

Submitted to **Local Development Plan 2030 - Draft Plan Strategy Representations**

Submitted on **2019-09-20 16:40:04**

SECTION A - DATA PROTECTION AND CONSENT

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.:

Yes

SECTION B - CONTACT DETAILS

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?

Respondent Type:

Organisation

Please specify your contact details:

Title:

Mr

First name:

Simon

Last name:

Moon

Job Title (where relevant):

Commercial Property & Development Manager

Organisation Name (where relevant):

Karl Property Investments Ltd

Agent Name (If applicable):

1986

Client Name (If applicable):

1986

Address:

92 Old Ballyrobin Road

Muckamore

Postcode (please enter your full postcode):

BT41 4TJ

Telephone number:

02894425600

What is your email address?

Email:

simon.moon@karl.co.uk

Please Read Before Continuing. . .

SECTION C - REPRESENTATIONS

Do you consider the draft Plan Strategy to be SOUND or UNSOUND?

I consider it to be 'Sound'

Sound Representation

If you consider the draft Plan Strategy to be SOUND and wish to support the document, please set out your comments below:

Sound Justification:

We believe that the information submitted at the POP submission stage still to be relevant with regards to the attached document for Karl Business Park and titled 'C03677 - Karl Business Park - POP representation'

We own lands around the business park which could also be considered for the wider development of the park as an SEL.

The site has be established for 30 plus years offering a strategic location for existing economic development.

We would support Karl Business Park's consideration under Policy DM 1 and DM 2 but not limited to these.

Furthermore, given the close proximity to BIA, Karl Business Park should be considered as part of the same SEL.

Upload File:

C03677 - Karl Business Park - POP representation.pdf was uploaded

Would you like to submit another representation?

Yes

Additional Representation 2

What does your second representation relate to?

An 'Unsound' representation

Representation 2 - UNSOUND

Please identify which section of the draft Plan Strategy you consider to be UNSOUND:

Paragraph Number in Document:

DM 13

Policy Heading:

Belfast International Airport

Strategic Policy (SP) Paragraph Number:

Detailed Management Policy (DM) Paragraph Number:

13.1 & 13.2

Page Number In Document:

124

Proposal Map (If relevant state location):

Under which test(s) of soundness do you consider this to be UNSOUND:

CE2 - Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?,
CE4 - Is it reasonably flexible to enable it to deal with changing circumstances?

Please give details why you consider the draft Plan Strategy to be UNSOUND having regard to the test(s) you have identified above.

Unsound Justification:

The Airport should not be allowed to expand without first giving consideration to existing commercial properties within the vicinity, therefore not creating demonstrable harm to the environment if exciting properties are worthy of supporting the use.

File upload:

No file was uploaded

Modifications

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.

Modifications:

Consideration giving to existing commercial sites/properties within the vicinity

File Upload:

No file was uploaded

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

Written Representation

Would you like to submit another representation?

Yes

Additional Representation 3**What does your third representation relate to?**

A 'Sound' representation

Representation 3 - SOUND**If you consider the draft Plan Strategy to be SOUND and wish to support the document, please set out your comments below:****Sound Justification:**

With regards to our submission as POP we believe the attached document titled 'C03676 - Muckamore House POP submission' still to be relevant to Strategic Policy 4.

The current development limit of the Antrim should reflect this site a natural rounding off of the boundary.

Furthermore consideration should be considered for a separate Muckamore village plan in connection with this area along with the former mill off Sevenmile Straight.

We would query that DM 17 .3 should be considered only if there is a recognised need from NIHE.

Upload File:

C03676 - Muckamore House POP submission.pdf was uploaded

Would you like to submit another representation?

No

12th April 2017

Our Ref: C03677

Planning Section
Antrim & Newtownabbey Borough Council,
Mossley Mill
Newtownabbey,
BT36 5QA

Dear Sir/Madam,

Re: Antrim and Newtownabbey Council Local Development Plan – Response to the Preferred Options Paper for lands located at Karl Business Park, Old Ballyrobin Road, Antrim.

This letter is submitted on behalf of our client, Karl Property Investments Ltd., and relates to the publication of the Preferred Options Paper (POP), the first stage in Antrim & Newtownabbey Borough Council's Local Development Plan process. On behalf of our client, we wish to formally respond to specific preferred options that the Council have identified and in addition to this draw your attention to specific lands that we believe should be identified as an important rural enterprise where sustainable growth should be encouraged.

Economic Development in the Countryside

We note that within the POP, the Council has proposed to designate Nutts Corner as a Rural Strategic Employment Location (as it is one of the key rural employers in the area and benefits from excellent access to key transport links). The Council's rationale for the proposed designation is to encourage suitable employment opportunities at this key location, to ensure that new development does not impact upon the local countryside and to consider whether key site requirements should be prepared for future development at this location.

While we don't disagree with such a designation, we feel that in order to sustain a vibrant rural economy across the entire Council area and to encourage suitable rural employment growth, a second tier zoning such as "Local Rural Enterprise/Employment Zones" should be introduced.

Such zonings could be for medium-scale existing rural economic developments that are not of the same 'strategic' scale of Nutts Corner but are still, nevertheless, key contributors to the local rural economy. The same rationale and justification used for the designation of Nutts Corner as a Rural Strategic Employment Location applies to smaller-scale rural employment nodes – i.e. to encourage suitable new employment opportunities and to ensure new development does not impact upon the local countryside.

Suggested 'Rural Enterprise/Employment Zones'

We feel that a special zoning or designation should be introduced for smaller scale rural employment centres such as Karl Business Park (see attached map), so that future employment growth can be encouraged at key rural locations. Karl Business Parks is an established business park that extends to 12 acres in size, with the demand and opportunities for expansion and growth.

It has excellent access to key transport routes and good connectivity to both Nutts Corner (a proposed Strategic Employment Location) and also the International Airport. Given this location, the business park is ideally located to provide support and complementary services to both major employers and also function as an important local rural employment node in its own right.

The business park currently contains 6 buildings, with a combined 40,000 ft² of floorspace. These buildings are flexible and adaptable and could accommodate storage or general industrial uses. There are a number of existing businesses on site, including:

- Ballyrobin Business Centre (14 serviced offices suites);
- Steinhoff Group (distributors for Bensons for Beds and Harveys);
- BHB Safety Specialists;
- Hannon Steel; and
- The Karl Group Head Office.

The site has a history of planning permissions being granted for industrial, commercial and storage/distribution uses. Permissions for industrial and commercial uses stretch back over 25 years to 1992/93, when consents were granted for workshops and offices (specifically, approval ref. T/1991/0630 and T/1992/0322). Considering this history, employment uses on site are well-established.

More recent permissions include consents for a distribution warehouse in 2008 (approval ref. T/2008/0678/O); the erection of 4 No. distribution warehouse units in 2009 (approval ref. T/2008/0585/F) and the replacement of an office block in 2009 (approval ref. T/2008/0526/F). These permissions have been implemented on site and marked a significant expansion of the business park. These previous consents also demonstrate that the business park is still an attractive location for local businesses and that there is high demand from local firms to expand the current business park.

The business park has the physical attributes of a well-established rural enterprise, characterised by a number of large industrial buildings, office buildings and hard-standing areas. Indeed, the business park should be considered as a 'brownfield' site in the countryside, given it's built from, associated hard-standing areas and recent planning history. Despite this built-up character, the business park does not adversely impact upon the rural character of the area. The business park is well-screened from all public viewpoints and the buildings on site are set well-back from the road frontage.



Existing site frontage to Old Ballyrobin Road, buildings screened behind slope and existing vegetation/trees.

There is sufficient scope for expansion of the business park, which is required to ensure the rural enterprise reaches its full potential. As can be seen in the following aerial images, the large areas of hard-standing and waste ground are currently under-utilised by the existing occupants of the business park. By encouraging appropriate new development on site (through the designation of the site as a 'rural enterprise/employment zone'), there would be the potential to attract new users to the business park or encourage the expansion of current site users. This would result in sustainable development, as any new development would be within the confines of the existing business park and use what is, in effect, brownfield land (i.e. the hard standing areas).



Aerial image of existing business park, with under-utilised hard-standing areas.



Aerial image of existing buildings and hard-standing areas on site.

Employment and Industry Policy

We note the Council's preferred option (option 3) in relation to Planning Policy (section 6 in the POP). We agree with the preferred option to review existing policies, with a view to developing succinct up-to-date and tailored policies. We would suggest that this preferred option would allow the Council to introduce bespoke rural enterprise/employment policies that could apply to our suggested 'rural enterprise/employment zones'.

Current relevant PPS4 policies (such as policy PED3, PED4, PED5 and PED6) are all generally permissive of expanding existing and developing new economic developments in the countryside. However, all these policies have associated criteria that need to be considered and met prior to the granting of planning permission. These criteria are overly onerous in places, especially in the context of locating a new business within an already established business park such as the Karl Business Park.

By identifying and designating 'rural enterprise/employment zones', the Council has the opportunity to consolidate all these separate policy requirements and tailor them to encourage suitable and sustainable rural economic development, whilst also responding to and protecting site specific features by way of key site requirements that could be associated with each 'rural enterprise/employment zone'.

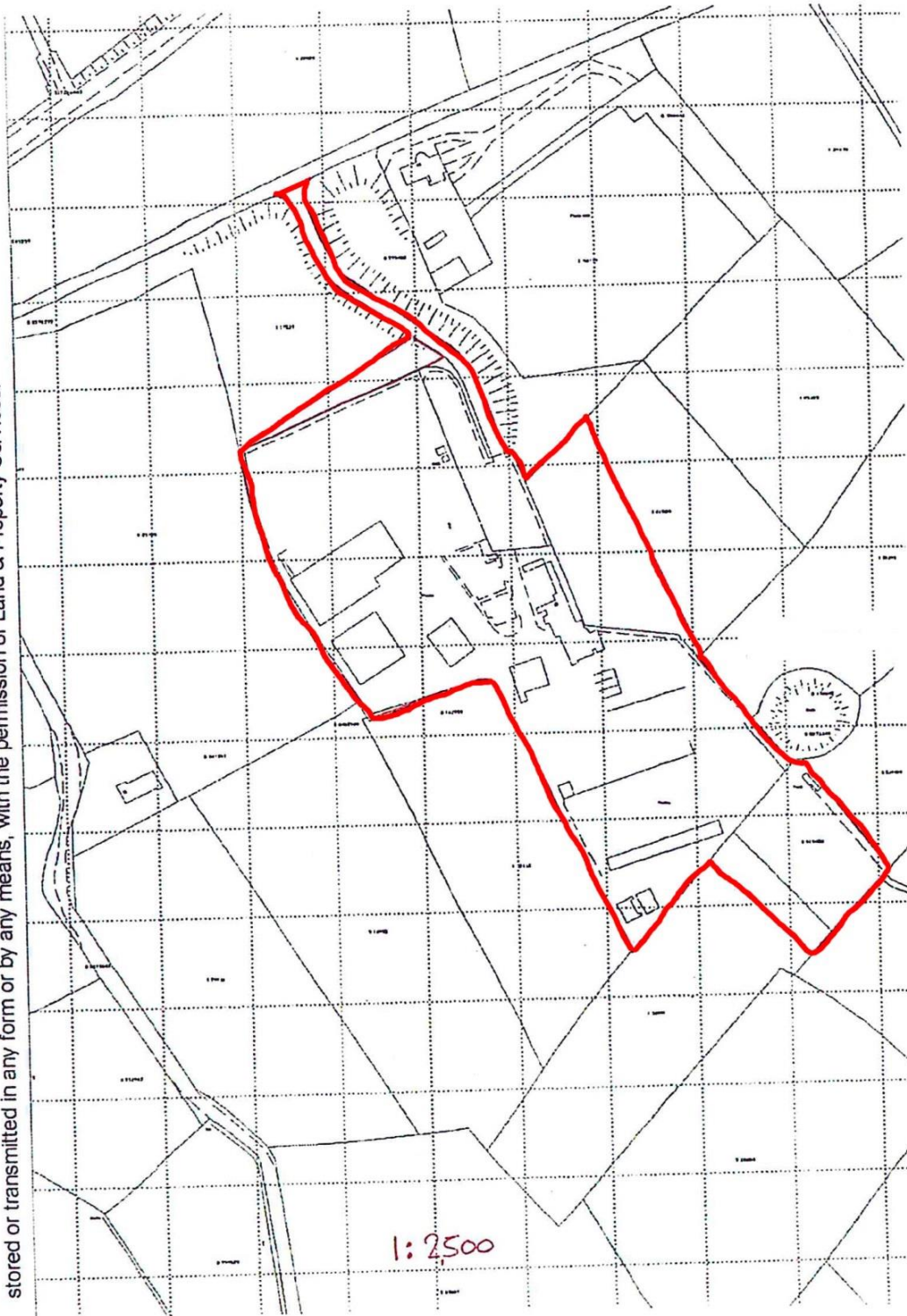
Such an approach is also in keeping with the Council's proposed overarching primary principle 1 – sustainable economic growth (paragraph 6.17 of the POP). By developing and concentrating growth to existing and established rural enterprises, through the designation of 'rural enterprise/employment zones', a more sustainable approach to rural economic growth can be achieved by promoting and targeting growth to suitable and sustainable rural locations.

We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as the LDP progresses.

Yours Sincerely

Helena McDonnell
Strategic Planning

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12th April 2017

Our Ref: C03676

Planning Section
Antrim & Newtownabbey Borough Council,
Mossley Mill
Newtownabbey,
BT36 5QA

Dear Sir/Madam,

Re: Antrim and Newtownabbey Council Local Development Plan – Response to the Preferred Options Paper for lands located at Muckamore House, Antrim.

This letter is submitted on behalf of our client Karl Property Investments Ltd relates to the publication of the Antrim & Newtownabbey Borough Council (POP) which was launched by the Council on the 18th January 2017. On behalf of our client, we wish to formally respond to specific preferred options that the Council have identified and in addition to this draw your attention to specific lands that we have identified as being suitable for inclusion within the settlement development limits of Antrim.

Stage One – Determining the Amount of Housing Growth

Antrim and Newtownabbey's preferred option for the total housing growth for the Council area during the next Local Development Plan period, Option 4, is derived from an average of the HGI rate of 554 dwellings per annum and the pre-crash build rate of 748 dwellings per annum, predicting an assumed annual average build rate of 650 dwellings, a total of 13,000 dwellings (including additional 5 year supply).

Option 3, with an overall growth figure of 14,960, is however considered more appropriate to accommodate housing growth within the borough between 2015 – 2030 and should therefore be the Council's preferred option.

Like Option 4, it is higher than the most recent Housing Growth Indicator (HGI) figures for the council area indicated in regional guidance. Option 3, however, is based on the pre-recession build-out rates and therefore gives a higher allocation which provides for greater flexibility in the plan than the current preferred option would otherwise allow.

This additional allocation is necessary due to the ambitious growth plans of the neighbouring council area of Belfast (with a projected growth rate of 37,000 over the plan period, which is over double the regional HGI for Belfast). Many settlements within the Antrim and Newtownabbey Council area act as commuter towns for Belfast and considering the physical restrictions on growing the Greater Belfast area, it is inevitable that there will be knock-on effects upon Antrim and Newtownabbey settlements due to the ambitious growth plans of Belfast.

It is therefore necessary to add 15% to the preferred Option 4 allocation figure of 13,000 dwellings for the Antrim and Newtownabbey Council area to account for Belfast's projected growth. This equates to a growth figure of 14,960, which is the Option 3 growth figure.

Such an approach is in line with statutory requirements under section 3(4) and 3(5) of The Planning Act 2011, which requires Councils to consider how the plans of neighbouring districts may affect the Council's own plans. We note that there is a lack of reference to consideration of Belfast's growth plans in the Antrim and Newtownabbey Borough Council Preferred Options Paper.

Stage 2 - Housing Growth Allocation

We would agree in principle with Preferred Option 1 which is to grow local towns and selected villages. However, based on option 3 in relation to overall growth, table 6 of the POP needs to be updated. The revised figures are shown in brackets in Table 6 below.

Table 6: Growth allocation Option 1

Location	Growth Allocation Option 1 (+15%)	Existing Housing Land Supply (01/04/2015)	Balance of Allocation and Supply	Existing number of dwellings (Census 2011)	Option 1 Growth Rates
Metropolitan Newtownabbey	4,400 (5,060)	4,434	34 (-626)	27,371	16% (19%)
Antrim	3,500 (4,025)	3,509	9 (-516)	9,978	35% (40%)
Ballyclare	1,600 (1,840)	3,503	1,903 (1663)	4,184	38% (44%)
Crumlin	650 (748)	404	-246 (-344)	1,847	35% (41%)
Randalstown	650 (748)	560	-90 (-188)	2,077	31% (36%)
Ballynure	175 (201)	27	-148 (-174)	386	45% (52%)
Ballyrobert	80 (92)	82	2 (-10)	242	33% (38%)
Burnside	150 (173)	152	2 (-21)	483	31% (36%)
Doagh	200 (230)	278	78 (48)	613	33% (38%)
Dunadry	60 (69)	82	22 (13)	190	32% (36%)
Parkgate	60 (69)	12	-48 (-57)	261	23% (26%)
Straid	25 (29)	4	-21 (-25)	154	16% (19%)
Templepatrick	280 (322)	220	-60 (-102)	629	45% (52%)
Toome	120 (138)	362	242 (224)	265	45% (52%)
Hamlets	300 (345)	274	-26 (-71)	7,690	13%
Countryside	750 (863)	250	-500 (-613)		
Total	13,000 (14,960)	14,153	1,153 (-799)	56,370	23% (26.5%)

The net result is an increase by 15% on the Growth Allocation given to each settlement (column 1). This in turn results in a change in the Balance of Allocation and Supply column (column 4). Finally, as each settlement is receiving a 15% greater allocation, the Growth Rates in column 5 are increased marginally to account for the increase Growth Allocation.

Meeting the Growth Allocation within Antrim

The updated Housing Growth figure for Antrim has increased by 525 dwellings to an allocation of 4025 for the plan period 2015 – 2030. As previously set out, this additional

allocation is necessary due to the strategic location of the town and proximity to the main M2 transport corridor and its direct links to Belfast. This increase in growth allocation has ultimately resulted in a need for more land within Antrim as the current land supply can only accommodate 3509 dwellings which is a shortfall of 516 dwellings of the predicted growth within the next plan period.

Potential Site for Inclusion within Antrim

Our client owns 16.6 acres of lands which adjoin the current settlement limit at the south east of Antrim (refer to map attached to this submission).



Subject lands located at Muckamore House, Antrim

These lands are particularly suited to accommodate expansion of the current settlement limit for the following reasons:

- The site directly adjoins the existing settlement limit of Antrim and appears to be an obvious area for 'rounding off' the current development limit
- The Manor house on site has been converted to 11 no. apartments, with the Coachman's Courtyard converted into 7 no. apartments; housing developments are also located to the North East and North West boundaries of the site.
- There are no environmental designations impacting the site and the two sites of archaeological interest on site can be protected through regional planning policy.
- The site is in close proximity to key transport routes to Belfast such as the M2 motorway and Seven Mile Straight (B39).
- The site is located 1.4 miles from Antrim Railway station with a direct public transport route into Belfast.

It is clear from the points set out above that the attached lands are appropriately located to accommodate residential development that will help to meet projected housing growth

requirements for Antrim. The inclusion of the site within the development settlement limit will ensure Antrim retains its compact urban form and we would request that the Council consider this proposal during the forthcoming stages of Local Development Plan preparation.

We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as the LDP progresses.

Yours Sincerely



Helena McDonnell
Strategic Planning

