

ARCHITECTS

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Your Ref.

JM/2228/021

22/09/20

FOR THE ATTENTION OF

Mid Ulster District Council
Planning Department
Local Development Plan Team
50 Ballyronan Road
Magherafelt
BT45 6EN

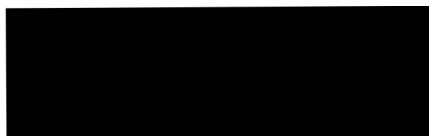
Dear Sir/Madam,

RE GRANVILLE INDUSTRIAL ESTATE

Please find enclosed an objection to the Local Development Plan – Draft Plan Strategy.

We would be grateful if you could consider this objection and look forward to hearing from you in due course.

Yours sincerely,



CLARMAN & CO

Encs



CLARMAN ARCHITECTS PLANNERS

Objection to MUDC - Local Development Plan 2030 – Draft Plan Strategy

Having reviewed the Local Development Plan 2030 – Draft Plan Strategy, we wish to advise you of our objections to lands currently proposed to be zoned as industrial. These lands are located to the west and north of the existing Granville Industrial estate and west and northwest of the Dungannon Business Park. They are referenced within the Draft Plan Strategy as follows;

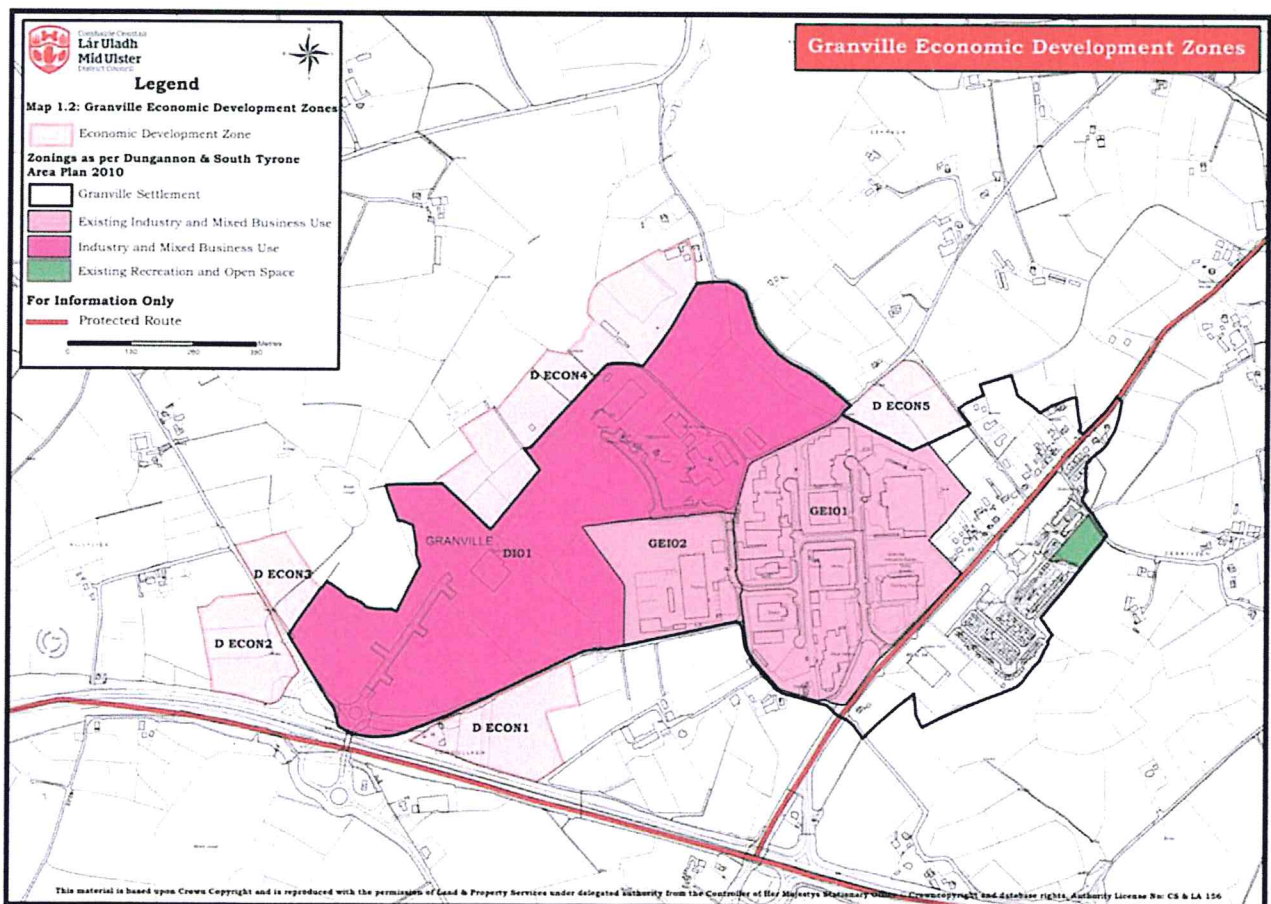
- Zone D ECON 4 – Land to North West of Dungannon Industrial Park Zone
- D ECON 5 – Land at Eskragh Road, Dungannon

It is proposed to extend the provision of the industrial land at Granville Industrial Estate and Dungannon Business Park in five separate locations.

We have calculated the area of each zoned plot as specific land areas were not provided.

The Draft Plan Strategy has identified them as follows.

- D ECON 1 - Area 4.153 Hectares
- D ECON 2 - Area 3.320 Hectares
- D ECON 3 - Area 1.872 Hectares
- D ECON 4 - Area 9.088 Hectares
- D ECON 5 - Area 2.613 Hectares



Extract from the Local Development Plan 2030 Draft Plan

This proposal is to provide additional industrial zoning of 21.016 Hectares at the above location. There is currently 8.053 Hectares of zoned industrial lands which have not been developed over the lifetime of the current Area Plan. This proposal, if adopted, would increase the existing Granville Industrial Estate and Dungannon Business Park (effectively one estate with two entrances) from 57.115 Hectares to 86.184 Hectares. This is an increase of 50.8% of industrial lands which the Draft Plan proposes to site within the small community of Eskragh Road and Granville. The proposal would simply dwarf the local community and forever change its character and the lives of those living there.

The additional road traffic, noise pollution, odour pollution, littering and general criminality that this proposal would generate would result in a significant negative impact on the quality of life for the local community.

There are currently investigations ongoing by a dedicated NIEA Team to ascertain the already high levels of noise pollution and odour pollution within the Granville Industrial Estate. Noise and odour pollution are impacting on the quality of life for residents living as far away as 0.75 kilometres from the existing plants. Concerns over air quality levels have still to be clarified. Odour/ air quality is already a major issue for not only the community but also those businesses located within the Granville Industrial Estate. Any expansion of the existing odour producing operations will also have a negative impact on the decision making of any non-by-product manufacturing business to locate at Granville.

Historical planning decisions have permitted the proliferation of food processing factories, slaughter houses, rendering factories, peat processing plants and anaerobic digesting plants within the Granville Industrial Estate. All these operations fall under the control of the NIEA and as such Mid Ulster District Council have no authority to control/influence or enforce against operations when problems regularly arise.

The Local Development Plan 2030 – Draft Plan Strategy identifies only two locations for zoned lands within the entire Dungannon Area, Granville (D Econ 1-5) and lands on the Cookstown Road (D Econ 7). Land identified as D Econ 6 is already either industrial lands or lands with the benefit of planning permission, for industrial development.

All other remaining zoned industrial lands within the current Area Plan have been omitted. This informs us that the Area Plan Team propose to place 88.05 % of all the newly zoned lands for the Dungannon area with a single location, that being Granville.

Dungannon Business Park and Granville Industrial Estate are controlled by Invest NI. As the majority of those proposed Industrial zoned lands will be accessed via the existing Dungannon Business Park and Granville Industrial Estate, little opportunity remains for businesses not involved/ subscribed to the Invest NI schemes.

The Local Development Plan 2030 – Draft Plan Strategy has simply considered Granville as the Dungannon area's industrial hub. The Draft Plan fails to adequately consider other suitable sites, especially locally situated lands to serve the large existing International industrial manufacturing bases at Edendork, Farlough Road Dungannon and Coalisland.

Any development extension to these businesses will now require the moving of heavy plant through the districts road system, if they decide to remain in the Mid Ulster District.

Observations of two of the Zones Areas within Granville

Zone D ECON 4 – Land to North West of Dungannon Industrial Park

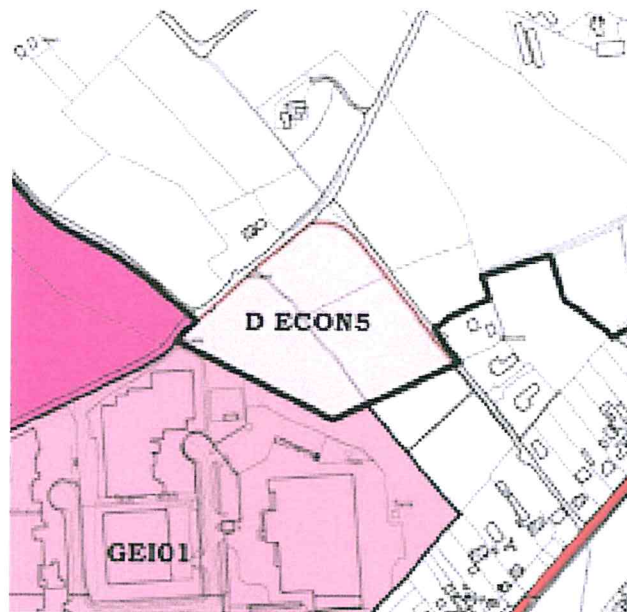
- Vehicular access should be from Dungannon Industrial Park;
- An archaeological assessment and evaluation should be provided;
- An area of fen habitat exists within the north-eastern part of the site and an ecological survey of the northern sector of the zone should be submitted to determine the extent to which development should be set back from this area;
- If the existing dwelling within the southern part of this zone is to remain in residential use special attention should be given to development adjacent to it in order not to affect its residential amenity;
- The site will require a Concept Masterplan providing for:
 - a 10m metre buffer planting zone of trees of native species along the north-eastern and southwestern boundaries;
 - retention of the two watercourses within the site and provision of an adequate ecological buffer alongside them;
 - provision for sewage, drainage, including surface water flooding, and appropriate access, cycle and walkways.

Access to all of the lands cannot be achieved via Dungannon Industrial Park (known as Dungannon Business Park). An assessment of the site clearly indicates that a substantial portion of the lands would have to be accessed via the existing Granville Industrial Estate. This junction does not currently have adequate access onto the Granville Road. On-street parking within the estate reduces the site road to a single carriageway width for 50% of its length. As such it is not suitable to take any intensification in both HGV and car traffic.

The proposed 10m buffer zone is inadequate to address over-looking/screening, noise pollution and odour pollution issues.

There is no sewerage treatment provision to deal with this extended industrial zoning which the Planning Team would be aware of if they consulted with NI Water.

Zone D ECON 5 – Land at Eskragh Road



Extract from the Draft Plan

- Vehicular access should be from Granville Industrial Estate;
- A 10m metre buffer planting zone of trees of native species along the north-eastern, north-western and south-eastern boundaries;
- Provision for sewage, drainage, including surface water flooding, and appropriate access, cycle and walkways.

These lands currently create a buffer between the existing Industrial Estate and its surrounding residential lands. As it stands, the separating distance within this existing buffer zone is insufficient to reduce/stop noise and odour pollution from the adjoining factory reaching the properties. To suggest reducing this distance to a mere 10m is not acceptable and if the Planning Team consulted with Environmental Health and the NIEA they would be fully aware of this fact.

Permission has been granted over a number of years for food-producing factories, animal slaughter areas, rendering plants, anaerobic digestors and fertilizer factories, all within a few hundred metres of existing residential properties. To propose zoning lands which can only be accessed through the Dunbia Plant, clearly suggests the lack of understanding of the very real issues being experienced by the local residents.

The subject lands as proposed to be zoned, can only be accessed via one factory within Granville as the surrounding Eskragh Road and Sandy Lane road network are minor in nature and incapable of taking additional traffic.

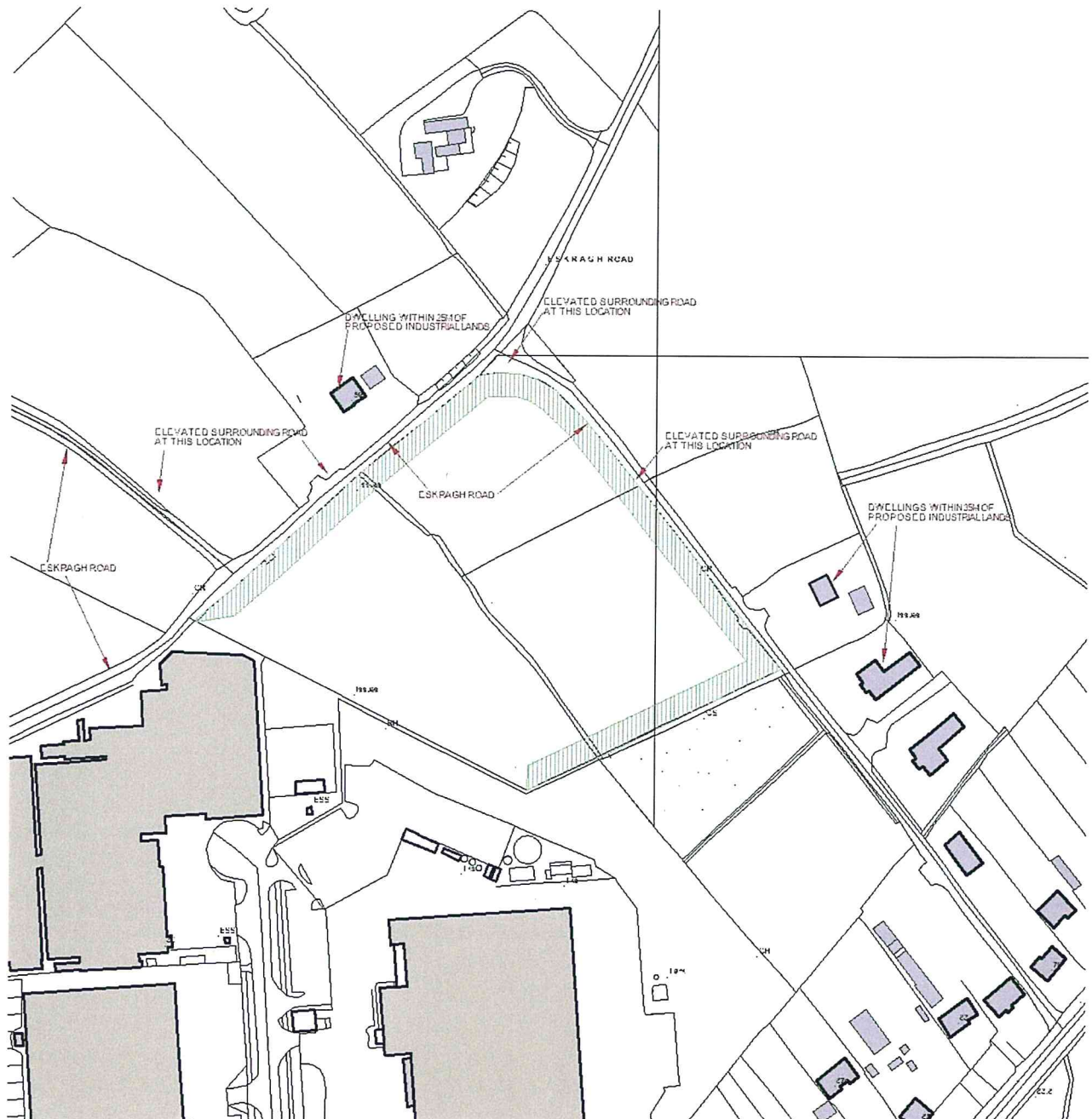
Any suggested extension of Granville Industrial estate to the northern boundary will have the potential to create additional traffic hazards on Granville road. As stated, this access from the Granville Road to this large industrial estate is inadequate.

Mid Ulster District Council Local Development Plan Objection.

The lack of on-site car parking within the estate forces the existing workforce to park on the road verge which has the impact of significantly reducing the width of the internal road network.

There is no sewerage treatment provision to deal with this extended industrial zoning which the Planning Team would be aware of if they consulted with NI Water.

The proposed buffer zone of 10m width would result in the industrial development lands being within 30m of the residential properties. The surrounding road network and residential properties are elevated in relation to the subject lands.



Map indicating proximity to adjacent residential properties



*Eskragh Road/ Sandy Lane Junction.
Distance views of Large Refrigerated Buildings*

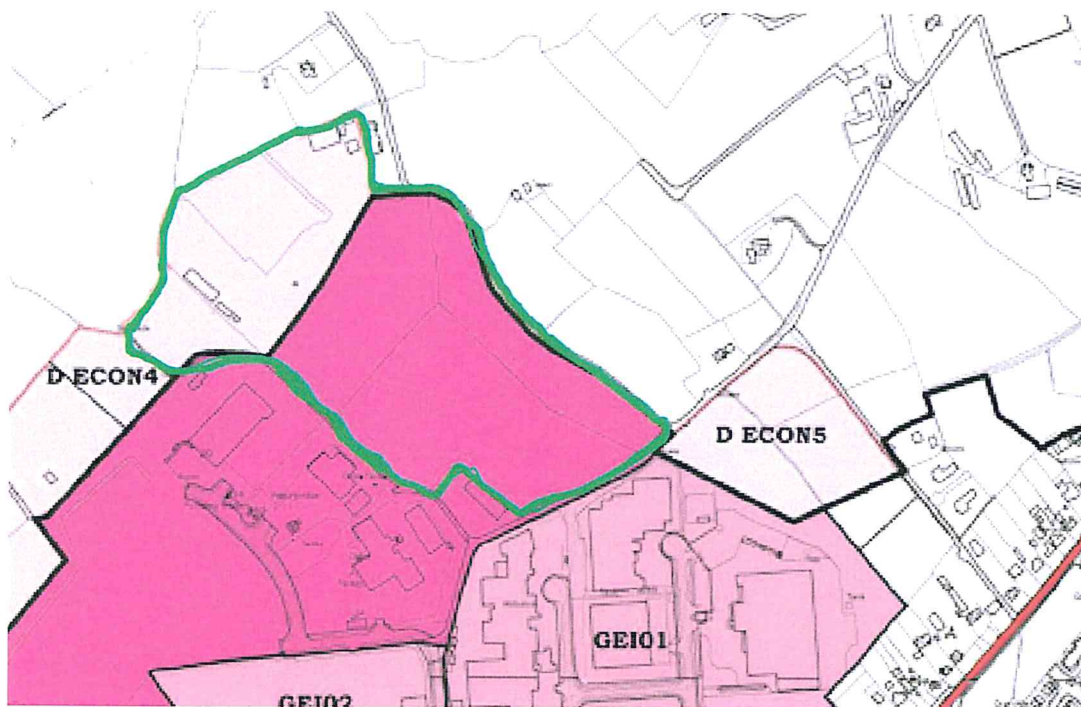


Elevated view down onto proposed zoned lands

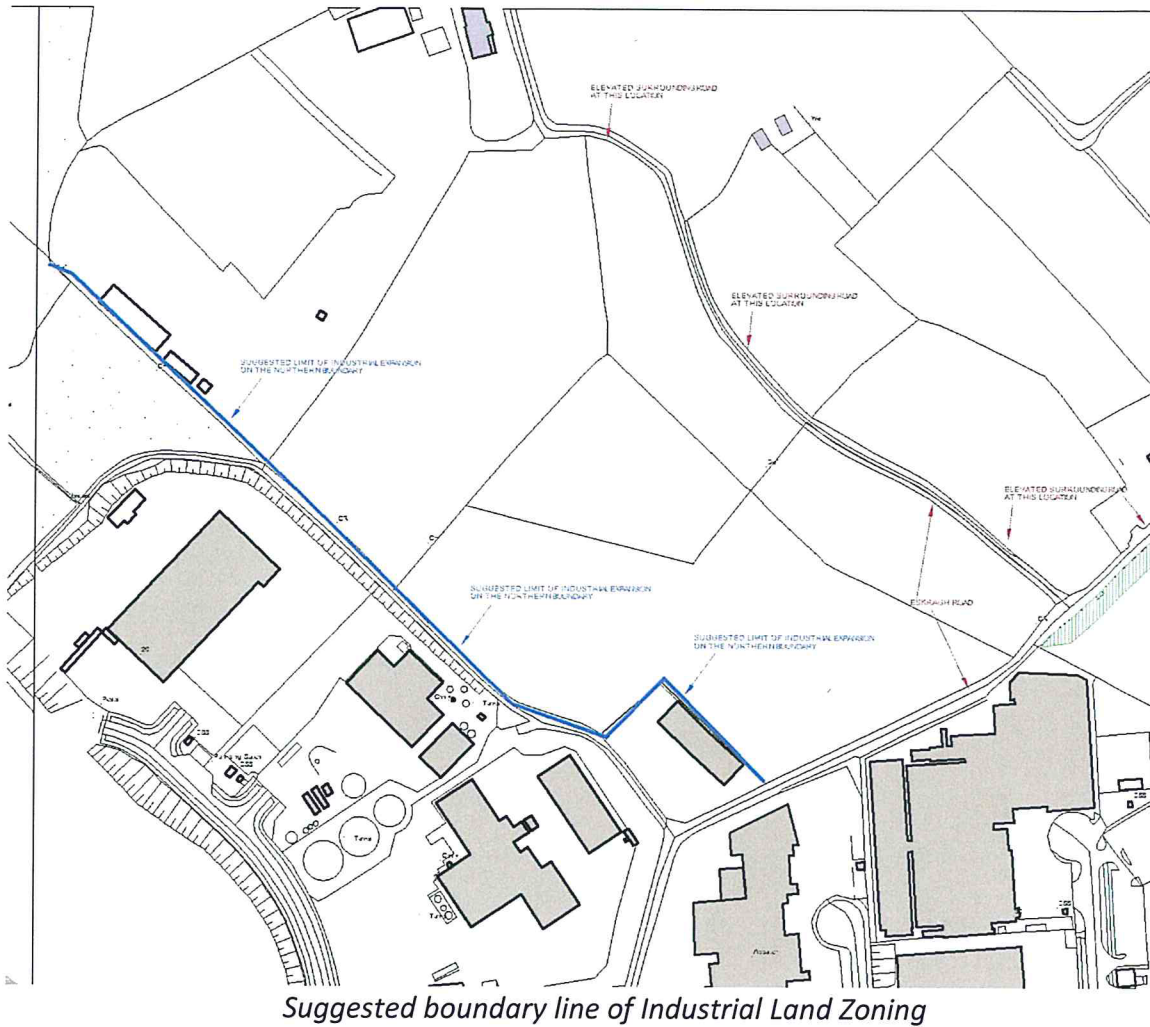


Sandy Lane with proposed industrial lands to the right.

We would further advise that the existing industrial zoned lands to the north of the Granville Industrial Estate should be removed under this plan assessment. The Local Development Plan 2030 – Draft Plan Strategy acknowledges that *“It is important to note the access issues present in the Granville industrial estate. A 7.91ha portion of land zoned for the industry to the north of Granville has access difficulties and therefore it could be argued that the prospect of developing this land at present is unrealistic. Due to this and existing commitments at Granville, the amount of land available to the market is substantially diminished to that identified in Table 2”*.



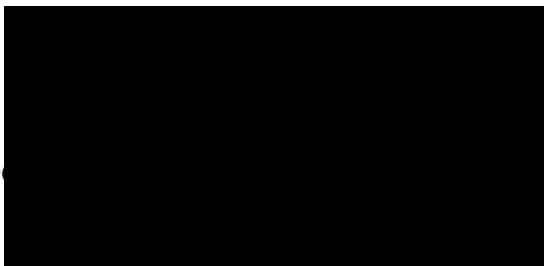
Map identifying lands that should be removed from Industrial Zoning



We believe that this proposal for one single huge industrial estate should be reconsidered. Industrial lands should be broken up through the Dungannon Area to better serve the business community and better protect the local residential community.

Therefore, we would respectfully request that our observations are considered within the next phase of the Area Plan development.

Signe



Dated 21st September 2020