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)



Organisation

Individual

Agent

Q2. What is your name?

Title

First Name (Required)

Last Name (Required)

Email

Г

Section C. Individuals

Address Line 1 (Required)

ine 2		
ine 3		
Town (Required)		

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)

Department for Communities Historic Environment Division

Your Job Title / Position (Required)

Senior Architect

Organisation / Group Address (if different from above)

Address Line 1 (Required)	
Nine Lanyon Place	
Line 2	
Town Parks	
Line 3	
Town (Required)	
Belfast	
Postcode (Required)	
BT1 3LP	
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 consultations on the LDP?	in relation to this response or future

Please only select one.

|--|

Both

Section F. Soundness

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

Note: <u>Complete this section in relation to one proposed modification only.</u> 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-161

(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.

Please see accompanying representation dated 25th February 2021

If you consider the proposed modification to be unsound, please provide details of what change(s) you consider necessary to make the proposed modification sound. Please be as clear and concise as possible.

Please see accompanying representation dated 25th February 2021

Signed:

Date:

25/02/2021



25th February 2021

Historic Environment Division submission

This representation relates to the Mid and East Antrim Borough Council, Local Development Plan 2030 Draft Plan Strategy, Schedule of Proposed Modifications, (January 2021) and the Addendum to the Draft Sustainability Appraisal.

Historic Environment Division (HED) has reviewed the Schedule of Proposed Modifications and Addendum to the Draft Sustainability Appraisal. The proposed changes made in response to issues raised in our representation on the draft Plan Strategy (MEA-DPS-008) are welcomed and are considered to be 'sound'.

Technical Supplement 1 Monitor & Review

The proposed modification (PM-161) to Monitoring Indicator 26, to include monitoring of approved demolition of listed buildings, contrary to the advice of DfC HED, is welcomed.

To demonstrate the effectiveness of the Plan Strategy to achieve its objectives for the historic environment, as referred to in our representation and to provide the basis to trigger any requirement to amend the strategy, policies and proposals, HED also considers it is critical to monitor:

 Planning decisions determined against statutory consultee advice and/or recommendations throughout the Plan period.

HED seeks to clarify that this monitoring indicator while pertinent to Monitoring Indicator 26 as outlined in our representation, is also applicable to <u>all</u> planning applications impacting the historic environment which require HED statutory consultation advice. In the interests of providing sound evidence, to demonstrate the effectiveness of the plan to achieve its historic environment objectives, through annual reporting and the five year review, HED strongly recommends its inclusion, within the scope outlined above, as a key and robust monitoring indicator.

We defer to our representation, for issues raised in relation to the historic environment which have not been addressed as part of the Proposed Modifications Consultation.

HED has welcomed the consultation and engagement with the Council through the plan process to date. We look forward to working with them through the next stage of the plan process, the Local Policies Plan for their area.