

**Sinead McEvoy**

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**From:** Eamonn Loughrey [REDACTED]  
**Sent:** 24 July 2019 13:32  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** Counter Representations  
**Attachments:** CB 87 MBA Granville.pdf; CB 117 Casey Granville.pdf; CB 148 Retail NI.pdf; CB 154 Moygashel.pdf; CB 164 Fleming Mountstephen.pdf

Dear Sir/Madam

**MID ULSTER DEVELOPMENT PLAN DRAFT PLAN STRATEGY - COUNTER OBJECTIONS**

Please find enclosed 5 counter objections to representations made to the Draft Plan Strategy.

Please acknowledge safe receipt.

Regards

Eamonn Loughrey  
[REDACTED]  
[REDACTED]

**Mid Ulster District Council Local Development Plan 2030 - Draft Plan Strategy  
Submission of a Counter Representation**



Comhairle Ceantair  
**Lár Uladh**  
**Mid Ulster**  
District Council

**Local Development Plan  
Counter Representation Form  
Draft Plan Strategy**

Ref:  
Date Received:  
(For official use only)

Name of the Development Plan Document  
(DPD) to which this Counter representation relates

**Counter Representations must be submitted by 5pm on Friday 9 August 2019 to:**

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

Or by email to [developmentplan@midulstercouncil.org](mailto:developmentplan@midulstercouncil.org)

Please complete separate form for each counter 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		15 Cleaver Park Belfast
Line 2		
Line 3		
Line 4		
Post Code		BT9 5HX
Telephone Number		[REDACTED]
E-mail Address	[REDACTED]	

**SECTION B**

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3(a). Have you submitted a representation to the Council regarding this development plan document?

Yes  No

3(b). If yes, please provide Reference No. and summary of issue raised in you representation.

MUDPS/94 - for the Oaks to be included in policy RE 3 as it is a District Centre and an edge of centre location.

**Counter Representation**

Any person may make a counter representation in relation to a representation seeking a change to a DPD. The purpose of a counter representation is to provide an opportunity to respond to proposed changes to the DPD a result of representations submitted under Regulation 15 and 16 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

**A counter representation must not propose any further changes to a DPD.**

4. Please provide the reference number of the representation to which your counter representation relates to.

MUDPS/148

5. Please give reasons for your counter representation having particular regard to the soundness test identified in the above representation.

Please note your counter 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 any further submissions based on your original counter 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.

Retail NI support the Sequential Test, but fail to consider the position and role of the Oaks District Centre in the retailing hierarchy of Dungannon.

Retail NI provide no evidence to support the case than an edge of centre location should be reduced to 150-200m. This would exclude the Oaks Centre from being an edge of centre location and would open up the opportunity for out of town locations.

It would be inappropriate to reduce the edge of centre definition in the absence of a robust Retail Capacity Study and an assessment of potential sites to meet future need.

Similarly, in the absence of a Retail Capacity Study, there is no justification to amend the floorspace thresholds from 1,000 sq m to 500 sq m.

*(If not submitting online form and additional space is required, please continue on a separate sheet)*

Signature

Eamonn Loughrey

Date

24 July 2019