

# O'Callaghan PLANNING

Adding Value Through Quality Design

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

23<sup>rd</sup> September 2020

Dear Sir / Madam,

## Local Development Plan 2030 – Draft Plan Strategy - Representation

I refer to the above-mentioned Draft Plan Strategy and to your invitation for the submission of representations as part of the public consultation process.

We wish to make the following comments on behalf of:

<b>Company Name</b>	Barrack Hill Quarries
<b>Contact</b>	C/o O'Callaghan Planning
<b>Address</b>	Unit 1, 10 Monaghan Court, Monaghan Street, Newry



Federation of Small Businesses  
The UK's Leading Business Organisation

 /Ocallaghanplanning



# O'Callaghan PLANNING

Adding Value Through Quality Design

O'Callaghan  
PLANNING  
Adding Value Through Quality Design

[www.ocallaghanplanning.co.uk](http://www.ocallaghanplanning.co.uk)



Our comments in relation to the Draft Plan Strategy relate to the following:

			Sound / Unsound
(i)	Paragraph	4.11	Unsound
		4.17	Unsound
		4.20	Unsound
		4.23	Unsound
		4.37	Unsound
(ii)	Objective		
(iii)	Growth Strategy / Spatial Planning Framework	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.	Unsound
		SPF 3 - Consolidate the role of the local towns of Coalisland and Maghera as service centres for their hinterlands providing appropriate development opportunities for housing, employment and leisure activities, in keeping with the scale and character of these settlements.	Unsound
(iv)	Policy	ECON 2C	Unsound
		ECON 3	Unsound
(v)	Proposals Map	Map 1.4	Sound
(vi)	Site Location		

Having regard to Development Plan Practice Note 6, we consider the following test(s) have not been met

Issue	Soundness Test (No.)	Reason for unsoundness
Para. 4.11	C4, CE4	This growth strategy ignores the potential growth that is likely at Coalisland, for example, due to a major planning approval granted at The Clay Pits.
SPF 2	C4, CE4	The Plan proposes to focus growth in the 3 main towns. This could be to the detriment of smaller settlements in the Plan area.
Para. 4.17	C4, CE4	The Plan ignores sites that have a relevant planning history or with other key attributes that would indicate they will be available for development ahead of other sites.
SPF 3	C4, CE4	Providing appropriate opportunities for employment, housing and leisure activities could be prohibitive if the scale and character of Coalisland in particular has to be respected.
Para. 4.20	C4, CE4	Development at other major sites is not taken into consideration.
Para. 4.23	C4, CE4	Housing allocation should not be proportionate to the number of households alone, because this would not take account of significant employment opportunities that will be delivered through the new Mixed-Use Zoning at The Clay Pits. This zoning will generate additional employment, which will need to be supported by additional housing.
Para. 4.37	C4, CE4	The strategy appears not to provide for flexibility, in particular at other locations in the District that have comparable attributes to those selected.
ECON 2C	C4, CE4	Does not provide for economic development at new Mixed-Use Zoning.
ECON 3	C4, CE4	Change of use of economic land in settlements is only permitted where there are environmental benefits. This infers that no other benefit can be used to justify the release of such land.

In addition to the foregoing we believe the following aspects of the DPD are sound and our comments are set out accordingly

Issue	Soundness Test (No.)	Reason for support
Map 1.4 Opportunity Site for Recreation with Supporting Economic Mixed-Use Development	CE2, CE4	This Zoning is supported owing to the committed planning approval on the site. Whereas the approved scheme appeared to flounder owing to lack of capital, the site has now changed hands and the new owner is committed to the substantial redevelopment of the said lands. Without the prospect of future development potential there will be no incentive to remedy the current blight that detracts from the local landscape or to fill in the (dangerous) ponds.
Map 1.4	CE4	This map proposal is supported owing to the development potential on this site, as evidenced by the recent planning permission granted. The proposal is to be supported because of the significance of the remedial works required to be undertaken and because of the opportunity to improve the character and appearance of this locality, while the promise of substantial recreational, economic and employment benefits to the wider local community has to be exploited. If the zoning is to be fulfilled to its truest potential some allowance needs to be made for complimentary activities, including a residential element.



Whereas we consider the DPD to be unsound, we believe that it could be made sound if account was taken of the following:

Issue	Suggested amendments
Para. 4.11	To include Coalisland within these designations owing to the significant development potential at the proposed new Opportunity Site.
SPF 2	To allow for appropriate growth of all settlements across the Plan area, particularly Coalisland owing to the Opportunity Site proposed at the former Clay Pits.
Para. 4.17	To prioritise sites that have a relevant planning history.  To reduce the weighting to be given to sites where there has been no previous attempt to development land.
SPF 3	To allow flexibility, in respect of the proposed Mixed-Use Opportunity Site at Coalisland. Development on this site may not necessarily respect the scale and character of the settlement of Coalisland, because the costs of remediating the site need to be taken into consideration.
Para. 4.20	To allow flexibility for major growth at Coalisland, owing to the Opportunity Site proposed adjacent to its existing development limit.
Para. 4.23	In acknowledgement of the additional employment opportunities to be created, additional flexibility should be given for increased households in Coalisland. The level of growth there should not necessarily be proportionate to the number of households.
Para. 4.37	To give consideration for a Rural Industry Policy Area at Ballynakilly.
ECON 2C	To allow for development at the proposed Opportunity Site for Recreation with Supporting Economic Mixed-Use Development at Coalisland.
ECON 3	Permit the change of use of industrial land in settlement limits where there is no need to protect it for employment purposes and / or redevelopment would result in environmental and / or economic benefits.

Whereas we are seeking a change to the DPD, we would be grateful if our representation can be dealt with by

Written Representation

Oral Hearing

Signed

Position

Date

