

The Dunadry Community Association



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On behalf of Dunadry Community Association, we would like to thank you for our inclusion at the launch of the Local Development Draft Plan Strategy, and the time afforded to us at our recent meeting with Mr Simon Thompson on 7th August. We submit this by way of our response.

We are very much in favour with the ethos of a plan led system, and hope this will lead to improvements to a system that we have had significant involvement with in the twenty two year history of our association. As an overall summary, we are happy with the content of the Draft Plan Strategy, however there are many areas that we feel are not sufficiently robust. These include areas that are very subjective and open to wildly varied interpretation, and as such open to abuse facilitating decisions counter to the ethos of the document. This is something we have had experience of in the past. Please find below some examples with suggestions as to how the document might be made more robust.

Page 11 Positive Planning Note: Adding Value

“...proposals will therefore be required to accord with the provisions of the plan unless, exceptionally, other material considerations indicate otherwise”

A ‘get out clause’ such as this seriously undermines the strength of any plan and is unwelcome. At the very least, some sound and reasoned examples of what might be considered as other exceptional material considerations should be included.

Page 19 paragraph 1.10

“...Council will bring forward, as appropriate, a range of supplementary planning guidance documents to support the implementation of the LDP.”

In the past such supplementary documents have been allowed to have been ignored by planners in the decision making process. For example planning circular PC 03/07 published in August 2007 by Anne Garvey. What will be different in future to prevent such supplementary planning guidance documents from being ignored?

Page 21 How did we get here? Paragraph 1.20

This states previous consultations contributed positively to the preparation of the Council’s Preferred Options Paper. By what process was this positive contribution assessed? Our past experiences have almost without exception led to our expressed views not being taken on board, and as such our view of such consultations has not been positive.

Page 38 Legacy Development Plans paragraph 2.31

It is difficult to consider how the Antrim Area Plan 1984-2001 and its alterations can be determined to have been “an important baseline for the Council in the development of the new LDP” when this plan, and objections quoting this previous plan, were largely ignored.

Page 65 Spatial Growth Strategy paragraph (e)

“Sustain and maintain our rural area through the accommodation of suitable small-scale housing and employment opportunities in our hamlets and in the countryside”

Without a definition of what is “suitable” or “small-scale, such a statement is so subjective as to be of no use whatsoever. Indications of numbers, housing types, density, need to be included otherwise anyone can make a claim that in their view anything can be judged as suitable or small-scale.

This is only one example of language used throughout the document, with terms such as “properly located” “well designed” “of a scale and nature appropriate to the location” all of which, without detail or definition, can be interpreted very differently.

Page 135 Housing Growth Allocation

Our initial thoughts on the allocated figure of 10 for Dunadry was positive. However, with a total indicated on the table of 9750 and the statement in SP 4.2 “...Council will seek to facilitate the delivery of **at least** 9750 new homes...” it is clear the allocated figures for each area are a minimum, with no indication of a cap or maximum. This sheds a different light on the matter and offers no reassurance or comfort. Antrim Area Plan 1984 – 2001, Alteration No.1 1991, Limits of Development for Hamlets told us “*The development limit incorporates some 5 hectares of potential development land which is likely to accommodate some 30 dwellings*” In the period to 2010 there was approval of 229 dwellings, an increase of some 760% of what was foreseen in the plan. This demonstrates the frailty of such nominal figures being included in this table. Perhaps some thought should be given to including figures for ‘target’ and ‘maximum’.

Page 139 Affordable Housing paragraph 7.21

In Dunadry, we have had recent experience of N.I.H.E. manipulating a Housing Needs Assessment through their interpretation of Common Landlord Areas, and by the asking of leading questions from those on waiting lists. ~~It~~ what way will Council scrutinise these Housing Needs Assessments to prevent further such potential abuse?

Page 148 Policy DM 18A Farm Dwellings

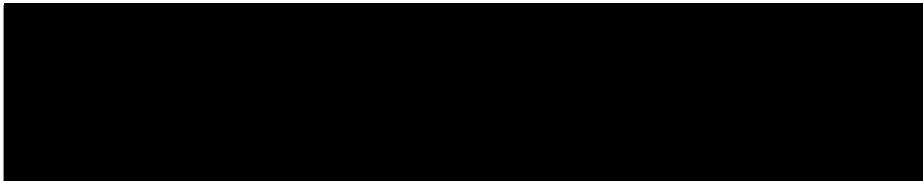
The means of determining if a land owner is actively engaged in farming must be more robust, and have more means of demonstration over and above simply being in possession of a DARD number. Surely it would not be unreasonable to ask for audited accounts of such farming activity in recent years?

Where a field or piece of land does not have any existing farm buildings with which an application can cluster, surely it is totally unacceptable for such an application to be located to cluster with bordering residential dwellings?

If a farmer demonstrates a need for a farm dwelling, then there must be means to prevent the fortuitous granting of permission being converted to a quick and profitable sale? This must be facilitated by means of conditions placed on such planning permission being granted.

All of the above points in this letter have been raised with the hope of allowing Council to add to the integrity of the Draft Plan, with the end result being a more robust document. Again much of the above content has come about as a result of bitter past experiences, where previous planning policy documents were not sufficiently robust to offer the levels of protection against inappropriate development, character changing development, and development out of scale with the area in which it was situated. Naturally we are keen to prevent reoccurrence, and as such are eager to participate and be included in all stages of the development of the Local Development Plan.

Yours sincerely.



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Hon. Secretary