

Submitted to **Local Development Plan 2030 - Draft Plan Strategy Representations**
Submitted on **2019-09-20 09:26:21**

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:

I am an Agent

Please specify your contact details:

Title:

Mrs

First name:

Carrie

Last name:

McDonagh

Job Title (where relevant):

Managing Director

Organisation Name (where relevant):

One2One Planning Ltd

Agent Name (If applicable):

Client Name (If applicable):

Nutts Corner Enterprise Park

Address:

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Telephone number:

07920 583648

What is your email address?

Email:

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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:

Para 5.28 (Page 88 para 5.28)

Policy Heading:

Policy DM 1 – Economic Development – Zoned Sites and Settlements

Strategic Policy (SP) Paragraph Number:

SP2 Employment (starts at Para 76)

Detailed Management Policy (DM) Paragraph Number:

Policy DM 1.1

Page Number In Document:

88

Proposal Map (If relevant state location):

Under which test(s) of soundness do you consider this to be UNSOUND:

CE2 - Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?,
CE4 - Is it reasonably flexible to enable it to deal with changing circumstances?

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:

Policy DM 1 – Economic Development – Zoned Sites and Settlements (Page 88) Strategic Employment Locations

Nutts Corner is identified as an existing SEL at SP 2.5 in Table 3 (Page 77) which is fully supported. The corresponding policy of D.M 1.1 states that acceptable uses at the Nutts Corner SEL will be limited to industrial development, transport and logistics and storage and distribution proposals.

DM 1.1 is unsound for a number of reasons:

1) DM1 references settlements in the policy title. The supporting text at Paras 5.26-5.28 clearly focuses on the sustainability aspect of settlements. Nutts Corner would appear to be misplaced in this policy at DM 1.1 given it is in a countryside location without a current designated boundary (noted at Table 3 as within locations outside of settlements i.e. in the countryside). It would therefore be more accurate for it to have a separate policy for clarity.

This was the approach envisaged in the evidence paper as per 11.29 (the Economic Growth Evidence Paper No 3) which states:

'The application of a tailored planning policy for this SEL, along with supplementary key site requirements is considered the best way to secure the areas potential for landscape enhancement as identified in both the 1999 and 2018 landscape character assessments and the Nutts Corner DCAN.

This has not been done and instead the policy context for the area is merged within the policy for zoned sites and settlements.

2) Omission of strategic requirements related to delivery.

At SP 2.5 Nutts Corner is listed in Table 3 as an SEL, the reader is advised that the precise boundaries will be brought forward in the local policies plan. The corresponding policy in DM 1.1 provides no strategic information on how Nutts Corner is to be developed despite Council having undertaken work in assessing what is required to make the Nutts Corner SEL deliverable and successful.

In the evidence paper 3 - Economic Growth, at Paragraph 11.12, it acknowledges that four of the six roads leading to the roundabout are protected routes and notes the 2+1 single carriageway scheme proposed on the A26 to Moira by TNI. At 11.17, it refers to the evidence used within the Aecom Strategic Transport Assessment in order to assess traffic used as a result of the Nutts corner SEL. That document recommends enhanced public transport stops and services which could be developed as recommended by Translink. It notes that traffic growth in the locality is rising by around 1% per annum, which is not significant. It concludes that this information will influence the size of the SEL to be determined at local policies stage and considered mitigation in order to gain access to the protected route via a developer led spine road.

A Spine Road is a strategic matter, it arises from a strategic transport assessment and Council and TNI consider it necessary to manage the safety aspects around access to a protected route and it is a necessary mechanism to deliver the planned growth.

To ensure zonings are robust there should be certainty around the deliverability of the zoning and it should be clear if the planned spine road is deliverable. Without knowing the number of landowners that could be expected to contribute to such a road it cannot be clear that the zoning can be delivered.

In addition, on page 45 and para 11.33 it appears that digital connection is a priority and data connectivity may be a further requirement of any development of the SEL. If this is to be developer funded this should also be set out at within the overarching policy for the area.

3) Omission of business uses & R&D from list of acceptable uses.

The policy does not include for business uses or for research and development uses with little explanation provided in the evidence paper for their omission. A strategic policy specifically for Nutts Corner would have assisted in the promotion of a greater range of uses including B1 and B2 use classes.

4) There is no distinction between Area 1 and 2 as referred to in the Evidence Paper 3:Economic Growth

Under the next steps section for Nutts Corner SEL it highlights 2 areas at Paragraph 11.30. Area 1 was considered the more appropriate area for development in

the DCAN (which is based on the old airfield and which was noted as suitable for road haulage and distribution industries and similar uses). Area 2 described as much less developed. This representation relates to Area 1 in the DCAN for which there should be recognition in policy for their Historic Uses. On small areas at Nutts Corner Council do not consider there to be an existing use on the land. The passage of time makes demonstration of previous business uses difficult but these areas still have obvious characteristics of the airfield remaining: they are brownfield land. This land should still be a source of employment growth as it is more sustainable than greenfield expansion but that is not clear from policy.

5) Lack of Flexibility to manage the planned Growth towards 9,000 new jobs

Evidence Paper 3: Economic Growth provides the background to the Councils policy recommendation for the area. It clearly expects Nutts Corner SEL to be a success in contributing towards this target.

In the section on rural employment land it states that:

'In response to ongoing large scale development pressure, the Council has recognized the extensive employment growth already in existence at Nutts Corner and the airport through designating them as strategic employment locations. Both sites are already home to a number of large scale business including storage and distribution, which require accessible and central locations (page 37 para 10.4)'.

At section 11 it specifically provides the detail behind the Nutts Corner SEL. It states Council have recognized the ongoing development pressures and extensive employment growth already in existence, noting the areas accessible and central location.

Paragraph 11.8 it refers to the level of business interest in this strategic location being evident from the wide support for stakeholders for the SEL designation during the Councils POP public consultations. These representations called, not only for formal recognition of the existing development, but also for additional growth.

It notes that 50% of NI's population live within 20mins drive of the site and at 11.11 it notes that Nutts Corner is in close proximity to the Belfast International Airport Gateway on a key transport corridor and economic corridor which have a fundamental role to play in regional growth.

However, there is a lack of detail on how the SEL delivery will be monitored to show if the intended job creation target is on course.

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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:

Nutts Corner SEL should have a distinct policy commensurate with the importance of the site in the delivery of the boroughs job creation potential.

Rather than leaving all strategic infrastructure requirements to the key site requirements in the local policies paper a more sensible approach would be for Council to commit to undertake a masterplan for the SEL given the varying land ownership and variation in ability of access to the road network and water/sewerage network. This could also outline any requirement for data connections and the required hard landscaping structure that is necessary to form a visually attractive gateway. In that way developers would have more certainty in respect of the level of contributions that may be necessary in their site selection process, bringing more certainty that the job creation anticipated can be delivered.

The brownfield context of the old airfields should be recognised within Area 1 of the previous DCAN and the full scope of employment related businesses should be delivered at the site including business use classes and research and development .

Council clearly envisage significant growth in this area but the policy provides no opportunity for flexibility to be able to quickly react to changing circumstances as is often the case in the job market with variations in supply and demand for different sectors. The inclusion of the business use class within the range of acceptable uses would assist in providing this flexibility as often this is the most appropriate use class for business start ups.

More flexibility is required in the policy approach to allow for exceptions which can contribute the job creation potential for the area. While historic uses sit as a material consideration in any planning application, the policy should contain more flexibility where the use has ceased and should contain a provision to allow temporary or meanwhile uses to take place given the scale of infrastructure works may delay implementation of the wider SEL objectives. This would be more consistent with the optimism displayed within the evidence paper on strategic growth and would allow for further development based on historic uses and brownfield characteristics of the land.

The balance towards industrial and storage and distribution uses can still be maintained by references to the business uses or research and development uses being ancillary to the permissible uses in DM 1.1 or a percentage cap could be included to control the areas in use by non storage and distribution, transportation or industrial users.

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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?

Yes

Additional Representation 2

What does your second representation relate to?

A 'Sound' representation

Representation 2 - SOUND

If you consider the draft Plan Strategy to be SOUND and wish to support the document, please set out your comments below:

Sound Justification:

Support for Nutts Corner Strategic Employment Location and Strategic Growth Strategy as set out below:

Strategic Policy 2 Employment (paragraph 5.5, Page 76,) Employment Land - SP 2.2 and 2.3 is supported as it relates to the inclusion of Nutts Corner as an SEL.

The Spatial Growth Strategy states at part F (Page 65 Paragraph 4 Sustainable Development) 'Strengthen the role of Belfast International Airport as a regional gateway and recognize the importance of Nutts corner as a strategic location for employment on the Regional Strategic Transport Network.

SP 1.7 states that 'growth in homes, jobs, infrastructure and services that accords with the Spatial Growth Strategy and constitutes sustainable development will be welcomed by the Council'.

SP 1.11 states that ' in all locations, proposals that re use or make better use of vacant, derelict or under used brownfield land or buildings will be supported where they are in accordance with the relevant policies of the LDP'.

All are supported in line with the principles of sustainable development and job creation.

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Would you like to submit another representation?

No