

Sinead McEvoy

From: Theresa Cassidy <info@tctownplanning.co.uk>
Sent: 19 April 2019 13:52
To: DevelopmentPlan@midulstercouncil.org
Subject: REF: G/018/19 - Representation for draft Plan Strategy
Attachments: Representation to Mid Ulster Council 19.04.19.pdf

Dear Sir/Madam,

Please find attached representation in response to Mid Ulster Council's Draft Plan Strategy public consultation; a hard copy of same will also be delivered to your office this afternoon. I trust this will be given appropriate consideration in the next stage of the plan process.

The representative reserves the right to make further submissions at the appropriate stages.

If you require any further information or clarification please do not hesitate to contact me on the number listed below.

Kind regards,

Theresa Cassidy BSc (Hons) MSc (Ecology & Conservation)

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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

DRAFT PLAN STRATEGY

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

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

2. Agent Details (if applicable)

Address Line 1	16 MULLACHBANE RD.	UNIT 12 C
Line 2	DUNGANNON	THE BUSINESS CENTRE
Line 3	C. TYRONE.	80-82 RAINEY ST.
Line 4		MAGHERAFELT.
Post Code	B770 1SR.	B745 6AJ.
Telephone Number		
E-mail Address	<u>info@tctawplanning.co.uk.</u>	

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 2.5, 4.13 + 4.14
- (ii) Objective _____
- (iii) Growth Strategy/
Spatial Planning Framework SPF 6
- (iv) Policy RIPA'S + ECON 3.
- (v) Proposals Map 1.2 + 1.3.
- (vi) Site Location KILLYLISS RD, GRANVILLE

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.pdf>).

Soundness Test No.

CE 3 + CE 4 .

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:

PLEASE REFER TO THE APPENDED PAGES.

(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.

PLEASE REFER TO THE APPENDED PAGES.

(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:

Part 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.

The following comprises a two prong approach on Spatial Planning Framework 6 (SPF 6) with regards to Rural Industrial Policy Areas (RIPA's) and Policy ECON 3 of the draft Plan Strategy (dPS) addressing where it would appear to meet and fail Soundness Test No.'s CE3 and CE4. In the interest of attempting to provide clarity SPF 6 and Policy ECON 3 of the dPS will be addressed in turn.

SPF 6 – Accommodate development within the countryside that supports the vitality and viability of rural communities without compromising the landscape or environmental quality and whilst safeguarding our natural and built heritage

The dPS highlights that 8,500 new jobs are to be created throughout the plan period; current employment rates also need to be sustained.

Paragraph 2.5 – Economic Trend outlines the various industries providing a wealth of employment for the district and states:

“...The District is significantly more dependent on the construction and manufacturing sectors than the rest of Northern Ireland. For instance, 27.5% of all jobs in Mid Ulster are in manufacturing and 8% are in construction, compared to regional figures of 11% and 4.2% respectively (Census for Employment, NISRA, July 2014). The high prevalence of manufacturing is in part linked to a thriving minerals industry in the District, particularly the extraction of sand and gravel. As a spin off to this extraction activity, there is a very strong manufacturing sector specialising in crushing and screening equipment. It has been estimated that Northern Ireland provides 40% of the world's screening and crushing equipment and undoubtedly, a large proportion of this is supplied by companies within Mid Ulster.”

Paragraphs 4.13 & 4.14 of the dPS states:

“A generous supply of economic development land should be maintained across the life of The Plan and where uptake of industrial land is high additional land will be zoned in the Local Policies Plan or at plan review.

“In recognition of the shortage of economic development land in Dungannon an additional interim supply has been identified at Dungannon and Granville. Maps 1.2 – 1.3 identify the sites and Key Site Requirements (following the maps) identify those issues be addressed in respect of each. The sites are also identified on the wider District Proposals Map.” (my emphasis)

Option 2: More Flexible approach tailored to Mid Ulster, was the preferred option identified in the Preferred Options Paper (POP) and this seems to have been carried into the Draft Plan Strategy (dPS) with the introduction of the Rural Industrial Policy Areas (RIPA’s) forming part of the overarching principle behind SPF 6.

The RIPA policy is in response to paragraphs 4.35 to 4.37 of the dPS and is an innovative and progressive approach by the council. It clearly states that the council has listened and understands the needs of the local people and is prepared to safe guard, where appropriate, established enterprises in the countryside ensuring economic growth and prosperity operate sufficiently and smoothly throughout the plan period. This approach is commendable and should be upheld and adopted into the Plan Strategy.

Although this stage of the process does not deal with site specific locations, the land highlighted in Figure 1 following indicates that this land may fall within the spirit of RIPA’s. These lands are located immediately south of Granville, Dungannon and access is off the Killyliss Road which leads directly onto the dual carriageway. In accordance with the criteria listed in paragraph 4.37 of SPF 6, the attached land meets the parameters of RIPA in that it is:

- wholly located within the rural area;
- is not within or close to a RAMSAR, SPA, SAC, ASSI or SLNCI as confirmed by Map No. 1b – Dungannon and South Tyrone Borough (East) of the extant Dungannon and South Tyrone Area Plan 2010 (DSTAP), and the Northern Ireland Environment Agency – Natural Environment Map Viewer; the site included in Figure 1 as retrieved from the said map viewer;

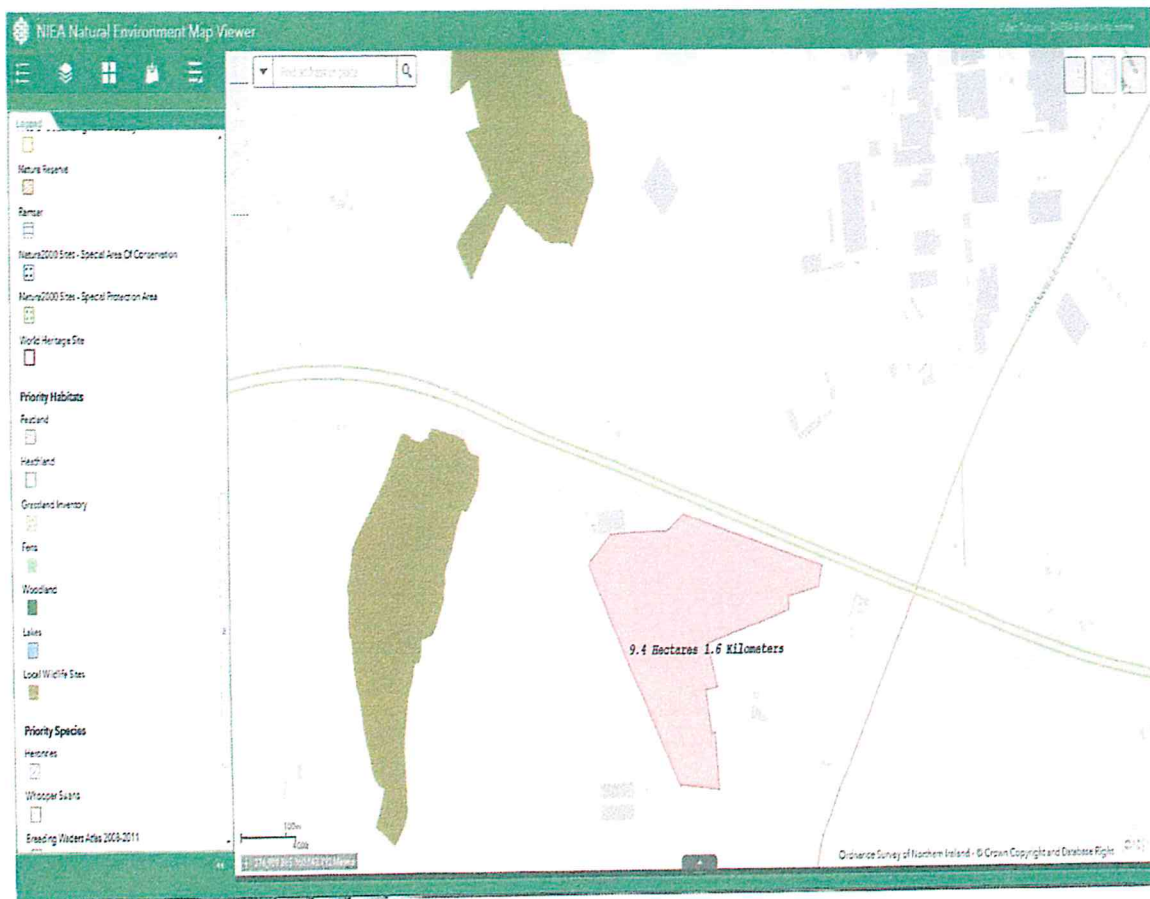


Figure 1 – Site outlined in red not within an environmental designation (Map not to scale)
 Source: NIEA – Natural Environment Map Viewer

- a business use operates from land immediately adjoining the site to the north and Granville industrial lands are located on the other side of the road to the north;
- the adjoining business use is economically viable and occupied;
- there is an existing access onto Killyliss Road which quickly connects with the dual carriageway leading directly to Belfast and other major towns;
- the site abuts one of the major transport corridors for Northern Ireland linking the north to the south, surrounding cities and towns;
- although in close proximity to the dual carriageway there is sufficient vegetation to provide an adequate degree of integration but not to the extent that the land does not read with the existing adjoining business use and surrounding farm buildings in the landscape;
- the existing business use does not cause detriment to surrounding amenity and the land use could be addressed at the LPP stage.

SPF 6 acknowledges in paragraph 4.35 that:

“Mid Ulster also differs from other areas due to the successful economic developments located within the countryside. This success is because the industry is linked to the countryside by way of agriculture or mineral development or related engineering.”

The land included in Figure 1 has been the subject of interest by private businesses owners in the area as they recognise it as an ideal site due to transport links, proximity to infrastructure i.e. three phase, new gas line to the south etc and is associated with existing businesses immediately adjoining and at Granville.

To what scale does existing industrial activity need to operate at to meet the RIPA designation?

Can this also be associated with established enterprises in the locality that may not immediately adjoin the land but are visually connected?

RIPA policy does not identify a threshold, is this then a subjective test?

With regards to the above RIPA may not fully meet soundness tests CE 3 and CE 4 in this regard.

ECON 3 – Protection of Zoned Land and Existing Economic Development Sites

The draft Economic Development Zones identified in Map 1f – District Proposals of the dPS show nodes of land concentrated around Dungannon and Granville. Clearly a need for additional economic land in this locality has been identified by the council during their monitoring process and as a possible consequence of representation made at the POP stage.

The policy does include some flexibility for alternative uses to be permitted on this type of zoned land and this could compromise the ability of the plan to provide the ample supply of economic development land throughout the lifetime of The Plan highlighted in paragraph 4.13 of the dPS. This may also jeopardise the delivery of 8,500.

Part 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.

With respect to RIPA's providing a degree of clarity on site selection would prove useful for the next stage of the plan process. Ongoing monitoring would be an option to determine how each potentially adopted designation is progressing throughout the plan period. Each could be assessed on its own merit identifying any need for possible extension to the site boundary. This would enable the council to justify extension whereby this is not speculative and is attached to an established business on site with genuine need for an extension.

Criterion (e) of Policy ECON 2 does not distinguish between an expansion for isolated business sites or potential RIPA's. Possibly the criterion should differentiate between the two types of development schemes as these could vary considerably in scale and need.

It is reasonable to assume that the economic zonings at Granville have evolved due to the scale of established industrial businesses at this locality and the exceptional direct links to Belfast and the south via the existing dual carriageway leading to the M1 nearby.

Reserving land for economic development in the future if required would also ensure the integrity of Policy ECON 3 is not compromised. A phased approach of economic land supply may be required to meet the 8,500 jobs that the dPS aims to deliver throughout the plan period. However, this number is not capped and providing additional land within proximity to nodes of established industry, at the edge of settlements and with direct links to a main arterial route would be a mechanism to enable the council to remain flexible and address changing circumstances that may arise throughout the duration of the plan.

Considering additional land in proximity to these nodes associated with the industrial presence in the area would be in accordance with soundness tests CE 3 and CE 4.

Comment

The introduction of RIPA's is commendable. By proposing this innovative policy the council realises the importance of economic activity in the countryside and aim to safeguard and sustain, where appropriate, established centres that contribute to the rural and wider economy and provide skilled employment normally within short travel time of their homes. This reduces the need to commute long distances for work and retains expenditure within the locality in the interest of sustaining rural communities.