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## Consultation Period

Antrim and Newtownabbey Borough Council has published its draft Plan Strategy, the first formal stage of the new Local Development Plan 2030, for public consultation.

The draft Plan Strategy is the first of two documents, which comprise the Local Development Plan 2030. It has been developed following extensive engagement with the public, stakeholders and our elected Members, including the publication of our Preferred Options Paper.

The draft Plan Strategy sets out how our Borough will grow and change up to the year 2030. It puts forward our Plan Vision for the future. It also contains a Spatial Growth Strategy indicating at a strategic level where growth should go in the Borough. It also sets out a range of Strategic Policies and Detailed Management Policies, which together will guide future planning decisions.

The draft Plan Strategy is published for formal public consultation over an 8-week period and the Council is inviting the submissions of representations, beginning on **Friday 26 July and closing on Friday 20 September 2019 at 5pm.**

The submission of representations in relation to the Council's draft Plan Strategy provides an opportunity for the public to influence the policies and proposals for the future planning and development within Antrim and Newtownabbey.

***Please note that representations received after the closing period will not be accepted and will be subsequently returned.***

Published alongside the draft Plan Strategy are a range of assessments including Sustainability Appraisal (incorporating the Strategic Environmental Assessment), a draft Habitats Regulation Assessment and an Equality (Section 75) Screening and Rural Needs Impact Assessment Report. These assessments are also subject to public consultation during the formal public consultation period closing on Friday 20 September 2019 at 5pm.

Copies of the draft Plan Strategy and all supporting documents are available to view and download from our website at:

[www.antrimandnewtownabbey.gov.uk/draftplanstrategy](http://www.antrimandnewtownabbey.gov.uk/draftplanstrategy).

Copies of all documents are also available for inspection at the Council Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8.30am to 5pm. Hard copies of the draft Plan Strategy are also available upon request.



## Soundness Testing

A key feature of Northern Ireland's new Planning System is 'Soundness' which requires the draft Plan Strategy document to be tested at Independent Examination (IE) in terms of content, conformity and the process by which it has been prepared. Derived from established practices in England and Wales, it is considered that 'Soundness' testing will provide a more effective basis for examining Local Development Plans and consequently contribute towards a shorter IE process.

The purpose of the IE is to determine if the draft Plan Strategy satisfies statutory requirements and is 'sound'. The presumption will be that the draft Plan Strategy is 'sound' unless it is shown to be otherwise as a result of evidence considered at the IE stage.

The tests of soundness are based upon three categories which relate to how the draft Plan Strategy has been produced, the alignment of the document with central government regional plans, policy and guidance and the coherence, consistency and effectiveness of the content of the draft Plan Strategy. The tests of soundness are set out below:

<b>Procedural Tests</b>	
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?
<b>Consistency Tests</b>	
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?
<b>Coherence and Effectiveness Tests</b>	
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.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.
<b>*Development Plan Document (DPD) – Comprises of the draft Plan Strategy</b>	

Further information on Soundness can be found in Development Plan Practice Notes published by the Department for Infrastructure (DfI). Of particular relevance is Practice Note 6 'Soundness' (Version 2) and Practice Note 9 'Submission and Handling of Representations', both are available to view at <https://www.infrastructure-ni.gov.uk/publications/development-plan-practice-notes>.

In addition, the Planning Appeals Commission has also produced guidance entitled 'Procedures for Independent Examination of Local Development Plans' available at <https://www.pacni.gov.uk/procedural-guides>.

## Making a Representation

As the main purpose of the IE is to determine whether the Development Plan Document (DPD) is 'sound', any person(s) wishing to make a representation to any part of the Plan should do so on the grounds of soundness. Any representation proposing a change to the Plan must demonstrate why the document is not sound having regard to the tests of soundness. Every representation should say precisely how the Plan should be changed in order to achieve soundness and should be supported, succinctly, by all the evidence thought necessary to justify the proposed change. Once the public consultation period has closed, **there will be no further opportunity to submit information unless the Commissioner requests it.**

Where several people share a common view on how the draft Plan Strategy should be changed, we encourage you to co-operate with each other, pool resources and make a single representation, for example, a local community group.

Those who make representations to the draft Plan Strategy should state whether they wish to have their representation considered at IE in writing or as an oral hearing. Unless people specifically request an oral hearing, the Commission will proceed on the basis that you are content that your representation will be considered in writing. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orally or in written form.



## Points to Remember:

- Representations will be made publicly available for inspection at the Council's Offices and online for counter-representations;
- Complete all relevant sections of the response form;
- Clearly state why you consider the draft Plan Strategy to be 'unsound', having regard to the soundness tests;
- There will be no further opportunity to submit information once the public consultation period closes unless the Commissioner requests it;
- We would encourage you to submit separate forms for each representation you wish to submit;
- Every representation should say precisely how the draft Plan Strategy should be changed in order to achieve soundness;
- Representations should be supported, succinctly, by all the evidence thought necessary to justify the proposed change; and
- Clearly, state whether you wish for your representation to be heard orally or in writing.

## Submitting Your Representation

We recommend that you submit your representation via our on-line consultation hub, at [www.antrimandnewtownabbey.gov.uk/consultations](http://www.antrimandnewtownabbey.gov.uk/consultations), as this is the most efficient way to make a representation.

However, you can make a representation by completing this form and returning to us by **5pm on Friday 20 September 2019** either by email or by post.

**Representations received after the closing period will not be accepted and will be subsequently returned.**

## What Happens Next

When the consultation has closed, the Forward Planning Team will collate the representations received and as soon as reasonably practicable, publish these online for a further 8-week period of consultation to allow counter-objections to be made. The representations will also be available for public inspection during this period at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to 5pm.

Once this period of counter-representations has closed, the Forward Planning Team will collate the counter-representations and publish these online. They will also be made available for public inspection at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to



5pm. The next anticipated step will be for the Council to contact the Department for Infrastructure to request an Independent Examination of the draft Plan Strategy.

## Contact Us

For further assistance, please contact the Forward Planning Team at Mossley Mill, Newtownabbey:

**By Post** – Forward Planning Team

Mossley Mill

Carnmoney Road North, Newtownabbey

BT36 5QA

**By Email** – [planning@antrimandnewtownabbey.gov.uk](mailto:planning@antrimandnewtownabbey.gov.uk)

**By Telephone** – 0300 123 6677



## SECTION A – DATA PROTECTION AND CONSENT

Antrim and Newtownabbey Borough Council complies with the General Data Protection Regulation (GDPR) by producing a specific Local Development Plan Privacy Notice, which lets you know how we manage any personal information we receive from you. It contains the standards you can expect when we ask for, or hold, your personal information and an explanation of our information management security policy.

The Local Development Plan Privacy Notice can be found on our website at [www.antrimandnewtownabbey.gov.uk/gdpr/planning-gdpr/](http://www.antrimandnewtownabbey.gov.uk/gdpr/planning-gdpr/).

**Please note that when you make a representation (or counter-representation) to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the Council's website.**

Copies of all representations will be provided to the DfI and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for Independent Examination. A Programme Officer will also have access to this information during the IE stages of the Plan preparation

DfI, the Programme Officer the Independent Examiner will, upon receipt, be responsible for the processing of your data in line with prevailing legislation.

1. Please tick to confirm that you have read and understood the Council's Local Development Plan Privacy Notice.

I confirm that I have read and understood the Local Development Plan privacy notice and I give my consent for Antrim and Newtownabbey Borough Council to hold my personal data for the purposes outlined.

You can contact the Council's Data Protection Officer via:

**Post** - Antrim Civic Centre, 50 Styles Way, Antrim BT41 2UB

**Email** - [DPO@antrimandnewtownabbey.gov.uk](mailto:DPO@antrimandnewtownabbey.gov.uk)

**Phone** - 028 9446 3113



## SECTION B – YOUR DETAILS

2. Please specify if you are responding as an individual, as an organisation, or as an agent acting on behalf of an individual, group or organisation?

*If you are responding as an agent or representing an organisation you will be the main point of contact for your client/organisation.*

*(Please select only one item)*

- Individual  
 Organisation  
 Agent

	Personal Details	Agent Details (If Applicable)
<b>Title</b>		Mr
<b>First Name</b>		David
<b>Last Name</b>		Dalzell
<b>Job Title (where relevant)</b>		Chartered Landscape Architect and Chartered Town Planner
<b>Organisation (where relevant)</b>		David Dalzell CMLI MRTPI
<b>Client Name (where relevant)</b>		Various
<b>Address</b>		"Fairview" 10 Fairview Lane Articlave Coleraine
<b>Post Code</b>		BT51 4JX
<b>Telephone Number</b>		07714 798607
<b>Email Address</b>		d.dalzell@tinyworld.co.uk



## SECTION C – REPRESENTATION

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 draft Plan Strategy does your representation relate?

i) Paragraph Number: **see below**

ii) Policy Heading: **Employment, Homes, Historic Environment, Natural Heritage,**

**Natural Resources**

➤ Strategic Policy (SP) Paragraph Number: **SP2.11, SP2.15, SP 8.5, SP8.6**

➤ Detailed Management Policy (DM) Paragraph Number: **DM5.38, DM9.2,**

**DM9.4, DM9.6, DM9.8, DM18.10, DM31.2, DM40.6, DM44**

iii) Page Number in Document: **see below**

iv) Proposal Map (if relevant state location): **Fig 13: Strategic Lignite Reserve**

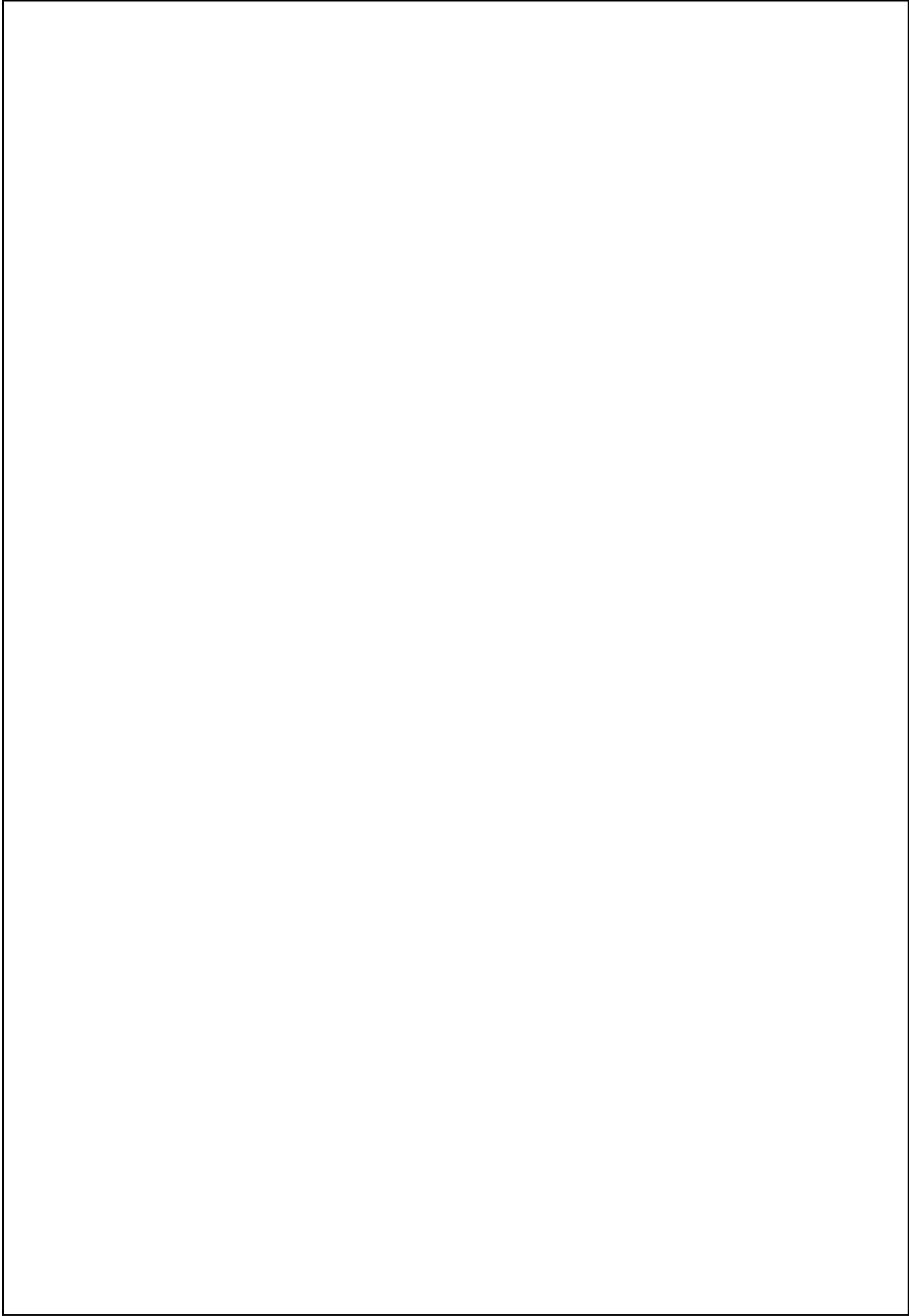
4. Do you consider the draft Plan Strategy to be:

'Sound' (*i.e. support*)

'Unsound' (*i.e. object*)

5. If you consider the draft Plan Strategy to be '**SOUND**' and wish to support the draft Plan Strategy, please set out your comments below.





*(Continue on a separate sheet if necessary)*



6. If you consider the draft Plan Strategy to be '**UNSOUND**' please identify which test(s) of soundness your representation relates to having regard to the Department for Infrastructure's published Development Plan Practice Note 6 'Soundness' (Version 2).

**Soundness Tests:**

- P1** - Has the DPD<sup>1</sup> 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?
- 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 DPD had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining Council's district?
- CE1** - Does 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 DPD's of neighbouring Councils?
- CE2** - Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?
- CE3** - Are there clear mechanisms for implementation and monitoring?

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<sup>1</sup> Development Plan Document (DPD) – Comprises of the draft Plan Strategy



**X CE4** - Is it reasonably flexible to enable it to deal with changing circumstances?

**Details**

7. Please give details of why you consider the draft Plan Strategy to be **'UN SOUND'** having regard to the test(s) you have identified above. Please be as concise as possible.



*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. **This representation will be considered during the IE**

## Strategic Policy 2 - Employment

**p78. Agricultural Sector SP 2.11:** some indication should be provided as to what will be deemed an “appropriate” farm diversification scheme (not necessarily a definitive list). Otherwise each proposal should be treated on a case by case basis, on its merits. The latter option is preferable and is more flexible to deal with changing circumstances (Soundness Test CE4).

**p80. Sustainable Tourism SP 2.15 (c):** The phrase, “exercising appropriate control over the development of holiday chalets, cabins, caravan and camping sites..” is unduly negative (particularly the word “control”), and implies that such development may be undesirable or unsustainable. The opposite is true; such development can sustainably provide the accommodation required to develop tourism in the area and create opportunities for more overnight stays, with minimal landscape and visual impact (ref: Evidence Paper 5 – Tourism).

**p95 Farm Diversification DM5 5.38:** Farm diversification should not be limited to re-use of existing buildings only; sometimes new buildings will be required. The range of activities listed could also include the sort of business requiring a rural, contamination-free location as listed in DM3 5.33, page 93). Research and development and life sciences/laboratories could be ideally located in farm diversification projects, particularly as there will often be an established landscape setting of trees and hedgerows to help integrate the development into the rural scene. Large modern agricultural buildings, which may be obtrusive, could be replaced by a “clusters” of new buildings in well-landscaped campus environment which is more sympathetic to the rural setting. (CE4)

**p104 Tourism Development DM9 9.2 (Countryside Locations):** The council should support proposals that provide new and enhanced tourist amenities, and the extension of existing tourist amenities. As it is not clear however, from the wording of 9.2 whether all four criteria (a) to (d) must *all* be met to satisfy this policy implementation could be difficult. (CE3)

**p104 New Hotels and Guesthouses DM 9.4** could be located in many locations in the rural area, as sites and opportunities arise and should not be tied to a specific locational need. (CE4). These could be a valued addition to the portfolio of farm diversification initiatives.

**p104 Tourist Accommodation DM9 9.6 (Self catering chalets, holiday cabins and caravan or camping sites):** This section is self-contradictory: it will not be possible to create a “new” caravan site, for example, if it must “form an extension to existing tourist accommodation sites” (DM 9.6 (a)). It is not clear if a proposal must comply with only one of the first three criteria (a) to (c), or either all three (a-c) or (d). It is a very specific location that has existing tourist accommodation (which we know from studies of the area is lacking in the borough), an associated hotel and an existing tourist attraction or recreation facility. With criteria (d) the woodland setting is overly restrictive. There may be significant natural or built features (tree belts and hedgerows for example) that are not defined as “woodland” yet still have the “capacity to absorb a holiday park development”, as stated in Planning Policy Statement 16 TSM 6. (Soundness Test CE4)



**p105 Tourist Accommodation DM9 9.8 (holiday use conditions):** This section is unnecessary as all holiday parks must be licenced by the council, under parallel but separate legislation. This licence is usually for an 11-month period in the year (to prevent holiday accommodation becoming permanent residences). Soundness Test C4.

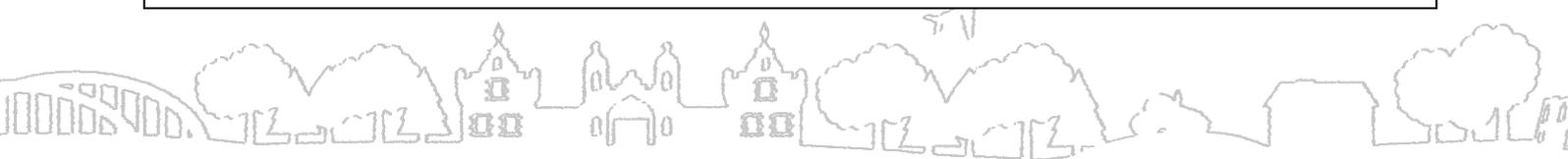
**p150 Replacement Dwellings DM18B 18.10 (replacement of agricultural buildings):** There is no explanation (or evidence base) provided to justify this strategy. Why is the replacement of an agricultural shed any different to the replacement of a redundant non-residential building, like a workshop or stables, for example? If there are environmental gains (such as improvements to the visual setting and/or removal of dereliction, such replacements could make a positive impact on the borough. There are instances of “temporary” buildings such as park homes or static caravans having been used as dwellings for a considerable period – these should be eligible for replacement so that the occupant’s overall quality of life may be improved. (CE2)

**p213 Historic Parks, Gardens and Demesnes, Policy DM31.2 (b):** The nature of historic parks and gardens is to change over time. There may be an “original design concept” (if it is known) but there is likely to have been much subsequent redesign and reconfiguration over time. Account of this should be taken when considering the impact of development proposals. Policies surrounding historic gardens, parks and demesnes should not be overly restrictive. Generally these estates have a strong, mature landscape structure providing screening and the capacity to absorb sympathetic and high quality development, without loss to the overall character or impact on the setting of the listed buildings within the estate. (CE4)

**p237 Strategic Landscape Policy Areas, Policy SP 8.5/8.6:** There is a risk that planning policy could be overly restrictive in these areas, which are already well-protected from harmful development by extant SAC/ASSI/RAMSAR designations. The Council should promote access to Lough Neagh for tourist activity as this is a major (and at present under-utilised) tourist attraction. There is capacity along the lough shore, in carefully selected locations, for new access points to the water, improvements to existing marinas and harbours, and for enhanced public access generally. (CE2/CE4)

**p252 Strategic Landscape Policy Areas, Lough Neagh & Lough Beg Strategic Landscape Policy Area DM 40.6:** There is a risk that “strict control” could prevent sympathetic developments that will enhance visitor experience, improve access to the lough and take pressure off the very few existing points of access to the water. The term “low intensity recreational or tourism use” is vague and unhelpful. Different parts of the lough may suit active watersports and in other parts human access may not be desirable at all (for site-specific environmental considerations, priority species habitat etc.) Each proposal should be assessed on merit, on a case by case basis (CE2/CE4).

**p270 Mineral Reserve Policy Area DM44:** A presumption against development in this area, in favour of mineral extraction with unknown (but potentially adverse environmental impacts) is unsound and will stymie potential Farm Diversification projects (DM5) and Tourism (DM9) that could enhance the area and provide the employment opportunities needed now. The extent and greater long-term value of the lignite reserve as a fossil record (with regionally significant mammoth remains found in Aghnadarragh ASSI) is not fully known has not been considered. (CE4)



## Modifications

8. If you consider the draft Plan Strategy to be '**UN SOUND**', please provide details of what, if any, modifications do you think should be made to the section, policy or proposal which your representation relates to? What specific modifications do you think should be made in order to address your representation? Please briefly state how your proposed alternative would meet the requirements of the Sustainability Appraisal and other published assessments.

### Strategic Policy 2 - Employment

**p78. Agricultural Sector SP 2.11:** Appropriate farm diversification schemes could include employment and tourism uses. Certain types of retail (e.g. farm and equestrian shops) are usually more appropriate in the rural area than in town centres.

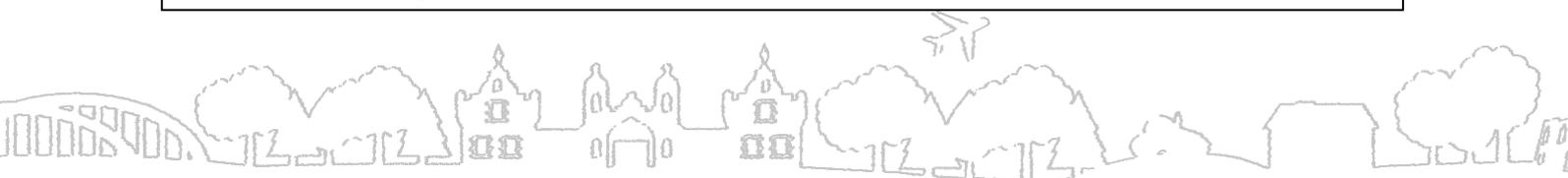
**p80. Sustainable Tourism SP 2.15 (c):** The phrase, "*exercising appropriate control over the development of holiday chalets, cabins, caravan and camping sites..*" could be modified to say "*supporting the establishment of new or extended high quality holiday chalet, cabins, caravans and camping sites in appropriate locations*".

**p96 Farm Diversification DM5:** A suggested addition ("DM 5.4") could read, "*new buildings may be required depending on the type and function of the proposed diversification activity, for example to ensure a modern, contamination-free environment. Existing trees and hedging around the farm should be retained wherever possible and augmented with new high quality landscape planting of native species appropriate to the location. The Council will support the replacement of modern agricultural buildings with new buildings where these new buildings respect the surrounding landscape, rural character and site context*".

**p104 Tourism Development DM9 9.2 (Countryside Locations):** The wording of 9.2 could be made clearer, i.e. to state, "*...and the proposal meets, as a minimum requirement, one of the following four criteria:*" An additional criteria should be added: "*(e) located convenient to an existing tourist accommodation site.*"

**p104 New Hotels and Guesthouses DM 9.4 :** The wording should be amended to, "*The Council will support new hotels and guesthouses in the countryside where new or refurbished buildings and associated parking and access, can be integrated into the surrounding landscape, with design of high quality*".

**p104 Tourist Accommodation DM9 9.6 (Self catering chalets, holiday cabins and caravan or camping sites):** This section should borrow from PPS16 TSM6, which has generally worked well. It should read, "*Proposals for new, enhanced or extended holiday or caravan parks, cabins, self-catering chalets, camping sites and similar, will be supported where they will create a high quality and sustainable form of tourism development. The location, siting, size, design, layout and landscaping of the holiday park (or similar) proposal must be based on an overall design concept that respects the surrounding landscape, rural character and site context. They could also form extensions to existing tourist accommodation sites, or be physically associated with an existing hotel or support an existing tourist attraction or recreational facility, as examples but this list is not exhaustive. Sites within established woodland, with a strong landscape setting, are particularly suitable for this type of development*".



**p150 Replacement Dwellings DM18B 18.10 (replacement of agricultural buildings):** This section (DM 18.10) should be deleted. Alternatively, to accord with the wording of Policy DM 18F DM18.25 it could be amended to, *“However in all cases modern sheds and stores designed for agricultural purposes will not be eligible for replacement with dwellings under this policy. Temporary buildings, park homes and static caravans (where these have been used as dwellings for a minimum period of 5 years) will be eligible for replacement under this policy”*.

**p184 Strategic Policy 6: Placemaking and Good Design:** *“Landscape Architects”* should be added to the list of those the council will work with (architects, urban designers, engineers and developers) in this regard. Our profession has a key role to play in placemaking, particularly in the design of green and blue infrastructure, tree planting, woodland creation, public realm and access to the countryside.

**p213 Historic Parks, Gardens and Demesnes, Policy DM31.2 (b):** This should read, *“The site’s original design concept, how it has changed over time, overall quality and setting”*. It should also be stated, *“The Council will support high quality, sympathetic development within historic gardens, parks and demesnes that will not harm the overall setting”*. Appropriate economic and tourism development can provide a financial lifeline that estates need to survive. Ultimately the owners are the custodians of the valued landscapes we are trying to protect. Draft Policy DM35 Enabling Development is welcomed in this regard.

**p237 Strategic Landscape Policy Areas, Policy SP 8.5/8.6:** It should be stated that *“Council will support new facilities, or extensions to existing facilities around Lough Neagh where it is demonstrated that the proposal will create a high quality and sustainable form of tourism development”*.

**p252 Strategic Landscape Policy Areas, Lough Neagh & Lough Beg Strategic Landscape Policy Area DM 40.6:** The term *“low intensity recreational use or tourism proposals”* should be amended to *“High quality and sustainable tourism proposals. The type, location, siting and design of the proposal must respect the surrounding landscape policy area, designated areas and habitats.”*

**p270 Mineral Reserve Policy Area DM44.1 and 44.2 should be changed to read,** *“The Council will operate a presumption in favour of the physical preservation in-situ of the lignite reserve. It is recognised that the environmental impacts of lignite extraction are not fully known and in the meantime proposals for appropriate development in this area, which will stimulate economic growth will be supported by the Council. The Council will support [in addition to (a) and (b) already stated]:*

*(c) proposals for employment use, farm diversification or tourism facilities and accommodation within this area that meet other relevant policies of the LDP.*

*(Continue on a separate sheet if necessary)*



9. If you are seeking a change to the draft Plan Strategy, please indicate how you would like your representation to be dealt with at Independent Examination:

*Please Note: Unless you specifically request an oral hearing, the Commission will proceed on the basis that you are content to your representations considered in written form only. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orally or not.*

Please select only one item;

Written Representation

Oral Hearing

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Signature:

[Redacted Signature]

Date:

20 September 2019

Thank you for your response.

