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email to dev. plan  
18/3/20

**ANNEX B – Response Pro-forma**

**Name: OONAGH GIVEN**

**Address: 10 Carnan Park, Omagh, BT79 7XA**

**Original Representation Reference Number: MUDPS/58 (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c) I confirm that I wish for my original representation to be withdrawn and that I no longer wish to make a representation.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: .....** 18 March 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.**

**Elaine Mullin**

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**From:** Planning@Midulstercouncil.org  
**Sent:** 17 April 2019 11:58  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** FW: Representation to Draft Plan Strategy  
**Attachments:** Killyman Road Proposal to LDP.doc; 001.jpg; Letter in response to Plan Strategy.doc

**From:** Oonagh Given [REDACTED]  
**Sent:** 17 April 2019 11:54  
**To:** Planning@Midulstercouncil.org  
**Subject:** Representation to Draft Plan Strategy

Good morning,

**Re. Draft Plan Strategy, Lands at Killyman Road, Dungannon**

Please see attached cover letter, written representation and site location map. Hard copy in post.

Regards,

Oonagh Given

**Case for the inclusion of Lands at Killyman Road, Dungannon to be zoned for economic development land or otherwise included within settlement limit of Dungannon as part of the Mid Ulster District Council Local Development Plan 2030.**

**Prepared by Oonagh Given Chartered Town Planner  
On behalf of Mr Henry Courtney**

**The Site Location and Context**

1. The site is approximately 1.5 miles east from the centre of Dungannon town and three miles from the village of Killyman. It directly accesses the B34 road (Killyman Road) close to where it forms a junction with Far Circular Road.
2. The site comprises a grassed field which is low lying at its southern end next to the road and which rises to form a crest to the north. Adjacent to the site to the west is a vehicle repairs garage (Donnelly's Vauxhall) and immediately to the south on the opposite side of Killyman Road is a small business park. The remaining lands immediately around the site are undeveloped.
3. The section of Killyman Road between the site and Dungannon centre is dominated by economic development, including Moy Park, on its southern side. There is some economic development on Far Circular Road near to the site; otherwise Far Circular Road is fairly undeveloped until reaching the town centre further to the west.

**The Dungannon and South Tyrone Area Plan 2010 (adopted 2005) (DSTAP)**

4. The subject lands are presently just outside of the settlement limit for Dungannon as designated by the Plan. About 100 metres to the west and south west of the subject lands are lands zoned for industry and business – zones D102 and D103.
5. The economic development adjacent to and west of the site (Donnelly's/ Vauxhall) and immediately opposite the site on Killyman Road (the business park) is outside the settlement limit.
6. There are no environmental designations on or near the site.

**The Regional Development Strategy 2035**

7. 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*.
8. 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. The site is approximately 1200 metres from the junction of the M1 and A29.

9. 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 with Dungannon being the larger of the two.

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

10. The Preferred Options Paper (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.
11. The POP presented three options for locating economic development land in Dungannon. Option 1 was for lands to the north of the settlement on Cookstown Road. Option 2 was for lands to the south east of the settlement near Killyman and Far Circular Roads. Option 3 was land to the south side of the M1 around the A29 road.

#### **Mid Ulster District Local Development Plan 2030 Draft Plan Strategy**

12. The Council predicts that the district will have to provide 8,500 jobs over the plan period which will require 170 hectares of land zoned across Cookstown, Dungannon and Magherafelt. It proposes an equitable split of 55 – 60 hectares per town. It is not apparent from the Plan Strategy why it has been decided that the economic development allocation be divided equally.
13. According to the Strategy the economic development land will be provided at a "*variety of locations suitable for a mixture of uses*" (page 116).
14. The Council considered there to be a shortage of economic development lands in Dungannon and accordingly has zoned land at two sites on the Cookstown Road - D ECON 6 and D ECON 7 (Option 1 from the Preferred Options Paper), which comprise a total of 16.95 hectares. Economic development land has also been zoned at Granville in recognition of the shortage in Dungannon.
15. The Draft Plan Strategy confirms that the provision of the above supplies at Dungannon and Granville, does not intend to replace further consideration of economic development zonings as that is an issue for the Local Polices Plan.
16. According to paragraph 12.6 of the Plan Strategy the RDS supports development being focuses on "*the three main hubs*".
17. 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; Magherafelt however is defined by the RDS as a *Local Hub*.

18. Magherafelt does not have the same status as Cookstown or Dungannon within the context of the RDS.

#### **The case for further economic development lands at Dungannon**

19. Dungannon is located around 500 metres from the junction of the A29 (Mid Ulster Spine) and the M1.
20. Given its position relative to two significant transport routes, Dungannon is well placed as a departure point for access to Belfast, the West, Dublin and the Republic of Ireland.
21. Dungannon is the largest town in Mid Ulster District and one of 15 towns in Northern Ireland designated as *main hubs* by the Regional Development Strategy 2015. The only other *main hub* with the district is Cookstown, whereas Magherafelt is a *local hub*.
22. The population in Dungannon (14,322 at 2011 census) is more than one and a half times that of Magherafelt (8,819 at 2011 census).
23. In the POP the Council acknowledges that Dungannon has a strong industrial and engineering ethos, with the food manufacturing sector providing a significant amount of employment. It notes the increase in population between the 2001 and 2011 census (29%) as being in response to an increase in migrant labour to the town and that this population growth is well in excess of that experienced in Magherafelt and Cookstown.
24. The draft Plan Strategy sees the district as “*retaining its role as a key industrial centre outside of Belfast with a strong engineering and agri-food base*” (paragraph 3.3 of page 29).
25. Taking into account all of the above, it stands to reason that Dungannon is likely to continue to be attractive as a location for engineering and the food manufacturing sectors. Out of the 170 hectares of land to be zoned for economic development, the total allocated to Dungannon should be proportionate to the status, size and character of the town, and accordingly additional land should be zoned in Dungannon as part of the Local Policies Plan.

#### **The case for zoning economic development land at the site at Killyman Road**

26. The Mid Ulster District Preferred Options Paper presented three options for locating economic development land in Dungannon. Option 1 was for lands to the north of the settlement on Cookstown Road which have now been zoned as part of the Draft Plan Strategy.

27. Option 2 was for lands to the south east of the settlement near Killyman and Far Circular Roads. Option 3 was land to the south side of the M1 around the A29 road.
28. The case in support of the subject site is made having regard to a number of planning considerations as set out below and by comparing it to the other options where applicable.

Protection of designated sites

29. There are no designated sites or monuments on or around the site, whereas there is an unscheduled monument in the vicinity of the lands at Option 3.

SPF 1 of the Draft Plan Strategy– Settlement limits to provide compact urban forms and to protect the setting of individual settlements

30. Development of the subject site will maintain a compact urban form and will not undermine the setting of Dungannon. It is bounded by existing economic development uses to the west and south.
31. Adjacent to the site on its western boundary and elevated above Killyman Road is a vehicle repair garage for Donnelly's (Vauxhall) vehicle sales. South of the site on the opposite side of Killyman Road is a business park comprising around three separate units. This business park and existing development on Killyman Road including the Donnelly's garage help to frame views of the site on approach from Far Circular Road and in near views from Killyman Road.
32. Approaching Dungannon from Killyman village views of the site are restricted given road geometry, roadside vegetation and a large out building. The site does not contribute to the setting of Dungannon when seen on this approach.
33. Option 3 shows expansion into the area on the southern side of the M1. Development of these lands, which are isolated from the existing settlement limit and urban footprint of Dungannon, would create a node of development outside of Dungannon town and are less likely to contribute to aims of SPF1.

Residential Amenity

34. 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.

35. Development within the vicinity of the site is predominantly economic development land with some detached residences along Killyman Road. The site is capable of accommodating a range of economic development uses without impacting on residential amenity and complements the existing economic uses in the area already.

#### Economic Policies of the Draft Plan Strategy

36. According to the draft Plan Strategy land will be zoned for economic development in a variety of locations (paragraph 12.10 of page 116). The Strategy has zoned land for economic development at the northern edge of Dungannon. The subject site is at the southern/ south eastern edge of Dungannon. Inclusion of the subject site in lands for economic development would contribute to a balanced approach to economic development across Dungannon.

#### Proximity to Transport Corridors

37. 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*.

38. 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. The site at Killyman Road is approximately 1200 metres from the junction of these two significant transport routes and is well placed for providing access to the West, Republic of Ireland, and Belfast. Its proximity and ease of access to *both* of these important transport routes sets it apart from other options for economic expansion.

# ACemap® Single

Printed: 10/04/2019 Customer Ref: 2018/020/HC

Centre Point (Easting, Northing): 282318, 361472

Lands at Killyman Road, Dungannon

Scale: 1:5,000

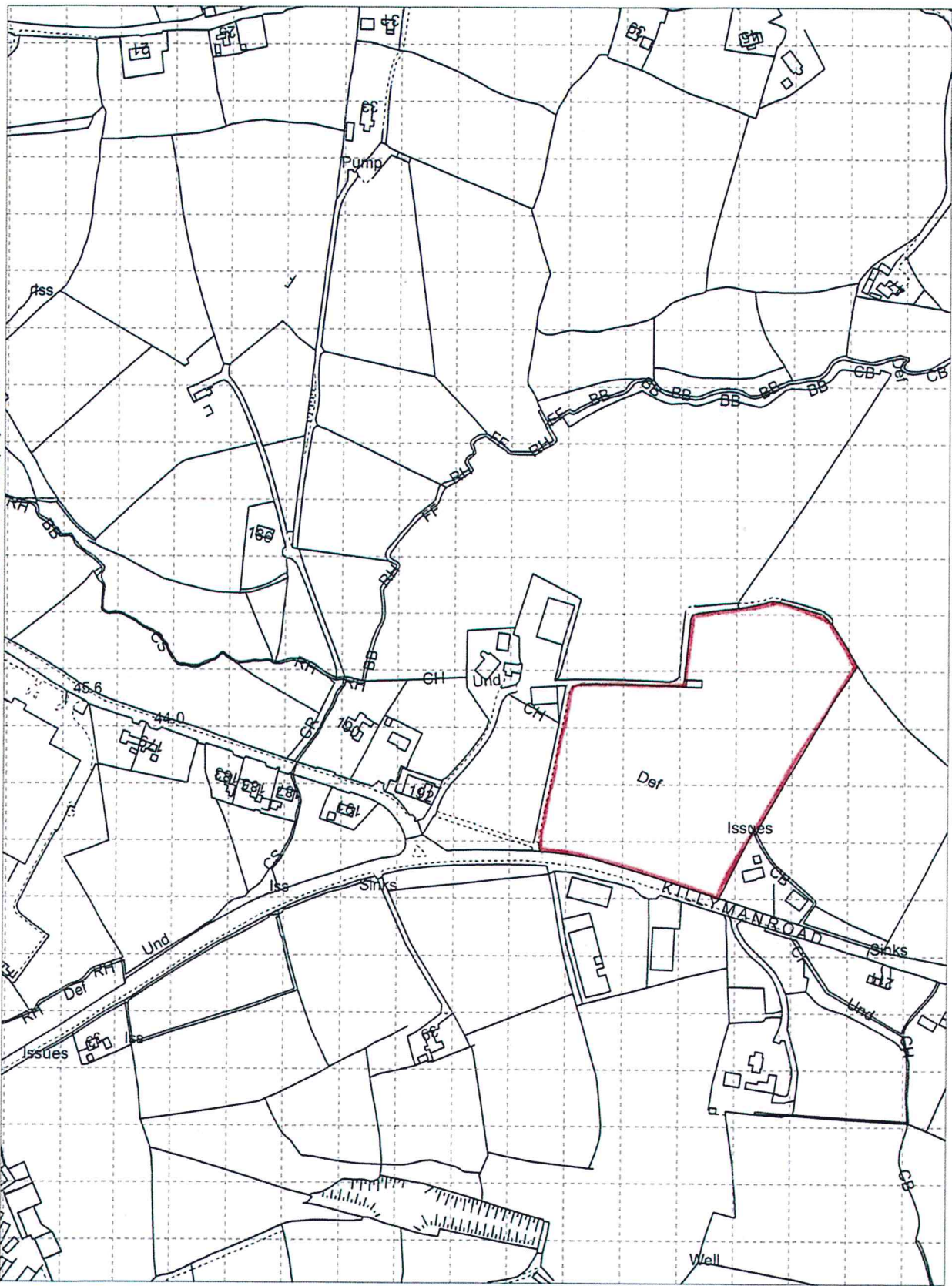
Order no. ORD69017

Plan No. 16016SW

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## OONAGH GIVEN CHARTERED TOWN PLANNER

10 Carnan Park, Strathroy, Omagh County Tyrone BT9 7XA

Mobile: [REDACTED]

E mail: [REDACTED]

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

17 April 2019

Dear Ms McEvoy,

### **Representation to Local Development Plan with respect to lands at Killyman Road, Dungannon for Economic Development and Response to Draft Plan Strategy with respect to Allocation of Economic Development Land in Mid Ulster**

Please see attached representation for the inclusion of lands for economic development at Killyman Road Dungannon. I appreciate that this may be considered as part of the Local Policies Plan.

In relation to the attached representation I would like to make the following comments with respect to the "soundness" of the Draft Plan Strategy,

According to paragraph 12.6 of the Plan Strategy the RDS supports development being focuses on "the three main hubs". What are the "three main hubs" that are being referred to? Note 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; Magherafelt however is a *Local Hub*.

Magherafelt does not have the same status as Cookstown or Dungannon within the context of the RDS. However it appears from paragraph 12.6 of the Strategy, that Magherafelt has been interpreted as having the same status as Cookstown and Dungannon, and that this *may* have informed the decision to allocate the same amount of economic land to each of these towns. If that is the case then Council has not correctly taken account of the RDS in this particular regard. I would ask the Council to consider this point as it may result in a redistribution of the economic development land allocation within the district and a greater allocation of economic development land to Dungannon than originally envisaged.

Yours sincerely,

Oonagh Given

