

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.

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:

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>.

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, 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

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 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

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)
Title		Mr
First Name		Eamonn
Last Name		Loughrey
Job Title (where relevant)		
Organisation (where relevant)	Tamar Selby	Inaltus Limited
Client Name (where relevant)	C/O Agent	
Address		15 Cleaver Park Belfast
Post Code		BT9 5HX
Telephone Number		07772947761
Email Address		eamonn@inaltus.com

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: _____

ii) Policy Heading: _____ Employment _____

➤ Strategic Policy (SP) Paragraph Number: _____ SP 2.2 _____

➤ Detailed Management Policy (DM) Paragraph Number:

_____ DM 1 _____

iii) Page Number in Document: _____ 76 & 88 _____

iv) Proposal Map (if relevant state location): _____

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.

Not Applicable

(Continue on a separate sheet if necessary)

6. If you consider the draft Plan Strategy to be '**UN SOUND**' 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 DPD¹ 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?
- ☒ **CE4** - Is it reasonably flexible to enable it to deal with changing circumstances?

Details

¹ Development Plan Document (DPD) – Comprises of the draft Plan Strategy

7. Please give details of why you consider the draft Plan Strategy to be '**UNSOUND**' 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 and here will be no further opportunity to submit information unless the Commissioner requests it.**

See Attached Response.

(Continue on a separate sheet if necessary)



Modifications

8. If you consider the draft Plan Strategy to be '**UNSOUND**', 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.

See Attached Response.

(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

Signature:

Eamonn Loughrey

Date:

20 September 2019

Thank you for your response.

Antrim and Newtownabbey Local Development Plan 2030

Response to the Preferred Options Paper

POP Ref: POP/PR/023

Ref: 16/11 (6) (PS)

Client: Tamar Selby

1. We make this submission on behalf of our clients Tamar Selby. Tamar Selby own lands located at Nutts Corner/Dundrod Road and have planning permission for industrial development of these lands (Ref: LA03/2017/0133/F). These lands are former NIE offices, now derelict and have previous planning permissions for industrial development including office use. They are surrounded by industrial and storage and distribution uses.
2. The extant Antrim Area Plan has been found to accept industrial use on the lands at Nutts Corner.
3. Our clients endorse the Council's Plan Strategy to identify Nutts Corner as a Strategic Employment Location (SEL). We have reviewed the Economic Growth Evidence Paper (EP) 3 and recognise that the Council have identified substantial evidence to demonstrate and support the inclusion of Nutts Corner as a SEL. Our clients principal concern is that the Draft Plan Strategy seeks to curtail the type of uses on the lands.
4. We enclose our POP submission, the details of which continue to support the inclusion of Nutts Corner as a SEL. This is at **Annex A**. We do not repeat the details of our POP submission here, however we do rely upon the comments made should it be necessary. The lands owned by Tamar Selby are also illustrated at **Annex A**.

Details

Please give details of why you consider the draft Plan Strategy to be '**UNSOUND**' 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 and here will be no further opportunity to submit information unless the Commissioner requests it.***

5. The Plan is unsound because:-
 - C3 The Plan Strategy does not take proper account of the SPPS in respect of the requirement for ample supply of economic development lands.
 - CE4 The Plan Strategy is not reasonably flexible to deal with changing circumstances. The Plan does not reflect the fact that Nutts Corner needs to have flexibility to attract a variety of businesses.
6. We consider the Plan Strategy Objectives are not ambitious enough. The SPPS (para 6.92) states *“A fundamental role for LDPs is to ensure that there is ample supply of suitable land available to meet economic development needs within the plan area”*. Strategic Objective 3 only allows for a ‘range’ and quality of land and premises to facilitate business growth. This does not reflect the SPPS requirement and the objective should be amended to properly reflect the SPPS policy requirements.
7. We endorse the Council’s Strategic Policy (SP) 2 insofar as it advocates provision of 9,000 new jobs by 2030. Our clients welcome the identification of Nutts Corner in SP2.2. However, again, the reference in SP2.2 to a “range” of sites, is not consistent with the SPPS requirement for an “ample” supply of lands.
8. Again our clients welcome the inclusion of Nutts Corner as a SEL in Table 3.
9. We note that policy DM 1 deals with Economic Development - Zoned Sites and Settlements, and that it states that *“Acceptable uses at the Nutts Corner SEL will be limited to industrial development, transport and logistics, and storage and distribution proposals”*. Our clients would object to this aspect of the policy. There is no justification to single out Nutts Corner and restrict its future users on this basis. It ignores the fact that parts of Nutts Corner including our client’s lands have office development use previously approved. Many industrial uses will have a requirement for office use as part of an investment

decision. The Council have set out no grounds why Nutts Corner should be prejudiced in this way.

10. Furthermore, we note that the Council's EP 3 on Economic Growth does not identify any significant lands within Crumlin for industrial use. The growth of Crumlin will be supported by the growth of Nutts Corner and it is important therefore that investors in Nutts Corner have the fullest flexibility when it comes to the type and scale of its economic investment proposals.
11. The last line of DM 1.1 should therefore be deleted.

Modifications

If you consider the draft Plan Strategy to be '**UNSOUND**', 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.

12. As set out above the following changes should be made to the Draft Plan Strategy:
13. The Strategic Objective 3 should be changed to encourage an "ample" supply of economic development lands.
14. Policy DM 1 should not distinguish Nutts Corner from other SELs that would undermine its opportunity to be successful. As such the last sentence of DM 1.1 should be deleted.

Other Matters

15. As part of **Annex A** we attach the site plan of our client's land and request that the Council include of these lands within the Strategic Employment Location at Nutts Corner.

Annex A

POP Submission including Site Map.

Antrim and Newtownabbey Local Development Plan 2030

Response to the Preferred Options Paper

Ref: 16/11 (6)

Client: Tamar Selby

1. We make this submission on behalf of our clients Tamar Selby. Tamar Selby own lands located at Nutts Corner/Dundrod Road and have a current application submitted to the Council for industrial lands (Ref: LA03/2017/0133/F). These lands are former NIE offices, now derelict and have previous planning permissions for industrial development. They are surrounded by industrial and storage and distribution uses.
2. The extant Antrim Area Plan has been found to accept industrial use on the lands at Nutts Corner.
3. Our clients endorse the Council's POP's options to identify Nutts Corner as a Strategic Employment Location.
4. The lands owned by Tamar Selby are illustrated at **Annex A** and we would request any designation of the Strategic Employment Location should include these lands.

Q.9. Do you agree with our Plan Vision and Objectives?

5. We consider the objectives are not ambitious enough. The SPPS requires a generous supply of economic development land.
6. The first, second sixth objectives should be changed as follows:
 - a. Provide a generous supply ~~adequate range~~ and quality of land ~~and premises [the Council will not provide any premises through the Plan]~~ for business and industry;
 - b. To protect strategically important business and employment areas ~~locations~~ to facilitate development of Strategic Employment Locations ~~opportunities~~

- c. ~~To ensure that necessary new infrastructure accompanies new development.~~
Maximising existing infrastructure and facilitating the delivery of new infrastructure.

Q.33. Strategic Employment Locations – Do you agree with our preferred option for strategic employment locations?

- 7. In respect of Nutts Corner being identified as a Strategic Employment Location we would agree with this approach. Nutts Corner is located on the Key Transport Corridor and in close proximity to Belfast International Airport and within close proximity of the M1/A1 giving fast and convenient access to Belfast and the south. Allocating Nutts Corner as a Strategic Employment Location is consistent with RDS 2035 Regional Guidance RG1, as well as being consistent with the SPPS objective of providing a generous supply of land suitable for economic development and a choice and range in terms of quality. The Nutts Corner location will also help to sustain a vibrant rural community in this part of the Council area.

Q.34. Are there any areas of land around Antrim, Ballyclare, Crumlin and Randalstown that could be identified as a potential strategic employment location?

- 8. We consider that Nutts Corner, in addition to any other lands specifically identified on the immediate edge of Crumlin, should be identified as a Strategic Employment Location. Having a choice of employment locations provides choice and a generous supply of land. As explained above this is a requirement of the RDS and SPPS, but also a requirement to ensure the Plan is sound, insofar as it has flexibility to cater for unforeseen circumstances during the Plan period (i.e. see Development Plan Practice Note 06 CE4 page 22).

Q.37. Countryside – Do you agree with our preferred option that Nutts Corner should be identified as a strategic employment location?

- 9. We **agree** with the Preferred Option to include Nutts Corner as a Strategic Employment Location.
- 10. Nutts Corner has the key attributes for a successful Strategic Employment Location. It:-

- a. is of a significant scale to accommodate a variety of large business,
- b. is relatively free from constraints such as sensitive neighbours (e.g. large residential areas);
- c. has a relative flat topography making construction practical and less costly;
- d. is midway between the M1 and M2 motorways;
- e. has good transport connections being located close to the International Airport, and at the intersection of a number of main highway routes;
- f. is in close proximity to Belfast, Lisburn and Antrim;
- g. has a range of established businesses;
- h. is a brownfield site that needs regeneration and as such is unattractive in the countryside, and its redevelopment will enhance the area;
- i. has a growing local population at Crumlin that can support the employment needs of future employers

Q.38. What types of employment use would be suitable on the site?

11. A Strategic Employment Location of the scale of Nutts Corner, should provide for a mixture of uses in both nature and scale. To be a successful development, large main employers will need to be supported by smaller supply companies that will seek to be located in close proximity to the client companies.
12. A broad mixture of industrial and warehouse uses would be required with ancillary office and service accommodation. Large companies that invest heavily in a factory may also seek to integrate a head office accommodation beside their main factory, and policy should be sufficiently flexible to allow this.
13. The size and scale of the area could become a hub for a major data centre. The area is large enough for the buildings along with any cooling and security requirements. However, there is a need to upgrade the electricity infrastructure to support it.
14. The area should also be considered as a designation for an Simplified Planning Zone, which would allow for relaxed planning rules to give new market entrants and investors' confidence that planning regulations will not be a barrier to entry or a delay that would compromise the potential investment or indeed expansion of a successful business.

Q.39. Spatial Growth Strategy – Do you agree with our proposed a spatial growth strategy?

15. We agree with the Spatial Growth Strategy bullet 4 and 5 in the need to:-
 - a. Sustain and maintain our countryside through the accommodation of suitable employment and housing in the rural area;
 - b. Promote sustainable development and strengthen the role of our gateways such as Belfast International Airport with the development of Strategic Employment Locations on our key transport routes.
16. Both objectives support the designation of Nutts Corner as a Strategic Employment Location, which we endorse.

Q.46. Are there any factors you consider we should address in our new employment policy?

17. In order for Strategic Employment Locations to be successful and come forward during the plan period, the Council's policy within these areas should be permissive and provide flexibly for future investors and employers.
18. As mentioned above an Simplified Planning Zone would offer flexibility without the need for specific planning permission is defined circumstances. The Council should produce a design brief or design schedule that would provide guidance for future developers that would allow any requirement for permission to be fast tracked. This would be the epitome of a plan-led system, where a proposal that complies with the plan and associated guidance would be approved in the minimum time possible.

Q.47. Are there any other issues in relation to employment and planning that you would like us to consider in our new Plan?

19. RDS para 3.2 states that *"Business depends on efficient connections for goods and services including the necessary infrastructure to service economic growth, such as robust electricity and telecoms connections"*.

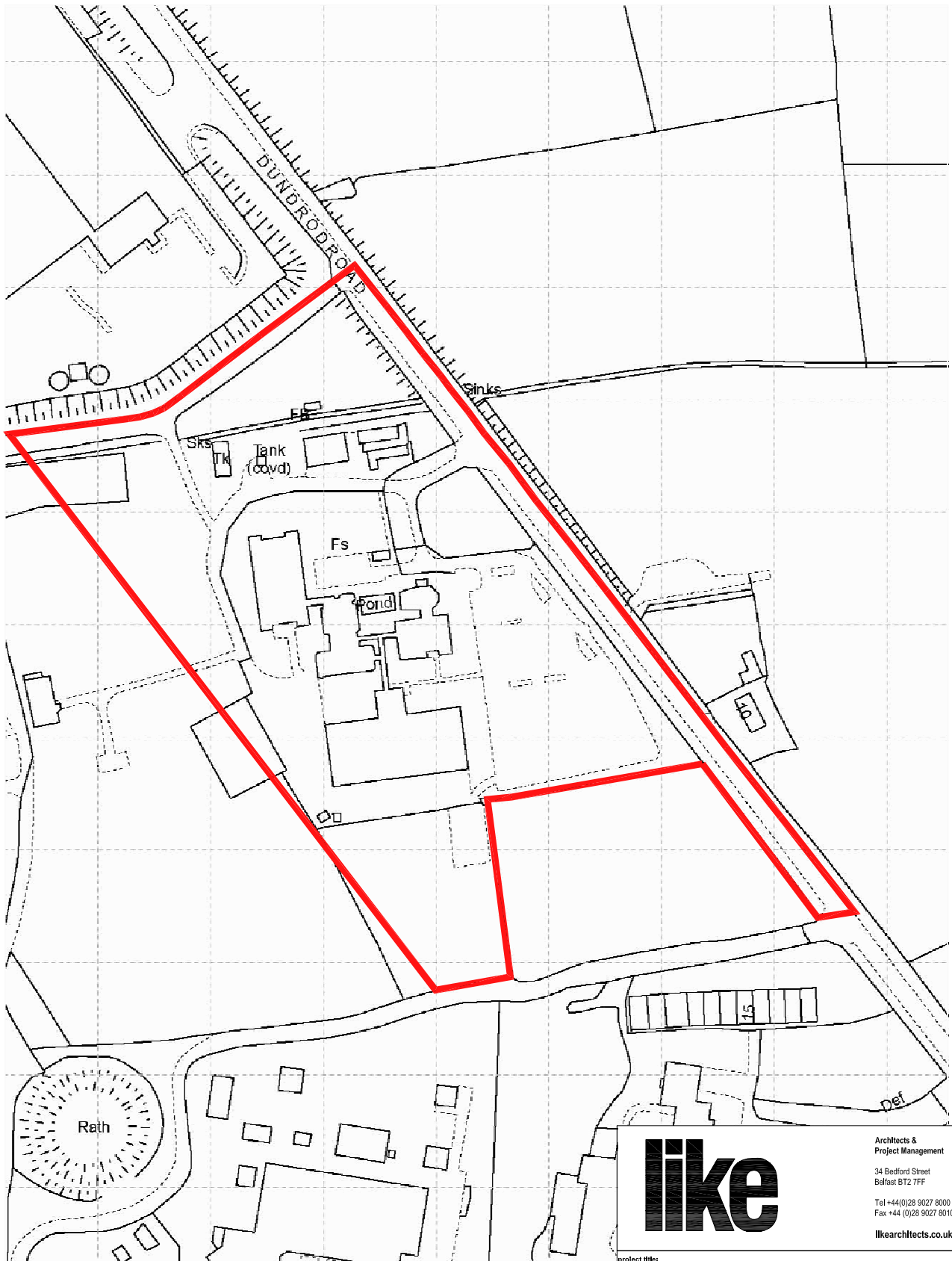
20. The Council should undertake to facilitate the development of Nutts Corner through the provisions of all the necessary infrastructure, such as a secure and stable electricity supply that would make this area Northern Ireland's premier industry and storage and distribution location. The Council should lobby Department for Infrastructure, Invest NI, the Strategic Investment Board, NIE, Water Service, Transport NI and telecommunication companies to ensure that the necessary infrastructure is brought to the Nutts Corner area to support the private sector investments being made there.
21. The Council should undertake to work proactively, taking the lead, with the support of key stakeholders, to deliver the Strategic Employment Location.

Other Matters

22. We attach the site plan of our client's land and request that the Council consider the inclusion of these lands within the Strategic Employment Location at Nutts Corner.

Annex

- A. Site Map



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project title:
INDUSTRIAL DEVELOPMENT AT DUNDROD ROAD, CRUMLIN

drawing title:
SITE LOCATION PLAN

drawn by: BJL	approved: MM	date: 03.08.16	scale: 1:2500 @ A4
cad source:		issue stage:	

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