

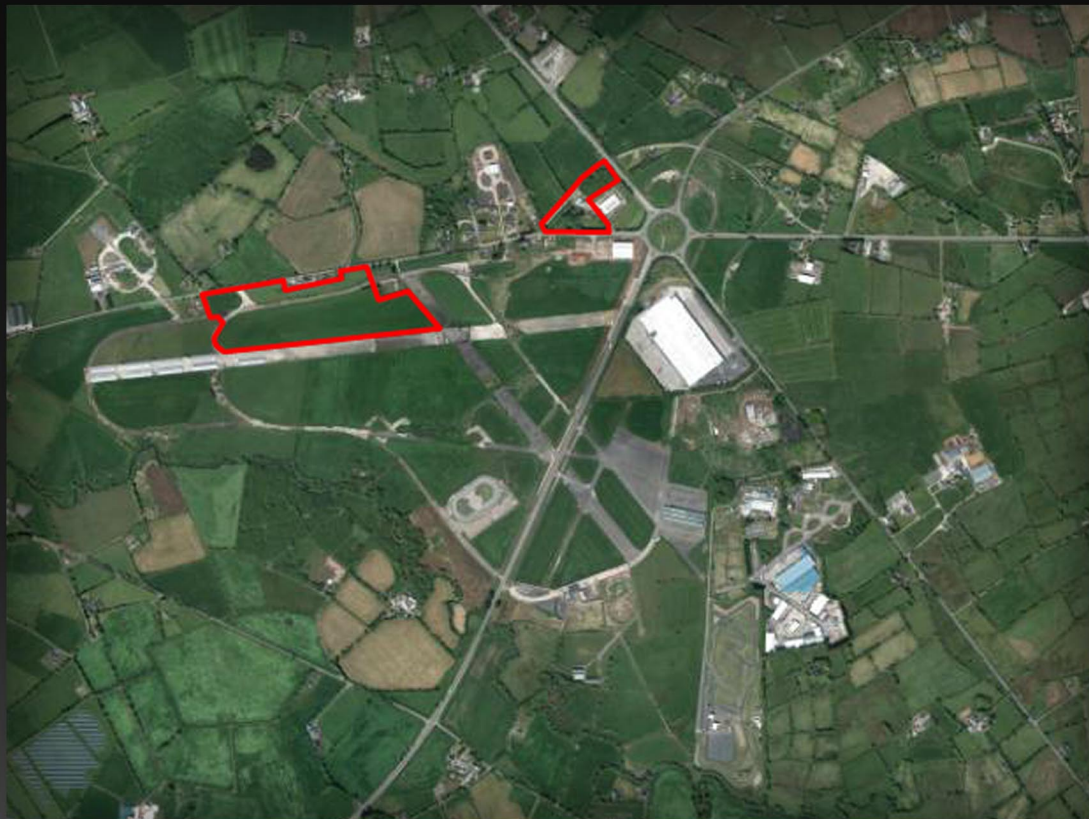
# **ANTRIM & NEWTOWNABBEY LOCAL DEVELOPMENT PLAN 2030**

## **Draft Plan Strategy Response**

**Nutts Corner,  
Crumlin**

**Mr. Michael Erwin**

**September 2019**



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## 1.0 Introduction

- 1.1 We write to the Council on behalf of our client, **Mr. Michael Erwin**, in respect of the recently published Draft Plan Strategy (DPS) and as part of the wider Local Development Plan (LDP) 2030 process. This representation follows on from the initial representation submitted to the Council as part of the Preferred Options Paper, submitted in April 2017 (Council Ref: POP/PR/081). The Local Development Plan process is of critical importance to ensure expected growth and expansion of employment throughout the Borough, so this can be accommodated and delivered in the most sustainable and efficient manner following adoption of the new LDP.
- 1.2 The DPS notes that the Borough of Antrim & Newtownabbey occupies a strategic location within Northern Ireland, something we would concur with and suggest is amplified by the positioning of Nutts Corner both in the Borough and Country wide contexts. The subject lands are located at Nutts Corner Road, adjacent to the A26 Nutts Corner Roundabout and near the former airfield (see **Annex 1**). Extensive planning history at Nutts Corner has established a strong employment/economic precedent at this location, with c. 90Ha of lands developed for these related uses. Mr. Erwin is the owner of Erwin Agri-Care, specifically mentioned within Evidence Paper 3 – Economic Growth, established for over 50 years and operating a c. 2,000m<sup>2</sup> showroom and service workshop from Nutts Corner c. 5.1 miles from Belfast International Airport (BIA).
- 1.3 The Spatial Growth Strategy recognises the economic importance of Nutts Corner as a strategic location for employment both within Antrim & Newtownabbey Borough and Northern Ireland, located on the Regional Strategic Transport Network. This has been demonstrated through the successful expansion of Mr. Erwin's business and other large-scale employers (Lidl HQ) at Nutts Corner. Our representation on behalf of Mr. Erwin support all policies within the DPS relating to the promotion of Nutts Corner as a SEL. However, we note Policy DM1.1 suggests restricting the scope of acceptable uses within the Nutts Corner SEL and, as set out in this representation, we believe this element to be Unsound.
- 1.4 We respectfully request that this submission will be given due cognisance throughout the plan preparation period and dealt with by oral hearing.

## 2.0 Draft Plan Strategy

- 2.1 Nutts Corner is subject to several policies proposed within the DPS, with commentary regarding these set out below. To summarise, except for DM1.1 which seeks to restrict the scope of uses within the Nutts Corner SEL, we are generally in support of the Employment Strategy and all policies pertaining to designation of Strategic Employment Locations (SELs) and Local Employment Sites (LESs).
- 2.2 The Spatial Growth Strategy sets out at Criterion (f) Strengthen the role of Belfast International Airport as a Regional Gateway and recognise the importance of Nutts Corner as a strategic location for employment on the Regional Strategic Transport Network.
- 2.3 There are also Five Strategic Objectives are outlined within the 'Employment' section of the DPS, highlighting the Council's commitment to enhanced prosperity throughout the Borough. This aims to facilitate continued employment growth and meet the needs of the Borough in a sustainable manner. Mr. Erwin is supportive of this outlook and welcomes the approach of establishing Antrim & Newtownabbey as a premier business location. Of these five Strategic Objectives outlined, the following are of importance and relevance: -
- *Objective 1:* Promote sustainable growth by managing development and securing new infrastructure provision in our settlements & countryside to meet the needs of all our citizens.
  - *Objective 2:* Establish Antrim & Newtownabbey as a premier business location where both existing and new, innovative, cultural and creative enterprise can prosper.
  - *Objective 3:* Provide a range and quality of land and premises to facilitate business growth, promote economic diversification and protect our strategically important locations.

### Strategic Policy 2: Employment

- 2.4 **Policies SP 2.1+2.2** set out ambitious growth figures of 9,000no. jobs created by 2030, with a presumption in favour of employment related development. This proposed job creation is to be on lands both newly identified, and sites safeguarded from legacy plans. Mr. Erwin welcomes the highlighting of Nutts Corner and its overall designation as a SEL within the DPS, fully supporting this approach. We are cognisant that the boundaries associated with these SELs will be dictated at a later stage of the

LDP, however, wish to make the Council aware of Mr. Erwin's lands which have significant potential to yield employment related uses. These are viable and appropriate for inclusion within the Nutts Corner SEL.

- 2.5 **Policy SP2.3** provides further amplification to the definition of SELs and advises that *"the Council will operate a 'Two-Tier' approach to the identification of land and premises for industrial/employment activity and its subsequent retention and protection from alternative use based on:- A) Strategic Employment Locations (SELs); and B) Local Employment Sites (LESSs)".*
- 2.6 The focus of employment lands towards these two tiers is welcomed and supported, with emphasis first placed towards the SELs. We offer full support for these policies including this tiered approach and agree that these seek to facilitate the sustainable future development of employment locations lands within the Borough. Nutts Corner, and specifically those lands with Mr. Erwin's ownership, can ensure the Strategic Outcomes are met.
- 2.7 **Policy SP 2.5** highlights several existing SELs, quantified as being 10 hectares or greater in size. Again, we agree with the designation and support the Council recognition of this location as an important economic/employment location. We maintain our position from initial representation at the POP stage that Mr. Erwin's lands represent a significant opportunity for the Borough to capitalise on the stated outcomes of identifying lands to facilitate economic growth.

### **Strategic Employment Locations**

- 2.8 Within Evidence Paper 3 – Economic Growth, the ELER sets out that Storage & Distribution is the employment sector with the greatest demand. When considering these employment space demands (prepared by Webb Advisory), speculation estimates that the land requirement for employment uses will be between 76,000m<sup>2</sup>-318,000m<sup>2</sup> (7.6Ha-31.8Ha) by 2030. Nutts Corner is proposed for designated as a SEL and we would fully support this Policy. As eluded to within the introduction, Nutts Corner benefits from strategic transport linkages which many large-scale employers have now recognised. This showcases a significant degree of confidence in Nutts Corner and its ability to operate as a SEL. To ensure this position is protected and encouraged, available lands for sustainable expansion must be considered. Although aware that site specific representation will generally be reserved until the Local Policies Plan, we are of the opinion the Mr. Erwin's lands possess the natural qualities

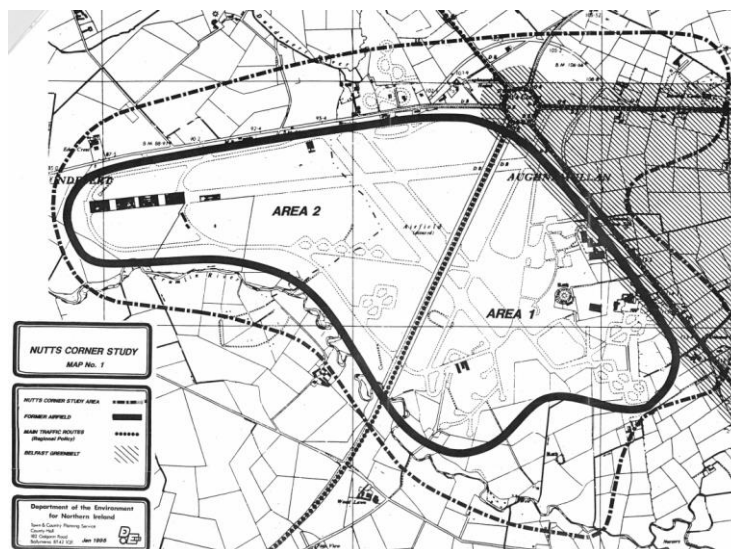
for inclusion and would respectfully request cognisance of this at such an appropriate time.

- 2.9 **Table 3** of the DPS identifies all existing SELs, with Nutts Corner and BIA identified as the two SEL locations as 'Other'.

|                                  |   |
|----------------------------------|---|
| <b>Metropolitan Newtownabbey</b> | Global Point<br>Monkstown Industrial Estate<br>Church Road<br>Mallusk<br>South of Antrim Road (Mallusk)<br>North of Antrim Road (Mallusk)   |
| <b>Antrim</b>                    | Rathenraw Industrial Estate<br>Newpark Industrial estate<br>Antrim Technology Park<br>Steeple Industrial Estate<br>Randox Science Park<br>Enkalon Industrial Estate<br>Kilbegs Road<br>Springfarm Industrial Estate |
| <b>Ballyclare</b>                | Dennison Industrial Estate/<br>Avondale Business Park<br>Hillhead Road  |
| <b>Other Locations</b>           | Belfast International Airport<br>Nutts Corner   |

Table 3: Existing Strategic Employment Locations

- 2.10 The previously identified boundaries within the DoE Nutts Corner Study (Map No. 1) placed an indicative limit around the former airfield, along with also denoting the wider study area (see **TSA 1**). The latter was drawn to capture a wider proportion of lands, of which Mr. Erwin's lands were within. We would suggest that a similar exercise is undertaken at the appropriate stage aimed at generously defining the limits of the SEL at Nutts Corner, possibly along the lines of the area illustrated at **Annex 2**.



**TSA 1 – Nutts Corner Study**  
(DoE, 1995)

- 2.11 Significant pressures on/lack of infrastructure services (water, sewage etc.) have previously been highlighted as a cause for concern regarding future development at Nutts Corner. Northern Ireland Water (NIW) were consulted with as part of the DPS, concluding that given there is likely to be future growth at Nutts Corner, it may be feasible to install a foul and storm sewerage network and associated wastewater treatment works. We welcome the declaration that recommended solutions to the infrastructure pressures are to be prioritised for delivery within the NIW Capital Works Programme, as this will not only benefit future users but will make great improvements for the long-established businesses at Nutts Corner.
- 2.12 We note that there are two SELs defined as 'other locations' within the DPS, namely Belfast International Airport (BIA) and Nutts Corner. The DPS has a specific and separate policy text relating to the BIA SEL which is understandable given the likely wide variety of uses necessary to maximise the potential of the Airport SEL and meet the operational needs of the airport, which would distinguish this SEL from all other Proposed SELs in the Plan.

#### **Policy DM 1: Economic Development – Zoned Sites and Settlements**

- 2.13 Paragraphs 5.26-5.28 sets out the need for this policy against the requirements of the SPPS to promote sustainable and suitable employment opportunities on an ample supply of employment land retained for economic development purposes.
- 2.14 **Policy DM 1.1** sets out the range of acceptable uses on SELs as – *"Large Scale industrial development, business uses, call centres, research and development facilities, logistics and storage and distribution proposals will be directed towards Strategic Employment Locations (SELs)".* We would agree that this range of uses are consistent with the SPPS and is Sound.
- 2.15 We do not agree with the additional text relating to Nutts Corner which will limit its employment potential- *"Acceptable uses at the Nutts Corner SEL will be limited to industrial development, transport and logistics, and storage and distribution proposals."* We are of the opinion that as currently worded, this makes this policy is **unsound**.
- 2.16 We accept that Nutts Corner's location, at a key node of major transport networks, is likely to continue to attract transport and logistics/storage and distribution users, who would view it preferentially above other SELs for that reason. However, we believe

the role of Nutts Corner should not be restricted to such a narrow scope and should be open to the same opportunity as all other SELs. This has the potential to stifle Nutts Corner, blocking future inward investment from perfectly acceptable alternative employment uses, that may also see strategic advantage of locating at Nutts Corner.

- 2.17 It further limits the job creating potential of Nutts Corner and would make it difficult for Nutts Corner to change/adapt to extreme changes in economic conditions, prejudicing the long-term vitality and viability of the SEL. We would request that the Council seek to allow for a wider scope of industrial/employment uses beyond those listed, affording Nutts Corner similar functions and operational scope as that of the other identified SELs.
- 2.18 We support the recognition and allowance within **Policy DM 1.2**, that complementary Sui Generis employment uses would not dilute the SEL characteristics and will be necessary to ensure a wholistic offering at these locations.



### 3.0 Conclusion

- 3.1 The DPS provides 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, and in this regard we welcome the recognition of the strategic importance of Nutts Corner and the potential of it being designated as Strategic Employment Lands.
- 3.2 To ensure there will be a consistent volume of employment lands available and retained for future use, it is imperative that the Nutts Corner SEL is defined to allow for expansion of existing business and the development of future demands of the industrial, advanced manufacturing, and transport and logistics sectors. Given the prime location of Mr. Erwin's lands at Nutts Corner Road, the most natural and viable use for future development of these lands would be for economic/employment use contained within the SEL for Nutts Corner.
- 3.3 This representation sets out the views of **Mr. Michael Erwin** in respect of the policies contained within the Draft Plan Strategy. It is set out that the Employment Strategy and policies are generally sound, except for the text indicating restricting the role of Nutts Corner SEL. The removal of this restriction would make the policy Sound. Accordingly, we request that these comments are given favourable consideration by the Council in relation to the adoption of the Plan Strategy.
- 3.4 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**

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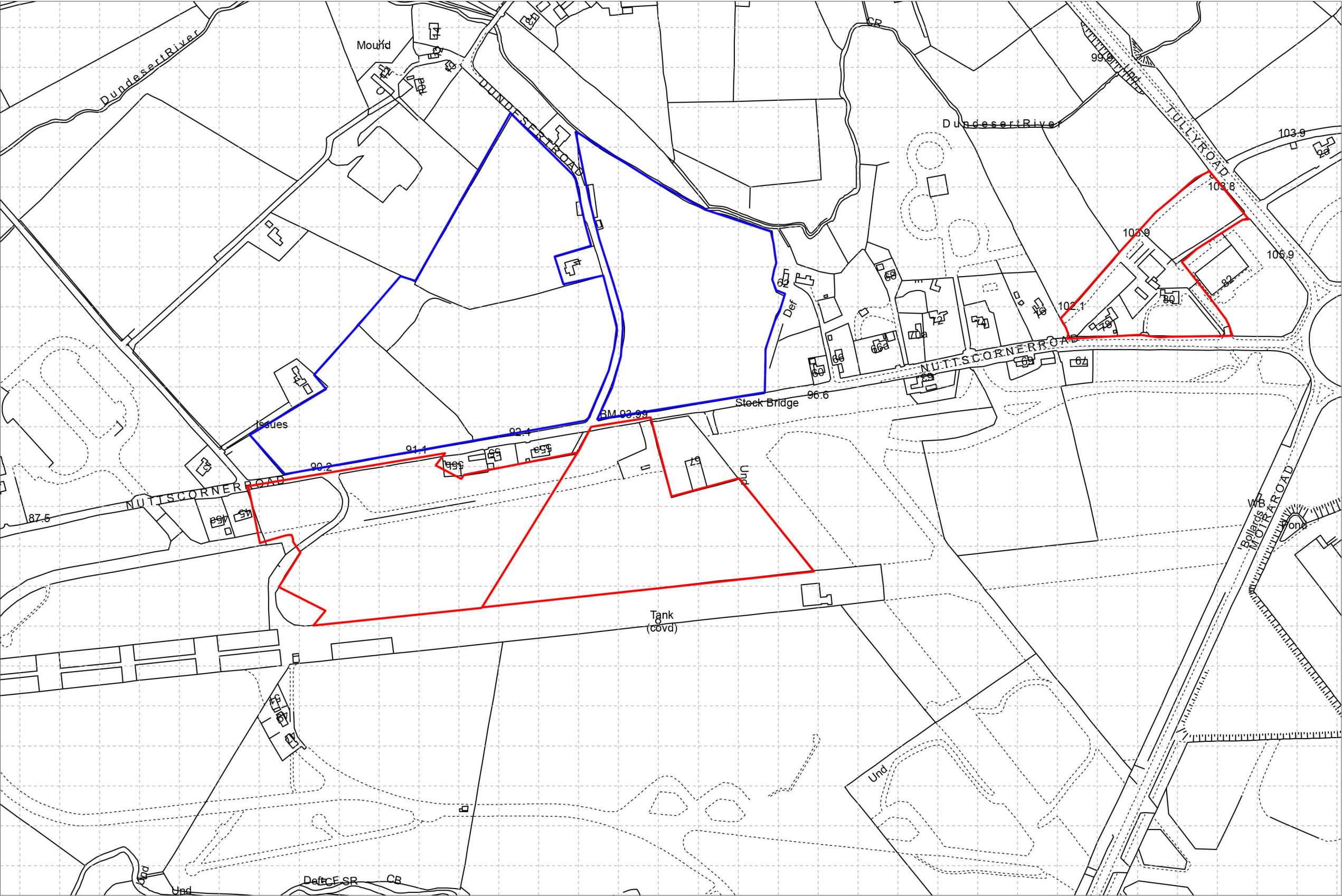
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**Annex 2 – Proposed Nutts Corner SEL Boundary**



