

Response ID ANON-3WQE-DUP1-T

Submitted to **Local Development Plan 2030 - Draft Plan Strategy Representations**
Submitted on **2019-09-20 12:16:36**

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:

Organisation

Please specify your contact details:

Title:

Mr

First name:

Sinn Féin

Last name:

Goodman

Job Title (where relevant):

Councillor

Organisation Name (where relevant):

Sinn Féin

Agent Name (If applicable):

Client Name (If applicable):

Address:

██████████

Postcode (please enter your full postcode):

██████████

Telephone number:

██████████

What is your email address?

Email:

michael.goodman@sinnfein.ie

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:

7.3

Policy Heading:

Homes

Strategic Policy (SP) Paragraph Number:

4

Detailed Management Policy (DM) Paragraph Number:

DM17.1

Page Number In Document:

88-96

Proposal Map (If relevant state location):

Figure 10

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?, 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:

The policy significantly underestimates the housing need in the Antrim and Newtownabbey Borough. It is a significant reduction in previous growth estimates, identified in previous work carried out by the ANBC planning department. The model of growth is significantly reduced from previous growth levels seen in the area in previous years and does not seem to take into account the severe need in the neighbouring area of North Belfast.

Upload File:

No file 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:

The plan should revert to the previous estimate of 13,500 new homes over the period of the plan.

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

Additional Representation 2

What does your second representation relate to?

An 'Unsound' representation