



Local Development Plan 2030

Draft Plan Strategy

Counter Representation Form

Public Consultation for Counter Representations

In accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, all representations received during the public consultation on the Antrim and Newtownabbey Local Development Plan 2030 - draft Plan Strategy, which ran from 26 July to 20 September 2019, have now been made available for inspection.

Hard copies of the representations received are available for inspection Monday to Friday from 8:30am – 5pm at the Council Offices at Antrim Civic Centre, Antrim and Mossley Mill, Newtownabbey. They can also be viewed online at www.antrimandnewtownabbey.gov.uk/draftplanstrategy.

In accordance with Regulation 18 of the aforementioned Regulations, any person may make representations about a site specific policy representation (referred to as counter representations).

The period of public consultation for counter representations is 8 weeks beginning on Friday 11 October 2019 and closing at 5pm on Friday 6 December 2019. Any submissions received after this time will not be considered.

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. 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.

As the main purpose of the IE is to determine whether the draft Plan Strategy is 'sound', any person(s) wishing to make a counter representation should do so on the grounds of soundness.

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



Procedural Tests	
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?
Consistency Tests	
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?
Coherence and Effectiveness Tests	
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.
*Development Plan Document (DPD) – Comprises of the draft Plan Strategy	

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>.



What is a Counter Representation?

A counter representation provides an opportunity for interested parties to respond to 'site specific policy representations' received to the draft Plan Strategy and to respond if they so wish.

A 'site specific policy' means a policy in the draft Plan Strategy which identifies a site for a particular use or development.

A 'site specific policy representation' means any representation which is seeking to change the draft Plan Strategy by:

- (a) adding a site specific policy to the draft Plan Strategy; or
- (b) altering or deleting any site specific policy in the draft Plan Strategy.

A counter representation should therefore be specifically related to and identify the relevant draft Plan Strategy 'site specific representation' and indicate the reasons for doing so in terms of the soundness and sustainability of the draft Plan Strategy.

A counter representation is **not** an opportunity to raise new issues regarding the draft Plan Strategy, rather it allows interested parties to consider and respond to potential changes proposed by representations previously submitted during the public consultation on the draft Plan Strategy which ran from 26 July to 20 September 2019. As a consequence, a counter representation must relate to a previously submitted site specific policy representation and must not propose any further changes to the draft Plan Strategy. A counter representation should indicate the reasons for doing so in terms of soundness and sustainability of the draft Plan Strategy.

Further information on counter representations, including site specific policy representations, can be found in the Department for Infrastructure's published [Development Plan Practice Note 9 'Submission and Handling of Representations'](#).

How to Make a Counter Representation

Counter representations will be treated as a formal representation and considered at the Independent Examination (IE). The focus at the IE will be on the soundness of the draft Plan Strategy, and counter representations should therefore be based on soundness.

You must clearly state the reference number of the representation to which your counter representation relates so that we, and the Independent Examiner, can ensure that your counter representation is considered as fully as possible.

Counter representations should be made in writing and we would encourage you to use the methods set out below:-

Online

- Via our online consultation hub at:
www.antrimandnewtownabbey.gov.uk/consultations



- Downloading a copy of the response form from our website and forwarding it to the Forward Planning Team; or
- Requesting a copy of our response form to be posted to you or you may collect a hard copy from Mossley Mill or Antrim Civic Centre and return it to the Forward Planning Team.

By Mail

- Email us at planning@antrimandnewtownabbey.gov.uk
- In writing at the following postal address

Forward Planning Team
Mossley Mill
Carnmoney Road North
Newtownabbey
BT36 5QA

Counter representations must be received by 5pm on Friday 6 December 2019. Any submissions received after this time will not be considered.

Points to Remember:

- You must clearly state the reference number of the representation to which your counter representation relates so that we, and the Independent Examiner, can ensure that your counter representation is considered as fully as possible;
- If you wish to submit several counter representations relating to several separate representations, we would encourage you to fill out separate forms, in order to keep your comments clear and concise;
- Counter representations should only be related to site specific representations that were made in response to the draft Plan Strategy;
- Site specific representations are those that seek change to the draft Plan Strategy by adding a site specific policy, or altering or deleting any site specific policy;
- Counter representations must not propose any changes to the draft Plan Strategy;
- There will be no further opportunity to submit information once the public consultation period closes unless the Commissioner requests it.
- Counter representations should be supported, succinctly, by all the evidence thought necessary to justify the proposed change; and
- Counter representations will be made publicly available for inspection after the 8 week formal public consultation period at the Council offices and on the Councils website.



Next Steps

Counter representations received during the statutory 8 week consultation period will in due course be published online and made available for inspection at Mossley Mill and Antrim Civic Centre.

Representations and Counter Representations will be submitted to the Department for Infrastructure in due course, where they will be considered as part of the Independent Examination process. All published data will comply with our Local Development Plan Privacy Notice, which is available on our Council website at:
www.antrimandnewtownabbey.gov.uk/gdpr/planning-gdpr.

Contact Us

For further assistance, please contact the Forward Planning Team :

By Post – Forward Planning Team

Mossley Mill

Carnmoney Road North, Newtownabbey

BT36 5QA

By Email – 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/.

Please note that when you make a 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 and the Independent Examiner(s) 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

Phone - 028 9446 3113



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)
Title		
First Name		
Last Name		
Job Title (where relevant)		Senior Inspector of Historic Monuments
Organisation (where relevant)		Historic Environment Division
Client Name (where relevant)		
Address		Department of Communities Historic Environment Division Ground floor 9 Lanyon Place BELFAST
Post Code		BT1 3LP
Telephone Number		
Email Address		



SECTION C – COUNTER 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. Have you submitted a representation to the Council regarding the draft Plan Strategy?

Yes ☒

No ☐

4. If yes, please provide your reference number and a summary of the main issue(s) raised in your representation below.

LA03/DPS/0032

Representation from Historic Environment Division; consider the Draft Plan Strategy to be generally sound with recommendations made towards making it "more sound".

(Continue on a separate sheet if necessary)



Any person can make a counter representation in relation to a site specific representation. The purpose of a counter representation is to provide an opportunity to respond to proposed changes to the draft Plan Strategy as a result of representations submitted under the Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

5. Please provide the reference number of the representation to which your counter representation relates to:

(if you wish to submit several counter representations relating to several separate representations we would encourage you to fill out separate forms, in order to keep your comments clear and concise.)

LA03/DPS/0110

6. Please give reasons for your counter representation. You are advised that your counter representation should be based on the soundness test(s) identified in the above-referenced representation and the sustainability of the draft Plan Strategy.



Please note: Your counter representation must not propose any new changes of the draft Plan Strategy. 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. This representation will be considered during the

HED advise that the archaeological report (Appendix 10) which accompanies this representation is an insufficient assessment of historic environment matters in relation to the proposed zoning of land put forward. This report focuses primarily on historic environment datasets and does not sufficiently consider the historic landscape characteristics or context of the area proposed for zoning. Most concerningly the report contains inaccuracies and articulates that there are no surface expressions of any of the features recorded on the HED datasets.

Section 2.1 states "... WWII defence heritage sites were also identified within the red line boundary, both of which are recorded as DHP 0.00. One of these sites is recorded as an ammunition bunker and the other as a heavy anti-battery platform. No evidence of these sites is now visible in the landscape".

Section 2.2. states "two WWII, defence heritage sites are recorded within the development area, no evidence of either of these is now visible within the red line area".

Section 4. Conclusion states "A site inspection revealed no surface expression of these or any other cultural heritage assets....",

These statements are untrue in that one of the defence heritage sites, the ammunition bunker, recorded on the Defence Heritage Record, survives in an almost completely intact condition and is clearly visible from the immediately adjacent Hydebank Road, see attached image dated 21/10/2019. The HED locational point for this feature is located directly on the building, which is also mapped by OSNI and is visible on the most recent OSNI aerial photography of the site. We further advise that it would be prudent to consult twentieth century Ordnance Survey editions. Defence Heritage features derived from WW2 are often mapped on 1:2500 editions from the 1960s onward.

The report does not consider the placename evidence or sufficiently describe the landscape characteristics discernible in the proposed zoning. These provide important context to assessment of the historic environment and cultural heritage. (e.g Grange of Mallusk – highlights that these were church lands in the medieval period.)

Aside from the HED datasets the report makes some reference to the historic ordnance survey maps, but focuses on buildings. There is no discussion of historic landscape characteristics such as the waterways which traverse part of the proposed zone and the potential that may stem from these for associated archaeological sites – A brief look at aerial imagery indicates that one of these have had its course altered prior to the drawing of the first edition Ordnance Survey maps. The boundaries and routeways depicted on these early maps should also be considered, as should the historic townland boundary which is in itself as historic environment attribute. **(cont'd over)**



Independent Examination and there will be no further opportunity to submit information unless the Commissioner requests it.

HED advise the importance of being in a position to highlight how historic environment evidence has been used at local policies stage to inform defining areas for future development and forms of mitigation such as zoning or key site requirements.

HED advise that this report would **not** provide a sound evidence base for zoning of lands and we consider **fails the soundness** test CE2.

(Continue on a separate sheet if necessary)

Signature:

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Date:

02 December 2019



Thank you for your response.



