

Colin Mckeown

From: DevelopmentPlan@midulstercouncil.org
Sent: 21 April 2020 11:27
To: Colin Mckeown
Subject: FW: draft Plan Strategy re-consultation

From: Chris Bryson [REDACTED]
Sent: 21 April 2020 09:44
To: Sinead McEvoy <Sinead.McEvoy@midulstercouncil.org>
Cc: DevelopmentPlan@midulstercouncil.org
Subject: RE: draft Plan Strategy re-consultation

Morning Sinead, good to hear from you and trust you're keeping well also.

Thanks for the clarification. On that basis, our original submissions will not change and please consider our previous submissions as our final ones. For clarity, these are referenced below.

<u>POP</u>	<u>dPS</u>
MUPOP/18;	MUDPS/98;
MUPOP/20;	MUDPS/99.
MUPOP/21;	
MUPOP/109;	
MUPOP/112;	
MUPOP/124;	
MUPOP/270;	
MUPOP/274;	
MUPOP/275;	
MUPOP/277;	
MUPOP/354.	

Thanks.



CHRIS BRYSON MRTPI AssocRICS
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Michael McGibbon

From: Helena McDonnell <[REDACTED]>
Sent: 18 April 2019 16:58
To: DevelopmentPlan@midulstercouncil.org
Subject: Draft Plan Strategy Response - Coalisland (Job No. C03648)
Attachments: DPS Representation - Coalisland.pdf

Dear Sir/Madam

Please find attached our response to the Mid Ulster Draft Plan Strategy on behalf of our client Western Building Systems we have also sent a hard copy in the post.

I would appreciate if you could confirm that you have received this representation.

Should you require any further information please do not hesitate to contact Gravis Planning



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BY EMAIL & POST

18 April 2019

Our Ref: C03648
POP Ref: MUPOP/277

Development Plan Team,
Planning Department, Mid Ulster District Council,
50 Ballyronan Road,
Magherafelt,
BT45 6EN

Dear Sir/Madam,

Re: Response to the Mid Ulster District Council Draft Plan Strategy (DPS) – Lands located along Annagher Road, Coalisland.

This letter is submitted on behalf of our client, Western Building Systems, and relates to the publication of the Draft Plan Strategy (DPS), the second stage in Mid Ulster District Council's Local Development Plan process. It highlights how some draft policies are not sound and proposes how such policies could be amended to become sound. In addition to this we draw your attention to specific lands that we have identified as being suitable for inclusion within the development limit of Coalisland.

Development Plan Practice Note 6 sets out 3 main tests of soundness for Local Development Plans, with each test having a number of criteria, as follows:

Procedural Tests

- P1 Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?*
- P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?*
- P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?*
- P4 Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?*

Consistency Tests

- C1 Did the council take account of the Regional Development Strategy?*
- C2 Did the council take account of its Community Plan?*
- C3 Did the council take account of policy and guidance issued by the Department?*
- C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?*

Coherence and Effectiveness Tests

- CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;*
- CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;*
- CE3 There are clear mechanisms for implementation and monitoring; and*
- CE4 It is reasonably flexible to enable it to deal with changing circumstances.*

MID ULSTER'S SPATIAL PLANNING FRAMEWORK

A Strategic Planning Framework for the Plan was formulated by the Council to support and achieve the Plan Objective as set out on p30-31. The council sets out 17 Plan Strategy Objectives broken up into three broad categories:

- Accommodating People and Creating Places
- Creating jobs and promoting prosperity
- Enhancing the environment and improving infrastructure

A number of Strategic Planning Frameworks have been formulated to accord with them. We are **generally supportive** of the majority of the SPFS's and corresponding policies, with the exception of those as discussed below.

SPF 1 - Manage growth based on sustainable patterns of development balanced across Mid Ulster, in accordance with the Regional Development Strategy with settlement limits defined for all settlements to provide compact urban forms and to protect the setting of individual settlements;

We generally support and agree that growth should be based on sustainable patterns of development and managed and balanced across Mid Ulster, however we do not agree with the restructured settlement hierarchy as shown on page 37 of the Draft Plan Strategy.

Table 1 on p36 provides a summary of the scale of development appropriate to each tier of the settlement hierarchy, it does not provide a local town tier, distinguishing the difference between a main town or a local town. This lack of distinction means there is no rationale for identifying local towns as distinct from main towns in table 2.

Table 2 The Settlement Hierarchy shows a revised hierarchy from the Councils Preferred Options Paper; Coalisland and Maghera have been re-designated as Local Towns. Three former small settlements have been designated villages and nine new settlements have been introduced.

This revised Settlement Hierarchy will have significant implications for those settlements re-designated, in particular Coalisland. The Draft Plan Strategy has provided no clear indication as to why Coalisland and Maghera have both been de-designated to local towns. The Council only propose

to focus growth to the main towns of Cookstown, Dungannon and Magherafelt which will be to the detriment of Coalisland and Maghera.

	Skills	Health	Social	Environment	Commercial	Justice	Productive	Networks
Towns: the main administrative, trade employment and residential centres which provide appropriate development opportunities for housing, employment and leisure activities appropriate to their scale and character. (SPQ2 & SPQ 3)	Further Education, Special Schools, Library, Post Primary	Minor Injuries, Out Patients, Pharmacy Health Centres, Day-care Centres	Leisure Centre, Visitor Centre, Arts & Culture Centres, Social Services, Community Centre, Sports facility, Welfare Services	Recycling, Renewables, Water & Sewers Supply/ Treatment plants, waste-landfill, waste -recycle	Shopping centres, Retail warehousing, Range of Restaurants, Supermarket, Restaurants, Mix of retail facilities	Police Station/ District, County Courts, Probation Service	Industrial Park, Tourism Office, Enterprise Centre, Information Office	Major Roads, Bus/Rail, Park N' Ride, Cycle Network, Link Corridors/Trunk Roads, Bus/Rail to larger centres
Villages: Local service centres which provide opportunities for housing, employment and leisure activities appropriate to their scale and character. (SPQ4)	Nursery, Primary School	Doctor, Ambulance Outreach Services	Local Halls, Play Areas	Access to clean water Sewage disposal	Shop, Pub, Post Office, Petrol Station	Neighbourhood Watch	Workshop/ Business Unit	Local Roads, Broadband, Urban Street Lighting, Local Bus, Cycle
Small Settlements: provide development opportunities appropriate to their size and scale, allowing for single houses and small groups of up to 6 houses. (SPQ5)	Small Settlements may contain only a limited amount of infrastructure at a smaller scale than that contained above in the village's category.							

Table 1: Hierarchy of Settlements and related Infrastructure

Mid Ulster Settlement Hierarchy

Main Towns (Hubs)	Cookstown Dungannon Magherafelt			
Local Towns	Maghera Coalisland			
Villages	Aghaginduff/ Cabragh Annaghmore Ardboe Augher Aughnacloy Ballinderry Ballygawley Ballylifford Ballynakilly Ballyronan The Bush Bellaghy Benburb	Brockagh/ Mountjoy Caledon Cappagh Castlecaulfield Clogher Castledawson Churchtown Clady Coagh Creagh Desertmartin Donaghmore	Draperstown Drummullan Edendork Eglish Fivemiletown Galbally Granville Gulladuff Killyman The Loup Moneymore Moortown	Moy Newmills Orritor Pomeroy The Rock Sandholes Stewartstown Swatragh Tamnamore Tobermore Upperlands
Small Settlements	Aghamullan/ Derryloughan* Ardtree Ballymaguigan Ballynease Culnady Curran Carland Carnteel Dernagh / Clonoe	Derrytresk* Desertcreat Donaghey Drapersfield Dunnamore Dunman Dyan Glen	Glenone Gortacladdy Gracefield Grange Inishrush Killeen Killeenan Kilross Knockloughrim	Longfield Moneyneany Straw Tamlaght Tullyhogue Tullywiggan* Tullyallen/ Edencrannon* The Woods

Table 2: Settlement Hierarchy Classification

Soundness Test

- Spatial Planning Framework 1 is not based on robust evidence (Test CE2) Furthermore, there is no clear rationale for revised Settlement Hierarchy, as local towns are not defined within table 1 of the revised types of Settlements within the Hierarchy.

Remedy

- Table 2 of the Settlement Hierarchy should be revised accordingly with Coalisland and Maghera either re-established as Main Towns again, as per the preferred options settlement hierarchy, or a local town tier should be included within table 1 identifying why Coalisland and Maghera do not fall within the Main Town Tier or Village Tier.

SPF 2 – Focus growth within the three main towns/hubs of Cookstown, Dungannon and Magherafelt and strengthen their roles as the main administrative, trade, employment and residential centres within the District;

Spatial Planning Framework 2 is in direct conflict with Spatial Planning Framework 1 which stipulates *that growth should be managed on sustainable patterns of development balanced across Mid Ulster.*

The inclusion of ‘balanced’ in the SPF1 suggests growth is spread across all settlements in the District, rather than being focused within the hubs.

The Council now plan to focus growth within the Main Towns of Cookstown, Dungannon and Magherafelt. This will have major implications for local towns and settlements such as Coalisland.

SPF 2 suggests that Cookstown, Dungannon and Magherafelt act as the key centres of growth and function as a cluster of public administration and service provision. The Council state that this will assist in maintaining the vitality and viability of the centres by publically investing in improving access, attractiveness and amenity and encouraging private investment by identifying development opportunities and protecting existing retail units in the primary retail core from inappropriate uses. However this will have direct implications on towns such as Coalisland and have a detrimental effect on their vitality and viability as growth will be limited in these areas.

As per page 23 of the Draft Plan Strategy states that 72% of the population of the district lives in a rural area. This definition of rural means that everywhere in the District is classified as rural apart from Cookstown, Dungannon, Magerafelt *and Coalisland.*

Coalisland is the fourth largest town in the District and was established in the early 16th Century as a coal mining center because of the small coalfield nearby. The readily accessible coalfields meant that as well as mining, the town became a thriving industrial town with the industrial/mining legacy still evident today.

In addition to this the current population of Coalisland is 5700 (2011 Census) which represents a growth of 16% since the previous census figures in 2001, therefore it remains unclear as to why growth would not also be focused within Coalisland as there appears to be a clear demand to live/work in the area.

Soundness Test

- Spatial Planning Framework 2 fails to satisfy (CE1) in that it conflicts with SPF 1.
- SPF 2 fails to satisfy the test of soundness (CE 4) in that focusing growth within the three main hubs does not allow for flexibility in dealing with changing circumstances throughout the plan period.
- The policy also fails to satisfy the test of Soundness (CE 2) in that suitable growth across the district has not been distributed.

Remedy

- Reconsider the focus of growth only to the three main hubs. Growth should be managed and balanced across Mid Ulster as per option 1 of the POP which provides for an equitable split throughout the district.

SPF 3 - Consolidate the role of the local towns of Coalisland and Maghera as service centres for their hinterlands providing appropriate development opportunities for housing, employment and leisure activities, in keeping with the scale and character of these settlements;

The re-positioning of Coalisland and Maghera to local towns and the intention by the Council to consolidate growth in these towns means that these settlements are not seen as key centres for growth. This will therefore have a detrimental impact on these settlements, in particular Coalisland. This focus of growth would result in more people travelling to the Cookstown, Dungannon and Magherafelt to live, work and access services and while this would help to increase the economy of the three main towns, this would have a negative impact on Coalisland and other settlements, removing much needed footfall and expenditure that help to grow the vitality and viability of this settlement.

This would also increase the dependency on private vehicles as more people would need to travel to access services which would ultimately result in the Council not being able to meet their objective to facilitate the creation of 8.500 new jobs by 2030 ***in a variety of locations accessible to all members of the public including those without a private car.*** With a District that is primarily rural it is essential that service provision and jobs are balanced across the district and not focused primarily within the three main towns.

The Council's vision is that the three hubs will be supported by the local towns of Maghera and Coalisland. Coalisland has been identified within the DPS as important both as a residential centre and for providing employment. The DPS adds that the range of services available within Coalisland ***ensures it is capable of accommodating further growth***, but only proportionate to its size and function, therefore to only consolidate growth with Coalisland is unfitting and inconsistent.

In addition to this the current population of Coalisland is 5700 (2011 Census) which represents a growth of 16% since the previous census figures in 2001, therefore it remains unclear as to why the Council only wish to consolidate growth within Coalisland, as there appears to be a clear demand to live and work in the area.

Soundness Test

- Spatial Planning Framework 3 fails to satisfy (CE1) in that it is contrary to SPF 1.
- Spatial Planning Framework 2 fails to satisfy the test of soundness (CE 4) in that only consolidating growth within Coalisland and Maghera does not allow for flexibility in dealing with changing circumstances throughout the plan period.

Remedy

- Growth should be managed and balanced across Mid Ulster as per option 1 (the preferred option) of the POP which provides for an equitable split throughout the district.

POLICY ECON 1 – ECONOMIC DEVELOPMENT IN SETTLEMENTS

Within towns, proposals for economic development on land zoned for such purposes will conform with the Plan, subject to meeting any Key Site Requirements. In all other cases, proposals will be determined on their individual merits.

Within villages and small settlements, proposals that are of an appropriate scale, nature and design such as compatibility with nearby residential use, will be given favourable consideration.

Within the justification and amplification section of this policy the Council stipulate that the Plan objectives, seek to have the main employment and service areas located in hubs and clusters i.e. the main towns, where land will be zoned for economic development.

MAIN TOWNS	APPROXIMATE NO. OF HOUSEHOLDS*	% SHARE OF ALL HOUSEHOLDS** (48,072)	% SHARE OF HGI (10,950); total of 30% - 60% apportioned based on relative proportion of all households	HOUSING LOCAL INDICATORS 2015-2030 (units)	COMMITTED UNITS STILL TO BE DEVELOPED AND RESIDUAL ZONING (at 1st April 2015)	ECONOMIC DEVELOPMENT INDICATOR (hectares)
DUNGANNON	5,386	11.2%	12% - 24%	1,314 - 2,628	2,697	60
COOKSTOWN	4,519	9.4%	10% - 21%	1,095 - 2,299	1,661	55
MAGHERAFELT	3,245	6.8%	8% - 15%	876 - 1,642	1,936	55
TOTALS	13,150	27.4%	30% - 60%	3,285 - 6,569	6,294	170 hectares

It is proposed by the Council that the amount of economic development land will be by in large equally split between Dungannon Cookstown and Magherafelt. **We do not agree with the Councils approach to economic development.**

The draft plan strategy identifies that many industrial and business enterprises are located in rural areas within the District (the definition of rural means that everywhere in the District is classified as rural apart from Cookstown, Dungannon, Magerafelt and Coalisland), therefore to focus economic growth within the three main hubs would have a detrimental impact on the district as a whole.

We feel that the appropriate approach for allocating economic land is to apportion economic land based on the population of a town and the people per hectare as per option 3 of the preferred options paper. This approach ensures sustainable growth of settlements as it directly links population growth to economic development. It also utilises established infrastructure without the need for further significant investment in new infrastructure that may be required for the Councils preferred option.

Mid Ulster Council have stipulated that based on the 2011 census 11,599 people lived in Cookstown, 14,340 people lived in Dungannon and 8,805 people lived in Magherafelt and on this basis 60ha of economic land should be allocated to Cookstown, 65-70ha for Dungannon and 40-45ha for Magherafelt, this equates to 193, 195 and 204 people per hectare of economic land respectively.

Therefore based on the minimum amount of economic lands as per option three, a total amount of 165ha economic land should be allocated to the three main hubs with 5ha remaining to supplement the remainder of the district as required based on the identified need of 170ha.

Soundness Test

- It is considered that the policy fails to satisfy the test of soundness – CE4 in that the provision of economic land to only the three main towns does not allow for flexibility in dealing with changing circumstances throughout the plan period.

Remedy

- Economic Land should be allocated based on the population of a town and the people per hectare

Monitoring & Review

The Local Development Plan is intended to be a flexible document which responds to changing needs and circumstances locally. Monitoring will therefore be essential for the delivery of the local development plan and should provide the basis to trigger any requirement to amend the strategy, policies and proposals of the Plan.

Therefore, we broadly support the monitoring indicators set out in in pages 249 – 252, which are to be used to measure how well the plan is performing in terms of achieving its strategic objectives, including ensuring an adequate supply of housing for the district over the plan period. Table 8 provides a detailed explanation of each monitoring indicator.

Objectives	Outcomes	Indicators	Measures
<p>Accommodating People and Creating Places</p> <ul style="list-style-type: none"> To build Cookstown, Dungannon and Magherafelt as economic and transportation hubs and as the main service centres for shops, leisure activities, public administrative and community services including health and education. These are the most populated places and the town centres are the most accessible locations for people to travel to including those without a car. To protect and consolidate the role of local towns and villages so that they act as local centres for shops and community services meeting the daily needs of their rural hinterlands. To provide for vital and vibrant rural communities whilst protecting the countryside in which they live by accommodating sustainable growth within the countryside proportionate to the extent of existing rural communities. To provide for 11,000 new homes by 2030 in a range of housing capable of meeting the needs of families, the elderly and disabled, and single people, at locations accessible to community services, leisure and recreational facilities, for those people with and without a car. To recognise the needs of both growing families and carers of the elderly and disabled by accommodating development which allows people to remain within their own communities and does not lead to significant harm to neighbours or the built and natural environment. To facilitate the development of new community facilities at locations accessible to the communities they serve, through a variety of modes of transportation in accordance with the community plan. To accommodate cultural differences in our communities whilst promoting “shared spaces” to bring people together with equality of opportunity. 	<ol style="list-style-type: none"> New residential development will have provided quality residential environments will have been provided comprising a mix of house types and tenures in our towns and villages and other settlements. At least 30-60% of housing will have been provided in our main towns. Growth will have been focused in our main towns. Sustainable opportunities will have been provided for homes in the countryside to meet the needs of the rural population at a level of not more than 40% of households in the District. New major retail development will have occurred in our town centres. Our town centres will have become more vibrant and viable places for shops and businesses to trade. We will have better health, education and community facilities. 	<ol style="list-style-type: none"> Housing Growth Indicators and subsequent revisions. The extent of housing land available in our main towns and other settlements. Population levels across mid ulster The pipeline for further housing development as defined by unimplemented permissions and housing zonings. The capacity of our town centres to accommodate growth (defined by retail capacity study). The retail offer and vacancy rates in our town centres. 	<ol style="list-style-type: none"> The extent of housing permissions in our main towns and across our other settlements. The take up of zoned housing land. The number of social/ affordable houses delivered in settlements and in the countryside. The take-up of land for health, education and community uses. The take-up of town centre opportunity sites and land available for mixed use development. Vacancy rates and range of uses in our town centres and extent of non-retail related uses in our Primary Retail Cores. The provision of new health, education and community uses in the District. Any additional needs identified by service providers. The number of housing permissions in the countryside by policy justification and the number of registered farms and total number of commercial fishing licences.

Objectives	Outcomes	Indicators	Measures
<p>Creating jobs and promoting prosperity</p> <ul style="list-style-type: none"> To facilitate the creation of at least 8,500 new jobs by 2030 at a variety of locations where they are accessible to all members of the community, including those without a private car. To promote diversity in the range of jobs on offer recognising the importance of employment in the primary sector (agriculture forestry and mining), secondary sector (industry and manufacturing) and tertiary sector (administration, commerce, retailing, leisure and tourism). To recognise and accommodate entrepreneurship, innovation for large, medium and small firms by attracting new firms and accommodating expanding businesses. To recognise the importance of self-employment and home working, particularly in rural locations. To encourage energy efficiencies and promote use of renewable energy. 	<ol style="list-style-type: none"> There will be reduced unemployment and increased economic activity in mid ulster. Agriculture, forestry and fishing will remain an important sector. Mineral extraction will continue to provide sufficient materials for the construction industry and related quarry products sector. There will be sufficient land for economic development in our three main towns. There will be sufficient land for economic development in our other settlements. Economic development will have occurred in a sustainable manner and more people will have been facilitated to work from home or in small to medium enterprises. 	<ol style="list-style-type: none"> Regional indicators and targets for economic growth. The extent of economic development land available in our main towns and other settlements. Employment figures for the District. 	<ol style="list-style-type: none"> Employment figures for the District. The availability of economic development land in our three main towns as established by annual monitoring. The number of permissions for economic development in our three main towns and other settlements (floor space permitted) and anticipated number of jobs which may result. The number of permissions for economic development in the countryside? Self-employment levels in the District.

Objectives	Outcomes	Indicators	Measures
<p>Enhancing the environment and improving infrastructure</p> <ul style="list-style-type: none"> To reduce contributions and vulnerability to climate change and to reduce flood risk and the adverse consequences of flooding. To protect and enhance the natural and built environment as wise custodians of our landscape and to achieve biodiversity, quality design, enhanced leisure and economic opportunity and promote health and wellbeing. To accommodate investment in power, water and sewerage infrastructure, and waste management particularly in the interests of public health. To improve connectivity between and within settlements and their rural hinterland through accommodating investment in transportation to improve travel times, alleviate congestion and improve safety for both commercial and private vehicles as well as more sustainable modes of transport including buses, walking and cycling. To improve connectivity through telecommunications which both meets the needs of business and private households whilst reducing the need to travel. 	<ol style="list-style-type: none"> There will be reduced need to travel by private transport. The special character of our Sperrins AONB will have been retained. The distinctive ridge line of Clogher Valley will have been retained. The open vistas, bog and grasslands of the high Sperrins and Slieve Beagh and the lough shores will have been kept free from harmful development. We will have created more greenways and cycle ways whilst safeguarding our canals and main river banks for future use. We will have protected, maintained and enhanced our natural and built heritage for the appreciation of our residents and visitors. You will be able to travel safer and more quickly between our main towns, within the District and across Northern Ireland. There will be more people walking, cycling and using public transport. Everyone will have improved telecommunications and broadband connectivity. A greater amount of our power will have been from renewable sources. Less waste will go to landfill. As result of the provision of by-passes and improvements to the A29 and A5 there will be greater free movement along our main transport routes. 	<ol style="list-style-type: none"> The Landscape Assessment across Mid Ulster and future review. The pressure for housing across Mid Ulster (pressure analysis). Travel to Work Survey Northern Ireland. Pressure analysis of renewable energy development. The availability of broad band and extent of telecommunication not spots. The total amount of energy from renewable sources (NIE Survey). 	<ol style="list-style-type: none"> The number of permissions for high structures and wind turbines in our Area of Constraint on Wind Turbines and High Structures. The number and type of permissions granted within our Special Countryside Areas. The number of permissions granted for mineral development within our Areas of Constraint on Mineral Development. The progress made in implementing and providing by-passes and major road improvements. The provision of new cycle ways and greenways. The number of permissions granted for major renewable energy development. The amount of waste going to landfill.

However projected housing figures, the number of future jobs predicted and the SPFs specified above should be amended as required in order to enable accurate monitoring of the plan.

Soundness Test

- Objectives 1, 2, and 8 are not sound under which the success of the plan is being assessed and are not based on robust evidence (Test CE2).

Remedy

- Revise as per previous recommendations.

Proposed Site for Inclusion within the Settlement Limits of Coalisland

The site identified in this submission for potential economic use (Annex 1) is located to the east of Coalisland adjacent to the currently settlement development limit, along the Annagher Road. It is a suitable alternative site that could be zoned to accommodate economic land.

These lands are particularly well suited to accommodate expansion of the current settlement limit for the following reasons:

- The subject site is a logical extension of the existing development limit as the site abuts the current settlement limit
- Coalisland is well known as a heavy engineering area with a number of engineering firms in particular Ezystack and DMAC Engineering located along the Annagher Road.
- The site is located on one of the main entry/exit route of Coalisland and is closely related to the town
- There are no physical or environmental constraints such as areas of flooding, or built/natural heritage features and the topography is favourable for development.

Western Building Systems are one of the main manufacturers of modular buildings in Ireland and the United Kingdom and are a major contributor to the local economy. The business currently operates from a large £5million state of the art base in the countryside along the Mountjoy Road between Killeen and Coalisland. Established in 1982 the business is continually growing and investing in new machinery in order to remain competitive, a key attribute to the success of the company is the ability to produce products in house and therefore the space to develop these products is vital.

As recently as February 2015 an application for the expansion of the existing operational business to include another building to be used for light engineering purposes in association with the adjacent site/operations was granted on a portion of land adjacent to the current site of the business (M/2014/0359/F). It is suggested that the lands to the east of Coalisland could be zoned for industrial uses and used to accommodate future growth associated with the business. The continued success of Western Building Systems is crucial to the local economy and this location will ensure that any expansion of the business in the future would not encroach on the countryside and potentially help contribute to the vitality of Coalisland.

It is clear from the points set out above that the subject lands are appropriately located to contribute towards the required amount of lands essential for future economic uses to meet projected creation of jobs for the district. We would therefore respectfully request that they are considered as an industrial zoning and brought within the settlement limit during the forthcoming stages of Local Development Plan preparation.

We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as the LDP progresses.

Yours Sincerely



Helena McDonnell

Gravis Planning

- Site Boundary
- Current Development Limit

