



Comhairle Ceantair
Lár Uladh
Mid Ulster
District Council

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/24	DPSCR/7
MUDPS/32	DPSCR/8
MUDPS/33	DPSCR/9
MUDPS/34	DPSCR/10
MUDPS/35	DPSCR/11
MUDPS/36	DPSCR/12
MUDPS/37	DPSCR/13
MUDPS/38	DPSCR/14
MUDPS/39	DPSCR/15
MUDPS/40	DPSCR/16
MUDPS/43	DPSCR/17
MUDPS/44	DPSCR/18
MUDPS/45	DPSCR/19
MUDPS/46	DPSCR/20
MUDPS/47	DPSCR/21
MUDPS/48	DPSCR/22
MUDPS/49	DPSCR/23
MUDPS/50	DPSCR/24
MUDPS/86	DPSCR/25
MUDPS/130	DPSCR/26
MUDPS/132	DPSCR/27
MUDPS/169	DPSCR/28

JohnPaul Devlin

From: [REDACTED] <[REDACTED]>
Sent: 08 August 2019 09:23
To: DevelopmentPlan@midulstercouncil.org
Cc: [REDACTED]
Subject: Mid Ulster - LDP - dPS - Counter representations - email 1 of 2
Attachments: Mid Ulster - LDP - dPS - counter representations with historic maps - HE....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]  [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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Planning Department
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MAGHERAFELT
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Historic Environment Division
Klondyke Building
Cromac Avenue
Gasworks business Park
Malone Lower
BELFAST
BT7 2JA

Phone (direct line): [REDACTED]

email: [REDACTED]

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 -

24, 32, 33, 34, 35, 36, 37, 38, 39, 40, 43, 44, 45, 46, 47, 48, 49, 50, 86, 130, 132, 169

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)** we comment as follows:

HED consider the dPS to be the inappropriate stage to include the specific identification of lands, this should be through the Local Policies Plan stage of the process.

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. Within these representations screen shots of the HED historic map viewer have been provided, stating (or similar) *"no built heritage within site"* or *"no site constraints concerning built heritage but adjacent to historic..."* This is an inappropriate and insufficient assessment of how potential zonings for development are deemed to impact heritage assets and their settings. The datasets utilised from the HED historic map viewer are to identify the heritage asset,

however, simply because the identification point is not within a proposed zoning area does not automatically mean the heritage asset can be neglected in consideration or that site constraints do not need to be considered to protect the heritage asset, e.g. the identification point highlights a specific heritage asset only – monument, building, shipwreck, historic park and so on. The assets themselves and their understanding in the landscape will be much more extensive, e.g. an identification point will not represent an asset measured 60m across, or its associated descriptive survey text, or its full extent that is/was visible, or could be extrapolated from earlier map evidence. This is where and why a robust assessment of the evidence base is necessary. Evidence should include as a minimum more detailed analysis of the wider portfolio of data held by HED when approaching new zonings for development, along with use of historic maps, and landscape character assessment to ensure appropriate recognition of the heritage asset and its setting and how its environment is understood, experienced, seen and enjoyed and so on.

HED reiterate, when council are considering specific identification of lands the council utilise the appropriate and necessary historic environment baseline evidence 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 used in informing potential forms of mitigation such as appropriate designation or other appropriate key site requirements e.g. 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,

[Redacted]

Senior Architect (acting)

[Redacted]

Senior Archaeologist

Heritage Records & Designations Branch

Cc

[Redacted]