

**Elaine Mullin**

---

**From:** Theresa Cassidy <info@tctownplanning.co.uk>  
**Sent:** 19 April 2019 14:02  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** G/016/19 & G/020/19 - Representation for draft Plan Strategy  
**Attachments:** Representation to Mid Ulster Council 19.04.19.pdf; Representation submitted to Council 19.04.19.pdf

Dear Sir/Madam,

Please find attached 2 number of representations in response to Mid Ulster Council's Draft Plan Strategy public consultation; a hard copy of same will also be delivered to your office this afternoon. I trust these will be given appropriate consideration in the next stage of the plan process.

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

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

Kind regards,

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

**TC TOWN PLANNING**

Town & Country Planning Consultant  
Unit C12  
The Business Centre  
80-82 Rainey Street  
Magherafelt  
BT45 5AJ

T: [REDACTED]  
E: info@tctownplanning.co.uk  
W: [www.tctownplanning.co.uk](http://www.tctownplanning.co.uk)

**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

**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)

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

Address Line 1	2ND FLOOR,	UNIT C12
Line 2	CORNER HOUSE	THE BUSINESS CENTRE
Line 3	64-66A MAIN ST.,	80-82 RAINEY ST.,
Line 4	COALISLAND.	MAGHERAFELT.
Post Code	B771 4NB	B745 5AJ.
Telephone Number		
E-mail Address	info@tctownplanning.co.uk.	

**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 SPF 2
- (iv) Policy REL TRANS 1 + TRANS 3.
- (v) Proposals Map 1.8.
- (vi) Site Location LAND BETWEEN GREENS RD + QUARRY LANE

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.

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 APPENDED PAGES

*(If not submitting online and additional space is required, please continue on a separate sheet)*

6. If you consider the DPD to be unsound, please provide details of what change(s) you consider necessary to make the DPD sound.

Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. There will not be a subsequent opportunity to make a further submission based on your original representation. After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

*(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: [REDACTED] Date:

**Part 5**

**If you consider the DPD to be sound and wish to support the DPD, please set out your comments below.**

The following comprises a comment on Spatial Planning Framework 2 and Policies RE 1, TRAN 1 and TRAN 3 of the draft Plan Strategy (dPS) so that committed development, planning reference M/2014/0572/O – land accessing onto Greer's Road, Donaghmore Road and Quarry Lane, Dungannon, is safeguarded, considered comprehensively and forms an integral part in the next stage of the plan process in alliance with the following draft framework objective and policies.

**SPF 2 – Focus growth within the three main towns/hubs of Cookstown, Dungannon and Magherafelt and strengthen their roles as the main administrative, trade, employment and residential centres within the District.**

SPF 2 with regards to economic growth within the three main hubs of Cookstown, Dungannon and Magherafelt will support and enhance the vitality and viability of the town centres which is in accordance with the approach advocated by the RDS. These hubs of economic activity should be protected where possible and all measures taken to ensure ease of access, connectivity, vibrancy and competitiveness continue to exist and prosper should be supported by the council.

Dungannon town centre is recognised as the weakest of the three main town centres. Committed development therein should be protected where this will undoubtedly support and strengthen the capacity of the town centre to compete comparably with Cookstown and Magherafelt in the near future. This will also ensure that a percentage of the 8,500 new jobs to be created as set out in the dPS plan objectives, section 3.15, are delivered throughout The Plan period.

An integral development supporting SPF 2 is that approved for M/2014/0572/O involving a spine road linking Quarry Lane to the north to Greers Road to the south. This trunk road will provide direct vehicular and pedestrian access to the town centre and primary retail core for Dungannon with public car parking located nearby. This large scale development with major infrastructure provision will enable the council to deliver on the desires of SPF 2 helping Dungannon town centre to grow and prosper aiding the economy and enhancing the attraction of the town.

Paragraph 3.17 (1) of the dPS places Town Centre First in the hierarchy for Retailing, Offices and Town Centres and advocates that this should accommodate a mix of uses including town centre housing.

**Policy RE 1 – Development Within Town Centres**

Protection of the town centre for a mix of uses as proposed by Policy RE 1 will ensure that the town remains an attractive place for visitors to the area, those from surrounding hinterlands and the existing urban population. The dPS acknowledges that Dungannon Town Centre has the potential to expand spatially, as opposed to Cookstown and Magherafelt which have less opportunity for expansion with focus geared towards intensification. Thus it is incumbent on the council to ensure that Dungannon has sufficient provisions and amenities made available to sustain potential growth and that no restrictions are put in place that would compromise the potential of the expanding town centre.

A key feature to grow the vitality and vibrancy of Dungannon Town Centre will be the link road that forms part of permission M/2014/0572/O between Greers Road and Quarry Lane. This will enable visitors and residents to access the town centre via an alternative traffic route, reducing traffic congestion thereby appearing more attractive as a destination leading to economic growth and prosperity.

Residents will also be encouraged to walk to the town centre as this safe, direct link reduces the need to rely on the private car proving betterment for the well being of the surrounding residents and businesses. The spine road will provide connectivity with the town centre encouraging and increasing footfall to the surrounding shops and businesses.

Designation DOS 05 of Map No. 61b – Dungannon Town Centre of the extant Dungannon and South Tyrone Area Plan 2010 remains within the town centre boundary as directed by Map 1.8 – Dungannon Primary Retail Core of the dPS. To ensure the new LDP delivers on the core principles and objectives identified in the dPS, the Key Site Requirements laid out in the extant area plan for designation DOS 05, especially with regards to access, should be carried forward for the new LDP. Adopting these KSR's will ensure the overarching objectives of the dPS will be upheld contributing to the essential aim of enhancing the diversity, vibrancy and vitality of the town centre.

**Policy TRAN 1 – New Roads and Road Improvement Schemes**

Planning permission M/2014/0572/O aims to deliver on providing a connecting route which leads directly to public car parking, the town centre and primary retail core. This would prove a vital link road for the town, offering an alternative route to the town centre and alleviating congestion along other main trunk roads. Safeguarding permission M/2014/0572/O and the access arrangements conditioned therein will honour this policy.

**Policy TRAN 3 – Car Parking**

This works in tandem with sustaining vibrant town centres within the three main hubs due to the high reliance on the private car resulting from a high rural population. Travelling to the main centres would most likely occur by car due to current public transport inadequacies and until these have been improved sufficiently public car parks should remain within the town centre boundary in accordance with this policy.

**Comment**

Lands within designations DH 01 and DOS 05 as identified in Map No.'s 61a and 61b respectively of the extant Dungannon area plan will contribute to meeting the overarching objectives and policies of the dPS. In addition to meeting the aims and desires of the aforementioned policies visitors and surrounding employees will be encouraged to access the town centre on foot as opposed to the private car reducing traffic congestion, lessening carbon emissions thereby improving the carbon footprint and encourage healthier options of reaching the town centre.

The link road associated with permission M/2014/0572/O evolved from discussions with DfI Roads Service and therefore plays a strategic role as an important distributor road for Dungannon town; its integrity should not be compromised moving forward with the next stage of the plan process.