

Submitted to Local Development Plan 2030 - Draft Plan Strategy Representations
Submitted on 2019-09-20 14:43:04

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:

Individual

Please specify your contact details:

Title:

Mr

First name:

James

Last name:

Hamill

Job Title (where relevant):

Organisation Name (where relevant):

Agent Name (If applicable):

Client Name (If applicable):

Address:

40 collin road

Postcode (please enter your full postcode):

BT39 9JS

Telephone number:

██████████

What is your email address?

Email:

████████████████████

Please Read Before Continuing. . .

SECTION C - REPRESENTATIONS

Do you consider the draft Plan Strategy to be SOUND or UNSOUND?

I consider it to be 'Unsound'

Unsound Representation

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

Paragraph Number in Document:

sp2.12

Policy Heading:

TOWN CENTERS AND RETAILING

Strategic Policy (SP) Paragraph Number:

sp2.12

Detailed Management Policy (DM) Paragraph Number:**Page Number In Document:**

80 81

Proposal Map (If relevant state location):**Under which test(s) of soundness do you consider this to be UNSOUND:**

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?

Please give details why you consider the draft Plan Strategy to be UNSOUND having regard to the test(s) you have identified above.**Unsound Justification:**

As this Draft plan will guide the future strategic development of our Borough and of our towns I feel it is important to note the following. Whilst there is an array of fantastic work within this Draft Plan, I have two concerns.

Firstly, the draft plan seems to put forward a new categorisation of our existing towns within the Borough, specifically the now Large Town of Ballyclare seems to have been "downgraded" in both title and status. If this is the case, surely it would have ramifications for future investment from both Council and Regional actors?

Secondly, and more worryingly I note the emergence of a district centre /out of town retail centre (Abbey Centre), which seems to have been upgraded within the draft plan from a district centre within metropolitan Newtownabbey to be classified as a Large Town in your draft plan, also being listed comparatively with the main hub / large town of Antrim? Unfortunately as a lay person, I have been unable to follow a coherent strategy or find the evidence within your draft plan or indeed within your supporting papers to support such a position so would challenge the soundness of same under the following tests: C1, C3, C4, CE1 & CE2. From your supporting papers, the metro Newtownabbey area comprises of the 7 urban villages so I fail to see any obvious reason to now identify Abbey Centre as a large town, nor do I not understand how this accrues with existing SPPS. There is abounding evidence that out of town shopping centres have directly reduced footfall from traditional towns and while the current Abbey Centre is certainly a fantastic retail centre and very welcome within our Borough, it is a commercially owned retail shopping centre not a large town. From your Goad Map on p.55 it clearly states the area is made up of compassion retail units, however I was unable to find a reference to it within the housing paper, clearly as there is no residential within the retail centre, again therefore not a large town. Our existing towns have already lost their retail cores as a direct result of historic planning decisions which benefited out of town retail centres. I believe to pursue such a change as listed above would incur future negative ramifications to our existing traditional towns, even more so at a time when our towns are attempting to revitalise and change over the next decade as retail declines. Towns around our residential communities should be able to achieve a range of land uses and be the future anchors of our Borough, so we should not force further future growth sectors out of our towns to retail parks.

Upload File:

Draft Plan response letter.docx was uploaded

Modifications

If you consider the draft Plan Strategy to be 'UN SOUND', please provide details of what, if any, modifications do you think should be made to the section, policy or proposal which your representation relates to? What specific modifications do you think should be made in order to address your representation? Please briefly state how your proposed alternative would meet the requirements of the Sustainability Appraisal and other published assessments.

Modifications:

A coherent and uniform approach to the identifications of towns and town types within our Borough and NI.

Complete Avoidance of a new classification of commercially owned, out of town retail shopping centres as any form of towns. To prevent the morphing from existing bulk items and retail use to mixed use, leisure etc where traditional towns are better suited and plans are already underway to change to such future markets away from declining retail.

File Upload:

No file was uploaded

If you are seeking a modification to the draft Plan Strategy, please indicate how you would like your representation to be dealt with at Independent Examination:

Written Representation

Would you like to submit another representation?

No

James Hamill

40 Collin Road

Ballyclare

Co Antrim

BT39 9JS

18. September 2019

REF: LDP, Draft Plan Strategy Public Consultation

Dear Sirs

Thank you for providing an opportunity to engage on such an important vision for our town and Borough. As this Draft plan will guide the future strategic development of our Borough and of our towns I feel it is important to note the following. Whilst there is an array of fantastic work within this Draft Plan, I have two concerns.

Firstly, the draft plan seems to put forward a new categorisation of our existing towns within the Borough, specifically the now Large Town of Ballyclare seems to have been “downgraded” in both title and status. If this is the case, surely it would have ramifications for future investment from both Council and Regional actors?

Secondly, and more worryingly I note the emergence of a district centre /out of town retail centre (Abbey Centre), which seems to have been upgraded within the draft plan from a district centre within metropolitan Newtownabbey to be classified as a **Large Town** in your draft plan, also being listed comparatively with the main hub / large town of Antrim? Unfortunately as a lay person, I have been unable to follow a coherent strategy or find the evidence within your draft plan or indeed within your supporting papers to support such a position so would challenge the soundness of same under the following tests: C1, C3, C4, CE1 & CE2.

From your supporting papers, the metro Newtownabbey area comprises of the 7 urban villages so I fail to see any obvious reason to now identify Abbey Centre as a large town, nor do I not understand how this accrues with existing SPPS. There is abounding evidence that out of town shopping centres have directly reduced footfall from traditional towns and while the current Abbey Centre is certainly a fantastic retail centre and very welcome within our Borough, it is a commercially owned retail shopping centre not a large town. From your Goad Map on p.55 it clearly states the area is made up of compassion retail units, however I was unable to find a reference to it within the housing paper, clearly as there is no residential within the retail centre, again therefore not a large town.

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Kind Regards

James Hamill