south as Benburb and as far east as The Moy.

1.12 *Medium Pressure Areas include;*

- The majority of the Clogher Valley area i.e. northwest and southeast of the A4 between Fivemiletown and Ballygawley.
- A swathe of land across the middle of the district from Pomeroy in the east, to the south and east of Cookstown extending northwards beyond Moneymore as far as Magherafelt.
- A small pocket at the south eastern corner of the district between the M1 Motorway and the A29 Dungannon-to-Moy road.
- The north-eastern tip of the district.

1.13 *Lower Pressure Areas include;*

- The Sperrins AONB.
- The escarpments that overlook Clogher Valley, incorporating part of Brougher Mountain to the north and Slieve Beagh Ramsar/SPA/SAC (incorporating 8 no. ASSI designations) to the south.
- Lands south west of the A5 Protected Route, from Caledon to Aughnacloy along the Blackwater River Valley.
- Lands south of Maghera between the A29 and A6 protected routes, incorporating Ballynahone Bog Ramsar/SAC/ASSI's

These pressure areas have been categorised in the context of a 4 year analysis period of data and may not necessarily translate as being excessive or significant.

2.0 Single Housing - Analysis

2.1 The analysis shows that a total of 2633 Outline, Full and RM planning applications for single rural houses (including replacements) were decided by the Department of the Environment in the 2010-2014 period. Of these, 927 were within Magherafelt, 686 were within Cookstown and 1020 were within Dungannon. 86% (2274) were approved, 11% refused (290), and 3% were withdrawn (80).

2.2 Map No.3 illustrates the geographical spread of single dwelling decisions in the context of vulnerable landscapes identified as part of the Landscape Assessment. This map suggests that areas within the district that are valued for their high scenic value or natural heritage importance such as the high Sperrins and Slieve Beagh have experienced less pressure for single house developments than the remainder of the district. Although it is acknowledged that this may more likely be a reflection of the adverse conditions for human settlement, as opposed to the impact of planning policy, it may be safe to assume

that these areas are not under threat of significant change if the current PPS21 policy is retained.

- 2.3** It should be noted that ‘higher pressure’ areas identified as part of this analysis does not necessarily translate as being excessive or inappropriate in the local context. For example, lands located west of Lough Neagh fall within an area experiencing a comparatively higher level of development pressure. The majority of this area however lies outside those areas identified as being particularly vulnerable to change within the Landscape Assessment. The cumulative impact of one off dwellings within this landscape has been offset by its greater capacity to absorb higher levels of development and this higher level of pressure reflects the strong vibrant rural community that exists in this area. In order to ensure that adequate support is provided to this vibrant rural community it can be determined that the continuation of PPS 21 would further strengthen this community without demonstrable harm to the landscape. Indeed it may be appropriate to consider the option of the introduction of a ‘Dispersed Rural Community’ designation in this area, wherein controls on rural housing may be eased to allow for sympathetic housing development.
- 2.4** Map no. 3 helps illustrate those areas that are experiencing a higher degree of development pressure which also fall within identified vulnerable landscapes. This includes areas such as the Lower Bann Valley, large parts of the Dungannon Drumlins, lands between Coalisland and the Lough Shore and lands west of Draperstown, all of which share similar levels of development pressure. Given the generally low rate of approvals since PPS 21 was introduced, the concentrations of applications in these areas is not considered to be particularly significant.
- 2.5** In addition there are a number of factors specific to each of the above mentioned areas that contribute to their ability to absorb further development without causing demonstrable harm to each area. When considered in detail the area of higher pressure within the Lower Bann Valley is for the most part located near the main arterial routes, the A6 and the A42 and also to the north of Bellaghy. The NILCA 2000 document advises that of the Lower Bann Valley the extensive wetland fringes of both loughs are the most sensitive to change and as Map 3 demonstrates, the fringes of the loughs have experienced relatively low numbers of planning applications.
- 2.6** The Dungannon Drumlin and Hills is an extensive area within the district that is characterised by large scale drumlins. As a result the views both into and out of this area are interrupted by topography and vegetation, resulting in relatively short term views. Whilst this area has experienced higher levels of planning applications the landform is such that it has the capacity to accommodate the level of development, at its current rate of growth without the need for a change in policy.

- 2.7** The area identified between Coalisland and Lough Neagh as experiencing higher levels of development is located within the Lough Neagh Peatlands area. The NILCA Landscape Character Assessment advises that the most vulnerable area is the lough shore fringes. It also points out that whilst this area is particularly sensitive to vertical elements, such as wind turbines, it is capable of accommodating development in small groupings when contained within existing planted areas.
- 2.8** On closer inspection the higher level of development to the west of Drapersfield can be seen to centre around the main road network on the fringes of the Sperrins. Importantly the more sensitive upper slopes of the Sperrins have experienced relatively few numbers of planning applications.
- 2.9** Given the specific factors identified above of the areas of Vulnerable Landscapes experiencing higher levels of pressure, coupled with the levels of planning approvals under PPS 21 the circumstances are such that there is little evidence from this analysis to suggest that these particular areas would suffer a disproportionate detrimental impact if current policy is allowed to remain for the plan period.
- 2.10** It is considered that the Lough Neagh Fringes, i.e. the area immediately adjacent to the lough shore, can be distinguished from the broader Western Lough Neagh Shore area given it's more scenic and sensitive landscape and the number of environmental designations that affect it. It may therefore be an appropriate measure to introduce a protection area at the fringe of the Lough to conserve this environmentally sensitive area and protect it from inappropriate development.
- 2.11** The analysis also highlights the area between Coalisland and Dungannon as experiencing a higher degree of development pressure. Given their close proximity to one another and the existence of intervening settlements, Edendork (2 nodes) and Bush, the perception of coalescence in this area is heightened. It cannot be concluded with any real certainty however, that the threat of coalescence has significantly increased as a result of PPS 21 or that it is likely to happen over the plan period if current policy is retained. To date, the number, location and spread of decisions is such that a bespoke policy response would not be justified for the forthcoming plan period.
- 2.12** The trends highlighted above are largely based on a desktop assessment only. It is suggested that a more detailed assessment, including complementary field survey work would be required in order to justify the introduction of a stricter policy regime in certain areas, or relaxation in others as the case may be.

3.0 Wind Energy Development - Analysis

- 3.1** Mid Ulster Council requested statistics from DOE on planning decisions issued for all single wind turbines and wind farm applications issued within Mid Ulster District over a 6 year period between August 2009 and March 2015. This period

corresponds with the first 6 years following the introduction of Planning Policy Statement 18 Renewable Energy. All decisions have been identified through the DOE statistics and plotted as a 'dot map' (See Map No.4). Applications which fall on the same site will show as one dot only at the scale displayed.

- 3.2** Prior to PPS 18 Renewable Energy, applications for wind energy development were primarily influenced by Policy PSU 12 'Renewable Energy' of the Planning Strategy for Rural Northern Ireland. Stringent renewable energy targets however, as set by Department of Enterprise, Trade and Investment (DETI) formed the backdrop to a more permissive PPS 18 renewable energy policy being introduced. It is therefore not surprising, as can be seen from Table 2 and Figure 2 below, that there has been a sharp increase in approvals for wind energy development since its introduction in August 2009.

Table 2: Planning Decisions (Approvals and Refusals) for single wind turbines/wind farms in Mid Ulster 2002-2015

YEAR	Approvals	Refusals	Total
2002-03	0	0	0
2003-04	3	0	3
2004-05	3	0	3
2005-06	15	0	15
2006-07	10	0	10
2007-08	18	1	19
2008-09	8	5	13
2009-10	15	3	18
2010-11	18	4	22
2011-12	43	5	48
2012-13	91	10	101
2013-14	62	8	70
2014-15	70	6	76
Total	356	42	398

Source: DOE Statistics

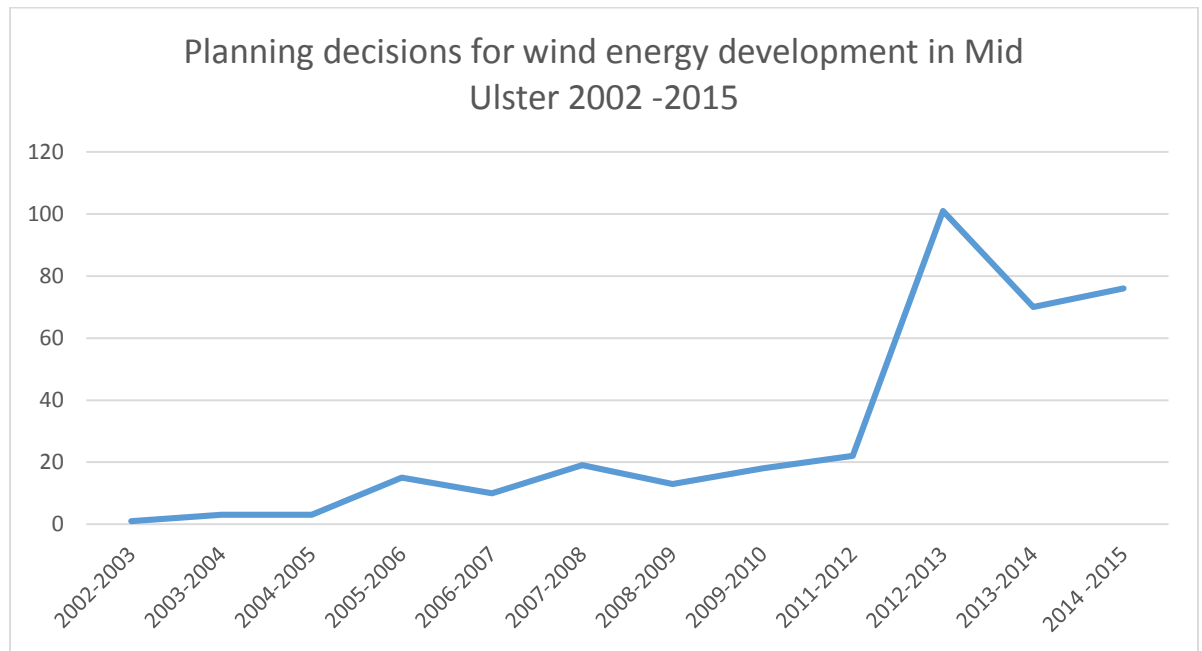


Figure 2

Source: DOE Statistics

3.3 At present in the Mid Ulster District there are 13 windfarm installations (consisting of more than one single turbine) which have received planning permission, and another two applications are currently under consideration by the DOE. This compares to a total of 126 planning windfarm approvals for Northern Ireland as a whole. In relation to single wind turbines, there are 356 approvals for such proposals in Mid Ulster, with 2445 in the whole of Northern Ireland¹. As of March 2015 there were 66 pending decisions on singles wind turbines within Mid Ulster compared 521 for Northern Ireland as a whole.

3.4 Map No.4 illustrates the geographical spread of single turbine and wind farm decisions across the Mid Ulster and Map No. 5 illustrates the spread of decisions in the context of vulnerable landscapes identified as part of the Mid Ulster Landscape Assessment. The following trends have been identified:

- The majority of wind **farm** approvals are located on the western portion of the district, often straddling the council boundary with Fermanagh and Omagh.
- Two wind farms are located within areas identified as vulnerable landscapes.

¹ DOE – Renewable Energy Statistics

- The area where the pressure from wind energy development is felt the most , falls outside identified vulnerable landscapes i.e. lands at Carrickmore Hills south of the main Cookstown- Omagh Road (A505) extending as far as Pomeroy and to a lesser extent Cappagh and Galbally.
 - Several smaller clusters of wind energy development pressure areas exist within vulnerable landscapes including a small pocket within the High Sperrins where several turbines and a small wind farm have been approved with several more single turbine applications currently pending. Lands surrounding Carntogher Dispersed Rural Community to the north of the district are also experiencing a small degree of development pressure. To a lesser extent, the lower Bann Valley and the higher escarpments overlooking Clogher Valley have experienced a moderate amount of pressure in terms of wind energy development.
 - Some areas that have experienced little or no pressure from wind energy development including large parts of the Sperrins AONB, lands south of A4 Ballygawley to Fivemiletown and lands south of the A4 Ballygawley to Dungannon
 - Elsewhere, there is fairly even distribution of single turbine wind energy development.
- 3.5** Broadly speaking, those landscapes identified as vulnerable have not experienced a significant amount of development pressure from wind energy development. It is important to note numerical pressure would not be the reason for the introduction of a more restrictive policy for wind energy. Even planning proposals for single wind turbines, telecommunications masts and other high structures have the potential to cause demonstrable harm to vulnerable landscapes, such as High Sperrins and Clogher Valley Escarpments given their wide visibility. It is in recognition of the potential damage that may be caused by high structures that such a bespoke policy should be considered to protect those landscapes for future generations. It is acknowledged however that that factors other than planning policy have influenced the geographical spread of wind technology across the district including, for example, the distribution of the viable wind resource, technical and economic constraints to the viability of exploiting different wind speeds and electricity grid access constraints.
- 3.6** There are no landscapes into which a wind farm or wind turbine will not introduce a new and distinctive feature. It is important however for society at large to accept them as a feature of many areas of the district for the foreseeable future. This is not to suggest that areas valued for their particular landscape and/or nature conservation interest will have to be sacrificed. Nor that elsewhere, attempts to lessen the impacts by integrating the development into the surrounding landscape would not be worthwhile. On the contrary, it emphasises the need for account to be taken of regional and local landscape considerations.

- 3.7** It is recognised that public attitude towards wind energy development is changing. The residents of the Mid Ulster District are however custodians of some of Northern Ireland's most important landscape areas including the Sperrin Area of Outstanding National Beauty (AONB). There are concerns regarding the proliferation of single turbines and resulting visual intrusion, safety and the increasing size and massing of turbines.

4.0 Conclusion

- 4.1** It is clear from the above analysis that the rate of rural housing approvals under PPS 21 is significantly less than that compared to previous rural planning policies, particularly under the Rural Planning Strategy. Furthermore, since its final adoption in June 2010, and having had a chance to 'bed in', the rate of rural approvals has almost halved.
- 4.2** Broadly speaking, the analysis suggests that areas within the district that are valued for their high scenic value or natural heritage importance such as the High Sperrins and the Clogher Valley, have experienced less pressure for single house developments than the remainder of the district. As such, it may be safe to assume that these areas are not under threat of significant change if the current PPS21 policy is retained and that a bespoke policy response is not necessary in this context.
- 4.3** It should be noted that identified 'higher pressure' areas do not necessarily translate as being excessive or inappropriate in the local context. For example, the Western Lough Shore area is a densely populated area that experiences a high demand for housing, reflecting the strong vibrant rural communities that exist there. The historical pattern of development in this area, combined with the landscape's greater capacity to absorb development, means that a continuation of similar trends of development would be less keenly felt than in other more vulnerable areas.
- 4.4** In such circumstances, the committee may wish to consider whether the existing planning policy is appropriate in this area or whether the option of the introduction of 'Dispersed Rural Community' designations, wherein controls on rural housing may be eased to allow for sympathetic housing development, is appropriate in this area. This would ensure that adequate support is provided to existing vibrant rural communities while at the same time minimising impact on rural character.
- 4.5** It is considered that the Lough Neagh Fringes can be distinguished from the broader Western Lough Neagh Shore area given that it's scenic and environmentally sensitive landscape. The Committee may therefore wish to consider if the introduction of a protection area in respect of all types of development at the Lough Neagh Fringes i.e. the area immediately adjacent to the lough shore, would be an appropriate response to this.
- 4.6** In terms of wind energy development, the analysis clearly shows that approvals of single turbines and wind farms have been on the increase since the introduction of PPS 18 in 2008, peaking at 101 in 2012-13. To a large extent,

those landscapes identified as being particularly vulnerable, have not experienced a significant amount of development pressure from wind energy development. There are some exceptions however, including for example, small pockets of pressure within the High Sperrins and surrounding Carnogher.

- 4.7** The Committee may consider the need for a bespoke policy response in identified exceptional landscapes, such as the more elevated Sperrins AONB Clogher Valley Escarpments given their wide visibility. Concerns have been previously expressed with regard to the proliferation of turbines within the Sperrins AONB and the potential negative impact on local tourism and neighbouring amenity. The introduction of Special Countryside Area Status may be an option to ensure that these areas are protected from potentially obtrusive wind energy development.
- 4.8** It should be noted however, that under current policy PPS 18, Northern Ireland is on course to meet the targets of 40% set out by the Strategic Energy Framework and 20% as set out by the NI Executive². Consequently, a more restrictive policy in this regard may hinder the progress made thus far and reverse the positive trends experienced to date.
- 4.9** Councils are expected under the Strategic Planning Policy Statement (SPPS), to bring forward a strategy for development of the countryside which reflects the aim, objectives and policy approach of the SPPS tailored to the specific circumstances of the plan area. The trends and key findings identified in the analysis above can be used to inform policies and proposals brought forward in the LDP.
- 4.10** The development pressure analysis shows little evidence of significant pressure across the district thus suggesting that PPS18 and PPS 21 have been generally effective, with some exceptions, in maintaining rural character. If these policies or similar are retained over the plan period then it is anticipated that they will not conflict with strategic objectives. Exceptions include the Lough Neagh Fringes, where it is recommended that an area of protection is introduced to conserve the Lough Shore. In addition it recommended that an area of protection is introduced to conserve the character of the High Sperrins and Clogher Valley Escarpment from inappropriate wind energy development.

5.0 Recommendation

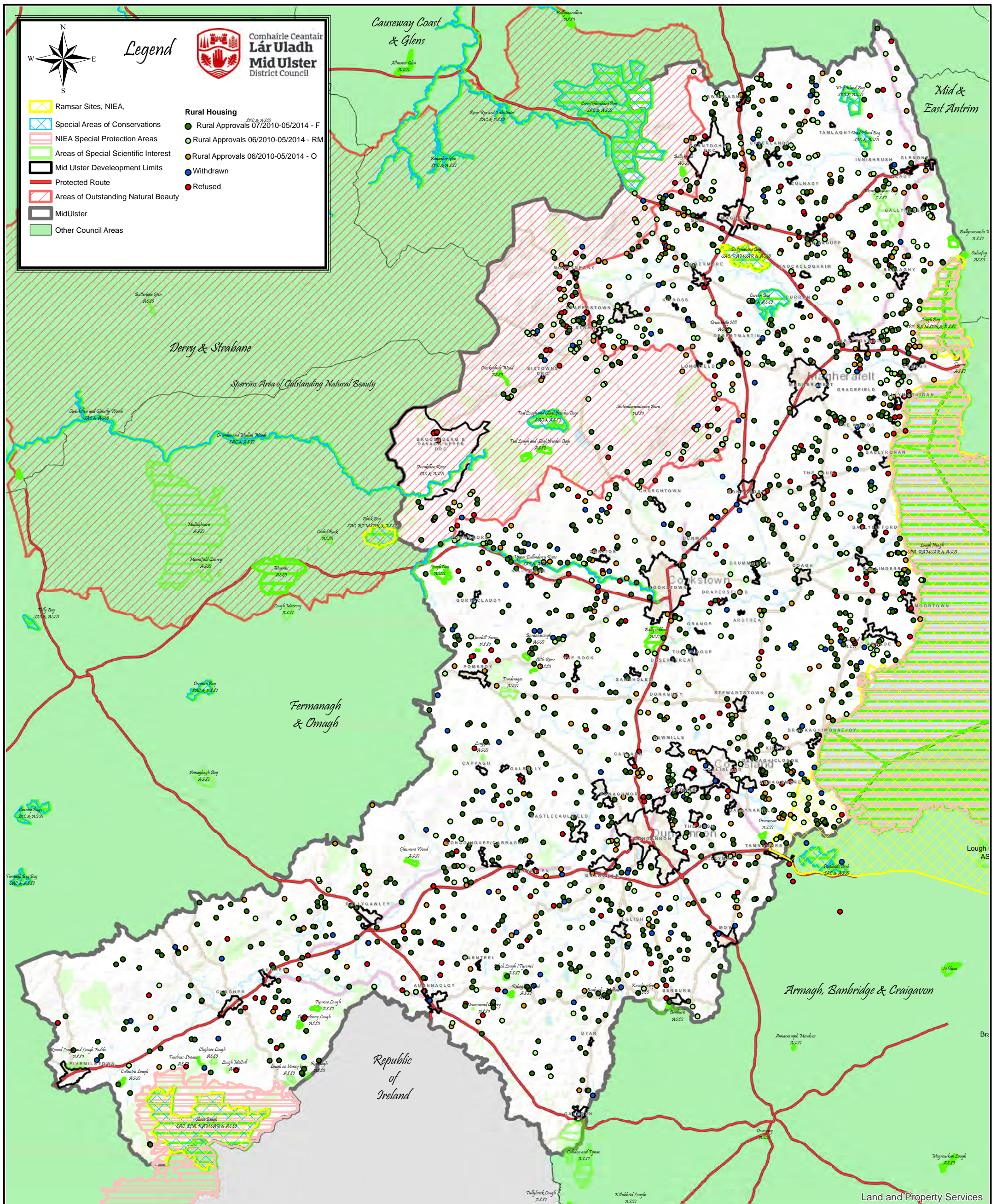
- 5.1** This paper was written to reflect the current position within the Mid Ulster District Council area as of September 2015. It is recommended that;
- i. This paper is taken into account when reviewing countryside planning policies and those relating to renewable energy;

² DETI-Statistics on Electricity Consumption and Renewable Generation in Northern Ireland- September 2014. The Executive's Programme for Government target to "Encourage achievement of 20% of electricity consumption from renewable sources by 2015" and the Executive's Strategic Energy Framework which includes a target to achieve 40% of electricity consumption from renewable sources by 2020.

- ii. The paper be sent to NIEA for consideration as it forms part of the Countryside Assessment;
- ii. The pressure analysis paper is part of the Countryside Assessment and as such is part of the Sustainability Appraisal and should be used to inform the SEA;
- iii. The pressure analysis should be taken into account when formulating the LDP.

Map 1

Mid Ulster Rural Housing 06/2010 - 05/2014



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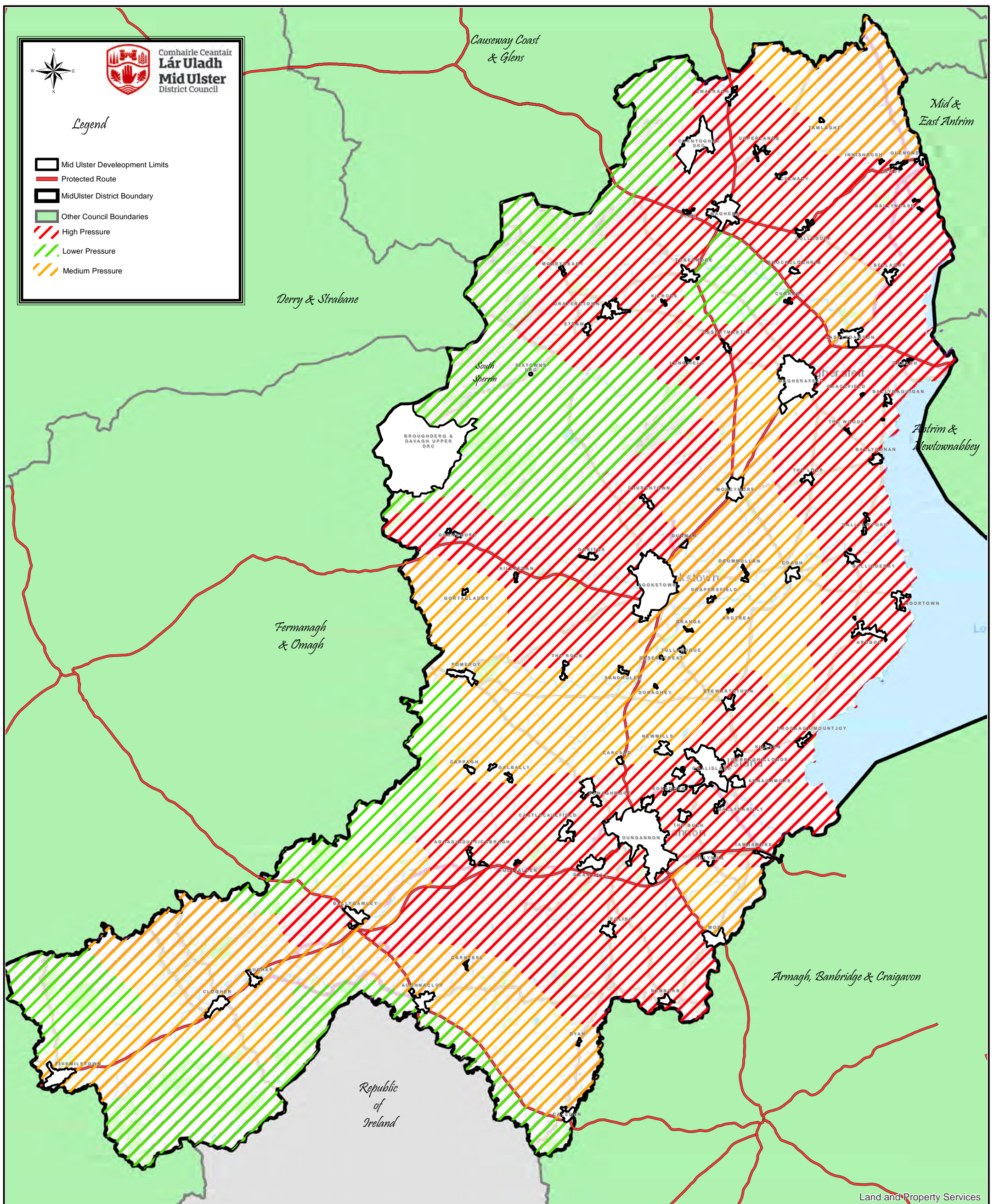
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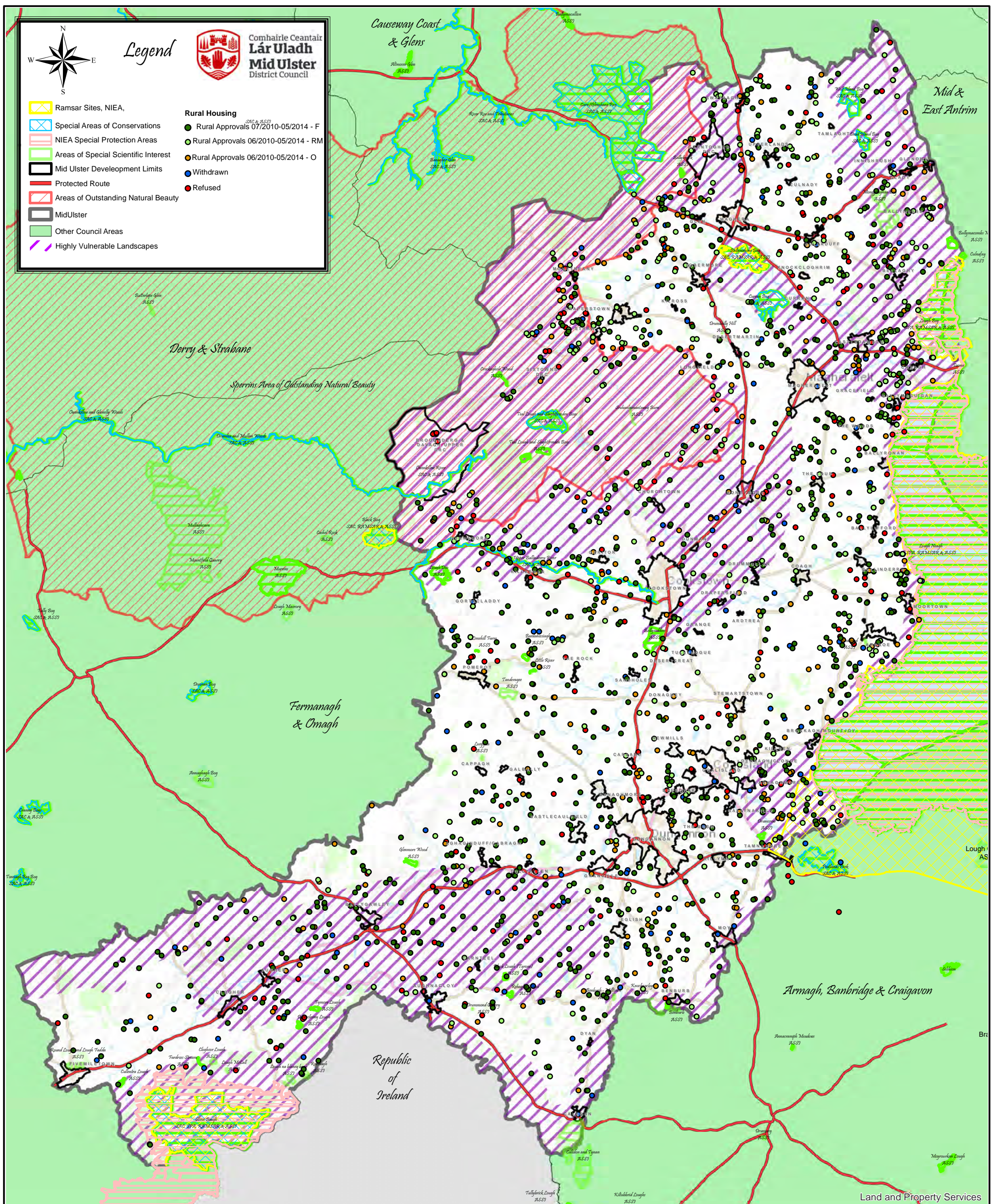
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Mid Ulster Rural Pressure Analysis - Single Dwellings



Map 3 Mid Ulster Rural Single Dwelling Decisions & Vulnerable Landscapes



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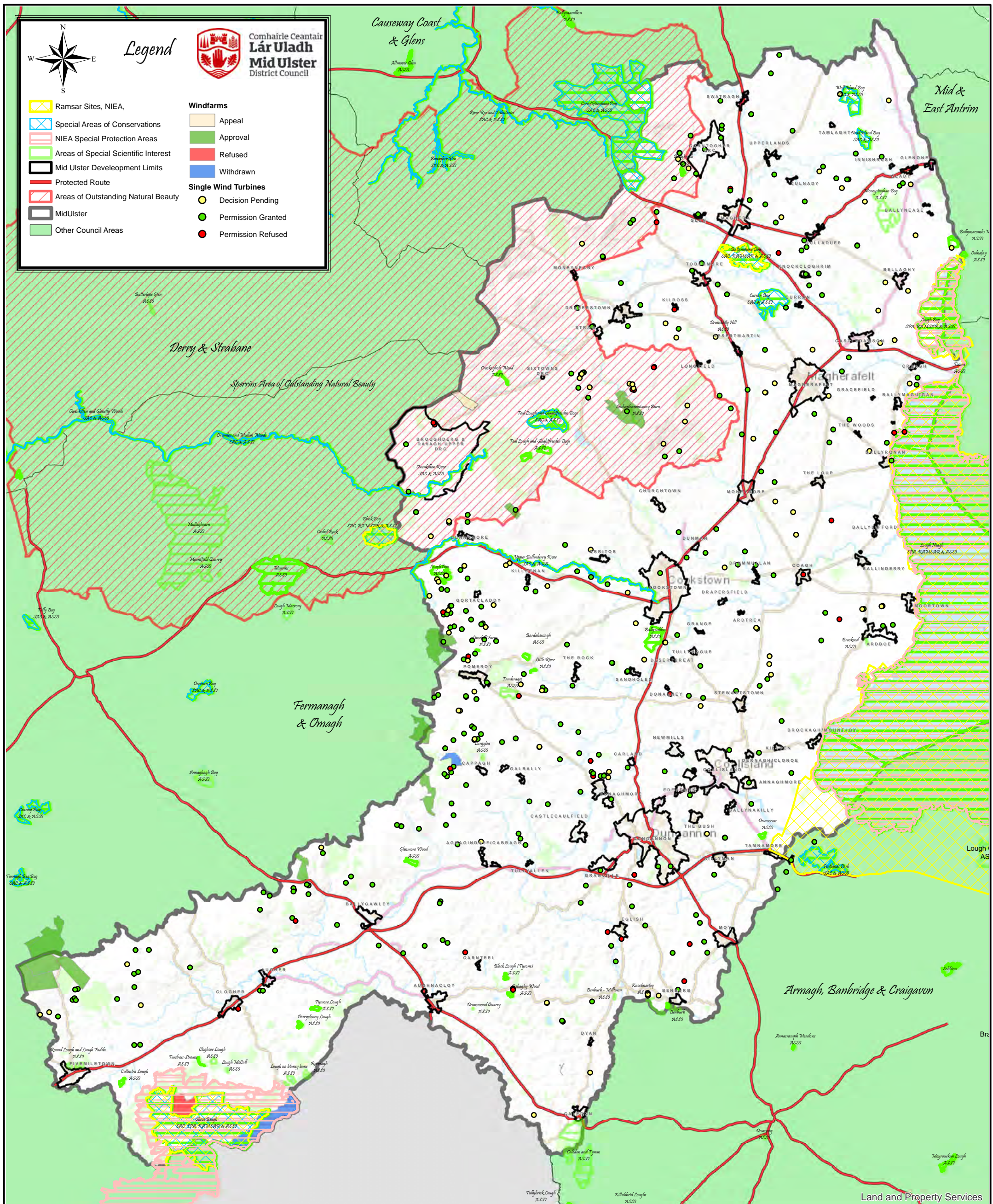
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Map 4

Mid Ulster Wind Energy Decisions 2009 to 2015



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