

**Roisin McAllister**

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**From:** Matt Kennedy [REDACTED]  
**Sent:** 24 September 2020 15:49  
**To:** DevelopmentPlan@midulstercouncil.org; Planning@Midulstercouncil.org  
**Cc:** 'Dermot Friel'; 'Gerard McPeake'; Aoibhinn Roarty  
**Subject:** Mid Ulster LDP  
**Attachments:** LDP. swatragh.pdf

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

Dear Sir/Madam

Please see attached LDP representation.

Please acknowledge receipt of same.

Regards

Matt

**Matt Kennedy**  
**Principal Planning Consultant**



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Before you print think about the ENVIRONMENT

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**RE: MID ULSTER DISTRICT  
COUNCIL;  
LOCAL DEVELOPMENT  
PLAN 2030  
DRAFT PLAN STRATEGY**

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**Representations to  
Draft Plan Strategy**

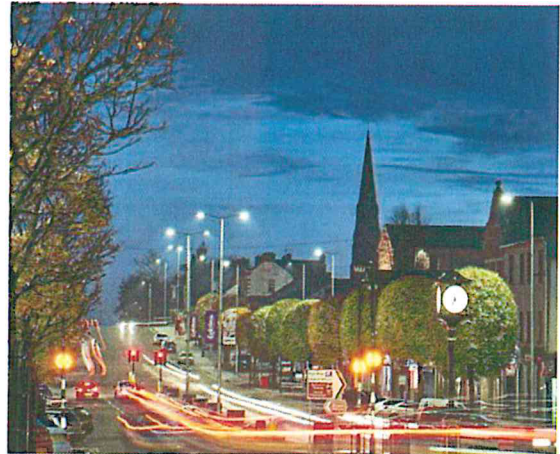
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*ON BEHALF OF*

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Mr Dermot Friel

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*AUTHOR*

**Matthew William Kennedy BSc (Hons)  
DCA, Dip TP, MRTPI**

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**1.0 Introduction.**

1.1 This representation is prepared by MKA Planning on behalf of Mr Dermot Friel in response to the publication of, and formal consultation on, Mid Ulster District Council's Draft Plan Strategy (dPS).

1.2 Our Client welcomes the publication of the dPS and the progress that the Council is making towards adopting a local development plans for the area.

1.3 The representation is also supported by the following appendix:-

- Appendix 1: Completed Draft Plan Strategy Questionnaire.

**Summary of Key Comments**

<b>dPS</b>	<b>Policy</b>	<b>Test of Soundness</b>	<b>Modifications Sought</b>
	Local Development Plan Timetable	P1	The Plan timetable should be amended to allow for future compliance.
	Plan Period	C 1 C 3 CE 4	The Plan Period should be extended to 2035, to increase the potential for the plan to better reflect the direction of the RDS, and to be consistent with Development Plan Practice Note 01. The housing allocation for the Plan should be increased proportionally.
	SPF 1	CE 1  CE 2  CE 4	The Plan needs to set out a coherent strategy from which its policies and allocations logically flow.  The Strategy, policies and allocations must be realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base. The evidence base is not robust.  The Plan must be reasonably flexible to enable it to deal with changing circumstances.
	SPF 4	CE 1  CE2  CE 4	The Plan needs to set out a coherent strategy from which its policies and allocations logically flow.  The Strategy, policies and allocations must be realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base. The evidence base is not robust.  The Plan must be reasonably flexible to enable it to deal with changing circumstances.
	HOU 2	CE 2	The Strategy, policies and allocations must be realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base. The evidence base is not robust.

The reasoning behind these representations and requested modifications is set out below.

## **2.0 Mid-Ulster Local Development Plan Timetable**

- 2.1 The Mid Ulster draft Plan Strategy fails to meet procedural test P1, as it has not been prepared in accordance with the council's timetable for adoption of the LDP.
- 2.2 The Mid-Ulster Local Development Plan timetable states that by Winter 2019/20 the dPS would be at Independent Examination.
- 2.3 However, due to a procedural error the progress of the plan has been delayed by almost a year and the dPS is now back out for public re-consultation. A consultation period for counter objections will also need to be provided further delaying progress of the plan.
- 2.4 While it is acknowledged that the timetable is an estimate, this divergence from the timetable results in the dPS failing procedural test P1.
- 2.5 We would suggest that consideration is given to modifying the timetable to allow for future compliance of the dPS and the adoption date for the LDP to be pushed back accordingly.

**The dPS is in contravention of Procedural Test P1 as it is not in accordance with the published Council Timetable. The timetable needs to be revised.**



### **3.0 Plan Period**

- 3.1 The plan period is to 2030 – calculated from 2015 when Council assumed plan making responsibility.
- 3.2 On the basis of the Council’s latest published timetable, the Local Policies Plan (LPP) part of the Plan is not anticipated to be adopted until the end of 2022/2023.
- 3.3 It is clear already that the procedural error mentioned in Section 2 above will significantly push back the adoption date for the dPS.
- 3.4 Given the possibility for further procedural errors and future legal challenges, it would be extremely optimistic to suggest that the LPP part of the Plan would be adopted during Q4 of 2022/23 considering the consultation period for counter objections and independent examination is also yet to be carried out and we are already now in Q4 of 2020.
- 3.5 It is more likely that the LPP will be adopted in 2025 or 2026 at the earliest and this does not take into account the high potential for further procedural errors or legal challenges to this new development plan making system.
- 3.6 This would only leave four or five years of a plan period to 2030. The decision for the Council would then be whether to undertake the five year review of the plan or start a new plan making process at this point.
- 3.7 It is understood that plans are material beyond their stated end date. However, given the time and resources being invested in the process by the Council, consultees and stakeholders, getting the maximum benefit out of the plan making process is critical.
- 3.8 The length of time it takes to prepare applications and secure planning permission on freshly zoned land is also an important consideration – a housing site which is only newly zoned in 2026 would not be likely to be able to be commenced for development until 2028 ensuring a two year realistic ‘lead in’ period for new housing zonings.
- 3.9 Belfast City Council has taken a slightly longer term view and established a plan period to 2035, while Derry City & Strabane District Council has extended its plan period to 2032. Mid Ulster Council should also consider taking a more long term view and we would recommend a plan period to 2035.

- 3.10 A longer plan period, to 2035 would not only provide the Council more scope to better reflect the direction of the RDS (**soundness test C1**), it would also make it more likely that the final plan could clearly and distinctively move the statutory plan for the District beyond the '**legacy**' strategies, limits and zonings of the older plans – this would also be consistent with the Development Plan Practice Note 01 reference to a 15 year plan framework (**soundness test C3**) and will provide reasonable flexibility to enable the new plan to be able to deal with changing circumstances (**soundness test CE4**).
- 3.11 Otherwise, a possible risk is that when the LPP part of the plan is finally adopted, comparison with previous DOE plans could raise questions around what has actually changed as the adopted plan may be in many ways similar to previous departmental plans.
- 3.12 Selection of a longer plan period would also reduce the risk of having to identify additional land reserves to bridge a gap which might emerge in the future.
- 3.13 To ensure that the above issues are avoided, we would therefore request that consideration is given to extending the plan period up to 2035.
- 3.14 To reflect the increased plan period the proposed housing allocation should therefore be increased proportionally.

**In order to meet tests of soundness C1, C3 and CE4, the plan period should be extended and/or the housing allocation should be increased proportionally.**

#### 4.0 Policy SPF 1.

**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.**

4.1 Para. 4.8 of the Draft Plan's Strategy (dPS) states that 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.

4.2 However, when one looks at Appendix 1 of the dPS which provides housing local indicators over the Plan Period 2015-2030 and there are a number of assumptions that underpin the figures set out.

1. The number of households in each settlement are based on figures from the 2011 NI Census. These household figures are now nearly ten years out of date. The evidence base underpinning these indicators is therefore not robust.
2. The total number of households in the District Council Area, the settlements and host wards may have changed significantly in the last 10 years.
3. The total number of households in the various settlements may have changed significantly, either positively or negatively, during the last 10 years.
4. The percentage share of the proposed District Housing Growth Indicator (HGI) for small towns, villages or small settlements appears to be proportionally related to the actual settlement's percentage share of the District's households. Statistics which are now ten years out of date.
5. Allocating the HGI for small towns, villages or small settlements based solely on the actual settlements percentage share of the District's households is not managing growth based on sustainable patterns of development as stated in Policy SPF1 but is simply allocating growth based on the size of the settlement household population and not taking other relevant material factors into account.



6. The Mid Ulster HGI should also only be used for guidance on growth in the district council area and settlements rather than been seen as the sole determinant of growth, or a cap on development in the area or a target to be achieved. Other Council's have taken account of the HGI figures but have not been bound by it.
  7. The HGI projections for the district council area are based on demographic assumptions. These demographic assumptions and others could now also be applied within the Plan area to allow the Council to project forward the number of households in various settlements now in 2020.
- 4.3 In summary, it is contended that this strategic approach set out in Policy SPF 1 is far too simplistic an approach. There are a number of other material factors that need to be considered other than the total number of households settlements in allocating housing figures for a particular settlement, namely:-

**Demography.**

1. The dPS has based the proposed HGI figure primarily on the number of households within the settlement in the 2011 NI Census. However, we contend that the demography of the host and surrounding electoral ward for the actual settlement is another factor that has to be taken into consideration.

**Vulnerable Landscapes.**

2. The settlement's proximity to vulnerable landscapes increases pressure for more housing to be allocated within the settlement to accommodate housing need that cannot be accommodated within the settlement's development limits.

**Service Centre Provision.**

3. The scale, nature and extent of the service provision of a settlement is a material factor.

**Social Housing Need.**

4. The identified social housing need of a settlement is a material factor.

**Location along Key Transport Corridor.**

5. The settlement's location or not along a key transport corridor is a material factor.



**Proximity to Neighbouring District Council Area.**

6. The settlement's location close to the boundary with a neighbouring council area is a material factor.

**The Need for a 5 year Housing Land Reserve.**

7. Within small towns, villages and small settlements development limits need to be defined to ensure that there is a minimum 5 year housing land reserve at the end of the dPS Plan period.

**Social and Economic Characteristics of a Settlement.**

8. The social and economic characteristics of a settlement is another relevant factor.

**Multiple Housing Approvals in Rural Area.**

9. There are a number of multiple social housing developments which have been approved on the edge of settlements, in the rural area, under Policy CTY 5 of PPS 21. These existing or approved developments also need to be incorporated within the new settlement limits.

**Therefore, for the reasons set out above we contend that Policy SPF 1 is therefore contrary to Test CE1, Test CE2 and Test CE4 as the dPS does not provide a coherent strategy from which its polices and designations flow, policies and allocations are not realistic and appropriate, it is not based on a robust evidence base and the Plan is not reasonably flexible to deal with changing circumstances.**

## 5.0 Policy SPF 4.

**SPF 4 – 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.**

5.1 Paragraph 4.25 of the dPS states that in the main growth in the villages will be proportionate to their current size **and the level of services on offer.** (my emphasis)

5.2 However, when one looks at **Appendix 1** of the dPS the proposed future local housing indicators of villages would appear to be almost entirely determinant on the number of households within the settlement.

5.3 The proposed future growth of settlements prior to the publication of the LPS is strategically as set out in Appendix 1. It would appear from the dPS that these housing local indicators are in no way dependent on the level of services provided within the settlement.

5.4 This is not a factor that appears to be considered or taken into account in the allocation of the HGI figures in Appendix 1.

5.5 There are a number of assumptions that underpin the figures set out in Appendix 1, namely:-

1. The number of households in each settlement are based on figures from the 2011 NI Census. These household figures are now nearly ten years out of date. The evidence base underpinning these indicators is therefore not robust.
2. The total number of households in the District Council Area, the settlements and host wards may have changed significantly in the last 10 years.
3. The total number of households in the various settlements may have changed significantly, either positively or negatively, during the last 10 years.
4. The percentage share of the proposed District Housing Growth Indicator (HGI) for small towns, villages or small settlements appears to be proportionally related to the actual settlement's percentage share of the District's households. Statistics which are now ten years out of date.

5. Allocating the HGI for small towns, villages or small settlements based solely on the actual settlements percentage share of the District's households is not managing growth based on sustainable patterns of development as stated in Policy SPF1 but is simply allocating growth based on the size of the settlement household population and not taking other relevant material factors into account.
  6. The Mid Ulster HGI should also only be used for guidance on growth in the district council area and settlements rather than been seen as the sole determinant of growth, or a cap on development in the area or a target to be achieved. Other Council's have taken account of the HGI figures but have not been bound by it.
  7. The HGI projections for the district council area are based on demographic assumptions. These demographic assumptions and others could now also be applied within the Plan area to allow the Council to project forward the number of households in various settlements now in 2020.
- 5.6 In summary, it is contended that this strategic growth approach for villages as set out in Policy SPF 4 of maintenance and consolidation is not based on village's role as local service centres but on the local housing indicators set out in Appendix 1. This is a very mechanical and simplistic approach.
- 5.7 There are a number of other material factors that need to be considered other than the total number of households within particular settlements in allocating housing figures for a particular settlement, and we have used the village of Swatragh as an example to help illustrate these points, namely:-

#### **Demography.**

1. The dPS has based the proposed HGI figure primarily on the number of households within the settlement in the 2011 NI Census. However, we contend that the demography of the host and surrounding electoral ward for the actual settlement is another factor that has to be taken into consideration. For example, while the growth in the households within a settlement might be limited I note that Swatragh Ward population increased from 2,669 people in 2001 to 3,516 people in 2011 – a **31.7** per cent increase in population. Between 2004-2015 Swatragh Ward has increased by



20.9 per cent while Mid Ulster Council area population has increased by 16.5 per cent. Swatragh Village serves as a significant service centre for the surrounding electoral ward but the local housing indicators do not take this factor into account.

#### **Vulnerable Landscapes.**

2. The settlement's proximity to vulnerable landscapes increases pressure for more housing to be allocated within the settlement to accommodate housing need that cannot be accommodated within the settlement's development limits. Swatragh has vulnerable landscapes to the east, south and west which have more stricter controls on development and residents may look to the settlement for their housing needs.

#### **Service Centre Provision.**

3. The scale, nature and extent of the service provision of a settlement is a material factor. Swatragh is a significant service centre for the surrounding population and with its business park is also a significant employment provider for the local area – providing 711 jobs in 2019.

#### **Social Housing Need.**

4. The identified social housing need of a settlement is a material factor. The Mid Ulster NIHE Investment Plan 2015-2019 identified five applicants in housing stress in Swatragh. In March 2019 this has increased now to twenty one applicants.

#### **Location along Key Transport Corridor.**

5. The settlement's location or not along a key transport corridor is a material factor. Swatragh is located along the A29 which is considered the spine of the Mid Ulster Council area.

#### **Proximity to Neighbouring District Council Area.**

6. The settlement's location close to the boundary with a neighbouring council area – Causeway Coast and Glens Council (CCGC) is a material factor. The closest town to Swatragh within CCGC is Garvagh. There are community tensions within Garvagh which may make Swatragh a more attractive location for new residents than Garvagh for CCGC residents.

#### **The Need for a 5 year Housing Land Reserve.**

7. Within small towns, villages and small settlements development limits need to be defined to ensure that there is a minimum 5 year housing land reserve at the end of the dPS Plan period. In the last DOE plan for the area - The Magherafelt Area Plan 2015 the settlement limits for Swatragh were dramatically reduced to the extent that two recent social housing developments for the village have had to be built outside the settlement.

#### **Social and Economic Characteristics of a Settlement.**

8. The social and economic characteristics of a settlement is another relevant factor. The most recent NI Multiple Deprivation Measures (NMDM) 2017 indicate that material deprivation is increasing in the ward.

#### **Multiple Housing Approvals in Rural Area.**

9. There are a number of multiple social housing developments which have been approved on the edge of settlements, in the rural area, under Policy CTY 5 of PPS 21. These existing or approved developments also need to be incorporated within the new settlement limits. Swatragh has two existing social housing developments approved outside the village limits.
- 5.7 In terms of the housing allocation for Swatragh it is noted that initially in the earlier Position Paper – Housing Allocation Appendix 1 proposed that Swatragh should be allocated land for an additional 49 houses.
- 5.8 However, in the POP in Appendix 1 the housing allocation for Swatragh has been reduced from 49 houses to 33 houses. This is approximately a **32.6%** reduction in housing allocation for Swatragh for the Plan Period.
- 5.9 As there already exists ten houses built and fourteen approved outside the existing settlement limits of Swatragh which are likely to be incorporated within the new development limits would suggest that the actual housing allocation for Swatragh as set out in Appendix 1 for the Plan Period is actually nine houses.
- 5.10 This reduction from a proposed allocation of 33 houses to a more realistic allocation of 9 houses is a reduction of **72.7%**. We believe that the local housing indicator for Swatragh should be increased to the original allocation of 49 houses as it would provide another twenty five dwellings within the village over the Plan Period.

**Therefore, for the reasons set out above we contend that Policy SPF 4 is contrary to Test CE1, Test CE2 and Test CE4 as the dPS does not provide a coherent strategy from which its polices and designations flow, policies and allocations are not realistic and appropriate, it is not based on a robust evidence base and the Plan is not reasonably flexible to deal with changing circumstances.**



**6.0 Policy HOU2 – Quality Residential Development.**

**Meeting the Needs of All – Provision of Mixture of House Types and Tenures.**

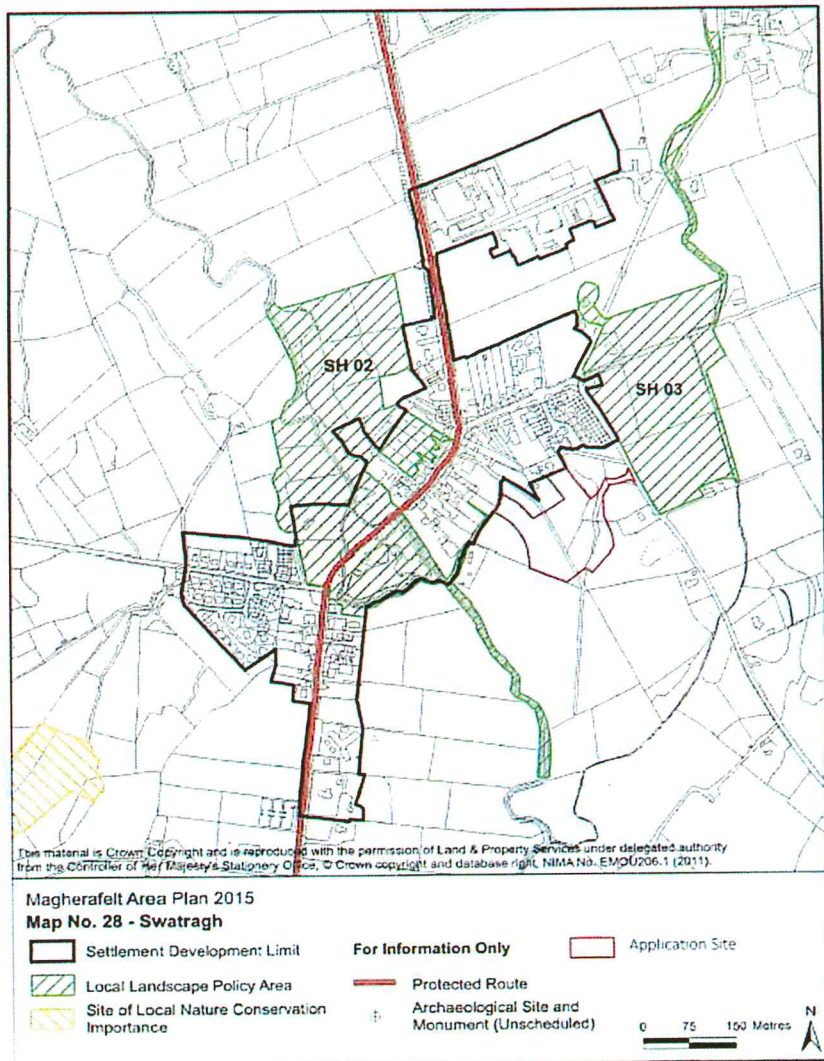
- 6.1 Paragraph 7.26 of the dPS states that in residential developments of 50 units or more or on sites of 2 hectares and over, social housing should be provided at a rate not less than 25% of the total number of units. This policy will apply where a need for social housing has been identified by the relevant strategic housing authority until such times that the Local Policies Plan brings forward sites with key site requirements addressing social housing needs.
- 6.2 We believe this policy is unsound and fails Coherence and Effectiveness Test CE4 as applying a blanket rate of 25% of social on all developments is not flexible, and would not be able to adapt to changing circumstances.
- 6.3 Not all areas of various towns and other settlements will have a social housing need of 25% within the site specific area, and it would be unfair to always require this percentage when the local housing need does not exist.
- 6.4 An oversupply of social housing units may result in migration of social housing needs applicants from other areas of towns, villages or small settlements. This could add to local community tensions and undermine the success of the development. We do not believe that this policy is realistic and appropriate having considered the relevant alternatives and is not based on a robust evidence base.
- 6.5 We therefore believe the rate of 25% social housing is reduced, and the policy be amended to be more reflective of local need.

**Policy HOU 2 – Meeting the Needs of All is not realistic or appropriate having considered the relevant alternatives and is not based on a robust evidence basis and is contrary to Test CE2.**

## 7.0 Site Specific Considerations

- 7.1 In the context of the strategic representations set out above, the LDP might, in future, consider the suitability of the Friel lands located North and West of Number 35 Upperlands Road, and to the immediate South West of the Church Way housing development. We respectfully request that all, or any part thereof of the subject lands should be incorporated within the new developments of Swatragh and zoned for residential use in the emerging Local Development Plan (LDP) for the Mid-Ulster District Council Area.
- 7.2 The site comprises undeveloped agricultural/grazing land. Planning permission has been granted for 14 no. dwellings on part of these subject lands in 2019 (Ref: **LA09/2018/0573/O**). The site is located outside the existing development limits of Swatragh, as set out in the current Magherafelt Area Plan 2015. The approximate site boundary is shown below.

**Map MKA 1: Swatragh Development Limits and Subject Site**





7.3 An aerial image of the site is shown below.

**Map MKA 2: Aerial View of the Subject Site**



#### 7.4 Planning History

- **H/2011/0574/RM** - The adjacent social housing development north of the site is known as Church Way and was developed by Dermot Friel. This permission was granted in 2011 for APEX Housing Association under Planning Policy CTY 5 of PPS 21.
- **LA09/2018/0573/O** - Planning permission has been granted in 2019, on part of the subject lands under Policy CTY 5 of PPS 21 for 14 no. dwellings (7 no. social and 7 no. affordable).

**Image MKA 1: Existing Housing Development at Church Way**



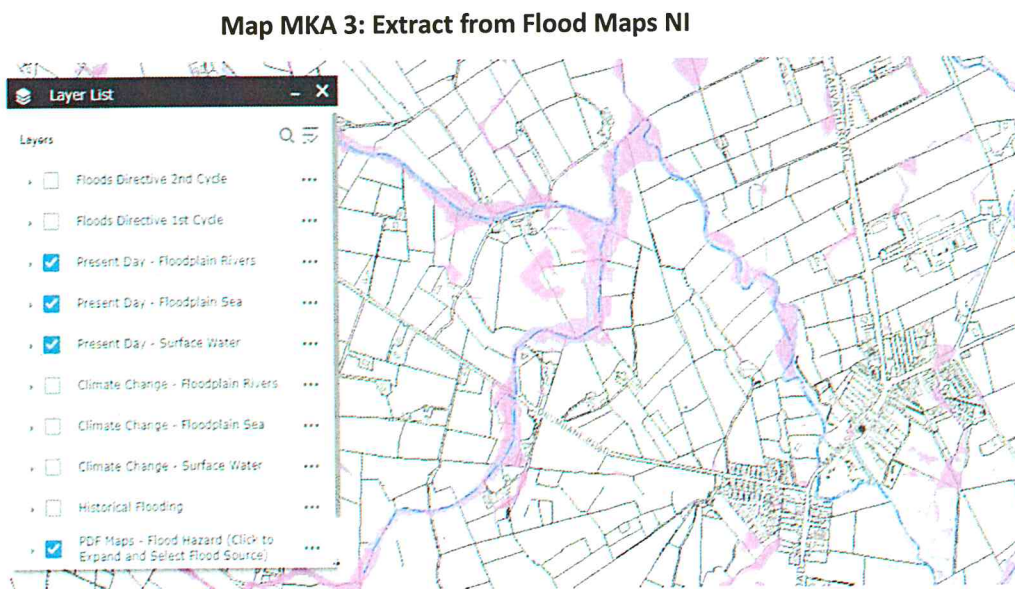
## Site Constraints

### *Historic Context*

- 7.5 On review of the Historic Environment Division Map Viewer facility, there are no historic features of relevance located on the subject site.

### *Drainage and Flood Risk*

- 7.6 Flood Maps NI (below) indicate there is a small portion of surface water flooding on the site.



- 7.7 Planning application LA09/2018/0574/RM addressed the issue of surface water flooding on this site. The Drainage Assessment submitted with this application identified an open drain cutting through the site. The Applicant intends to re-direct this drain to facilitate development and reduce the risk of surface water flooding. The case officer had no objections to this. Rivers Agency accepted the Drainage Assessment, and so, we believe surface water flooding is no longer an issue for this site.

### *Contaminated Land*

- 7.8 The site is undeveloped agricultural land. We do not envisage there to be any contamination issues which would preclude development of this land for housing.

### *Ecology*



- 7.9 Due to the planning history, and the previous approval on this site, we do not envisage there to be any ecological issues which could not be resolved or mitigated through the development management process.

#### ***Access***

- 7.10 Direct access to the site has already been approved under planning permission LA09/2018/0573/O.

#### **Design Considerations**

- 7.11 The potential constraints have been considered and the proposed design response set out below.
- 7.12 Any proposed residential development would be carefully sited and orientated in such a way that it does not negatively impact on the amenity of the existing adjacent residential development – including Church Way and the previously approved development on the site.
- 7.13 The development can be appropriately screened through landscaping and will provide a natural ‘rounding off’ to the settlement along the rural edges. Given the planning history of the site, this is a natural extension of the settlement.
- 7.14 Consideration should be given to the density of the adjacent developments.
- 7.15 Provision of detached and semi-detached homes, including social and affordable dwellings finished in high quality materials which complement the character of the area would be considered most appropriate.

#### **Principle of Development**

- 7.16 Whilst the subject site is not currently included within the settlement limit, if zoned, it could provide housing which is deliverable on the short to medium term and is not bound by any cumbersome infrastructure requirements.
- 7.17 The site would provide well needed social and affordable housing for the Swatragh area.

#### **Other Considerations**

### ***Village Status***

- 7.18 The draft Plan Strategy (dPS) proposes to upgrade Swatragh from a Small Settlement to a Village within the Settlement Hierarchy. In the adopted Magherafelt Area Plan 2015, there was no specific sites zoned for housing. We believe that the upgrade to Village status warrants an extension of the development limits and for housing lands to be zoned.

### ***Identified Social Housing Need***

- 7.19 We believe there is now an increasing social housing need in Swatragh, and the subject lands perfectly placed to meet this need. The NIHE Mid Ulster Housing Investment Plan 2015-2019 identified a social housing need for 9 households, 5 of which were in housing stress in Swatragh. However, at March 2019, this increased to 21 no. applicants (*Source – Mid Ulster Housing Investment Plan 2019/2023*).
- 7.20 The 2019-2023 Housing Investment Plan is stating that there is a need for 7 no. social houses in Swatragh for this period. However, given that the number of applicants has more than doubled in 4 years, we believe that more land should be zoned for social housing to ensure this increasing need can be met within the plan period. There is a current social housing need for Swatragh of 7 houses only addresses the local need up to 2023 not the entire Plan Period.
- 7.21 The proposed subject lands, includes land which the 14 no. dwellings, including 7 no. social houses, were recently approved on. We believe there is a need for at least another 24 no. social and affordable dwellings over the plan period, and these lands are ideally located to meet this need. The principle of housing along this boundary of Swatragh has been established, and would ensure there is not piecemeal development along the other boundaries.
- 7.22 Therefore, we believe that that allocation of housing, both social and private, in Swatragh should be increased. The subject site (all, or any part thereof) should be brought within the settlement limits of Swatragh and zoned for housing to meet the current need.

## **8.0 Conclusions.**

- 8.1 MKA Planning Ltd support the ambition and drive of Mid Ulster District Council, in terms of its vision for the entire Council area, however, having reviewed and considered the draft Plan Strategy as issued, we consider the Plan to be unsound, principally on the basis that insufficient provision is made for the growth of Swatragh village in like with the RDS and the plan's Spatial Growth Strategy.

**Appendix MKA 1**

**MKA PLANNING LTD**  
Chartered Town Planners

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Tel: [REDACTED] [REDACTED]

**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

DRAFT PLAN STRATEGY

**Representations must be submitted by 5pm on 24<sup>th</sup> September 2020 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)**



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Post Code	BT46 5QF	BT47 6AR
Telephone Number	PLEASE CONTACT AGENT	
E-mail Address	<u>admin@mkaplanning.co.uk</u>	

**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 Please see attached submission
- (ii) Objective \_\_\_\_\_
- (iii) Growth Strategy/  
Spatial Planning Framework \_\_\_\_\_
- (iv) Policy \_\_\_\_\_
- (v) Proposals Map \_\_\_\_\_
- (vi) Site Location \_\_\_\_\_

4(a). Do you consider the development plan document (DPD) is:

Sound

Unsound





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 see attached submission

*(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 Signature]

Date:

24/9/20

*Orkla Scanning Ltd*



**RTPI**

mediation of space · making of place

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