

Submission in respect of the Antrim and Newtownabbey Borough Council Local Development Plan 2030: Draft Plan Strategy statutory consultation process

Whilst I welcome the identification of Belfast International Airport as a Strategic Employment location, I feel that it is important that the Antrim and Newtownabbey, Local Development Plan 2030: Plan Strategy (hereinafter referred to as the Plan Strategy) recognises that not only should there be policies in place for the airport itself, but there should also be policies for infrastructure that would support the airport's operation and growth. Infrastructure supporting an airport's operation and growth include a wide range of developments and land uses, such as commercial/business parks, warehousing, distribution and logistics facilities, energy centres, education centres, office space and hotels.

It is important that the Plan Strategy acknowledges that airports are not standalone entities, which has historically been the case with Belfast International Airport, but that they are regional and national economic accelerators, catalysing and driving business development. As aviation-oriented businesses increasingly choose to locate at airports and along transportation corridors radiating from them, an 'aerotropolis' emerges; hubs are being built around airports which nurture strategic employment locations. As a consequence, aviation involves the delivery - directly and indirectly - of many different forms of development and land uses. There is an important relationship between the 'airport', the sub-region, the country and the global economy which is underpinned by connecting the airport to local economic needs and wider opportunities for growth and employment. In this context it is important that the future is not constrained by slavishly adhering to the *Airport Masterplan 2030, [in Plan Strategy ... highlighted pg 78 para SP 2.8] which has effectively limited the potential of the gateway to the country to the confines of land owned, and off which they can gain control by the airport, thereby creating a monopoly situation which enables a single company to hold those wishing to avail of opportunities to ransom. As presented, the content of the Plan Strategy is too prescriptive and presumes in favour of Belfast International Airport Limited. Moving forward, if the sub-region is not only to be a sustainable but also a successful strategic employment location I feel that the Plan Strategy needs to recognise that the airport and its hinterland are inextricably linked. To exclusively serve the wants and demands of the airport would be fundamentally and fatally flawed.

Whilst the Plan Strategy is not a zoning plan, it provides the platform for the zoning process and in this context, abundant opportunities exist for additional strategic employment locations which not only knit succinctly with the boundary of the airport but also can accommodate infrastructure requirements, facilitate road improvements at British Road and be further enhanced by the realignment of Antrim Road, [Airport Masterplan 2030 fig 10]. All approach vehicles to the airport area will then ultimately have commercial development on both sides or, if approaching from the west, will have commercial development on the right and a backdrop of commercial development straight ahead.

There is therefore abundant scope to maximise the utility of the sub-region by accommodating employment growth and economic investment. As presented, the wording of the draft Plan Strategy is too prescriptive and weighted heavily in favour of Belfast International Airport Limited and to adopt it in its current form would be fundamentally and fatally flawed as it would not only undermine the principles of justice and fairness which underpin the planning system but also the legitimacy of the Plan Strategy.

I hope these comments are helpful, both the recommendations to give Appropriate Weighting to the Airport Master Plan 2030, and to widen the scope of the policy considerations set out in the Plan Strategy are taken into account.

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