

ANTRIM & NEWTOWNABBEY LOCAL DEVELOPMENT PLAN 2030

Draft Plan Strategy Response

**Antrim Business Park,
Antrim**

Errigal Contracts

September 2019



Contents

1.0	Introduction	2
2.0	Draft Plan Strategy	3
3.0	Antrim Business Park Proposals	5
4.0	Conclusions	7

Annexes

Annex 1 – Site Location Map

Annex 2 – Proposed Concept Masterplan of Antrim Business Park

1.0 Introduction

- 1.1 We write to the Council on behalf of our client **Errigal Contracts** in respect of the recently published Draft Plan Strategy (DPS) and as part of the wider Local Development Plan (LDP) 2030 process, regarding their lands at Antrim Business Park (ABP), Randalstown Road, Antrim (see **Annex 1**). ABP is comprised of employment lands not currently zoned within the existing development limit and a portion of lands currently outside the settlement development limit of Antrim.
- 1.2 The lands are strategically located c. 1.8 miles from the M2 and M22, a transport corridor with 65,000 vehicles passing daily, providing transport linkages south-east to Belfast and westwards as well as the A26 northwards towards Ballymena. Our client sees the potential of the Antrim and Newtownabbey Borough, particularly the Main Hub of Antrim, having invested heavily through the purchase of Antrim Business Park (ABP) in 2019. The site neighbours Kilbegs Business park to the north and The Junction + Asda Superstore to the east. Residential development at 'Castlewater' access from Randalstown Road to the south is ongoing. The entire land holding contains three distinct parcels of land (see **Annex 2**) and shall be referred to as below within this representation:
 - 1.2.1 Site I: Existing Industry – Antrim Business Park (7.8Ha);
 - 1.2.2 Site II: Proposed Industrial/Employment Lands (15.6Ha); and
 - 1.2.3 Site III: Proposed Residential/Mixed-Use Lands (3.4Ha).
- 1.3 We write to the Council to make representation on behalf of our client's lands with regard to the following three points:
 - 1.3.1 The current development limit curtailing ABP is incongruously restrictive and should be revised to allow future growth/development of the lands;
 - 1.3.2 To make the Council aware at this stage of the lands potential to successfully yield a mixed-use (including residential) development; and
 - 1.3.3 To identify that ABP contains viable employment/industrial lands, both proposed which benefit from planning history in favour of industrial development, and existing with major employers and job providers. Both must be promoted and safeguarded to allow future expansion.
- 1.4 We do however note and welcome that the precise boundaries of employment/residential zonings and the wider development limit will be a matter brought forward in the Local Policies Plan (LPP). However, to ensure there are improved job opportunities and housing availability of a sustainable and high quality, we respectfully request the Council give due regard to our clients lands. We respectfully request that this submission, in respect of the housing policies, will be given due cognisance throughout the plan preparation period and dealt with by oral hearing.

2.0 Draft Plan Strategy

- 2.1 We concur with the Spatial Growth Strategy for the Borough as it focuses growth towards both Metropolitan Newtownabbey and the Major Hub Town of Antrim, seeking to *"strengthen their roles as the primary locations for future housing and economic growth and investment within our Borough"* (pg. 65). Errigal Contracts welcomes the continued emphasis within the DPS of Antrim playing both a local and regionally significant role, focusing development efforts sustainably towards the Main Hubs first in line with the RDS.
- 2.2 We are of the opinion that this housing allocation is an under estimation from what will be required for the plan period in Antrim evidenced by preceding years build rates. The current housing growth figure of 9,750 dwellings is too restrictive when considering the LDP timetable and any potential change in circumstances prior to the adoption of the Local Policies Plan. Given that the publication of the Draft Plan Strategy and consultation period is currently 6 to 9 months behind schedule, we feel it is reasonable to anticipate that the full adoption of the Plan will be delayed past the March 2024 timeframe. This could result in less than 5 years between the adoption of the Plan and the end of the Plan period.
- 2.3 The growth allocation figures for the Borough have been identified as 9,750no. homes for the plan period of 2015-2030. Of this allocation, 2,750no. dwellings (28.2%) have been allocated for Antrim. Given these delays, and therefore the limited time for review and amendment of the Plan prior to 2030, we believe it would be appropriate to include a housing growth figure to 2032 to allow for adequate flexibility and time to review in the event of a newly amended timetable. A revised figure of 11,050no. homes has been projected forward to 2032 to ensure there is a 5 year land supply, with the Antrim allocation of 28.2% remaining which equates to 3,116no. units.
- 2.4 Turning to employment lands, Antrim has a limited supply of c. 12Ha remaining employment lands dispersed within existing employment lands. This includes Antrim Map Refs 2, 3 & 14 from the Evidence Paper 3 – Economic Growth ELER: 2 – Lands located southwest to the rear of The Junction (2.03Ha); 3 – Lands to the southwest of Funky Moneys The Junction (0.45Ha); and 14 – Former Enkalon Sports and Social Centre (2.61Ha). This 5.09Ha of land monitored within the report exists at ABP. Errigal Contracts intend to bring these lands forward and welcome the Council approach of encouraging sustainable expansion of employment lands.
- 2.5 **Paragraph 2.37** of the DPS highlights the significance the Borough plays regionally, with population growth to 2030 expected to reach 146,003 from the current 141,697 (a c. 4,300 person increase). With 32.3% of employment located in Antrim, it is recognised that the newly emerging LDP with need to respond to growth through adequate supply of housing and employment opportunities.
- 2.6 Of the 14 Strategic Objectives, those listed below have the full support of Errigal Contracts as they seek to promote economic opportunity and high quality residential lands at ABP:

- 2.6.1 **Strategic Objective 2:** Establish the Borough as a premier business location where both existing and new, innovative, cultural and creative enterprise can prosper;
- 2.6.2 **Strategic Objective 3:** Provide a range and quality of land and premises to facilitate business growth, promote economic diversification and protect our strategically important employment locations;
- 2.6.3 **Strategic Objective 4:** Promote development and regeneration of our town centres and commercial areas;
- 2.7 When looking at the legacy plan for Antrim, following adoption of the Antrim Area Plan in 1989 an alteration was published in 1999 relating to Industrial lands. This took into consideration the development at Kilbegs Road and east of Plaskets Burn, a portion of lands (see **TSA 1** below) now known as Kilbegs Business Park.
- 2.8 The revision was mindful of ongoing development at Kilbegs Road and sought to regularise this through inclusion of the lands within the development limit for industrial use (c. 14.51Ha). Following this alteration, a significant portion of lands within ABP was left outwith the development limit (identified at **TSA 1** below). Given the location of Kilbegs to the north and ABP to the south of this wedge, the juxtaposition between these two areas of established industrial land has stymied the growth prospects of ABP northwards.



TSA 1 – Antrim Area Plan 1989 (left) & Alteration 1999

- 2.9 The irregular shape of the development limit is not conducive to promoting and enabling the previously highlighted vision of the Borough aligned with the RDS to, *"ensure an adequate and available supply of land"*. The current development limit prejudices this aspiration along with the viable development opportunities of ABP for expansion, as the development limit currently dictates, any growth would be outwith the development limit. We respectfully request the limit is rationalised and the lands considered for inclusion at the Local Plan Policies stage.

Strategic Policy 2: Employment

- 2.10 The positive promotion of the Borough for employment related uses is reinforced at **Paragraph 5.4 + 5.5**, in that it is committed to, *"promoting a vibrant economy, assisting existing employers, attracting new firms and supporting business start-ups"*. The recent sign up to the Belfast City Deal will enable the creation of new jobs and stimulate economic growth within the Borough. Errigal Contracts are extremely supportive of the Borough strategy and

wish to ensure, as a major employment land owner with substantial job-creating tenants, ABP will be considered and protected to help yield this projected economic demand.

- 2.11 **Policy SP 2.3** sets out the Council's 'two-tier' approach to identifying industrial/employment lands within the Borough. These are: a) Strategic Employment Locations (SELs); and b) Local Employment Sites (LESs). Given that ABP is not proposed as a SEL and would not qualify due to the overall size (<10Ha.), it will qualify as a Tier 2 LES. **Policy 2.9** states the Council position on these LES, in that it will, *"identify other established industrial business area...as Local Employment Sites. The location and precise boundaries of these site will be brought forward in the Local Policies Plan"*.
- 2.12 Errigal Contracts are supportive of this policy and would request that ABP is classed amongst these established LES, due to hosting significant international businesses such as Sports Direct and Fastway Couriers. **Policy SP 2.10** identifies that these sites will be safeguarded for employment needs, however there is recognition that alternative 'mixed-use' redevelopment schemes capable of delivering local community and employment benefits will be considered.

Strategic Policy 4: Homes

SP 4.3 – The allocation of housing growth to each settlement and the countryside, is based on the Spatial Growth Strategy for the Borough...

Test: P1 – Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?

- 2.13 While we agree with the 28.2% allocation and evidence base for development of new housing in Antrim, this total figure must be updated in line with the revised total housing growth figure previously stated. For 11,050no. units, this would increase to 3,116no. units for the revised period to 2032. Table 12 of 'Evidence Paper 6 – Housing' indicates the total number of committed residential units is 3,233no. However this is inclusive of uncommitted zonings which may not be available or achievable, particularly if they have been zoned for a long period of time. The evidence to support this has not sufficiently reviewed the remaining yield within each settlement.
- 2.14 In order to provide a choice of housing for people in socially balanced and inclusive communities across the Borough, the Council will apply a presumption in favour of the development of new homes provided applications meet the requirements of **Policy SP 4** and other relevant policies and provisions of the LDP.

3.0 Antrim Business Park Proposal

- 3.1 Included at **Annex 2** is a proposal which identifies the vision for ABP, within three distinct zones defined as: Site I – Existing Industry (Green Hatching); Site II – Proposed Industry (Yellow Hatching); and Site III – Proposed Mixed-Use. Aware that the zoning of land and

defining boundaries is reserved until the LPP stage, we wish to make Council aware of our clients intent to ensure the longevity of ABP and secure a successful future to the LES.

'Site I' – Existing Industry

- 3.2 This portion of ABP extends to 7.8Ha and hosts several major employment/industrial/storage and distribution tenants as previously listed and detailed on the concept plan. The site has direct access onto Enkalon/Randalstown Road and benefits from a private service yard to the rear. It is requested that the Council act in the interest of the existing industrial tenants to protect and safeguard their use.

'Site II' – Proposed Industry

- 3.3 The lands proposed to accommodate industrial/economic uses extend to 15.6Ha and are to the western boundary of ABP, extending beyond the current development limit to abut Kilbegs Business Park. The lands are of relatively flat topography, again with frontage onto the Enkalon/Randalstown Road. These can be clearly identified as a natural rounding off opportunity to regularise the development limit. To ensure the portion of lands outwith the development limit does not remain undeveloped and land locked, it is requested that the Council will look favourably upon its inclusion within the proposed development limit at the appropriate stage.
- 3.4 Site II benefits from a positive planning history establishing the lands for industry/employment. Application Ref: T/2006/0676/F granted full planning permission for the construction of a 35no. unit light industrial warehousing development with associated ancillary office accommodation. Application Ref: T/2010/0523/F varied conditions regarding floorspace restrictions, to permit trade counters to a maximum of 15% of floorspace/5no. units with a maximum floorspace of 25% for showroom/sale and display of goods.

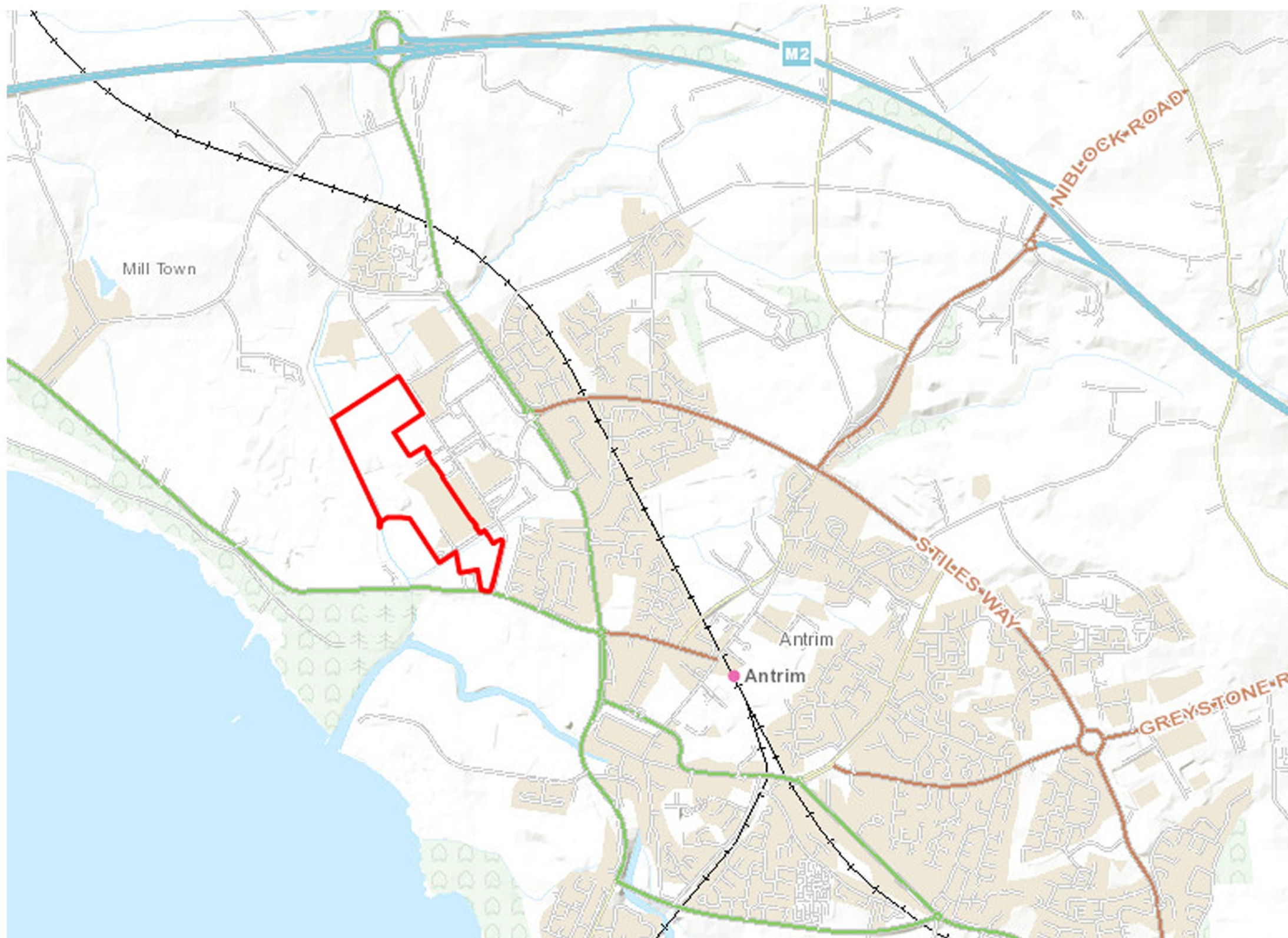
'Site III' – Proposed Mixed Use

- 3.5 To the east of ABP, on lands of the former Enkalon Sports and Social Centre and also adjacent to the existing industry, exists 3.4Ha with potential to comprehensively develop a sensitively designed mixed-use proposal in line with **Policy SP 2.10**. These lands are significantly underutilised, currently laid out as a surface level car park along with a car wash facility. Adjacent to the west of these lands at Randalstown Road is the currently under construction residential development of 'Castlewater' (Refs: LA03/2017/0908/F & LA03/2018/0629/F).
- 3.6 Given the adjacent context of Site III lands and frontage relationship with Randalstown Road, it is proposed that this portion of ABP is capable of yielding a mixed use scheme comprising a business park and residential dwellings, acting as a natural buffer to integrate with the surrounding land uses.

4.0 Conclusion

- 4.1 The DPS forms a key part of the overall LDP process, providing a policy framework to guide development and encourage investment throughout the defined plan period. The DPS will positively assist with the formation of the Local Policies Plan, the next key stage of the LDP 2030 process which will focus on site specifics/boundaries.
- 4.2 We are of the opinion that our clients lands at Antrim Business Park represent a clear Local Employment Site, as it provides an important employment location to the Borough as well as containing the highlighted brownfield lands. These are vacant and currently underused in the wider context. Designation and protection of the lands as a LES would enable the client to implement comprehensive redevelopment proposals to create further employment and yield much more productive and sustainable uses. To ensure that future development is not hindered, it is crucial that the development limit which currently bounds ABP is rationalised so as to not prejudice future growth.
- 4.3 This representation sets out the views of **Errigal Contracts** in respect of the policies contained within the Draft Plan Strategy. Accordingly, we request that these comments are given favourable consideration by the Council in relation to the adoption of the Plan Strategy. Aware that site specific representation will generally be reserved until the Local Policies Plan, we respectfully reserve the right to make further representations throughout the course of the LDP 2030 process.

Annex 1 – Site Location Map



**Annex 2 – Proposed Concept Masterplan of
Antrim Business Park**

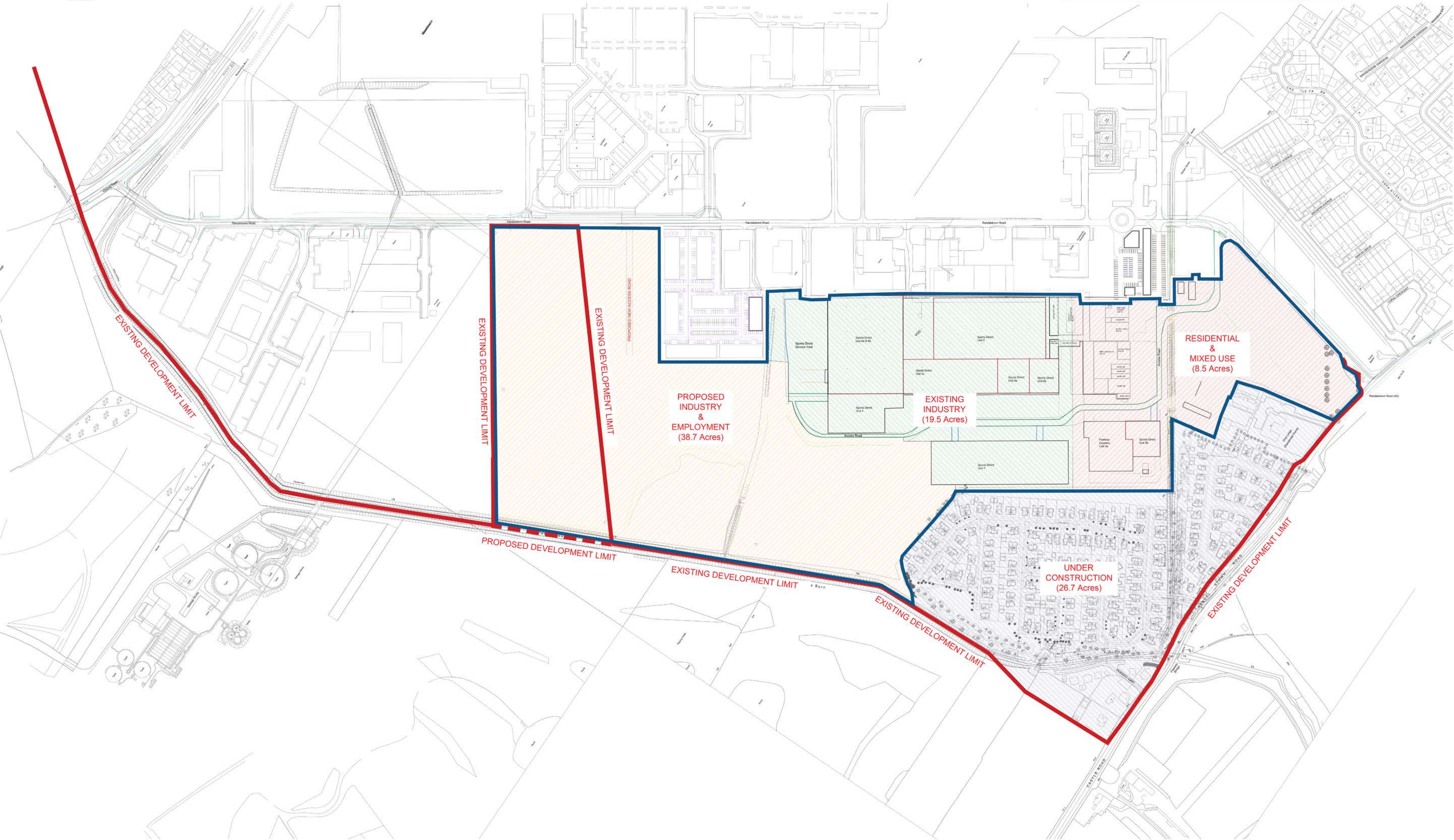
- PROPOSED DEVELOPMENT LIMIT
- EXISTING DEVELOPMENT LIMIT
- OWNERSHIP BOUNDARY
- PROPOSED INDUSTRY & EMPLOYMENT
- EXISTING INDUSTRY
- RESIDENTIAL & MIXED USE
- UNDER CONSTRUCTION

INDUSTRIAL UNIT TENANT LIST

UNIT 4	SPORTS DIRECT	UNIT 5c	SPORTS DIRECT
UNIT 5	SPORTS DIRECT	UNIT 6a&b	SPORTS DIRECT
UNIT 5a	SPORTS DIRECT	UNIT 7	SPORTS DIRECT
UNIT 5b	SPORTS DIRECT		

GENERAL NOTES:
All dimensions in millimeters unless noted otherwise
Use figured dimensions only. DO NOT SCALE.
Any discrepancies found on site to be reported to Errigal Group immediately.
Any discrepancies found on drawings to be reported to Errigal Group immediately.
This drawing must be read in conjunction with all other relevant drawings and specifications

LOCATION PLAN



A	19/09/2019	information added	ST
REV.	DATE	AMENDMENT	BY
Consultant			



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Project

Antrim Retail Park

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Development GA

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