

How We Are Consulting

The easiest and quickest way to comment is by completing our online response form:

consult.midandeantrim.gov.uk

Alternatively, complete this draft Plan Strategy Response Form and either return by email to planning@midandeantrim.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.midandeantrim.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.midandeantrim.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.midandeantrim.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)**

Eamonn

Last Name **(Required)**

Loughrey

Email

eamonn@inaltus.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.

Alexander Property Holdings

Client Contact Details

Title

First Name **(Required)**

[Redacted]

Last Name **(Required)**

[Redacted]

Address Line 1 **(Required)**

[Redacted]

Line 2

Line 3

Town **(Required)**

[Redacted]

Postcode **(Required)**

[Redacted]

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)

Retail and Town Centres Section 7.2

(and/or)

Relevant Paragraph number(s)

7.26-7.211

(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.

A large, empty rounded rectangular box with a thin blue border, intended for the user to provide full details of why they consider the draft Plan Strategy to be unsound. The box is currently blank.

MEA-DPS-032

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 details of changes to the draft Plan Strategy. The box is currently blank.

Mid and East Antrim Local Development Plan 2030

Response to Draft Plan Strategy

Ref: 16/11 (18)(PS)

Client: Alexander Property Holdings

1. We make this further submission on behalf of Alexander Property Holdings. Alexander Property Holdings own a 2.13 acre (0.86 ha) (excluding Alexander Street roadway) site in Alexander Street, Ballymena.
2. We have made a response to the POP which is attached at **Appendix A**. Our submission was that:
 - a. we endorsed the inclusion of Ballymena Town Centre as a main town centre;
 - b. our client's land was available for mixed use development which would include residential and non retail uses;
 - c. our client's lands should be identified as a priority for regeneration;
 - d. we agreed with the sequential approach for Class B1 investors and that the Alexander Street site could be a location for B1 use;
 - e. we further suggested the designation of our client's site as a Development Opportunity Site.
3. The lands are illustrated at **Appendix A**.

Details

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

4. The Plan is unsound because:-
 - P2 The Council has not taken properly into account representations made at the POP stage;
 - C3 The Council has not taken account of the SPPS and the requirement to promote the town centre as the first location for all main town centre uses;

- CE1 The Council has not set out a Strategy from which all policies logically flow as the Strategy does not use the assessment of need to designate town centre boundaries and Development Opportunity Sites;
 - CE2 The Strategy, policies and allocations have been deferred to the Local Policies Plan when they are matter of a strategic nature, and there is an up to date evidence base in the form of a Retail and Commercial Leisure Need & Capacity Study that can inform the Plan Strategy;
 - CE4 The Plan Strategy is not reasonably flexible to deal with changing circumstances. The Plan Strategy has deferred allocating Development Opportunity Sites until the Local Polices Plan.
5. The designation of a town centre, its boundary and the designation of Development Opportunity Sites are strategic matters that should be considered in the draft Plan Strategy. The Council have already commissioned Nexus to undertake a Retail & Commercial Leisure Needs & Capacity Study which is available to inform the future growth of the town centre. This Study is dated January 2019. It is already a year old. When the Local Policies Plan is being debated the Nexus Study will be out of date and will need to be updated.
 6. The size, scale and future retail, leisure and business requirements of a town centre are strategic matters that should be considered now.
 7. We note that the draft Plan Strategy paragraph 7.2.11 indicates that a call for sites will take place during the Local Policies Plan stage when development opportunity sites will be identified, however, that approach groups these strategic investment locations in with the process of designating individual housing sites and all other site specific designations and zoning. The level of detail will be immense and the PAC will quite reasonably take time to deliberate all objections. However, that clearly has implications for the delivery of the final adopted Local Policies Plan and the delivery of town centre investment.
 8. The progress of the Local Development Plan has already been drawn out, and the adoption of a Local Policies Plan is unlikely until 2025 or perhaps later. The delivery of a major town centre regeneration scheme takes time to bring through the planning process and time to deliver. Having an up to date Plan Strategy that sets the context for what is likely to be

allowed on a site improves the marketability and attraction of lands which can in turn secure end users.

9. Debates about the scale and nature of a proposal, which can in turn be set out in Key Site Requirements should be had as part of the draft Plan Strategy and should not be allowed to be held up as part of the more general housing sites allocations debates in the Local Policies Plan.
10. We note policy RET 1 deals with retailing and other town centre uses, however, it does not mention housing. We consider that policy RET 1 should relate to all town centre development, and a sentence included to say that housing development and B1 offices uses inside the town centre will be welcomed.
11. In terms of policy ECD 1 we acknowledge and welcome the promotion of town centres as a location for B1 business use.

Changes

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

12. We would therefore be grateful if the Council would now reconsider the decision to leave Development Opportunity Sites to the Local Policies Plan stage and consult now on what sites are available to meet the commercial, business and leisure needs of Ballymena and include our client's site at Alexander Street as a Development Opportunity Site for mixed use.
13. We request policy RET 1 include allowance for residential and B1 uses.

Appendix A

- A. POP Submission (including Site Map)

APPENDIX A

Mid and East Antrim Local Development Plan 2030

Response to POP Paper

Ref: 16/11 (18)

Client: Alexander Property Holdings

1. We make this submission on behalf of Alexander Property Holdings. Alexander Property Holdings own a 2.13 acre (0.86 ha excluding Alexander Street roadway) site in Alexander Street, Ballymena. These lands are located within the town centre and link to William Street, Ballymoney Street and Broughshane Street.
2. The site has previously been granted permission for a shopping centre but due to the economic climate it has not been delivered.
3. Our clients expect these lands will be retained within the town centre, and would support the lands being identified as a development opportunity site for future mixed use.
4. The lands are illustrated at **Annex A**.

Q.2. Do you agree with our LDP Strategic Objectives?

5. We welcome Economic Objectives E and G.

Q.4. Do you agree with our preferred option to securing developer contributions from landowners and/or developers?

6. Our clients do not oppose developer contributions and welcome a policy to ensure that applications and investment are welcome. An appropriately worded policy would ensure that all developments are subject to the same requirement, and the investment should not be left to the housing and economic sector. We agree with Option 1 (a).

Q.5. Do you agree with the Preferred Option for our Settlement Hierarchy?

7. We endorse Ballymena's inclusion as a Main Town. This is consistent with the RDS 2035.

Q.10. Do you agree with the proposed classification for our centres and their suggested roles?

8. We would endorse the classification in respect of town centres. Our client's lands are suitable for a mixed use development. Housing and non-retail uses may support the retail led regeneration of the site in future years.

9. We note that the Council have to prepare a Retail Capacity Study and this should be done at an early stage to ensure that the scale of future retail and leisure uses are identified and adequate lands are allocated for them. Our clients site is a key site within the town centre and must be given priority for regeneration in the forthcoming plan and any designations that arise.

Q.12. Do you agree with the Preferred Option for defining our network and hierarchy of centres?

10. We agree that Ballymena town centre should be a main town and a main town centre in the MEA.

Q.13. Do you agree with our suggested sequential approach for Class B1 Business Uses?

11. We agree with the sequential approach as set out as this provides the necessary flexibility for Class B1 investors. We would suggest that our clients site at Alexander Street is suitable for future B1 uses and this should be directed to it within the Plan.

Q.19 Do you agree with our suggested approach to promoting retail development and enhancing diversity in the range of town centre uses?

12. We agree with the Council's suggested approach to designate PRCs and the designation of specific sites for mixed use development. Our clients site does not form part of the primary retail core, but it should be designated as a mixed use development opportunity and future government/council regeneration monies should be allocated to support its regeneration.

Q.20 If so, should Primary Retail Cores be designated in all town centres, or specify which?

13. Ballymena should have a PRC, focused principally on the shopping centre of Fairhill, which is the primary shopping centre in the town. The streets in the town rely upon a mix of uses and to allocate them as PRC would result in loss of potential investment, persistent vacancies and loss of rates to the public purse. Alexander Street is located between Fairhill

Shopping Centre and the rest of the town centre and any development within it (retail or non-retail) will promote footfall in the town centre and should be welcomed.

Q.21 Do you agree with our suggested approach to protecting/promoting other land uses in town centres?

14. We agree that housing and B1 uses should be promoted in the town centre. Such uses can support large scale mixed use development and regeneration of town centres. We do not consider that existing housing areas should be protected, as developments that seek to regenerate areas may result in the loss of some older housing in town centres. Policy should not frustrate regeneration by protecting housing, when housing is likely to be promoted in regeneration schemes in any event.

Q.22 Do you think we should promote any other compatible uses within the town centre?

15. Town centres should welcome most uses and the policy should be flexibility to permit any uses provided they are compatible to the primary function of retailing and commerce.

Other Matters

16. We would request that the Council give consideration to retention of these lands within the town centre of Ballymena to be zoned as a development opportunity site.

Annexes

- A. Site Map



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