

**MID & EAST ANTRIM BOROUGH COUNCIL
LOCAL DEVELOPMENT PLAN 2030**

Draft Plan Strategy response



**Lands at Fenaghy Road, Galgorm
Ballymena**

December 2019

A Representation to the Mid and East Antrim Draft Plan Strategy (2030)

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1.0 Introduction

- 1.1 This representation has been prepared by TSA Planning on behalf of our client [REDACTED] [REDACTED] in respect of Mid and East Antrim Borough Council's published Draft Plan Strategy (DPS), for their Local Development Plan 2030.
- 1.2 This paper assesses the Economic Development Strategy for the Borough; specifically, Policy SGS6¹, and its supporting evidence base, justification and amplification text which we believe is unsound in its current form.
- 1.3 The report has been structured as follows: -
- 1.4 Section 2 sets out our consideration of the Economic Objectives, Growth and Development Strategy for the Borough; and their coherency with Policy RG1; the Economic Development Hierarchy, and Policy SFG11 of the Regional Development Strategy (RDS) 2035.
- 1.5 Section 3 sets out our consideration of the Strategic Allocation of Land for Economic Development set out at table 5.5 under Policy SGS6; its supporting evidence base, and our reasoning as to why we consider the allocation to be unsound in its current form.
- 1.6 Section 4 sets out our recommendations and alternative lands for Employment Use in Ballymena at Fenaghy Road Galgorm.
- 1.7 Section 5 sets out our conclusions.
- 1.8 We respectfully request this representation is heard by oral hearing at Public Examination Stage.

¹ Spatial Growth Strategy 6

2.0 Economic Objectives, Growth and Development Strategy - Coherency with Policies RG1, The Economic Development Hierarchy, and SFG11 of the RDS (2035).

2.1 As previously referenced, this section will provide our assessment of the coherency between the Economic Objectives, Growth and Development Strategy set out within the DPS, and our consideration as to if these accord with Policies RG1 and SFG11 of the RDS (2035).

Policy RG1 - Ensure adequate supply of land to facilitate sustainable economic growth

2.2 Policy RG1 of the RDS (2035) states that *to ensure Northern Ireland is well placed to accommodate growth in jobs and business there should be an adequate and available supply of employment land.*

2.3 The supporting text of Policy SGS1 at para. 5.1.9; para. 5.4.9 of the Economic Development Strategy, and the Proposal Aims for the Borough set out at para. 5.4.15 within the DPS state that the Council **will ensure there is a "generous supply"** of suitable land to meet the economic development needs within the Borough over the plan period (2017-2030).

Consideration

2.4 The approach referenced above by the Council to ensure there is a **"generous supply"** of suitable employment land over the plan period meets the requirements set out under Policy RG1 of the RDS (2035); as it promotes opportunity and choice of location which we fully support.

Policy SFG11 Promote economic development opportunities at Hubs

2.5 Policy SFG11 of the RDS (2035) states *when new development is being considered, the relationship and benefits between towns/cities in the clusters should be taken into account. The Main Hub and the higher performing town/city in the cluster should be considered first in the decision process.*

2.6 Table 5.2 of SGS 1 states the Spatial Growth Strategy will **"focus major population growth and economic development in the three main towns of Ballymena, Carrickfergus and Larne, strengthening their roles as the prime locations for business"**.

Consideration

2.7 We agree with this approach set out above and consider it appropriate to focus major population growth and economic development to the main Towns of Ballymena, Carrickfergus and Larne.

3.0 Para. 5.4.9 and SGS6 Table 5.5 Strategic Allocation of Land for Economic Development.

3.1 The justification and amplification text at Para. 5.4.16 which is aimed at justifying SGS6 and the allocation set out in associated Table 5.5 (see **TSA 1**) ties back to the strategic objectives in that it recognises the LDP growth strategy, and their *position in the top tier of the settlement hierarchy being the principal focus for economic development growth will be within Ballymena, Carrickfergus and Larne*. In regard to the RDS, this reflects the regional status of Ballymena and Larne as “Main Hubs” and Carrickfergus as a “Key Location”.

SGS6 Strategic Allocation of Land for Economic Development	
The allocation of economic development land (industry and business) will be distributed between the three main towns as follows:	
Table 5.5 Strategic Allocation of Land for Economic Development	
Main Town	Area (hectares)
Ballymena	51 ha
Carrickfergus	73 ha
Larne	43 ha
Borough Total	167 ha
These zonings will be complemented by Policy ECD2 Retention of Economic Development Land which aims to protect land in settlements currently or last used for economic development use.	

TSA 1 – Extract from Policy SGS6 of the DPS

3.2 However, whilst we consider the Strategic Economic Objective of the Plan to be sound and consistent with the RDS (2035) and SPPS (2015), it is clear the allocation presented at Table 5.5 is not reflective of the Economic Objectives, Growth and Development Strategy set out within the DPS previously referenced, and the allocation makes the employment strategy **unsound** in its current form against the following soundness tests:

- Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow;
- Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base; and
- Soundness Test CE4 – The DPD is reasonably flexible to enable it to deal with changing circumstances.

Detailed Response

- 3.3 The allocation presented at Table 5.5 affords the majority of the Employment Land Allocation over the plan period to Carrickfergus at 73 ha, while Ballymena and Larne have 51ha and 43ha respectively.
- 3.4 We believe the proposed allocation over the plan period presented at Table 5.5 of SGS6 has been inappropriately skewed by the misplaced belief set out at Para 5.4.9 of the DPS that all existing and undeveloped zoned industrial lands within the Borough are sufficient to accommodate the employment need over the plan period.
- 3.5 We set out below our assessment of the shortcomings of the Councils rationale/methodology for the allocation set out within the DPS, and evidence base including Technical Supplement 5 – Economic Development. We shall then present the changes we believe are necessary to make this element of the plan sound, along with our reasoned justification.

Para 5.4.9 and critique of the supporting Evidence Base for the Allocation

- 3.6 Para 5.4.9 states that the existing zoned and undeveloped sites indicated within the Economic and Industrial Land Monitor (2018) have been used as a basis for their allocation of Employment Land set out at Table 5.5 of SGS6, and that the Council consider these lands sufficient to accommodate the anticipated amount of employment floorspace over the plan period.
- 3.7 The above methodology has also been referenced within Technical Supplement 5 Economic Development which supports the DPS, and the allocation at Table 5.5. No other methodology or detailed calculations as to the need for each Town has been presented.
- 3.8 To provide no detailed technical methodology behind the allocation of Employment Land presented at Table 5.5, and to state that **the existing employment land is "sufficient"** to accommodate the employment land allocation over the plan period without the benefit of a Stage 3 ELEF assessment is unsound.
- 3.9 We set out why we consider the above unsound within our reasoned justification below.

Quantum of Floorspace required over the plan period

3.10 Para. 5.3.2 of the DPS sets out the population size of each of the towns within the Borough. These have been referenced below for clarity: -

- Ballymena – 29,467 persons;
- Carrickfergus – 27,903 persons; and
- Larne – 18,705 persons.

3.11 The above identifies that Ballymena has the highest population within the Borough, closely followed by Carrickfergus then Larne. We do not believe that the populations of the towns, relative to their role/function, population, accessibility and anticipated growth have been taken into consideration in the amended allocation.

TSA Proposed Revised Allocation

3.12 Having taken the above assessment into account, we consider the Employment Land Allocation presented at Table 5.5 under SGS6 **unsound** in its current form.

3.13 We have set out an adjusted Employment Land Allocation for the Borough below which is based upon an even percentage split between the total population (76,075 persons), and total employment land within Ballymena, Carrickfergus and Larne (167ha). This has been set out at **TSA 2** below for clarity.

Amended Employment Land Allocation Option –

Town	Current Allocation (ha)	Current % split of Allocation	Total Population split	% split of total population	Amended to even split between pop and land
Ballymena	51	30%	29,467	39%	65 (+14ha)
Carrickfergus	73	44%	27,903	37%	62 (-11ha)
Larne	43	26%	18,705	24%	40 (-3ha)
Total	167	100%	76,075	100	167

TSA 2 –Amended Employment Land Allocation

- 3.14 The above option should be utilised to ensure the allocation presented in Table 5.5 of SGS6 is found sound at Public Examination Stage.

Legacy Plan – The Ballymena Area Plan (1986-2001)

- 3.15 The Ballymena Area Plan (BAP) 1986-2001 oldest of the legacy plans is c.30 years old; which predates the zoning requirements/guidance set out within the RDS 2035 and para. 6.92 of the SPPS 2015. Para. 16.9 of the BAP states the following:

It is difficult to make an accurate assessment of the amount of land which will be required for industrial use in Ballymena over the plan period. While the availability of land will not generate industrial development, it is nevertheless essential that potential development is not constrained by a lack of zoned industrial land.

- 3.16 Taking account the current policy and site-specific circumstances, it may be the case that the previously zoned lands are no longer suitable for industrial development, so their zoning should not be followed through at the expense of other suitable and more appropriate lands.

Economic and Industrial Land Monitor - Ballymena – Woodside Road (including Raceview Road)

- 3.17 For example, Woodside is a c.63 ha (c.156 acre) site zoned for industrial uses within the Ballymena Area Plan (1986-2001). From review of the Industry section of the Ballymena Area Plan (para. 16.9); no reference is made to any evidence base, amenity or environmental factors which informed the sites allocation other than accessibility. The site has been identified a partially undeveloped industrial zoning within the DPS Industrial and Economic Land Monitor (IELM) 2018.
- 3.18 Mid and East Antrim Council, in their ILEM identify that 15ha of the zoning at Woodside Road (north west section) has remained undeveloped since its initial zoning, therefore has been accounted for in the revised Employment Land allocation for Ballymena set out in table 5.5 of SGS6. However, the Economic and Industrial Land Monitor has identified that the site is susceptible to flooding (see DfI Flood Map at Annex 1).
- 3.19 It is therefore our contention that under existing Regional Policy (which operates a precautionary approach to development in floodplains) that these lands would no longer be considered suitable for development, and the zoning is unlikely to be carried forward at Local Plan Policies Stage.

- 3.20 If this site were to be zoned for employment uses at Local Plan Policies Stage, the flood risk issues, and associated mitigation measures could potentially render any schemes to come forward on the site unviable. Accordingly, these lands could lie vacant for a number of years in spite of their zoning, and therefore not fulfil their requirement to accommodate 15ha of employment land over the plan period.

Consideration

- 3.21 Even though this is only one site out of the wider employment land portfolio monitored within the Borough, it undermines the statement presented at para. 5.4.9 that all existing undeveloped zoned sites are sufficient to meet the need over the plan period.
- 3.22 On this basis, para 5.4.9 is unsound in its current form, and it is important to ensure that the 122ha of employment land proposed by the DPS is allocated to the most appropriate locations, informed by suitable evaluation appraisals. It is likely this will involve completely new zonings and extensions to existing zonings to accommodate the necessary employment land allocation.
- 3.23 At this stage, we would present for consideration our clients lands at Fenaghy Road, Galgorm for assessment at Local Plan Policies Stage to meet the DPS Employment Land Requirement.

4.0 Lands at Fenaghy Road, Galgorm, Ballymena – Alternative site

- 4.1 Whilst we appreciate any extensions or new allocations of Employment Land are reserved for Local Plan Policies Stage; we feel it is expedient to make the Council aware at this stage that our client is committed to bringing forward 11ha of lands shown below at TSA 2 for economic development within the plan period (a Site Location Plan can be found at Annex 2).
- 4.2 As such, these lands are available and would assist in delivering the required range and choice of employment lands allocation for Ballymena over the plan period.

Site Context

- 4.3 The site comprises of 5No. agricultural fields, with a total site area of approximately 11ha. The lands are relatively flat to their frontage along Fenaghy Road and are contained by a low-level wooden fence and vegetation to their perimeter. No. 97 Fenaghy Road abuts the sites boundary to the west, whilst the wider site is located to the east of Fenaghy Road and immediately north of Galgorm Industrial Estate, Galgorm as shown below at TSA 3.



TSA 3 – Lands at Fenaghy Road, Ballymena

- 4.4 Galgorm Industrial Estate is located adjacent and immediately south of the site, which is predominantly occupied by Wrightbus and a variety of other Use Class B3 industrial uses. The Industrial Estate is zoned for industry within the Ballymena Area Plan 1986-2001 and will form part of the employment land allocation for Ballymena over the plan period.

Area Plan Context

- 4.5 The c.11ha site sits adjacent to the settlement limit for Ballymena; and immediately north of Galgorm Industrial Estate. As such, the site represents an appropriate and logical extension to; and does not mar the distinction between the settlement limit and countryside. This can be seen at Annex 3.

Planning and wider site history

- 4.6 There are a number of industrial areas surrounding the site which have been permitted to be extended and developed for industrial uses outside of the zoning at Galgorm; which would suggest the area is an attractive location for developers wishing to pursue locations for industrial investment in Ballymena.
- 4.7 The consents included an application submitted by The Galgorm Group for a 1,000sqm extension to their existing storage and distribution warehouse to the rear of their site on Corbally Road in 2017. The application details can be found below for reference.

Ref: LA02/2017/0616/F

Location: Lands located at 7 Corbally Road Ballymena

Proposal: Extension to Established Industrial Development providing additional floorspace for class B storage and distribution use as set out in Part B of the schedule to the Planning (Use Classes) Order NI 2015

Decision: Permission Granted

Date: 2nd November 2017

- 4.8 Wrightbus also submitted an Outline application in February 2017 under Ref: LA02/2017/0138/O for proposed a new industrial/commercial premises for the manufacture, development and repair of buses; car parking for 600 cars and a residential development. The application was withdrawn prior to being presented to Planning Committee as a refusal, with the main reason for refusal being its location outside of the settlement limit.
- 4.9 Even though the above referenced application was recommended refusal; it still shows there is a good level of interest for investment in this area from developers to accommodate industrial/employment uses.

Consideration

- 4.10 For the reasons set out above, we would respectfully request the Council retain Section 4 of this representation to inform the Local Plan Policies Stage; whereby the identified site would form a natural extension to the settlement limit of Ballymena and assist in delivering the employment land allocation identified in Section 3; and broadening the range and choice of employment land required within Ballymena over the plan period.

5.0 Conclusions

5.1 In conclusion, this representation has assessed the published Draft Plan Strategy 2030 in respect of its Strategic Economic Objectives, Spatial Economic Growth Strategy and Economic Development Strategy; and associated policies and amplification text; taking into account the tests of soundness set out in Development Plan Practice Note 6 – Soundness. The DPS is unsound when assessed against the following tests: -

- Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow;
- Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base; and
- Soundness Test CE4 – The DPD is reasonably flexible to enable it to deal with changing circumstances.

5.2 We consider the employment land allocation set out at SGS 6, Table 5.5 to be insufficient with regard to Ballymena and, accordingly, it does not carry through the strategic objectives set out in terms of providing a generous supply of employment land. This is as a result of the lack of a robust evidence base at this stage of the plan to establish that there is sufficient employment land to accommodate the expected employment growth over the plan period. To make the Plan sound we would recommend that the allocation of employment land for Ballymena is increased to a comparable allocation as Carrickfergus due to the similar size of settlements, and to **recognise Ballymena's role and function**.

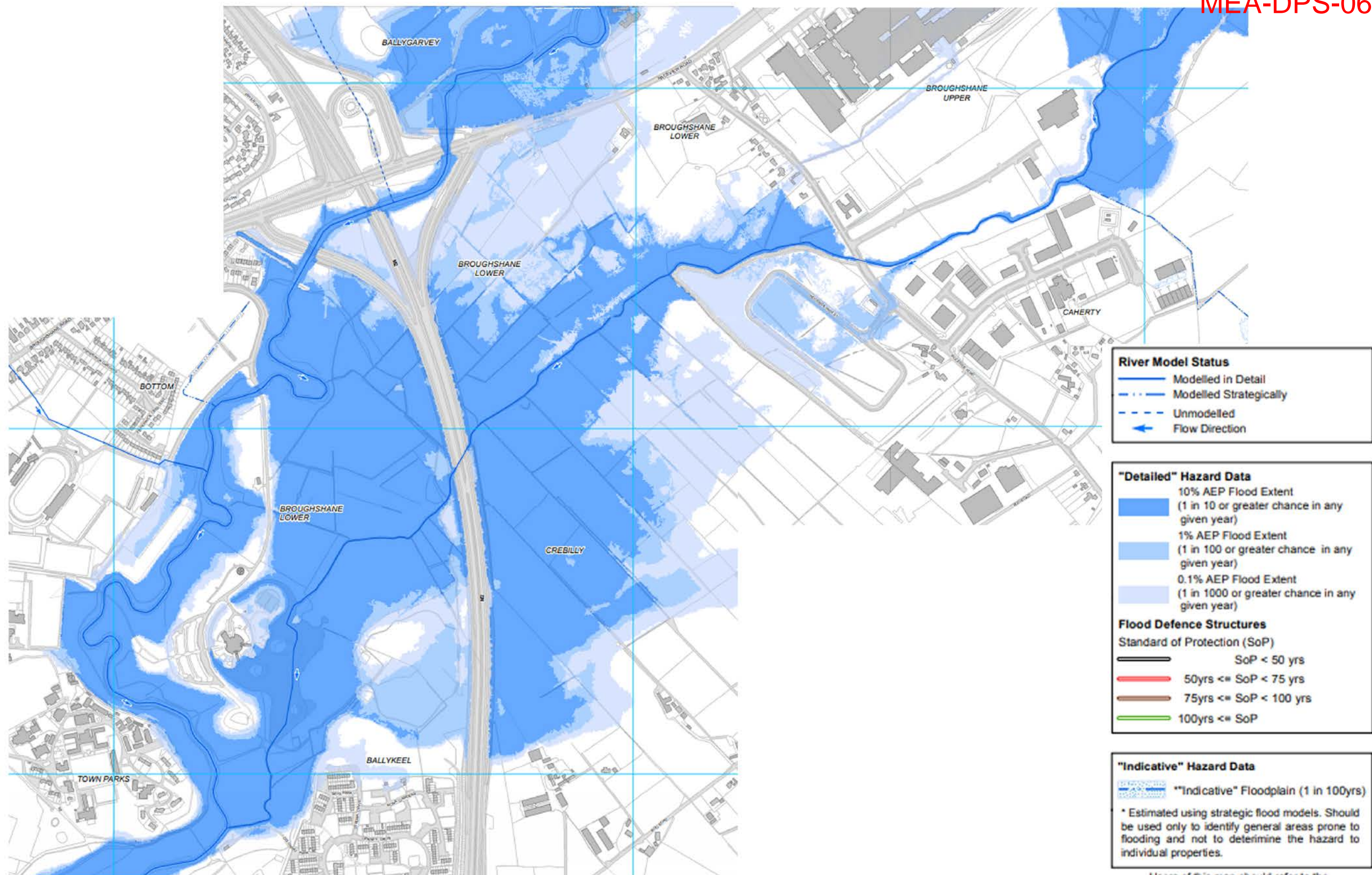
5.3 Whilst the DPS recognises Ballymena needs more employment land for range and choice, the allocation presented in the DPS appears to be predicated on the basis that there is sufficient land remaining in existing employment zonings, which it would seem are intended to be carried through at Local Policies Stage. This is premature, restrictive, and could undermine the Local Plan Policies Stage of the plan by prohibiting the ability to adequately identify and zone new lands, such as the lands identified at Fenaghy Road; and inevitably carry through unsuitable lands such as those we have identified at Woodside Industrial Estate that are prone to flood risk.

5.4 For the reasons set out within this representation we respectfully request the stated amendments are supported and brought forward within the adopted Draft Plan Strategy.



ANNEX 1

DFI FLOOD MAP





ANNEX 2

SITE LOCATION PLAN

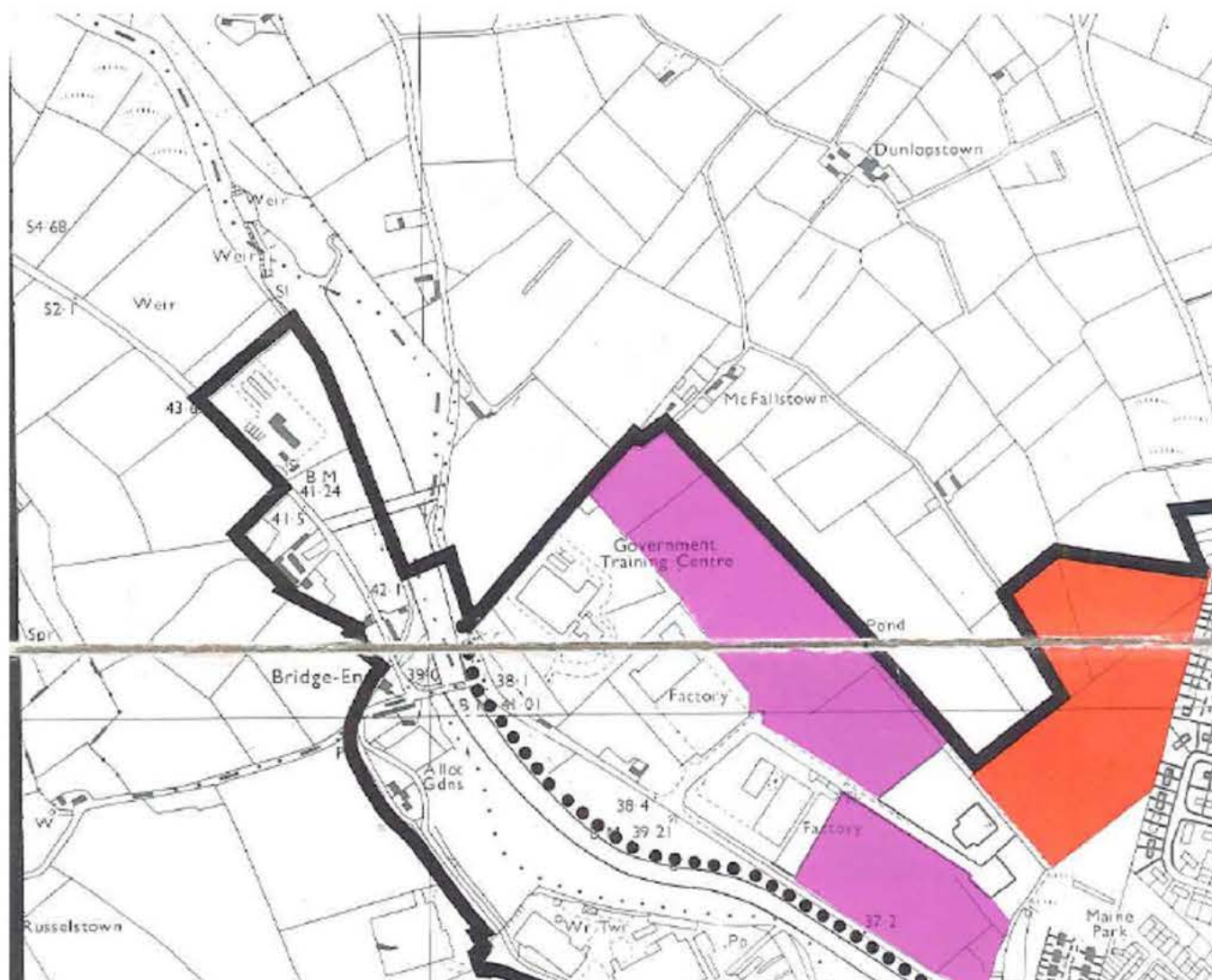
LANDS AT FENAGHY ROAD, GALGORM



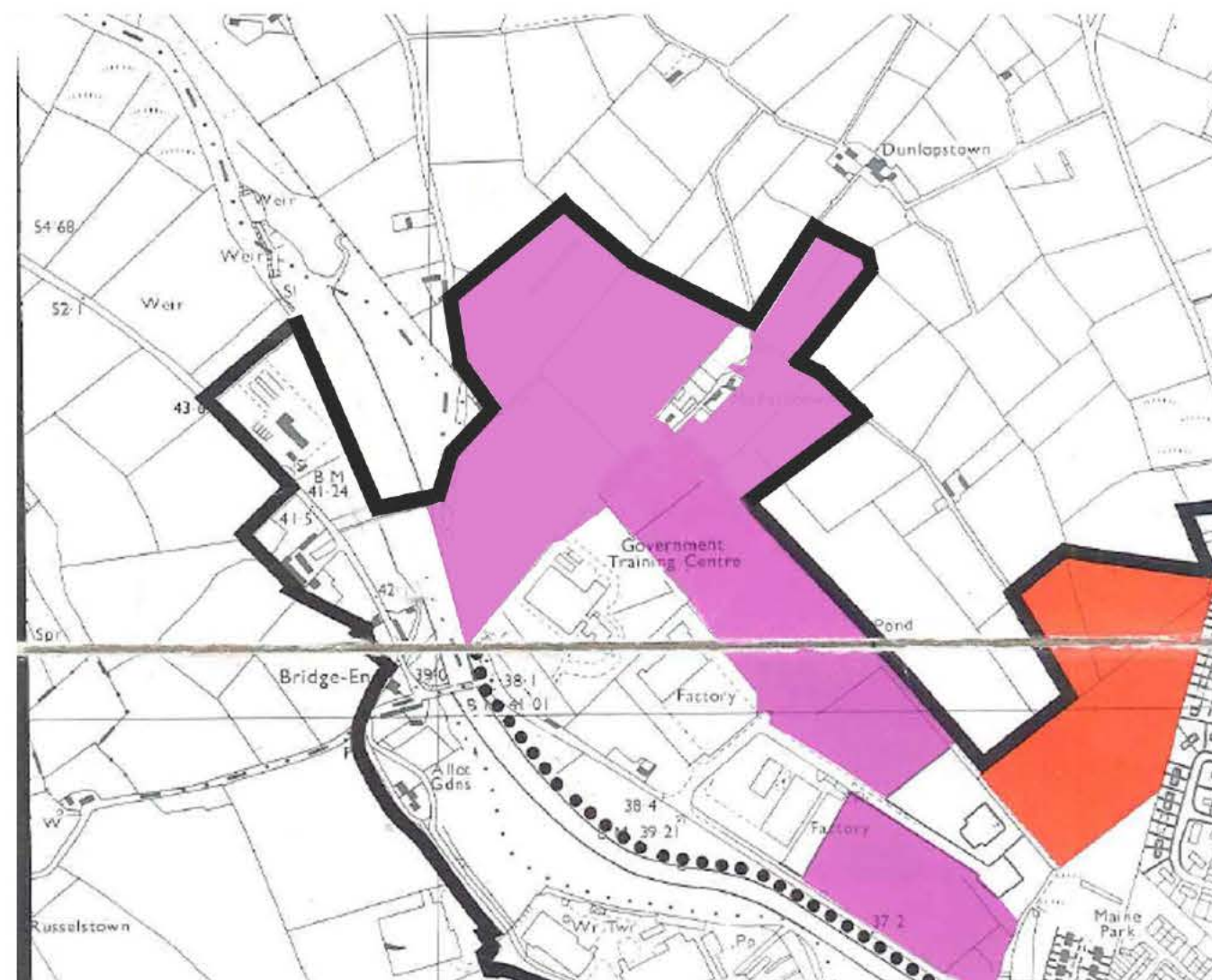
ANNEX 3

AREA PLAN EXTRACT

BALLYMENA AREA PLAN (1986-2001)



Existing Area Plan



Proposed Area Plan