

Roisin McAllister

From: Paul McMonagle [REDACTED]
Sent: 23 September 2020 12:33
To: DevelopmentPlan@midulstercouncil.org
Cc: Brian Kelly; Sara Tinsley
Subject: MUDPS/133 - DPS Re-Consultation
Attachments: LDP-Reconsultation-On-Local-Development-Plan-2030-Draft-Plan-Strategy (1).pdf;
Acknowledgement letter- Mid Ulster DC

Dear Sinead,

I am writing with respect to the Council's re-consultation of its Local Development Plan 2030 - Draft Plan Strategy.

Noting that the re-consultation process is due to Council identifying '*...a procedural error in relation to the original consultation...*' as per the Councils Re-Consultation Notice (attached) and not as a result of any 'focused' or material changes to the content of the Draft Plan Strategy, and as requested, we would like to confirm reliance on the original submission on behalf of Capper Trading Ltd, i.e. MUDPS/133.

We have attached a copy of Council's previous acknowledgment of the original submission, for completeness.

Can you please confirm that this email is also acknowledged by way of return.

Kind regards,
Paul

Paul McMonagle
Senior Planner

Turley

37 Clarendon Street
Derry BT48 7EG

[REDACTED]

All Turley teams are now [remote working](#) wherever possible in line with Government guidance.

Our co-owners are contactable in the usual ways and we suggest using mobile numbers in the first instance. We are doing all we can to maintain client service during this challenging time.

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Elaine Mullin

From: Paul McMonagle <[REDACTED]>
Sent: 19 April 2019 11:40
To: DevelopmentPlan@midulstercouncil.org
Cc: Brian Kelly; Sara Tinsley
Subject: Rep to MUDC DPS obo Capper Trading Ltd (Tamnamore)
Attachments: Rep to MUDC DPS obo Capper Trading Ltd (Tamnamore).pdf; MUDC DPS Representation Form - Capper Trading Ltd (Tamnamore).pdf

Dear Sir/ Madam,

Please find attached a representation to the Mid Ulster District Council's Draft Plan Strategy on behalf of Capper Trading Ltd and a duly completed Draft Plan Strategy Representation form.

We would be grateful if you could acknowledge receipt of this representation by return of email.

Should you have any queries please do not hesitate to contact us.

Kind regards,

Paul

Paul McMonagle
Senior Planner

Turley

37 Clarendon Street
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18 April 2019

Delivered by email

Dr Chris Boomer
Mid Ulster District Council Planning Service
Ballyronan Road
Magherafelt
BT45 6EN

Dear Dr Boomer,

**RESPONSE TO CONSULTATION ON MID ULSTER DRAFT PLAN STRATEGY
CAPPER TRADING LTD (LAND AT TAMNAMORE)**

This representation is submitted on behalf of Capper Trading Ltd (hereafter referred to as 'CTL') in response to the publication of, and formal consultation on, the Mid Ulster District Council Draft Plan Strategy (dPS) and in connection with lands at Tamnamore, north of the M1 Motorway (see **Appendix 1**).

Our client welcomes the publication of the dPS and the progress that the Council is making towards adopting a Local Development Plan (LDP) for the area and the opportunity to return comments.

This representation seeks to emphasise the strategic and regional importance of the existing agri-food business hub at Tamnamore and respectfully requests that the Council considers designating this established business and its planned expansion as a 'Rural Industrial Policy Area'. It follows a previous representation to the Preferred Options Paper stage dated 27 January 2017 which is reproduced at **Appendix 2** for completeness (Council Ref MUPOP/313).

Background

CTL has been at the heart of the agri-industry, and rural community, for more than 40 years. The company commands an annual turnover of up to £20m and employs over 120 staff at its existing premises at 124 Tamnamore Road. CTL is trusted and depended on by businesses and farmers, both large and small.

CTL's existing base in Tamnamore is a key factor in the success of the business, providing a strategic location on the highway network from where it can extend its reach to existing and future markets. CTL's operations are of regional importance for the agri-food industry and this is demonstrated throughout the remainder of this representation.

The company has an ambition to continue a tradition of stewardship, innovation and growth and to continue its commitment as a local employer, focused on the quality of its services and products. Thus, in response to increasing local and international demand, CTL is seeking to grow its established agri-business hub with a planned expansion in close proximity to its existing base.

On 14 September 2018, an outline planning application (Planning Ref: LA09/2018/1213/O) was submitted by CTL to the Council for an *'Agri Development Hub circa 22,000 sqm to facilitate processing of straw (pelletisation) and animal feeds, research and development facility and agri-business/logistics centre, associated access, parking,*

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landscaping and environmental enhancement works' (see **Appendix 3** for the location and extent of the planned expansion).

This dual trading and development hub at Tamnamore will create jobs at a new logistics centre and product development facility at a hub, anchored to the existing CTL facility which benefits from accessibility to the M1 carriageway.

Support for CTL's proposals can be found in the Northern Ireland Programme for Government (PfG) and in turn 'Going for Growth - A Strategic Action Plan in Support of the Northern Ireland Agri-Food Industry' (GfG).

Indeed, the significant economic benefits associated with these expansion proposals are demonstrated in the Economic Benefits Summary Statement, which was submitted in support of the planning application proposals and is reproduced at **Appendix 4**.

At the time of writing this representation the planning application is still under consideration.

Draft Plan Strategy Vision and Objectives

The dPS under Section 3 entitled 'Local Development Plan, Vision and Objectives' asserts the importance of the agri-food business as it states '*Within that context we see Mid Ulster District retaining its role as a key industrial centre outside of Belfast with a strong engineering and agri-food base*' (see Para 3.3 of the dPS).

Our client is encouraged by the above and by the following Plan Objectives identified in the dPS under the theme of 'Creating Jobs and Promoting Prosperity':

- 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 (our emphasis).
- 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) (our emphasis).
- To **recognise and accommodate entrepreneurship, innovation** for large, medium and small firms by attracting new firms and **accommodating expanding businesses** (our emphasis).

Indeed, this stance appears to dovetail with the Community Plan which the dPS confirms '*...seeks to prioritise job creation, investment and the enhancement of people's skills and employability. It states that engineering, agriculture (including 'farm families' and 'agri-food') and construction **have to be driven forward***' (our emphasis).

However, it is surprising that the dPS does not recognise or refer to the 'Going for Growth - A Strategic Action Plan in Support of the Northern Ireland Agri-Food Industry', September 2015 or any subsequent updates on the actions to support the NI agri-food industry. We would encourage the Council to ensure that it reviews this document and ensure that the proposed policies of the dPS align with the objectives and actions of this plan. For this reason the plan is unsound.

POLICY ECON 2 – ECONOMIC DEVELOPMENT IN THE COUNTRYSIDE

The dPS states that '*In recognition of the **success of economic development in the countryside** in our District **and the importance of clustering** this Plan Strategy designates Rural Industrial Policy Areas (RIPA's)' (our emphasis).*

The dPS further advises that the purpose of designating RIPAs is to '*...protect and consolidate existing areas of rural industry*'.

Under the subheading 'Mid Ulster Strategy' of the Economic Policies section, the dPS states that '*Two RIPA's which are of strategic importance are designated in this Plan Strategy. They are located at Tullyvannon (Killeeshil at old A4 Ballygawley Rd) and at the site of the proposed fire safety training college at Desertcreat.*

Indeed, ECON 2 makes specific reference to these two areas and states that '*Development within Tullyvannon and Desertcreat Rural Industrial Policy Areas or a designated Rural Industrial Policy Area in the Local Policies Plan providing it accords with any uses and requirements identified in the Local Development Plan.*

The dPS seeks to limit the number of RIPAs at the dPS stage by asserting that '*Any other potential RIPA's will be brought forward in the LPP providing they meet the criteria for being designated as such. The criteria for designation as a RIPA is set out in the Growth Strategy.*

Nevertheless, noting the regional importance of CTL's existing and proposed operations and that the dPS has already willingly identified two RIPAs, our client considers that the identification/designation of the lands at Tamnamore as a 'RIPA' is essential to ensuring the soundness of the dPS. The background evidence paper 'Rural Industrial Policy Areas' does not provide a robust assessment of the suggested RIPA's, namely Tamnamore and why this has been discounted.

In addition, we note that the POP identified Tamnamore as an area '*...considered to be candidates for Rural Industrial Policy Areas*' (see pg. 59 of the POP). Our previous representation to the POP stage requested that the expansion lands be included within the RIPA for Tamnamore and that the POP did not specifically mention RIPAs at Tullyvannon or Desertcreat which are now proposed within the dPS document.

Furthermore, we note the broad fit of the subject lands with the criteria for designation as a RIPA which are listed in Section 4.37 of the dPS as follows:

- it is located in the rural area i.e. outside of any settlement limits as designated in the Plan;
- no part of the proposed RIPA site should include or be in close proximity to any environmental designation such as a RAMSAR, SPA, SAC, ASSI or SLNCI;
- it will have an established or accepted industrial use and / or related use such as research and development. The use and all buildings must either have the benefit of planning permission or be immune from enforcement action under Article 132 of the Planning Act (Northern Ireland) 2011;
- the use must not have ceased or decreased to a level which means it is no longer an economically viable activity;
- have the benefit of an existing access which would be capable of serving the existing industrial activity as well as accommodating additional activity if the site were to expand;
- be in close proximity to a main transport corridor;
- be of a size and scale which means that the character of the immediate surrounding area has been altered to an extent where it could no longer be described as having a distinctly rural character; and
- consolidation of existing industry at the site would not lead to any harmful impacts being caused to nearby residential amenity.

Finally, the rationale for designating the subject lands as a RIPA is also supported by the following points:

- (a) innovation and investment at CTL has a multiplier effect – enhanced efficiency of this agri-logistics business and the quality of CTL manufactured products will support growth of the NI agri-food industry (and the reverse applies), underinvestment at CTL will impact/inhibit the regional agri-food industry – the GfG states that *‘every job created in food processing, generates another two jobs elsewhere in the regional economy’*, the GfG further states that *‘greater weight should be applied to Agri-Food applications reflecting the industry’s strategic importance’* (p.41);
- (b) In an increasingly global economy, ‘Food Security’ is a priority - this *‘encompasses the need to develop a robust supply chain capable of supplying adequate amounts of safe, affordable, authentic and good quality food’* (see GfG, p.20) – in that regard CTL is a significant component of NI food infrastructure that sources, produces and supplies products for the Agri-food industry and thereby assists with regional food security;
- (c) Regional growth targeted for the Animal Feed sector by 2020 is to increase turnover by 54% to £1bn and achieve a 30% increase in jobs to 650 full time equivalents – CTL’s development would represent a significant component of the regional growth target to be achieved;
- (d) In 2011 the NI Animal Feed sector was said to be worth around £650m, with value added estimated to be £100m and direct employment of 500 people - CTL’s investment, based on these 2011 figures, represents an 8% increase in sectoral jobs in Northern Ireland and takes Capper to c.30% of the total sector’s jobs, making this a significant proportional increase in the sector;
- (e) Itself being an objective of the NI PfG, the GfG makes a number of recommendations for the Animal Feed sector that are directly supportive of CTL proposals, which include:
 - Feed companies must invest in developing products and staff to help support farmers in maximising the value and performance of their livestock; and
 - Government must support further R&D in the areas of nutrition for improvements in performance and health, both of animals and humans and for environmental sustainability.
- (f) CTL’s priority is to provide an efficient reliable service and a high quality product for its customers, including Thompsons and Moy Park, failure to formally realise this investment through the Local Plan will be experienced NI wide and impact growth of the agri-food industry – customers rely on continuing investment at CTL in order to realise their respective regional/national plans for enhanced product quality and growth in production;
- (g) NI’s PfG fixes the objective of achieving more balanced regional growth – CTL is supportive of this objective and where 40 jobs in Mid Ulster is proportionally more significant than in a NI metropolis, where this investment supports/sustains a rural population and local services;
- (h) CTL has secured funding to develop an innovative agri-product, the benefit of which will be experienced NI/GB/Ireland wide and beyond (with the export markets being explored) – R&D investment in the agri-food industry is a NI PfG objective, further emphasised in the GfG,;
- (i) Critical to CTL’s success is its strategic location, looking north-south, it is tied to this place and cannot readily expand elsewhere - as to compromise its strategic position would compromise the business’s potential to contribute to NI/UK economic growth and this resonates with the Council’s Community Plan commitment to provide for rural business growth and employment sites at key strategic locations.

Recommendations

Section 10(2) of the Planning Act (Northern Ireland) 2011 advises that the Council must not submit a plan to the Department unless it has complied with any relevant requirements contained in regulations and it thinks the document is ready for independent examination.

Noting the issues set out within this submission, we respectfully request Mid Ulster District Council to not submit the DPS to the Department in its current form as we have concerns about its 'soundness', particularly until the subject lands are identified/designated as a 'Rural Industrial Policy Area'.

If the subject lands are not identified as a RIPA in the emerging Plan Strategy, the dPS, in its current form, will fail the following soundness tests set out in Development Plan Practice Note 6 – Soundness, dated May 2017:

- P2. Has the council prepared its Preferred Options Paper and taken into account any representations made?
- 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?
- CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?
- CE4. The plan is reasonably flexible to enable it to deal with changing circumstances?

The identified gaps in information prejudice the entire Local Development Plan (LDP) process and the Council's ability to formulate a sound and lawful local development plan.

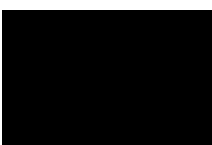
However, if Mid Ulster District Council decides to submit the DPS in its current form to the Department for Infrastructure for an independent examination, we respectfully request an opportunity to appear and be heard at the Examination in Public in accordance with Section 10(7) of the Planning Act (Northern Ireland) 2011.

The dPS acknowledges that the '*...duty of community planning requires a Council to lead the process of creating a long term vision for the social, environmental and economic wellbeing of their area and its citizens, in partnership with the community and service providers in their area*'.

Our client looks forward to engaging with the Council to secure the viable future of the identified lands and to working in partnership with the Council to help achieve the long term vision for the social, environmental and economic wellbeing of the district.

Please do not hesitate to contact us for any further information or clarification.

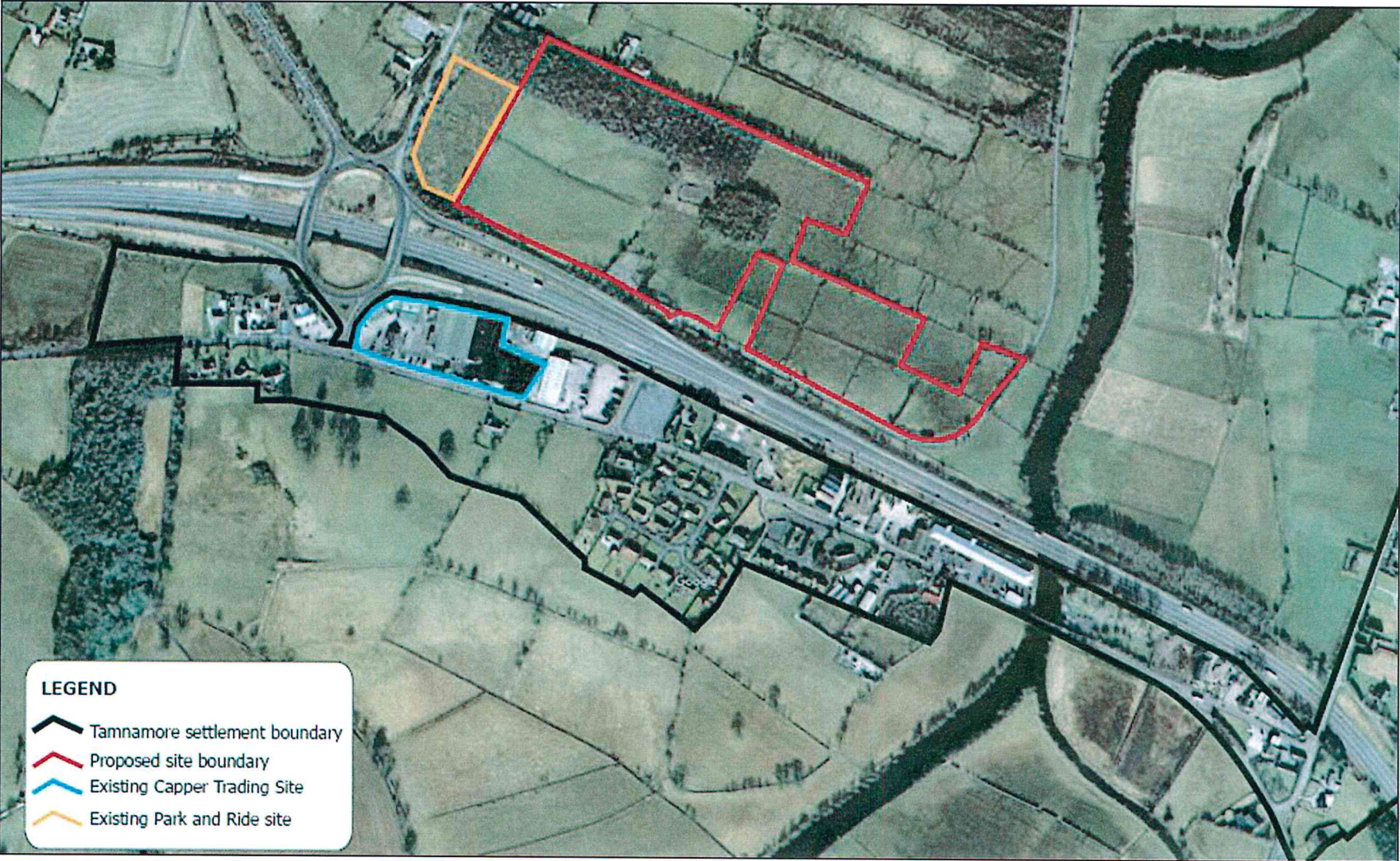
Yours sincerely



Brian Kelly
Director



Appendix 1: Capper Trading Ltd Lands



Appendix 2: Representation to the MUDC's POP

Turley

27 January 2017
Delivered by email

Dr Chris Boomer
Mid Ulster District Council Planning Service
Ballyronan Road
Magherafelt
BT45 6EN

Dear Dr Boomer

**RESPONSE TO CONSULTATION ON MID ULSTER PREFERRED OPTIONS PAPER
CAPPER TRADING LTD (LAND AT TAMNAMORE)**

I write on behalf of Capper Trading Ltd (hereafter referred to as 'Capper') in connection with lands at Tamnamore, north of the M1 Motorway. Further to the recent pre-application discussions, this agribusiness hub is earmarked for a major planned expansion – see Map 1 attached.

Local Development Plan (LDP) Representation

The lands available for these expansion proposals lie outwith the settlement limits for Tamnamore. A comprehensive planning application demonstrating the exceptional circumstances for granting approval is in preparation.

Extension of the settlement limit of Tamnamore to accommodate this investment will be advocated in parallel with the emerging Mid Ulster LDP. Timely investment in the Capper business means this client cannot wait for a compatible zoning of the land by the new LDP.

Background

Employing over 120 staff and with an annual turnover of up to £20m, Capper is growing its agribusiness both locally and internationally. Key growth areas are in the manufacturing of straw based bedding products, the milling of timber and the cooking and blending of animal feeds. There is a demonstrable need for expansion of these employment facilities to continue the firm's sustainable economic growth.

Capper's existing base at Tamnamore is a key factor in the success of the business, providing a strategic location on the highway network from where it can extend its reach to existing and future markets. Capper products can be transported efficiently to customers across the UK & Ireland and to global markets beyond.

Emerging Proposals

Comprehensive proposals are in preparation to grow the Capper business on lands north of the existing employment hub. Environmental assessment and an integrated engineering, architecture and landscape

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design will support the planning proposals which will be the subject of local community consultation. A Proposal of Application Notice is being prepared and will be submitted shortly to launch a public consultation on this major planning application.

Plan Objectives for Jobs & Prosperity

We note the draft plan objectives for jobs and prosperity and the aim of creating at least 8,500 new jobs by 2030 in various accessible locations. The plan also aims to promote diversity in the range of jobs recognising the importance of employment in the primary, secondary and tertiary sectors. It is proposed to accommodate and encourage entrepreneurship and innovation for large, medium and small firms by attracting new firms and accommodating expanding businesses.

The plan recognises the role of Mid-Ulster in performing as a driver for economic growth in the wider region. Building on the success of existing businesses can often be challenging where there are physical constraints to planned expansion. Location of workforce, accessibility to an established customer base and clustering business activity are key influencers in the decision to expand existing facilities. Proposals to expand existing facilities often demand more innovative approaches to accommodating sustainable growth, whilst ensuring environmental and planning requirements are satisfied. We commend the emerging LDP for acknowledging successful home-grown businesses but also that they should be encouraged to realise new investment ambitions. This opportunity to expand the Capper employment hub is commended in response to the call for economic development sites.

Draft Spatial Framework

Planned expansion of Capper Trading Ltd has been considered in relation to the proposed draft Spatial Framework and the Spatial Planning Guidelines (SPG) and SPG 6 in particular. It is understood that proposals for expanding the Capper employment hub can only be accommodated where the proposals support the vitality and viability of the receiving rural community without compromising the landscape or environmental quality and whilst safeguarding natural heritage. Proposals for expanding Capper must comply with the test outlined in SPG 6 to be worthy of planning approval.

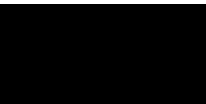
The proposed designation of Tamnamore as a Rural Industrial Policy Area (RIPA) is welcomed and reflects the imperative of protecting and growing rural industry. We recommend the RIPA boundary is drawn to include the expansion lands.

Next Steps


We see significant merit in continuing this dialogue with the LDP team and to seek to achieve compatibility with the emerging policies and zonings. We fully anticipate the LDP team will be consulted in due course with the planned proposals. It is anticipated the outline planning application will be submitted in May 2017.

Please do not hesitate to contact us for any further information or clarification.

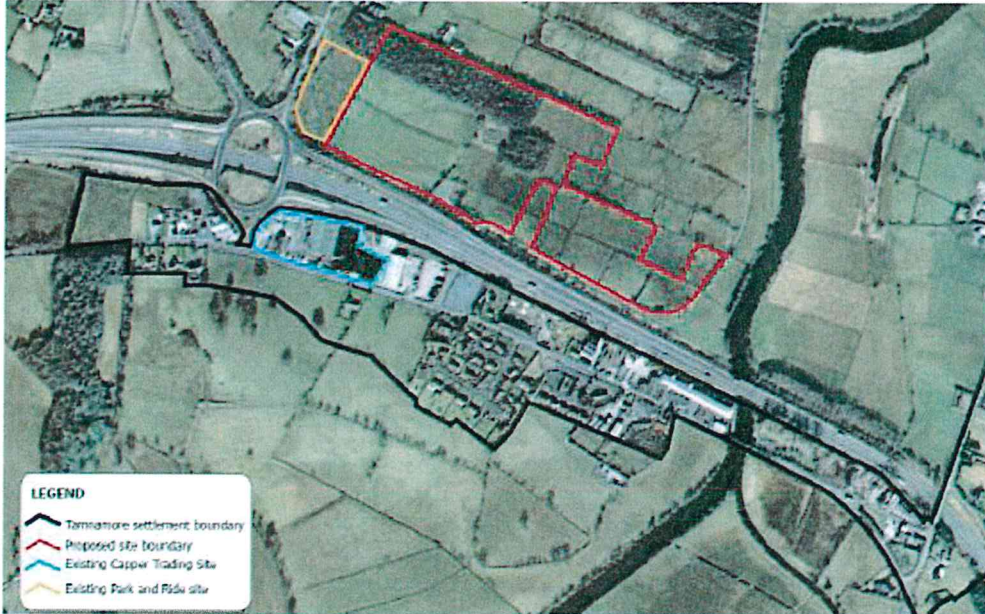
Yours sincerely



Brian Kelly
Director



MAP 1



Appendix 4: Economic Benefits Summary Statement

Economic Benefits Summary Statement

Agri-Logistics Development Hub, Tamnamore

May 2018

1. This statement summarises the economic benefits likely to be generated through the proposed development of an agri-logistics development hub in Tamnamore, at land close to Junction 14 of the M1 ('the proposed development').
2. The assessment directly incorporates estimates produced by Capper Trading to inform public consultation, but additionally estimates further economic benefits generated both locally in Mid Ulster and across Northern Ireland during construction and operation. These estimates are made through reference to best practice guidance¹ and secondary data sources.

Construction Phase

3. The proposed development will lead to a **£15 million investment** by Capper Trading in construction of the project.
4. This scale of investment could directly support approximately 110 person-years of employment in construction, based on the average turnover per employee in the Northern Ireland construction industry². This suggests that approximately **22 gross full time equivalent (FTE) temporary construction jobs** could be annually supported over five years of construction. However, employment levels are likely to fluctuate and peak, resulting in higher levels of employment during intense periods of activity.
5. The net additional employment generated can be estimated by taking into account a number of economic considerations. These include leakage of jobs taken up by people residing outside of Mid Ulster³, and displacement which could potentially occur in relation to construction labour force available to work on other developments⁴. Employment indirectly supported or induced by the proposed development can also be estimated through the application of employment multipliers⁵.
6. When allowing for these factors, it is estimated that construction of the proposed development will create **33 net additional FTE employment opportunities for residents of Northern Ireland** annually during the planned five years of construction, including the potential for **23 jobs for residents of Mid Ulster**.

¹ The fourth edition of the Homes and Communities Agency's Additionality Guide (2014) is used as the basis for calculating additionality in the absence of comparable guidance specifically produced for Northern Ireland

² Department for Business, Energy and Industrial Strategy (2017) Business population estimates

³ The 2011 Census found that 84% of people working in Mid Ulster lived in the district, and it has therefore been assumed that 16% of jobs created by the proposed development are taken by residents living elsewhere in Northern Ireland

⁴ No allowance for displacement has been made within this assessment, on the basis that approximately 115 people in Mid Ulster are claiming Jobseekers' Allowance (JSA) and seeking occupations relating to construction as of April 2018. This latent labour force is likely to minimise displacement effects

⁵ With reference to the Additionality Guide, a multiplier of 1.25 has been applied at Mid Ulster level; a regional multiplier of 1.5 has been applied across Northern Ireland

7. This increase in employment can be expected to increase economic productivity, measured in gross value added (GVA). It is estimated that a total of **£11.3 million in GVA** will be generated in the Northern Ireland economy over the construction period, of which **£8.2 million** will potentially be captured locally in Mid Ulster⁶.

Operational Phase

8. Upon completion, Capper Trading expects the proposed development to accommodate a **further 40 staff**, increasing employment levels at its existing premises by one third.
9. When allowing for the economic additionality factors described above, such an increase could provide an estimated **60 net additional employment opportunities across Northern Ireland**, including the potential for **42 jobs for residents of Mid Ulster**. This total reflects employment indirectly supported through expenditure on goods and services within the local and wider supply chain, and jobs supported by employees' expenditure in shops and on services provided locally.
10. Increased employment can also be expected to annually generate **£2.5 million in GVA** for the Northern Ireland economy, inclusive of **£1.7 million** generated locally in Mid Ulster⁷. This is a lasting effect which will persist throughout the operational lifetime of the proposed development.
11. Capper Trading currently pays circa **£83,000** each year⁸ in non-domestic rates to fund local and regional services in Northern Ireland, and this can also be expected to increase as a result of the proposed development. For illustrative purposes, if this growth were to be proportionate to the increase in the scale of its on-site employment, this would suggest that **approximately £110,000** could be paid in rates each year as a result of the proposed development⁹. This represents an increase of over **£27,000** each year above existing payments made by Capper Trading in relation to its existing premises.

Contact
Andrew Lowe

17 May 2018

CAPB3001

⁶ Based on average GVA per FTE across all sectors in Northern Ireland and in the construction sector specifically, drawn from Experian Regional Planning Quarterly forecasts (March 2018)

⁷ Based on average GVA per FTE across all sectors in Northern Ireland, and in the agriculture, forestry and fishing sector specifically. This is drawn from the latest quarterly Experian forecast

⁸ Net annual value of existing premises at 124 Tamnamore Road drawn from Land & Property Services' valuation list. Rates in 2018/19 estimated using online rates calculator

⁹ This illustratively assumes that a 33% increase in staffing levels results in a comparable scale of increase in rateable floorspace (assuming occupation at a comparable density to the expanded premises)

Economic Benefits Infographic

PROPOSED DEVELOPMENT: Agri-logistics development hub

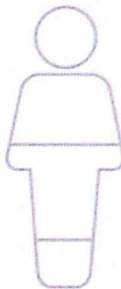
SITE: Tamnamore at land close to Junction 14 of the M1

Construction Phase



£15 million

Investment in the construction of the Proposed Development



22 gross direct

FTE (full time equivalent) jobs per annum during five years of construction

22 direct

FTE jobs per annum, including 18 in Mid Ulster

11 Indirect/induced

FTE jobs per annum, including 5 in Mid Ulster



£11.3 million

Total GVA¹ generated during construction, including £8.2 million in Mid Ulster

Operational Phase

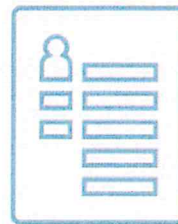


40

additional staff accommodated by proposed development

33%

increase from current employment levels



40

direct FTE jobs, including 34 for Mid Ulster residents

20

indirect/induced FTE jobs, including 8 for Mid Ulster residents



£2.5 million

GVA generated per annum, including **£1.7 million** in Mid Ulster



£110,000

rates paid annually to Northern Ireland Executive, increasing current levels by over **£27,000**

¹ GVA (Gross Value Added) measure the value of output created (i.e. turnover) net of inputs used to produce a good or service (i.e. production of outputs). It provides a key measure of economic productivity. Put simply the GVA is the total of all revenue into businesses, which is used to fund wages, profits and taxes.

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



**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

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	<input type="text" value="Mr"/>
First Name	<input type="text" value="Philip"/>
Last Name	<input type="text" value="Hill"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Capper Trading Ltd"/>

2. Agent Details (if applicable)

<input type="text" value="Mr"/>
<input type="text" value="Brian"/>
<input type="text" value="Kelly"/>
<input type="text" value="Director"/>
<input type="text" value="Turley"/>

Address Line 1	124 Tamnamore Road	37 Clarendon Street
Line 2	Dungannon	Derry~Londonderry
Line 3	Co. Tyrone	
Line 4		
Post Code	BT71 6HW	BT48 7EG
Telephone Number	028 8772 3736	028 9072 3900
E-mail Address	info@cappertrading.com	

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 _____
- (ii) Objective _____
- (iii) Growth Strategy/
Spatial Planning Framework _____
- (iv) Policy ECON 2
- (v) Proposals Map _____
- (vi) Site Location _____

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.

P2, C4, CE2 and CE4

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 enclosed representation.

(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 enclosed representation.

(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:

18 April 2019