
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	Steven	
Last Name	Brown	
Job Title (where relevant)	Plant Engineering Team	
Organisation (where relevant)	Bombardier Aerospace	
Client Name (where relevant)		
Address	Airport Road, Belfast	
Post Code	BT3 9EU	
Telephone Number	028 9045 8444	
Email Address	stephen.t.brown@aero.bombardier.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: 'DM1 Economic Development – Zoned Sites & Settlements'

➤ Strategic Policy (SP) Paragraph Number:

➤ Detailed Management Policy (DM) Paragraph Number: DM

1.2_____

iii) Page Number in Document: __89_____

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

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

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

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

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



Details

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 Schedule A attached



(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 Schedule A attached



(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:

Stephen Brown (on behalf of Bombardier Aerospace)

Date:

20/09/2019

Thank you for your response.



Schedule A

Representation to Antrim & Newtownabbey BC Local Development Plan Draft Plan Strategy on behalf of Bombardier Aerospace

1.0 Introduction

Bombardier Aerospace considers the Draft Plan Strategy to be '**unsound**' and fails 'Soundness Test' **CE2** (*Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?*) and **CE4** (*Is it reasonably flexible to enable it to deal with changing circumstances?*).

Bombardier Aerospace are one of the largest employers within the A&N BC area and own land at Church Road, Newtownabbey and Monkstown Industrial Estate, Newtownabbey. The Church Road lands were previously subject of planning application U/2014/0339/O for a retail-led mixed use development. Bombardier's lands at Church Road are the focus of this representation.

The aerial photograph below identifies the following designations and features that are referenced in this representation –

- Extent of lands owned by Bombardier Aerospace and that were subject to planning application U/2014/0339/O (Red line)
- Extent of 'Land Zoned as Existing Employment' in draft Belfast Metropolitan Area Plan (Pink line and pink shade)
- Boundary of approved planning application LA03/2017/0925/O (hotel and office) that broadly correlates with the remaining available employment zoned land assessed by the ELER. (Blue line identifies planning application boundary; Pink line and pink shade within this area identifies extent of remaining zoned land)



Fig. 1 Aerial Photograph with draft BMAP Zoning & Planning Application Boundaries

2.0 LDP Draft Plan Strategy (DPS)

As a major employer in the Borough and a supporter of a significant local supply chain in the aerospace industry, Bombardier welcomes the DPS's aspiration *"to facilitate the growth of up to 9,000 new jobs by 2030 and will operate a presumption in favour of employment-related development."* (pg 76 para. 2.1)

To help meet this target, A&N BC has identified existing strategically located industrial/employment sites (generally of 10 hectares or greater in size) as Strategic Employment Locations (SEL). Amongst the 6 no. sites identified within Metropolitan Newtownabbey as SELs are 'Church Road' and 'Monkstown Industrial Estate'.

We note that the Evidence Base used to inform the DPS includes an 'Employment Land Evaluation Report (ELER)' by Gravis Planning. Paragraph 5.13 of the DPS states that the ELER *"has provided a robust analysis of our Borough's employment land portfolio and supports the identification of a range of existing Strategic Employment Locations (SEL) focused on the larger settlements (Metropolitan Newtownabbey, Antrim and Ballyclare), as well as at Belfast International Airport and the strategically located Nutts Corner site."*

In relation to SELs, 'Policy DM1: Economic Development – Zoned Sites & Settlements' states,

***Large scale** industrial development, business uses, call centres, research and development facilities, logistics and storage and distribution proposals will be directed towards Strategic Employment Locations (SELs). Acceptable uses at the Nutts Corner SEL will be limited to industrial development, transport and logistics, and storage and distribution proposals. (emphasis added)*

The Council will protect these strategic sites and resist proposals for alternative uses except where the development is ancillary to an existing use of the site or comprises a suitable sui generis employment use that will not lead to a significant diminution of the role of the SEL. (Pg 88-89; para. DM 1.1 – 1.2)

In relation to this Policy we note the following paragraphs, under *"Why we have this Policy"*,

"The aim of this policy is to promote core economic development schemes on zoned employment sites and to facilitate sustainable employment opportunities elsewhere in settlements that are appropriate to their location.

This aim has taken account of and is consistent with the provisions of the SPPS.

The Council wishes to ensure that an ample supply of employment land is available and retained for economic development purposes at a wide range of suitable sites focussed on our Borough's settlements to meet the future demands of the industrial, advanced manufacturing, and transport and logistics sectors, and to assist in attracting new high tech digital enterprises and businesses within other key growth sectors.

Focussing economic development within our Borough's settlements and on well-located zoned land, suited to such purposes, will capitalise on the development opportunities provided by the concentration of people and goods, combined with available infrastructure and the clustering of a range of business and professional services essential to economic development." (Paras 5.26-5.28)

3.0 Employment Land Evaluation Report (ELER)

As referenced above 'Evidence Paper 3: Economic Growth' contains a ELER compiled by Gravis Planning on behalf of Antrim & Newtownabbey BC (A&N BC). Within the ELER are Assessments of 'Brownfield Land' and 'Employment Land'. Due to its existing use and

designation in draft BMAP, the Church Road lands are considered in the 'Assessment of Employment Land'.

The Assessment is a 2 no. stage process –

Step 1 – Identify quantum of zoned employment land still available for development in the extant and draft area plans;

*Step 2 – Qualitative assessment of **remaining available zoned land** to inform whether zoned land should remain so or be de-zoned/re-zoned for alternative uses. (emphasis added)*

At Step 1, Gravis Planning undertook a site visit to establish whether the sites are fully occupied or have further capacity for development (para. 7.3). At Step 2 *"the remaining available zoned employment land"* ie undeveloped land only, was subject to a qualitative assessment. This Assessment considered the suitability (or otherwise) of the remaining zoned employment lands to continue to be zoned for such development (para. 7.4). As such, the Assessment did not consider the suitability of the existing zoned lands that are already developed including those under the ownership of Bombardier Aerospace. This was confirmed by A&N BC Forward Planning Team on 17/09/2019. Fig. 2 below illustrates the extent of the land considered as remaining zoned lands to the west of Church Road.



Fig. 2 Lands bounded blue identify lands that were subject to assessment in the ELER.

Each of the sites identified at Step 1 were then assessed against the same Scoring Matrix, with a total score informing a ranking of each site to reflect its suitability (or otherwise) for accommodating employment development.

The ELER states that,

*"It was determined that a threshold should be set that any zoned employment land would have to score below before being considered for de-zoning. **The rationale for setting a threshold is based on these lands having already gone through a development plan process and having previously been scrutinised, were found to be suitable for employment development.**"*

Therefore, unless there have been significant on-site changes, there is a presumption that such lands remain suitable for employment use.

It was decided that only lands that score less than 60% (29) in the qualitative assessment should be considered for de-zoning. This above average score reflects the need for significant on-site changes to existing zoned sites before they can be considered for de-zoning. Such an approach aligns with regional policy as per the SPPS and RDS that requires an ample supply of economic development land. (emphasis added)

ELER Appendix F contains the 'Final Scores and Rankings for Zoned Employment Lands'. The remaining zoned lands at Church Road score well in relation to their suitability for future employment related uses. The site scores 42 out of 48 and is ranked 3rd equal of the 19 sites assessed in Metropolitan Newtownabbey.

4.0 Comment on Soundness

As stated in the Introduction, Bombardier Aerospace contend that test of soundness 'CE2' has not been met and the allocation of the lands at Church Road as a Strategic Employment Location is neither appropriate or founded on a robust evidence base. To justify this assertion, we note the following –

1. The Employment Land Evaluation Report by Gravis Planning is dated March 2019 and should therefore contain up-to-date information. In relation to the planning history at Church Road, the ELER refers to planning applications LA03/2017/0925/O (hotel and office) and U/2014/0339/O (retail-led mixed use development) as 'pending'. The former was granted permission on 22nd January 2019 and the latter withdrawn by Bombardier Aerospace on 10th March 2017. Given the timescales, Gravis and A&N BC Forward Planning Team should have been aware that the mixed use development proposed by Bombardier Aerospace was no longer a live planning application the site has been lying vacant for a number of years and the remaining 'available' land is subject to a live planning permission for a hotel and office development.
2. The planning history also omits reference to planning application U/2008/0619/F on the remaining 'available' land that granted permission for the *'Reconfiguration of a permission for the erection of a business and technology park incorporating classes B1, B2 and B4 of the planning (Use Classes) Order (NI) 2004'* in May 2012. We note from the Development Management Officer Report associated with planning application LA03/2017/0925/O that the previous permission may have been implemented by the applicant but that a Certificate for Lawful Development had not been issued to formally certify it.
3. In the Scoring Matrix (Appendix C), Church Road is identified as site no. 11. A&N BC advised on 17/09/2019 that no further details on the scoring of the site exists. We note that the site benefits from a number of full marks (3 out of 3) against each of the scoring criteria and that the 'Scoring Matrix Rationale' is provided at Appendix C but we question whether Gravis Planning has fully considered the following points in awarding maximum marks of 3 points against the criteria listed on the Scoring Matrix Rationale (Appendix C page 131/136), namely -
 - The proximity of the site to 'Industrial Heritage Records' at the adjacent underground reservoir and Glas na Braden River (Scoring Matrix Rationale 'built heritage features');
 - Topography across the site and what appears to be a significant slope down from north to south (Scoring Matrix Rationale 'topography');
 - The proximity of residential properties to the south west and east of the site at West Crescent (Scoring Matrix Rationale 'neighbouring land uses');

- The proximity of the site to public open space to the south and west (Scoring Matrix Rationale 'neighbouring land uses');
 - Planning application LA03/2017/0925/O that granted planning permission for a 'Hotel and Office' at the subject lands in January 2019. Although a 'sui generis' use, the approved hotel establishes a residential / leisure type use within the site and this may constrain future industrial development in the adjoining plots(Scoring Matrix Rationale 'planning history').
4. The Assessment undertaken by Gravis Planning only considered the remaining available zoned lands *based on these lands having already gone through a development plan process and having previously been scrutinised, were found to be suitable for employment development* (ELER pg 89 para. 7.8). We question the robustness of this approach and suggest the wider Church Road lands in their entirety should have been subject to assessment of suitability for retention of the existing zoning.

In relation to the Bombardier lands to the west of Church Road, the planning application of November 2014 set out the significant limitations of the existing site stating that *'The obsolete nature of the buildings, the landlocked nature of the site and the character of the surrounding area means that the site no longer meets the needs of manufacturing and industrial sectors, and there is consequently no demand for the site from this sector'*.

This position was endorsed by Commercial Property Agents and Invest NI during the informal PAD Process. It is notable that the site has been being marketed for ??? years and the southern portion of the site has been vacant since 2013. The site conditions and significant constraints directly contributed to Bombardier Aerospace concentrating their operations at Monkstown Industrial Estate, Belfast Harbour, Dunmurry and Newtownards in preference to the Church Rd site.

To the east of Church Road, we note that the Valley Business Centre provides office, studio and warehousing space for small to medium sized businesses and currently contains a range of small business, retail and service related uses including 'Nuff Tees' printers; 'HSL Newtownabbey' furniture shop and 'Ultra Pro' oven cleaners. The subdivision of the buildings at Valley Business Park and the scale of some of the businesses that operate from it are those that might be expected to locate in a site to be protected as strategically important.

In this context, the existing Employment Land at Church Road and in particular the lands owned by Bombardier Aerospace should not be identified as a 'Strategic Employment Land' site as its suitability is challenged and it has not been subject to assessment.

Bombardier Aerospace considers the Draft Plan Strategy to be 'unsound' and fails 'Soundness Test' CE2 as the strategy, policies and allocations are not appropriate as they are not founded on a robust evidence base. The Plan Strategy also fails to meet Test 'CE4' as the identification of SEL at Church Road and the associated planning policy does not provide flexibility to enable the Strategy to deal with changing circumstances, some of which have already been highlighted as live issues affecting the lands identified within the Church Road SEL. .

5.0 Proposed Modifications

Bombardier Aerospace has no objection to the principle of 'Policy DM1: Economic Development – Zoned Sites & Settlements' and its overarching objective to protect strategic sites zoned for employment uses.

However, we suggest that due to environmental constraints and the changing character of the surrounding area, the lands at Church Road do not function as a 'Strategic Employment Land' site and should therefore be omitted from the Draft Plan Strategy for the reasons outlined above.

Finally, we contend that the Local Policies Plan is the more appropriate mechanism to identify, designate and consult on the proposed site specific SELs. The 'Local Development Plan 2030 Revised Timetable July 2018' indicates that the Local Policies Plan is not scheduled for adoption until early 2024. Should the Draft Plan Strategy be adopted in its current form, Bombardier's lands and the wider Church Road lands would be designated as an SEL and would therefore be subject to more restrictive planning policy which would be in effect be site specific. This would be in advance of the detailed consideration and consultation required as part of the Local Policies Plan which is intended to be the appropriate mechanism for site specific policies and zonings.