Local Development Plan 2030

draft Plan Strategy Response Form

September 2019

www.midandeastantrim.gov.uk/planning
Mid and East Antrim draft Plan Strategy 2030

Overview

The Local Development Plan is primarily about delivering sustainable development and improving the quality of life and wellbeing of communities in Mid and East Antrim. It sets out a Spatial Growth Strategy underpinned by other strategic policies and proposals as a means of ensuring that development is high quality, meets local needs and is located in the appropriate places convenient to jobs and public services.

The Local Development Plan will also balance competing demands ensuring that new development respects our quality landscapes and our precious natural and historic environment, all of which expresses the unique identity of our Borough and underpins our growing tourism sector. Through guiding future development and use of land in our towns, villages and rural areas, the Local Development Plan will provide certainty as, under the new Plan-led system, it will be the first thing to be taken into account by Council when taking planning decisions. The Local Development Plan is a powerful tool for place-shaping and will assist in the delivery of our Community Plan ‘Putting People First’.

The draft Plan Strategy sets out how our Borough will grow and change up to the year 2030. It puts forward our Plan vision and strategic objectives for the future. It also contains a Spatial Growth Strategy and supporting Strategic Spatial Proposals indicating where growth should be directed in the Borough. It also sets out a range of Strategic Subject Policies under the five key themes of Sustainable Economic Growth; Building Sustainable Communities; Transportation, Infrastructure and Connectivity; Stewardship of our Built Environment and Creating Places and Safeguarding our Natural Environment, which together will support the Spatial Growth Strategy and inform future planning decisions.

How we got here

The draft Plan Strategy is the first of two documents, which comprise the Local Development Plan. Once adopted, it will be followed by the Local Policies Plan which will set out our detailed site-specific proposals such as land use zonings and local designations such as settlement limits and town centre boundaries. The draft Plan Strategy has been developed following extensive engagement with the public, stakeholders and our elected Members and follows on from the publication of our Preferred Options Paper in June 2017. The key stages in this phase of the plan making process are shown below.

<table>
<thead>
<tr>
<th>Stage</th>
<th>Description</th>
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<tbody>
<tr>
<td>1</td>
<td>Preferred Options Paper (POP) issued with evidence base and consultation period</td>
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<tr>
<td>2</td>
<td>Publish draft Plan Strategy for 4 week pre-consultation followed by 8 week consultation period</td>
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<tr>
<td>3</td>
<td>Further 8 week period for counter representations</td>
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<tr>
<td>4</td>
<td>Independent Examination of Draft Plan</td>
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<tr>
<td>5</td>
<td>Adoption of Plan strategy, Commence Local Policies Plan process</td>
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</tbody>
</table>
How We Are Consulting
The easiest and quickest way to comment is by completing our online response form:
consult.midandeastantrim.gov.uk

Alternatively, complete this draft Plan Strategy Response Form and either return by email to planning@midandeastantrim.gov.uk or download a copy and post to:

Local Development Plan
Team, County Hall, 182
Galgorm Road,
Ballymena,
BT42 1QF.

The draft Plan Strategy is published for formal public consultation for a period of eight weeks beginning on Wednesday 16 October and closing at 5pm on Wednesday 11 December 2019. Please note that in order for comments to be considered valid you must include your contact details. We will use these details to confirm receipt of comments and to seek clarification or request further information. Anonymous comments or comments which do not directly relate to the draft Plan Strategy will not be considered as part of the consultation process. For further details of how we handle representations, please refer to our Polices Notice which can be accessed here https://www.midandeastantrim.gov.uk/downloads/privacy notice ldp.pdf.

Section A. Data Protection

Local Development Plan Privacy Notice

Mid and East Antrim Borough Council is a registered data controller (ZA076984) with the Information Commissioner’s Office and we process your information in accordance with the General Data Protection Regulation and Data Protection Act 2018.

Mid and East Antrim Borough Council collects and processes personal information about you in order to fulfil our statutory obligations, to provide you and service users with services and to improve those services.

Our Privacy Notice relates to the personal information processed to develop the Council’s Local Development Plan (LDP) and can be viewed at https://www.midandeastantrim.gov.uk/downloads/privacy notice ldp.pdf. It contains the standards you can expect when we ask for, or hold, your personal information and an explanation of our information management security policy. All representations received will be published on our website and made available at our Local Planning Office, County Hall, 182 Galgorm Road, Ballymena, for public inspection and will be will be forwarded to the Department of Infrastructure in advance of Independent Examination.

If you wish to find out more about how the Council processes personal data and protect your privacy, our corporate privacy notice is available at www.midandeastantrim.gov.uk/privacy-notice.

Why are we processing your personal information?

- To enable the preparation of the Council’s Local Development Plan;
- To consult your opinion on the Local Development Plan through the public consultation process as well as other section functions;
- To ensure compliance with applicable legislation;
- To update you and/or notify you about changes; and
- To answer your questions.

If you wish to find out more information on how your personal information is being processed, you can contact the Council’s Data Protection Officer:
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

MR
DAVID
DONALDSON
david@donaldsonplanning.com

MEA-DPS-014
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:

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
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.
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:

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<th>Procedural tests</th>
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<td>CE1</td>
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<td>CE3</td>
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<tr>
<td>CE4</td>
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</tbody>
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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 Lame 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, i.e. 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.
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.
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.
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.