

Data Protection Officer
Mid and East Antrim Borough Council
The Braid
1-29 Bridge Street
Ballymena
BT43 5EJ

Section B. Your Details

Q1. Are you responding as individual, as an organisation or as an agent acting on behalf of individual, group or organisation? (Required)

Please only tick one

Individual *(Please fill in the remaining questions in the section, then proceed to Section F.)*

Organisation *(Please fill in the remaining questions in the section, then proceed to Section D.)*

Agent *(Please fill in the remaining questions in the section, then proceed to Section E.)*

Q2. What is your name?

Title

MR

First Name **(Required)**

DAVID

Last Name **(Required)**

DONALDSON

Email

david@donaldsonplanning.com

Q3. Did you respond to the previous Preferred Options Paper?

Yes

No

Unsure

Section C. Individuals

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

Section D. Organisation

If you have selected that you are responding as an organisation, there are a number of details that we are legally required to obtain from you.

If you are responding on behalf of a group or organisation, please complete this section, then proceed to Section F.

Organisation / Group Name **(Required)**

Your Job Title / Position **(Required)**

Organisation / Group Address (if different from above)

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

Section E. Agents

If you have selected that you are responding on behalf of another individual, organisation or group there are a number of details that we are legally required to obtain from you.

Please provide details of the individual, organisation or group that you are representing.

Client Contact Details

Title

First Name **(Required)**

Last Name **(Required)**

Address Line 1 **(Required)**

C/O DONALDSON PLANNING LTD

Line 2

50A HIGH STREET

Line 3

Town **(Required)**

HOLYWOOD

Postcode **(Required)**

BT18 9AE

Q4. Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP?

Please only select one.

Agent

Client

Both

Section F. Soundness

The draft Plan Strategy will be examined at Independent Examination in regard to its soundness. Accordingly, your responses should be based on soundness and directed at specific strategic policies or proposals that you consider to be unsound, along with your reasons. The tests of soundness are set out below in Section M.

Those wishing to make representations seeking to change the draft Plan Strategy should clearly state why they consider the document to be **unsound** having regard to the **soundness tests** in Section M. It is very important that when you are submitting your representation that your response reflects the most appropriate soundness test(s) which you believe the draft Plan Strategy fails to meet. There will be no further opportunity to submit information once the consultation period has closed unless the Independent Examiner requests it.

Those who make a representation seeking to change the draft Plan Strategy should also state whether they wish to be heard orally.

Section J. Type of Procedure

Q5. Please indicate if you would like your representation to be dealt with by:
(Required)

Please select one item only

- Written (Choose this procedure to have your representation considered in written form only)
- Oral Hearing (Choose this procedure to present your representation orally at the public hearing)

Unless you specifically request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Section K. Is the draft Plan Strategy Sound?

Your comments should be set out in full. This will assist the Independent Examiner understand the issues you raise. You will only be able to submit further additional information if the Independent Examiner invites you to do so.

Sound

If you consider the Plan Strategy to be Sound and wish to support the Plan Strategy, please set out your comments below.

(Required)

Section L. Unsound

In this section we will be asking you to specify which part(s) of the draft Plan Strategy you consider to be unsound.

Note: If you wish to inform us that more than one part of the draft Plan Strategy is unsound each part should be listed separately. Complete this page in relation to one part of the draft Plan Strategy only.

Q6. If you consider that the draft Plan Strategy is unsound and does not meet one or more of the tests of soundness below, you must indicate which test(s) you consider it does not meet, having regard to Development Plan Practice Note 6 available at:

https://www.planningni.gov.uk/index/news/dfi_planning_news/news_releases_2015_onwards/development_plan_practice_note_06_soundness_version_2_may_2017.pdf

Please note if you do not identify a test(s) your comments may not be considered by the Independent Examiner.

Continued on next page.

Section M. Tests of Soundness (Required)

Procedural tests

- P1. Has the plan been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
- P2. Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- P3. Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?
- P4. Did the Council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?

Consistency tests

- C1. Did the Council take account of the Regional Development Strategy?
- C2. Did the Council take account of its Community Plan?
- C3. Did the Council take account of policy and guidance issued by the Department?

Coherence and effectiveness tests

- CE1. The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans of neighbouring Councils.
- CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
- CE3. There are clear mechanisms for implementation and monitoring.
- CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.

Section N. Which part(s) of the draft Plan Strategy are you commenting on?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to inform us that you consider more than one part of the draft Plan Strategy is unsound, you can submit further representations by completing and submitting additional copies of this section.

Relevant Policy number(s)

SGS2 SETTLEMENT HIERARCHY

(and/or)

Relevant Paragraph number(s)

(and/or)

District Proposals Map

Please give full details of why you consider the draft Plan Strategy to be unsound having regard to the tests(s) you have identified above. Please be as clear and concise as possible.

SEE ATTACHED PAPER

MEA-DPS-014

If you consider the draft Plan Strategy to be unsound, please provide details of what changes(s) you consider necessary to make the draft Plan Strategy sound.

A large, empty rounded rectangular box with a thin blue border, intended for providing feedback on the draft Plan Strategy. The box is currently blank.

MID AND EAST ANTRIM LOCAL PLAN – RESPONSE TO DRAFT PLAN STRATEGY

LOCATION: KNOCKNAGULLIAGH REF MEA 03

1.0 Introduction

1.1 This submission is in response to the Mid and East Antrim Draft Plan Strategy, published in September 2019. It relates primarily to the Settlement Hierarchy, set out in SGS2.

1.2 Local Development Plans are required to meet a number of tests of 'soundness'. These tests are set out in Development Plan Practice Note 6, extract below:

Procedural tests

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

P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?

P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

Version 2 / May 2017 3

Development Plan Practice Note 6 Soundness

P4 Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?

Consistency tests

C1 Did the council take account of the Regional Development Strategy?

C2 Did the council take account of its Community Plan?

C3 Did the council take account of policy and guidance issued by the Department?

C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

Coherence and effectiveness tests

CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;

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

CE3 There are clear mechanisms for implementation and monitoring; and

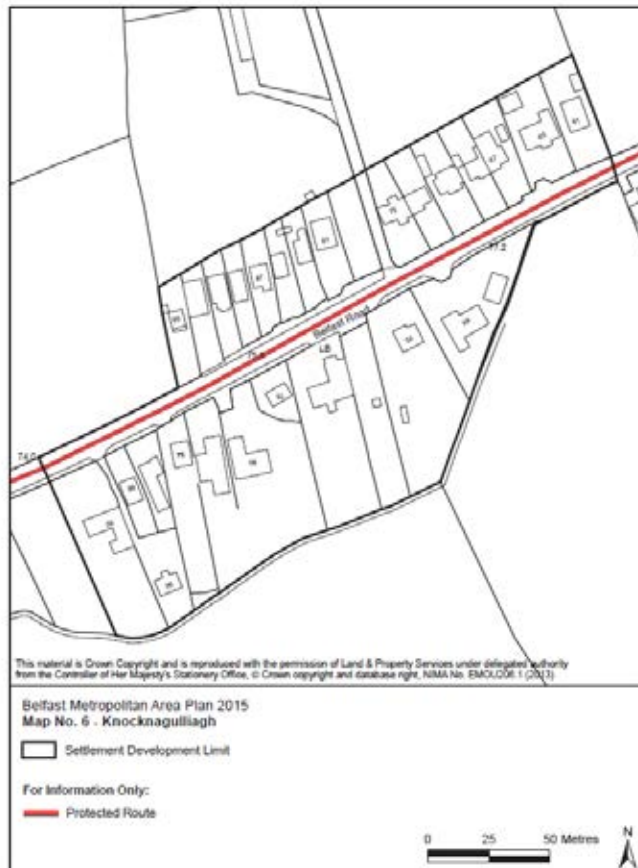
CE4 It is reasonably flexible to enable it to deal with changing circumstances.

1.3 In this case, the Plan Strategy is considered to be unsound in terms of consistency with the RDS (C1) and coherence (CE2) as it no longer identifies Knocknagulliagh as a small settlement.

2.0 General Location

2.1 Knocknagulliagh is a small cluster of development located on the A2 Belfast to Larne Road, just west of Whitehead. It comprises about 27 houses.

2.2 In draft BMAP the settlement is identified and a limit has been drawn tightly around it. Plainly, BMAP acknowledged that there was an identifiable settlement at this location, which could provide some modest opportunities for development.



3.0 SGS2 Settlement Hierarchy

3.1 The proposed settlement hierarchy for Mid and East Antrim identifies 3 main towns; 5 small towns; 11 villages and 17 small settlements. It is noted that 8 of the small settlements are new designations, ie they were not previously identified in the relevant development plans.

3.2 The Regional Development Strategy supports the need to sustain rural communities. Policy SFG13 below endorses the importance of such communities in maintaining the natural and built environment.

SFG13: Sustain rural communities living in smaller settlements and the open countryside

3.98 The distinctive settlement pattern of main and small towns, villages and dwellings in the open countryside is unique within these islands. Many people working on the land are conscious of continuing a cultural tradition. They have a strong interest in sustaining that tradition, the land itself and the living that it provides. It is important that development is sensitive to these issues. The rural community is the custodian of our exceptional natural and built environment. In rural areas, the aim is to sustain the overall strength of the rural community living in small towns, villages, small rural settlements and the open countryside.

- 3.3 In a policy context which supports local rural communities the rationale for the proposed de-designation of some small settlements is unclear, especially when other new settlements have been identified.
- 3.4 The population in the 17 proposed small settlements totals 1,001 persons, according to Table A2. This equates to just 58 persons per settlement. Knocknagulliagh is comparable in population terms to the settlements identified.
- 3.5 Some of the settlements identified appear to be very small, and offer little in the way of community facilities. Examples are below:



Craigywarren – a ribbon of houses.



Mounthill – a small cluster at a crossroads



Raloo – a small cluster at a crossroads



Slaght – houses and farm group.

- 3.5 Knocknagulliagh is comparable in size to many of the settlements identified. It comprises about 27 houses, so with a mean household size of 2.4 persons, its population is estimated at around 62 persons. This is more than the average of the 17 small settlements identified, and it clearly compares favourably in terms of location to some of the settlements which have been included.



Knocknagulliagh

- 3.6 It is also relevant to note (from Table A3) that the housing allocation for Whitehead will require additional land to be designated. Being so close to Whitehead, Knocknagulliagh clearly has potential to accommodate a small proportion of this need, and thus provide some choice in terms of housing availability and location.
- 3.7 Whilst site selection will be a matter for the Local Policies Plan, it is apparent that the lands indicated below are suitable for residential development:



- 4.0 Conclusions
- 4.1 The Settlement Hierarchy is considered to be inconsistent and unsound in its identification of small settlements. Knocknagulliagh should continue to be defined in the LDP as a settlement. This will allow consolidation and allocation of land for modest development at LPP stage.