

**Elaine Mullin**

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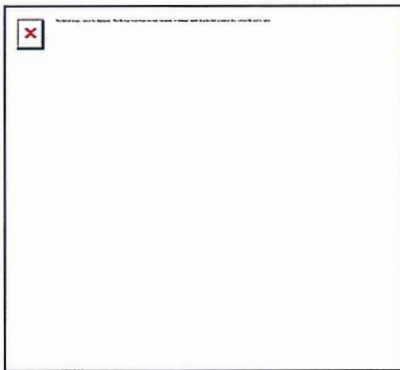
**From:** Declan Owens <[REDACTED]>  
**Sent:** 18 April 2019 17:35  
**To:** DevelopmentPlan@midulstercouncil.org  
**Cc:** shane casey  
**Subject:** DPD Representation - Mr Shane Casey (Granville)  
**Attachments:** Representation-Form SC.pdf; Location Plan 01.jpg

Dear Madam/Sir,

Please see attached Representation, by Mr Shane Casey, on the draft Plan Strategy. I would be obliged if you could confirm receipt of same. Many thanks.

Regards,  
Declan

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**Declan Owens MIPI**  
**Planning & Environment Partner**

T: [REDACTED] | M: [REDACTED]

E: [REDACTED] |

W: [www.cd-consulting.co.uk](http://www.cd-consulting.co.uk)



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**Be GREEN, keep it on the SCREEN**

## 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 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	120 Ballygawley Road	75 Creagh Road
Line 2	Eskragh	Tempo
Line 3	Dungannon	Co. Fermanagh
Line 4		
Post Code	BT70 1TA	BT94 7FZ
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	

**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 4.14
- (ii) Objective \_\_\_\_\_
- (iii) Growth Strategy/  
Spatial Planning Framework SPF 2
- (iv) Policy \_\_\_\_\_
- (v) Proposals Map Detailed Map 1.2
- (vi) Site Location Granville

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.

CE 2

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:

Response from Mr Shane Casey:

#### Strategy and Allocation

Mr Casey is of the opinion that the draft Plan Strategy falls short in meeting this requirement for soundness. The Economic Development Zones which have been allocated to Granville, are insufficient to accommodate the level of demand and growth which will be required over the plan period.

The draft Plan Strategy has identified that there is a shortage of economic development land in Dungannon and has provided for an additional 'interim' offering of land (in Dungannon North and Granville) to provide this use in the period leading up to the introduction of the Local Policies Plan. The Granville lands, as identified on Map 1.2, and more specifically zoning D-Econ4 is located to the North West of the existing Granville Industrial Estate and to the South East of Mr Casey's land holding. Indeed the D-Econ4 zoning abuts Mr Casey's land to the immediate south west. As a result of this zoning it is likely that in the coming years the industrial development at Granville will come closer to Mr Casey's living environment and this in itself presents an unsustainable domestic circumstance.

The demand for industrial land at Granville has been identified in the Industrial Land Monitor Update which was prepared at the Preferred Options stage and was relevant at the Plan Strategy production stage. The ILM shows that in Dungannon as a whole, around 40% of industrial lands (as zoned in the Dungannon and South Tyrone Area Plan 2010) have been developed (2018), however in Granville 23.55ha of the 40.15ha zoned for industrial use has been developed (59%), showing a higher than average uptake for industrial use. This is most likely attributable to the fact that Invest NI have an interest in these lands – but it does outline a higher than average demand for industrial grade lands at Granville. It is also worth noting that although some land remains undeveloped at Granville, the majority of the land has been committed to an end user.

Mr Casey puts forward the argument that the lands to the immediate rear of his home, and to the immediate north west of Zone D-Econ4 (as annotated on the attached Location Plan 01) should be included within this 'interim' zoning. The evidence which has been presented by the Council in the suite of documents to accompany the Preferred Options Paper and the draft Plan Strategy, to which this representation relates, all point to the fact that there is insufficient space to accommodate the growing industrial land uptake at Granville. The inclusion of Mr Casey's lands would help accommodate this whilst also being more in keeping with the information coming from the Council's evidence base. To include this land in the interim offering would help the draft Plan Strategy meet the CE2 test of soundness by providing a realistic and appropriate allocation.



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.

Response by Mr Shane Casey:  
Strategy and Allocation  
The Preferred Options Paper (POP) for the Mid Ulster Area outlined the Council's preferred approach for the allocation of economic development lands in the LDP. The preferred option was Option 1 which would provide each of the towns (Cookstown, Dungannon, and Magherafelt) an equal share of economic development land aiming to provide around 55-60 hectares minimum in each town. Whilst this may, in theory, appear beneficial and proportionate, there is another side to this which should be examined. The POP identifies that whilst on the surface there appears to be a large supply of zoned industrial land for uptake and sufficient to provide the necessary jobs, this masks a market failure. Uptake has been small primarily due to land owners not releasing land for industrial development. Where accessible serviced sites have been provided up take has been high in the case of Invest NI's Granville Industrial and Business Park. This is an existing serviced site and the occupation figures show a clear appetite within the local economy to avail of the facilities they have on offer. Once again this points to the fact that restricting the potential for further growth at this location would be to the detriment to the wider area, and re-allocating this type of land use to other 'new' sites does not work.  
In order to make the DPD sound and to conform with CE2, the draft Plan Strategy should include the area to the North West of the proposed D-Econ4 zone, marked red in the attached Location Map, as opposed to (or in addition to) other lands which have been identified which, for the reasons documented, would be unsustainable. The inclusion of these lands as economic development lands would be a much more logical approach and is supported by a firm evidence base – see Response Sheet 1.  
Mr Casey would also like to note that he has invested a lot, personally, to obtain his own property and manage/maintain it accordingly. As the threat of the industrial estate at Granville becomes even bigger (and closer), he, at some point may be forced to move away from this area. At this point in time Mr Casey is engaging with Environmental Health Officers from the Council re: odour and noise emanating from the existing industrial estate and the effect that is currently having on his ability to enjoy his home.

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:

18/04/2019



# Location Plan 01

Mr Shane Casey

