

**Colin Mckeown**

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**From:** Gemma Jobling [REDACTED]  
**Sent:** 24 September 2020 14:47  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** MUDC Draft Plan Strategy \_For and on behalf of Creagh Concrete Products Ltd  
**Attachments:** Creagh Concrete Response 19.04.2019\_MUDC Draft Plan Strategy.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To whom this may concern,

In respect of the consultation for the Draft Plan Strategy we write on behalf of our client Creagh Concrete Products Ltd. Our client seeks to rely on their previous representation attached again hereto for ease.

We trust this will be given due consideration.

Kind regards

Gemma

**Gemma Jobling MRTPI**  
Director - Chartered Planner

**jobling** PLANNING + ENVIRONMENT LTD  
a: 1 Inverary Valley, Lame BT40 3BJ

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**Elaine Mullin**

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**From:** Gemma Jobling <[REDACTED]>  
**Sent:** 19 April 2019 14:03  
**To:** DevelopmentPlan@midulstercouncil.org  
**Cc:** Eunan Rafferty  
**Subject:** Representation to MUDC LDP Draft Plan Strategy (by Creagh Concrete Products Ltd)  
**Attachments:** Creagh Concrete Response 19.04.2019\_MUDC Draft Plan Strategy.pdf

To whom this may concern,

Please find attached submissions made on behalf of our client Creagh Concrete Products Ltd.

Please confirm receipt.

Yours sincerely

**Gemma Jobling MRTPI**  
Director - Chartered Planner

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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

MUDC LDP Draft Plan Strategy

**Representations must be submitted by 4pm on 19<sup>th</sup> April 2019 to:**

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

Or by email to [developmentplan@midulstercouncil.org](mailto: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)  Creagh Concrete Products Ltd

**2. Agent Details (if applicable)**

Mrs

Gemma

Jobling

Planning Consultant

JPE Planning Ltd

Address Line 1	Blackpark Road Creagh Toomebridge, Co. Antrim, Northern Ireland	1 Inverary Valley Larne
Line 2		
Line 3		
Line 4		
Post Code	BT41 3SL	BT40 3BJ
Telephone Number	028 7965 0500	028 2827 7736
E-mail Address		

**SECTION B**

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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 SPF 1
- (iv) Policy ECON 1 & ECON 2
- (v) Proposals Map DISTRICT MAP
- (vi) Site Location Creagh Settlement

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.

C2, CE3 & 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:

Refer to attached letter

*(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.

Refer to attached letter

*(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:

19.04.2019

Local Planning Office  
**Mid-Ulster Council Offices**  
50 Ballyronan Road  
Magherafelt  
BT45 6EN

Dear Sir/ Madam,

Date: 16<sup>th</sup> April 2019

Re: **Creagh Concrete Products Ltd- Response to Mid Ulster Council Local Development Plan 2030- Draft Plan Strategy**

Your Ref: -  
Our ref: 2017436

We write on behalf of our client, Creagh Concrete Products Limited (hereafter "Creagh Concrete") to make a submission in respect the Mid Ulster District Council ("MUDC") Local Development Plan ("LDC") Draft Plan Strategy ("DPS").

The submission considers the policies proposed within the DPS and provides Creagh Concrete's response on policies relevant to them, having regard to the necessary soundness tests referenced in the Council's document '*Guidance Notes on the Tests of Soundness and Submitting a Representation*' and Development Plan Advice Note 6.

The Council will be aware that Creagh Concrete had previously made submissions to the Preferred Options Paper ("POP"). The representations made therein remain relevant to the Draft Plan Strategy. In summary that representation sought:

- To provide diversity in the range of jobs recognising the importance of employment in the, secondary sector (industry and manufacturing) as set out in the Plan Objectives
- To reflect the important role of the Creagh site at Toombridge and Kilmascally Road site at Ardboe, and reflect this in protective land use zoning with additional lands to ease the expansion of the factory complex.
- To reflect this in the spatial framework.
- To provide positive Employment & Economic Policies to aid the growth of the precast manufacturing sector in Mid Ulster, without undue encumbrance in seeking planning consents
- To designate an Employment zone at Creagh, to connect the existing Invest NI 'Creagh Industrial Park' with Creagh Concretes manufacturing facility and surrounding employment/ industrial uses, cognisant of the proximity to the strategic route network

We do not seek to repeat the submission already made to date, but request that this information is also considered. For ease, the POP submissions are appended hereto.

As established in Creagh Concrete previous submission to the POP our clients' have a particular interest in the employment and industrial land use policies, in ensuring that is sufficient protection and provision for growth of this sector and retention and creation of jobs. Our clients welcome the commitment made in the Foreword that the Strategy aims to *the plan seeks to balance the needs of our urban centres with those of our rural communities, which require vibrant local towns and villages to meet their daily needs. The Draft Plan therefore facilitates business, employment, housing,*

community and recreational facilities in our towns, while recognising the needs of people in the countryside, providing opportunities to build a house or start a rural enterprise in a sustainable manner. However Creagh Concrete object to the following policies and submit they do not meet the tests for soundness are detailed in the following:

***Draft 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;***

This includes settlement limits for the Towns, Villages and Small Settlements. The text at Paragraph 4.4 of the DPS acknowledges the spatial framework and guidance provided by the Regional Development Strategy 2035 (RDS), which includes inter alia; *identify and consolidate the role and function of settlements within the cluster;*

At paragraph 4.8 it states;

*In allocating growth and defining settlement limits account has been taken of the existing roles and function of each settlement and the ability of the settlement to accommodate sustainable growth in terms of infrastructure, services and connectivity.*

It continues at Paragraph 4.9:

*A settlement's identity can be as much as a result of its setting within the surrounding countryside, as the quality of its buildings. Drawing a settlement limit is partly to promote and partly to contain new development within that limit and so maintain a clear distinction between the built-up area and surrounding countryside.*

However the settlement limit for Creagh, as indicated on the Map defines a small settlement limit excluding the major area of pre-existing industrial and brownfield land comprising both the Creagh Concrete's factory complex and the adjoining Creagh Industrial Park. This fails to take account of the long established setting of the village, with which Creagh Concrete manufacturing business is synonymous and ignores this established identity. It also fails to take account of the existing role of Creagh Concrete's precast business as a major employer in the village and therefore conflicts with framework objectives. To zone this as 'countryside, by virtue of exclusion from the settlement limit would fail to acknowledge the land use and shows disparity with the inclusion of other similar operations in other settlement limits across the area.

Creagh Concrete acknowledges the statement at paragraph 12.2 of the DPS that majority of economic land will not be designated until the Local Policies Plan, but regardless, the inclusion or non-inclusion of employment land within settlements is extremely relevant at this stage as this will determine which of the Economic Policies are applicable on adoption; i.e either;

- Draft 'Policy ECON 1 Economic Development In Settlements', which places a very clear presumption in favour of appropriate economic development proposals in settlements.
- Draft 'Policy ECON 2 Economic Development In The Countryside' imposes a higher bar for appropriate economic development proposals, by applying a long list of 10 no. criterion for development proposals in countryside locations.

If this industrial and employment area is excluded from the settlement limit and falling within 'countryside' it would find itself in a more disadvantaged location than other industrial and employment zoned lands. Any proposals for expansion or redevelopment would have to demonstrate compliance with the new rural policies, including draft Policy ECON 2 if adopted, which impose a higher threshold for development and would disadvantage Creagh Concrete, compared to other precast concrete businesses located within settlement limits elsewhere in the plan area.

This approach is contrary to the Plan objective set out at Paragraph 3.3 therein:



3.3 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. We also recognise the role of mineral assets and are eager that they are not just extracted from but also processed in Mid Ulster with our aggregates exported to other areas.

➤ **Soundness:**

Creagh Concrete object on the basis that this policies fails to meet Test C3 in that SPF 1 does not take account of policy and guidance issued by the department in the RDS.

Creagh Concrete object on the basis that this policies fails to meet Test CE2 in that SPF 1 Settlement Limit allocations are not realistic nor appropriate and have not considered the relevant alternatives. The exclusion of these brownfield employment lands has not been assessed and therefore it also fails to demonstrate that this SPF 1 is founded on a robust evidence base.

➤ **Remedy**

The Plan needs to be updated to reflect the existing employment areas, which form part of the identified settlement and reflect this in the prescribed settlement limits for the village of Creagh.

It should also include a modest rounding off to facility the moderate growth of this major employer during the Plan period to 2020. The suggested location map included within the POP submission Appended hereto.

**Draft Policy ECON 2 – Economic Development In The Countryside**

This Draft Policy places a considerable threshold for expansions of existing economic development enterprises, which will restrict the natural managed growth of pre-established business. In particular Creagh Concrete is concerned with Criterion e):

Expansion outside of the existing curtilage of an economic development use  
*where it has been demonstrated that relocation is not possible for operational or employment reasons and where the economic use makes a significant contribution to the local economy.*

This places an unreasonable obligation on an existing employer to demonstrate that the economic use makes a 'significant' contribution to the local economy. It is unclear whether this means the existing business already makes a significant contribution, or whether the nature of the 'proposed expansion' makes a significant contribution. If the latter interpretation was to be imposed this would place an unreasonable encumbrance on existing businesses, such as Creagh Concrete to seek minor extension of their facility for additional storage or circulation provision.

➤ **Soundness:**

Creagh Concrete object on the basis that this policies fails to meet Test C3 in that Draft Policy ECON 2 does not take account of policy and guidance issued by the department in the RDS to encourage the spread and sustenance of existing employment uses. .

Creagh Concrete object on the basis that this policies fails to meet Test CE2 in that SPF 1 Settlement Limit allocations are not realistic nor appropriate and have not considered the relevant alternatives. The exclusion of these brownfield employment lands has not been assessed and therefore it also fails to demonstrate that this SPF 1 is founded on a robust evidence base. The Council's approach is not supported by the SPPS, which support small expansions of employment uses in the countryside and must be unsound as it has not taken proper account of policy and guidance issued by the Department (C3).

Creagh Concrete also object on the basis that Draft Policy ECON 2 fails test CE4, in that it is not reasonably flexible to enable it to deal with changing circumstances. For example if changes in non-planning legislations / regulations place greater space requirements on the external storage of goods/ products or require additional processing and additional land outwith the curtilage of the site is required to facilitate this the policy is not currently sufficiently flexible to address this, as the application would be required to demonstrate both operation reasons and prove a 'significant benefit'.

➤ **Remedy**

The Plan needs to be updated to reflect the operational needs to existing employers to grow and readily respond to market demands. Creagh Concrete accepts that such growth should be controlled to protect other environmental interests, but suggest that a variation to this policy could address this by removing the latter test of the policy:

*Revised Working Criterion E) Expansion outside of the existing curtilage of an economic development use where it has been demonstrated that relocation is not possible for operational or employment reasons ~~and where the economic use makes a significant contribution to the local economy.~~*

**Draft Policy ECON 1 – Economic Development In Settlements**

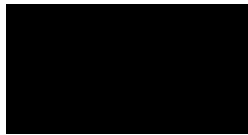
Creagh Concrete support this draft Policy, but echo the concerns raised in respect of the designation of settlement limits, and in particular the exclusion of pre-established economic employment uses that currently contribute to the setting and land use the settlement, namely Creagh.

**MODIFICATIONS TO THE DRAFT STRATEGY**

Creagh Concrete also suggest the Policy Plan Insertion, to designate the lands to the east of Creagh as an Economic Opportunity Site. If the Council and PAC decide that Economic Opportunity Site should be considered at the draft Plan Strategy stage we would request our clients' site be identified as Development Opportunity Site. This would rationalise the pre-existing areas of industrial land and economic development uses. We refer to the previous submissions made in respect of the POP in support of this proposition.

We trust this will be given due consideration, but should you require any further information please do not hesitate to contact this office.

Yours sincerely,



**Gemma Jobling BSc Dip TP MTRPI**  
**Director**  
Jobling Planning + Environment Limited

# APPENDIX 1



# **PREFERRED OPTIONS PAPER RESPONSE**

## **Creagh Concrete Products Limited**

**Response to Mid Ulster District Council Local Development Plan  
Strategy**

**CONTINUATION DOCUMENT (Section B)**

**January 2017**

## **Jobling Planning and Environment Ltd**

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## Document Control

<b>Project Reference</b>	<b>Internal</b>		<b>External</b>	
			N/A	
<b>Client</b>	Creagh Concrete Products Limited			
<b>Project Title</b>	MUDC_ POP Response			
<b>Document Title</b>	Continuation Document			
<b>Document Issue</b>	<b>Issue No.</b>	001	<b>Status</b>	DRAFT
	<b>Date</b>	27 <sup>th</sup> January 2017		
	<b>Approved By</b>	GJ		
	<b>Superseded Doc.</b>	N/A		

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## 1.0 Purpose of Document

- 1.1 This document is submitted on behalf of Creagh Concrete Products Limited (hereafter "Creagh Concrete") and provides a response to the Mid Ulster District Councils ("MUDC") Local Development Plan ("LDC") Preferred Options Paper ("POP").
- 1.2 This paper is essentially a 'Continuation Document' to Section B of the POP Questionnaire form and sets out QBS response to the POP. Accordingly, this document is intended to be read in conjunction with the POP Questionnaire.
- 1.3 Creagh Concrete is a long established industrial business, originating in 1976. Since then, Creagh Concrete has grown to become one of the largest producers of concrete products throughout Ireland and the United Kingdom. It is a major employer within the Mid Ulster District Council area and makes substantial economic contributions to the borough by virtue of employees and taxes and business rates.
- 1.4 The company has many sites across the Northern Ireland and the UK, however it has retained its head office and main manufacturing base at its site at Blackpark Road, Creagh (Toomebridge). It also has a significantly manufacturing base at its Ardboe facility at Kilmasally Road, Ardboe.
- 1.5 This representation to the MUDC area plan team in response to the POP relates to these two Creagh Concrete sites. Specifically Creagh Concrete make representation to ensure these two manufacturing and employment locations are given due recognition and protection in the area plan. Creagh Concrete respectfully request that provision is made for the nominal expansion of these facilities over the plan period and to ensure the plan policies are supportive of growing industries in the plan area.



## 2.0 Response to POP

2.1.1 Creagh Concrete welcomes the vision and strategic objectives outlined at page 14 of the POP. In particular, Creagh Concrete welcomes the Council's aspiration to *Support strong, sustainable growth for the benefit of all parts of the Region* (Bullet 1, page 14 POP) and is firmly of the view that the concrete industry can play a pertinent role in fulfilling this objective.

2.1.2 In particular, Creagh Concrete welcomes one of the principle Plan Objectives; creating jobs and promoting prosperity and the sub-objectives that seek to;

- *To facilitate the creation of at least 8,500 new jobs by 2030 at a variety of locations*
- *To provide diversity in the range of jobs 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.*

(Page 15 POP)

2.1.3 Creagh Concrete also supports policy wording within ECON 2, which acknowledges the;

- Expansion within the curtilage of an established economic development use which is of an appropriate scale and nature
- *Major industrial proposals where it is demonstrated that the proposal will make a significant contribution to the regional economy and where it is demonstrated that due to its size or site specific requirements it needs a countryside location'*

(page 60, POP)

2.1.4 Creagh Concrete welcomes ECON 2 as the policy presents a flexible approach to the zoning allocation of established industrial businesses such as Creagh Concrete at Creagh Road.

2.1.5 The Mid Ulster region has developed a strong construction and manufacturing base, with a high proportion of locally grown industries. Creagh Concrete believe this should be welcomed and reflected in the Plan's objectives by facilitating and supporting the future

growth and development of the industrial sector, particular in the construction and manufacturing arena.

- 2.1.6 Creagh Concrete is one such business. Established in 1976, Creagh Concrete has grown substantially over the last 40 years owning and operating two no. bases in the Mid Ulster Area. Of the two, the businesses main manufacturing facility is based at Creagh, Toombridge, whilst another outlet is based at Kilmascally Road, Ardboe. Creagh Concrete design, manufacture and supply a wide range of concrete products. The two no. sites offer a wide range of services including civil engineering; house building; gardening and agricultural.
- 2.1.7 In respect of promoting economic growth and facilitating the development of locally grown industries and encouraging inward investment, Creagh Concrete respectfully ask the Council to reflect the important role of the Creagh site at Toombridge and Kilmascally Road site at Ardboe, and reflect this in protective land use zoning with additional lands to ease the expansion of the factory complex.
- 2.1.8 Creagh Concrete is generally supportive of the Strategic Planning Guidelines, but would encourage the Council to consider the role the Creagh and Ardboe site can provide in meeting the plan's objectives and would suggest this is reflected in the spatial framework.

## 2.2 Lands at Blackpark Road, Creagh, Toomebridge

- 2.2.1 Creagh Concrete own lands and request these are considered for inclusion in the forthcoming area plan for the purposes of employment and industry land use.
- 2.2.2 A location of lands is detailed in Figure 1 below and Figure 2 outline the extent of the lands that are available for development.

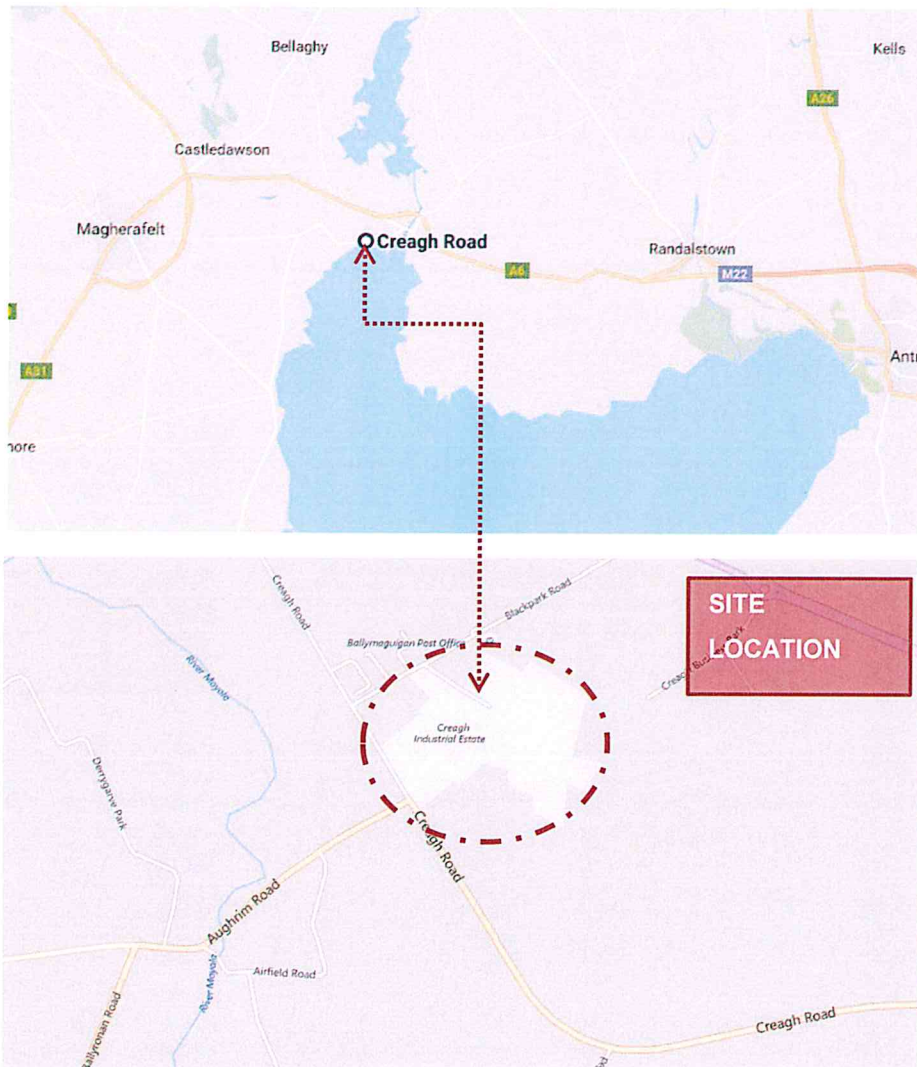
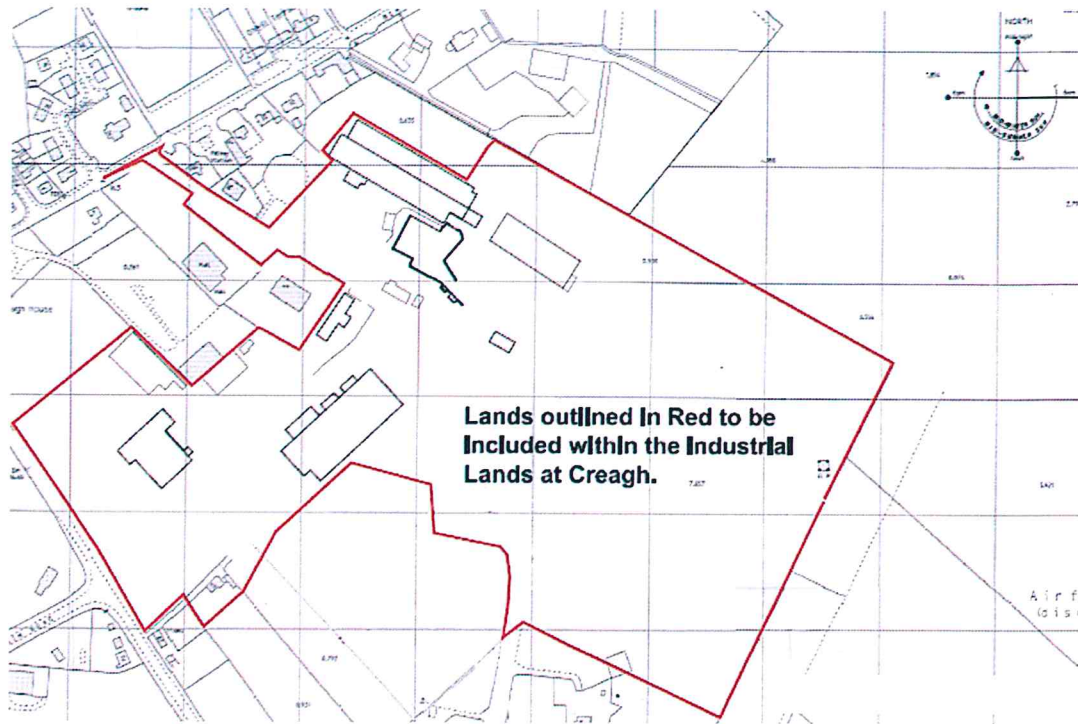


Figure 1 Creagh Site Location



**Figure 2 Creagh Concrete Lands outlined in red**

- 2.2.3 The lands owned by Creagh Concrete are outlined in red on the above image within the industrial lands at Creagh Industrial Estate.
- 2.2.4 The Creagh Road Site has been operating over 40 years and has been the focal point of Creagh Concrete's manufacturing business.
- 2.2.5 **Creagh Concrete would urge the Council to include all of the lands outlined in red within the employment land use zoning at Creagh.** Currently only the western half of the lands are included within the industrial zoning in the Magherafelt Area Plan 2015. This compromises the ability of the business to expand in response to market demands. Owing to the business's long standing in the Mid Ulster region and its high level of employment and economic contribution, Creagh Concrete respectfully submit that this ought to be reflected through a wider land use designation to protect its future growth.
- 2.2.6 The following section details the suitability of this land and in particular highlights its proximity to the Creagh Industrial Park to the north of the subject lands.

### Central Location

- 2.2.7 The site occupies a central location on the western edge of County Antrim and close to County Londonderry. The site is situated a short distance from main A6 road which connects to Derry to Belfast. It is less than 10 miles from the arterial M2 motorway to Belfast. As a result the site occupies a strong strategic location with access to the whole of the region and within a reasonable commute of the main ports at Larne and Belfast
- 2.2.8 In terms of accessibility, the road connection is planned to Creagh Concrete through this area. There is an ideal opportunity to develop the site as the area has strong transport links.

### Brownfield Lands

- 2.2.9 The site has a long established history of development, having been used as air field in the first quarter of the twentieth century. Since then the area has been subject to a range of industrial land uses.
- 2.2.10 The subject site has an extensive planning history as seen below in Table 1;

**Table 1: Planning History**

Planning Reference	Description	Status
H/2005/1118/F	Change of Use from Agricultural Field to extension of storage yard & lorry park.	Granted
H/2005/0739/F H/2006/0279/F 2006/A1954	1 No. Building for storage of items necessary for existing factory production. 1 No. Building for the tying and cutting of reinforcement bars used in factory products.	Granted Outline Permission
H/2007/0546/F  LA09/2016/1316/DC	Removal of existing metal single skin and roof cladding on existing concrete products factory, and replacement with new insulated metal cladding.  Extension of existing concrete products factory to encompass storage yard. Demolition of existing single skin corrugated tin factory and replacement with new factory building.	Granted - Extant
H/2013/0296/F	Reinstatement and extension of previously approved storage area, lorry and trailer park to facilitate reorganisation of precast products and increased variety of stock products, colour and size with no increase in existing site production area. Relocation of	Live planning application

	existing external block and brick production area (5200m <sup>2</sup> ) to proposed new area (4320m <sup>2</sup> ) with original being reused for product display, product finishing, product and plant storage, vehicle storage and recyclable material waste and storage. Retention of existing product display, product finishing, product and plant storage, vehicle storage and recyclable material waste storage.	
LA09/2015/1239	Variation of condition 6 of previous approval H/2007/0546/F to vary the hours of operation to Mon-Fri 5:00am - 10:00pm and Sat 5:00am - 3:00pm.	Under consideration
LA09/2016/0692/F	Erection of new building for washing/ drying of precast concrete products (retrospective). Erection of new gantry crane for loading /unloading of precast concrete products. Extension of existing production factory TF5 to facilitate to production of larger precast concrete units.	Live planning application
LA09/2016/1090/F	New Access into Creagh Concrete Products Ltd site from Creagh Industrial park (off Hillhead Road) including the construction of a 24m length extension of the Creagh Industrial park road leading to an internal roadway within the Creagh Concrete Products site.	Live planning application

2.2.11 As detailed in Table 1, the Creagh Site has had an active planning history. Creagh Concrete have made a long-term contribution to the area through extensive industrial development.

2.2.12 The site is also based on a former Airdrome; a previous industrial land use.

2.2.13 The zoning of these lands would constitute the re-use of formally occupied lands and so would ease development pressure on greenfield sites within the Mid Ulster Council area.

## Existing and Proposed Industrial Land Uses

- 2.2.14 As detailed in Table 1, the Creagh site area is actively being used by Creagh Concrete for industrial purposes through their long standing concrete business. The company proposes to expand this industrial activity as seen through planning application LA09/2016/0692/F. The erection of a new building for washing/ drying of precast concrete products (retrospective), erection of new gantry crane for loading /unloading of precast concrete products, and extension of existing production factory TF5 to facilitate to production of larger precast concrete units demonstrates the businesses long term commitment and contribution to the site area.
- 2.2.15 The current siting of Creagh Concrete is ideally positioned; not only in terms of transportation, but also because of its distance from residential zoning in Creagh. The site is situated in proximity to other industrial land use zone areas, such as the Creagh Industrial Park.
- 2.2.16 Creagh Concrete propose to improve connectivity with other industrial sites such as Creagh Industrial Park as seen with their live application LA09/2016/1090/F. This application details Creagh Concrete's proposal to create a new access into site from Invest NI lands at Creagh Industrial park (off Hillhead Road) including the construction of a 24m length extension of the Creagh Industrial park road leading to an internal roadway within the Creagh Concrete Products site. This application would improve connections between currently zoned industrial land with the Creagh Concrete site (as seen in Magherafelt Area Plan 2015, Map. 4 attached to this document).
- 2.2.17 The lands surrounding the Creagh Concrete facility are subject to a range of industrial land uses, including an anaerobic digester, recycling facility and a range of manufacturing businesses. Importantly the site adjoins the Invest NI Creagh Business Park which recognised the suitability of this area for industry. The expansion of the Creagh Concrete industrial land use zoning is compatible with these adjoining lands uses and reflective of the over-arching character of development in the area.

### Former Area Plan (2005)

2.2.18 The former Area Plan representation in 2005 made detailed reference to the general Creagh area and its suitability for industrial land uses. Reasons included;

- The lands are located between an area of existing industry.
- There has been recently approved industrial access on the lands to the north east, which was granted approval under 2006/A1137 approved access, and therefore pose most logical expansion to the Creagh Business Park for non-invest NI clients.
- The site does not merit environmental protection, nor does it compromise any landscape features.
- The site comprises of flat topography and easily developed.
- It observes a reasonable set back from the public road.
- It reads with the existing area of industry and therefore will be in character with the area.
- Additional provision should be included in the lands at Creagh as they comprise the most logical extension to the approved industrial site.
- The location takes account of the proposed motorway extension and would be logical location for a major industrial site within the District.

2.2.19 Considering the foregoing, Creagh Concrete would encourage the Council to include a designation to protect this long established industrial use. Creagh Concrete would urge the Council to include all of the lands outlined in red in Figure 1 and thereby extending the area currently designated within the extant Area Plan.



## 2.3 Lands at Kilmascally Road, Ardboe

- 2.3.1 Creagh Concrete also own lands within part of the former airdrome at Ardboe and request these are retained within the forthcoming area plan for the purposes of employment and industry land use.
- 2.3.2 The location of lands at the Ardboe site is detailed in figures 3 and 4 subsequently, and outlines the extent of the lands available for development.

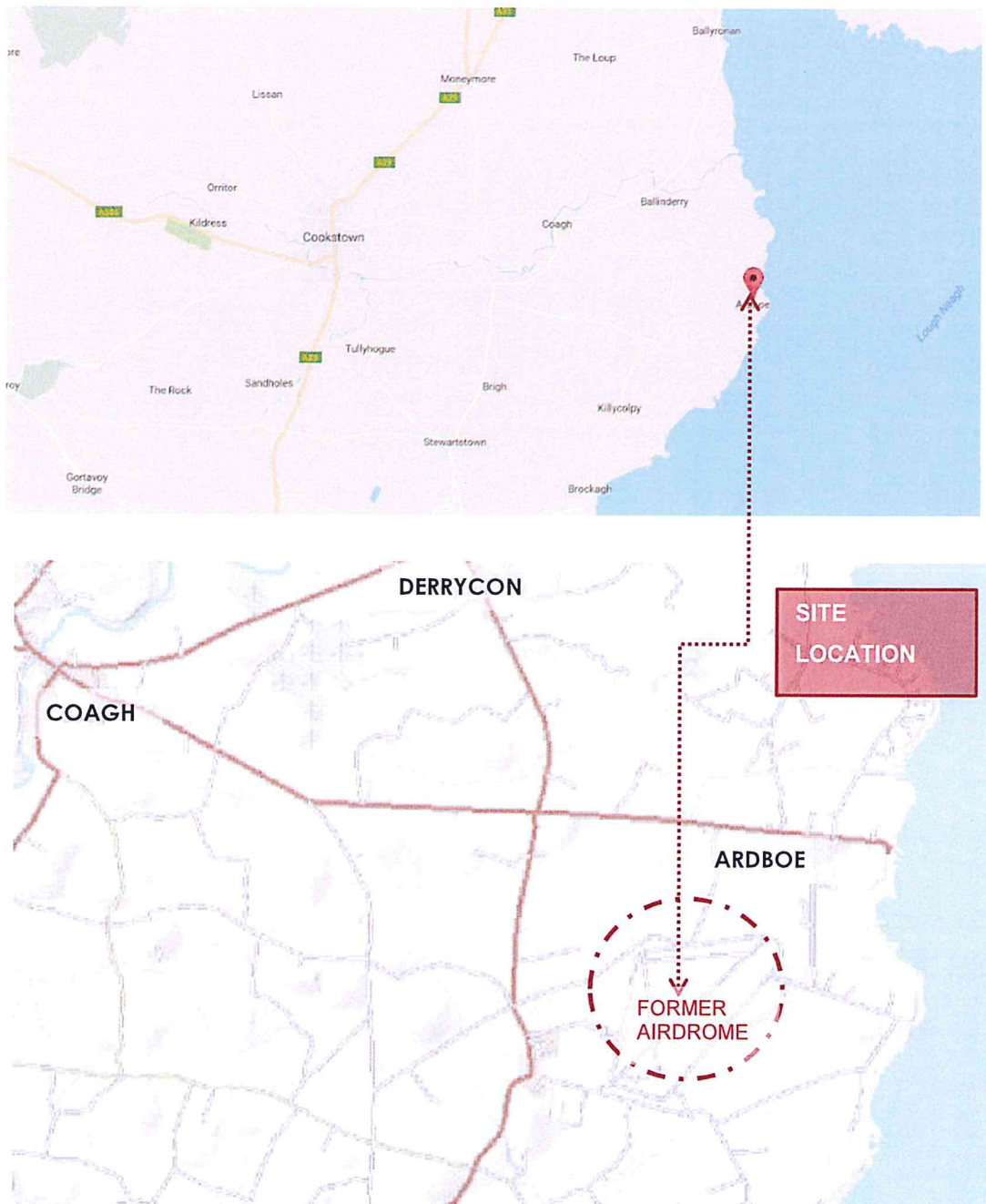


Figure 3 Ardboe Site Location



**Figure 4 Creagh Concrete lands outlined in red**

- 2.3.3 The lands owned by Creagh Concrete are outlined in red on the above image. Existing land uses are also marked on, with Creagh Concrete business annotated in black and third party operations in grey.
- 2.3.4 Creagh Concrete would encourage the Council to include a designation in the former airdrome to protect these long established industrial land uses.

## **2.4 Summary**

- 2.4.1 Considering the foregoing, Creagh Concrete would encourage the inclusion of positive plan policies that recognise the important role the lands at Creagh can play in supporting strong economic growth for the region and in facilitating the strategic plan objectives.
- 2.4.2 Creagh Concrete would also seek to see the lands at Kilmascally Road, Ardboe protected.
- 2.4.3 It is considered that these areas are well placed to provide a strategic location for the growth of research and development industries and construction/ manufacturing land uses.
- 2.4.4 In addition to retaining these lands within an industrial land use zoning, Creagh Concrete would encourage the Council to extend this zoning to include the lands outlined in red on Figure 2 and on the attached location map to enable the expansion of this area as a central employment hub to service the west of the region. This is considered beneficial to the entire district by providing a key employment area for attracting inward investment from large scale industries.
- 2.4.5 Creagh Concrete is the principle land owner and the company's willingness to develop the lands at Creagh would act as a catalyst to establishing this area as a key employment hub. Creagh Concrete have a proven track record of investing in this area and would encourage the Council to building upon this foundation and zone additional lands, combined with positive plan policies to develop the Creagh Business Park.