

Submission of a Representation to Mid Ulster District Council Local Development Plan 2030 - Draft Plan Strategy



Comhairle Ceantair
Lár Uladh
Mid Ulster
District Council

Local Development Plan
Representation Form
Draft Plan Strategy

Ref:
Date Received:
(For official use only)

Name of the Development Plan Document (DPD) to which this representation relates MID ULSTER DEVELOPMENT PLAN 2030

Representations must be submitted by 4pm on 19th April 2019 to:

Mid Ulster District Council Planning Department
50 Ballyronan Road
Magherafelt
BT45 6EN

Or by email to developmentplan@midulstercouncil.org

Please complete separate form for each representation.

SECTION A

1. Personal Details

2. Agent Details (if applicable)

Title	MR.	MR
First Name	BRIAN	AIDAN
Last Name	Mac Auley	KELLY
Job Title (where relevant)	- MANAGER.	DIRECTOR
Organisation (where relevant)	Dungannon Enterprise Centre	J. AIDAN KELLY LTD

Address Line 1	2 Coalisland ROAD	50 Tullycullion ROAD
Line 2		
Line 3	DUNGANNON	DUNGANNON
Line 4	CO TYRONE	CO TYRONE
Post Code	BT 71 6JT.	BT 70 3LY.
Telephone Number	[REDACTED]	[REDACTED]
E-mail Address	[REDACTED]	[REDACTED]

SECTION B

Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

3. To which part of the DPD does your representation relate?

- (i) Paragraph 4.14
- (ii) Objective N/A
- (iii) Growth Strategy/
Spatial Planning Framework SPF 2
- (iv) Policy OS 1
- (v) Proposals Map District Proposal Map 1e - Detail Map 1.3
- (vi) Site Location DUNGANNON.

4(a). Do you consider the development plan document (DPD) is:

Sound

Unsound

4(b). If you consider the DPD to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6 (available on the Planning Portal Website at <https://www.planningni.gov.uk/index/advice/practice-notes/development-plan-practice-note-06-soundness-version-2-may-2017-2a.pdf>).

Soundness Test No.

CE2

5. Please give details of why you consider the DPD to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

If you consider the DPD to be sound and wish to support the DPD, please set out your comments below:

SEE ENCLOSED DOCUMENTS

(If not submitting online and additional space is required, please continue on a separate sheet)

6. If you consider the DPD to be unsound, please provide details of what change(s) you consider necessary to make the DPD sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. There will not be a subsequent opportunity to make a further submission based on your original representation. After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

SEE ENCLOSED DOCUMENTS.

(If not submitting online and additional space is required, please continue on a separate sheet)

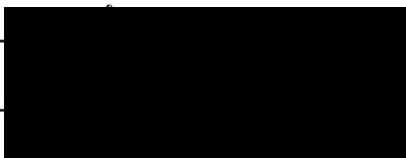
7. If you are seeking a change to the DPD, please indicate if you would like your representation to be dealt with by:

Written Representation

Oral Hearing

Please note that the Department will expect the independent examiner to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Signature:



Date:

Separate Sheet No. 1

Section B - No. 5

Please give details of why you consider the DPD to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Test of Soundness CE2:

The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;

Response from Dungannon Enterprise Centre:

Strategy and Allocation

Dungannon Enterprise Centre (DEC) are of the firm opinion that the draft Plan Strategy falls short in meeting this requirement for soundness. DEC believe that the Economic Development Zones which have been allocated to North Dungannon, should have been allocated to the land which surrounds the existing Dungannon Enterprise Centre at Coalisland Road, Dungannon.

Dungannon Enterprise Centre's own business complex, located at 2 Coalisland Road, has proven to be in high demand. The Centre was extended in 2005 (M/2005/0321/F & M/2005/1332/F) and each of the business units within the existing centre are currently occupied. The Centre has therefore identified the need for further expansion in the relatively near future.

The draft Plan Strategy has identified that there is a shortage of economic development land in Dungannon and has provided for an additional 'interim' offering of land (in Dungannon North and Granville) to provide this use in the period leading up to the introduction of the Local Policies Plan. The Dungannon North lands, as identified on Map 1.3 of the draft Plan Strategy are located to the North of the existing Dungannon Enterprise Centre and on lands outside of the control of the Centre. As identified in the draft Plan Strategy there is a clear need for industrial lands within Dungannon and the existing Dungannon Enterprise Centre is operating at full capacity. The most logical approach here should be to look at options to expand the existing offering at the Enterprise Centre on Coalisland Road. It is noted that the lands which surround the existing centre are zoned for Open Space/Recreation, however there is potential here to expand the existing industrial area. It would be a much more sustainable approach to try to accommodate this expanding industrial need within the existing Enterprise Centre as opposed to creating additional lands which will require the provision of services and infrastructure which is already available at the existing Centre.

The allocation of these 'interim' economic lands within the draft Plan Strategy is a clear indication of the market demand for economic/industrial space within the Dungannon area of Mid Ulster. It is noted that the Preferred Options Paper (POP) indicates that it is the preferred option of the Council to distribute/allocate economic/industrial lands proportionately between the three main towns – i.e. 55-60ha of zoned industrial lands in Dungannon, Cookstown and Magherafelt. DEC is of the opinion that this is not a fair or accurate reflection of market demand and whilst the idea of proportionate distribution may seem like a good idea, it does nothing to resolve a clear shortage of this type of development land within Dungannon. A more realistic approach is required here. It is the experience of DEC that 55-60ha would be insufficient to accommodate the rising appetite amongst manufacturers (many of whom are engineering businesses servicing global markets) for continued expansion and growth. This type of growth requires additional staff and fundamentally additional space.

It is noted that the existing lands which surround Dungannon Enterprise Centre from every angle, are zoned for open space/recreation. This ultimately acts as a restriction on the ability of the Centre to expand. Based on the evidence provided within the Preferred Options Paper (and supplementary papers) as well as the draft Plan Strategy it is clear that expansion of this key economic/industrial centre will be required. It is therefore unsustainable to surround the entirety of the site with a recreational zoning. Dungannon Enterprise Centre have recently acquired an area of land to the north of the existing site and have been in early discussions with Mid Ulster Council surrounding a land swap involving said lands and a long strip of land to the immediate north of the existing site (bounding the Enterprise Centre towards the north west – see Location Map attached). Dungannon Enterprise Centre are of the firm opinion that this area of land, which currently serves as a playing field, presents an area of land which would be much better served as economic/industrial zoned lands which allowed the facility to grow and expand, in accordance with predicted trends, over the next 10 to 15 years. This would present a much more sustainable approach to facilitating additional economic/industrial lands without the need for service and infrastructure requirements. Consolidating the industrial lands in this way would present a more sustainable approach to land management, as opposed to the scattered approach which is currently proposed.

Another element to this is the fact that Dungannon Enterprise Centre provides facilities and amenities to those businesses which occupy their units. This includes training and meeting facilities as well as technology and up to date services. This benefits the businesses who occupy this type of facility and keeping this type of activity together will ensure that these businesses, a lot of whom are start up companies, can continue to benefit from the consolidation of services/facilities.

On the basis of this information it is clear that the current strategy and allocations, included in the draft Plan Strategy, are unrealistic, unsustainable and as such inappropriate. The Council have neglected to consider the existing Dungannon Enterprise Centre and the sustainable alternative which would allow for the extension of the existing centre without creating economic development lands elsewhere in the settlement. The Council have failed to establish a robust evidence base for the inclusion of the Dungannon North lands being included in the draft Plan Strategy.

Policy

DEC also has question marks over the soundness of Policy OS 1 which is included in the draft Plan Strategy. Policy OS 1 relates to the protection of open space and lands zoned for open space and recreation. As noted above, the lands which surround DEC is zoned for open space and recreational uses and as such this restricts the ability of DEC to expand. Whilst DEC are of the opinion that open space should be protected across the Local Authority Area, they are concerned that Policy OS 1 is too restrictive. DEC note the provisions of the SPPS and para. 6.205 therein, wherein it states that there will be an exception to the loss of open space for proposals which do not create a significant detrimental impact. The policy provision contained within the SPPS is less onerous and allows for a situation where open space can be lost as long as there is no **significant** detrimental impact. DEC suggest that this policy be revised to incorporate a less onerous exception which would allow for a less restrictive approach to the protection of open space.

Separate Sheet No. 2

Section B - No. 6

If you consider the DPD to be unsound, please provide details of what change(s) you consider necessary to make the DPD sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. There will not be a subsequent opportunity to make a further submission based on your original representation. After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

Strategy and Allocation

The Preferred Options Paper (POP) for the Mid Ulster Area outlined the Council's preferred approach for the allocation of economic development lands in the LDP. The preferred option was Option 1 which would provide each of the towns (Cookstown, Dungannon, and Magherafelt) an equal share of economic development land aiming to provide around 55-60 hectares minimum in each town. Whilst this may, in theory, appear beneficial and proportionate, there is another side to this which should be examined. The POP identifies that whilst on the surface there appears to be a large supply of zoned industrial land for uptake and sufficient to provide the necessary jobs, this masks a market failure. Uptake has been small primarily due to land owners not releasing land for industrial development. Where accessible serviced sites have been provided up take has been high in the case of Invest NI's Granville Industrial and Business Park. The same principle applies in this instance – Dungannon Enterprise Centre is an existing serviced site and their occupation figures show a clear appetite within the local economy to avail of the facilities they have on offer. Once again this points to the fact that restricting the potential for further growth at this location would be to the detriment to the wider area, and re-allocating this type of land use to other 'new' sites does not work.

In order to make the DPD sound and to conform with CE2, the draft Plan Strategy should include the area to the rear of the existing DEC, marked red in the attached Location Map, as opposed to (or in addition to) other lands which have been identified which, for the reasons documented, would be unsustainable. The inclusion of these lands as economic development lands would be a much more logical approach and is supported by a firm evidence base – see Response Sheet 1. DEC have experienced first hand the market demand for this type of space in Dungannon.

Policy

Policy OS 1 should be amended to allow for the loss of open space in circumstances where there is no significant detrimental impact. This will obviously retain a firm level

of security for existing/zoned open space and it will allow for each application to be assessed on its own merits. Taking this type of approach to the protection of open space is in keeping with the provision contained within the SPPS and as such is a much more sustainable and evidence based approach.

Map

