

## How We Are Consulting

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

[consult.midandeantrim.gov.uk](http://consult.midandeantrim.gov.uk)

Alternatively, complete this draft Plan Strategy Response Form and either return by email to [planning@midandeantrim.gov.uk](mailto: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](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](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 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](http://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.

Galgorm Group

**Client Contact Details**

Title

First Name **(Required)**

[Redacted]

Last Name **(Required)**

[Redacted]

Address Line 1 **(Required)**

[Redacted]

Line 2

Line 3

Town **(Required)**

Ballymena

Postcode **(Required)**

BT42 1JQ

**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](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)

Strategic Social Objective C; SGS3; SGS5

(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.

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-034

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 (18)(PS)

Client: Galgorm Group

1. We make this further submission on behalf of the Galgorm Group. The Galgorm Group owns a 4 acre (1.62 ha) site abutting Fenaghy Road, Ballymena. These lands are located on a main road between Ballymena and Cullybackey, between River Maine and west of Fenaghy Road, (approximately 200m south of the Fenaghy Road/Corbally Road junction, and directly opposite Galgorm Industrial Estate), BT42 1AQ.
2. We have previously made a representation to the POP, seeking the lands be identified as suitable for further economic development. We are instructed by our client that based on the recent technical studies provided by the Council's experts, namely the University of Ulster Economic Policy Centre, and the comments in the draft Plan Strategy that the Council area will need an upper limit of 4,122 jobs, our clients now intend to promote their lands at Fenaghy Road as a housing site.
3. We would therefore be grateful if the Council would now include this site within its Urban Capacity Study going forward.
4. 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.

5. The Plan is unsound because:-
  - CE4 The Plan Strategy is not reasonably flexible to deal with changing circumstances.

6. The Plan Strategy does not have adequate realistic Urban Capacity Sites to provide sufficient housing lands to cover likely Housing Requirements.

## **Changes**

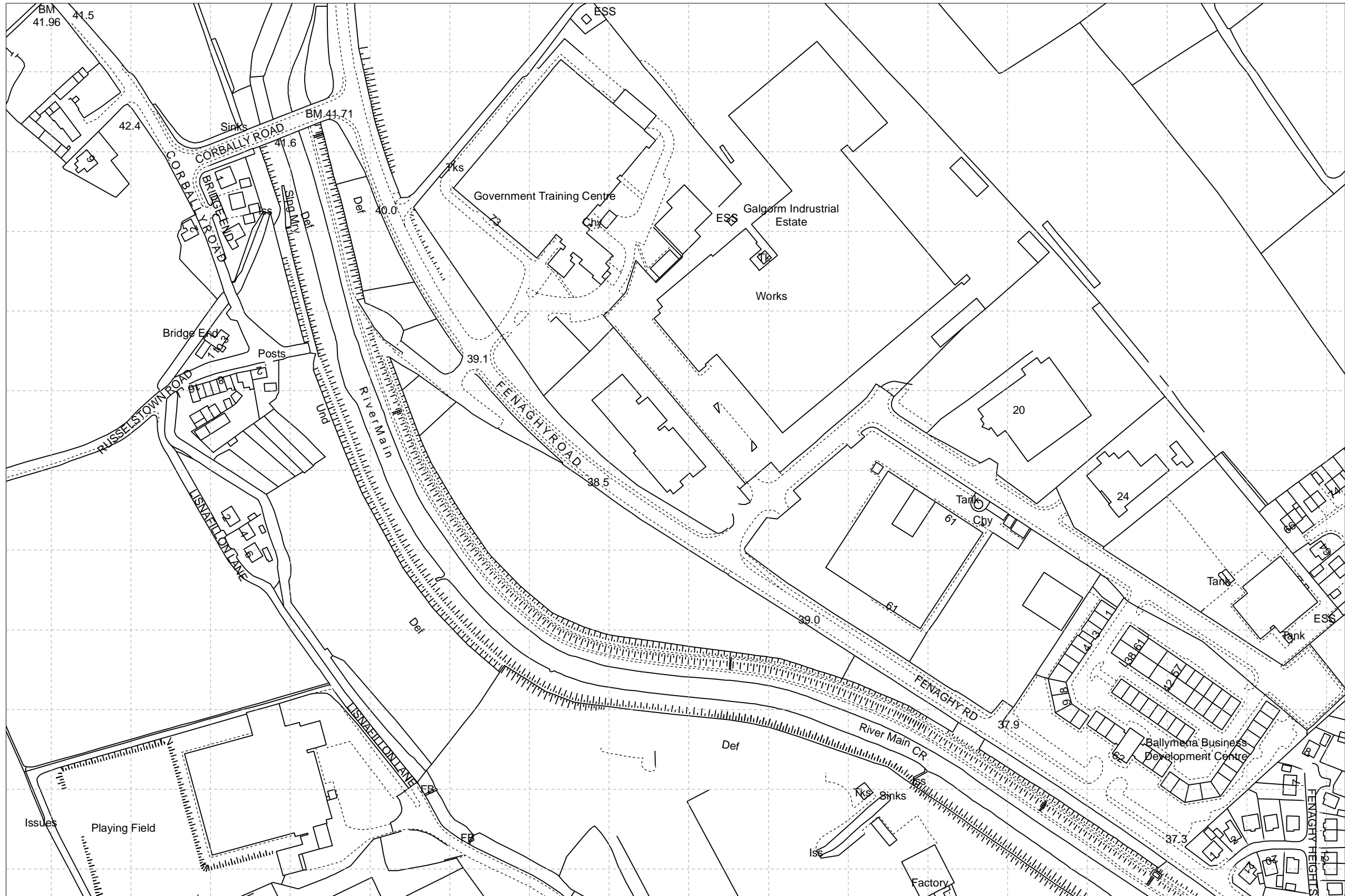
7. If you consider the draft Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the draft Plan Strategy sound.
8. We request the Council include this site within its Urban Capacity Studies going forward as a housing site in order to help ensure the Council has an adequate supply of housing land.

## **Appendix**

- A. Site Map

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307661  
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