Response ID ANON-3WQE-DUPB-B

Submitted to Local Development Plan 2030 - Draft Plan Strategy Representations Submitted on 2019-09-16 14:41:51

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: Mr

First name: david

Last name: donaldson

Job Title (where relevant): DIRECTOR

Organisation Name (where relevant): DONALDSON PLANNING LTD

Agent Name (If applicable):

Client Name (If applicable): MCCAUSLAND AIRPORT GARAGES LTD

Address: 50A HIGH STREET HOLYWOOD

Postcode (please enter your full postcode): BT18 9AE

Telephone number: 02890423320

What is your email address?

Email: info@donaldsonplanning.com

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: SP3.12

Policy Heading: CAR PARKS

Strategic Policy (SP) Paragraph Number: SP3.12

Detailed Management Policy (DM) Paragraph Number:

Page Number In Document: 113

Proposal Map (If relevant state location):

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

CE2 - Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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:

SP 3.12 refers to provision of parking for users of BIA on lands allocated for airport related uses. Given the importance of this aspect to the Borough, the Strategy should provide an indication of the lands to be allocated for airport related uses. Such lands should include privately owned lands such as McCausland car park and land immediately to north and east, as well as Airport owned lands.

The Policy also refers to airport related parking being supported only if there is a demonstrable need. It is suggested that the location of car parking should be subject to a sequential test, with land in or adjacent to the identified area of airport uses being given priority over lands more remote from the airport.

Upload File:

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Modifications

If you consider the draft Plan Strategy to be 'UNSOUND', 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:

The Strategy should include an indication of the area to be allocated for airport related uses.

It should also add a sequential test into any policy for assessment of airport related parking.

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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?

Yes

Additional Representation 2

What does your second representation relate to?

An 'Unsound' representation

Representation 2 - UNSOUND

Please identify which section of the draft Plan Strategy you consider to be UNSOUND:

Paragraph Number in Document: DM13

Policy Heading: DM13

Strategic Policy (SP) Paragraph Number:

Detailed Management Policy (DM) Paragraph Number: DM13.1

Page Number In Document: 124

Proposal Map (If relevant state location):

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

CE2 - Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

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:

This policy refers to the 'operational boundary' of BIA.

The policy does not clarify that McCausland Airport Garage and the lands utilised for parking (both permanently and for 28 days per annum) are within the operational boundary.

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Modifications

If you consider the draft Plan Strategy to be 'UNSOUND', 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:

The lands currently in use by McCausland for airport related parking (including the 28 day lands) should be confirmed as within the operational boundary.

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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