

ANNEX B – Response Pro-forma

Name: OONAGH GIVEN

Address: 10 Carnan Park, Omagh, BT79 7XA


Original Representation Reference Number: MUDPS/3 (for administrative use only)

Please tick the applicable box below.

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

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

- c) I confirm that I wish for my original representation to be withdrawn and that I no longer wish to make a representation.

Signature: 

Date: 16 March 2020

If you require assistance when completing the above, please contact developmentplan@midulstercouncil.org

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

OONAGH GIVEN CHARTERED TOWN PLANNER**10 Carnan Park, Strathroy, Omagh County Tyrone BT79 7XA****Mobile:** [REDACTED]**E mail:** [REDACTED]

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

18 March 2019

Dear Ms McEvoy,

Response to Draft Plan Strategy – Zoning D ECON 1 at Granville

Land belonging to my client lies within the above proposed zoning. My client is in support of the D ECON 1 zoning for economic development at Granville and considers that it complies with the Soundness Tests. In the event that a representation is made contesting this zoning and/ or the policies associated with it I will make a counter representation.

I understand that the Council will require 170 hectares of land zoned across Cookstown, Dungannon and Magherafelt for economic development use and that given that there is an immediate need for economic land in Dungannon, land has been zoned at both Dungannon and Granville. The remaining economic development lands will be zoned as part of the Local Policies Plan.

I wrote to the Council previously with respect to the inclusion of my client's land for economic development use in November 2017 and have enclosed the representation which was made at that time. If for any reason the above zoning is removed from the Plan Strategy as a result of the Independent Examination, my client would wish that his site be considered as part of the *Local Policies Plan* – hence the reason for enclosing the representation.

Yours sincerely

Oonagh Given



ACEmap® Single

Printed: 27/11/2017 Customer Ref: **Granville**

Centre Point (Easting, Northing): 276577, 360350

Scale: 1:2,500

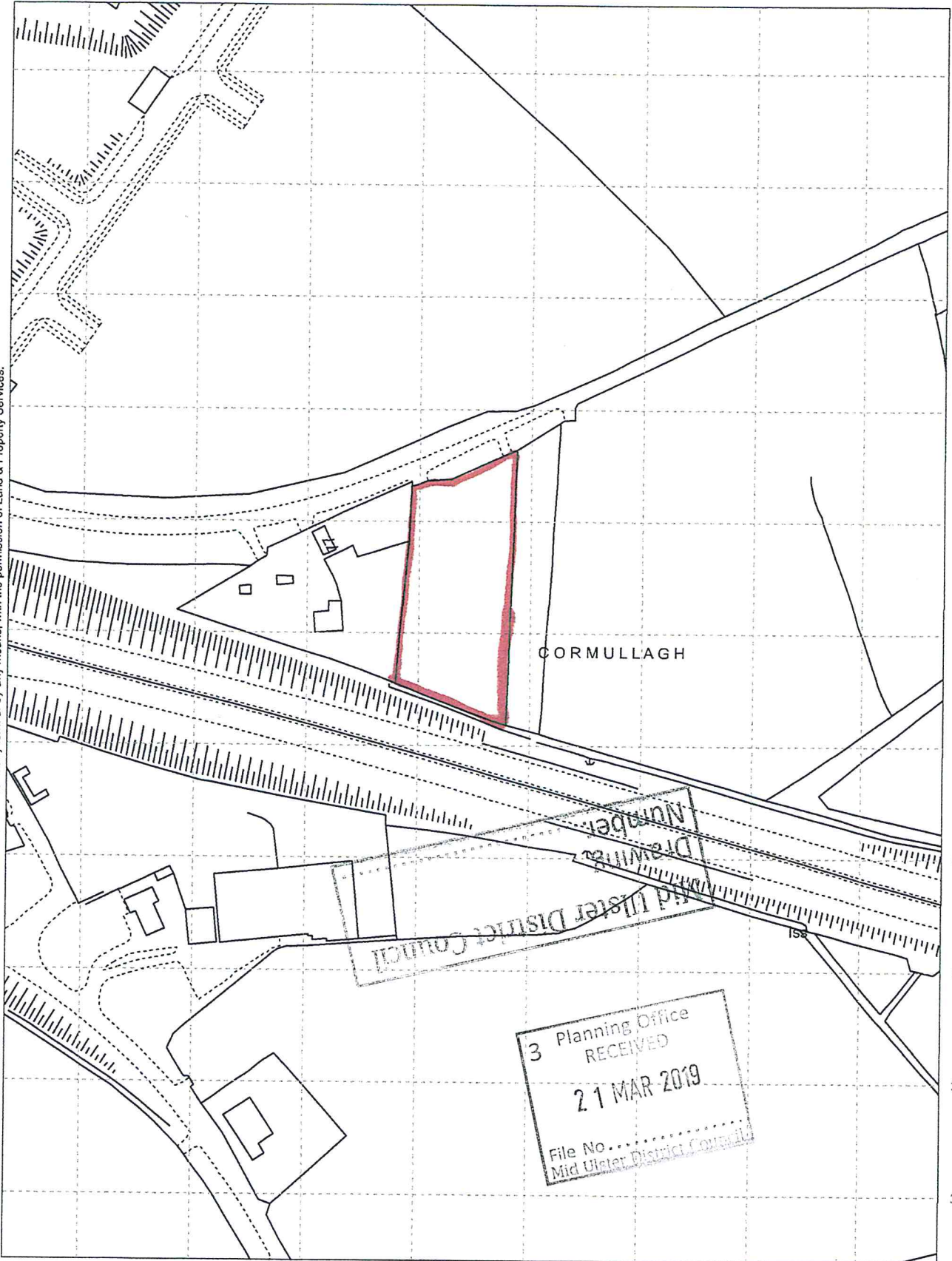
Order no. ORD48200

Plan No. 17901NE

Lands for inclusion in settlement limit

276786
360630

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Case for the inclusion of Lands at Eskragh Road, Granville to be zoned for economic development land as part of the Mid Ulster District Council Local Development Plan 2030.

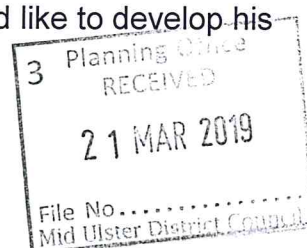
Prepared by Oonagh Given Chartered Town Planner
On behalf of Mr William McClean

1.0 The Site Location and Context

- 1.1 The site is situated on the edge of the village of Granville which itself is one mile from the centre of Dungannon town. Granville is distinguished by its extensive industrial estate which spreads westwards from Granville Road. Residential development takes a linear form along Granville Road with a few in depth housing estates. About three quarters of the total urban footprint of Granville is taken up by the industrial estate.
- 1.2 The subject site comprises a rectangular field of 0.52 hectares and is accessed directly off Eskragh Road. The site is part of an undeveloped area of land grown over with rushes and sandwiched between the existing Granville Industrial Estate to the north and the A4 dual carriageway to the south. The site follows the topography of Eskragh Road sloping down from west to east. West of and adjacent to the site is a detached domestic property with what appears to be some sort of haulage or transport enterprise attached. The lands adjacent and to the east are undeveloped and, except for the presence of a stock proof fence, are indistinguishable from the site.
- 1.3 Overlooking the site on the opposite side of the A4 is Ewing Bros which is a freight company and next to that is a yard used by Moy Park.
- 1.4 Access to the dual carriageway is around 100 metres away.
- 1.5 The site forms part of an agricultural holding which is operated at Inishtieve, Carrickmore.
- 1.6 The attached map shows the site outlined in red and some of the neighbouring businesses are also indicated.

2.0 Proposed Used

- 2.1 The land owner is William McClean. Mr McClean is the owner of a firm called Plant and Design Engineering which makes machines for the quarrying and recycling industries. Plant and Design Engineering comprises four members of staff (three full time and one part time) plus Mr McClean. The business currently operates out of rented accommodation on Legilly Road, Greystone and has done so for approximately 20 years. Mr McClean would like to develop his business at the subject site.



3.0 The Dungannon and South Tyrone Area Plan 2010

- 3.1 The land is located south of and adjacent to the limit of development for Granville as identified in the Dungannon and South Tyrone Area Plan 2010 (DSTAP 2010). The lands on the opposite side of Eskragh Road and north of the site are zoned for industry and business (Plan reference DI 01).
- 3.2 The DI 01 zoning roughly lies along a south west / north east axis. On its eastern side it is bounded by existing industry and countryside (including the subject site). Its southern tip brushes the A4 dual carriageway, and otherwise the remaining boundaries to the south west and north lie adjacent to the countryside.
- 3.3 The DSTAP 2010 states that:
“Granville provides the Borough’s strategic location for industrial development and it is anticipated that it will meet the requirements of INI over the Plan period. It is ideally located for further expansion close to the primary road network and there is potential to strengthen its role by development at this location”.
- 3.4 The DI 01 zoning has been developed in the years following the publication of the DSTAP 2010.
- 3.5 Adjacent to and west of the DI 01 zoning is a designated Site of Local Nature Conservation Interest (SLNCI) - Black Lough (Cormullagh). Some 200 metres away to the north of the zoning is the Eskragh Lough SLNCI.
- 3.6 Within the vicinity of Eskragh Lough and north of the DI 01 industrial zoning are three archaeological sites.

4.0 The Regional Development Strategy 2035

- 4.1 The Regional Development Strategy 2035 identifies a tiered system of economic corridors that link principle cities and centres of industry known as the *Regional Strategic Transportation Network*. At the top tier are *key transport corridors* and the next tier down from that are *link corridors*.
- 4.2 The A29 which runs from north to south through the Mid Ulster District connecting the three main towns is one such *link corridor*. After passing through Dungannon it connects with one of the region’s *key transport corridors* – the M1. Granville is around 5 kilometres from the junction of these two significant transport routes
- 4.3 The RDS identifies certain settlements as *Main Hubs* for the purpose of benefiting from and adding value to regional economic growth. Cookstown and Dungannon are two of such *main hubs* in the Mid Ulster District and Granville is one mile from Dungannon, the larger of the two.

5.0 The Mid Ulster District Council Local Development Plan 2030 - Preferred Options Paper

- 5.1 The Preferred Options Paper (POP) has formulated a number of Strategic Planning Guidelines for the development of the District. SPG 1 proposes to define settlement limits to “*provide compact urban forms*” and “*to protect the setting of individual settlements*”. SPG 4 proposes to “*maintain and consolidate the role of the villages as local service centres providing opportunity for housing, employment and leisure activities in keeping with the scale and character of individual settlements*”.
- 5.2 For the purpose of the Mid Ulster Local Development Plan, Granville maintains its status as a village.
- 5.3 The POP acknowledges that the population of Mid Ulster is growing at a rate that is twice that for Northern Ireland and that by 2030 land will be required for 8500 new jobs in the district. This has been translated into the need for 170 hectares of zoned industrial land in Mid Ulster which will be spread out across the three main towns – Cookstown, Dungannon and Magherafelt. Dungannon is the largest town in the District and the POP states that industrial land supply in Granville will be vital in supplementing the availability of industrial land in Dungannon
- 5.4 For the purpose of identifying land to provide for the 8500 new jobs anticipated over the plan period, the POP has come up with a number of options for locating economic development land in some of the settlements including Granville.
- 5.5 The three economic development growth options for Granville are:
Option 1 east of the A45 Granville Road
Option 2 west of Killyliss Road just opposite “Portafill International”
Option 3 south east of the Eskragh Road and including the subject site.
- Option 1
- 5.6 Option 1 shows extension to the east of the A45, extending development southwards (from the village) along the length of Granville Road towards the A4. It is bounded by Killybracken Road to the north east; the lands to the south east and to the North West on the other side of Granville Road are fields. There is a house adjacent to the south west. There are a number of detached dwellings in the vicinity along Killybracken Road including one just across from the site.
- 5.7 Part of this site next to Granville Road is affected by the Q100 floodplain.

Option 2

- 5.8 Option 2 shows a westward expansion of the existing industrial area on the opposite side of Killyliss Road and running along the north side of the A4 dual carriageway. The field nearest the village is flat and the surrounding lands to the north comprise undulating fields with mature hedgerows. Option 2 is bounded by an access road on to the dual carriageway on its south eastern side. Portafill International is located immediately opposite (i.e. to the east) on Killyliss Road.
- 5.9 A small water course traverses the lands. A small area appears to be in the surface water flood plain.

Option 3

- 5.10 Option 3 shows an extension into the lands on the southern side of Eskragh Road. These lands include the subject site. These lands are covered in rushes and follow the topography of Eskragh Road which forms a dip right at the centre of the lands in question. The lands on the opposite side of Eskragh Road form part of the Granville Industrial Estate and are fully developed. There is a house and commercial business west of and adjacent to Option 3. The lands are bounded by the A4 dual carriageway to the south and are overlooked by Ewing Bros. freight business which occupies a prominent position on the other side of the dual carriageway. The remaining lands to the east comprise fields and contain a complex of buildings which appear to accommodate an upholstery business (McClure's).
- 5.11 A small area appears to be in the surface water floodplain.

6.0 The case for further economic development lands at Granville

- 6.1 Granville is located around 5 kilometres from the junction of the A29 (Mid Ulster Spine) and the M1, and at its southern reaches is only about 100 metres from the A4 dual carriageway (which forms part of the same key transport corridor as the M1).
- 6.2 Given its position relative to two significant transport routes, Granville is well placed as a departure point for access to Belfast, the West, Dublin and the Republic of Ireland. The extant Dungannon and South Tyrone Area Plan 2010 states that:
- “Granville provides the Borough’s strategic location for industrial development and it is anticipated that it will meet the requirements of INI over the Plan period.”*
- 6.3 While the plan area for Mid Ulster District is much larger than the former Dungannon and South Tyrone Borough, it is contended that Granville maintains its former “*strategic location*” even with the plan area expanded to include the former Magherafelt and Cookstown District Councils. This is because of its excellent links to the Regional Strategic Transportation Network and its proximity to Dungannon which is the largest town in Mid Ulster District and one of the 15 towns in Northern

Ireland designated as *main hubs* by the Regional Development Strategy 2015.

- 6.4 Further economic development lands at Granville would also help to consolidate its role and character as an existing centre for industry in accordance with SPG 4 of the Council's Preferred Options Paper.

7.0 The case for zoning economic development land at Option 3

- 7.1 The Mid Ulster District Preferred Options Paper shows three options for expanding Granville for the purpose of industrial and business development. One of these options – Option 3 includes the subject site. The case in support of Option 3 and the subject site is made having regard to a number of planning considerations as set out below and by comparing Option 3 to the other two options where applicable.

Protection of designated sites

- 7.2 It is noted that all three options are generally to the south of the village and it is assumed that this is because of the presence of the Black Lough and Eskragh Lough Sites of Local Nature Conservation Interest to the north and North West, and the presence of archaeological sites to the north of the settlement.
- 7.3 Development of the lands at Option 3 will take development away from these sites of archaeological and nature conservation interest.

Flooding

- 7.4 A significant portion of the lands at Option 1 (along the Granville Road) are contained within the Q100 flood plain. Under the Strategic Planning Policy Statement (SPPS), Local Development Plans should not bring forward sites or zone land that may be susceptible to flooding unless in exceptional circumstances. The fact that the area of flood risk is all along the part of the site next to the public road may prohibit the zoning of these lands for development if they cannot be accessed from Granville Road.
- 7.5 Discrete areas of surface water flood plain are indicated on the land at Option 3 (option 3 includes the subject site). However given their limited area, and the fact that they do not prohibit access from the public road, it would be possible to develop the surrounding lands without imposing on the areas of surface water flooding.

(SPG 1 of the Preferred Options Paper) – Compact Urban forms and the setting of settlements

- 7.6 Development of Option 3 will achieve a compact urban form and protect the setting of Granville more so than the other two options. This is because Option 3 is surrounded by existing development. It is bounded by the existing industrial estate on two sides (immediately to the north and a little further away to the east), and although Ewing Bros. on Killyliss Road is outside of the settlement limit it occupies a

prominent position in terms of the setting of the village and is located just south east of the subject lands.

- 7.7 At present the lands at Option 3 are of no consequence in terms of the setting of the village surrounded as they are by development both in and outside of the existing settlement limit. Development of option 2 would extend development in a linear fashion away from the centre of the village into an area of attractive countryside to the west and could have the effect of undermining the setting of the village.

Residential Amenity

- 7.8 The development of land for industrial / business purposes has the potential to impact on residential amenity by means of the likes of noise, fumes or dust. For an industrial / business zoning to be as efficient as possible it should be able to accommodate a range of types of industries without the risk of planning permission having to be refused for a particular scheme because it may have a detrimental impact on residential amenity. For that reason industrial / business zonings may be better located further away from predominantly residential areas.
- 7.9 Option 3 and the subject site are already surrounded by business and industrial land use and are removed from the residential part of the village. Apart from a single detached house, which appears to have a commercial business attached, adjacent to the subject site, there appear to be no other dwellings within the immediate vicinity.
- 7.10 Of the three options Option 1 is closest to the mainly residential village "centre" to the north, there are also detached residences on either side of Option 1 and some sporadic residential development a little further away to the south east on Killybracken Road.
- 7.11 The development of land for industrial or business use at Option 3 would be in accordance with the nature of development in the surrounding context and is much less likely to impact on residential amenity than Option 1.

9.0 The case in support of zoning the subject site for economic development

- 9.1 The prospect of land being released for development by the respective landowner and the willingness of business people to invest in a particular location is a matter of relevance to the planning authority when zoning land for economic development.
- 9.2 At the UK level it has been reported that there is an issue with "land banking" where land that has received planning permission for housing, or is zoned for housing, is not actually being developed. Whilst the delivery of land for housing and economic development is a function of the planning system it also depends on land owners, developers and business people to realise such plans.

- 9.3 In the case of the subject site, the landowner is William McClean who owns Plant and Design Engineering, a business that manufactures machines for the quarrying and recycling industries. Mr McClean has developed his business over the past 20 years or so from rented premises on Legilly Road, Greystone.
- 9.4 At present Mr McClean finds the site at Greystone to be limiting in terms of space and in terms of how he may use the yard as it is also used by the landlord. The existing business is in the countryside and is not associated with any settlement, which from a planning point of view is not very sustainable. Any plans to develop the business at this rural location may also be inhibited by rural planning policy.
- 9.5 Mr McClean's plan would be to develop the business at the subject site. The inclusion of Option 3 lands into the industrial and business zoning would facilitate the movement of (or expansion of) an established business in a remote rural location to a more sustainable location where planning policy will be more favourable towards any necessary expansion.
- 9.6 The importance of firms involved in manufacturing products for the quarrying industries in Mid Ulster is acknowledged in the Council's Preferred Options Paper. Given that sand and gravel and related businesses make a significant contribution to the Mid Ulster economy, it is important that there is healthy market competition to cater for the needs of all those involved. This means allowing smaller businesses such as Plant and Design Engineering to flourish; thereby offering alternatives and complimenting the larger firms.