

**Colin Mckeown**

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**From:** DevelopmentPlan@midulstercouncil.org  
**Sent:** 21 April 2020 11:27  
**To:** Colin Mckeown  
**Subject:** FW: draft Plan Strategy re-consultation

**From:** [REDACTED]  
**Sent:** 21 April 2020 09:44  
**To:** Sinead McEvoy [REDACTED]  
**Cc:** DevelopmentPlan@midulstercouncil.org  
**Subject:** RE: draft Plan Strategy re-consultation

Morning Sinead, good to hear from you and trust you're keeping well also.

Thanks for the clarification. On that basis, our original submissions will not change and please consider our previous submissions as our final ones. For clarity, these are referenced below.

<u>POP</u>	<u>dPS</u>
MUPOP/18;	MUDPS/98;
MUPOP/20;	MUDPS/99.
MUPOP/21;	
MUPOP/109;	
MUPOP/112;	
MUPOP/124;	
MUPOP/270;	
MUPOP/274;	
MUPOP/275;	
MUPOP/277;	
MUPOP/354.	

Thanks.



**CHRIS BRYSON** MRTPI AssocRICS  
Director, Planning

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**Michael McGibbon**

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**From:** Helena McDonnell <[REDACTED]>  
**Sent:** 18 April 2019 17:04  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** Draft Plan Strategy Response - Killeen (Job No. C03648)

Further to my email below, due to the large nature of the previous file sent, please find below a dropbox link our submission for lands located in Killeen.

[REDACTED]



**HELENA MCDONNELL**

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**From:** Helena McDonnell  
**Sent:** 18 April 2019 16:59  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** Draft Plan Strategy Response - Killeen (Job No. C03648)

Dear Sir/Madam

Please find attached our response to the Mid Ulster Draft Plan Strategy on behalf of our client Western Building Systems we have also sent a hard copy in the post.

I would appreciate if you could confirm that you have received this representation.

Should you require any further information please do not hesitate to contact Gravis Planning



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**BY EMAIL & POST**

18 April 2019

Our Ref: C03510  
POP Ref: MUPOP/21

Development Plan Team,  
Planning Department, Mid Ulster District Council,  
50 Ballyronan Road,  
Magherafelt,  
BT45 6EN

Dear Sir/Madam,

**Re: Response to the Mid Ulster District Council Draft Plan Strategy (DPS) – Lands located at to the south of Mountjoy Road, Killeen**

This letter is submitted on behalf of our client, Western Building Systems, and relates to the publication of the Draft Plan Strategy (DPS), the second stage in Mid Ulster District Council's Local Development Plan process. It highlights how some draft policies are not sound and proposes how such policies could be amended to become sound. In addition to this we draw your attention to specific lands that we have identified as being suitable for inclusion within the development limit of Killeen.

Development Plan Practice Note 6 sets out 3 main tests of soundness for Local Development Plans, with each test having a number of criteria, as follows:

Procedural Tests

- P1 Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?*
- P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?*
- P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?*
- P4 Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?*

Consistency Tests

- C1 Did the council take account of the Regional Development Strategy?*
- C2 Did the council take account of its Community Plan?*
- C3 Did the council take account of policy and guidance issued by the Department?*
- C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?*

Coherence and Effectiveness Tests

- CE1 *The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;*
- CE2 *The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;*
- CE3 *There are clear mechanisms for implementation and monitoring; and*
- CE4 *It is reasonably flexible to enable it to deal with changing circumstances.*

**MID ULSTER’S SPATIAL PLANNING FRAMEWORK**

A Strategic Planning Framework for the Plan was formulated by the Council to support and achieve the Plan Objective as set out on p30-31. The council sets out 17 Plan Strategy Objectives broken up into three broad categories:

- Accommodating People and Creating Places
- Creating jobs and promoting prosperity
- Enhancing the environment and improving infrastructure

A Spatial Planning Framework has been formulated to accord with them. We are generally supportive of the majority of the SPF’s, with the exception of those as discussed below.

**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;**

We generally support and agree that growth should be based on sustainable patterns of development and managed and balanced across Mid Ulster, however we do not agree with the restructured settlement hierarchy as shown on page 37 of the Draft Plan Strategy.

	Skills	Health	Social	Environment	Commercial	Justice	Productive	Networks
Towns: the main administrative, trade employment and residential centres which provide appropriate development opportunities for housing, employment and leisure activities appropriate to their scale and character. (SPG2 & SPG 3)	Further Education, Special Schools, Library, Post Primary	Minor Injuries, Out Patients, Pharmacy Health Centres, Day-care Centres	Leisure Centre, Visitor Centre, Arts & Culture Centres, Community Centre, Sports facility, Welfare Services	Recycling, Renewables, Water & Sewers Supply/ Treatment plants, waste-landfill, waste - recycle	Shopping centres, Retail warehousing, Range of Restaurants, Supermarket, Restaurants, Mix of retail facilities	Police Station/ District, County Courts, Probation Service	Industrial Park, Tourism Office, Enterprise Centre, Information Office	Major Roads, Bus/Rail, Park N’ Ride, Cycle Network, Link Corridors/Trunk Roads, Bus/Rail to larger centres
Villages: Local service centres which provide opportunities for housing, employment and leisure activities appropriate to their scale and character. (SPG4)	Nursery, Primary School	Doctor, Ambulance Outreach Services	Local Halls, Play Areas	Access to clean water Sewage disposal	Shop, Pub, Post Office, Petrol Station	Neighbourhood Watch	Workshop/ Business Unit	Local Roads, Broadband, Urban Street Lighting, Local Bus, Cycle
Small Settlements: provide development opportunities appropriate to their size and scale, allowing for single houses and small groups of up to 6 houses. (SPG5)	Small Settlements may contain only a limited amount of infrastructure at a smaller scale than that contained above in the village’s category.							

Table 1: Hierarchy of Settlements and related Infrastructure

Table 1 provides a summary of the scale of development appropriate to each tier of the settlement hierarchy. As stipulated by Table 1, it states that **small settlements provide development opportunities appropriate to their size and scale allowing for single houses and a small group of up to 6 houses**. A total number of 33 units have been identified in the preferred option paper and the draft plan strategy, as being required to accommodate growth within Killeen over the next plan period, which is identified as a small settlement within the settlement hierarchy. This is in direct conflict with the number of units that the Spatial Framework Plan states is appropriate for a small settlement. Therefore based on this analysis Killeen should either be re-designated as a village as per its previous designation within the Dungannon and South 2010 or the restrictive development opportunities for small settlements should be removed to allow for appropriate growth reflective of the size and scale of the settlement.

<b>Main Towns (Hubs)</b>	Cookstown Dungannon Magherafelt			
<b>Local Towns</b>	Maghera Coalisland			
<b>Villages</b>	Aghaginduff/ Cabragh Annaghmore Ardboe Augher Aughnacloy Ballinderry Ballygawley Ballylifford Ballynakilly Ballyronan The Bush Bellaghy Benburb	Brockagh/ Mountjoy Caledon Cappagh Castlecaulfield Clogher Castledawson Churchtown Clady Coagh Creagh Desertmartin Donaghmore	Draperstown Drummullan Edendork Eglish Fivemiletown Galbally Granville Gulladuff Killyman The Loup Moneymore Moortown	Moy Newmills Orritor Pomeroy The Rock Sandholes Stewartstown Swatragh Tamnamore Tobermore Upperlands
<b>Small Settlements</b>	Aghamullan/ Derryloughan* Ardtree Ballymaguigan Ballynease Culnady Curran Carland Carnteel Dernagh / Clonoe	Derrytresk* Desertcreat Donaghey Drapersfield Dunnamore Dunman Dyan Glen	Glenone Gortacladdy Gracefield Grange Inishrush Killeen Killeenan Kilross Knockloughrim	Longfield Moneyneay Straw Tamlaght Tullyhogue Tullywiggan* Tullyallen/ Edencrannon* The Woods

Table 2: Settlement Hierarchy Classification

#### Soundness Test

- CE2 – The restrictive scope for development within small settlements is not realistic and appropriate for certain small settlements and is contrary to findings within the Preferred Options Paper and is therefore not founded on a robust evidence base.

Remedy

- Re-designate Killeen as a village as per its previous designation within the Dungannon and South 2010 or remove the restrictive development opportunities for small settlements to allow for appropriate growth reflective of the size and scale of the settlement.

## **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;**

Spatial Planning Framework 2 is in direct conflict with Spatial Planning Framework 1 which stipulates *that growth should be managed on sustainable patterns of development balanced across Mid Ulster*. The Council now plans to focus growth within the three Main Towns of Cookstown, Dungannon and Magherafelt.

Their vision is that Cookstown, Dungannon and Magherafelt act as the key centres of growth and function as a cluster of public administration and service provision. The Council state that this will assist in maintaining the vitality and viability of the centres by publically investing in improving access, attractiveness and amenity and encouraging private investment by identifying development opportunities and protecting existing retail units in the primary retail core from inappropriate uses. However this will have direct implications on small towns and settlements and have a detrimental effect on their vitality and viability as growth will be limited in these areas.

This is also in direct conflict to the preferred option for housing growth within the Preferred Options Paper where an equitable split was the preferred option. The Council states within their POP on page 24, *“if housing growth is focused primarily on the hubs there would then need to be more stricter controls on single houses in the countryside, which would have a detrimental effect on rural communities”* in addition to this the Council states that *“maintaining a strong urban focus would result in an inappropriate constraint potentially threatening the vitality and viability of the rural community.”*

We had previously highlighted in our POP representation that we supported the council’s preferred option that housing growth should be equally split between the settlements and maintain this stance, we therefore disagree that growth should be focused within the three main towns/hubs of Cookstown, Dungannon and Magherafelt and urge the Council to provide a equitable split across the settlements within the District.

The Draft Plan Strategy states that 72% of the population of the district lives in a rural area. This definition of rural means that everywhere in the District is classified as rural apart from Cookstown, Dungannon, Magerafelt and Coalisland. Therefore to focus 60% of housing growth (6569 units) within the three main hubs would be to the detriment of the majority of the rural population and have key implications on a large number of settlements in terms of the viability or vitality which could have a catastrophic impact on the district as a whole.

This focus of growth would result in more people travelling to the three main towns to access basic services, while this would help to increase the economy of the three main towns, this would have a negative impact on the remaining settlements removing much needed expenditure from local businesses that help to sustain the vitality and viability of these settlements. This would also increase the dependency on private vehicles as more people would need to travel to access services.

Added to this within the justification section for SPF 2 the Council State that **11,000 new homes will be required within Mid Ulster**. This is a 6.3% reduction in the HGI figure previously allocated to Mid Ulster for the legacy three Council Districts for the period of 2008-2025 which set out **13,300 units assigned for the area**.

Firstly it is felt that the HGI figures for Mid Ulster (9,500 from 2012-2015) on which the revised allocations are based on are flawed resulting in an under allocation of dwellings over the plan period 2015 – 2030 for the Mid Ulster District Council Area. The HGI figure produced by the Department for Regional Development (DRD) in January 2016 was calculated taking into account LPS new dwelling completion data between 2010-2015. Due to sluggish economic conditions during this period, the number of completed dwellings is strongly under representative and not a sound statistical base upon which to project new dwelling requirements for the plan period 2015 – 2030. It is felt that the previous figure of 13,300 units is a more appropriate figure to allocate to the Council Area as the previous HGI covers a period of both housing growth and recession and therefore provides a clearer indication of the likely potential growth within the district

Further to this the Council propose to create 8,500 new jobs over the plan period through the provision of at least 170 hectares of economic development land distributed equitably across the three towns at a variety of locations.

However, this figure should be revised upwards in line with the uplifted figure for housing growth as set out above.

#### Soundness Test

- The allocation of housing growth focused within the three main towns Cookstown, Dungannon and Magherafelt is not sound or reasonably flexible to deal with changing circumstance (Test CE2).
- The HGI figure on which the housing allocation is based is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) nor is it based on robust evidence (Test CE2). The projected housing growth of 11,000 homes over the plan period is not a flexible or robust figure and would not be able to respond to unexpected growth. The housing growth figure (11,000) is not based on sound evidence as previously stated in this submission and would leave a housing shortfall in the district over the life of the plan
- The creation of 8,500 jobs has been calculated based on the level of jobs required to sustain a projected housing growth of 11,000 homes over the plan period and therefore would not

be adequate to sustain growth based on 13,300 homes in the district over the plan period.

Remedy

- Provide an equitable split across the district as per the chosen preferred option within the preferred option paper.
- The housing growth figure should be revised to use the previous HGI as the base and apportion the uplift on a pro rate basis across the settlements.
- Revise job creation figure upwards in line with our suggested revised housing growth figure.

### **SPF 5 - Provide development opportunities within small settlements appropriate to their size and scale, allowing for single houses and small groups of houses;**

While we agree that development opportunities within small settlements should be appropriate to their size and scale we do not agree with the restrictive narrative of SPF 5 that states, this will only allow for single houses and small groups of houses. This part of SPF 5 should be removed and SPF should be read as follows:

*“Spatial Planning Framework 5 – Provide development opportunities within small settlements appropriate to their size and scale”.*

#### **POLICY HOU1 – PROTECTION OF LAND ZONED FOR HOUSING**

Land has been zoned as Phase 1 and Phase 2 housing land. Development of non-residential uses on land zoned for housing will conflict with the plan unless they are ancillary to the housing development and provide community or recreational uses such as health, education or a neighbourhood shop.

Development of phase 1 land for housing in line with the key site requirements will accord with the Plan.

Development of phase 2 housing land will conflict with the Plan except where:

- i) It has been re-designated as phase 1 land in Local Policies Plan or as a result of Plan review;
- ii) It is for social/affordable housing to meet an identified social housing need;
- iii) It is for a single dwelling in accordance with our policy for dwellings in the countryside;
- iv) It is to meet an overriding need for a health, education or community facility.

We **do not support** this policy and would respectfully suggest that the council remove this policy from the Draft Plan Strategy. The policy is too restrictive and inflexible. This approach could restrict the supply of suitable housing land within the towns and inflate houses prices where there is increased demand. In some cases, zoned sites may never be developed. A phased approach to the release of housing land could prevent other, more suitable and viable sites being developed in the short term. In addition, the policy wrongly assumes that all permissions will translate into the delivery of homes. We strongly object to the phasing of housing land and firmly believe that the market is best placed to decide which sites are developed first.

#### Soundness Test

- Policy HOU 1 is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) i.e. unexpected growth. The policy assumes that all permissions will be built and under this approach permissions that are not built could prevent more viable lands from being developed for housing. It also could restrict the supply of housing land and where there is strong demand this would push up house prices.

#### Remedy

- This policy should be omitted from the Draft Plan Strategy.

### **POLICY HOU2 – QUALITY RESIDENTIAL DEVELOPMENT**

New Housing development within settlements, on zoned or unzoned land will accord with the Plan where it has been demonstrated that it will provide a quality residential environment where:

- i) It creates a sense of place and avoids town cramming;
- ii) It respects neighbouring development in terms of character, separation distance and amenity and provides a quality residential environment for the future occupiers of the unit;
- iii) Provision is made for a mixture of house types and tenures providing accommodation accessible to everyone including people with disabilities;
- iv) It provides access to modes of transport other than the car and provides linkages to community facilities;
- v) It provides adequate public and private open space; and
- vi) Provision is made for local infrastructure or local neighbourhood facilities where a need is identified.

While Policy HOU2 states that provision should be made for a mixture of house types and tenures providing accommodation accessible to everyone including people with disabilities, it does not specify a threshold or unit number that will need to be provided within future developments.

However within the justification and amplification section to this policy the Council state that *“Developments of over 50 units or more on sites of 2 hectares or more, social housing should be provided at a rate of no less than 25% of the total no. of units”*.

As the above requirement is not contained within the policy wording itself, one must assume that this will not be stringently enforced. However should this statement be included within the policy, this would have potential implications for large-scale development sites. It would also be unnecessary for this statement to apply to housing schemes of 50 units or more or 2ha or more where no need exists, the council should then not expect any affordable housing provision within that scheme.

Though this phrase is designed with the aim of delivering affordable housing through the planning process, it would actually only serve to inflate the overall price of the remaining market housing within schemes. Developers would be forced to pass the burden of providing affordable housing within a scheme onto the purchasers of the remaining market housing through increased house prices, to ensure that a scheme remains viable. This, in turn, would also have implications for land values, causing price inflation and this would be to the detriment of the housing market.

If taken forward within the policy, we could see developers reducing residential development in general, resulting in fewer housing projects being brought forward and result in affordable housing not being delivered in the volume that was anticipated. This non-delivery of housing development could undermine LDP targets.

In addition to this, the insertion of this statement would also not necessarily deliver affordable housing in the locations where those in need of affordable housing would wish to live. Those seeking affordable housing will often wish to remain within the close knit community where they have grown up and where family ties are strong. The phrase in its current form would seek to provide affordable housing on a blanket basis, whether needed or not, spread across the district. There is therefore a need for a more targeted approach, based on NIHE areas of demand.

#### Soundness Test

- Policy HOU2 is unsound as the policy fails the test of CE 2 & 3 – Coherence and Effectiveness. The policy is incoherent when read in tandem with the policy justification and amplification.

#### Remedy

- Clarification is sought as to whether *“Developments of over 50 units or more on sites of 2 hectares or more, social housing should be provided at a rate of no less than 25% of the total no. of units”*.

- The policy should clearly state if there will be a threshold that will need to be met with regards to social housing. However should that threshold be met, a demonstrated need for social housing in the area should also be required to be identified.

### POLICY ECON 1 – ECONOMIC DEVELOPMENT IN SETTLEMENTS

Within towns, proposals for economic development on land zoned for such purposes will conform with the Plan, subject to meeting any Key Site Requirements. In all other cases, proposals will be determined on their individual merits.

Within villages and small settlements, proposals that are of an appropriate scale, nature and design such as compatibility with nearby residential use, will be given favourable consideration.

Within the justification and amplification section of this policy the Council stipulate that the Plan objectives, seek to have the main employment and service areas located in hubs and clusters i.e. the towns, where land will be zoned for economic development.

It is proposed by the Council that the amount of economic development land will be by in large equally split between Dungannon Cookstown and Magherafelt. **We do not agree that economic land should solely be zoned within the three main towns.**

MAIN TOWNS	APPROXIMATE NO. OF HOUSEHOLDS*	% SHARE OF ALL HOUSEHOLDS** (48,072)	% SHARE OF HGI (10,950); total of 30% - 60% apportioned based on relative proportion of all households	HOUSING LOCAL INDICATORS 2015-2030 (units)	COMMITTED UNITS STILL TO BE DEVELOPED AND RESIDUAL ZONING (at 1st April 2015)	ECONOMIC DEVELOPMENT INDICATOR (hectares)
DUNGANNON	5,386	11.2%	12% - 24%	1,314 - 2,628	2,697	60
COOKSTOWN	4,519	9.4%	10% - 21%	1,095 - 2,299	1,661	55
MAGHERAFELT	3,245	6.8%	8% - 15%	876 - 1,642	1,936	55
<b>TOTALS</b>	<b>13,150</b>	<b>27.4%</b>	<b>30% - 60%</b>	<b>3,285 - 6,569</b>	<b>6,294</b>	<b>170 hectares</b>

*Extract: Proposed Allocation of economic development land as per Table 1, Appendix 1 of the DPS page 253*

The plan identifies that many industrial and business enterprises are located in rural areas within the District (the definition of rural means that everywhere in the District is classified as rural apart from Cookstown, Dungannon, Magerafelt and Coalisland).

These businesses provide a healthy level of economic activity and facilitate investment which as a result contributes to retaining and enhancing the appeal of the settlement as a place for people to live work and visit, therefore by focusing economic growth solely within the main hubs will result in a detrimental impact on smaller settlements/villages with established businesses.

In addition to this many of these enterprises will over time need to expand and/ or diversify, the Council state that in smaller settlements, the Council will not zone land for economic development purposes because of the need to retain a degree of flexibility. However, favourable consideration

will be given to applications for industrial, business and storage or distribution uses on un-zoned land included within the settlement limit, provided the proposal is of a scale, nature and design appropriate to the character of the settlement involved and it meets the General Principles Planning Policy. It is felt that the Council should consider zoning industrial land adjacent to or in close proximity to these businesses in order to ensure a sufficient level of land will be supplied over the new plan period to sustain these rural businesses.

We feel that the appropriate approach for allocating economic land is to apportion economic land based on the population of a town and the people per hectare as per option 3 of the preferred options paper. This approach ensures sustainable growth of settlements as it directly links population growth to economic development. It also utilises established infrastructure without the need for further significant investment in new infrastructure that may be required for the Councils preferred option.

Mid Ulster Council have stipulated that based on the 2011 census 11,599 people lived in Cookstown, 14,340 people lived in Dungannon and 8,805 people lived in Magherafelt and on this basis 60ha of economic land should be allocated to Cookstown, 65-70ha for Dungannon and 40-45ha for Magherafelt, this equates to 193, 195 and 204 people per hectare of economic land respectively.

Therefore based on the minimum amount of economic lands as per option three, a total amount of 165ha economic land should be allocated to the three main hubs with 5ha remaining to supplement the remainder of the district as required based on the identified need of 170ha.

MAIN TOWNS	APPROXIMATE NO. OF HOUSEHOLDS*	% SHARE OF ALL HOUSEHOLDS** (48,072)	% SHARE OF HGI (10,950); total of 30% - 60% apportioned based on relative proportion of all households	HOUSING LOCAL INDICATORS 2015-2030 (units)	COMMITTED UNITS STILL TO BE DEVELOPED AND RESIDUAL ZONING (at 1st April 2015)	ECONOMIC DEVELOPMENT INDICATOR (hectares)	ECONOMIC DEVELOPMENT INDICATOR (Based on population per Ha) POP OPTION 3
DUNGANNON	5,386	11.2%	12% - 24%	1,314 - 2,628	2,697	60	65
COOKSTOWN	4,519	9.4%	10% - 21%	1,095 - 2,299	1,661	55	60
MAGHERAFELT	3,245	6.8%	8% - 15%	876 - 1,642	1,936	55	40
OTHERS							5
<b>TOTALS</b>	<b>13,150</b>	<b>27.4%</b>	<b>30% - 60%</b>	<b>3,285 - 6,569</b>	<b>6,294</b>	<b>170 hectares</b>	<b>170 hectares</b>

*Proposed Revised Allocation of economic development land as per option 3 of the Preferred Options Paper.*

#### Soundness Test

- It is considered that the policy fails to satisfy the test of soundness – CE4 in that the provision of economic land to only the three main towns does not allow for flexibility in dealing with changing circumstances throughout the plan period.

#### Remedy

- A share of economic development land should be set aside for zonings in smaller settlements to sustain and grow economic activity.

### Monitoring & Review

The Local Development Plan is intended to be a flexible document which responds to changing needs and circumstances locally. Monitoring will therefore be essential for the delivery of the local development plan and should provide the basis to trigger any requirement to amend the strategy, policies and proposals of the Plan.

Therefore, we broadly support the monitoring indicators set out in in pages 249 – 252, which are to be used to measure how well the plan is performing in terms of achieving its strategic objectives, including ensuring an adequate supply of housing for the district over the plan period. Table 8 provides a detailed explanation of each monitoring indicator.

Objectives	Outcomes	Indicators	Measures
<p><b>Creating Jobs and promoting prosperity</b></p> <ul style="list-style-type: none"> <li>To facilitate the creation of at least 8,500 new jobs by 2030 at a variety of locations where they are accessible to all members of the community, including those without a private car.</li> <li>To promote diversity in the range of jobs on offer recognising the importance of employment in the primary sector (agriculture forestry and mining), secondary sector (industry and manufacturing) and tertiary sector (administration, commerce, retailing, leisure and tourism).</li> <li>To recognise and accommodate entrepreneurship, innovation for large, medium and small firms by attracting new firms and accommodating expanding businesses.</li> <li>To recognise the importance of self-employment and home working, particularly in rural locations.</li> <li>To encourage energy efficiencies and promote use of renewable energy.</li> </ul>	<ol style="list-style-type: none"> <li>There will be reduced unemployment and increased economic activity in mid ulster.</li> <li>Agriculture, forestry and fishing will remain an important sector.</li> <li>Mineral extraction will continue to provide sufficient materials for the construction industry and related quarry products sector.</li> <li>There will be sufficient land for economic development in our three main towns.</li> <li>There will be sufficient land for economic development in our other settlements.</li> <li>Economic development will have occurred in a sustainable manner and more people will have been facilitated to work from home or in small to medium enterprises.</li> </ol>	<ol style="list-style-type: none"> <li>Regional indicators and targets for economic growth.</li> <li>The extent of economic development land available in our main towns and other settlements.</li> <li>Employment figures for the District.</li> </ol>	<ol style="list-style-type: none"> <li>Employment figures for the District.</li> <li>The availability of economic development land in our three main towns as established by annual monitoring.</li> <li>The number of permissions for economic development in our three main towns and other settlements (floor space permitted) and anticipated number of jobs which may result.</li> <li>The number of permissions for economic development in the countryside?</li> <li>Self-employment levels in the District.</li> </ol>

Objectives	Outcomes	Indicators	Measures
<p><b>Accommodating People and Creating Places</b></p> <ul style="list-style-type: none"> <li>To build Cookstown, Dungannon and Magherafelt as economic and transportation hubs and as the main service centres for shops, leisure activities, public administrative and community services including health and education. These are the most populated places and the town centres are the most accessible locations for people to travel to including those without a car.</li> <li>To protect and consolidate the role of local towns and villages so that they act as local centres for shops and community services meeting the daily needs of their rural hinterlands.</li> <li>To provide for vital and vibrant rural communities whilst protecting the countryside in which they live by accommodating sustainable growth within the countryside proportionate to the extent of existing rural communities.</li> <li>To provide for 11,000 new homes by 2030 in a range of housing capable of meeting the needs of families, the elderly and disabled, and single people, at locations accessible to community services, leisure and recreational facilities, for those people with and without a car.</li> <li>To recognise the needs of both growing families and carers of the elderly and disabled by accommodating development which allows people to remain within their own communities and does not lead to significant harm to neighbours or the built and natural environment.</li> <li>To facilitate the development of new community facilities at locations accessible to the communities they serve, through a variety of modes of transportation in accordance with the community plan.</li> <li>To accommodate cultural differences in our communities whilst promoting "shared spaces" to bring people together with equality of opportunity.</li> </ul>	<ol style="list-style-type: none"> <li>New residential development will have provided quality residential environments will have been provided comprising a mix of house types and tenures in our towns and villages and other settlements.</li> <li>At least 30-60% of housing will have been provided in our main towns.</li> <li>Growth will have been focused in our main towns.</li> <li>Sustainable opportunities will have been provided for homes in the countryside to meet the needs of the rural population at a level of not more than 40% of households in the District.</li> <li>New major retail development will have occurred in our town centres.</li> <li>Our town centres will have become more vibrant and viable places for shops and businesses to trade.</li> <li>We will have better health, education and community facilities.</li> </ol>	<ol style="list-style-type: none"> <li>Housing Growth Indicators and subsequent revisions.</li> <li>The extent of housing land available in our main towns and other settlements.</li> <li>Population levels across mid ulster</li> <li>The pipeline for further housing development as defined by unimplemented permissions and housing zonings.</li> <li>The capacity of our town centres to accommodate growth (defined by retail capacity study).</li> <li>The retail offer and vacancy rates in our town centres.</li> </ol>	<ol style="list-style-type: none"> <li>The extent of housing permissions in our main towns and across our other settlements.</li> <li>The take up of zoned housing land.</li> <li>The number of social/ affordable houses delivered in settlements and in the countryside.</li> <li>The take-up of land for health, education and community uses.</li> <li>The take-up of town centre opportunity sites and land available for mixed use development.</li> <li>Vacancy rates and range of uses in our town centres and extent of non-retail related uses in our Primary Retail Cores.</li> <li>The provision of new health, education and community uses in the District.</li> <li>Any additional needs identified by service providers.</li> <li>The number of housing permissions in the countryside by policy justification and the number of registered farms and total number of commercial fishing licences.</li> </ol>

Objectives	Outcomes	Indicators	Measures
<p><b>Enhancing the environment and improving Infrastructure</b></p> <ul style="list-style-type: none"> <li>To reduce contributions and vulnerability to climate change and to reduce flood risk and the adverse consequences of flooding.</li> <li>To protect and enhance the natural and built environment as wise custodians of our landscape and to achieve biodiversity, quality design, enhanced leisure and economic opportunity and promote health and wellbeing.</li> <li>To accommodate investment in power, water and sewerage infrastructure, and waste management particularly in the interests of public health.</li> <li>To improve connectivity between and within settlements and their rural hinterland through accommodating investment in transportation to improve travel times, alleviate congestion and improve safety for both commercial and private vehicles as well as more sustainable modes of transport including buses, walking and cycling.</li> <li>To improve connectivity through telecommunications which both meets the needs of business and private households whilst reducing the need to travel.</li> </ul>	<ol style="list-style-type: none"> <li>There will be reduced need to travel by private transport.</li> <li>The special character of our Sperrins AONB will have been retained.</li> <li>The distinctive ridge line of Clogher Valley will have been retained.</li> <li>The open vistas, bog and grasslands of the high Sperrins and Slieve Beagh and the lough shores will have been kept free from harmful development.</li> <li>We will have created more greenways and cycle ways whilst safeguarding our canals and main river banks for future use.</li> <li>We will have protected, maintained and enhanced our natural and built heritage for the appreciation of our residents and visitors.</li> <li>You will be able to travel safer and more quickly between our main towns, within the District and across Northern Ireland.</li> <li>There will be more people walking, cycling and using public transport.</li> <li>Everyone will have improved telecommunications and broadband connectivity.</li> <li>A greater amount of our power will have been from renewable sources.</li> <li>Less waste will go to landfill.</li> <li>As result of the provision of by-passes and improvements to the A29 and A5 there will be greater free movement along our main transport routes.</li> </ol>	<ol style="list-style-type: none"> <li>The Landscape Assessment across Mid Ulster and future review.</li> <li>The pressure for housing across Mid Ulster (pressure analysis).</li> <li>Travel to Work Survey Northern Ireland.</li> <li>Pressure analysis of renewable energy development.</li> <li>The availability of broad band and extent of telecommunication not spots.</li> <li>The total amount of energy from renewable sources (NIE Survey).</li> </ol>	<ol style="list-style-type: none"> <li>The number of permissions for high structures and wind turbines in our Area of Constraint on Wind Turbines and High Structures</li> <li>The number and type of permissions granted within our Special Countryside Areas.</li> <li>The number of permissions granted for mineral development within our Areas of Constraint on Mineral Development.</li> <li>The progress made in implementing and providing by-passes and major road improvements.</li> <li>The provision of new cycle ways and greenways.</li> <li>The number of permissions granted for major renewable energy development.</li> <li>The amount of waste going to landfill.</li> </ol>

However projected housing figures, the number of future jobs predicted and the SPFs specified above should be amended as required in order to enable accurate monitoring of the plan.

#### Soundness Test

- Objectives 1, 2, 4 and 8 are not sound under which the success of the plan is being assessed and are not based on robust evidence (Test CE2).

#### Remedy

- Revise as per recommendations above

### **Proposed Site for Inclusion within the Settlement Limits of Killeen**

The site identified in this submission for potential residential use (Annex 1) is located to the south of the Mountjoy Road is located just outside the current settlement development limit of Killeen. It is a suitable alternative site that could be zoned to accommodate housing land. There is a sound rationale for including the identified site within the settlement limit to ensure viable and deliverable development land is available within Killeen, in order to accommodate the projected 33 units required over the new plan period as identified in the POP and the DPS.

These lands are particularly well suited to accommodate expansion of the current settlement limit in line with its increased housing growth for the following reasons:

- The inclusion of site could help to reinforce the settlement and create a centre, something which the settlement currently lacks
- A study of the current available lands within Killeen suggests that there is currently an insufficient amount of viable and deliverable development land within the current settlement development limit.
- The subject land is a logical extension of the existing development limit, as it does not impact on the landscape setting of the town.
- The site is located on the main entry/exit route of the settlement, is closely related to the town and visually relates to the existing dwellings fronting onto the Mountjoy Road which are within the development limit.
- The lands directly abut the existing settlement limit.
- The subject lands would contribute towards meeting the housing need for Killeen over the plan period.
- The site fronts onto the Mountjoy Road making the lands directly accessible from a key route into and out of Killeen.
- There are no physical or environmental constraints such as areas of flooding, or built/natural heritage features and the topography is favourable for development.

The second site identified in this submission for potential economic use. It is also located to the south of the Mountjoy Road is located just outside the current settlement development limit of Killeen. It is a suitable alternative site that could be zoned to accommodate economic land, associated with one of the main local industries within the area.

Western Building Systems are one of the main manufacturers of modular buildings in Ireland and the United Kingdom and are a major contributor to the local economy. The business currently operates from a large £5million state of the art base in the countryside along the Mountjoy Road between Killeen and Coalisland. Established in 1982 the business is continually growing and investing in new machinery in order to remain competitive, a key attribute to the success of the company is the ability to produce products in house and therefore the space to develop these products is vital.

As recently as February 2015 an application for the expansion of the existing operational business to include another building to be used for light engineering purposes in association with the adjacent site/operations was granted on a portion of land adjacent to the current site of the business (M/2014/0359/F). It is suggested that the lands to the south east of Killeen just 0.5km from the

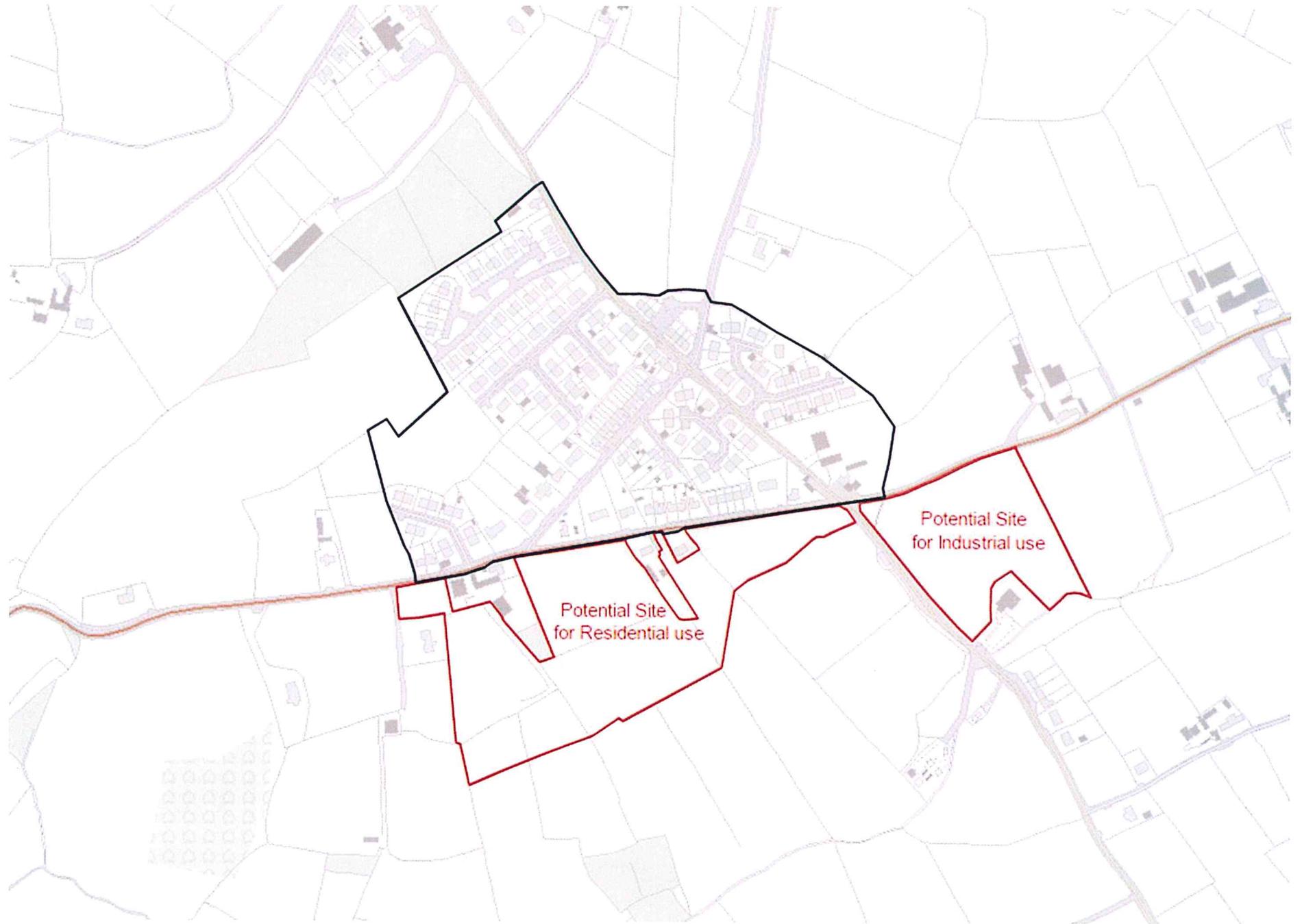
current business premises, could be zoned for industrial uses and used to accommodate future growth associated with the business. While there is no land zoned within the settlement limit for industry or business nor are there any visible businesses operating within the settlement the continued success of Western Building Systems is crucial to the local economy and this location will ensure that any expansion of the business in the future would not encroach on the countryside and potentially help contribute to the vitality of Killeen.

It is clear from the points set out above that the subject lands are appropriately located to contribute towards both meeting the revised projected housing growth and the projected creation of jobs for the district. We would therefore respectfully request that they are considered as a housing zoning and brought within the settlement limit during the forthcoming stages of Local Development Plan preparation.

We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as the LDP progresses.

Yours Sincerely

Helena McDonnell  
**Gravis Planning**



Potential Site  
for Residential use

Potential Site  
for Industrial use