

Submitted to Local Development Plan 2030 - Draft Plan Strategy Representations  
Submitted on 2019-09-20 16:35:57

## 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:

David

Last name:

Mitchell

Job Title (where relevant):

Director

Organisation Name (where relevant):

D R Mitchell Ltd.

Agent Name (If applicable):

D R Mitchell Ltd.

Client Name (If applicable):

D R Mitchell Ltd.

Address:

18 Albert Road

Postcode (please enter your full postcode):

BT38 8AB

Telephone number:

+442893367578

What is your email address?

Email:

david@drmittchelltd.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 'Unsound'

### Unsound Representation

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

**Paragraph Number in Document:**

17.3

**Policy Heading:**

Homes in settlements

**Strategic Policy (SP) Paragraph Number:**

DM 17

**Detailed Management Policy (DM) Paragraph Number:**

DM 17.3

**Page Number In Document:**

143

**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?,

CE3 - Are there clear mechanisms for implementation and monitoring?, 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:**

During 2015 and 2016 an Assembly commissioned study of Developer Social Housing Contribution was conducted by Three Dragons Consultants, Milton Keynes, England.

The conclusion was that, with a few localised exceptions, the private development sector could not gift or make a Social Housing Contribution.

A policy implementing lower yield housing within developments would necessary have to re-examine the same factors as were extensively examined three years ago, if it was to be soundly based.

**Upload File:**

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:**

Clear statements, based on a sound industry examination, would be necessary, demonstrating the cost implications of the policy and how that cost would be borne without being detrimental to housing supply in the private sector.

**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?**

No