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?

Please only tick one (Required)

- [x] Individual
- [ ] Organisation
- [ ] Agent

Q2. What is your name?

Title

Mr

First Name **(Required)**

Eamonn

Last Name **(Required)**

Loughrey

Email

eamonn@inaltus.com

Section C. Individuals

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Belfast

Postcode **(Required)**

Section D. Organisations

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.

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. **(Required)**

Client Contact Details

Title

First Name **(Required)**

Last Name **(Required)**

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

Q2. 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

In this section we will be asking you to specify which proposed modification you consider to be unsound. **This consultation is not an opportunity to add to previous representations or to make new comments on parts of the original draft Plan Strategy not subject to change.**

Note: Complete this section in relation to one proposed modification only. If you wish to inform us that more than one modification is unsound each additional response should be listed on a separate sheet.

If you consider that the proposed modification 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.pacni.gov.uk/sites/pacni/files/media-files/LDPexam%20-%20May%202017.pdf

Please note if you do not identify a test(s) your comments may not be considered by the Independent Examiner.

Which proposed modification are you commenting on?

This response should relate to only one proposed modification. If you wish to inform us that you consider more than one proposed modification is unsound, you can submit further representations by completing and submitting additional copies of this section.

Relevant Proposed Modification Reference Number (Required)

PM-004; PM-006; PM-042 and PM-058

(continued on next page)

Tests of Soundness **(Required – please tick all relevant tests of soundness)**

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?

☐ C4. Has the plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining Council's district?

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.

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

PM-006 the additional text for phase 2 allocations should include the word "normally" to cover for exceptions to the policy. This is required for flexibility.

PM-042 the policy should include District Centres as a location where B1 Business Use is allowed to be compliant with SPPS para 6.85.

PM-058 the policy for RET 3 should include a threshold for the requirement for a retail impact assessment. Requiring an applicant to demonstrate no adverse impact can be read as a retail impact assessment. SPPS para 6.283 allows Councils to set a threshold for RIAs, but does not envisage all proposals requiring one, particularly those in villages and small settlements. Such a requirement will deter investment and regeneration in small settlements.

I also note the PM-004 which changes the word 'sufficient' to 'generous'. I endorse this change.