

Submitted to Local Development Plan 2030 - Draft Plan Strategy Representations

Submitted on 2019-09-15 19:08:09

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:

I am an Agent

Please specify your contact details:

Title:

Mrs

First name:

Carrie

Last name:

McDonagh

Job Title (where relevant):

Managing Director

Organisation Name (where relevant):

One2One Planning

Agent Name (If applicable):

Client Name (If applicable):

Mae Murray Foundation

Address:

1 Larkfield Avenue
Upper Lisburn Road
Belfast

Postcode (please enter your full postcode):

BT10 0LY

Telephone number:

07920 583648

What is your email address?

Email:

carrie@one2one-planning.co.uk

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:

Community Facilities

Strategic Policy (SP) Paragraph Number:

SP 5

Detailed Management Policy (DM) Paragraph Number:

DM 24.2

Page Number In Document:

178

Proposal Map (If relevant state location):

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

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:

Mae Murray had made a submission at POP seeking enhanced references in the plan documents to improved accessibility for disabled users and an acknowledgement that not all community provision is provided by the statutory authorities given the role of the voluntary sector in disabled services in particular.

They welcome the references in SP 5 to the role of the community and voluntary sector in service provision which notes that 'the Council, when working with its partners including the community and voluntary sector will seek to ensure that all communities in the Borough have access to health, education, community and recreational facilities as well as parks and other open spaces that meet the needs of the communities they serve'.

Community facilities in the countryside have to comply with Policy DM 24.3 (Page 178) . This currently states 'The Council will sympathetically view proposals for new community buildings and facilities, including outdoor recreational activities and play facilities at accessible locations in the countryside, where it is demonstrated these are necessary to serve the local rural population.

This introduces an effective need test for the local rural population however many community facilities have to facilitate clients or potential users in more than the local rural area and may extend to the wider council area if a larger proposal. While the majority of more intense users would normally be directed to settlements the policy does not include any flexibility for community schemes that due to their nature or scale have to be delivered in the rural area but are not specific to the local rural population. An example is the planned Inclusion zone for Mae Murray Foundation.

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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:

At para 8.10 it states that the Council will complement future provision by providing a flexible policy approach to considering policy proposals which seek to address an unforeseen demand for new community facilities.

This planned flexibility is the correct approach as much provision depends on funding and potential grant or charity funding but it hasn't pulled through into the policy and additional flexibility is required to wording of DM 24.3. It is suggested that the wording should change from 'The Council will sympathetically view proposals for new community buildings and facilities, including outdoor recreational activities and play facilities at accessible locations in the countryside, where it is demonstrated these are necessary to serve the local rural population' to 'are necessary to benefit the diverse needs of the residents of the borough'.

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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?

No