

ANNEX B – Response Pro-forma

Name: CONOR COCHRANE

Address: 5 Oxford Street, Belfast, BT1 3LA

Original Representation Reference Number: MUDPS/86 (for administrative use only)

Please tick the applicable box below.

- a) I confirm that I wish for my original representation to be considered as my representation.

- b) I confirm that I wish to amend or add to my original representation.

- c) I confirm that I wish for my original representation to be withdrawn and that I no longer wish to make a representation.

Signature:



Date:16/03/2020.....

If you require assistance when completing the above, please contact developmentplan@midulstercouncil.org

Please ensure you return this completed Pro forma (along with any additional documents if you have ticked [b]) above) to Development Plan Team, Planning Department, Mid Ulster District Council, 50 Ballyronan Road, Magherafelt, BT45 6EN, by 5pm on 21st May 2020.

Elaine Mullin

From: Conor Cochrane <[REDACTED]>
Sent: 18 April 2019 13:02
To: DevelopmentPlan@midulstercouncil.org
Subject: LDP draft Plan Strategy Representation Matter 32 Brackaville Road Newmills
Attachments: MU dps Rep Housing Matter 32 Brackaville Road, Newmills.pdf

Dear Sirs,

We attach for your consideration our site specific representation/comments relating to the Mid Ulster Council LDP draft Plan Strategy dated 21 February 2019 relating to Brackaville Road, Newmills on behalf of a client of this office.

I trust this is satisfactory however, should you require any further information or clarification, please do not hesitate to contact me.

Please confirm receipt on Matter 32

Kind regards,

Conor Cochrane
Senior Planner

CLYDE SHANKS

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Planning LDP Team
Mid-Ulster Council Offices
50 Ballyronan Road
Magherafelt
BT45 6EN

BY E-MAIL

18th April 2019

Our Ref: Matter 32

E: [REDACTED]

Dear Sir/Madam,

REPRESENTATION TO LOCAL DEVELOPMENT PLAN (LDP) – LANDS AT BRACKAVILLE ROAD, NEWMILLS

MID ULSTER DISTRICT COUNCIL

We write on behalf of our client Mr Williamson in relation to the Council's recently published draft Plan Strategy. This letter relates to the strategic theme of housing, and provides commentary on our client's site at Brackaville Road, Newmills.

Growth Strategy and Spatial Planning Framework

Spatial Planning Framework

We remain of the view that the framework elements SPF1 – SPF6 are in theory in accordance with the strategic direction of the RDS. However, the actual housing allocation figures articulated in Appendix 1 do not reflect a coherent strategy and in practice will not result in growth being focused within the three main towns nor will it result in a sustainable pattern of development in the countryside.

Rather, due to the equitable split of housing across the settlement hierarchy and countryside, and the very substantial over-subscribing of housing identified in large part due to existing committed developments, the proposed allocations will encourage a dispersed pattern of settlement and place undue pressure on the countryside from a landscape, environmental and infrastructure perspective.

The disconnect between the strategy and the figures in Appendix 1 is most stark in relation to the HGI. The HGI for Mid Ulster is identified as 11,000 houses pro-rata over the plan period to 2030. However, when the actual capacity of settlements and equitable split of the HGI as identified in Appendix 1 is tallied with the 40% housing in the countryside it results in a total of 19,074 dwellings. This is over 170% of the HGI.

This creates fundamental tensions between the strategy and the proposed growth/allocation that are not grappled with in the draft Plan Strategy. This substantial over-allocation would not be sustainable as previously articulated as it provides such a generous spread of housing across the settlement hierarchy there is no mechanism to direct growth to the main towns.

Whilst SPF6 states that the countryside will not be subject to an allocation of the District's HGI, this is not the case in reality. Any dwelling constructed within the District boundaries during the Plan period counts towards housing growth, irrespective of how it is characterised. If 4,300 dwellings are built in the countryside during the plan period, this is 40% of the HGI allocation whether or not the Council chooses to call it such.

It is clear that there is a need for the Council to follow through on its strategy and make difficult decisions on where to reduce growth in order to genuinely seek to achieve sustainable patterns of development. In our view this must start with a significant reduction in housing allocated to the countryside, and that this must be delivered through the provision of more restrictive area-specific or district-wide rural housing policies.

Site Specifics

The site is located to the east of the settlement limit of the village of Newmills which is situated approximately 1km north-west of Coalisland along the Brackaville Road.

The site exists as undeveloped lands in the countryside situated on the eastern edge of the Settlement Development Limit however not located within any designated/sensitive locations as defined within the Dungannon & South Tyrone Area Plan, 2010.

In relation to the surrounding context the immediate area is largely characterised by residential development with an existing housing development completed to the west and single dwellings to the north and east. Although located in the countryside, it is clear the plot exhibits the essential characteristics of a natural extension to the settlement limit particularly as the site is bound on all sides by existing residential development. Further to this, the site has a relatively flat topography and is not affected by historical flooding or associated archaeological constraints (see Annex 1).

Summary

We would respectfully request that our client's lands located at Brackaville Road, Newmills are included within the SDL of Newmills and zoned housing/whiteland within the emerging Local Development Plan for the strategic and site-specific reasons outlined above.

We believe there is a compelling case for the lands to be zoned to assist the Council in increasing the amount of housing delivered within the wider Dungannon/Coalisland area.

I trust the above is helpful to the Council in progressing the draft Plan Strategy and look forward to further input as appropriate as the Plan progresses.

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CLYDE SHANKS

Planning Development

Yours Sincerely,



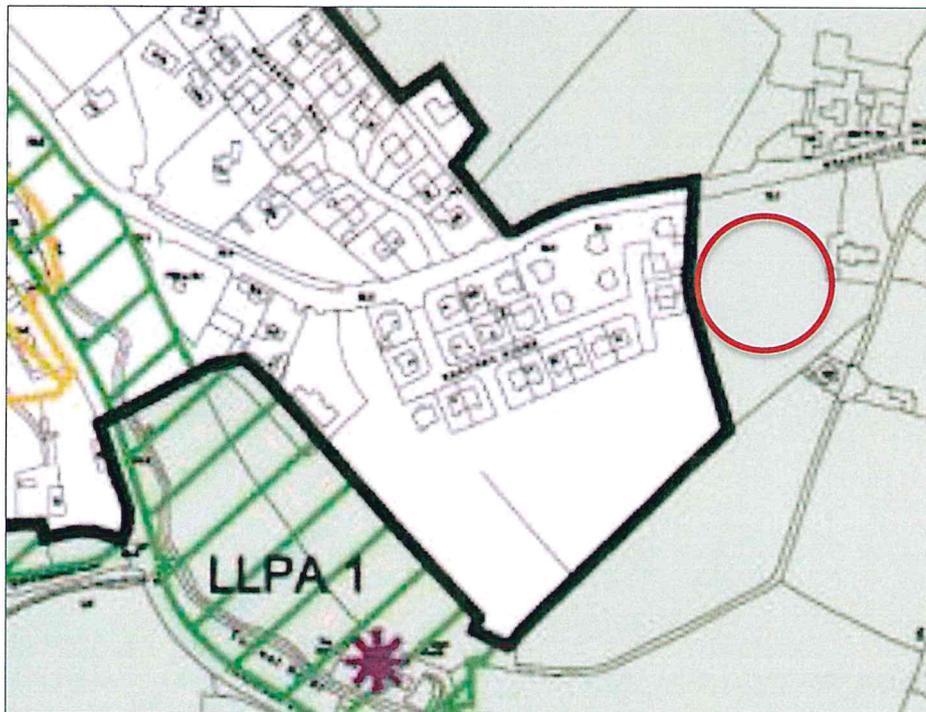
Conor Cochrane
Senior Planner

cc. Mr Williamson
Enc. Annex 1

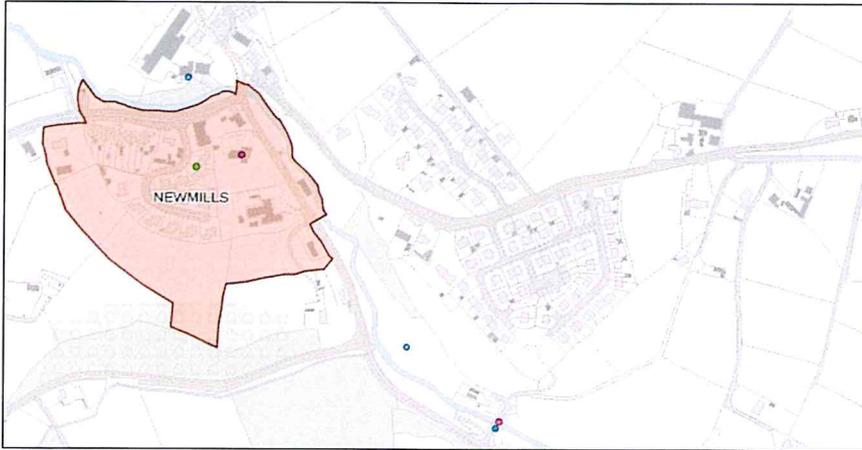
Annex 1: Site Context (Aerial and Area Plan Extract)



Site Context/Environmental Matrix	
Proposal	Lands for Housing
Area (ha)	1
Access	Brackville Road
Topo	Slight slope W to E
Boundaries	Existing hedgerow
WWTW	Unknown
Potential Yield	15 units (approx.).



DfC NIEA Built Heritage Viewer – No associated archaeological constraints



DAERA Flood Map – no flooding identified

