

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 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)

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.

Bridge Park Developments Limited

Client Contact Details

Title

First Name (Required)

Last Name (Required)

Address Line 1 (Required)

Chamber of Commerce House

Line 2

22 Great Victoria Street

Line 3

Town (Required)

Belfast

Postcode (Required)

BT2 7BA

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)

SGS 7 Retail Hierarchy & Policy ECD 1

(and/or)

Relevant Paragraph number(s)

5.5.5-5.5.9

(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.

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 Development Plan 2030

Response to POP Paper

Ref: 16/11 (19)(PS)

Client: Bridge Park Developments

1. We make this further submission on behalf of Bridge Park Developments. Our clients own Bridge Park which is a large retail development located just beside the A36 Larne Link Road and is anchored by Dunelm.
2. We have made a response to the POP which is attached at **Appendix A**. Our submission was that:
 - a. the area around Bridge Park is commercial in nature with a large Tesco superstore located behind Bridge park and the surrounding area includes industrial and economic development with large areas of residential use close by. The site has the characteristics of a District Centre and would be suitable to support retail and B1 office use;
 - b. we supported the inclusion of District Centres as part of the strategic objectives for economic development;
 - c. we opposed the use of the old PPS 5 definition of District Centres which has no policy basis;
 - d. we identified that the area around Bridge Park provided a mix of local day to day uses that are worthy of protecting; and
 - e. we supported the inclusion of District Centres as locations in the sequential test for B1 uses.
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:-

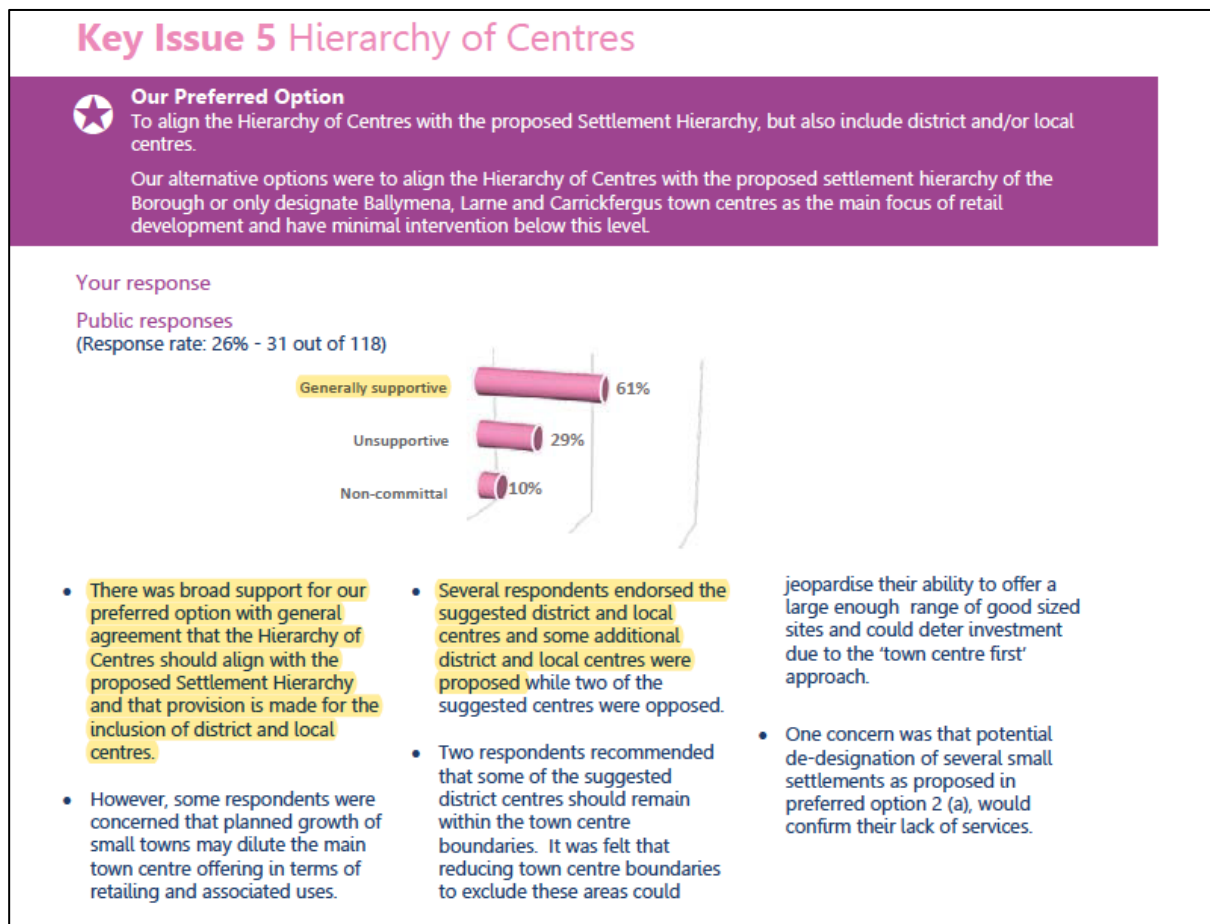
- P2 The Council has not taken properly into account representations made at the POP stage. Many respondents to the POP supported the retail hierarchy including the designation of District Centres;
- C3 The Council has not taken account of the SPPS and the requirement to define a network and hierarchy of centres including District Centres;
- CE1 The Council has not set out a Strategy from which all policies logically flow as the Strategy does not include a robust assessment of need and subsequent designation of District Centre boundaries;
- CE2 Retail 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 lacks flexibility as it is not clear whether the identified retail and office floorspace growth for Ballymena can be accommodated in the defined centres in the Retail Hierarchy.

5. The designation of a District Centre and its boundary are strategic matters that should be considered in the draft Plan Strategy. The Council have already commission Nexus to undertake a Retail & Commercial Leisure Needs & Capacity Study (Nexus Report) which is available to inform the future growth of the town and retail centres in the Plan area and the quantitative need for addition retail floorspace.

6. Nexus were also commissioned to consider the retail hierarchy and produced Retail Hierarchy Paper to provide the Council with guidance. Surprisingly policy SGS 7 Retail Hierarchy excludes any reference to District Centres.

7. It should be noted that Council's Consultation Report for the POP (extract below) notes that there was a 61% support for the retail hierarchy as provided in the POP. As a key test of soundness is to have regard to the POP representations made, it is unclear why the

Council considered it necessary to commission external consultants to decide whether the retail hierarchy was acceptable or not.



Extract of POP Consultation Report

- The consultation report notes that the Department for Infrastructure (DfI) raised concerns that the designation of District and Local Centres that are separated from town centres by main roads could be seen to dilute the ethos and spirit of the town centre first approach. This shows a fundamental misunderstanding of the role of a District Centre. A District Centre as set out in SPPS is to be the '*focus for local everyday shopping and ensure their role is complementary to the role and function of the town centre*'. Designation of a District Centre does not by definition dilute the spirit of the town centre first approach otherwise the SPPS would make this clear. If a shopping centre complements the town centre and is the focus for local day to day shopping (i.e. convenience shopping) then it can be considered as a District Centre.

9. Whether a centre suggested in the draft Plan Strategy fulfils the policy requirements of the SPPS is a matter for debate at the Public Inquiry. It is not a matter for Nexus Planning to rule out entirely the need for District Centres based on a fundamental misinterpretation of the SPPS. Moreover we are surprised that Nexus fail in their Mid and East Antrim – Retail Hierarchy Paper when considering policy fail to note SPPS paragraph 6.276 in seeking to define and understand the role and function of a District Centre.
10. The Nexus Retail Hierarchy Paper only looks at those centres which were identified in the POP. It did not consider the merits of the Bridge Park as a District Centre. Nexus note in Figure 3 of their Retail Hierarchy Paper that Braidwater Park (i.e. Sainsbury's) had a convenience goods market share of 7.1%. An extract of Table 3 of the Nexus Report Appendix D is below. This shows Sainsbury's to have a market share of 5.6% not 7.1%. Significantly the Tesco at Bridge Park has a market share of 14.4%. The Bridge Park is the single most important location for local convenience goods shopping in the MEA and it seem illogical to have excluded it from consideration.

SUBTOTAL	3.5	16.7	5.1	1.4	5.9	4.2	28.5	10.9	97.6	4.2	5.0	0.0	0.0	0.0	0.0	0.0	0.0	5.2	0.0
Zone 4																			
Sainsbury's, Braidwater Retail Park, Larne Road Link, Ballymena, BT42 3AG	0.0	1.8	5.6	5.2	1.0	17.7	3.9	12.5	3.8	26.5	5.2	0.8	0.0	0.0	0.0	0.0	0.0	1.4	0.0
Spar, Fernside Road, Killy, BT42 3UP	0.0	1.2	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.6	24.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.7
Spar, Larne Road, Ballymena, BT42 3HA	0.0	0.4	0.1	0.0	0.0	0.0	0.0	0.0	1.0	0.0	5.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Supervalu, Main Street, Killy, Ballymena, BT42 3BH	0.5	2.3	0.7	0.0	0.0	1.0	0.0	0.0	0.0	4.8	37.5	0.0	0.0	0.0	0.0	0.0	0.0	7.6	0.0
Tesco Superstore, Larne Road, Ballymena, BT42 3HB	21.2	1.5	14.4	9.3	1.9	44.4	3.9	42.9	0.0	48.7	3.9	1.5	0.9	0.0	0.0	0.0	0.0	1.3	0.0
Other stores, zone 4	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.7	4.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SUBTOTAL	29.7	7.3	21.1	14.4	2.8	63.1	7.8	55.4	4.8	71.3	80.6	2.3	0.9	0.0	0.0	0.0	7.6	2.6	1.7
Zone 5																			
Asda, Redlands Road, Larne, BT40 1AX	12.4	4.3	9.1	0.0	0.0	0.0	0.0	10.2	3.0	0.0	0.0	68.0	21.5	2.7	0.0	1.5	0.0	0.6	0.0
Dunnes Stores, Broadway, Larne, BT40 1LT	1.0	0.2	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.3	0.9	0.0	0.0	1.5	0.0	0.0	0.0
Ireland, Point Street, Larne, BT40 3HJ	0.4	1.4	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.1	7.7	0.0	0.0	0.0	0.0	0.0	0.0
Lidl, Circular Road, Larne, BT40 1JS	0.6	0.6	0.5	0.0	0.0	0.0	0.0	0.6	0.0	0.0	0.0	2.9	3.3	0.0	0.0	1.1	0.0	0.0	0.0
Local shops, Larne Town Centre	0.1	2.4	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	13.2	0.0	0.0	0.0	0.0	0.0	0.0
Spar, Linn Road, Craigy Hill, Larne, BT40 3AL	0.1	3.7	0.3	0.0	0.0	0.0	0.0	0.0	7.5	0.0	0.0	9.0	0.0	0.0	0.0	0.8	0.0	0.0	0.0
Spar, Redlands Courtguard Road, Larne, BT40 1AX	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other stores, zone 5	0.1	0.5	0.1	0.0	0.0	0.0	0.0	0.7	0.0	0.0	0.0	3.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SUBTOTAL	15.8	17.8	13.2	0.0	0.0	0.0	0.0	11.5	10.4	0.0	0.0	86.7	56.5	2.7	0.8	4.9	0.0	0.6	0.0
Zone 6																			
Europcar, Victoria Road, Carrickfergus, BT36 7ZE	0.2	0.4	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.7	4.6	0.0	0.0	0.0	0.0
Home Bargains, The Gateway Centre, Lancasterian Street, Carrickfergus, BT36 7AB	0.0	0.3	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	7.6	0.0	0.0	0.0	0.0

Extract of Nexus Retail & Commercial Leisure Need & Capacity Study Appendix D Table 3

11. We would also note that the Northcott Shopping Centre in Glengormley is a District Centre and it is anchored by only two main shops being Tesco and The Range. Antrim and Newtownabbey Council are continuing to define that Centre as a District Centre in their draft Plan Strategy. The Bridge Park is of similar characteristics and scale to Northcott with a wider range of units and wider scope to provide B1 and non retail service uses (as discussed below).

12. Moreover, we note that Nexus find a clear quantitative need for 4,600 sq m – 5,900 sq m for convenience goods and between 4,500 sq m and 7,400 sq m in comparison goods in Ballymena by 2030. No indication is provided in the draft Plan Strategy as to whether this floorspace can be accommodated inside the town centre or whether some of it should be allowed to be located in District Centres such as Bridge Park. Allowing further local day to day shopping at Bridge Park could complement the role of the town centre and help reduce congestion in the town centre.
13. Further allocating District Centres widens the potential to increase employment in the Borough. The draft Plan Strategy has an upper figure of net employment of 4,000 new jobs.
14. The Ulster University Economic Policy Centre Report Technical Supplement 5 Appendix D (shown below) identifies that the demand for general office space (B1) is likely to grow by between 7,331 sq m and 46,282 sq m.

Table 4: Anticipated Employment Space Demand for Employment Space, Mid & East Antrim, 2017-2030

		Baseline (sq. metres)	2017-2030 Upper (sq. metres)	Lower (sq. metres)
A1	Retail	-5,661	-3,488	-7,764
A2	Finance & Professional Services	-41	3,673	-1,354
A3	Restaurants & Cafes	-1,261	-216	-2,111
B1A	General Offices	19,531	46,282	7,331
B1B	R&D Space	-14,953	-8,000	-31,042
B1C	Light Industrial	-49,367	-9,532	-152,102
B2	Industrial & Manufacturing	-10,656	-7,579	-20,719
B8	Storage & Distribution	-7,448	31,411	-92,159
B Mixed Class	Small Business Workspace	5,871	16,316	-1,668
C1	Hotels	14,778	33,285	4,557
D2	Fitness Centres/Leisure/Cultural	1,962	5,779	-1,084
	Total	-47,246	107,933	-298,116

Source: Home and Communities Agency & UUEPC Local Model Winter 2018 Outlook

Extract of Ulster University Economic Policy Centre Report Technical Supplement 5 Appendix D

15. Adding this floorspace to the retail convenience and comparison floorspace needed means there is a combined minimum need for 16,431 sq m (176,863 sq ft) and a maximum need for 59,582 sq m (641,340 sq ft) of retail and office floorspace in Ballymena by 2030.
16. The Council's Plan Strategy has not given any consideration to where this space can be provided and whether it can indeed be accommodated in their preferred locations (i.e. the town centre). This is a clearly strategic matter that should be considered at this stage of the Plan and for the Council to have removed any allowance for District Centres clearly has the potential to undermine the general sequential approach advanced by the SPPS as if there is no scope to accommodate this floorspace in the town centre or its edge, it can lead to a proliferation of development in undesignated locations. A sequentially preferable location must be inside or on the edge of already established District Centres and as such the Retail Hierarchy at SGS 7 should include District Centres of which Bridge Park should be one.
17. We consider that policy ECD 1 should be amended to include District Centres as a location suitable for class B1 uses.

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.

18. The Council's Retail Hierarchy at SGS 7 should be amended to include District Centres and include Bridge Park as a District Centre.
19. Policy ECD 1 should be amended to allow B1 uses inside District Centres.

Appendix

- A. POP Submission (including Site Map).

Appendix A

Mid and East Antrim Local Development Plan 2030

Response to POP Paper

Ref: 16/11 (19)

Client: Bridge Park Developments

1. We make this submission on behalf of Bridge Park Developments. Our clients own Bridge Park.
2. Bridge Park is a retail development located adjacent to the dualled A36 Larne Link Road, Ballymena. It is about 850m from the edge of Ballymena Town Centre as defined in the Ballymena Area Plan 1986-2001. It is an attractive retail location, with excellent visual prominent from the A36. The site has about 120m frontage onto Larne Link Road and about 115m frontage onto the sites' secondary access road. It sits about 4-6 m above the Larne Link Road. The site is about 500m from the Larne Road Roundabout at the M2 Motorway.
3. The site was originally developed in the 1990s as a retail warehouse development. We are advised that the development currently comprises 43,700 sq ft (4,060 sq m) gross floorspace at ground floor level. This comprises one large unit currently occupied by a Dunelm store of about 32,000 sq ft (2,973 sq m) and two adjacent retail warehouse units with a total floorspace of 11,700 sq ft (1,087 sq m) occupied by Jollyes Pet Store and a Habitat for Humanity.
4. The area around the site is commercial in nature, with the large Tesco superstore located to the immediate northeast of the site. Close by is the residential developments at Crebilly Road (Meadowvale) and Larne Road (Chichester Road). The area is the focus for food and non food shopping for a large part of Ballymena. The surrounding area also includes industrial and economic development. It is an area that would be suitable to be designated and regenerated into a District Centre for Ballymena given retail and B1 business uses would be compatible with the surrounding area.



Proposed District Centre

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

5. We welcome Economic Objective G. However, we consider the objectives should specifically makes reference to the promotion of District Centres to be designated to support local shopping and B1 business provision.

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. The classification for District Centres adopts the historic PPS 5 definition, which has no policy basis. However, for the purpose of a definition it should be noted that a District Centre is not required to have all the stipulated uses. For example, the banking sector has contracted and many shopping areas have no local bank, given people do online banking. Also, large supermarkets offer a much broader range of services and can include cafes and opticians and pharmacies, and hence they can support a local community.
9. The definition should make an allowance for wider retail uses.

Q.11. Can you identify any groupings of retail and associated development that could be considered as District Centres?

10. Yes. Bridge Park and Tesco combined form a District Centre as set out in the Map above.
11. Tesco provides a main food shopping offer and a mix of additional services and uses including ATM machines, off licence and a café. Bridge Park supports the shoppers in the area and many make linked trips between Tesco and Bridge Park.
12. Given the Council's proposal to classify Braidwater Retail Park as a District Centre, the area of Bridge Park/Tesco are of a similar scale and nature, and consistency would suggest that it is designated a District Centre.

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

13. We disagree with the hierarchy as it excludes the Bridge Park/Tesco development. This should be included in the hierarchy as a District Centre.

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

14. 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 Bridge Park is suitable for future B1 uses and this should be directed to it within the Plan as a District Centre.

Conclusion

15. We would request that the Council give consideration to retention of these lands within the town of Ballymena to be zoned as a District Centre for retail and future B1 business use.