

Individual response to the Local Development Plan by [REDACTED]

1. Housing

I support the Policy HOU8 Specialist Residential Accommodation objectives outlined on p.49 of the Plan. I also strongly support *Strategic Policy SP1 Sustainable Development and Climate Change, Strategic Policy SP2 Enhancing Design and Place Shaping, Strategic Policy SP3 Developer Contributions and Planning Agreements.*

In the *Spatial Growth Strategy and Settlement Hierarchy*, I welcome the objective:

To provide for approximately 11,000 new homes by 2035 across a mix of housing type, size and tenure in accessible locations.

However, I am shocked by only 7 new houses being proposed for for my village, Dundrum, when I know that local people have great difficulty in finding both owned and rented accommodation here, particularly affordable accommodation.

In large part this is due to developers having a free hand in constructing properties for the holiday let and second home market, encouraged by a Council that is obsessed with tourist development, ignoring local needs. Much of this accommodation lies vacant for long periods of time, which is a scandal, given high rates of homelessness. Your plan needs to tackle this issue.

I welcome *Policy HOU7 Adaptable and Accessible Homes*

But I am very concerned by the statement in that Policy that;

It should be noted that the policy is not intended to meet full 'Lifetime Homes' standards or deliver fully wheelchair accessible homes, both of which are needed.

I also welcome *Policy HOU8 Specialist Residential Accommodation*

But I wish to object strongly to the lack of stipulations for the number of Adaptable and Accessible Homes and Specialised Residential Accommodation units to be provided by developers. On page 31 Of the Plan it is stated that:

The 2021 Census recorded 10.72% of households were comprised of a single person aged 65+

In 2021 22.9% of the District's population reported having a long-term condition or disability that limited their day to day activities.

And that with an ageing population this is likely to rise.

Without quantified requirements for providing accommodation to deal with this you are totally failing people who fall into these categories and, moreover, increasing the likely collapse of hospital care, due to the impossibility of discharging patients in these categories into suitable accommodation in the community.

Also, I wish to stress the need for those who are elderly and/or have health conditions or disabilities to have adequate space. Visiting my husband's elderly relatives in sheltered accommodation and care homes, I have been appalled by them being confined to spaces in which you could not swing a cat, and rarely having access to communal which are not dominated by a blaring television, or to safe outside green space/s, which are essential to health and wellbeing.

Many elderly and/or disabled people may feel happier in accommodation which is separate from younger/more able people. But equally many may want to be in a mixed age and ability setting, rather than an age/disability ghetto, and this is known to have physical and mental health benefits. More consideration should be given to this.

I support *Policy HOU9 Accommodation for the Travelling Community*

They need proper sites of the variety described.

2. Tourism

I do not support:

Strategic Policy TS1 Sustainable Tourism

The Council is obsessed with tourism, ignoring its extremely bad effect on climate change, the environment and the lives of local people, notably in relation to housing, pollution and difficulties in parking in towns and villages. Projects like the Gondola have been funding led, vanity driven, racked up massive costs and caused vast discontent with the Council and the way it operates behind closed doors, with lip service paid to consultation with local residents.

In relation to climate change the Council blithely ignores the massive impact on carbon emissions of travel by visitors to the district, via air, sea and land routes.

In relation to the environment, it also blithely ignores the impact of visitor footfall in terms of erosion, scaring off wildlife and causing very destructive wildfires.

In terms of housing, the massive increase in holiday let accommodation and second and even third homes, combined with over-promotion of the district's attractions, has meant that there is a real shortage of both purchase and let housing for local people and that prices have risen beyond what many locals can afford. There needs to be a clamp-down on this.

In terms of pollution, the air pollution caused by the increased number of visitor vehicles coming into the district is serious and is known to have major ill effects on health. Of particular concern is the impact on small children walking or pushed in buggies beside our increasingly busy roads and streets, given the known impact of vehicle emissions on their mental development.

Local people are deterred from accessing shops and other facilities because the deluge of visitors is taking up the parking spaces.

Council needs to turn instead to meeting the needs of local people, with care to avoid adverse impacts on the environment and climate change.

3. Transport

In relation to Transport, The Draft Development Plan states that it will:

Promote road safety, in particular for pedestrians, cyclists and other vulnerable road users.

Ensure accessibility for all, with the needs of people with disabilities and others whose mobility is impaired given particular consideration.

However, the plan then goes on to state that it will:

Promote the provision of adequate facilities for cyclists in new development;

And ensure:

Provision of an improved network of attractive and connected radial cycling routes in towns and greenways between settlements;

But there is a complete lack of mention of adequate facilities for pedestrians and ignoring of the fact that cyclists ride ruthlessly on pavements and footpaths in contravention of the Highway Code and endangering all pedestrians, but particularly children and the elderly

and/or disabled/ with health conditions. I am 80 and have serious health conditions. These mean that if I am knocked down, I have a 50% chance of a fracture and am potentially faced with adrenal crisis, a form of shock that can kill within an hour or two, unless I get a very fiddly emergency injection and am taken rapidly to A&E for stabilisation. But walking is essential to my health and wellbeing and to accessing shops, services and friends in my village. Cyclists ignore the fact that they cannot be heard when approaching from behind, often ride very close at high speeds, and expect me to move out of their way onto rough verges, parking spaces, even roads. When I report incidents to the police I can get told that they want cyclists on the pavements because the road is not safe. As a former cyclist, I am sympathetic to their need for safety. But I do not see them lobbying for the road/s to be made safer, eg by reduced speed limits on approaches to settlements, as I have tried to do, albeit with no success.

The Development Plan needs to seriously tackle the issue of pedestrian safety in all locations. It states that:

Walking and cycling infrastructure within and between the district's settlements is largely underdeveloped. The 2021 census¹¹⁰ showed that despite 14.3% of the district's working population living within 2km of their place of work, only 5.9% of the working population travel to work by foot or bicycle. The district has an existing greenway between Newry and Portadown/Craigavon along the Newry Canal, which will extend south from Victoria Lock to the border linking into the Carlingford Greenway. The LDP will protect routes for new schemes and require walking, cycling and public transport as an integral element of development proposals. The Council is exploring a number of other potential greenways including between Downpatrick and Comber. It will support active travel networks and safeguard disused transport routes. A range of infrastructure improvements to increase the use of more sustainable modes will be provided through the Local Transport Plan.

Ensure that user behaviour regarding safe use of the transport network is monitored and addressed.

However, while Greenways are in theory a great idea, in practice, as with the Greenway in East Belfast, there are major issues about safety of pedestrians. Shared routes are not the solution. The Council needs to pursue separate safe routes for cyclists and pedestrians, and to work with Stormont departments, PSNI, and the Westminster government to secure these and also:

the lowering of speed limits on roads, which would make them safer for cyclists, pedestrians and motorists;

removal of misleading Sustrans signs for their cycle routes or replacement with much clearer instructions – the online information for the Sustrans cycle route through my village says that cyclists should ride on the road, but the sign appears to indicate that a cyclist can ride on the pavement and expect any pedestrian to kneel before them, see attached photo;

a major government TV campaign to persuade cyclists not to endanger pedestrians;

all children to receive cycling proficiency education in schools, including training in how to behave towards pedestrians;

a licence number plate for all bicycles so that police are able to take appropriate action when cyclists behave irresponsibly;

serious legal penalties for cyclists who injure or kill pedestrians – the present penalty is woefully inadequate;

suspension of funding for Sustrans until they can demonstrate serious work for safety of pedestrians – I have found their public statements to be overwhelming concerned with the needs of cyclists and have had very poor response when contacting them about pedestrian safety in my village.

4. Renewable Energy

I am generally very supportive of *Strategic Policy RES1 Renewable and Low Carbon Energy*.

But while I welcome the emphasis on what can be achieved by solar power, heat pumps and battery storage, I would like to state that there are many, like myself, who find wind turbines beautiful, while being fiercely opposed to them being located in sites that will result in destruction of peat bogland.

5. Flood risk and drainage

Strategic Policy FRDS1 Flood Risk and Drainage appears to me to be too weak, with too many potential loopholes in it, and insufficient recognition that forecasts of flooding are constantly being outstripped, due to the remorselessly accelerating progress of climate change.

6. Protection of the Environment

Strategic Policy ENVS2 Protecting, Conserving, Enhancing and Restoring Natural Heritage and our Valued Landscapes appears to me to be very lacking in detail.

It does not contain measures to preserve the green spaces in towns and villages, which are often a significant part of their historic heritage, as well as being vital to the lives of inhabitants.

It does not provide a commitment to stop top-down Council “improvement” schemes, which often destroy existing trees and plants in a pursuit of sterile tidiness, with any replacements generally comprising easily managed, visually boring and environmentally generally useless evergreens.

It talks about the tourist value of the District’s natural heritage, without pausing to think how tourism destroys it through visitor travel causing massive carbon emissions, erosion caused by tourist footfall and the thoughtless causing of wild fires.

It blithely ignores the Council’s own recent pursuit of the Gondola project, which would have caused massive environmental damage.

It makes no mention of working in collaboration with such organisations as the National Trust and Mourne Heritage Trust.

7. Coastal Development

I support *Strategic Policy CDS1 Coastal Development* although it is remarkably lacking in detail

8. General overall comments

We need to have a commitment to action, and a rigorous attention to meeting targets on the points I have raised in my comments on different policies.

We need transparency by the Council, with publication of minutes of all committees and sub-committees.

We need ongoing consultation with local residents on the planning policies with their views properly taken on board.