

**ANNEX B – Response Pro-forma**

**Name: CONOR COCHRANE**

**Address: 5 Oxford Street, Belfast, BT1 3LA**

**Original Representation Reference Number: MUDPS/50 (for administrative use only)**

**Please tick the applicable box below.**

- a) I confirm that I wish for my original representation to be considered as my representation.

- b) I confirm that I wish to amend or add to my original representation.

- c) I confirm that I wish for my original representation to be withdrawn and that I no longer wish to make a representation.

**Signature:**



**Date:** .....16/03/2020.....

If you require assistance when completing the above, please contact [developmentplan@midulstercouncil.org](mailto:developmentplan@midulstercouncil.org)

**Please ensure you return this completed Pro forma (along with any additional documents if you have ticked [b]) above) to Development Plan Team, Planning Department, Mid Ulster District Council, 50 Ballyronan Road, Magherafelt, BT45 6EN, by 5pm on 21st May 2020.**

5 Oxford Street, Belfast BT1 3LA  
t | 028 9043 4393  
e | enquiries@clydeshanks.com  
clydeshanks.com


**CLYDE SHANKS**

Planning Development

Planning LDP Team  
Mid-Ulster Council Offices  
50 Ballyronan Road  
Magherafelt  
BT45 6EN

**BY E-MAIL**16<sup>th</sup> April 2019

Our Ref: Matter 25

E: 

Dear Sir/Madam,

**REPRESENTATION TO LOCAL DEVELOPMENT PLAN (LDP) – LANDS AT KILLYFADDY ROAD, MAGHERAFELT****MID ULSTER DISTRICT COUNCIL****MUPOP/295**

We write on behalf of our client JFM Construction, in relation to the Council's recently published draft Plan Strategy. This letter relates to the strategic theme of housing, and provides commentary on our client's lands south of the town stretching from Killyfaddy Road towards the newly implemented Magherafelt by-pass. We have also for completeness attached a copy of our client's representation to the Preferred Options Paper, which was given the reference number MUPOP/295 by the Council.

**Growth Strategy and Spatial Planning Framework***Spatial Planning Framework*

We remain of the view that the framework elements SPF1 – SPF6 are in theory in accordance with the strategic direction of the RDS. However, the actual housing allocation figures articulated in Appendix 1 do not reflect a coherent strategy and in practice will not result in growth being focused within the three main towns nor will it result in a sustainable pattern of development in the countryside.

Rather, due to the equitable split of housing across the settlement hierarchy and countryside, and the very substantial over-subscribing of housing identified in large part due to existing committed developments, the proposed allocations will encourage a dispersed pattern of settlement and place undue pressure on the countryside from a landscape, environmental and infrastructure perspective.

The disconnect between the strategy and the figures in Appendix 1 is most stark in relation to the HGI. The HGI for Mid Ulster is identified as 11,000 houses pro-rata over the plan period to 2030. However, when the actual capacity of

settlements and equitable split of the HGI as identified in Appendix 1 is tallied with the 40% housing in the countryside it results in a total of 19,074 dwellings. This is over 170% of the HGI.

This creates fundamental tensions between the strategy and the proposed growth/allocation that are not grappled with in the draft Plan Strategy. This substantial over-allocation would not be sustainable as previously articulated as it provides such a generous spread of housing across the settlement hierarchy there is no mechanism to direct growth to the main towns.

Whilst SPF6 states that the countryside will not be subject to an allocation of the District's HGI, this is not the case in reality. Any dwelling constructed within the District boundaries during the Plan period counts towards housing growth, irrespective of how it is characterised. If 4,300 dwellings are built in the countryside during the plan period, this is 40% of the HGI allocation whether or not the Council chooses to call it such.

It is clear that there is a need for the Council to follow through on its strategy and make difficult decisions on where to reduce growth in order to genuinely seek to achieve sustainable patterns of development. In our view this must start with a significant reduction in housing allocated to the countryside, and that this must be delivered through the provision of more restrictive area-specific or district-wide rural housing policies.

### Site Specifics

The site extends approx. 3.06 Ha gradually falling away from NE to SW with access gained via the Killyfaddy road south of the settlement of Magherafelt and defined by existing hedgerows on all boundaries.

### Summary

We would respectfully request that our client's lands located to the south of the town stretching from Killyfaddy Road towards and up to the newly implemented Magherafelt by-pass are zoned for residential development and included within the SDL for Magherafelt in the emerging Local Development Plan for the strategic and site-specific reasons outlined above.

We believe there is a compelling case for the lands to be zoned to assist the Council in increasing the amount of housing delivered within Magherafelt.

I trust the above is helpful to the Council in progressing the draft Plan Strategy and look forward to further input as appropriate as the Plan progresses.

Yours Sincerely,



Conor Cochrane  
Senior Planner

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clydeshanks.com

**CLYDE SHANKS**

Planning Development

cc. JFM Construction  
Enc. MUPOP/295



**Preferred Options Paper  
Representation Form**

Ref:
Date Received:
(For official use only)

*This form can be used to submit your representation to the Preferred Options Paper. Representations can also be made in writing or via email to the address detailed at the end of this form.*

**SECTION A**

1. Personal Details      2. Agent Details

Title	JFM Construction Ltd.	Clyde Shanks
First Name	C/O Agent	Matthew
Last Name	-	Doak
Job Title (where relevant)	-	Planner
Organisation (where relevant)	-	Clyde Shanks
Address Line 1	-	5 Oxford Street
Line 2	-	Belfast
Line 3	-	-
Line 4	-	-
Postcode	-	BT1 3LA
Telephone Number	-	[REDACTED]
Email Address	-	[REDACTED]

**SECTION B**

**Your comments should be set out in full. This will help the Council understand the issues you raise to inform the preparation of the Local Development Plan.**

2. To which part of the POP does your representation relate?
- (i) Page Number (s) – 22 to 24 and 128 to 129
  - (ii) Subject (s) – Housing Growth [Magherafelt Town]
  - (iii) Policy Ref (s) – N/A
  - (iv) Map Name (s) – Magherafelt Settlement Development Limit Options 1-4

## **A. Introduction**

JFM Construction Ltd. owns/controls lands south of the town stretching from Killyfaddy Road towards and up to the newly implemented Magherafelt by-pass.

## **B. Purpose**

Include lands as zoned for housing and within the SDL of Magherafelt for the new plan period.

Please read this site specific representation along with Clyde Shanks strategic representation regarding the preferred housing growth option.

## **C. Strategic Matters**

The landowner acknowledges that this first stage of the LDP relates to 'strategic' issues but that MU Council has welcomed site specific representations now. They further acknowledge that the Council have a stated preferred option for zoning housing land, option 1, which promotes a 'equitable split' between settlements to ensure that towns provide at least 27% of new housing while the rural area should not exceed a maximum of 40% of the dwellings.

## **D. Site Specific Matters**

Notwithstanding the strategic issue, the following sets out the high level merits of the land.

The landholding could yield 61 units over the 3ha and represents a natural extension of the SDL bound by zoned open space to the east.

See attached environmental matrix setting out site context/characteristics – Annex 1. In terms of protective designations (built heritage and flood risk) see Annex 2 for exhibits.

Signature:  on behalf of Clyde Shanks Date: 27 January 2017

You are encouraged to provide your comments via email to the following email address:  
[DevelopmentPlan@midulstercouncil.org](mailto:DevelopmentPlan@midulstercouncil.org)

Or to the following postal address:

Dr Chris Boomer  
Mid Ulster Area Planning Manager  
Magherafelt Council Office  
50 Ballyronan Road  
Magherafelt  
Co L Derry  
BT45 6EN

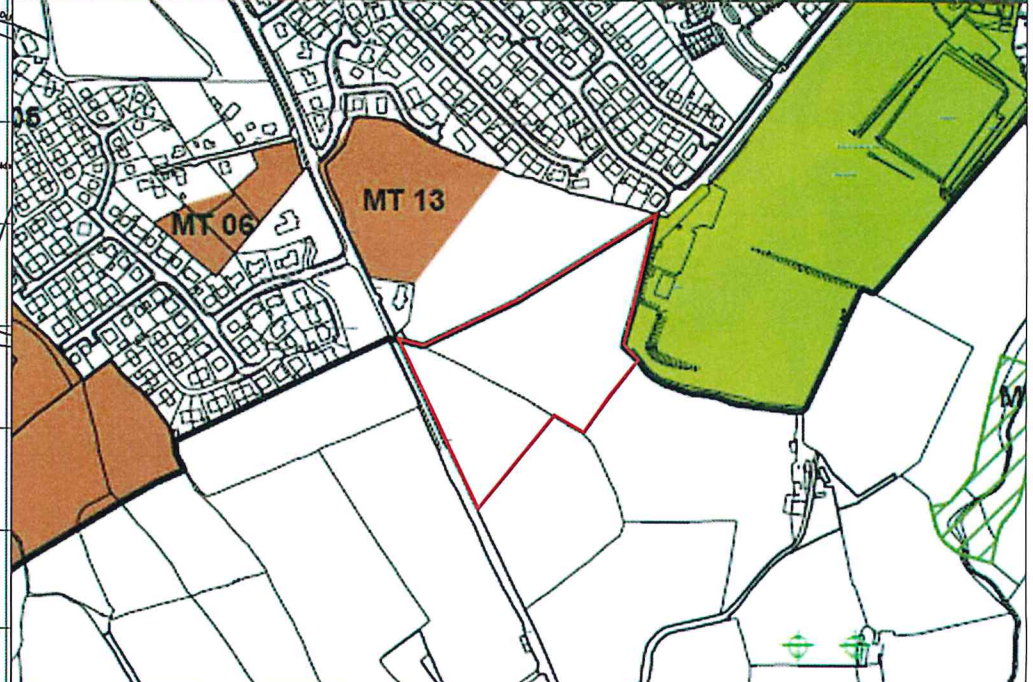
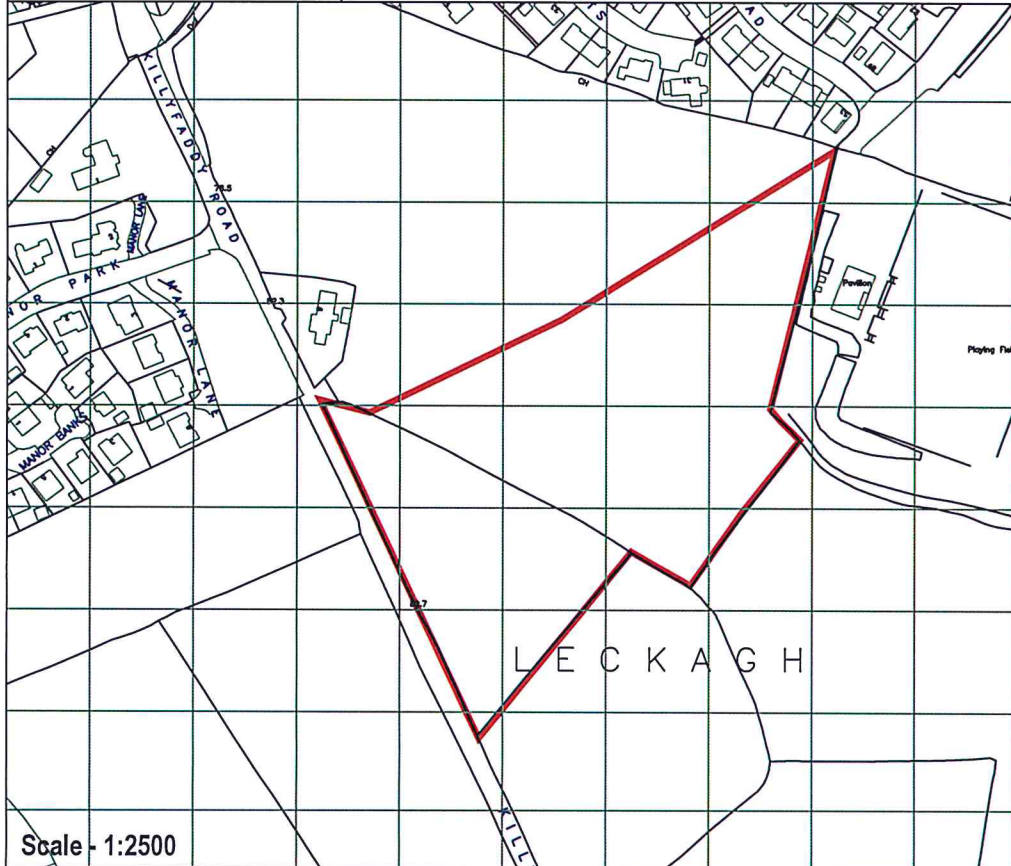
**CLOSING DATE FOR REPRESENTATIONS NO LATER THAN 5.00pm ON FRIDAY 27<sup>TH</sup> JANUARY 2017**

**ANNEX 1 – SITE CONTEXT PLAN / ENVIRONMENTAL MATRIX**



## Site Context / Environmental Matrix

Proposal	Land for Residential Use
Site area (red)	3.06 Hectares
Access	Access via Killyfaddy Road
Topography	Land falls from NE to SW
Boundaries	Hedgerow boundaries to perimeter
WWTW's capacity	Available
Potential Yield	3.06 Hectares x 20 units per Hectare = 61 units

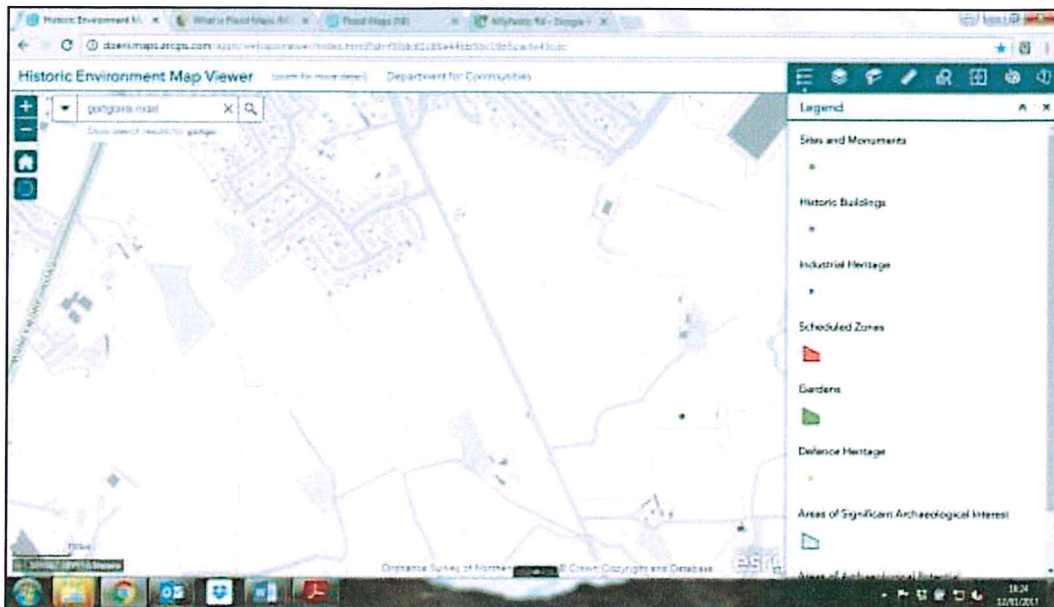


### Lands at Killyfaddy Road, Magherafelt Development Plan Representation Map

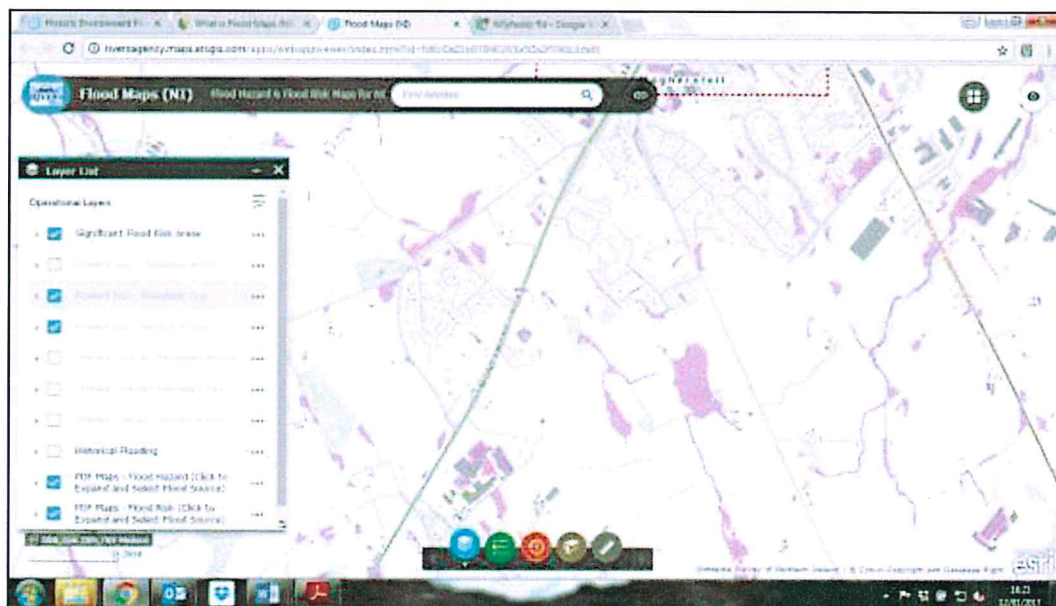
**VISION**  
DESIGN | ARCHITECTURE

31 Rainey Street  
Magherafelt  
N. Ireland  
BT45 5DA  
visiondesign.org.uk  
tel: 028 7930 0866

## ANNEX 2 – MAP VIEWER EXTRACTS (BUILT HERITAGE AND FLOOD RISK)



- There is no built heritage on site.



- The site is not affected by flooding/high levels of surface water.