



Regional Planning and Transport Division
Room 3-01, Clarence Court
10-18 Adelaide Street
Belfast BT2 8GB

26th September 2006

Dear Sir/Madam

RE: Five Year Review of the Regional Development Strategy 2025

Please see attached Dungannon & South Tyrone Borough Council's response to the Five Year Review of the RDS.

The Council is also a partner in a joint response on behalf of the Western regional Councils (Magherafelt, Cookstown, Dungannon, Omagh, Fermanagh, Strabane).

The main concerns of Council are: the level of public investment west of the Bann in Northern Ireland, particularly to Dungannon as a growth hub, given the commitment within the document to regional dispersal of growth; the proposed changes to Chapter 8 Rural Northern Ireland with particular reference to future economic development; the continuous reference to PPS14 which the Council has previously submitted concerns; and the future housing supply particularly in growth areas.

The Council would like to seek a meeting with the relevant personnel to provide support on the delivery of the RDS in its commitment to dispersed regional development.

Please contact myself or Claire Linney, Corporate Strategy and Policy Officer if you have any queries relating to Council's submission.

Yours faithfully

John Campbell
Chief Executive

Five Year Review of the Regional Development Strategy 2025 (RDS)

Dungannon & South Tyrone Borough Council as civic leaders for the Borough have concerns regarding the five year review of the Regional Development Strategy.

The main concern is to the proposed changes to the strategic planning guidelines and their supporting measures for rural Northern Ireland and the environment. The inclusion of such amendments is questionable in light of the controversy and concern that has been expressed of PPS14 'Sustainable Development in the Countryside'.

The RDS clearly states that 'In building consensus for a balanced approach to accommodating growth over the next 25 years, equality and equity should be to the forefront of the long term development of the Region. The spatial elements of the RDS seek to achieve balances between urban and rural communities and the east and west of the Region to provide equality of opportunity for all'. Dungannon & South Tyrone Borough Council would seek clarification as to the level of success that Government has had in achieving this overall objective.

The RDS also seeks to encourage decentralised development at identified growth poles, focused on the North West and the main towns throughout NI. Investment in Derry City as the city west of the Bann is welcomed; however it does not suffice in terms of dispersal of investment across Northern Ireland, as approx. over 1mn people reside outside of the two main urban centres.

Dungannon is a hub town located west of the Bann and is part of the Strategic Transport Network for Northern Ireland and gateway to the Republic of Ireland. Given its status within the RDS as a hub town in Northern Ireland it is important that is promoted and supported as a growth centre. The Council is keen to support the development of this and in meeting the objectives of the RDS.

Regional Development

At present the Council is concerned as to the level of public investment west of the Bann in Northern Ireland, particularly in Dungannon, as a growth area. Dungannon Borough is one of the fastest growing areas of Northern Ireland. In the recently publicised report by NISRA for 2005 the Dungannon area saw the largest population increase of 2.9%, which is almost four times the 0.8% average. Proportionally the Borough is the area most benefiting from inward migration with an estimated several thousand migrant workers.

The Council is concerned as to recent and current proposed closures of government administration offices in Dungannon town with no clear business cases. The area experienced the closure of Dungannon & South Tyrone hospital which has left a large part of rural Northern Ireland, west of the Bann over one hour away from a hospital and emergency services. Current proposals are in process to relocate the Water Service office in Dungannon to Armagh and the Probation Board Office to Omagh.

Dungannon town has been named as a hub town within the Regional Development Strategy and is classified as a medium town. It has retail centre status; it is recognised as a health and education centre, an employment centre, a service centre, and a public administration centre. In terms of its potential as a public administration centre it has been identified that Dungannon currently has a capacity for further development, and currently lacks behind other neighbouring areas with similar populations.

Dungannon & South Tyrone Borough Council welcomes the recent commitment by Ministers to address decentralisation of government services as part of the RPA across Northern Ireland and in rural towns, including those that have been impacted by closures. The Council believes that Dungannon provides for a strategic investment location for public administration and would be keen to work in partnership with government departments to address and take advantage of its vast potential and to support the RDS.

Rural Northern Ireland (Chapter 8)

Dungannon & South Tyrone Borough Council has serious concerns relating to the proposed changes in Chapter 8.

The Council accepts that there has been a variance in growth rates in the open countryside compared to that of towns and villages over the last few years. It would like the Department to take account of a number of situations that may have impacted upon this, such as, the instigation of PPS14 and land banking, availability of land in terms of phased areas not being released to the market, and poor quality planning.

The Council agrees that a hierarchy of development in rural areas 'outside the BMA and Londonderry', is important: main town – town – village - open countryside. However PPS14, in its current form, is not the appropriate solution as it will have a serious impact on rural life in the countryside, which will have knock on affects to other settlements. It is not recommending countryside development at the expense of weakening towns and villages, but a balanced approach that retains a hierarchy of growth whilst complementing community living in the countryside, Refer to Council's response to PPS14.

The Council has concerns with regard to the Departments proposals to amend the strategic planning guidelines in **RNI 1.2** of the document, causes concern for the future of open countryside in rural areas.

The Department recommendation is to amend RNI 1.2 so that bullet points 1, 2,3,7,8 would relate to settlements and 4, 5, 6 to the open countryside, reference Appendix 1. The development proposed for the open countryside would: **'Support environmentally sensitive proposals, of an appropriate scale and nature, for the creation of new enterprises in farm building complexes no longer required for agriculture'**. And **'The use of minerals for economic development in a sustainable manner and in a way which assesses the need to exploit the mineral resource against the need to protect and conserve environmental resources'**. This would in effect result in no economic development in the countryside unless it relates to obsolete farm buildings.

The Council would have serious concerns as to these proposed changes and would suggest that the strategic planning guidelines remain without change. The current guidelines should be supported by good quality implementation of to suit the needs and character of local areas. Dungannon has developed entrepreneurially across the Borough. Economic development and SME development have taken place in the open countryside which has provided much needed employment for rural communities. This development to date has taken place based on the needs of rural areas and in keeping with the development of communities and the environment. Good quality planning implementation should provide for economic development whilst being sensitive to the environment, without the need for a moratorium on any future development in the countryside and resulting economic decline.

As Council stated previously in its response to PPS14 and as stated within the RDS, the main concerns about the cumulative impact of development in parts of the countryside particularly relate to the east of the Region and close to towns where the pressures are high. Therefore a 'one solution fits all' is not acceptable and east and west of the region must be addressed differently.

In terms of the Department's proposal to rename section RNI 2.1 from **'A vibrant, living and working countryside'** to **'A vibrant, living and working rural community'**. To allow the associated points contained within this section to relate to villages and larger settlements whilst not diluting their impact on the countryside, the Council would propose that the new title would read **'A vibrant, living and working rural community and countryside'**.

The Council does not see the need to reconsider, as stated in the document, the need for SPG RNI5 'To continue to create and sustain an attractive and unique rural environment in the interests of the rural community and the Region as a whole'. PPS14, to presume against all development in the countryside, is not a feasible solution to ensure a sustainable environment. There continues to be a need for the RDS, to retain a commitment to a sustainable environment, without relying on PPS14 in its current format.

Housing (Chapter 9)

Dungannon & South Tyrone Borough Council would stress the need for a rural housing capacity study similar to that of urban studies for districts across NI. In terms of the recommendation for uplifted housing figures for the Region and for districts, it is important that this takes place in consultation with local Councils. It is also critical that the new figures are set specifically at district level to take account of growth areas such as Dungannon. As stated previously Dungannon Borough is one of the fastest growing areas, NISRA 2005.

Complementary to the need for uplift in housing figures for districts of Northern Ireland it is also important that a review is undertaken of the phased land approach and areas of land lock. Dungannon is experiencing housing demand issues due to the lack of release zoned land. This must be taken into account when reviews of house phasing are being undertaken.

In terms of the three proposed options for housing growth indicators to feed into the Area Plan process:

1. Strategic Direction of Growth – i.e. Development plans to identify policies which indicate strategic direction for future growth but do not identify actual sites.
2. Strategic land Reserve – i.e. A strategic reserve of land which would be identified but not allocated within the development Plan but which could be brought forward under certain circumstances.
3. Reserve Phasing – i.e. land would be included in the development plan, beyond the need identified in the current Housing Growth Indicators, as a later phase (a reserve phase) which could be brought forward without the need for an alteration should the need arise to the plan.

The Council would propose that Option 3 be used, given its experience to date of land lock and accelerated land prices.

The 60% Brownfield status will remain for settlements over 5000.

In relation to the reference to the need for a balance of housing between the main hubs and open countryside, the Council believes this should be decided in negotiation with local Councils and needs of a particular district, and should be allocated at district level and not an overall Northern Ireland figure.

As stated in Dungannon & South Tyrone Borough Council's response to DRD on the PPS14, it is not in favour of the existing policy presumption against development in the open countryside. The Council recognises that single housing in the countryside cannot go unchecked however it would propose a number of recommendations to ensure a quality approach to planning in the countryside balanced alongside villages and towns, see attached copy of response.

Economic Development (Chapter 10)

As stated previously the Council would like to reinforce the position of Dungannon as a main hub location, as identified within the RDS. The main hub centres identified for dispersed regional development and growth need to be supported as such, through government investment in such areas as roads infrastructure, skills development, innovation, tourism etc.

Regional investment needs to be complemented by the principles of equity and equality of investment. The role of Councils in the development of hub centres, identified within the RDS, should be expanded, to allow for identifying investment priorities for government spend.

Dungannon & South Tyrone Borough Council would like to stress the need for greater dispersal of innovation, R&D and skills development particularly in technology and science. The concentration of such development is presently in the east of the region; NI Science Park and the University of Ulster at Jordanstown. To allow for innovation to develop across the region which is the key to the future of economic development it must be dispersed to other areas of NI, through location. The Council is currently researching the potential for such development in Dungannon town given its high entrepreneurial background in engineering and technology, academic and skills acumen, and developing scientific and ICT sector.

The document highlights the five Tourism Signature Projects as key to the development of tourism across the region (Derry City Walls, Christian Heritage St Patrick's Down, Giants Causeway, and Titanic Belfast). It is important that Government continues to address the development of small and medium sized tourism projects in other hub towns and areas across Northern Ireland, to ensure the retention and celebration of culture and heritage and the extended visitor experience. Given the focus of government spend on the five main signature projects It also remains important that private sector opportunities are promoted as important e.g. in Sectoral tourism such as golf, fishing and other areas maximising on their natural and other resources.

Transport (Chapter 11)

The Council would propose that under the RDS that development of an upgraded strategic transport route would be addressed to link the main hubs of Coleraine – Cookstown – Dungannon – Armagh – Newry. At present they are linked by a link corridor however this should be addressed as a strategic transport corridor, given the absence of a rail corridor along this route.

Please refer to Dungannon & South Tyrone Borough Council comments on the proposed Sub Regional Transportation Plan 2015.

Caring for the Environment (Chapter 12)

In reference to the inclusion of PPS14, please see Council's earlier comments and attached response to this policy statement. Please also refer to Council's response to the section on Rural Development and the need for balanced sustainable development economic, social and environmental.

Implementation of the RDS (Chapter 13)

It is critical that the RDS as the overriding strategy document for Northern Ireland is used to bring government departments and strategies together. It is evident that this is being partly achieved however there still remain areas that this is not happening, for example planning versus waste management.

It is also important that greater controls and evaluation systems are put in place to monitor the RDS, for example in terms of the level of dispersal of development across the region, as at present this level of detail is not provided in the review.

It is important given the future role of Councils that they have a clear involvement in the strategic decisions taken under the RDS, given the complementary impact at the sub regional level.

Rural proofing

It is important that rural proofing is mainstreamed throughout all government policy and practice, with DARD as a rural champion. The Council has concerns that at present rural proofing is seen as an add-on, a process, and not taken as good practice in policy and delivery.

Appendix 1

RNI 1.2 Facilitate the development of rural industries, businesses and enterprises in appropriate locations, and ensure they are satisfactorily integrated with the settlement or rural landscape:

1. Foster indigenous rural businesses that build on the local resources of land and people and ensure maximum local added value;
2. Foster rural community projects and facilitate the diversification of the rural economy, generating jobs near local people;
3. Facilitate the development of opportunities for growth in employment, niche markets, inward investment, micro businesses, and extending the rural services industry;
4. **Support environmentally sensitive proposals, of an appropriate scale and nature, for the creation of new enterprises in farm building complexes no longer required for agriculture. Also to facilitate the provision of business premises in small towns and villages;**
5. Encourage the use of information technology, telecommunications and tele-working in rural areas;
6. **Use minerals for economic development in a sustainable manner and in a way which assesses the need to exploit the mineral resource against the need to protect and conserve environmental resources;**
7. Maintain and improve rural infrastructure to facilitate economic development; and
8. Build the capacity of the rural community to develop and avail itself of new economic opportunities by facilitating development for appropriate high quality training in skills for the future.

Appendix 2

A vibrant, living and working countryside

A strong community focus based around a well-developed sense of identity with a town or locality, and the land, is a long-established feature of rural life and society. The Strategy seeks to reflect and develop this strong sense of place and community focus as an important feature of Rural Northern Ireland. Community division in Rural Northern Ireland, as in the region as a whole, has had an impact on economic and social activity. Parts of Rural Northern Ireland also suffer as a result of deprivation and social exclusion. In line with the guiding principle to promote spatial equity and the New TSN initiative, the aim is to promote a comprehensive, balanced and integrated approach to dealing with these problems ensuring a continuing robust rural community, with opportunities for all.

SPG-RNI 2: To create and sustain a living countryside with a high quality of life for all its residents

RNI 2.1 Help maintain a vibrant and self-generating rural community:

1. Accommodate new housing development to meet local housing need;
2. Encourage the development of balanced rural communities by promoting housing choice and affordable housing in rural areas (C9: SPG-HOU 6);
3. Promote the use of the Local Development Guidelines (C12:SPG-ENV 4);
And
4. Support the continued development of long established rural communities:
 - Recognise the strong sense of belonging and sense of place in rural areas;
 - Encourage sensitive and innovative rural development schemes, both within villages and small rural settlements, to
 - Enhance established patterns of local community activity and reinforce strong community identities;
 - Help rural communities to develop strategies for economic and social regeneration in the face of wider rural change, with a particular focus on the sustainable and equitable development of disadvantaged rural areas;
 - Continue to develop a partnership approach to tackling complex rural issues based on community participation.

Dungannon & South Tyrone Borough Council Response To PPS14

1. Inaccurate Statistics

The Council has real concerns over the statistics used by the Department to inform the policy which show to be inaccurate.

The minister quotes a figure of 9,520 approvals for new rural dwellings in 2004/05. The Commercial Information Company (CIC) (a specialist provider of Planning information supplied by the Planning Service) records a figure of 8,216 Full and Outline approvals.

The Minister also states that the figure for 2005/2006 will be well over 12,000, but the CIC figures show 6,983 Full and Outline approvals to 10/3/06. This is a FALL of at least several hundred and certainly nowhere near the 12,000 quoted. Statements previously on the DRD website, www.drdni.gov.uk (consultation zone) also inflated figures. "In the last 10 years over 86,000 new dwellings were approved, equivalent to building 2.5 Derry Cities in the countryside." This is inaccurate. The CIC figures show 59,000 Full and Outline approvals rather than 86000.

Whilst it is recognised that there has been an increase in the numbers of planning applications for dwellings in the countryside, this can be partly contributed to the leak of this forthcoming policy.

2. Equality

There is no provision in the plan for people with disabilities or the elderly. Given the statistics for a growing aged population in the future this will have serious implications. There is an added problem for the elderly in rural areas in terms of family care support that will not be available if there is a presumption against planning. Traditionally families have provided the required support to the elderly in rural communities, alleviating pressure on government in terms of care. Families want to continue to provide this support and require flexibility in planning to do so.

The plan will also have a real impact on young people in terms of affordability. If house prices continue to rise, given the demand and supply un-equilibrium created by this Policy, this will have a greater impact on young people who plan to get onto the property ladder. Therefore first time buyer, generally the young, will be disadvantaged in terms of access to a home.

A large percentage of the rural area and countryside is West of the Bann; therefore this policy will have greater negative implications for people living in

this area. In terms of section 75 groupings the policy will therefore have a greater impact on the Catholic community, which has a higher representation in the West of the region.

Proposal

It is important that the policy is adequately equality proved in terms of its impact on sections of the community in terms of Section 75.

3. Sustainable Development

CTY1 identified as the most important section within the document as the overriding principle for the remainder of the policy is seriously flawed in terms of its analysis.

Sustainable development in the countryside should not mean a presumption against planning, as this would undermine the planning system in NI and planners in terms of their ability and expertise to implement sustainable development policy.

The draft policy document focuses on sustainable development through the environment but gives no consideration for the other two pillars of sustainability that being social and economic development. Whilst it is accepted that environmental development is important, consideration must be given to rural areas as places to live and not countryside parks for urbanites. The proposed PPS14 should simultaneously provide for its most valuable asset, its people, without whom there is no so-called "sustainability".

Whilst it is accepted that unchecked development in the countryside is neither desirable nor sustainable, Dungannon & South Tyrone Borough Council would strongly oppose a Policy that fails to acknowledge a diverse economy beyond the environment and most importantly the strong sense of belonging and attachment to place felt by those living in rural communities including but not exclusively those involved with agriculture.

The principle of sustainability is to be supported along with green belts, areas of outstanding natural beauty and other designated/protected areas, but the proposed PPS14, with an almost blanket ban on new housing in the countryside, will in many ways prove counterproductive in achieving this end and will have massive implications for rural schools, post offices, etc and the sustainability of rural communities.

Rural communities have and continue to be actively involved in sustainable development, which is evident from the level of self- development in rural areas (a large element of which has been provided without government support). There is a strong community support infrastructure across rural NI, community sport and Church organisations who play an active role in youth interaction and development, and embedded social structures which have been instrumental in alleviating social problems visible elsewhere and predominant in urban areas.

This Policy PPS14 is questionable in terms of its statement that the provision of housing will be supplied through towns and villages. There is real concern as to the viability of this option and the potential for a major housing demand/supply crisis, forcing the price of housing upwards to an unrealistic level for the economy. Experience from the areas in the ROI and Scotland has shown that urban focused planning and development has led to real problems in terms of rural decline and increased social, transport and sprawl problems in urban areas. Given this experience, these areas have now reversed their policies in favour of planning in the countryside.

Dungannon & South Tyrone Borough Council has grave concerns that the Department for Regional Development is being led by a small number of people within environmental lobby groups. It is important to note that rural people have and continue to be responsible and sensitive to the needs of the environment. In rural Northern Ireland they have and continue to look after the countryside as custodians of the land and do not favour unchecked or inconsistent development.

It is also important to consider that Northern Ireland is not a homogenous region in terms of a single planning solution. East and West are not comparable. This is evident given that a large percentage of unsustainable planning complaints have been towards areas in the East of the region as a result of overspill from the Belfast Metropolitan Region, whilst areas in the West of Northern Ireland are only beginning to repopulate after years of decline. Sustainable Planning policies should be tailored to suit areas.

Historically development, and industry and commerce have been directed East of the region, a planning policy needs to address and allow for dispersal and development across all of NI as a region, as stated in 'Shaping our Future'.

Proposal

To ensure this policy addresses the real definition of sustainable development and integration and balance of the economic and social strands. Any real vision of sustainable development in the countryside must take account of rural people and the fabric and identity of rural communities.

To ensure a future planning policy statement for sustainable development in the countryside takes account of Northern Ireland as a diverse region, particularly in terms of the East/West split and future regional development.

4. Agriculture

Whilst the document does make some provision for agricultural development and for farm families, it does have limitations for farmers who have previously sold land as a disposable asset or who do not have a viable farm to support employment. This is unrealistic and does not take account of the changing agricultural industry, in terms of part time farming, and family support from sons and daughters where the luxury of a full time agricultural wage is not

available. It must be recognized that farming in Northern Ireland is very different from that of England, which it would seem this plan is based upon (reference PPS7). Northern Ireland farming is tenant based which relies on the support of its family and surrounding community (voluntarily) for operation.

Many farmers and farm families trying to diversify and avail of off farm work to maintain the family farm will be negatively impacted by this policy. The criteria set out for farm families is unclear and the use of the term 'Hobby farm' is inappropriate, especially given the family time commitment to agriculture and to being custodians of the land.

It must also be recognized that there has been real challenges to the agricultural industry over the last ten years contributed by EU regulation, BSE, Foot and Mouth etc. In the changing face of agriculture where the farm holding can be the only disposable asset to help defray growing costs or debts, farmers have had to resort to selling sites. PPS14 now restricted a farmer's son or daughter, engaged in farming, to get planning permission where a site has already been sold off from the farm holding.

Proposal

To address the policy in terms of its implications on farm holdings for those who have sold a site previously, particularly in light of the agricultural industry over the last 10 years.

To take account of the changing agricultural industry in Northern Ireland and to provide flexibility for all farming not only those of large employment farms, and as part of this to take into consideration the vast support role of farm families.

To use ICAS as a criteria for farmers and farm families to avail of opportunities for development in the countryside.

5. Non-Agriculture Rural Communities

Contrary to what the new policy document states rural areas are made up of a more diverse range of people than just farmers. Whilst fewer families in rural areas now identify with agriculture, they do still identify with their local community and family tradition. The overwhelming majority of country people have not been catered for in this document. They will be among the many who will be forced to leave their family lands and, in many instances, the whole rural support network, be it family, educational, cultural or sporting that goes with it.

A large percentage of the unsustainable development to date has resulted from new people moving into areas who have added little to community life, services, the economy and local identity; and on many occasions have only been interested in capital gain. Rural communities have for years both farming and non farming taken great pride and responsibility for looking after

rural areas, and want to continue to do so in partnership with good planning practice.

Given Northern Ireland's unique situation as a divided society, identity and community have played a vital community support role, and continues to do so as people move forward under 'A Shared Future'. Peter Hain stated recently 'We want to encourage partnerships between communities and engender a sense of pride in space shared with neighbours, so that peace lines are gradually transformed to a dynamic, welcoming and safer environment' (speech for ICTU Newry 25th April 2006). This planning document does not give this issue consideration and will result in the opposite of what is being proposed, as it will lead to a breakdown in communities.

Proposal

There needs to be provision within the document to address kinship and community identity in housing in the countryside. Similar policies have been introduced elsewhere. In the ROI a kinship criteria for ensuring that rural people have an opportunity to remain in their areas has been introduced, and in Scotland rural people have been proactively supported to live in rural areas through the use of agricultural and forestry land. Both of these examples have contributed to the sustainable development of rural life. In supporting the implementation of a kinship policy it would be important to ensure an occupancy criterion of a minimum number of years (five years) thus avoiding speculation.

6. Social Mix and Affordability

PPS14 will impact most severely upon people from rural communities on lower incomes wanting to live near their families.

The impact of this policy on the supply and demand equation will have a direct impact on house prices in rural and urban areas. At present first time buyers are finding it difficult to secure a home, even with an increase in mortgage lifetimes to 30 years, and this situation will get worse. This plan will create a situation similar to that in England where housing supply is so low compared to demand that such practices as mortgages being left to the next generation will occur, and this will be for the fortunate people.

The document is also void of any proactive policy to address affordability and social integration. The document refers to creating small clusters of social housing in rural areas where needed. Apart from not wanting to return to a policy of social housing development of the 1970's of isolated estates, it is also not viable.

It is evident from recent Northern Ireland Housing Executive policy and social housing associations that isolated social housing is no longer a viable option. Social housing can only be provided through integration, to allow for a release of private housing to support economic viability. A further viability argument will ensue in terms of inaccessible sites due to inflationary prices.

It is important that affordable/social housing is included in the PPS14 policy. This needs to be based on social and environmental integration and good quality, and not developer led. It also needs to ensure that kinship is addressed to sustain rural communities and avoid short-term gain.

Complementary to this is the need for government departments to use its' planning powers in the provision of integrated affordable/ social housing in private developer schemes. Successful models of affordability and social housing mix have been implemented across the UK and in particular Cardiff and Glasgow. This links to the avoidance of planning powers to ensure developers' meet their responsibility in housing development. Too often other government departments and the ratepayers have to pick up bills to supplement private profit gain. A common example of this is the provision of play in housing development, however there are more serious implications such as sewage and service needs. Phase II zoned development land should include integrated social/affordable housing.

Proposal

It is important that a future planning policy would proactively address integrated social and affordable housing in rural Northern Ireland. To avoid speculation, it is important, as mentioned previously, to implement tenure agreements.

To proactively use planning powers to ensure developer responsibility.

7. Waste Disposal

Sewage is another issue cited as unsustainable development and an environmental concern. Issues around proper control of sewage effluent from dwellings does not require a major overhaul of planning policy, merely a change in its implementation.

The onus should be on the applicant to provide satisfactory septic tank arrangements, and given our new technology this should relate to new environmentally eco friendly solutions, examples of which can be found in Donegal.

Building Control in local authorities could also support Planning in terms of ensuring effective systems and infrastructure are in place before development can proceed.

Given that the sewage system has been held up as a major concern it would question the role of Water Service and EHS over the last number of years. The waste crisis requires attention through investment, as there has been little to no infrastructure development in this area over the last number of years. New up to date sewage facilities are required on main roads across rural Northern Ireland. A similar situation will be warranted in settlement areas that are currently under strain.

Proposal

To include within the document a commitment to upgrade the NI sewage system along key roads in NI and to look at new innovative septic tank systems which should be the responsibility of the homeowner to provide.

8. Replacement Buildings

There is the opportunity in PPS14 for greater emphasis to be placed on the restoration and re-use of derelict and vacant traditional buildings, or what is commonly known as Brownfield sites. It is important that greater flexibility is provided in this policy area to allow buildings that have been abandoned for a short and longer- term period to be included, along with previous residential use and other non-residential buildings e.g. barn conversions. It is important that replacement buildings are maximized in terms of their contribution towards the supply of housing and ensuring environmental sustainability.

It is also important that the natural setting of Brownfield sites is retained, particularly site integration. Clear guidelines need to be set for Brownfield site development in terms of natural setting and integration, and enforcement used for abuse, which Councils could support and endorse.

Proposal

It is important that a future planning policy maximizes the use of Brownfield sites (derelict sites and replacement buildings) in the countryside, and that clear guidelines and enforcement are in place to ensure that natural setting and site integration are preserved.

9. Integration of housing design with the environment

Integration of housing with the environment is of major importance. This has been a key principle in the past in planning, however it has not been given adequate attention or enforcement. It should be the responsibility of the person building the house in liaison with planning to show that the proposed dwelling is discretely screened from public view, safeguarding the integrity of the countryside.

Agreeing the building of appropriate size and shaped buildings for rural Northern Ireland is key, vernacular style does not provide for control of building size, which has been a major issue in poor planning. The document does not provide for specific guidance on this or the commitment to enforcement. The department's guidelines also fail to recognise the historical regional variation of design and that rural areas in NI often differ on a geographical basis.

Guidance in Northern Ireland should not equate with other parts of the UK, all of which are very different in terms of environment, economics and most importantly community and the need for local identity.

It is important that community planning is used as an effective tool to engage local people and provide ownership of future sustainable rural planning, including good design and integration.

An issue that has not been highlighted in the policy, which has been a contributor to unsustainable development and poor integration, is the lack of an effective neighbourhood notification scheme. At present the scheme relies on the good-will of the applicant to provide the necessary details of neighbours and it only relates to the immediate neighbour. It also provides no guidance to design or integration. Other areas have implemented innovative systems, such as the ROI, who stipulate that public notices with detail of the proposed plan must be displayed on the intended site.

Proposal

It is important to ensure clear site integration and design guidelines are part of a future policy and that this includes a commitment to enforcement.

To support sustainable development and good site integration and design it would be valuable to incorporate community planning and to implement a good neighbourhood notification scheme.

10. Joined up Government

It is important that the future Planning Policy PPS14 for Sustainable Development in the Countryside is developed through integration with other departments and policies. Given the blanket approach of the policy and its implications on the future development of rural communities it would seem that it would contravene the work of other policies such as the new Rural Development Policy and Strategy 2007 -2013 and A Shared Future.

There is a real issue in terms of rural proofing of all policies. This policy has either not been rural proofed or inadequately. The PPS14 policy in its current form will have drastic negative consequences for the future sustainability of rural areas in terms of all three strands social, economic and environmental.

It is important that joined up government takes place at all levels. For example at operational level Building Control should be able to support the Planners in ensuring sustainable development. However it is difficult to do this if minor processes, such as providing evidence of planning permission and site details in advance of a building inspection, are not in place.

Proposal

To ensure PPS14 policy complements other government policy and strategy.

To ensure any final PPS14 document is rural proofed, as this current document would fail in terms of its impact on rural areas.

To ensure partnership across government to allow for joined up working at operational level.

11. Governance

Councils would seek to work in partnership with DRD on the future development of a planning policy for sustainable development in the countryside, particularly in light of its future role specified in the RPA.

It is important that community planning, as committed to by Government in the RPA, has a key role in future planning in rural areas. Community planning models are being trialed at present and it would be useful to analyse these and look towards implementation of good practice.

The planning process timescale has and continues to be an issue. It is important that future planning becomes more effective and efficient, without losing quality in terms of ensuring sustainable development and good planning.

Dungannon & South Tyrone Borough Council

Comments on the proposed Sub Regional Transportation Plan 2015

1. Highway Measures

1.1 Dungannon & South Tyrone Borough Council welcomes the commitment from the Department to introduce traffic management measures, measures to reduce bottleneck at key junctions and measures to direct traffic away from where there are high pedestrian flows in general towns and cities. However it does have a number of specific comments, see attached comments relating to the technical supplement for Dungannon as prepared by the Dungannon Regeneration Partnership.

1.2 In terms of new roads to provide access to new development areas and new roads to provide congestion relief to the town centre or other environmentally sensitive areas. The Council would seek further clarification as to proposals for a small town as Coalisland, which is experiencing major congestion problems throughout the day. It would also seek information on what is being proposed for villages and rural areas in the Borough.

1.3 The Council would seek clarification as to the proposed highway measures, routine maintenance, bridge strengthening schemes and street lighting capital programmes and associated finance provision for Dungannon & South Tyrone Borough.

2. Bus Provision

2.1 In terms of rural bus provision the Council welcomes the commitment from the Department to new service provision in towns with a population of 10,000 or more. However it would question why the proposed operating period across Northern Ireland favours areas in the BMA region, given that Dungannon is recognized as a main hub.

2.2 It would provide for greater strategic linkage if the key hubs of Coleraine – Cookstown – Dungannon – Armagh - Newry were linked as a key transport corridor, similar to that of other main hubs and given the absence of a rail corridor along this route.

2.3 Dungannon and South Tyrone Borough Council welcomes the Plans proposal to refurbish the town bus station and implement a programme for people with disabilities. Given the strategic importance of the SRTTP Council

assumes that what is proposed in this plan is automatically agreed for implementation and a realistic timescale set in partnership with Translink.

2.4 The Council would like to seek clarification on the criterion used to deliver the innovative door-to-door bus service in areas for people with disabilities. What is the criterion used to identify the areas chosen for this service (Ballycastle, Ballyclare, Ballynahinch, Kilkeel, Magherafelt, Newcastle, Portrush, Portstewart and Warrenpoint) and what are the proposals to roll this out to other areas to accommodate people with disabilities.

3. Rural Provision

3.1 Bus services in rural areas of Northern Ireland continue to be an issue. Whilst it is stated that a number of services may not seem economically viable, as stated in your document, they are a social necessity, particularly given that 20% of rural households do not have access to a car.

3.2 In relation to identifying the need, business case for provision of a rural bus service, it is important that the supply and demand factor is considered. For example the document states that the percentage of people using public transport to travel to work is consistently low in rural areas, around 4 – 5 % in rural settlements and only 3% people in a small hamlet or open countryside. Given that a bus only accesses a rural settlement once a day return and 3 times per week return this would not be too startling. If the supply was provided then the demand figures may be quite different.

3.3 The commitment to provide innovative demand responsive transport services to isolated rural communities through taxi buses, shared taxis and social car schemes are critical. The proposed 6 million pound to provide a shared taxi scheme is not a vast sum of money given the overall commitment to transport across the region.

3.4 It is important that good practice rural transport schemes are included which would provide good value for money. At present rural community transport schemes established as voluntary partnerships are running effective rural demand responsive schemes, particularly targeting vulnerable section 75 groupings such as Older people and people with disabilities. Sourcing of funding for rural community transport schemes remains an issue.

3.3 Dungannon & South Tyrone Borough Council would welcome a Rural Rover service in rural areas across Northern Ireland. It would like to seek further clarification to the criterion used to implement this service as a pilot in South West Fermanagh and Newcastle to Belfast, particularly in light of diagram 4.2. It would also seek a realistic timescale to develop a much-needed service in an isolated rural area such as Dungannon Borough.

3.4 School transport provision remains an issue for rural areas. At present key school transport services are being cut which is having an impact on rural schooling. There is also a knock on impact on other government initiatives

such as childcare and women back to work and health initiatives in terms of children having longer bus journeys and waiting times.

3.5 The Council would seek clarification as to the proposed highway measures, routine maintenance, bridge strengthening schemes and street lighting capital programmes and associated finance provision for rural areas and OUA within the Dungannon & South Tyrone Borough.

3.6 The Council would question 341 million in terms of network management for rural and OUA areas, given that the full cost for initiatives in these areas is 315.2 million. The cost for managing the road network inclusive of staff, buildings and information technology is greater than the initiatives planned.

4. Developer Responsibility

4.1 Dungannon & South Tyrone Borough Council welcomes the innovative step by the Department to ensure developers are responsible for the provision of transport links from residential development areas to the built up areas.

5. Timetables and Information

5.1 Given the changing social structure of Northern Ireland in terms of a more diverse population. It is important that information is provided in other languages particular in areas in the region most relevant such as Dungannon, Armagh, Cookstown, Craigavon areas. This is of particular necessity to public transport given that the migrant worker population, in the majority, does not have access to a car.

6. Technical Supplement Dungannon & South Tyrone Borough

6.1 Please see attached comments on the proposed technical supplement that Dungannon & South Tyrone Borough Council endorses as part of it's response to the SRTP.