

**Elaine Mullin**

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**From:** David Donaldson <[REDACTED]>  
**Sent:** 18 April 2019 17:06  
**To:** DevelopmentPlan@midulstercouncil.org  
**Subject:** PLAN STRATEGY REPRESENTATIONS  
**Attachments:** PLAN STRATEGY ACHESON EMPLOYMENT.pdf; PLAN STRATEGY ACHESON HOUSING.pdf; PLAN STRATEGY BELLAGHY.pdf

Dear Sir/Madam,

Please find attached representations.

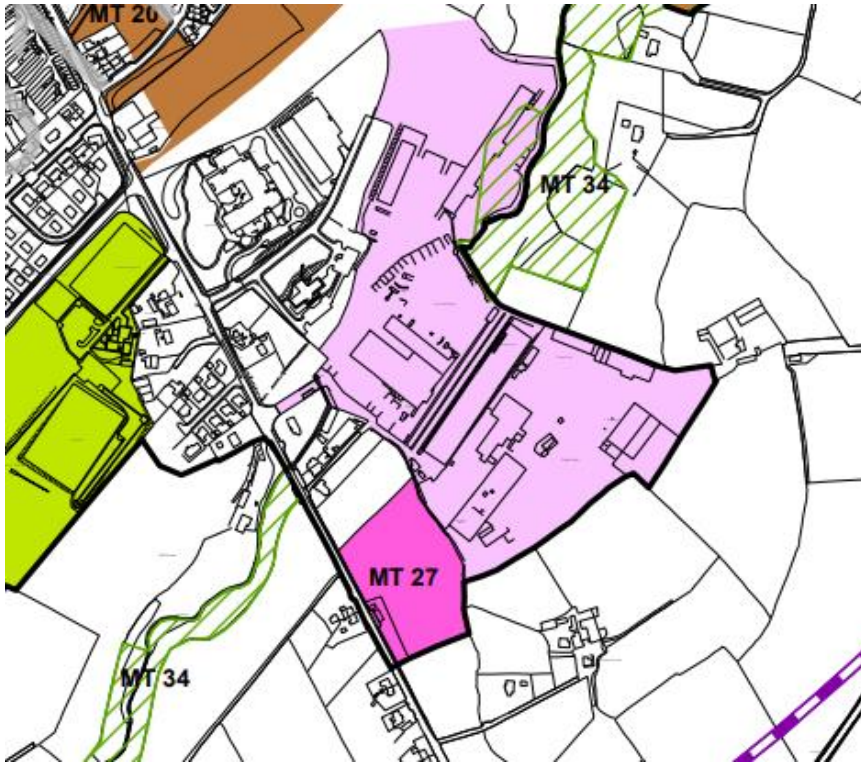
Please acknowledge receipt.

Kind Regards,

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### RESPONSE TO PLAN STRATEGY – EMPLOYMENT LANDS AT BALLYRONAN ROAD MAGHERAFELT

1. In general the Plan Strategy appears to be soundly based in its SPF 2 proposal to focus growth within the three main hubs of Magherafelt, Cookstown and Dungannon.
2. This response supports the proposal for at least 170 hectares of economic development land across the three main towns.
3. Plainly, the prospects for new, large scale manufacturing or distribution uses in Mid Ulster are limited. New employment is likely to be created primarily by smaller scale business and office developments. This is noted in paragraph 12.4 of the Strategy.
4. The suggested policy wording refers to 'economic development' as opposed to 'Industry'. This is welcomed. However it is suggested that the Plan Strategy should indicate that it will adopt a flexible approach to economic development, and permit such areas to be developed not just for Class B2 – B4 industrial and storage uses, but for other employment generating uses such as care homes (where appropriate), hotels, showrooms etc. In addition, there should be no reason why Class B1 office uses should not be permitted on appropriate sites, in order to facilitate larger administrative businesses, call centres etc.
5. The Plan should also identify sites suitable for mixed use development, where a combination of employment uses and housing (social, private and retirement) may provide a means to stimulate economic growth in particular circumstances. The SPPS notes that **'LDPs should identify opportunities for mixed use development, including economic development uses, where this would create synergy and underpin the economic viability of the development as a whole'** (para 6.94). Lisburn has embraced this approach at Knockmore, and Mid Ulster should adopt a similar approach in Magherafelt.
6. The lands shown below would be suitable for a mixed use development opportunity, especially as they are mostly within the same ownership as the zoned and approved housing development to the north.



Lands suitable for mixed use economic development and residential purposes.

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**50A High Street**

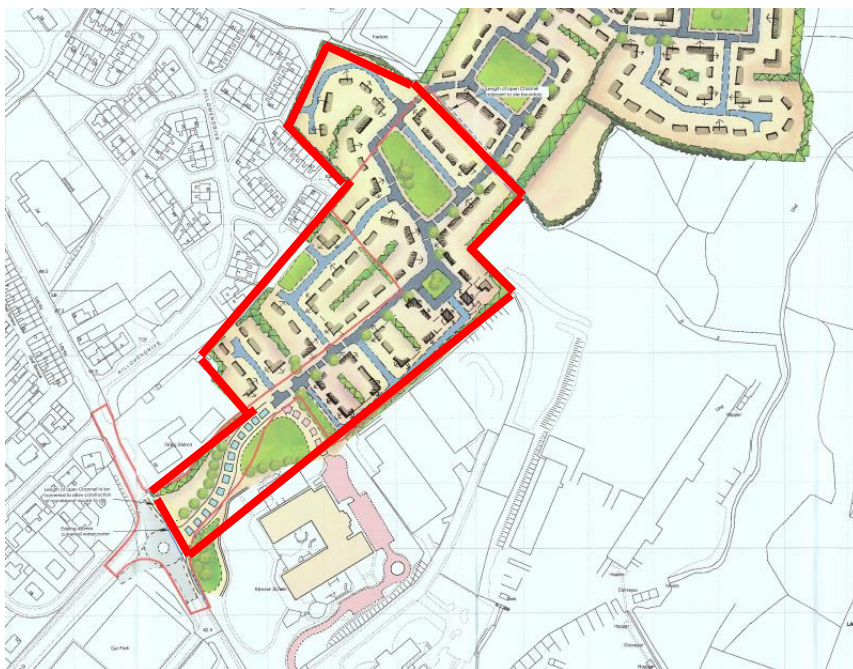
**Hollywood**

**BT18 9AE**

**17 APRIL 2019**

**RESPONSE TO PLAN STRATEGY – HOUSING LANDS AT BALLYRONAN ROAD MAGHERAFELT**

1. In general the Plan Strategy appears to be soundly based in its SPF 2 proposal to focus growth within the three main hubs.
2. In accordance with the growth strategy, this response supports the continued allocation of land for housing development at Ballyronan Road (MT05 in Magherafelt Area Plan), with modest extension to compensate for the fact that the land is no longer blighted by a proposed bypass route.
3. The area to be zoned is shown below. In accordance with paragraph 4.17 this land has good access to services and facilities; can avail of existing infrastructure (especially following the grant of permission LA09/2018/0246/O); will avoid flood risk; have access to public transport; and will not impact on character of the town.
4. We support the commitment in para 4.16 to ensure that at least 30% of the HGI remains available at all times. However given the outline planning approval, this land indicated below should be phase1 housing land.



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**16 APRIL 2019**

### RESPONSE TO PLAN STRATEGY – BELLAGHY

1. In general the Plan Strategy appears to be soundly based in its SPF 2 proposal to focus growth within the three main hubs. In SPF 4 it also notes the need to maintain and consolidate the role of villages as service centres, providing opportunities in keeping with the scale and character of individual settlements.
2. With nearly 400 households, Bellaghy is one of the larger villages. It is, for example, nearly 10 times larger than smaller villages such as Ballylifford.
3. Bellaghy performs a significant local function in terms of community facilities, with several places of worship, shops, café, health centre, cultural centre, GAA clubs and two schools.
4. Paragraph 4.25 of the Strategy indicates that '**in the main**' growth in the villages will be proportionate to their current size and level of services on offer.
5. Appendix 1 of the Strategy suggests that as Bellaghy has 0.8% of the overall District population its share of the HGI should be 0.8%. However this rather basic calculation belies the fact that Bellaghy has a much greater range of services than the majority of any other villages, and that it has a sizeable rural hinterland. The suggestion that smaller settlements should be allocated proportionate growth figures to those with a much greater range of services (such as Bellaghy) undermines the RDS objectives to ensure that development and growth is located in sustainable locations. Larger villages such as Bellaghy should be afforded housing generous allocations which allow for a good range and choice of housing locations to serve the local community.

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