



Local Development Plan 2030 Draft Plan Strategy

The table below identifies the Draft Plan Strategy Reference Numbers that are referred to in the attached submission, and provides the corresponding Counter Representation Reference Number related to each.

Draft Plan Strategy Representation Reference Number Referred to within attached submission	Counter Representation Reference Number
MUDPS/1	DPSCR/29
MUDPS/2	DPSCR/30
MUDPS/3	DPSCR/31
MUDPS/11	DPSCR/32
MUDPS/15	DPSCR/33
MUDPS/23	DPSCR/34
MUDPS/28	DPSCR/35
MUDPS/42	DPSCR/36
MUDPS/52	DPSCR/37
MUDPS/58	DPSCR/38
MUDPS/69	DPSCR/39
MUDPS/72	DPSCR/40
MUDPS/74	DPSCR/41
MUDPS/82	DPSCR/42
MUDPS/95	DPSCR/43
MUDPS/97	DPSCR/44
MUDPS/98	DPSCR/45
MUDPS/99	DPSCR/46
MUDPS/100	DPSCR/47
MUDPS/101	DPSCR/48
MUDPS/102	DPSCR/49
MUDPS/104	DPSCR/50
MUDPS/105	DPSCR/51
MUDPS/106	DPSCR/52
MUDPS/107	DPSCR/53
MUDPS/109	DPSCR/54
MUDPS/111	DPSCR/55
MUDPS/112	DPSCR/56
MUDPS/113	DPSCR/57
MUDPS/114	DPSCR/58
MUDPS/117	DPSCR/59
MUDPS/119	DPSCR/60
MUDPS/133	DPSCR/61
MUDPS/137	DPSCR/62
MUDPS/138	DPSCR/63

MUDPS/139	DPSCR/64
MUDPS/147	DPSCR/65
MUDPS/154	DPSCR/66
MUDPS/157	DPSCR/67
MUDPS/158	DPSCR/68
MUDPS/171	DPSCR/69
MUDPS/172	DPSCR/70
MUDPS/184	DPSCR/71
MUDPS/185	DPSCR/72
MUDPS/186	DPSCR/73
MUDPS/187	DPSCR/74
MUDPS/188	DPSCR/75

JohnPaul Devlin

From: [REDACTED]
Sent: 08 August 2019 09:23
To: DevelopmentPlan@midulstercouncil.org
Cc: [REDACTED]
Subject: Mid Ulster - LDP - dPS - Counter representations - email 2 of 2
Attachments: Mid Ulster - LDP - dPS - counter representations - HED formal reply 2019....pdf

Dear Sir / Madam,
HISTORIC ENVIRONMENT DIVISION response to draft PLAN STRATEGY REPRESENTATIONS for COUNTER REPRESENTATIONS

In accordance with Regulation 18 of the Planning (Local development Plan) Regulations (NI) 2015 please find attached a copy of our, HED, counter representation. The draft Plan Strategy response to which the attachment replies is noted within the document.

Please confirm receipt.

NOTE: Consent to Public Response

Under planning legislation we consent to the publication of our responses received in relation to the counter representation. However, we ask that the names, contact numbers and e-mail addresses of individuals named are redacted. We are content for the details of the Department/organisation to be published.

Yours Sincerely,

[REDACTED]

[REDACTED] Senior Architect [acting] | Heritage Records & Designation Branch
Historic Environment Division | Department for Communities

Contact:  [REDACTED]  Tel: [REDACTED]  DD: [REDACTED]

REALISING THE VALUE OF OUR HISTORIC ENVIRONMENT

Love Heritage NI - <https://www.facebook.com/LoveHeritageNI/>

European Heritage Open Days - <https://www.facebook.com/ehodni/> / <https://twitter.com/ehodni>

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08 August 2019

Dear Sir / Madam,

RE: Historic Environment Division Counter Representation to representation received to Mid Ulster District Council draft Plan Strategy (dPS)

Historic Environment Division (HED) has reviewed the representations made to Mid Ulster District Council and provide general statement on the following representations:

Prefixed by MUDPS -

1, 2, 3, 11, 15, 23, 28, 42, 52, 58, 69, 72, 74, 82, 95, 97, 98, 99, 100, 101, 102, 104, 105, 106, 107, 109, 111, 112, 113, 114, 117, 119, 133, 137, 138, 139, 147, 154, 157, 158, 171, 172, 184, 185, 186, 187, 188

HED advise our previous comments, on soundness of the historic environment policy approach in the dPS, remain unchanged (see ref: MUDPS-77).

To aid council to remain sound under the **Consistency Test (C3)** and **Coherence and effectiveness test (CE2)** at Local Policies stage of plan making we comment as follows:

The above listed representations have all included location maps indicating parcels of land which the landowners wish to be considered for development lands, residential or otherwise. While we consider the dPS to be the inappropriate stage to include the specific identification of lands, we recognise that this should be through the Local Policies Plan stage of the process.

HED reiterate, that when council are considering specific identification of lands the council zonings are founded on a robust assessment of the historic environment evidence base to inform land zonings for development. Council must be in a position to demonstrate how this

has been taken into account, and how it has been utilised to inform potential forms of mitigation such as appropriate designation or other appropriate key site requirements e.g. for evaluation and identification, of previously unidentified archaeological remains.

In conclusion, Historic Environment Division advise the above comments are toward ensuring that land zoning is carried out in accordance with the requirements of **soundness** under the Consistency Test (C3) and Coherence and Effectiveness Test (CE2). Given the insufficient nature of assessment in relation to the historic environment we consider that the zonings put forward in the above referenced representations are not based on robust evidence and would not meet this soundness test.

Note: We found the format of public release of the representations not end user friendly.

Examples:

- a) It is not possible to filter the 204 representations into topic heading and/or relevant sections from the draft Plan Strategy to which they were responding; and
- b) The pdf published format of the representations could not be digitally word searched.

Both these factors resulted in an extremely time and resource consuming approach where each individual representation had to be opened and read to determine if a counter representation had to be made. Moving forward, it would be a significant benefit to all if future representations in the remaining stages of the LDP process had these functions to enable a topic filtering and word searching functions creating a more fully engaging process.

Yours sincerely,


Senior Architect (acting)


Senior Archaeologist

Heritage Records & Designations Branch

Cc

