

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

First Name **(Required)**

Last Name **(Required)**

Email

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)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

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)

(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-041

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.

Lightsource BP Comments extracted from PDF Response Form

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)

Whilst Lightsource BP believe the Draft Plan is Sound, we would like to have policy 9.3.14 am

“Whilst Lightsource BP believe the Draft Plan is Sound, we would like to have policy 9.3.14 amended as we believe it is misleading. The use of previously developed land for large scale solar farms is not practical as the size of the land required is often larger than any brownfield available. In addition, brownfield land is often within the zoned area and the cost is prohibitive for solar, competing against house builders or similar urban developers. Finally, we would like to make the point that the Draft Plan should elaborate more on the potential for Power Purchase Agreements (PPA). In considering how to promote Mid and East Antrim Council as an area to attract inward investment, the Draft Plan should reflect how renewable energy and solar in particular could play a role in this process. Increasingly foreign direct investment (FDI) companies wish to locate near to a secure supply of clean renewable electricity, many of whom have corporate policies on green energy and decarbonising. Currently, Lightsource BP operate 10 fully functional solar farms in N. Ireland. Two of the solar farms provide renewable energy privately to large energy users (Belfast International Airport and another to Brett Martin). These Power Purchase Agreements (PPAs) that have benefited both Belfast International Airport and Brett Martin, who are both large employers locally in Co. Antrim, should be given additional policy direction and protection. This type of Power Purchase Agreement (PPA) is a direct model for future energy supply projects within the Borough. PPAs can not only lower our regional reliance on fossil fuels but can also help our local indigenous companies to lower energy costs and be more competitive. It should be realised that many of our local manufacturing firms are not only in direct completion with other companies in a UK context, but are also in direct competition with sister companies in North America or Eastern Europe. Energy costs in the UK are amongst the highest in the EU and certainly in comparison to North America. The Draft Development Plan should make direct reference to the potential that solar PPAs have in providing clean, green energy across the Council area in the coming years. Solar farms are relatively quick to deploy, in comparison with other energy generation technologies, and we believe well sited solar farms can help meet local and national energy targets, without significantly impacting on local communities or the environment. In particular the Draft Plan could consider the innovative approach known as co-location, where both solar and wind turbines symbiotically co-exist. This is a highly sustainable use of existing infrastructure, with the solar and wind installations sharing grid infrastructure. Combining renewable resources and increasing the productivity of the existing infrastructure is a logical progression for the

solar industry. With reduced development costs and construction timeframes, coupled with shared use of existing infrastructure and operating costs, renewable co-location will shape the future development of renewables over the coming years. The Draft Local Development Plan, therefore could contain clear, targeted and focused objectives, which demonstrate the manner in which renewable forms of energy are to be encouraged. The use of renewable energy like solar, can stimulate jobs and reduce reliance on fossil fuels. The Council should be aspiring to become a green platform for both local business development and FDI companies”.