



Comhairle Ceantair  
**Lár Uladh**  
**Mid Ulster**  
District Council

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02.12.2020

Dear Sinead,

**Local Development Plan 2030 Draft Plan Strategy – Consultation on Proposed Changes**

Further to your letter dated 1<sup>st</sup> October 2020 regarding the above, I wish to request that our previous correspondence in relation to the schedule of proposed changes - dated 9<sup>th</sup> September 2020 is withdrawn. Mid Ulster District Council have considered the updated Schedule of Proposed Changes, which has been published by Fermanagh and Omagh District Council and would like to make the following comments, which have been laid in the table below for ease of reference.

For expediency, we have not commented upon minor or grammatical changes but we feel there are certain aspects of some of the other changes which are worthy of comment, particularly where the issues involved are issues common to both our jurisdictions and which are issues where a joined up and common approach is considered to be important.

In addition to the comments included in the table below, we note the general trend across the schedule of proposed changes, which removes certain pieces of text either from policy wording or from policy clarification because it is already included in other parts of the draft Plan Strategy. For example, proposed change no. 27 removes the entire policy HOU 8 because it is “adequately covered by other policies in the Plan Strategy”. This general trend of streamlining policy is something, which we welcome, in the interests of removing duplication within the draft Strategy and making it a more condensed and user-friendly document.

The table below sets out the main comments that MUDC would make in relation to the Schedule of Proposed Changes.



FODC PROPOSED CHANGE REFERENCE	DETAIL OF PROPOSED CHANGE	MUDC COMMENT
21 - Policy HOU01	<p>Inclusion of wording to state that housing on unzoned greenfield land within a village or small settlement will only be permitted where the need cannot be met on zoned land or housing policy areas;</p> <p><i>“The Council will only permit housing on unzoned greenfield land within the settlement limits of a village or small settlement where either;</i></p> <p style="padding-left: 40px;"><i>(i) The future housing need exceeds the number of existing commitments and there is no evidence of this housing need being met on sites within any Housing Policy Areas”</i></p>	<p>MUDC note the inclusion of this policy wording. We advise that in Mid Ulster we have not adopted such an approach. The reason for this is our settlement limits tend to be tighter as a whole and as a consequence we do not feel development on unzoned land will lead to detrimental excessive housing supply in settlements in Mid Ulster.</p>
31 Policy HOU14	<p>Alteration of policy wording to state that rounding off / infilling opportunities must be linked with a group of buildings constituting a minimum of 4 buildings, instead of 3 as contained in the original policy.</p>	<p>MUDC welcome this alteration, as it will bring the policy into line with that of Mid Ulster, which states that the cluster must provide a group of <i>“4 or more substantial buildings.”</i></p>
32 Policy HOU17	<p>Increase the amount of affordable housing deemed acceptable in the countryside, at or near a village or small settlement.</p>	<p>NIHE will identify a need in a particular area and if this need exceeds 8 houses then this policy will not be capable of meeting the identified need. The corresponding MUDC policy does not place a cap on number of units, rather it leaves it open so that the policy is <i>“capable of meeting the needs of the rural community as identified by NIHE.”</i></p>

FODC PROPOSED CHANGE REFERENCE	DETAIL OF PROPOSED CHANGE	MUDC COMMENT
MIN04 – No proposed changes	No proposed changes.	<p>While no changes are now proposed to policy MIN 04 we consider that a more robust policy wording such as formerly suggested and noted below would accord with policy MIN 3 of MUDC's Draft Plan Strategy;</p> <p><i>"The Council will not permit the exploitation of unconventional hydrocarbon extraction until <u>there is sufficient and robust evidence on all associated impacts on the environment and human health.</u>"</i></p>

Please feel free to contact me should you wish to discuss any of the comments outlined above.

Thank you for the opportunity to comment on the Schedule of Proposed Changes for the draft Plan Strategy.

Kind Regards



Chris Boomer  
Planning Manger