

Submitted to Local Development Plan 2030 - Draft Plan Strategy Representations
Submitted on 2019-09-20 16:43:47

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:

Individual

Please specify your contact details:

Title:

Mr

First name:

John

Last name:

Eltham

Job Title (where relevant):

Director

Organisation Name (where relevant):

PUDSI

Agent Name (If applicable):

Client Name (If applicable):

Address:

41 Walnut Street

BELFAST

Postcode (please enter your full postcode):

BT7 1EN

Telephone number:

██████████

What is your email address?

Email:

john@pudsi.com

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:

Policy Heading:

Strategic Policy (SP) Paragraph Number:

SP 2.12 and SP 2.13

Detailed Management Policy (DM) Paragraph Number:

Page Number In Document:

78 and 79

Proposal Map (If relevant state location):

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

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?

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:

The Title should perhaps be changed to Town Centre Uses (including retailing) to make it explicitly clear that it applies to all town centre uses.

The use of the term "retail centres" is misleading and should be replaced with the term "mixed use centres"

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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:

As specified in previous section.

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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?

An 'Unsound' representation

Representation 2 - UNSOUND

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

Paragraph Number in Document:

Policy Heading:

Development Outside Centres

Strategic Policy (SP) Paragraph Number:

Detailed Management Policy (DM) Paragraph Number:

DM 7.1 and DM 7.2

Page Number In Document:

100

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?

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:

Use of the words "that generate significant footfall" lacks clarity and would be open to interpretation. There are uses that do not generate generate significant footfall but should still be directed to locations in town centres and other mixed use service centres.

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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:

The words "that generate significant footfall" should be omitted.

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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 3

What does your third representation relate to?

An 'Unsound' representation

Representation 3 - UNSOUND

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

Paragraph Number in Document:

Policy Heading:

Development at The Junction, Antrim

Strategic Policy (SP) Paragraph Number:

Detailed Management Policy (DM) Paragraph Number:

DM 8.2

Page Number In Document:

102

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?

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:

The policy is not explicit enough to restrict development of the full range of uses that should be directed to Antrim town centre.

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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 list of restricted uses should continue as follows:

- (d) Proposals for office or call centre use
- (e) Proposals for food and drink uses
- (f) Proposals for commercial leisure uses
- (g) Proposals for community and cultural uses including for the display of works of art, as a museum, as a public library or reading room, as a public hall or exhibition hall; and
- (h) Proposals for assembly and leisure uses including use as a bingo hall, cinema, concert hall, dance hall or theatre

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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 4

What does your fourth representation relate to?

An 'Unsound' representation

Representation 4 - UNSOUND

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

Paragapgh Number in Document:

Policy Heading :

Belfast International Airport SEL

Strategic Policy (SP) Paragraph Number:

SP 2.8

Detailed Management Policy (DM) Paragraph Number:

Page Number in Document:

78

Proposal Map (If relevant state location):

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

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:

The policy permits "business" and "other complementary employment and service uses" at this location. This would allow uses that should be directed to a town

centre or mixed use service centre location.

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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 should be reworded to make it explicit that town centre uses would not be permitted in the Belfast International Airport SEL.

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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 5

What does your fifth representation relate to?

An 'Unsound' representation

Representation 5 - UNSOUND

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

Paragraph Number in Document:

Policy Heading:

Economic Development

Strategic Policy (SP) Paragraph Number:

Detailed Management Policy (DM) Paragraph Number:

DM 1

Page Number In Document:

88-89

Proposal Map (If relevant state location):

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

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:

Policy DM 1 would allow town centre uses such as offices and call centres in SELs and other zoned employment sites. Such uses should be directed to town centres and smaller mixed use service centres.

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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:

Policy DM 1 should explicitly indicate that town centres are an appropriate and preferred location for office and call centre development.

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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 6

What does your sixth representation relate to?

An 'Unsound' representation

Representation 6 - UNSOUND

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

Paragraph Number in Document:

Policy Heading:

Town centre boundaries

Strategic Policy (SP) Paragraph Number:

SP 2.13

Detailed Management Policy (DM) Paragraph Number:

Page Number In Document:

79

Proposal Map (If relevant state location):

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

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:

It is unclear what status the proposed draft centre boundaries defined in Appendix F of Evidence Paper 4 have.

The lack of new defined town centre boundaries at Plan Strategy stage has the potential to limit town centre first development and will delay the proper implementation of the relevant policies.

The proposed draft town centre boundaries are too restrictive and do not allow for the full realisation of potential development opportunities in some locations and particularly in Antrim.

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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 :

Town centre boundaries should be defined at Plan Strategy stage and should be more generous than those indicated in the evidence paper (see attached maps)

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Town-Centre-Boundaries.pdf 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?

Yes

Additional Representation 7

What does your seventh representation relate to?

An 'Unsound' representation

Representation 7 - UNSOUND

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

Paragraph Number in Document:

Policy Heading:

Strategic Policy (SP) Paragraph Number:

SP 2.12

Detailed Management Policy (DM) Paragraph Number:

Page Number In Document:

79

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?, 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:

The Global Point SEL and land to the north on the opposite side of the railway offer one of the most accessible locations in Northern Ireland being adjacent to a key transport corridor and having excellent public transport and active travel connections.

Additionally, the site is in close proximity to key civic and recreational uses including Mossley Mill and Ballyearl.

An opportunity exists here for high density mixed use development that will take advantage of these characteristics.

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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 :

The land in the Global Point site located between the Three Mile Water and the railway, plus the land between the Ballyearl centre and the railway should be

defined as a mixed use service centre (possibly a town or district centre) and should be the focus of high density urban development including offices (already permitted at Global Point).

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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:

Oral Hearing

Would you like to submit another representation?

No