

Submitted to **Local Development Plan 2030 - Draft Plan Strategy Counter Representations**
Submitted on **2019-12-06 15:49:15**

What is a Counter Representation?

How to Make a Counter Representation

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:

Agent

Please specify your contact details:

Title:

Mr

First Name:

Nigel

Last Name:

Whitehead

Job Title (where relevant):

Planning Director

Organisation Name (where relevant):

Agent Name (If applicable):

wpb

Client Name (If applicable):

CHL

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Telephone Number:

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What is your email address?

Email :

mail@wpb-bath.co.uk

Section C - Counter Representations

Your comments should be set out in full. This will help the Independent Examiner(s) understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner(s) invites you to do so.

Have you submitted a representation to the Council regarding the draft Plan Strategy?

Yes

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

Reference Number (It should start with LA03/DPS/):

LA03/DPS/0120

Summary of the main issue(s):

Crumlin

Nutts Corner

Strategic Policy 4

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

Reference No. of Representation (It should start with LA03/DPS/):

See attached submission

Please give a reason(s) 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 outline your reason(s) here::

See attached submission/by email

Do you wish to submit another counter representation?

No

**Local Development Plan 2030
Public Inspection of Draft Plan Strategy Representations
A&NB Council (11.10.19 - 06.12.19)**

COUNTER REPRESENTATIONS



**ON BEHALF OF CHL
LA03/DPS/0120**

Prepared by:

WPB Ltd

Ref: Counter Representation (Reg 18)
Date: December 2019

Ref: CR/CHL

In connection with written representations received on the Antrim & Newtonabbey Borough
Council Local Development Plan (Draft Plan Strategy, September 2019).

**Land at Glenavy Road, Crumlin
BT29 4LA (SP1/2/4/5)**

06/12/2019

LPA Ref: LA03-DPS-0120
Our Ref: documents/dec2019CRUMLINLDPA&NBC
CR on behalf of CHL.docX

Submission Date: 6 December 2019

1. INTRODUCTION

These counter representations respond to potential changes proposed by site specific representations submitted during the recent public consultation on the draft Plan Strategy (DPS).

These counter representations are presented on behalf of landowners at Crumlin (CHL) to accord with the published consultation deadline. They highlight key themes in site specific representations regarding the settlement of Crumlin and the outlying Nutts Corner SEP which may need to be taken into account at the next stages of plan making. They do not propose further changes to the draft Plan Strategy.

2. GENERAL

In accordance with Regulation 18 of the Planning Regulations the main objective of these counter representations is to comment upon site specific representations received by A&NBC to date on the DPS.

Crumlin

The following site-specific representations have been made on the draft Plan Strategy relating to the settlement of Crumlin :-

LA03/DPS/0033	Brian McBride
LA03/DPS/0035	Ulster University
LA03/DPS/0039	Corbo Properties
LA03/DPS/0040	Joyce & Hazel Bill
LA03/DPS/0041	Eastwood Estate Agents
LA03/DPS/0044	Bill Porter
LA03/DPS/0067	Loftus Homes
LA03/DPS/0078	Racarbry Development Ltd
LA03/DPS/0107	NI Electricity Networks
LA03/DPS/0120	CHL

The identified representations focus upon;-

- § Support for the consolidation of the role of the towns of Randlestown and Crumlin as '*local service centres*' for housing, employment, services and facilities.
- § Support for the DPS commitment to maintaining the role of Crumlin through the provision of suitable housing and employment opportunities is also acknowledged but growth allocations are considered to be presently too low to support or confirm soundness with the RDS.
- § Based upon the relevant tests of 'soundness' further specific justification and the use of an up to date evidence base is suggested by many respondents. In this way the published strategy and a number of proposed changes could make the DPD more sound. This is particularly the case in regard to the '*Coherence and Effectiveness Tests CE2 (the strategy, policies and allocations are*

realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base)'.

- § Proposed alterations to the site specific growth allocation in Strategic Policy 4 in the draft Plan Strategy are recommended to ensure that the test of soundness is met. If the DPD were to be altered to reflect the representations made it is suggested that this would set out a coherent strategy to be set out from which its policies and allocations logically flow. CHL support this position and emphasise that recommended action is imperative in Crumlin to ensure that key growth opportunities are not artificially suppressed.
- § The requirement for a more robust evidence base for existing housing and employment allocations are recommended based on the consideration of alternatives (including POP Option 3) and site-specific recommendations for increased levels of housing in the settlement of Crumlin during the plan period to 2030. Representations also consistently highlight the housing supply evidence base of the Plan should be reviewed to ensure that it represents a robust level of deliverability such that the potential need for any additional land for housing can be identified.
- § As mentioned the majority of respondents commenting specifically on housing numbers at Crumlin have emphasised that the Borough's overall housing allocation should be increased, potentially to the 13,000 set out in the POP. Submissions are consistent in their recommendations that this would also enhance the ability of the Plan to be flexible to deal with changing circumstances (Soundness Test CE4)
- § Many of respondents commenting specifically on housing numbers at Crumlin have emphasised that an adjustment to increase housing numbers to suggested housing levels is not only based upon Crumlin's potential for future sustainable growth but also based upon consideration of opportunities for the accommodation of additional housing without significant environmental degradation. CHL have already supported this position subject to additional environmental capacity studies.
- § Whilst many of the above respondents acknowledge the stated Vision of the local planning authority they consider that the LDP does not follow the strategy for strategic growth set out in the Regional Development Strategy. Criticism is specifically targeted at the supporting evidence and assumptions underlying Strategic Policy 4 and its associated growth allocations to individual settlements across the Borough.

- § Respondents commenting upon Crumlin have without exception confirmed the proposed housing levels to 2035 do not appear as a coherent strategy of policies and allocations that logically flow from a robust evidence base (*Coherence and Effectiveness Test CE1*).
- § In accordance with related guidance CHL endorse duly made representations that suggest Crumlin should be allowed to fulfill its role in maintaining a strong network of service centres sustaining rural communities in the local area. CHL also acknowledge respondents on Crumlin that have highlighted that suggested modifications to enable higher levels of residential and employment growth would be in accordance with the vision and guiding principles set out in the Regional Development Strategy.

Nutts Corner

Given its location CHL have closely monitored respondents on the allocation of rural Strategic Employment Location (SEL) at Nutts Corner on the edge of Crumlin. The following site-specific representations have been made on the draft Plan Strategy relating to the proposed SEL allocation at Nutts Corner (& Largy Road):-

LA03/DPS/0004	Lindsay Martin
LA03/DPS/0005	Richard Martin
LA03/DPS/0019	Mid Ulster District Council
LA03/DPS/0023	Antrim Agri Fertilisers
LA03/DPS/0043	Tamar Selby
LA03/DPS/0050	Lindsay Martin
LA03/DPS/0053	Heron Bros
LA03/DPS/0056	The Transport Training Board
LA03/DPS/0075	Nutts Corner Enterprise Park
LA03/DPS/0085	Moy Park
LA03/DPS/0095	Micheal Erwin
LA03/DPS/0096	Lisburn & Castlereigh City Council
LA03/DPS/0100	Nigel Herdman
LA03/DPS/0106/7	NI Electricity Networks
LA03/DPS/0108	Invest NI
LA03/DPS/0120	CHL

The identified representations represent one of the key topics of concern in the No.122 duly made representations and focus upon;-

- § A general consensus of support for the allocation of rural Strategic Employment Location (SEL) at Nutts Corner on the edge of Crumlin (and Largy Road) although the Evidence Paper 3 does not include additional land identified in this brownfield location within the 156 hectares of zoned employment land available (156 hectares).
Support identification of Nutts Corner within rural hinterland of Crumlin as a key employment site to support the local population.
- § Support for Nutts Corner as a current brownfield employment site (undefined) for a number of major businesses (incl. storage and distribution and other employment uses) with key expansion opportunities. The identified representations highlight that there is clear potential to extend this 90 hectare development site with associated transportation and landscape enhancements. Given that this site is not formally allocated it would seem imperative that the site (and the corresponding policy area) is defined as a SEL to secure key strategic employment opportunities.
- § Suggestion of a requirement for a site specific policy to the draft Plan Strategy to define the specific aims of this intended allocation.
- § Suggestion of a need to define a precise area based on Evidence paper 3 – Economic Growth, which highlights two possible areas for consideration.
- § Support for the proposed SEL at Nutts Corner is justified by the Council on the basis of existing planning history and development, infrastructure and recognition in previous policy documents. It is also identified as a key storage, distribution and industrial hub on the edge of Crumlin.

3. SETTLEMENT SPECIFIC COMMENTS

A number of respondents provide specific details of land available for future growth within the settlement of Crumlin (incl. LA03/DPS/0044, LA03/DPS/0120 & LA03/DPS/0078).

Representations suggest a range of additional dwelling allocations (150 – 300 houses to 2030 & 2035) should be provided within the plan period to maintain the role of Crumlin.

The details of land available for future growth contained in existing representations appears to indicate that suggested levels of housing growth based upon the expressed range could be accommodated in Crumlin to sustain the social, economic and environmental context of the settlement. One submission does however suggested an unproven scale of overall growth.

Based upon a review of need identified, in the Housing Needs Assessment/Housing Market Analysis the increased growth allocation could provide a level sufficient to allow for expected housing needs over the Plan period and to give a degree of flexibility over the choice of sites.

There is a general consensus amongst respondents on Crumlin that additional growth will serve to encourage sustainable economic growth including additional town centre shopping, community infrastructure commercial and entertainment/recreational uses. It is also highlighted by many respondents that strategic planning guidance emphasises the importance of the relationship between the location of housing, jobs, facilities, services and infrastructure. CHL suggest that based on duly made representations, the strengthening of Crumlin beyond the residential allocations found in the draft Plan Strategy would therefore be consistent with its strategic location on the key transport corridors, close to a strategic employment allocation (Nutts Corner), housing market and general connectivity with Belfast. In these circumstances it should receive appropriate recognition as a location addressing the three dimensions of sustainable development with a key identified role to play in terms of future growth.

Based upon the Council's own Evidence Paper 2 : Settlement Evaluation (June 2019) initial studies suggest that suggested levels of additional housing growth envisaged in Crumlin could also take place without causing unacceptable damage to the local character and environmental quality or residential amenity of the settlement. The *Strategic Settlement Analysis - Crumlin* mapping contained in Evidence Paper 2 shows 'No Obvious Development Constraint' to future outward growth on the settlement edge in all but the northerly direction. This would of course need to be proven by further site by site analysis given potential landscape and other environmental

considerations.

Based on existing housing commitments and emerging site opportunities in Crumlin (See Appendix 2) the settlement has the potential to accommodate limited extensions to the settlement development limits defined by the Legacy Plan without significant environmental degradation.

4. CONCLUSIONS

In short there are clear and consistent themes expressed within representations made to date. It is suggested that DPS does not enable the town of Crumlin to maximise its future potential and this is contrary to the expressed aim of the RDS 2030 and previous iterations of the regional strategy (Shaping the Future RDS 2025).

In accordance with related regional guidance A&NBC must now determine whether Crumlin is allowed to fulfill its role in maintaining a strong network of service centres sustaining a key rural hinterland outside Belfast. It is self evident from the wide range of duly made submissions that this would be in accordance with the vision and guiding principles set out in the Regional Development Strategy. In the current circumstances respondents are right to raise questions over the coherence and effectiveness tests. As mentioned strategic planning guidance emphasises the importance of the relationship between the location of housing, jobs, facilities, services and infrastructure.

Adjustments to Strategic Policy 4 in the DPS could manage housing growth in response to changing housing need and direct additional housing growth to settlements like Crumlin to achieve a more sustainable pattern of future development.

We look forward to the publication of the updated version of the proposed Development Plan Document (DPD) following this consultation stage and the reasoned justification of the policies contained within it