
Consultation Period

Antrim and Newtownabbey Borough Council has published its draft Plan Strategy, the first formal stage of the new Local Development Plan 2030, for public consultation.

The draft Plan Strategy is the first of two documents, which comprise the Local Development Plan 2030. It has been developed following extensive engagement with the public, stakeholders and our elected Members, including the publication of our Preferred Options Paper.

The draft Plan Strategy sets out how our Borough will grow and change up to the year 2030. It puts forward our Plan Vision for the future. It also contains a Spatial Growth Strategy indicating at a strategic level where growth should go in the Borough. It also sets out a range of Strategic Policies and Detailed Management Policies, which together will guide future planning decisions.

The draft Plan Strategy is published for formal public consultation over an 8-week period and the Council is inviting the submissions of representations, beginning on **Friday 26 July and closing on Friday 20 September 2019 at 5pm.**

The submission of representations in relation to the Council's draft Plan Strategy provides an opportunity for the public to influence the policies and proposals for the future planning and development within Antrim and Newtownabbey.

Please note that representations received after the closing period will not be accepted and will be subsequently returned.

Published alongside the draft Plan Strategy are a range of assessments including Sustainability Appraisal (incorporating the Strategic Environmental Assessment), a draft Habitats Regulation Assessment and an Equality (Section 75) Screening and Rural Needs Impact Assessment Report. These assessments are also subject to public consultation during the formal public consultation period closing on Friday 20 September 2019 at 5pm.

Copies of the draft Plan Strategy and all supporting documents are available to view and download from our website at:

www.antrimandnewtownabbey.gov.uk/draftplanstrategy.

Copies of all documents are also available for inspection at the Council Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8.30am to 5pm. Hard copies of the draft Plan Strategy are also available upon request.



Soundness Testing

A key feature of Northern Ireland's new Planning System is 'Soundness' which requires the draft Plan Strategy document to be tested at Independent Examination (IE) in terms of content, conformity and the process by which it has been prepared. Derived from established practices in England and Wales, it is considered that 'Soundness' testing will provide a more effective basis for examining Local Development Plans and consequently contribute towards a shorter IE process.

The purpose of the IE is to determine if the draft Plan Strategy satisfies statutory requirements and is 'sound'. The presumption will be that the draft Plan Strategy is 'sound' unless it is shown to be otherwise as a result of evidence considered at the IE stage.

The tests of soundness are based upon three categories which relate to how the draft Plan Strategy has been produced, the alignment of the document with central government regional plans, policy and guidance and the coherence, consistency and effectiveness of the content of the draft Plan Strategy. The tests of soundness are set out below:

Procedural Tests	
P1	Has the DPD* been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
P2	Has the Council prepared its Preferred Options Paper and taken into account any representations made?
P3	Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?
P4	Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
Consistency Tests	
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 Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining Council's district?
Coherence and Effectiveness Tests	
CE1	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 DPDs of neighbouring Councils.



CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.
*Development Plan Document (DPD) – Comprises of the draft Plan Strategy	

Further information on Soundness can be found in Development Plan Practice Notes published by the Department for Infrastructure (DfI). Of particular relevance is Practice Note 6 'Soundness' (Version 2) and Practice Note 9 'Submission and Handling of Representations', both are available to view at <https://www.infrastructure-ni.gov.uk/publications/development-plan-practice-notes>.

In addition, the Planning Appeals Commission has also produced guidance entitled 'Procedures for Independent Examination of Local Development Plans' available at <https://www.pacni.gov.uk/procedural-guides>.

Making a Representation

As the main purpose of the IE is to determine whether the Development Plan Document (DPD) is 'sound', any person(s) wishing to make a representation to any part of the Plan should do so on the grounds of soundness. Any representation proposing a change to the Plan must demonstrate why the document is not sound having regard to the tests of soundness. Every representation should say precisely how the Plan should be changed in order to achieve soundness and should be supported, succinctly, by all the evidence thought necessary to justify the proposed change. Once the public consultation period has closed, **there will be no further opportunity to submit information unless the Commissioner requests it.**

Where several people share a common view on how the draft Plan Strategy should be changed, we encourage you to co-operate with each other, pool resources and make a single representation, for example, a local community group.

Those who make representations to the draft Plan Strategy should state whether they wish to have their representation considered at IE in writing or as an oral hearing. Unless people specifically request an oral hearing, the Commission will proceed on the basis that you are content that your representation will be considered in writing. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orally or in written form.



Points to Remember:

- Representations will be made publicly available for inspection at the Council's Offices and online for counter-representations;
- Complete all relevant sections of the response form;
- Clearly state why you consider the draft Plan Strategy to be 'unsound', having regard to the soundness tests;
- There will be no further opportunity to submit information once the public consultation period closes unless the Commissioner requests it;
- We would encourage you to submit separate forms for each representation you wish to submit;
- Every representation should say precisely how the draft Plan Strategy should be changed in order to achieve soundness;
- Representations should be supported, succinctly, by all the evidence thought necessary to justify the proposed change; and
- Clearly, state whether you wish for your representation to be heard orally or in writing.

Submitting Your Representation

We recommend that you submit your representation via our on-line consultation hub, at www.antrimandnewtownabbey.gov.uk/consultations, as this is the most efficient way to make a representation.

However, you can make a representation by completing this form and returning to us by **5pm on Friday 20 September 2019** either by email or by post.

Representations received after the closing period will not be accepted and will be subsequently returned.

What Happens Next

When the consultation has closed, the Forward Planning Team will collate the representations received and as soon as reasonably practicable, publish these online for a further 8-week period of consultation to allow counter-objections to be made. The representations will also be available for public inspection during this period at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to 5pm.

Once this period of counter-representations has closed, the Forward Planning Team will collate the counter-representations and publish these online. They will also be made available for public inspection at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to



5pm. The next anticipated step will be for the Council to contact the Department for Infrastructure to request an Independent Examination of the draft Plan Strategy.

Contact Us

For further assistance, please contact the Forward Planning Team at Mossley Mill, Newtownabbey:

By Post – Forward Planning Team

Mossley Mill

Carnmoney Road North, Newtownabbey

BT36 5QA

By Email – planning@antrimandnewtownabbey.gov.uk

By Telephone – 0300 123 6677



SECTION A – DATA PROTECTION AND CONSENT

Antrim and Newtownabbey Borough Council complies with the General Data Protection Regulation (GDPR) by producing a specific Local Development Plan Privacy Notice, which lets you know how we manage any personal information we receive from you. It contains the standards you can expect when we ask for, or hold, your personal information and an explanation of our information management security policy.

The Local Development Plan Privacy Notice can be found on our website at www.antrimandnewtownabbey.gov.uk/gdpr/planning-gdpr/.

Please note that when you make a representation (or counter-representation) to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the Council's website.

Copies of all representations will be provided to the DfI and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for Independent Examination. A Programme Officer will also have access to this information during the IE stages of the Plan preparation

DfI, the Programme Officer the Independent Examiner will, upon receipt, be responsible for the processing of your data in line with prevailing legislation.

1. 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.

You can contact the Council's Data Protection Officer via:

Post - Antrim Civic Centre, 50 Styles Way, Antrim BT41 2UB

Email - DPO@antrimandnewtownabbey.gov.uk

Phone - 028 9446 3113



SECTION B – YOUR DETAILS

2. 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?

If you are responding as an agent or representing an organisation you will be the main point of contact for your client/organisation.

(Please select only one item)

- Individual
 Organisation
 Agent

	Personal Details	Agent Details (If Applicable)
Title		Mr
First Name		Chris
Last Name		Tinsley
Job Title (where relevant)		Senior Town Planning Consultant
Organisation (where relevant)	Northstone (NI) Ltd	Quarryplan Ltd
Client Name (where relevant)		
Address	99 Kingsway Dunmurry	10 Saintfield Road Crossgar
Post Code	BT17 9NU	BT30 9HY
Telephone Number	028 9055 1200	028 44 832 904
Email Address	info@northstone-ni.co.uk	chris@quarryplan.co.uk



SECTION C – REPRESENTATION

Your comments should be set out in full. This will help the Independent Examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

3. To which part of the draft Plan Strategy does your representation relate?

i) Paragraph Number: __See attached letter but primarily Policy DM44__

ii) Policy Heading: _____Mineral Reserve Policy Areas_____

➤ Strategic Policy (SP) Paragraph Number:

➤ Detailed Management Policy (DM) Paragraph Number:

_____44.2_____

iii) Page Number in Document: _____270_____

iv) Proposal Map (if relevant state location): _____

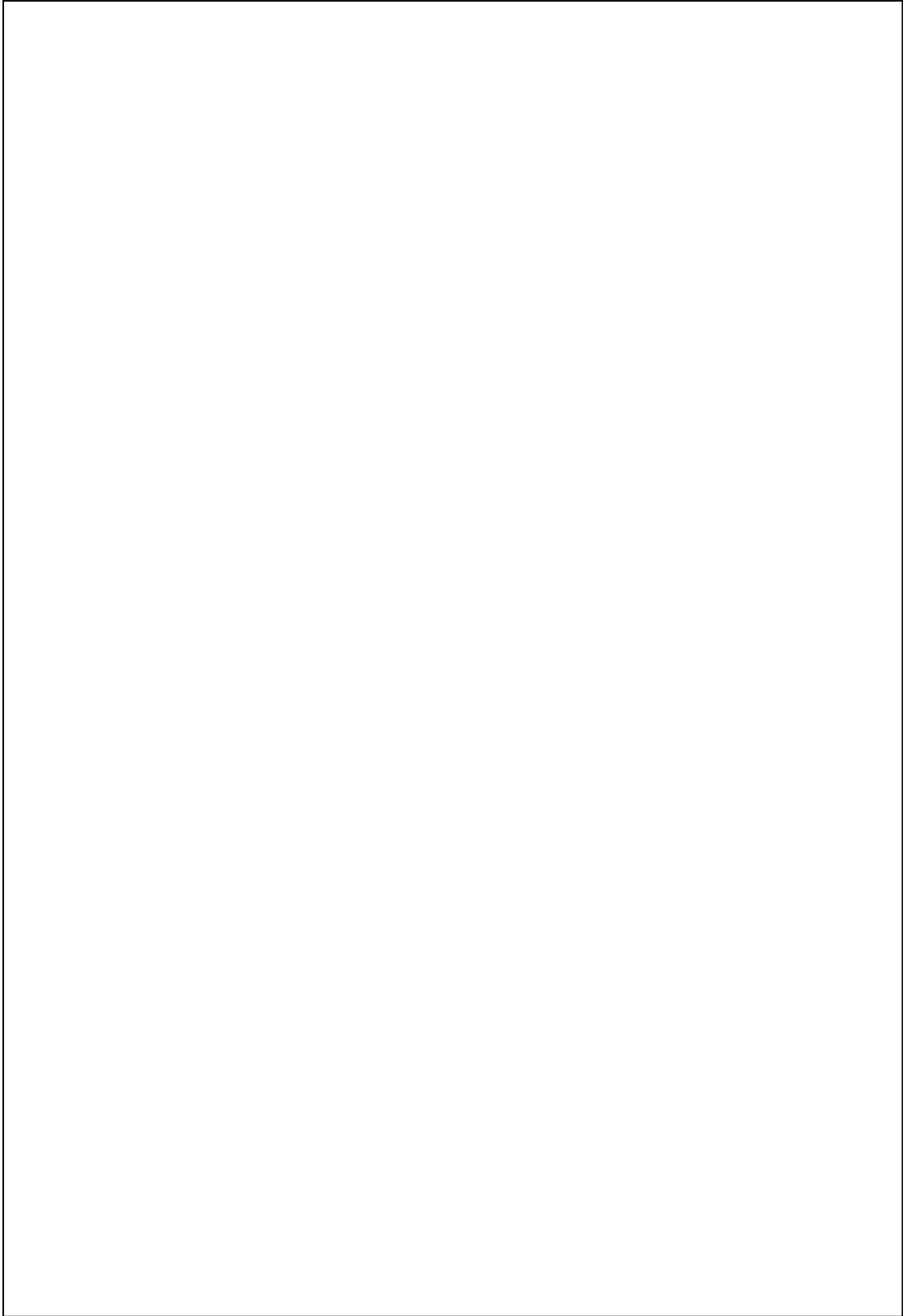
4. Do you consider the draft Plan Strategy to be:

'Sound' (i.e. support)

'Unsound' (i.e. object)

5. If you consider the draft Plan Strategy to be '**SOUND**' and wish to support the draft Plan Strategy, please set out your comments below.





(Continue on a separate sheet if necessary)



6. If you consider the draft Plan Strategy to be '**UNSOUND**' please identify which test(s) of soundness your representation relates to having regard to the Department for Infrastructure's published Development Plan Practice Note 6 'Soundness' (Version 2).

Soundness Tests:

- P1** - Has the DPD¹ been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
- P2** - Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- P3** - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?
- P4** - Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
- 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?
- CE3** - Are there clear mechanisms for implementation and monitoring?
- CE4** - Is it reasonably flexible to enable it to deal with changing circumstances?

¹ Development Plan Document (DPD) – Comprises of the draft Plan Strategy



Details

7. Please give details of why you consider the draft Plan Strategy to be '**UN SOUND**' having regard to the test(s) you have identified above. Please be as concise as possible.

*Please Note: Your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **This representation will be considered during the IE and here will be no further opportunity to submit information unless the Commissioner requests it.***

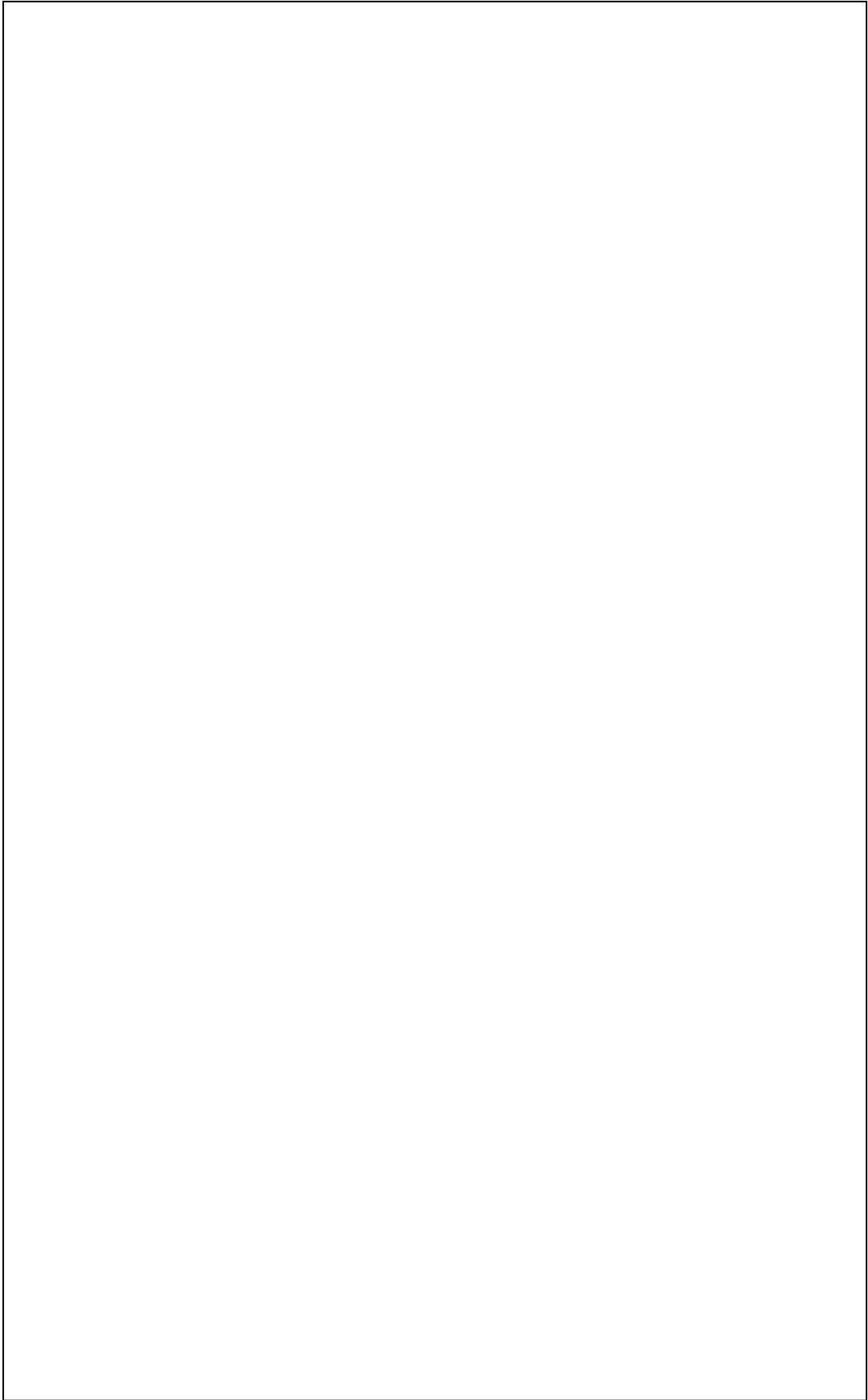
See attached letter-

Northstone largely support the proposals presented within the DPS, however the wording of Policy DM44 is considered to be unsound as it seeks only to safeguard mineral reserves rather than reserves and mineral processing sites.

The quay at Ballyginnif provides an important local and regional economic contribution and the current, lawful landing and processing of mineral at the site should therefore be protected from any development which would prejudice the same. For this reason, the policy is not considered coherent or logical and therefore fails Soundness test CE1.

It is considered that a simple amendment to the wording of the policy to include mineral processing sites as well as mineral reserves would allow the policy to be considered sound.





(Continue on a separate sheet if necessary)



Modifications

8. 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.

See attached letter-

Policy DM44 revised to state:

"DM44.1 The Council will operate a presumption against development proposals within a Mineral Reserve Policy Area that would prejudice the future exploitation of the mineral with the following exceptions:

- a) Proposals for the improvement, extension or replacement of an occupied dwelling within the area that meets other relevant policies of the LDP; or*
- b) Development related to and necessary for an established business within the area where this would not significantly intensify the use of the site and meets other relevant policies of the LDP.*

*DM44.2 Development within 250m of identified reserves **or mineral processing sites** will also be carefully scrutinised to determine whether:*

- a) The operations necessary to recover the mineral or its subsequent processing would be prejudiced by the proposal; and*
- b) The proposal itself may be adversely impacted or suffer nuisance as a result of future mineral exploitation".*

It is considered that the proposed alternative wording would meet the requirements of the Sustainability Appraisal by resulting in an improved economic impact as it would allow for the continued economic contribution that the site makes to the local regional economy and an improved environmental/social impact as it would provide additional measures to avoid nuisance/ impacts upon amenity in the proximity of the mineral processing site.



The accompanying letter also states that to aid the continued economic contribution that the site makes towards the local and regional economy, it is proposed that the 250m safeguarding area around the quay should allow for a presumption in favour of ancillary development associated with the operation of the processing site.

The proposed policy would allow for an improved economic impact as it would allow for the sustainable expansion of the site if required. The proposed policy would likely have a negligible effect upon environmental or social impact as the area would still be the subject of a planning application which would have to demonstrate that the development would not have an unacceptable environmental impact and the development would be required to be ancillary to the use of the quay for mineral processing.

(Continue on a separate sheet if necessary)



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

Please Note: Unless you specifically request an oral hearing, the Commission will proceed on the basis that you are content to your representations considered in written form only. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orally or not.

Please select only one item;

Written Representation

Oral Hearing

Signature:

Date:

Thank you for your response.





File ref: CST/ANBC/DPS/Northstone/Ballyginnif

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E: info@quarryplan.co.uk

Local Development Plan
Planning Section
Antrim and Newtownabbey Borough Council
Mossley Mill
Newtownabbey
BT36 5QA

20th September 2019

Dear Sir/Madam

RE: Antrim and Newtownabbey Local Development Plan 2030- Draft Plan Strategy
Representation on behalf of Northstone (NI) Ltd

Quarryplan Ltd is instructed by its client, Northstone (NI) Ltd ('Northstone') to prepare and submit a representation to the Antrim and Newtownabbey Borough Council (ANBC) Local Development Plan (LDP) Draft Plan Strategy (DPS) which is currently the subject of a public consultation.

As detailed in Quarryplan's representation to the Preferred Options Paper (POP) in December 2017, Northstone operates a quay at Ballyginnif Quay, Loughview Road, Aldergrove. The site is one of the eight established landing/ processing points which are associated with the dredging of sand from Lough Neagh. The extraction of sand from the Lough is the subject of a deemed planning application before the Planning Appeals Commission and a planning application currently under consideration by the Department for Infrastructure (DfI) under the Planning Application references (2015/E0023-28) and LA03/2017/0310/F respectively.

The activities associated with the landing and processing of material and the existing development at the site have been considered under a sequence of historical planning consents and deemed lawful by ANBC as confirmed via a Certificate of Lawfulness of Existing Use or Development (LPA Ref: LA03/2016/0905/LDE) issued in January 2017.

The extraction applications have been accompanied by an Environmental Statement and shadow HRA in support of the planning application. The Environmental Statement considers, amongst many other areas, the socio-economic contribution that sand extraction on Lough Neagh creates, we do not intend to reproduce this information within this submission, however, we have provided an electronic copy of the Environmental Statement and would direct the LDP Plan team to Appendix 12.1 which is a report prepared by Oxford Economics on the Economic Contribution of the Lough Neagh Sand Traders.

Notwithstanding the above, the salient points in relation to the Ballyginnif site are briefly outlined below.

It is important that the site is not considered in isolation as it forms part of the wider operation in terms of Sand and Gravel extraction on Lough Neagh. The site is one of eight landing points dotted around the Lough and is strategically well placed in terms of transporting material from the eastern shore of the Lough to customers located in the east of Northern Ireland.

As demonstrated within the Oxford Economics Report (OER), the Lough Neagh Sand Traders generate clear economic benefits. In 2015 the Lough Neagh Sand Traders supported 346 jobs, associated wages of £9.1 million, GVA of £20.1 million and tax receipts and savings to the public purse of between £4.7 million and £5.7 million. Through supply chain and subsequent consumer spending, all sectors of the NI economy benefit from the operation.

The operations at Ballyginnif generate a number of direct impacts both in terms of the revenue generated by the extraction and processing of sand but also through the direct employment associated with these processes. A number of indirect and induced impacts are also evident as the operator utilises the services of local companies to support existing operations at the site and as direct and indirect employees spend their wages locally.

The existing operations at Ballyginnif are key to delivering these economic benefits not only regionally, but also locally within Antrim and Newtownabbey.

The Sand Traders provide significant benefits for the local economies of Lough Neagh including Antrim and Newtownabbey. As demonstrated in the OER, recent and future growth figures show that the local economies of Lough Neagh face a subdued period of job creation, falling resident employment rates and levels of unemployment above the record lows recorded in 2007. Furthermore, they face the issue of higher levels of long-term unemployed and youth unemployment, suffer from hard to tackle pockets of deprivation and lag below average levels of high skilled residents. In this local context, the benefits arising from Lough Neagh Sand Traders, including the operations at Ballyginnif are significant and positive.

Lough Neagh sand has a significant positive impact on the local market. Feedback from the sector suggests there is unlikely to be sufficient levels of consented, exploitable sand reserves in NI to replace Lough Neagh sand if the resource were lost to supply the construction and manufacturing industry. Ensuring that there is sufficient flexibility within the LDP to allow efficient landing and processing at Ballyginnif will be key to sustaining the local positive impact upon the market. The site is the only landing point within the Council Area and is the sole location for the landing and processing of Lough Neagh Sand within the Borough. Suitably safeguarding the area around the existing landing site to allow for any future possible expansion will also be necessary in terms of providing planning policy support, should the expansion of the site at Ballyginnif be necessary.

Since the recession in 2007, the Antrim and Newtownabbey area has struggled in terms of job growth, not experiencing growth until 2013¹. The operations at Ballyginnif play a vital role in terms of construction related employment. Almost two thirds of those employed in the 234 direct jobs related to sand extraction from the Lough were residents from the three Council areas of Armagh, Banbridge and Craigavon, Mid Ulster and Antrim and Newtownabbey.

In 2016, 6.5% of the employment share in Antrim and Newtownabbey was in construction-related jobs². The OER has also found that up to 5.1 percent of supply chain spending could be on sand or sand related products³. Anything that has an adverse impact on the supply and price of sand available to the sector (e.g. planning policy constraints), will likely have an adverse impact on the local Antrim and Newtownabbey economy, both directly in terms of employment and indirectly in terms of supply chain spending.

The representation made in 2017 demonstrated how the landing site at Ballyginnif is part of the wider Lough Neagh sand extraction process with the benefits associated with the development evident. In order to ensure the continuing long lasting benefits associated with the extraction of sand and gravel, the representation requested that a policy be included within the LDP in relation to the site which would safeguard the surrounding area for future expansion, providing flexibility via policy wording for ancillary development within the site and avoiding any policy restrictions which would unduly restrict the existing operations at the site.

¹ The Economic Contribution of Lough Neagh Sand Traders, Oxford Economics, March 2017 Pg. 50

² Ibid Pg. 35

³ Ibid Pg. 32

The representation recommended the implementation of a safeguarding area in the vicinity of the site at Ballyginnif. The aim of the proposed policy would be to prohibit development within close vicinity of the site which would be sensitive to the operations at the Quay. We proposed a buffer of 200m from the access to the site, within which development that would have the potential to be adversely affected by the operations at the Quay (for example residential development) should be prohibited.

Draft Policy DM44 of the DPS relates to Mineral Reserve Policy Areas and states that:

“DM44.1 The Council will operate a presumption against development proposals within a Mineral Reserve Policy Area that would prejudice the future exploitation of the mineral with the following exceptions:

- a) Proposals for the improvement, extension or replacement of an occupied dwelling within the area that meets other relevant policies of the LDP; or*
- b) Development related to and necessary for an established business within the area where this would not significantly intensify the use of the site and meets other relevant policies of the LDP.*

DM44.2 Development within 250m of identified reserves will also be carefully scrutinised to determine whether:

- a) The operations necessary to recover the mineral or its subsequent processing would be prejudiced by the proposal; and*
- b) The proposal itself may be adversely impacted or suffer nuisance as a result of future mineral exploitation”.*

It is considered that the wording of this policy should be extended to include the quay at Ballyginnif. The wording presented requires the criteria stated at DM44.2 to be applied to developments within 250m of *identified reserves*. Given the nature of the operations at the quay, the proposed wording wouldn't be explicitly applicable as the reserve is located within a specified extraction area within Lough Neagh, c. 3 km to the east of Ballyronan. The mineral is however landed and worked at the Ballyginnif site and therefore given the importance that the mineral has to the local and regional economy, operations at the quay should be allowed to continue without being prejudiced by nearby proposals or proposals that would suffer nuisance as a result of the already existing and lawful operations at the site.

In its current form the policy is not considered to comply with Soundness Test CE1 as set out in the Department's Development Plan Practice Note 6 (May 2017) as the policy does not form a coherent strategy from which the policy logically flows. There is no evidence as to why the policy should only be applicable to identified reserves as opposed to reserves and mineral processing sites. Due to their nature, operations and mineral processing sites have the potential to impact upon the amenity of nearby whether located at a Mineral Reserve or separately and therefore it is our view that the [policy should reflect the same.

The Council is aware via the previous representation that the site is used only for the landing and processing of mineral extracted from Lough Neagh. The economic benefits associated with the same have been outlined in the previous representation. Furthermore, the potential issue surrounding the existing operations affecting the amenity of developments if they were to be developed within close proximity of the site was also raised in the previous representation.

Given that the first criterion of draft Policy DM44.2 references the processing of mineral there is an implicit reference to the impacts that mineral processing may have upon the amenity of new forms of development within close proximity to mineral workings. The manner in which the policy is worded avoids explicit consideration for processing sites, where no reserve is present and therefore could negate the need for the policy to be applied where no reserve is present.

It is recommended that this issue could be solved and policy made sound via a simple amendment to the wording to state that:

“Development within 250m of identified reserves or mineral processing sites will also be carefully scrutinised to determine whether...”

By amending the policy wording to include mineral processing sites, the 250m buffer will allow the operator at Ballyginnif Quay to carry out activities required in association with the site whilst maintaining a suitable buffer with proposed developments which would have the potential to prejudice operations at the site and also avoids the potential for the amenity to be adversely affected for any proposals within the vicinity of the quay. To avoid any future ambiguity, it is suggested that the 250m buffer be explicitly shown within the LDP Proposals Map. The safeguarding area would ensure that appropriate standards of amenity can be maintained in the around the Quay whilst allowing the site to meet its operational needs and continue to deliver the economic benefits described earlier in this letter.

Furthermore, in order to aid the continued economic contribution that the site makes towards the local and regional economy as described above and as recommended in the previous response to the POP, it is proposed that the 250m safeguarding area around the quay should allow for a presumption in favour of ancillary development associated with the operation of the processing site. Examples of such uses would be the storage of machinery, stockpiling of sand or staff car parking, should it be required in future. By protecting this area, it would allow the operations at the Quay to adapt to future requirements in a sustainable manner over the plan period, allowing for the development of any required infrastructure related to the permitted operations, if required. Such a policy would avoid the need to locate facilities elsewhere and the associated impacts in terms of increased time, cost and traffic movements.

Conclusion

Quarryplan Ltd is instructed by Northstone to prepare and submit a representation to the ANBC LDP DPS which is currently the subject of a public consultation. A representation was also made during the POP consultation in December 2017. Northstone operates a quay at Ballyginnif Quay, Loughview Road, Aldergrove.

Northstone largely support the proposals presented within the DPS, however the wording of Policy DM44 is considered to be unsound as it seeks only to safeguard mineral reserves rather than reserves and mineral processing sites.

The quay at Ballyginnif provides an important local and regional economic contribution and the current, lawful landing and processing of mineral at the site should therefore be protected from any development which would prejudice the same. For this reason the policy is not considered coherent or logical and therefore fails Soundness test CE1.

It is considered that a simple amendment to the wording of the policy to include mineral processing sites as well as mineral reserves would allow the policy to be considered sound. The representation also considers that there should be a presumption in favour of development which would be ancillary to the existing workings at the quay, thereby aiding the continued economic contribution that the site makes towards the local and regional economy.

We would welcome any feedback the Council may have with relation to this submission and would be grateful if the Council could continue to update us on the progress of the LDP.

If you have any queries please do not hesitate to contact us using the details provided above.

Yours faithfully,



Chris Tinsley MRTPI
Senior Town Planning Consultant
On behalf of Quarryplan Ltd