

Submitted to **Local Development Plan 2030 - Draft Plan Strategy Representations**  
Submitted on **2019-09-13 18:40:47**

## 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):**

Antrim Agri Fertilisers Limited

**Address:**

1 Larkfield Avenue  
Upper Lisburn Road  
Belfast

**Postcode (please enter your full postcode):**

BT10 0LY

**Telephone number:**

07920 583648

**What is your email address?**

**Email:**

carrie@one2one-planning.co.uk

**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:**

5.30

**Policy Heading:**

Economic Development -Countryside

**Strategic Policy (SP) Paragraph Number:**

SP 2

**Detailed Management Policy (DM) Paragraph Number:**

DM 2 in particular 2.6 and 2.7

**Page Number In Document:**

91

**Proposal Map (If relevant state location):**

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

C3 - Did the Council take account of policy and guidance issued by the Department?, 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:**

Strategic Policy 2 - Policy DM2 Economic Development Countryside

DM 2.6 states that 'the Council will support proposals for the expansion of an established rural enterprise or its redevelopment for industrial or business use within the confines of the existing site subject to normal planning and environmental considerations'.

DM 2.7 states that 'Proposals involving a new building(s) and/or an expansion of the existing site area will be acceptable where it is demonstrated:

- (a) There is a business need for the proposal and relocation of the enterprise is not feasible for operational or employment reasons;
- (b) The proposal will make a significant contribution to the local economy; and
- (c) The development will respect rural character, be appropriately integrated into its surroundings and deliver local biodiversity benefits.

These policies should be consistent with The Spatial Growth Strategy which states at part E that the plan aims to 'Sustain and maintain our rural area through the accommodation of suitable small scale housing and employment opportunities in our hamlets and the countryside'.

SP 1.10 states that 'In the countryside, development proposals will be supported in principle where they accord with the relevant policies and/or designations of the LDP, and are of a scale and nature appropriate to the location. Other development will only be permitted where there are overriding reasons why it is essential and could not be permitted within a settlement

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'.

Against this background, Council have not in considered the unique circumstances in the borough as is a requirement of the SPPS. A number of old World War 2 airfields exist and offer a unique opportunity for economic growth. While Nutts Corner is recognised, there are others including Largy Road Industrial Area with numerous old buildings and sheds and runways remnants relating to the old airfield. This is the basis of the numerous industrial premises in the Largy Road area.

The evidence base in Evidence Paper 3 - Economic Growth refers to the wide range of other rural employment sites (outside Nutts Corner and Belfast International Airport) and notes 'the Council recognises that there are a wide range of other rural employment sites. These include existing employment uses at Largy Road, Old Ballyrobin Road, Templepatrick Road, Kilbride Road, Craigstown Road and a number of other locations. The Council recognises they are all valuable contributors to rural employment opportunities and support the Boroughs rural communities.

It is unsurprising that the Largy Road Industrial Area is recognised within the evidence paper given it is just 3.4km from Crumlin, with ease of access to the strategic road network, has associated directional signage and includes significant industrial buildings.

At its periphery is an extant approval for a 23 unit business park (LDE for T/2007/0035/F attached ) and a legal start was also made prior to expiry on a storage and distribution warehouse to the rear of the site where it abuts Gortnagallon Road (T/2004/0575).

Despite the recognition of these assets they are not identified as local employment areas and are treated as greenfield sites and retained in the open countryside. The DPS then fails to identify them for appropriate development, instead considering the policy regime to be similar to that in the current PPS 4 and at SP 2.4 it states that 'The Council will also support sustainable economic growth in the countryside where this accords with Policy DM2'.

To provide for growth on these old airfield sites the new Policy DM 2 therefore needs to cover all circumstances for economic growth in those old airfields as listed within the evidence paper.

Policy DM 2.6 refers to 'the expansion of an established rural enterprise' and Policy DM 2.7 refer to the need for a business case. Neither part of the policy allows for the land within the Largy Road industrial area that is not already in use or the large industrial curtilages which extend beyond the existing buildings. These old

airfields are brownfield sites with significant areas sitting outside the main buildings which are still a significant resource and their redevelopment is more sustainable than new greenfield development.

The policy DM 2 leaves a void for new buildings within those portions of these countryside industrial areas which do not have buildings currently in use and they cannot therefore be counted as an extension to an existing enterprise or have a business need case under DM 2.7. The plan needs to introduce a policy to clarify that it is entirely appropriate for new buildings for employment uses in place of the old airfield buildings and bunkers even if they have not been in recent use. This will help with the overall objectives of rebalancing the economy while still protecting the natural environment by avoiding the use of new greenfield sites.

**Upload File:**

LA03\_2019\_0203\_LDE confirmation of legal start on T\_2007\_0035\_F .pdf was uploaded

**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.**

**Modifications:**

The policy DM 2 leaves a void for the brownfield sites previously used as the WW2 airfields.

DM 2.6 should be varied along the lines of 'The Council will support proposals for the expansion or redevelopment of an established rural enterprise or the redevelopment of vacant buildings and bunkers within the brownfield sites previously used as WW2 airfields for industrial or business use within the confines of the existing site subject to normal planning and environmental criteria'.

This will allow for the redevelopment of old buildings and bunkers within those portions of these countryside industrial areas which are covered in the old airfield hardstanding or outside storage but are not currently in an established employment use or in use as business premises given they are more sustainable than greenfield sites in the open countryside.

**File Upload:**

Largy Rd industrial area hardstanding example.docx 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

**CERTIFICATE OF LAWFULNESS OF EXISTING USE OR DEVELOPMENT**

**Planning Act (Northern Ireland) 2011: Section 169**

Application No: **LA03/2019/0203/LDE**

Date of Application: **8th March 2019**

Site of Proposed  
Development:

**Lands 60m SW of 73 Largy Road  
Crumlin  
BT29 4RS**

Description of Proposal:

**Lawful implementation of Block of 4 business units which  
form part of permission ref T/2007/0035/F. Confirmation  
that works have been undertaken to commence the erection  
of one block of business units.**

Applicant: Antrim Agri Fertilisers Ltd  
Address: 73 Largy Road  
Crumlin  
BT29 4RS

Agent: One2One Planning  
Address: 1 Larkfield Avenue  
Belfast  
BT10 0LY

Drawing Ref: 01 & 02

The Council hereby

**CERTIFIES**

that on **8th March 2019** the use described in the First Schedule to this certificate in respect of the land specified in the Second Schedule to this certificate and edged red on the plan attached to this certificate, would have been lawful within the meaning of Section 169 of the Planning (Northern Ireland) 2011, for the following reason:

1. The Council, having considered the information provided, is satisfied that sufficient evidence has been submitted to show that the operations specified in the First Schedule and shown on the attached drawings Nos 01 & 02 which were received on 08 March 2019, benefited from the planning permission granted by planning approval ref: T/2007/0035/F dated 07 March 2014.

Informatives

1. The description of the Certificate of Lawful Use or Development (Existing) has been amended by the Council, under the powers granted to it by Section 169 (4) of the Planning Act (Northern Ireland) 2011.

Dated: 8th April 2019    Authorised Office



The First and Second Schedule are attached hereto together with a plan. Please read the footnotes including your rights of appeal.

Schedules and Notes attached to:

### **CERTIFICATE OF LAWFULNESS OF EXISTING USE OR DEVELOPMENT**

Application No: LA03/2019/0203/LDE  
Applicant: Antrim Agri Fertilisers Ltd  
Location: Lands 60m SW of 73 Largy Road  
Crumlin  
BT29 4RS

=====

#### **FIRST SCHEDULE**

#### **Description of use certified:**

**Excavation and laying of foundations for one block comprising 4 approved business units (annotated 12-15), in accordance with planning permission ref T/2007/0035/F.**

#### **SECOND SCHEDULE**

#### **Land specified in the Certificate:**

**Lands 60m SW of 73 Largy Road  
Crumlin  
BT29 4RS**

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**NOTES:**

1. This certificate is issued solely for the purpose of Section 169 of the Planning Act (Northern Ireland) 2011.
2. It certifies that the use specified in the First Schedule taking place on the land described in the Second Schedule was lawful, on the specified date and, thus, was not liable to enforcement action under Section 138 or 139 of the Planning Act (Northern Ireland) 2011.
3. This certificate applies only to the extent of the use described in the First Schedule and to the land specified in the Second Schedule and identified on the attached plan. Any use which is materially different from that described or which relates to other land may render the owner or occupier liable to enforcement action.
4. If this Certificate has been granted in a form which the Council has modified the description of the use, operations or other matter in your application or has substituted an alternative description for that description and if you do not accept the Council's decision you may appeal by giving notice to the Planning Appeals Commission (PAC). Under Section 173 (appeals against refusal or failure to give decision on application) of the Planning Act (Northern Ireland) 2011 and Article 11(6) of the Planning (General Development Procedure) Order (Northern Ireland) 2015.



# Planning Act (NI) 2011

## CERTIFIES A CERTIFICATE OF LAWFULNESS

As set out on Certificate Ref No.



Antrim and  
Newtownabbey  
BOROUGH COUNCIL

Date

3-4-19

GORTNAGALLON

Drawing  
Number 01



Antrim and  
Newtownabbey  
BOROUGH COUNCIL

War  
Museum

1.568

4.396

0.471

Factory

44.8

45.7

46.6

Planning Section  
RECEIVED

08 MAR 2019

File No.

2.809

PROJECT

Proposed Business Park, Largy Road, Crumlin

TITLE

Location Plan

LA03 / 2019 / 0203

Date

12-12-06

Drawn By

AMcG

Checked By

KMcC

Scale

1:2500

Job No

367

Drawing No

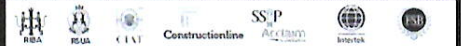
E02

Rev.

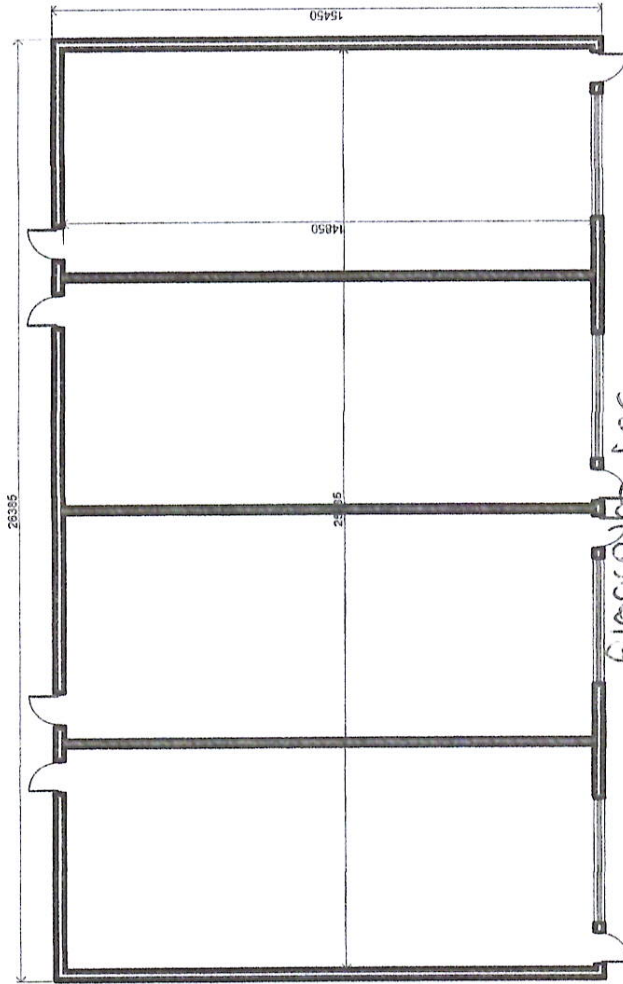
McLean & Forte  
Chartered Architects

McLean & Forte Partnership  
37 Malone Road  
Belfast  
BT9 6RX

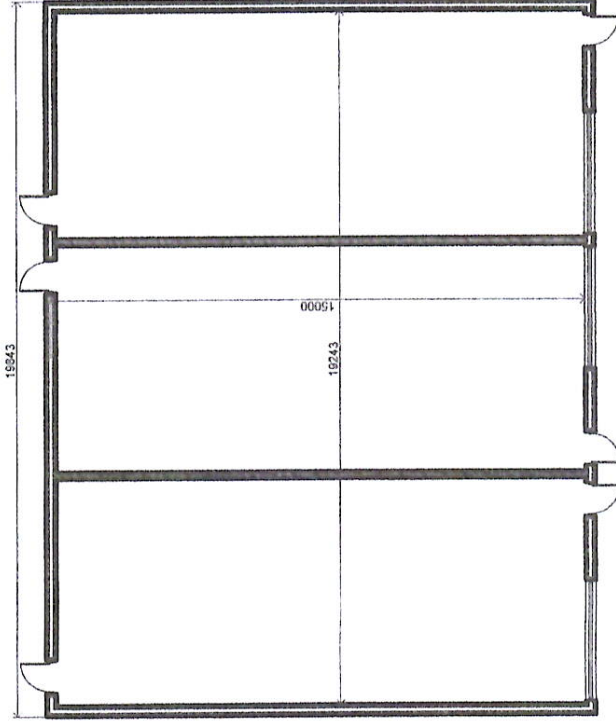
T: (028) 9066 9411  
F: (028) 9038 1367  
E: office@mcleanforte.com  
W: www.mcleanforte.com



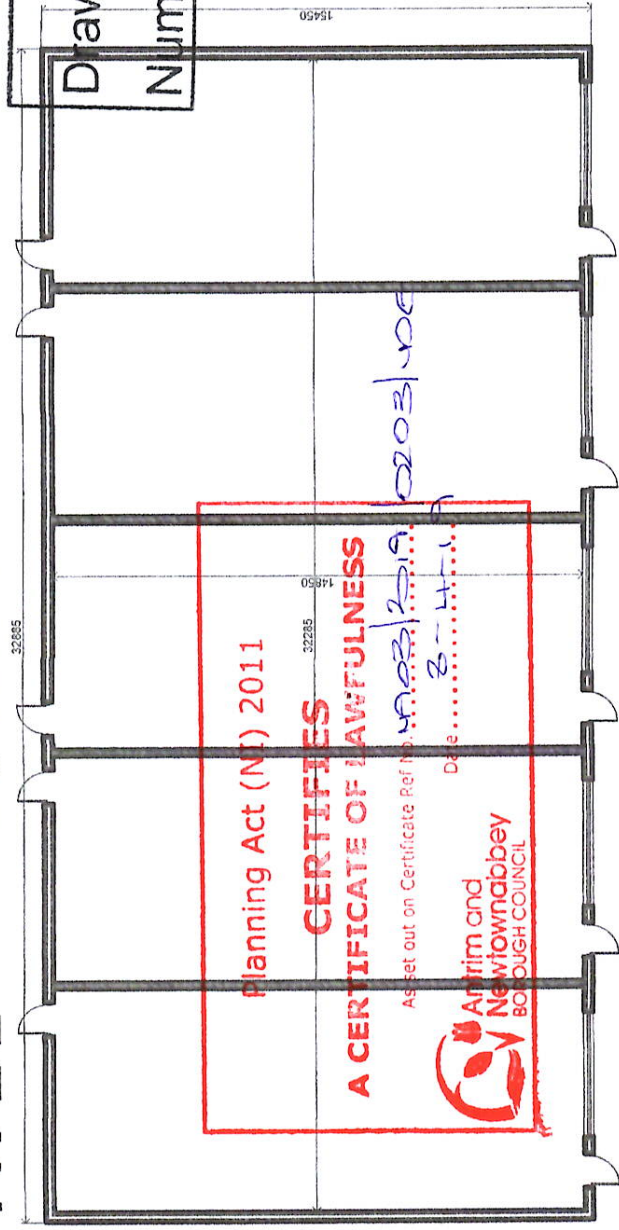





**TYPE 2**



**TYPE 3**



**TYPE 1 (A)**

Planning Act (NI) 2011  
**CERTIFIES**  
**A CERTIFICATE OF LAWFULNESS**  
 As set out on Certificate Ref No. **HA03/2019/0203/06**  
 Date **08 MAR 2019**  
  
**Antrim and Newtownabbey**  
**BOROUGH COUNCIL**

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Drawing

Number 02

REV	DATE	OWN BY	AMENDMENT
PROJECT Crumlin Industrial Estate			
TITLE Floor Plans 1			
Date	15.01.14	Drawn By	MM
Scale	1:200	Checked By	KMcC
Job No	367	Drawing No	SK12
Rev.			

File No. <b>HA03 / 2019 / 0203</b>	
Planning Section RECEIVED <b>08 MAR 2019</b>	
McClean & Forte Partnership 37 Malone Road Belfast BT9 6RX T: (028) 9066 9411 F: (028) 9038 1367 E: office@mcleanforte.com W: www.mcleanforte.com	
McClean & Forte Chartered Architects	

