

**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

DRAFT PLAN STRATEGY

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

Please complete separate form for each counter representation.



SECTION A

1. Personal Details

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text"/>

2. Agent Details (if applicable)

<input type="text" value="MS"/>
<input type="text" value="OONAGH GIVEN"/>
<input type="text" value="GIVEN"/>
<input type="text" value="TOWN PLANNER"/>
<input type="text"/>

Address Line 1

Line 2

Line 3

Line 4

10 CARNAN PARK
STRATHROY
OMAGH

Post Code

BT79 7XA

Telephone Number

E-mail Address

info@givenplanning.com

SECTION B

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.

MLDPS/3 IN SUPPORT OF THE INCLUSION OF LANDS FOR ECONOMIC DEVELOPMENT AT ESKRAGH ROAD, GRANVILLE —
IN SUPPORT OF D ECON 1.

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/42

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.

SEE ATTACHED SHEETS.

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

Signature 

Date 16 July 2019

Counter Representation to MUDPS/42 D ECON 1 zoning at Granville in Draft Plan Strategy

**Prepared by Oonagh Given Chartered Town Planner on behalf of Mr
William McClean**

Attachments:

Representation reference MUDPS/42 to Draft Plan Strategy
Representation reference MUPOP/695 and MUDPS/3
Representation reference MUPOP/156 to Preferred Options Paper
Aerial view of land comprising D ECON 1 zoning and surroundings

1. This counter representation is in response to a representation by Inaltus Limited on behalf of Mr Jordan and with Council reference MUDPS/42. In that representation it is recommended that the Council delete allocation D ECON 1 from Granville and to reallocate to a site to the east of D ECON 1.
2. The D ECON 1 zoning was presented as one out of a number of options for further economic land zonings in Dungannon and Granville (page 126 and 127 of the Preferred Options Paper). Note that the Option 3 zoning as presented in the POP (page 127) shows the general southward expansion of the lands zoned *industry and mixed business use* (dark pink) into the area now zoned as D ECON 1 in the Plan Strategy. The Option 3 Zoning does not necessarily include the site identified for Mr Jordan in representation reference MUDPS/42. Selection of that site would involve a southward expansion of the land zoned *existing industry and mixed business use* (light pink) and which was not presented as an option in the POP.
3. In terms of growth of towns the POP presented a number of questions which included:

*What should be the directions for Economic Growth in the towns? Do you have land you wish to propose for this? And,
Are there any areas where development should be discouraged? If so please explain why.*
4. On behalf of my client I submitted a representation in response to the POP which supported Option 3 (reference MUPOP/695). That representation was submitted again in response to the Draft Plan Strategy and has been given the Council reference MUDPS/3 (see attached).
5. Representation was also made with respect to Option 3 by Inaltus Limited (reference MUPOP/156/1). For ease of reference I have attached their complete representation.

6. The Council's interpretation of MUPOP/156/1 is summarised in the *Preferred Options Paper Public Consultation report January 2019* as follows:

*"land owner supports Option 3 expansion of industrial lands as set out at page 127 of the POP. Opt 3 strongly preferable location for growth compared to Opt 1 & 2 which would unnaturally expand physical limits of ind land into countryside."*¹

7. It would appear that my original representation to the POP and that of Inaltus has been taken into account as the lands presented in Option 3 in the POP for economic growth have been zoned as economic development land (D ECON 1) in the Draft Plan Strategy. The selection of the lands labelled D ECON 1 is consistent with the option presented in the POP.
8. According to MUDPS/42, the DECON 1 zoning is inconsistent with the Council's stated approach to defining settlement limits. This contradicts the previous representation made by Inaltus (MUPOP/156) which fully supported the inclusion of the Option 3 lands (see copy attached), referring to the lands as being "*relatively flat*" and "*contained on all sides by existing industrial land and the road network, providing clear defensible boundaries.*"
9. The Council's approach to defining settlement limits is given on page 35 paragraph 4.10 of the Plan Strategy. In defining settlement limits consideration is to be given to each of the six points. The suitability of the lands at D ECON 1 in terms of compact urban form, protecting the setting of the village, residential amenity, flood risk, and protecting important natural and historic features was examined in my original submission (see paragraphs 7.1 – 7.11 of MUDPS/3). I consider that in terms of the alteration of the Granville settlement limit, that the zoning is consistent with the council's own points for consideration when defining settlement limits.
10. With respect to the third bullet point of paragraph 4.10 in the Plan Strategy, I take this opportunity to add that the mid section of D ECON 1 is relatively low lying with the land on either side gently rising. The hilltop adjacent to the east appears to have been deliberately excluded from the site in order to avoid development on a prominent site and which would be contrary to the third bullet point.
11. The distance between D ECON 1 and the residential area in Granville centre is around 800 metres – well within walking distance for those workers who do not have a car. D ECON 1, is not located away from the established industrial or planned in an irregular way. It is adjacent

¹ Taken from Site Specific Representations of Appendix 7 on page 848 of the on line document.

to the established site and around 100 metres by road from the existing Dungannon Business Park. Vehicular access is already existing to D ECON 1 with very minimal work required if any. Companies occupying the Dungannon Business Park at the present are: Terex, Portafill, Axon, Blue Mac Manufacturing, and Westland Fertilizers. These companies would be employing hundreds of people who have no problem with gaining access to the Park with or without vehicles.

12. The zoning also contains land owned by my client who proposes to develop his business in making plant and machinery for the quarrying and recycling industries at the site and whose customers include Portafill and Terex which are located just across the road from the zoning. Attached aerial view shows location of Portafill and Terex, D ECON1 outlined in red, and, my client's lands hatched.
13. Inaltus recommend that an alternative site (referred to as D ECON 6 in their map) around 200 metres to the east of DECON 1 be zoned.
14. The purpose of the Independent Examination is to test whether the Plan is sound. As the land identified as ECON 6 in the Inaltus representation is not part of the Plan then that piece of land may not be examined for soundness or otherwise as part of the Independent Examination. I consider that the time for considering its inclusion in the Plan Strategy has passed.
15. If it is considered that the D ECON 1 zoning is not sound, it may then be the case that its removal from the Plan Strategy would remedy the situation. If removal of the D ECON 1 zoning were to leave a shortfall in economic development land zoning in the Strategy, I consider that it would then fall to the Council to go through a process of considering reasonable alternatives. It should also be noted that of the 170 ha land to be allocated to economic development only a portion has been zoned in the Plan Strategy and that further land will be zoned as part of the Local Policies Plan.

Google Maps terex near Granville Industrial Estate, Dungannon



Imagery ©2019 DigitalGlobe, Maxar Technologies 100 m

Michael McGibbon

From: Eamonn Loughrey [REDACTED]
Sent: 18 April 2019 16:45
To: DevelopmentPlan@midulstercouncil.org
Subject: Mid Ulster Development Plan Draft Plan Strategy
Attachments: Final Jordan Submission.pdf

Dear Sir/Madam

MID ULSTER DEVELOPMENT PLAN - REPRESENTATION ON DRAFT PLAN STRATEGY

On behalf of my client Mr Jordan, please find enclosed a representation to the Mid Ulster Council Draft Plan Strategy in respect of industrial lands at Granville.

Please acknowledge receipt

Regards

Eamonn Loughrey
[REDACTED]
[REDACTED]

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



Comhairle Ceantair
Lár Uladh
Mid Ulster
District Council

Local Development Plan
Representation Form
Draft Plan Strategy

Ref:
Date Received:
(For official use only)

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

Draft Plan Strategy

Representations must be submitted by 4pm on 19th April 2019 to:

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

Or by email to developmentplan@midulstercouncil.org

Please complete separate form for each representation.

SECTION A

1. Personal Details

Title	<input type="text" value="Mr"/>
First Name	<input type="text"/>
Last Name	<input type="text" value="Jordan"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text"/>

2. Agent Details (if applicable)

<input type="text"/>
<input type="text" value="Eamonn"/>
<input type="text" value="Loughrey"/>
<input type="text"/>
<input type="text" value="Inaltus Limited"/>

Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="15 Cleaver Park"/>
Line 2		<input type="text" value="Belfast"/>
Line 3		
Line 4		
Post Code	<input type="text"/>	<input type="text" value="BT9 5HX"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text" value="REDACTED"/>	

SECTION B

Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

3. To which part of the DPD does your representation relate?

- (i) Paragraph
- (ii) Objective
- (iii) Growth Strategy/
Spatial Planning Framework
- (iv) Policy
- (v) Proposals Map
- (vi) Site Location

4(a). Do you consider the development plan document (DPD) is:

Sound Unsound

4(b). If you consider the DPD to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6 (available on the Planning Portal Website at <https://www.planning.gov.uk/index/advice/practice-notes/development-plan-practice-note-06-soundness-version-2-may-2017-2a.pdf.pdf>).

Soundness Test No.

C2

5. Please give details of why you consider the DPD to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

If you consider the DPD to be sound and wish to support the DPD, please set out your comments below:

See attached sheet.

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

6. If you consider the DPD to be unsound, please provide details of what change(s) you consider necessary to make the DPD sound.

Please note your 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 a further submission based on your original 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.

See Attached Sheet.

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

7. If you are seeking a change to the DPD, please indicate if you would like your representation to be dealt with by:

Written Representation

Oral Hearing

Please note that the Department will expect the independent examiner to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Signature:

Eamonn Loughrey

Date:

19 April 2019

Area Plan Objection

Objection to Mid Ulster Local Development Plan 2030 – Draft Plan Strategy

Objection made by: Inaltus Limited

Objection Made on behalf of : Mr Jordan

Date: 19th April 2019

Site: Lands at Granville, Dungannon

Designation: N/A

Policy: SPF 3

Paragraph:

Page: 47 & 52-53

Map: Map 1.2 Granville Economic Development Zones

POP Rep Refs: MUPOP/156/1
MUPOP/156/2

Introduction

This objection is made against the Mid Ulster draft Plan Strategy (dPS) and the dPS comments/designation on lands at Granville.

Summary of POP Objection

Support Option 3 as it is a strongly preferable location to Options 2 & 3. Allocate clients lands.

Draft Plan Strategy (dPS)

We object to the allocation of industrial site D ECON 1 on the basis that it is located away from the established industrial area.

The Council's decision to allocate these lands seeks to expand the industrial area in an irregular way and does not follow good practice in planning of settlements where areas of expansion should follow natural and defensible boundaries, notches in lines of settlement limits, infill sites and include lands that abut settlement boundaries. D ECON 5 abuts the area of proposed industry along one boundary. It leaves open the scope to expand the boundary to include land immediately northeast of the designation including our client's lands. Pressure will come for infilling these lands. This is contrary to the dPS paragraph 4.10 which sets out that development limits should seek to achieve compact urban forms and avoid urban sprawl.

On the other hand, our client's lands abut the existing industrial designations, is located close to the other businesses in Granville, is close to the support facilities such as local shops in Granville so workers could walk to shops at lunchtime, is close to the bus route in Granville and would be easier for workers to walk to. The Granville Road is used daily by workers that walk to the area from Dungannon for work purposes. Our client's lands comply with paragraph 4.10 of the dPS. Neither D ECON 1, 2 or 3 considers the accessibility of the site to workers that may not have vehicular access.

The only benefit to D ECON1 is it is marginally closer to the A1 junction, however, that single benefit is not of such significance that it outweighs the benefits of our client's better located lands.

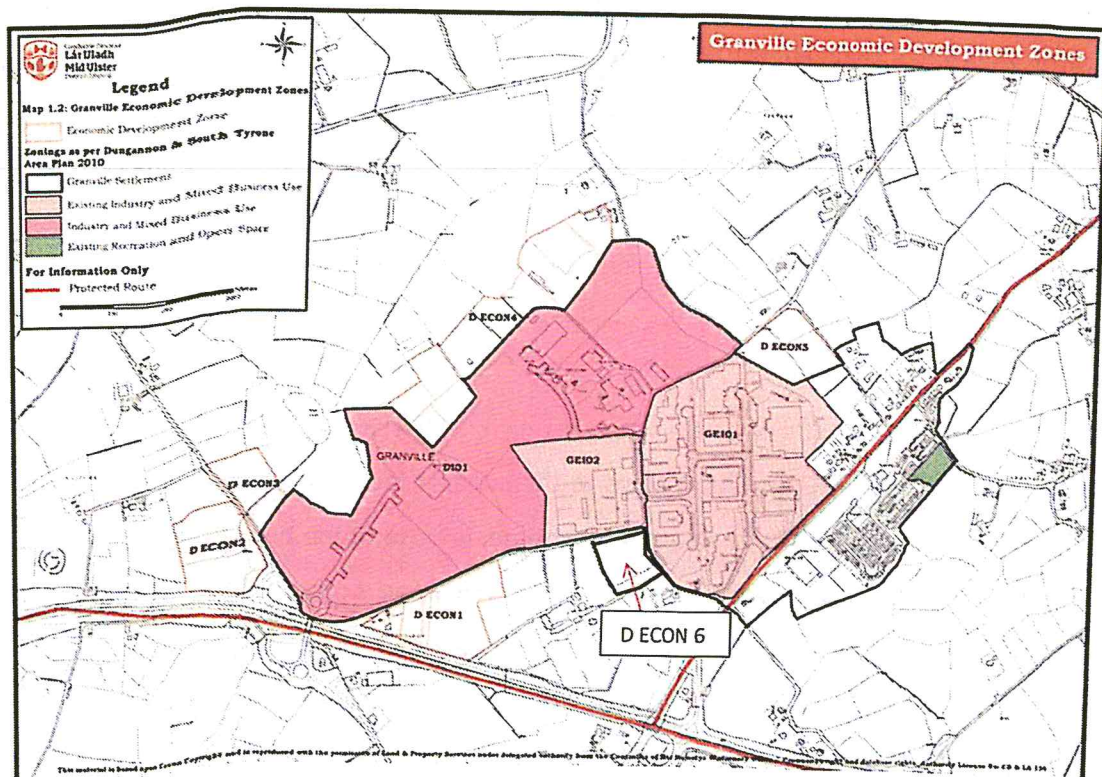
Tests of Soundness

CE2 – allocations are realistic and appropriate

The Council have zoned lands that are inconsistent with its stated approach to defining development limits.

What is Needed to Make the Plan Sound?

We request the Council delete allocation D ECON 1 and re-allocate this as shown on the attached map (which we identify as D ECON 6).



OONAGH GIVEN CHARTERED TOWN PLANNER

10 Carnan Park, Strathroy, Omagh County Tyrone BT79 7XA

Mobile: [REDACTED]

E mail: [REDACTED]

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

18 March 2019

Dear Ms McEvoy,

Response to Draft Plan Strategy – Zoning D ECON 1 at Granville

Land belonging to my client lies within the above proposed zoning. My client is in support of the D ECON 1 zoning for economic development at Granville and considers that it complies with the Soundness Tests. In the event that a representation is made contesting this zoning and/ or the policies associated with it I will make a counter representation.

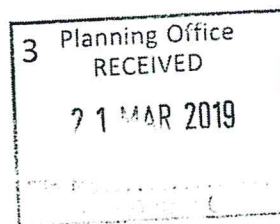
I understand that the Council will require 170 hectares of land zoned across Cookstown, Dungannon and Magherafelt for economic development use and that given that there is an immediate need for economic land in Dungannon, land has been zoned at both Dungannon and Granville. The remaining economic development lands will be zoned as part of the Local Policies Plan.

I wrote to the Council previously with respect to the inclusion of my client's land for economic development use in November 2017 and have enclosed the representation which was made at that time. If for any reason the above zoning is removed from the Plan Strategy as a result of the Independent Examination, my client would wish that his site be considered as part of the *Local Policies Plan* – hence the reason for enclosing the representation.

Yours sincerely

Oonagh Given

[REDACTED SIGNATURE]



ACEmap® Single

Printed: 27/11/2017 Customer Ref: **Granville**

Centre Point (Easting, Northing): 276577, 360350

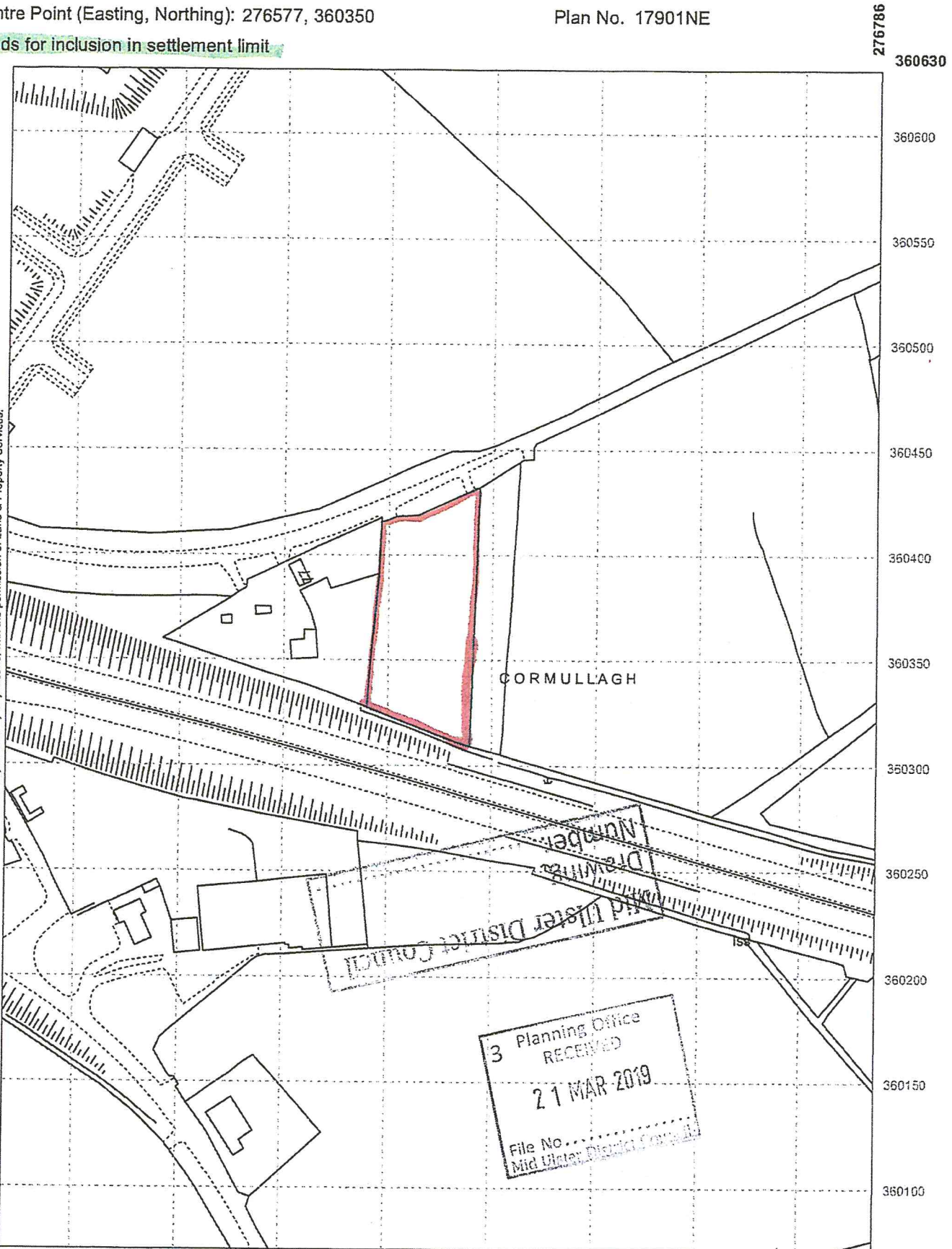
Lands for inclusion in settlement limit

Scale: 1:2,500

Order no. ORD48200

Plan No. 17901NE

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Case for the inclusion of Lands at Eskragh Road, Granville to be zoned for economic development land as part of the Mid Ulster District Council Local Development Plan 2030.

Prepared by Oonagh Given Chartered Town Planner
On behalf of Mr William McClean

1.0 The Site Location and Context

- 1.1 The site is situated on the edge of the village of Granville which itself is one mile from the centre of Dungannon town. Granville is distinguished by its extensive industrial estate which spreads westwards from Granville Road. Residential development takes a linear form along Granville Road with a few in depth housing estates. About three quarters of the total urban footprint of Granville is taken up by the industrial estate.
- 1.2 The subject site comprises a rectangular field of 0.52 hectares and is accessed directly off Eskragh Road. The site is part of an undeveloped area of land grown over with rushes and sandwiched between the existing Granville Industrial Estate to the north and the A4 dual carriageway to the south. The site follows the topography of Eskragh Road sloping down from west to east. West of and adjacent to the site is a detached domestic property with what appears to be some sort of haulage or transport enterprise attached. The lands adjacent and to the east are undeveloped and, except for the presence of a stock proof fence, are indistinguishable from the site.
- 1.3 Overlooking the site on the opposite side of the A4 is Ewing Bros which is a freight company and next to that is a yard used by Moy Park.
- 1.4 Access to the dual carriageway is around 100 metres away.
- 1.5 The site forms part of an agricultural holding which is operated at Inishtieve, Carrickmore.
- 1.6 The attached map shows the site outlined in red and some of the neighbouring businesses are also indicated.

2.0 Proposed Used

- 2.1 The land owner is William McClean. Mr McClean is the owner of a firm called Plant and Design Engineering which makes machines for the quarrying and recycling industries. Plant and Design Engineering comprises four members of staff (three full time and one part time) plus Mr McClean. The business currently operates out of rented accommodation on Legilly Road, Greystone and has done so for approximately 20 years. Mr McClean would like to develop his business at the subject site.



3.0 The Dungannon and South Tyrone Area Plan 2010

- 3.1 The land is located south of and adjacent to the limit of development for Granville as identified in the Dungannon and South Tyrone Area Plan 2010 (DSTAP 2010). The lands on the opposite side of Eskragh Road and north of the site are zoned for industry and business (Plan reference DI 01).
- 3.2 The DI 01 zoning roughly lies along a south west / north east axis. On its eastern side it is bounded by existing industry and countryside (including the subject site). Its southern tip brushes the A4 dual carriageway, and otherwise the remaining boundaries to the south west and north lie adjacent to the countryside.
- 3.3 The DSTAP 2010 states that:
"Granville provides the Borough's strategic location for industrial development and it is anticipated that it will meet the requirements of INI over the Plan period. It is ideally located for further expansion close to the primary road network and there is potential to strengthen its role by development at this location".
- 3.4 The DI 01 zoning has been developed in the years following the publication of the DSTAP 2010.
- 3.5 Adjacent to and west of the DI 01 zoning is a designated Site of Local Nature Conservation Interest (SLNCI) - Black Lough (Cormullagh). Some 200 metres away to the north of the zoning is the Eskragh Lough SLNCI.
- 3.6 Within the vicinity of Eskragh Lough and north of the DI 01 industrial zoning are three archaeological sites.

4.0 The Regional Development Strategy 2035

- 4.1 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*.
- 4.2 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. Granville is around 5 kilometres from the junction of these two significant transport routes
- 4.3 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 and Granville is one mile from Dungannon, the larger of the two.

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

- 5.1 The Preferred Options Paper (POP) has formulated a number of Strategic Planning Guidelines for the development of the District. SPG 1 proposes to define settlement limits to “*provide compact urban forms*” and “*to protect the setting of individual settlements*”. SPG 4 proposes to “*maintain and consolidate the role of the villages as local service centres providing opportunity for housing, employment and leisure activities in keeping with the scale and character of individual settlements*”.
- 5.2 For the purpose of the Mid Ulster Local Development Plan, Granville maintains its status as a village.
- 5.3 The 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. This has been translated into the need for 170 hectares of zoned industrial land in Mid Ulster which will be spread out across the three main towns – Cookstown, Dungannon and Magherafelt. Dungannon is the largest town in the District and the POP states that industrial land supply in Granville will be vital in supplementing the availability of industrial land in Dungannon
- 5.4 For the purpose of identifying land to provide for the 8500 new jobs anticipated over the plan period, the POP has come up with a number of options for locating economic development land in some of the settlements including Granville.
- 5.5 The three economic development growth options for Granville are:
Option 1 east of the A45 Granville Road
Option 2 west of Killyliss Road just opposite “Portafill International”
Option 3 south east of the Eskragh Road and including the subject site.
- Option 1
- 5.6 Option 1 shows extension to the east of the A45, extending development southwards (from the village) along the length of Granville Road towards the A4. It is bounded by Killybracken Road to the north east; the lands to the south east and to the North West on the other side of Granville Road are fields. There is a house adjacent to the south west. There are a number of detached dwellings in the vicinity along Killybracken Road including one just across from the site.
- 5.7 Part of this site next to Granville Road is affected by the Q100 floodplain.

- Option 2
- 5.8 Option 2 shows a westward expansion of the existing industrial area on the opposite side of Killyliss Road and running along the north side of the A4 dual carriageway. The field nearest the village is flat and the surrounding lands to the north comprise undulating fields with mature hedgerows. Option 2 is bounded by an access road on to the dual carriageway on its south eastern side. Portafill International is located immediately opposite (i.e. to the east) on Killyliss Road.
- 5.9 A small water course traverses the lands. A small area appears to be in the surface water flood plain.

- Option 3
- 5.10 Option 3 shows an extension into the lands on the southern side of Eskragh Road. These lands include the subject site. These lands are covered in rushes and follow the topography of Eskragh Road which forms a dip right at the centre of the lands in question. The lands on the opposite side of Eskragh Road form part of the Granville Industrial Estate and are fully developed. There is a house and commercial business west of and adjacent to Option 3. The lands are bounded by the A4 dual carriageway to the south and are overlooked by Ewing Bros. freight business which occupies a prominent position on the other side of the dual carriageway. The remaining lands to the east comprise fields and contain a complex of buildings which appear to accommodate an upholstery business (McClure's).
- 5.11 A small area appears to be in the surface water floodplain.

6.0 The case for further economic development lands at Granville

- 6.1 Granville is located around 5 kilometres from the junction of the A29 (Mid Ulster Spine) and the M1, and at its southern reaches is only about 100 metres from the A4 dual carriageway (which forms part of the same key transport corridor as the M1).
- 6.2 Given its position relative to two significant transport routes, Granville is well placed as a departure point for access to Belfast, the West, Dublin and the Republic of Ireland. The extant Dungannon and South Tyrone Area Plan 2010 states that:

"Granville provides the Borough's strategic location for industrial development and it is anticipated that it will meet the requirements of INI over the Plan period."

- 6.3 While the plan area for Mid Ulster District is much larger than the former Dungannon and South Tyrone Borough, it is contended that Granville maintains its former "*strategic location*" even with the plan area expanded to include the former Magherafelt and Cookstown District Councils. This is because of its excellent links to the Regional Strategic Transportation Network and its proximity to Dungannon which is the largest town in Mid Ulster District and one of the 15 towns in Northern

Ireland designated as *main hubs* by the Regional Development Strategy 2015.

- 6.4 Further economic development lands at Granville would also help to consolidate its role and character as an existing centre for industry in accordance with SPG 4 of the Council's Preferred Options Paper.

7.0 The case for zoning economic development land at Option 3

- 7.1 The Mid Ulster District Preferred Options Paper shows three options for expanding Granville for the purpose of industrial and business development. One of these options – Option 3 includes the subject site. The case in support of Option 3 and the subject site is made having regard to a number of planning considerations as set out below and by comparing Option 3 to the other two options where applicable.

Protection of designated sites

- 7.2 It is noted that all three options are generally to the south of the village and it is assumed that this is because of the presence of the Black Lough and Eskragh Lough Sites of Local Nature Conservation Interest to the north and North West, and the presence of archaeological sites to the north of the settlement.
- 7.3 Development of the lands at Option 3 will take development away from these sites of archaeological and nature conservation interest.

Flooding

- 7.4 A significant portion of the lands at Option 1 (along the Granville Road) are contained within the Q100 flood plain. Under the Strategic Planning Policy Statement (SPPS), Local Development Plans should not bring forward sites or zone land that may be susceptible to flooding unless in exceptional circumstances. The fact that the area of flood risk is all along the part of the site next to the public road may prohibit the zoning of these lands for development if they cannot be accessed from Granville Road.
- 7.5 Discrete areas of surface water flood plain are indicated on the land at Option 3 (option 3 includes the subject site). However given their limited area, and the fact that they do not prohibit access from the public road, it would be possible to develop the surrounding lands without imposing on the areas of surface water flooding.

(SPG 1 of the Preferred Options Paper) – Compact Urban forms and the setting of settlements

- 7.6 Development of Option 3 will achieve a compact urban form and protect the setting of Granville more so than the other two options. This is because Option 3 is surrounded by existing development. It is bounded by the existing industrial estate on two sides (immediately to the north and a little further away to the east), and although Ewing Bros. on Killyliss Road is outside of the settlement limit it occupies a

prominent position in terms of the setting of the village and is located just south east of the subject lands.

- 7.7 At present the lands at Option 3 are of no consequence in terms of the setting of the village surrounded as they are by development both in and outside of the existing settlement limit. Development of option 2 would extend development in a linear fashion away from the centre of the village into an area of attractive countryside to the west and could have the effect of undermining the setting of the village.

Residential Amenity

- 7.8 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.
- 7.9 Option 3 and the subject site are already surrounded by business and industrial land use and are removed from the residential part of the village. Apart from a single detached house, which appears to have a commercial business attached, adjacent to the subject site, there appear to be no other dwellings within the immediate vicinity.
- 7.10 Of the three options Option 1 is closest to the mainly residential village "centre" to the north, there are also detached residences on either side of Option 1 and some sporadic residential development a little further away to the south east on Killybracken Road.
- 7.11 The development of land for industrial or business use at Option 3 would be in accordance with the nature of development in the surrounding context and is much less likely to impact on residential amenity than Option 1.

9.0 The case in support of zoning the subject site for economic development

- 9.1 The prospect of land being released for development by the respective landowner and the willingness of business people to invest in a particular location is a matter of relevance to the planning authority when zoning land for economic development.
- 9.2 At the UK level it has been reported that there is an issue with "land banking" where land that has received planning permission for housing, or is zoned for housing, is not actually being developed. Whilst the delivery of land for housing and economic development is a function of the planning system it also depends on land owners, developers and business people to realise such plans.

- 9.3 In the case of the subject site, the landowner is William McClean who owns Plant and Design Engineering, a business that manufactures machines for the quarrying and recycling industries. Mr McClean has developed his business over the past 20 years or so from rented premises on Legilly Road, Greystone.
- 9.4 At present Mr McClean finds the site at Greystone to be limiting in terms of space and in terms of how he may use the yard as it is also used by the landlord. The existing business is in the countryside and is not associated with any settlement, which from a planning point of view is not very sustainable. Any plans to develop the business at this rural location may also be inhibited by rural planning policy.
- 9.5 Mr McClean's plan would be to develop the business at the subject site. The inclusion of Option 3 lands into the industrial and business zoning would facilitate the movement of (or expansion of) an established business in a remote rural location to a more sustainable location where planning policy will be more favourable towards any necessary expansion.
- 9.6 The importance of firms involved in manufacturing products for the quarrying industries in Mid Ulster is acknowledged in the Council's Preferred Options Paper. Given that sand and gravel and related businesses make a significant contribution to the Mid Ulster economy, it is important that there is healthy market competition to cater for the needs of all those involved. This means allowing smaller businesses such as Plant and Design Engineering to flourish; thereby offering alternatives and complimenting the larger firms.

Ruairi O'Kane

From: Eamonn Loughrey [REDACTED]
Sent: 22 January 2017 14:35
To: DevelopmentPlan@midulstercouncil.org
Subject: Mid Ulster Local Development plan - POPs Paper Response
Attachments: Granville Representation 1.pdf; Annex 1 Granville (option 3).pdf

Dear Sir/Madam

Mid Ulster Local Development plan - POPs Paper Response

Further to the above and on behalf of my client [REDACTED], please find attached a representation to the Council's POPs Paper in respect of Industrial Land at Granville and Option 3 Growth Area.

Please acknowledge receipt.

Regards
Eamonn Loughrey

[REDACTED]
[REDACTED]



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 (if applicable)

Title	<input type="text" value="[REDACTED]"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="[REDACTED]"/>	<input type="text" value="Eamonn"/>
Last Name	<input type="text" value="[REDACTED]"/>	<input type="text" value="Loughrey"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text" value="Inaltus"/>
Address Line 1	<input type="text"/>	<input type="text" value="15 Cleaver Park"/>
Line 2	<input type="text"/>	<input type="text" value="Malone Road"/>
Line 3	<input type="text"/>	<input type="text" value="Belfast"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="BT9 5HX"/>
Telephone Number	<input type="text"/>	<input type="text" value="[REDACTED]"/>
E-mail Address	<input type="text" value="[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) 126-127
- (ii) Subject (s) Economic Development Growth
- (iii) Policy Ref (s) N/A
- (iv) Map Name (s) Granville

Please set out your comments below and continue on a separate sheet if necessary.

PoPs Paper page 126, notes that "*There is also industrial land available in nearby Granville and this will be vital in supplementing the availability of industrial land in Dungannon ...3 Growth Direction Options are also identified for Granville as possible directions for future growth*".

Response


(See annotated Granville Option 3 map at Annex

1). These lands abut two sides of the existing industrial lands. This land is available for industrial development and as such my client would support the expansion of the industrial lands in the direction of Option 3 as set out at page 127 of the PoPs paper.

Moreover the lands are relatively flat and there are a number of access options available to allow the lands to connect to the existing industrial areas.

It is also clear that Option 3 would be a strongly preferably location for growth when compared to Options 1 and 2, which would unnaturally expand the physical limits of industrial land into the open countryside.

Option 3 allows the growth area to be contained on all sides by existing industrial land and the road network, providing clearly defensible boundaries.

We would be willing to discuss this matter further as the Council moves towards preparing its draft Plan Strategy document in the coming months.

Attachment

Annex 1 Annotated Granville (Option 3) Map

(Continue on a separate sheet if necessary)

Signature:

Date:

You are encouraged to provide your comments via email to the following email address:
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 27TH JANUARY 2017

Granville

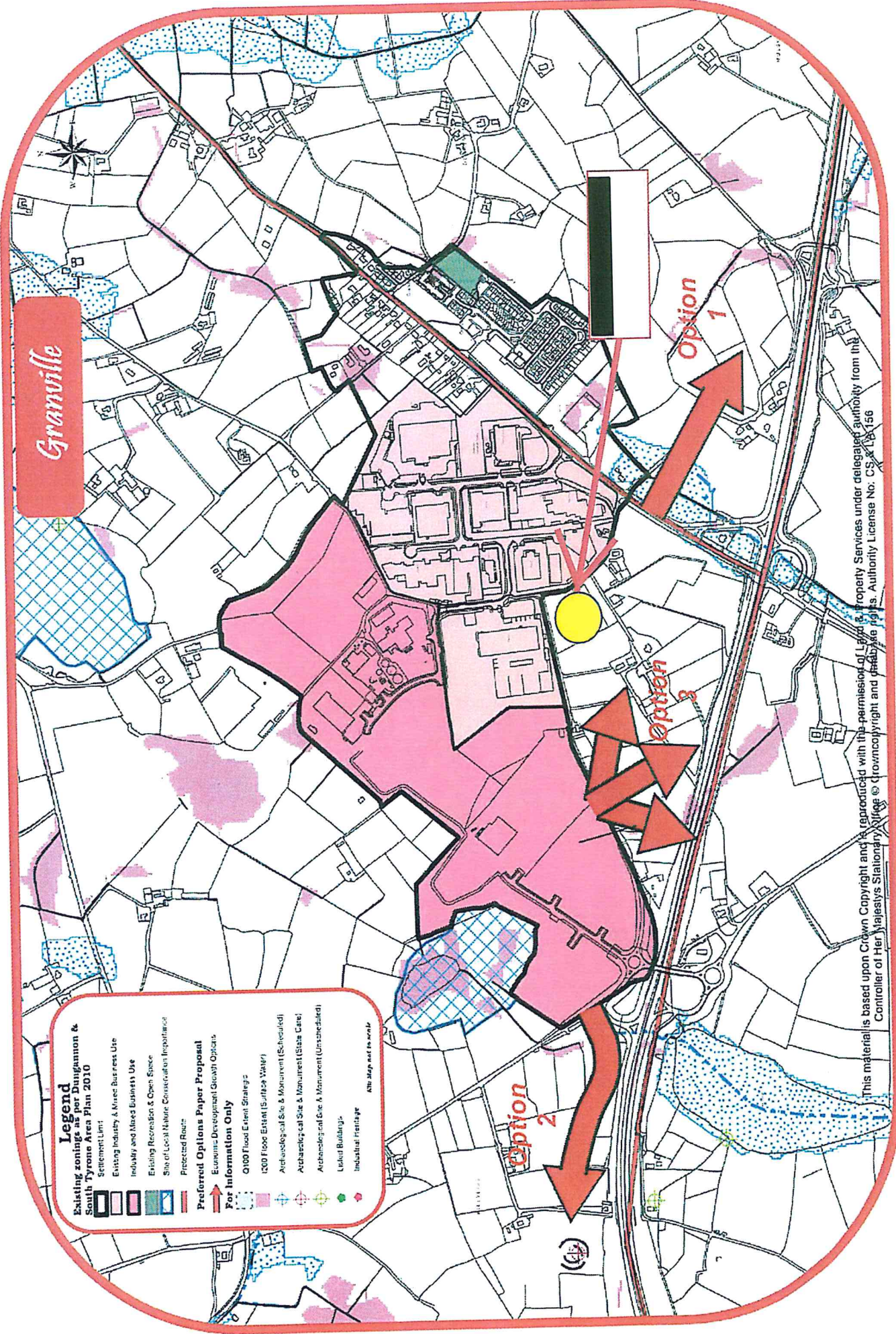
Legend
 Existing zonings as per Dungannon & South Tyrone Area Plan 2010

- Statement Limit
- Existing Industry & Retail Business Use
- Industry and Mixed Business Use
- Existing Recreation & Open Space
- Site of Local Nature Conservation Importance
- Proposed Route

Preferred Options Paper Proposal

- Economic Development Growth Options
- For Information Only
- Q100 Flood Extent Strategy
- Q100 Flood Extent (Surface Water)
- Archaeological Site & Monument (Scheduled)
- Archaeological Site & Monument (State Care)
- Archaeological Site & Monument (Unscheduled)
- Unkilled Building
- Industrial Heritage

Alt: Map not to scale



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