

**ANNEX B – Response Pro-forma**

**Name: CONOR COCHRANE**

**Address: 5 Oxford Street, Belfast, BT1 3LA**

**Original Representation Reference Number: MUDPS/49 (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- c) I confirm that I wish for my original representation to be withdrawn and that I no longer wish to make a representation.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:** .....16/03/2020.....

If you require assistance when completing the above, please contact [developmentplan@midulstercouncil.org](mailto: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.**

5 Oxford Street, Belfast BT1 3LA  
t | 028 9043 4393  
e | enquiries@clydeshanks.com  
clydeshanks.com

CLYDE SHANKS

Planning Development

Planning LDP Team  
Mid-Ulster Council Offices  
50 Ballyronan Road  
Magherafelt  
BT45 6EN

**BY E-MAIL**16<sup>th</sup> April 2019

Our Ref: Matter 22

E [REDACTED]

Dear Sir/Madam,

**REPRESENTATION TO LOCAL DEVELOPMENT PLAN - LANDS AT DERRYVALE ROAD, COALISLAND****MID ULSTER DISTRICT COUNCIL****MUPOP/217**

We write on behalf of our client Sydney Brown & Sons Ltd, in relation to the Council's recently published draft Plan Strategy. This letter relates to the strategic theme of housing, and provides commentary on our client's lands currently zoned for Phase 2 housing land west of Coalisland along the Derryvale road. We have also for completeness attached a copy of our client's representation to the Preferred Options Paper, which was given the reference number MUPOP/217 by the Council.

**Growth Strategy and Spatial Planning Framework***Spatial Planning Framework*

We remain of the view that the framework elements SPF1 – SPF6 are in theory in accordance with the strategic direction of the RDS. However, the actual housing allocation figures articulated in Appendix 1 do not reflect a coherent strategy and in practice will not result in growth being focused within the three main towns nor will it result in a sustainable pattern of development in the countryside.

Rather, due to the equitable split of housing across the settlement hierarchy and countryside, and the very substantial over-subscribing of housing identified in large part due to existing committed developments, the proposed allocations will encourage a dispersed pattern of settlement and place undue pressure on the countryside from a landscape, environmental and infrastructure perspective.

The disconnect between the strategy and the figures in Appendix 1 is most stark in relation to the HGI. The HGI for Mid Ulster is identified as 11,000 houses pro-rata over the plan period to 2030. However, when the actual capacity of settlements and equitable split of the HGI as identified in Appendix 1 is tallied with the 40% housing in the countryside it results in a total of 19,074 dwellings. This is over 170% of the HGI.

This creates fundamental tensions between the strategy and the proposed growth/allocation that are not grappled with in the draft Plan Strategy. This substantial over-allocation would not be sustainable as previously articulated as it provides such a generous spread of housing across the settlement hierarchy there is no mechanism to direct growth to the main towns.

Whilst SPF6 states that the countryside will not be subject to an allocation of the District's HGI, this is not the case in reality. Any dwelling constructed within the District boundaries during the Plan period counts towards housing growth, irrespective of how it is characterised. If 4,300 dwellings are built in the countryside during the plan period, this is 40% of the HGI allocation whether or not the Council chooses to call it such.

It is clear that there is a need for the Council to follow through on its strategy and make difficult decisions on where to reduce growth in order to genuinely seek to achieve sustainable patterns of development. In our view this must start with a significant reduction in housing allocated to the countryside, and that this must be delivered through the provision of more restrictive area-specific or district-wide rural housing policies.

### Site Specifics

The site lies to west of the settlement of Coalisland within a discrete SDL. The site is identified as Phase 2 housing lands (CH21) as defined within the Dungannon & South Tyrone Area Plan, 2010.

Extending approx. 1.66 Ha in size, access is gained via the Derryvale Road defined by a mix of hedgerows and fencing on all boundaries with a potential housing yield of 33 dwellings.

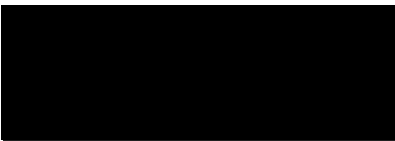
### Summary

We would respectfully request that our client's lands located off the Derryvale Road, Coalisland are promoted from Phase 2 housing lands to Phase 1 in the emerging Local Development Plan for the strategic and site-specific reasons outlined above.

We believe there is a compelling case for the lands to be zoned to assist the Council in increasing the amount of housing delivered within the wider Coalisland area.

I trust the above is helpful to the Council in progressing the draft Plan Strategy and look forward to further input as appropriate as the Plan progresses.

Yours Sincerely,



Conor Cochrane  
Senior Planner

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e | enquiries@clydeshanks.com  
clydeshanks.com

**CLYDE SHANKS**

Planning Development

Cc. Sydney Brown & Sons Ltd.  
Encs. MUPOP/217





## Preferred Options Paper Representation Form

Ref:
Date Received:
(For official use only)

*This form can be used to submit your representation to the Preferred Options Paper. Representations can also be made in writing or via email to the address detailed at the end of this form.*

### SECTION A

1. Personal Details      2. Agent Details

Title	Sydney Brown & Son Ltd.	Clyde Shanks
First Name	C/O Agent	Matthew
Last Name	-	Doak
Job Title (where relevant)	-	Planner
Organisation (where relevant)	-	Clyde Shanks
Address Line 1	-	5 Oxford Street
Line 2	-	Belfast
Line 3	-	-
Line 4	-	-
Postcode	-	BT1 3LA
Telephone Number	-	[REDACTED]
Email Address	-	[REDACTED]

### SECTION B

**Your comments should be set out in full. This will help the Council understand the issues you raise to inform the preparation of the Local Development Plan.**

2. To which part of the POP does your representation relate?

- (i) Page Number (s) – 22 to 24, 130 to 131 and 140
- (ii) Subject (s) – Housing Growth [Coalisland]
- (iii) Policy Ref (s) – see ‘Option 1’ on page 131
- (iv) Map Name (s) – Coalisland Settlement Development Limit (page131)

## **A. Introduction**

Sydney Brown and Son Ltd. own/control lands west of the town zoned for housing Phase 2 (CH21) located on Derryvale Road, Coalisland.

## **B. Purpose**

Promote land from Phase II to Phase I housing lands within the SDL of Coalisland.

Please read this site specific representation along with Clyde Shanks strategic representation regarding the preferred housing growth option.

## **C. Settlement Matters**

The landowner acknowledges that this first stage of the LDP relates to 'strategic' issues but that MU Council has welcomed site specific representations now.

They further acknowledge that the Council have a stated preferred option for zoning housing land, option 1, which promotes a 'equitable split' between settlements to ensure that towns provide at least 27% of new housing while the rural area should not exceed a maximum of 40% of the dwellings. The conclusion of this preferred option is that no additional land is needed in the hubs given extant commitments/zonings exceed the suggested allocation deriving from the Housing Growth Indicators (2012) prepared by Dfl.

## **D. Site Specific Matters**

Notwithstanding the strategic issue, the following sets out the high level merits of the land.

Lands bounding the site to the south/west has been developed and therefore this site is deemed a clear 'rounding off' opportunity.

See attached environmental matrix setting out site context/characteristics – Annex 1. In terms of protective designations (built heritage and flood risk) see Annex 2 for exhibits.

Signature:  on behalf of Clyde Shanks      Date: 25 January 2017

You are encouraged to provide your comments via email to the following email address:  
[DevelopmentPlan@midulstercouncil.org](mailto:DevelopmentPlan@midulstercouncil.org)

Or to the following postal address:  
Dr Chris Boomer  
Mid Ulster Area Planning Manager  
Magherafelt Council Office  
50 Ballyronan Road  
Magherafelt  
Co L Derry  
BT45 6EN

**CLOSING DATE FOR REPRESENTATIONS NO LATER THAN 5.00pm ON FRIDAY 27<sup>TH</sup> JANUARY 2017**

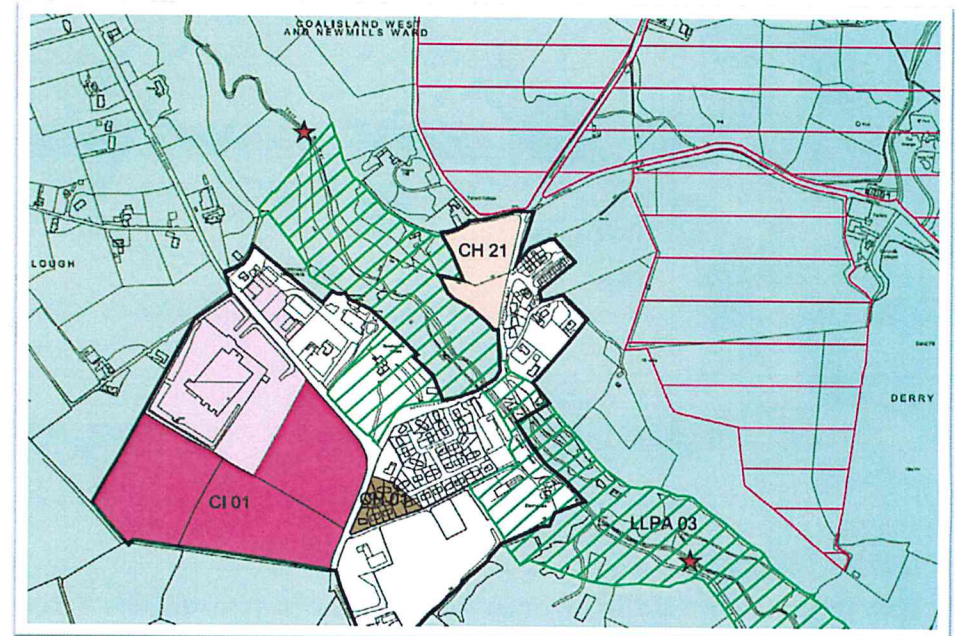
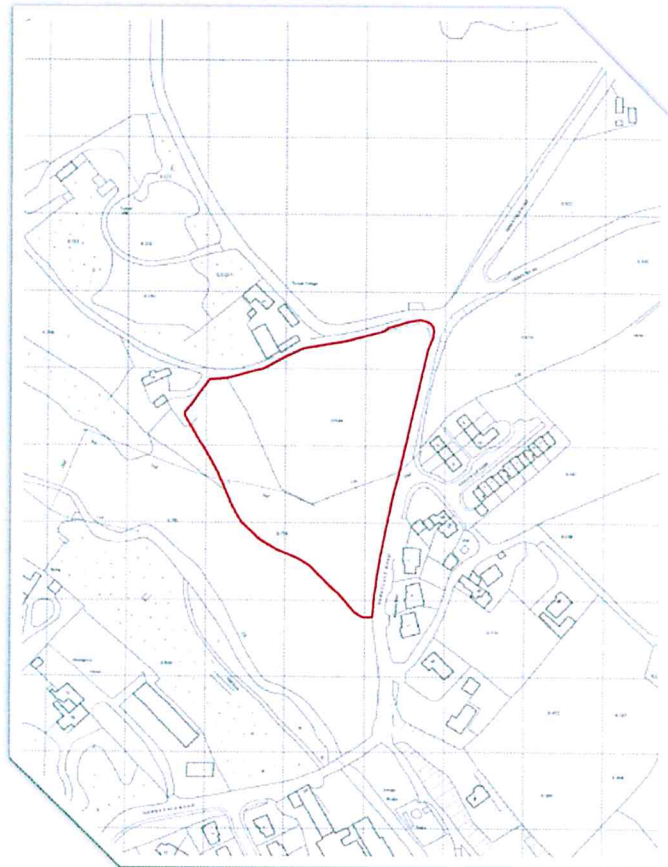
ANNEX 1 – SITE CONTEXT PLAN / ENVIRONMENTAL MATRIX



# DEVELOPMENT PLAN REPRESENTATION MAP

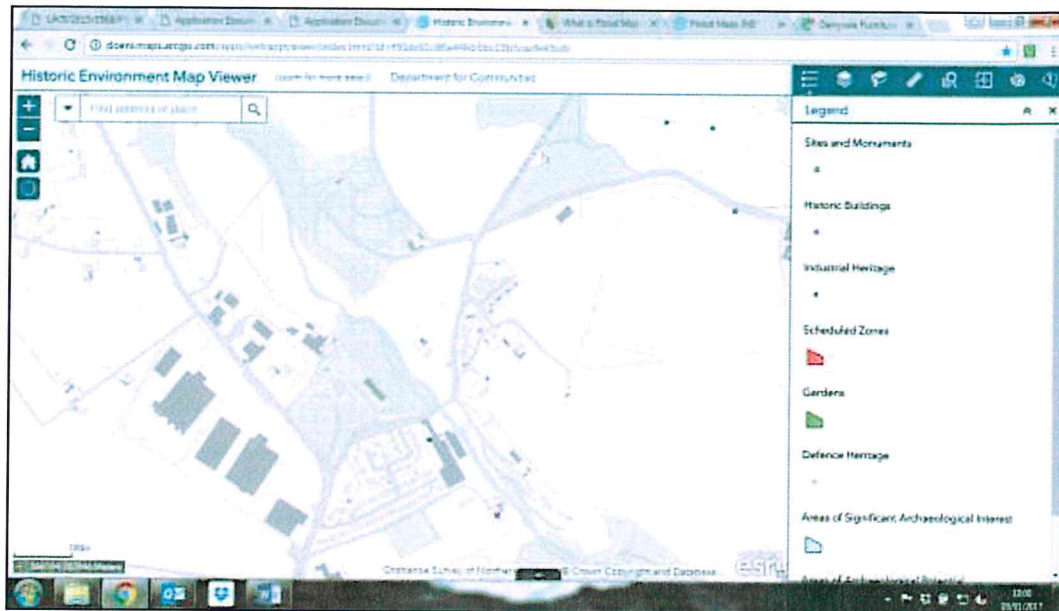
## LANDS AT DERRYVALE ROAD, COALISLAND

Site Context / Environmental Matrix	
Proposal	Development Land Opposite Existing Housing
Site Area (Edged Red)	1.66 Hectares
Access	Access via Derryvale Road
Topography	Land falls from West to East
Boundaries	Mix of Hedgerow and Fenceline to all Boundaries
Potential Yield	33 Dwellings

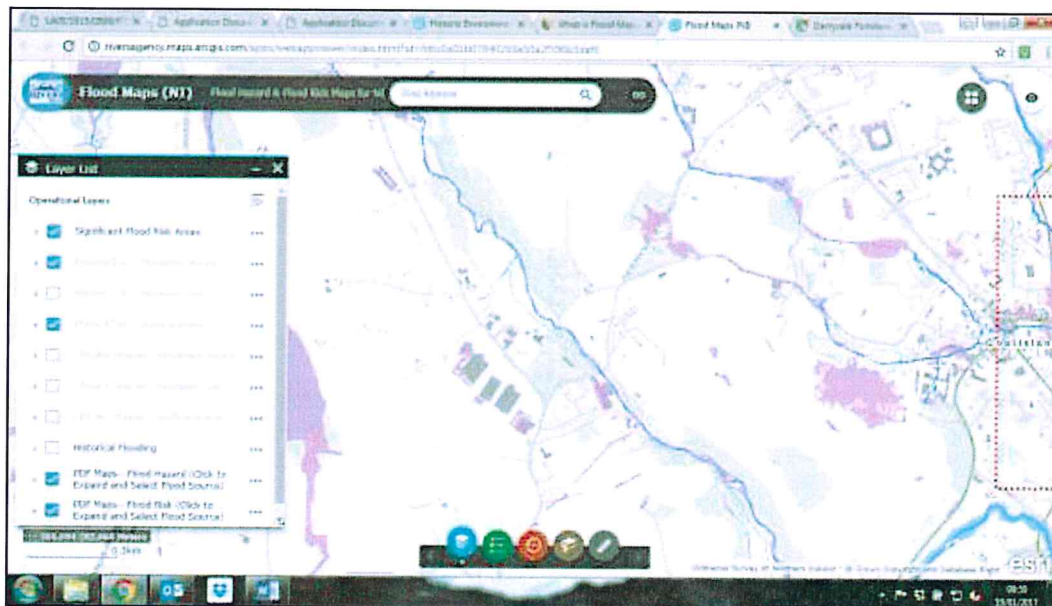




## ANNEX 2 – MAP VIEWER EXTRACTS (BUILT HERITAGE AND FLOOD RISK)



- No built heritage within site.



- Site is not affected by flooding, however, patches of high level surface water exist and a watercourse to west.