

Draft Plan Strategy
Response Form

Consultation Period

Antrim and Newtownabbey Borough Council has published its draft Plan Strategy, the first formal stage of the new Local Development Plan 2030, for public consultation.

The draft Plan Strategy is the first of two documents, which comprise the Local Development Plan 2030. It has been developed following extensive engagement with the public, stakeholders and our elected Members, including the publication of our Preferred Options Paper.

The draft Plan Strategy sets out how our Borough will grow and change up to the year 2030. It puts forward our Plan Vision for the future. It also contains a Spatial Growth Strategy indicating at a strategic level where growth should go in the Borough. It also sets out a range of Strategic Policies and Detailed Management Policies, which together will guide future planning decisions.

The draft Plan Strategy is published for formal public consultation over an 8-week period and the Council is inviting the submissions of representations, beginning on Friday 26 July and closing on Friday 20 September 2019 at 5pm.

The submission of representations in relation to the Council's draft Plan Strategy provides an opportunity for the public to influence the policies and proposals for the future planning and development within Antrim and Newtownabbey.

Please note that representations received after the closing period will not be accepted and will be subsequently returned.

Published alongside the draft Plan Strategy are a range of assessments including Sustainability Appraisal (incorporating the Strategic Environmental Assessment), a draft Habitats Regulation Assessment and an Equality (Section 75) Screening and Rural Needs Impact Assessment Report. These assessments are also subject to public consultation during the formal public consultation period closing on Friday 20 September 2019 at 5pm.

Copies of the draft Plan Strategy and all supporting documents are available to view and download from our website at:

www.antrimandnewtownabbey.gov.uk/draftplanstrategy.

Copies of all documents are also available for inspection at the Council Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8.30am to 5pm. Hard copies of the draft Plan Strategy are also available upon request.

Soundness Testing

A key feature of Northern Ireland's new Planning System is 'Soundness' which requires the draft Plan Strategy document to be tested at Independent Examination (IE) in terms of content, conformity and the process by which it has been prepared. Derived from established practices in England and Wales, it is considered that 'Soundness' testing will provide a more effective basis for examining Local Development Plans and consequently contribute towards a shorter IE process.

The purpose of the IE is to determine if the draft Plan Strategy satisfies statutory requirements and is 'sound'. The presumption will be that the draft Plan Strategy is 'sound' unless it is shown to be otherwise as a result of evidence considered at the IE stage.

The tests of soundness are based upon three categories which relate to how the draft Plan Strategy has been produced, the alignment of the document with central government regional plans, policy and guidance and the coherence, consistency and effectiveness of the content of the draft Plan Strategy. The tests of soundness are set out below:

	Procedural Tests				
P1	Has the DPD* 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?				
Р3	Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?				
P4	P4 Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?				
	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 DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross-boundary issues are relevant it is not in conflict with the DPDs of neighbouring Councils.				

	There are clear mechanisms for implementation and monitoring. It is reasonably flexible to enable it to deal with changing circumstances.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.

Further information on Soundness can be found in Development Plan Practice Notes published by the Department for Infrastructure (Dfl). Of particular relevance is Practice Note 6 'Soundness' (Version 2) and Practice Note 9 'Submission and Handling of Representations', both are available to view at https://www.infrastructure-ni.gov.uk/publications/development-plan-practice-notes.

In addition, the Planning Appeals Commission has also produced guidance entitled 'Procedures for Independent Examination of Local Development Plans' available at https://www.pacni.gov.uk/procedural-guides.

Making a Representation

As the main purpose of the IE is to determine whether the Development Plan Document (DPD) is 'sound', any person(s) wishing to make a representation to any part of the Plan should do so on the grounds of soundness. Any representation proposing a change to the Plan must demonstrate why the document is not sound having regard to the tests of soundness. Every representation should say precisely how the Plan should be changed in order to achieve soundness and should be supported, succinctly, by all the evidence thought necessary to justify the proposed change. Once the public consultation period has closed, there will be no further opportunity to submit information unless the Commissioner requests it.

Where several people share a common view on how the draft Plan Strategy should be changed, we encourage you to co-operate with each other, pool resources and make a single representation, for example, a local community group.

Those who make representations to the draft Plan Strategy should state whether they wish to have their representation considered at IE in writing or as an oral hearing. Unless people specifically request an oral hearing, the Commission will proceed on the basis that you are content that your representation will be considered in writing. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orally or in written form.

Points to Remember:

- Representations will be made publicly available for inspection at the Council's Offices and online for counter-representations;
- Complete all relevant sections of the response form;
- Clearly state why you consider the draft Plan Strategy to be 'unsound', having regard to the soundness tests;
- There will be no further opportunity to submit information once the public consultation period closes unless the Commissioner requests it;
- We would encourage you to submit separate forms for each representation you wish to submit;
- Every representation should say precisely how the draft Plan Strategy should be changed in order to achieve soundness;
- Representations should be supported, succinctly, by <u>all</u> the evidence thought necessary to justify the proposed change; and
- Clearly, state whether you wish for your representation to be heard orally or in writing.

Submitting Your Representation

We recommend that you submit your representation via our on-line consultation hub, at www.antrimandnewtownabbey.gov.uk/consultations, as this is the most efficient way to make a representation.

However, you can make a representation by completing this form and returning to us by **5pm on Friday 20 September 2019** either by email or by post.

Representations received after the closing period will not be accepted and will be subsequently returned.

What Happens Next

When the consultation has closed, the Forward Planning Team will collate the representations received and as soon as reasonably practicable, publish these online for a further 8-week period of consultation to allow counter-objections to be made. The representations will also be available for public inspection during this period at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to 5pm.

Once this period of counter-representations has closed, the Forward Planning Team will collate the counter-representations and publish these online. They will also be made available for public inspection at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to

5pm. The next anticipated step will be for the Council to contact the Department for Infrastructure to request an Independent Examination of the draft Plan Strategy.

Contact Us

For further assistance, please contact the Forward Planning Team at Mossley Mill, Newtownabbey:

By Post – Forward Planning Team

Mossley Mill

Carnmoney Road North, Newtownabbey

BT36 5QA

By Email - planning@antrimandnewtownabbey.gov.uk

By Telephone – 0300 123 6677

SECTION A – DATA PROTECTION AND CONSENT

Antrim and Newtownabbey Borough Council complies with the General Data Protection Regulation (GDPR) by producing a specific Local Development Plan Privacy Notice, which lets you know how we manage any personal information we receive from you. It contains the standards you can expect when we ask for, or hold, your personal information and an explanation of our information management security policy.

The Local Development Plan Privacy Notice can be found on our website at www.antrimandnewtownabbey.gov.uk/gdpr/planning-gdpr/.

Please note that when you make a representation (or counter-representation) to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the Council's website.

Copies of all representations will be provided to the Dfl and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for Independent Examination. A Programme Officer will also have access to this information during the IE stages of the Plan preparation

Dfl, the Programme Officer the Independent Examiner will, upon receipt, be responsible for the processing of your data in line with prevailing legislation.

- 1. Please tick to confirm that you have read and understood the Council's Local Development Plan Privacy Notice.
 - I confirm that I have read and understood the Local Development Plan privacy notice and I give my consent for Antrim and Newtownabbey Borough Council to hold my personal data for the purposes outlined.

You can contact the Council's Data Protection Officer via:

Post - Antrim Civic Centre, 50 Styles Way, Antrim BT41 2UB

Email - DPO@antrimandnewtownabbey.gov.uk

Phone - 028 9446 3113

SECTION B - YOUR DETAILS

2. Please specify if you are responding as an individual, as an organisation, or as an agent acting on behalf of an individual, group or organisation?

If you are responding as an agent or representing an organisation you will be the main point of contact for your client/organisation.

(Please select only one item)

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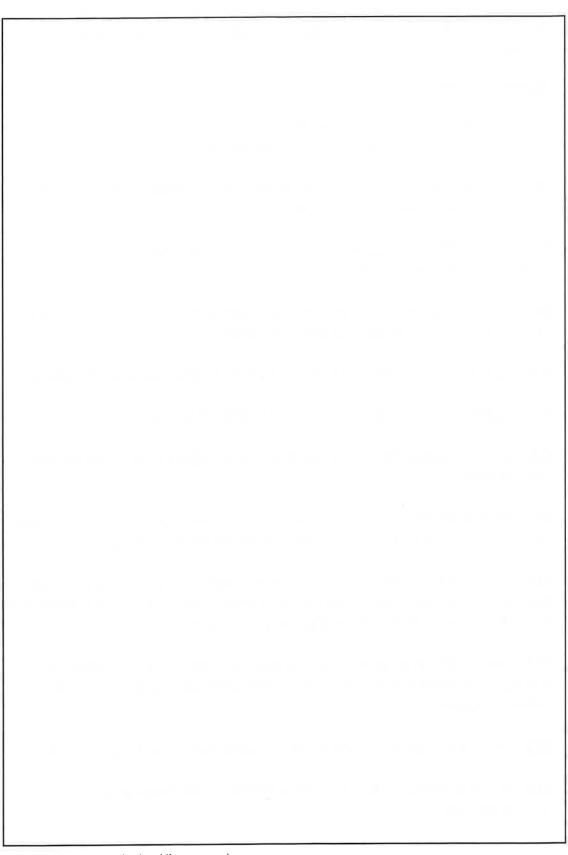
□ Organisation

2	Personal Details	Agent Details (If Applicable)
Title		Mr
First Name		Matthew
Last Name		Kennedy
Job Title (where relevant)		
Organisation (where relevant)		MKA PLANNING
Client Name (where relevant)		Mr Denis Mc Henry
Address		32 Clooney Terrace Waterside Derry
Post Code		BT47 6AR
Telephone Number		02871311511
Email Address		matt@mkaplanning.co.uk admin@mkaplanning.co.uk

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SECTION C - REPRESENTATION	

Your comments should be set out in full. This will help the Independent Examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

to	do so.			
3.	To which part of the draft Plan Strategy does your representation relate?			
	i) Paragraph Number:			
	ii) Policy Heading: Spatial Growth Strategy and Housing Growth and			
	Strategic Policy (SP) Paragraph Number:			
	SP1-6(d), SP4-3			
	Detailed Management Policy (DM) Paragraph Number:			
	iii) Page Number in Document: <u>65 and 135</u>			
	iv) Proposal Map (if relevant state location):			
4.	Do you consider the draft Plan Strategy to be: □ 'Sound' (i.e. support)			
	□ 'Unsound' (i.e. object)			
5.	If you consider the draft Plan Strategy to be 'SOUND' and wish to support the draft Plan Strategy, please set out your comments below.			
	Please see attached document			



(Continue on a separate sheet if necessary)

6. If you consider the draft Plan Strategy to be 'UNSOUND' please identify which test(s) of soundness your representation relates to having regard to the Department for Infrastruture's published Development Plan Practice Note 6 'Soundness' (Version 2). **Soundness Tests:** □ **P1** - Has the DPD¹ been prepared in accordance with the Council's timetable and the Statement of Community Involvement? $\ \square$ **P2** - Has the Council prepared its Preferred Options Paper and taken into account any representations made? \square **P3** - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment? □ **P4 -** Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD? 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 DPD had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining Council's district? CE1 - Does the DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross-boundary issues are relevant it is not in conflict with the DPD's of neighbouring Councils? CE2 - Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base? ☐ **CE3 -** Are there clear mechanisms for implementation and monitoring? CE4 - Is it reasonably flexible to enable it to deal with changing circumstances?

¹ Development Plan Document (DPD) - Comprises of the draft Plan Strategy

Details

7. Please give details of why you consider the draft Plan Strategy to be **'UNSOUND'** having regard to the test(s) you have identified above. Please be as concise as possible.

<u>Please Note:</u> Your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. This representation will be considered during the IE and here will be no further opportunity to submit information unless the Commissioner requests it.

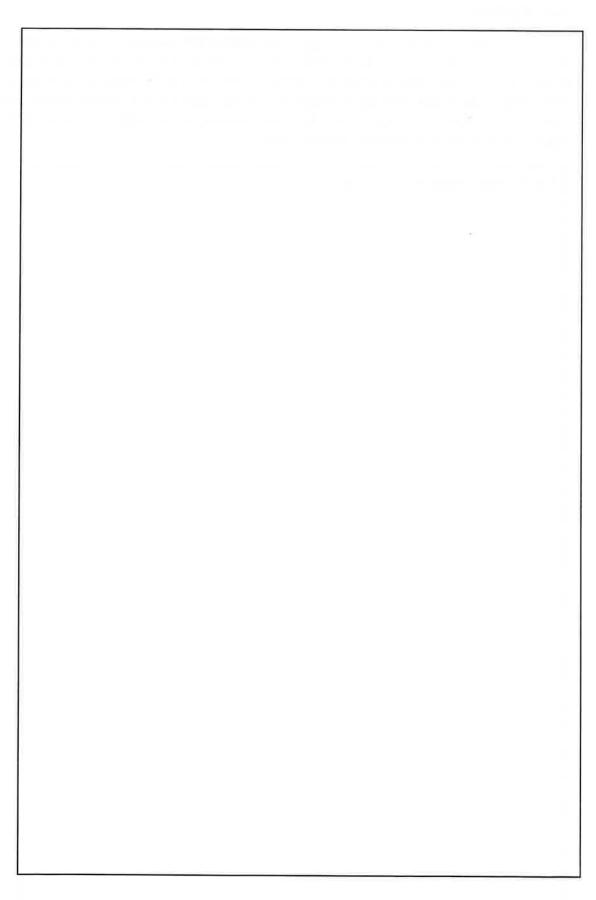
Please see attached do	cument	

(Continue on a separate sheet if necessary)

Modifications

8. If you consider the draft Plan Strategy to be 'UNSOUND', please provide details of what, if any, modifications do you think should be made to the section, policy or proposal which your representation relates to? What specific modifications do you think should be made in order to address your representation? Please briefly state how your proposed alternative would meet the requirements of the Sustainability Appraisal and other published assessments.

Please see attached document				



(Continue on a separate sheet if necessary)

9.	If you are seeking a change to the draft Plan Strategy, please indicate how you would like your representation to be dealt with at Independent Examination:					
	<u>Please Note:</u> Unless you specifically request an oral hearing, the Commission will proceed on the basis that you are content to your representations considered in written form only. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orall or not.					
	Please select or	nly one item;				
☐ Written Representation						
	₫ Oral Hec	ıring				
	Signature:					
	Date:	20/09/2019				

Thank you for your response.

RE: ANTRIM AND NEWTOWNABBEY BOROUGH COUNCIL'S DRAFT PLAN STRATEGY CONSULTATION 2019

REPRESENTATIONS TO ANTRIM AND NEWTOWNABBEY BOROUGH COUNCIL'S DRAFT PLAN STRATEGY

ON BEHALF OF

Mc Henry Brothers (Ireland) Ltd



AUTHOR

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DCA, Dip TP, MRTPI



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1.0 <u>Introduction</u>.

1.1 This representation is submitted on behalf of Mc Henry Brothers (Ireland) Ltd, landowners within the village. This representation sets out the aspects of the Antrim and Newtownabbey Council (ANC) Draft Plan Strategy (dPS) which we consider to be either sound or unsound.

Dunadry - Designation as a Village within Settlement Hierarchy.

- We support the dPS's designation of Dunadry as a village within the settlement hierarchy and believe its designation is sound and meets the tests for soundness set out in *Development Plan Practice Note (DPPN) No. 6 - Soundness*.
- 1.3 We have previously wrote to the Council in support of Dunadry's designation as a village in the settlement hierarchy in ANC's Preferred Options Paper (POP). We believe that the reasoning set out in that representation remains valid for the dPS and we append this representation at Appendix MKA1.

Dunadry - Spatial Growth Strategy.

- 1.4 We consider that a number of aspects of the dPS are unsound. Certain policies contained within the dPS do not satisfy the tests of soundness as set out in the relevant legislation and guidance notes and in particular DPPN No.6.
- In the POP the Council's Spatial Growth Strategy (SGS) set out in relation to villages at paragraph 4.119 (Page 76) that it should:

Sustain and maintain the role of our villages as local service centres providing opportunities for housing and employment taking account of the benefits of accessibility to our key transport routes.

(bolding - my emphasis)

1.6 In the dPS criteria (d) relating to villages has been amended to state:

Sustain and maintain the role of our villages as centres providing opportunities for housing and employment of an appropriate scale and character to individual settlements.

- 1.7 No explanation has been provided in the dPS why the village criteria in the SGS has been altered between the dPS and the POP or why accessibility to our key transport routes has been omitted as a factor for consideration. This revised criteria (d) appears to have reduced the weighting given to Dunadry in the allocation of housing. The advantages of Dunadry in terms of its accessibility to key transport routes and Strategic Employment Locations (SEL's) appears to have been given little weight. This is surprising considering that at SP 1.6 it is stated that it is the SGS "....that sets out how future growth of housing and employment will be accommodated within our Borough." (Page 63)
- 1.8 Revised criteria (d) in the dPS is unsound and fails the following tests of soundness -
 - Test CE1 as it is not a coherent strategy from which its policies and allocations logically flow.
 - Test CE2 as the strategy policies and allocations in relation to Dunadry are not realistic, are inappropriate, have not considered the relevant alternatives and are not founded on a robust evidence base.
 - Test CE3 as it fails to take into account policy and guidance issued by the
 Department in relation to the Regional Development Strategy (RDS) and
 various PPS's in relation to the provision of new housing and accessibility to
 key transport routes.
- 1.9 We request that Criteria SP 1.6 (d) be amended to state:
 - (d) Sustain and maintain the role of our villages as centres providing opportunities for housing and employment, of an appropriate scale and character to individual settlements, taking account of the benefits of accessibility to our key transport routes.
- 1.10 This alteration to criteria (d) of the SGS will allow Dunadry to get a significantly higher weighing in terms of the settlement hierarchy and a greater allocation of housing.

Dunadry - POP and dPS Allocations of Housing Growth.

1.11 The Council's POP's Paper sets out at Table 10 (reproduced below) - Options for the allocation of housing growth for Settlements in ANC and in particular, Dunadry:

Table 10: Options for the altocation of housing growth

Location	Option 1	Option 2	Option 3	Option 4
Metropolitan Newtownabbey	4,400	4,400	4,400	4,400
Antrim	3,500	3,500	3,500	3,500
Ballyclare	1,600	1,800	1,600	1,890
Crumlin	650	755	650	490
Randalstown	650	755	650	560
Ballynure	175	90	135	25
Ballyrobert	80	55	85	80
Burnside	150	110	170	150
Doagh	200	140	220	275
Dunadry	60	45	70	80
Parkgate	60	60	95	10
Straid	25	35	55	0
Templepatrick	280	145	220	220
Toome	120	60	100	360
Hamlets	300	300	300	300
Countryside	750	750	750	750
Total	13,000	13,000	13,000	13,000

Source: ANC POP.

- 1.12 The various options for Dunadry set out in the POP varies from 60 units in Option 1,45 units in Option 2, 70 units in Option 3 and 80 units in Option 4.
- 1.13 The POP indicated that Option 1 was the Council's preferred option. Option 1 proposed 60 dwelling units for Dunadry.
- 1.14 Since the POP, the dPS reduced the proposed housing growth allocation from 13,000 to 9,750 units. This is a reduction of around 25 per cent in the proposed allocation. Surprisingly, the housing growth allocation for Dunadry has been reduced from the proposed 60 units in Option 1 to 10 units in the dPS. This is a reduction of around 83 per cent. No explanation is provided within the dPS to justify this significant reduction for Dunadry.
- 1.15 Table MKA1 below has taken part of Table 6 at SP 4.3 of the dPS and compared it with Option 1 of the POP. We have set out at the third column the percentage decrease in the housing allocation to the various settlements from the POP Option 1 to the allocation in the dPS.

<u>Table MKA1 – Settlement Housing Growth Allocations – POP, dPS and Percentage</u>
Changes.

LOCATION	POP OPTION 1	ALLOCATION IN dPS	% DECREASE
Metropolitan	4,400	3,900	11.36%
Newtownabbey			
Antrim	3,500	2,750	21.42%
Ballyclare	1,600	1,100	31.25%
Crumlin	650	350	46.15%
Randalstown	650	350	46.15%
Ballynure	175	60	65.71%
Ballyrobert	80	35	56.25%
Burnside	150	50	66.66%
Doagh	200	75	62.5%
Dunadry	60	10	83.33%
Parkgate	60	10	83.33%
Straid	25	5	80%
Templepatrick	280	100	64.28%
Toome	120	55	54.16%
Hamlets	300	150	50%
Countryside	750	750	0%
TOTAL	13,000	9,750	25

- 1.16 Dunadry, suffers one of the greatest reductions in housing allocations. In terms of the percentage of the overall growth allocation in the POP had originally been allocated 0.46 per cent. However, the percentage of the allocation to Dunadry in the dPS is now only 0.1 per cent.
- 1.17 We are unaware of the reasoning within the dPS behind this dramatic reduction in the housing growth allocation to Dunadry from 60 to 10 units. No clear explanation is provided for this reduction. The village can hardly be "sustained" with such a limited allocation. The dPS Sustainability Appraisal (SA) also offers no explanation for the reduction. The SA consistently states that "a variety of household types and sizes" should be available. However, it fails to acknowledge the difficulties villages such as Dunadry with an allocation of only 10 units will face in trying to provide this variety. Page 4 of the SA acknowledges that the average household size is reducing across the Council area and the need to plan for one and two person households is increasing. However, the SGS allocation for Dunadry does not appear to take these factors into account.

Accessibility of Dunadry to Key Transport Corridors and Strategic Employment Locations.

- 1.18 In terms of accessibility Dunadry is strategically located in relatively close proximity to Antrim town centre and has the A6 Protected Route running through it.
- 1.19 Dunadry is also highly accessible to the key transport corridors, namely:
 - 4km from M2/ North West Key Transport Corridor.
 - 10.2km from Northern Key Transport Corridor.
 - 12km from Eastern Seaboard Key Transport Corridor.
 - 5km from Ballymartin Park and Ride.
- 1.20 Dunadry is also highly accessible to the two Strategic Economic Locations (SEL's) identified at Belfast International Airport (BIA) and at Nutts Corner. The dPS points out that there are over 4,000 employees already working at BIA. Dunadry is also highly accessible to the four zoned SEL's in Antrim town.
- 1.21 Dunadry's strategic location, high environmental quality and peaceful and secluded character makes it's a highly attractive choice for housing for potential executives and employees coming to work in BIA, Nutt's Corner, Antrim town centre or the other Antrim SEL's.
- 1.22 In this context, the POP allocation of 60 units to Dunadry occurred despite the fact that Nutt's Corner had not been designated as an SEL at that stage. In the dPS Nutt's Corner has now been designated as a rural SEL. Surprisingly, the growth allocation to Dunadry has been dramatically reduced.
- 1.23 As a rural SEL Nutt's Corner employees will have to live in the nearby settlements.

 BIA/ SEL employees have to live in the nearby settlements. Dunadry is one of these key settlements nearby that can accommodate new incoming BIA and Nutts Corner executives and employees. In this context, the reduction in the housing growth allocation for Dunadry of 83 per cent between the POP and the dPS raises significant issues in whether this is a coherent and logical strategy.
- 1.24 The Spatial Growth Strategy at Policy SP 4.3 is therefore unsound. The reduction in the housing growth allocation for Dunadry is unsound and contrary to Tests - CE1, CE2 and CE 4.

- 1.25 Policy SP 4.3 fails the Test CE1 Coherence and Effectiveness as the dPS cannot be considered to be a coherent strategy, as it is significantly different from the housing allocation set out in the POP and its policies and allocations do not logically flow from this Strategy. Policy SP 4.3 also fails Test CE2 as the strategy, policies and allocations are unrealistic and inappropriate, have not considered all the relevant alternatives and are not founded on a robust evidence basis for Dunadry.
- 1.26 Policy SP 4.3 fails Test -CE4. The SGS allocation to Dunadry does not provide reasonable flexibility to enable it to deal with changing circumstances. Policy SP 4.1 speaks of providing a choice of housing for people. However, this growth allocation for Dunadry will provide little choice of housing for existing or future Dunadry residents.
- 1.27 Policy SP4.3 also fails Consistency Tests Test -C1 and Test C3. The dPS does not take into account the Regional Development Strategy (RDS) and its long term policy direction. RDS and PPS policies in support of the provision of new housing at settlements along or near key transport routes and close to SEL's have not been taken in account in the SGS allocation of housing to Dunadry.

Demography

- 1.28 We attach the NISRA statistics for Templepatrick Ward at Appendix MKA 2 which incorporates Dunadry Village.
- 1.29 These statistics indicate that the population of Dunadry has grown from 237 people in 2001 to 430 people in 2011, a population growth of around 193 people over ten years. This equates to an increase in the village population of 81.4 per cent over a ten year period. We are unaware of any complaints from local residents over the growth of the village over this period.
- 1.30 The NISRA figures also indicate that there has been significant changes in demography within the village and ward, namely:
 - The number of people over 65 years of age has increased;
 - The number of one person households has increased;
 - The average household size has reduced.
 - The number of people under 16 years of age has reduced.

- 1.31 Ten houses over a 15 year Plan Period is less than one house per year within the village. This level of allocation will ensure that the village population will struggle to sustain itself. Based on the current housing allocation, the future growth of the village on the SGS housing allocation is likely to be around seven times lower than the growth between 2001 and 2011.
- 1.32 The changing demography of the village suggests the need for more, smaller houses in the settlement to meet the evolving future needs of the population. The dPS does not provide sufficient flexibility to address the changing demographics of the village or meet the future needs of the village.
- 1.33 In terms of demography the dPS SGS housing allocation of only ten dwelling units is unsound and fails soundness Test CE 4 as it is not reasonably flexible to enable it to deal with changing circumstances. There could be any number of potential changing circumstances. However, we believe two potential scenarios are reasonable.
 - Declining household size, increased single person households, increased elderly and declining under 16's clearly shows a changing demography within the village that requires more, smaller houses in the future.
 - Any economic upturn in NI, and in particular, if the two SEL's at BIA and at Nutt's Corner, close to Dunadry, see significant investment and employment increases over the Plan Period the village housing allocation does not provide any flexibility to enable it to accommodate these new workers.
- 1.34 The failure of the dPS to consider changing demography and how it may impact on Dunadry also means that the dPS is unsound and fails Test - CE2 as the strategy, policies and allocations are not realistic, appropriate, have considered the relevant alternatives and is not founded on a robust evidence basis.
- 1.35 Clarification is sought as to why the Council consider that there is limited scope for Dunadry to contribute towards the Council's target for new homes and why the Council considers that a growth allocation of ten dwellings over a 15 year Plan Period is considered appropriate to meet the needs of the village settlement.

1.36 There is no evidence within the published evidence base that a significant assessment of the capacity of Dunadry to grow has been carried out to inform the dPS. Applying this growth allocation figure for Dunadry is premature and should not be applied without a full and proper assessment of the housing growth allocation of Dunadry being undertaken.

Evidence Paper 2: Settlement Evaluation - Dunadry.

- 1.37 We have considered Evidence Paper 2: Settlement Evaluation and its strategic settlement analysis for Dunadry as set out at Pages 84 to 87 of this paper. In terms of the northern node of Dunadry settlement seven green arrows indicating No Obvious Development Constraint are indicated on the Settlement Map. There is one red arrow indicating a Potential Development Constraint on lands to the north of the A6 Belfast Road. We have assumed that the potential development constraint indicated is the surface flooding indicating north of the A6. However, four of the green arrows are also affected by potential surface flooding. We request clarification on the potential development constraints indicated on the Map. The landowner of the lands to the north of the A6 has already carried out drainage works on this land and any surface flooding issue has already been resolved. Surface flooding, outside of floodplains, can be resolved in the context of a drainage assessment. It is minor development constraint that can be readily overcome.
- 1.38 We believe that the settlement evaluation of Dunadry and in particular the assessment of obvious development constraints is unsound, is not founded on a robust evidence basis, it is contrary to Test CE2 Coherence and Effectiveness. It is also unsound as it is not reasonably flexible to enable it to deal with changing circumstances and it is contrary to Test CE4.

Revisions to the dPS.

- 1.39 We request that the dPS SGS be amended, on the basis of the evidence set out above, to increase the growth allocation for Dunadry from 10 housing units to the original 60 housing units as proposed in the POP.
- 1.40 We also request that consideration be given to designating a village local centre for Dunadry Village within the Strategy for various commercial, community, recreational and retail uses to provide necessary amenities within the village.

Appendix MKA 1	
8	

MKA PLANNING LTD Chartered Town Planners

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Town and Country

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W: www.mkaplanning.co.uk

28th August 2018

Ms Sharon Mossman Principal Planning Officer Antrim and Newtownabbey District Council Mossley Mill Carmoney Road North Newtownabbey **BT36 5QA**

Dear Sharon.

RE: ANTRIM & NEWTOWNABBEY LOCAL DEVELOPMENT PLAN 2030 - PREFERRED OPTIONS PAPER - (POP).

- 1. PROPOSED DESIGNATION OF DUNADRY AS A VILLAGE WITHIN THE SETTLEMENT HIERARCHY IN THE PROPOSED LOCAL DEVELOPMENT PLAN (LDP).
- 2. ALLOCATION OF SUFFICIENT LAND WITHIN THE LDP TO ALLOW SUSTAINABLE GROWTH OF THE PROPOSED VILLAGE AND INCLUSION OF LANDS BETWEEN NO.240 BELFAST ROAD, DUNADRY AND NO. 2 RATHMORE ROAD WITHIN THE NEW SETTLEMENT LIMITS OF DUNADRY.

I refer to the above new local development plan for Antrim and Newtownabbey District Council and specifically the provisions set out in the POP for Dunadry.

I am aware of other representations made by others relation in Dunadry to the POP.

I have been instructed to write to you on behalf of my Clients Mc Henry Brothers (Ireland) Ltd. prior to the publication of the Draft LDP on two points. Firstly, to express our support for the POP's:-

1. PROPOSED DESIGNATION OF DUNADRY AS A VILLAGE WITHIN THE SETTLEMENT HIERARCHY IN THE PROPOSED LOCAL DEVELOPMENT PLAN (LDP).

Secondly, that the subject site identified should be incorporated within the new settlement limits of Dunadry.

2. ALLOCATION OF SUFFICIENT LAND WITHIN THE LDP TO ALLOW SUSTAINABLE GROWTH OF THE PROPOSED VILLAGE AND INCLUSION OF LANDS BETWEEN NO.240 BELFAST ROAD, DUNADRY AND NO. 2 RATHMORE ROAD WITHIN THE NEW SETTLEMENT LIMITS OF DUNADRY.

I set out below our support and justification for the POP proposal that Dunadry be designated as a village, that sufficient land is allocated within the LDP to Dunadry and that the proposed subject lands, as set out in red on Plans MKA1 and Plan MKA2, in Appendix MKA1 are included within the new settlement limits of Dunadry.

Mary Kennedy - mary@mkaplanning.co.uk

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- 1. PROPOSED DESIGNATION OF DUNADRY AS A VILLAGE WITHIN THE SETTLEMENT HIERARCHY IN THE PROPOSED LOCAL DEVELOPMENT PLAN (LDP).
 - a. In the <u>Antrim Area Plan</u> (AAP) 1984-2001 only three hamlets were identified in the green belt - Groggan, Milltown and Dunadry. Development limits were not identified for hamlets. Hamlets provided locations where limited numbers of dwellings could be approved subject to development being compatible with the size, form and character of the particular hamlet and the facilities it possessed, (Para. 24.2 and 24.3). As one of only three hamlets identified in the AAP the importance of Dunadry cannot be understated.
 - b. The <u>Antrim Area Plan</u> 1984-2001 Alteration No. 1 1991 Limits of Development for Hamlets provided a development limit for Dunadry hamlet. I attach a copy of this settlement map at **Appendix MKA2**. Interestingly, at Paragraph 3.6 the Alteration states that land at the Dunadry Inn is included inside the development limit for hotel use only.
 - c. The Council's Evidence Paper in 2017 indicates that there are 190 households in Dunadry providing a population of 430 residents. I believe this population figure is based on the 2011 NI Census. As we are now in 2018 I believe reliance on the 2011 NI Census figure is misplaced and underestimates the settlement population. If one uses the present average household size of 2.63 of the Templepatrick Electoral Ward in which Dunadry resides this would give a resident population of 448 residents. I believe that the resident population and number of households within Dunadry has increased from the 2011 figure and is now at least 448 residents in 2018.
- d. In assessing whether Dunadry should be designated as a village I believe Council must also take into account the significant transient residential population that also resides in the settlement in guest and hotel accommodation. The Dunadry Inn provides eighty double bedrooms and therefore at peak occupancy at certain times of the year provides up to another 160 transient residents within the settlement. On occasion this will also increase the total resident and transient population of Dunadry up to 608 persons. I also believe that there is a working population of over one hundred employees within Dunadry within existing service provision. This "working" population further swells the resorting population within the settlement and further supports its designation as a village.
- e. I believe that the POP is correct in using population figures and the threshold of 250 residents to now define Dunadry as a village. Dunadry is now well over the threshold for a hamlet. With a permanent residential population around 448(179%) persons, a transient population of up to 160 people, a total population of up to 608 (242%) residents greater than the threshold of 250 people and an even greater resorting population I believe that Dunadry clearly now qualifies as a village using the definition set out in the POP. It is no longer a hamlet.
- f. In terms of service provision and significant employment provision within Dunadry I would point out the following facilities, are all available to the public within the settlement, which further support's Dunadry's designation as a village namely:
 - Hotel providing 80 double bedrooms.
 - Leisure and fitness club open to the public including fully equipped gym.
 - 12.5m heated indoor swimming pool, spa pool and steam room.
 - Existing and proposed bar, restaurant and grill bar and two conference rooms within hotel open the public.
 - Beauty salon/Spa,
 - Ellie May's bar/restaurant.

- · Church and church hall
- The Dunadry hotel provides free venue hire and hospitality to several charitable organisations and DCA meetings throughout the year.
- The church hall is regularly used for youth club, Boy's Brigade and senior citizens activities
- g. Therefore, in terms of the POP's settlement hierarchy I support the POP Option 3 designating Dunadry as a village as the preferred option as it is clearly a local service centre providing significant local opportunities for housing, hospitality, leisure and employment.
- 2. ALLOCATION OF SUFFICIENT LAND WITHIN THE LDP TO ALLOW SUSTAINABLE GROWTH OF THE PROPOSED VILLAGE AND INCLUSION OF LANDS BETWEEN NO.240 BELFAST ROAD, DUNADRY AND NO. 2 RATHMORE ROAD WITHIN THE NEW SETTLEMENT LIMITS OF DUNADRY.

There are a number of material planning considerations that supports the allocation of sufficient land within the LDP to Dunadry to allow the sustainable growth of the proposed village, namely:-

- 1. The Council's preferred option Option 4 as set out in the POP for a Strategic Employment Location (SEL) to be located at Belfast International Airport creates a site specific need for additional land at Dunadry for new housing opportunities for new workers attracted to the new SEL. Dunadry, strategically located close to the International Airport, within 3.5km from the M2 motorway (NW Key Transport Corridor) and 5km from the Ballymartin Park and Ride site is ideally located to provide future residents with a high quality of life and an attractive residential environment in close proximity to the Airport and located within easy travelling distance to the Belfast region.
- 2. The Council's Spatial Growth Strategy set out in the POP supports the provision of additional housing land to Dunadry. Dunadry is a local service centre providing opportunities for housing, leisure, hospitality and jobs and is highly accessible. Therefore, I believe this proposal is fully in accordance with a key objective of the Strategy which is to:
 - Sustain and maintain the roles of our villages as local service centres providing opportunities for housing and employment taking account of the benefits of accessibility to our key transport routes.
- 3. The POP Paper also states at Paragraph 3.8 that
 - The Plan will also seek to encourage the delivery of affordable housing opportunities to help meet local need and ensure a diverse choice of housing for an aging and changing population.
- 4. Another key objective of the POP Paper is:
 - To provide a sufficient supply of land for mainstream and affordable housing and ensure a diverse choice of housing.
- 5. I believe that this proposal to designate Dunadry as a village is also in line with the strategic planning policies of the Regional Development Strategy and in particular:
 - SPG 13 sustain rural communities living in smaller settlements and the open countryside.
 - SPG 14 improve accessibility for rural communities.

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- Revitalising small towns and villages.
- 6. I attach at Appendix MKA 3 the latest housing monitor carried out by Antrim and Newtownabbey Council for Dunadry for 2018. The Council's monitor indicates that there are 5.6 hectares of land with a potential for 80 housing units within the existing settlement limits of Dunadry. I attach Table MKA1 below with various comments on the housing monitor sites.

Table MKA1 - Housing Monitor sites within Dunadry in 2018.

Ref No.	Potential Yield	Comments		
113804	17	There is no start on this site. There is a fence around the site. A planning application for housing on this land for 13 dwellings remains undetermined. The previous permission for 17 dwellings has expired.		
114414	1	Vacant site.		
114483	1	There is a house built on site.		
114883	45	The hotel use remains in operation.		
114837	5	Brownfield site.		
114838	1	1 house built on site, potential for 1 more dwelling.		
114919	2	1 house has been built on site, potential for 1 more dwelling.		
114952	4	3 - 4 houses under construction.		
115075	4	1 House has been built on site.		

Source: Housing Monitor Information.

The key housing monitor site in Dunadry is **Site 114883** - **Dunadry Inn** which provides more than half of the proposed housing units and land within the settlement. The planning permission for housing on part of the Dunadry Inn granted in 2009, expired in 2014, (DOE Ref. No. T/2004/1305/O). Subsequently planning permission has been granted for extension of the existing hotel leisure/fitness centre (T/2014/0046/F) and for extension to hotel to provide grill bar, lounge bar and toilets and two additional conference rooms (LA03/2018/0423/F). I attach copies of these permissions in **Appendix MKA4**.

Newspaper articles indicate that the Dunadry Inn Hotel is now under new management by the Mc Keever Group and over £1m has been spent on their refurbishment of the hotel building. Permission has recently been granted for further significant expansion of the hotel's facilities.

Considering the significant existing and proposed financial investments in the enhancement of the hotel use I do not believe that it is realistic or reasonable within the POP to assume that this site comprising 3.6 hectares and potentially 45 housing units which provides more than half of the proposed housing land within Dunadry is likely to become available for housing use within the duration of the LDP. I also believe that it is appropriate to point out that approximately forty per cent of this housing monitor site 114883 is situated within the floodplain and would not be appropriate for housing development. I attach a Rivers Agency up to date Dunadry Floodplain illustrating this point at Appendix MKA5.

The majority of the proposed housing yield in Dunadry is either a thriving hotel or the existing curtilage of existing dwellings which may not be available for development in the Plan period. For these reasons I do not believe that the figures set out in *Figure 15 – Distribution of Housing Land Supply at 1 April 2015* and *Table 5: Existing Houses and Housing Land Supply* with Resultant growth rate indicating 82 potential housing units and growth rate of 43 per cent for Dunadry within the POP are achievable, realistic or reasonable.

The Council, to provide sufficient land within Dunadry to ensure sustainable growth of the village, requires at least three hectares of new land to be incorporated within the new development limits of the proposed village to meet the predicated shortfall of housing land

supply, meet local housing need and the need for housing from the SEL and provide a diverse choice of housing for an ageing and changing population as set out in the POP.

Considering the infrastructural and environmental constraints on the settlement I believe that the most appropriate expansion of Dunadry is in a westerly direction, along the Belfast Road from the northern node of development, as identified on **Plans MK1** and **Plan MKA2** for the following reasons set out below:-

- 1. The subject site, measuring 3.17 hectares, is a natural, logical expansion of the northern node of Dunadry settlement, situated adjacent the existing settlement limit to the east and to the south.
- 2. The subject site is located along a major traffic route, bus route and with bus stops along the site frontage making this a highly accessible and sustainable location and helps provide a central focus for the settlement. It is also located close to the hotel and the bar/restaurant. The subject site's frontage could be developed for commercial and/or community uses.
- 3. The subject site almost exactly meets the identified shortfall in housing land supply set out earlier in this letter within the existing settlement limits. A small elevated part of the subject site is not considered suitable for development.
- 4. The subject site is physically and visually well defined and integrated into the Dunadry settlement. Existing development, a watercourse and mature vegetation provides strong physical and visual boundaries to the proposed settlement limit to the north and west. The Belfast Road provides a strong boundary along the southern boundary. The subject site provides well defendable development limits to the settlement.
- 5. The subject site "rounds off" the existing northern node of development, helps integrate existing development along Rathmore Road and it is an natural infilling of the gap within existing development between Belfast Road and Rathmore Road.
- 6. The subject site helps maximise existing public infrastructure investment in existing public roads, drainage, footpaths and street lighting.
- 7. Other potential lands adjacent the settlement limit of Dunadry are potentially affected by infrastructural, landscape and environmental constraints.

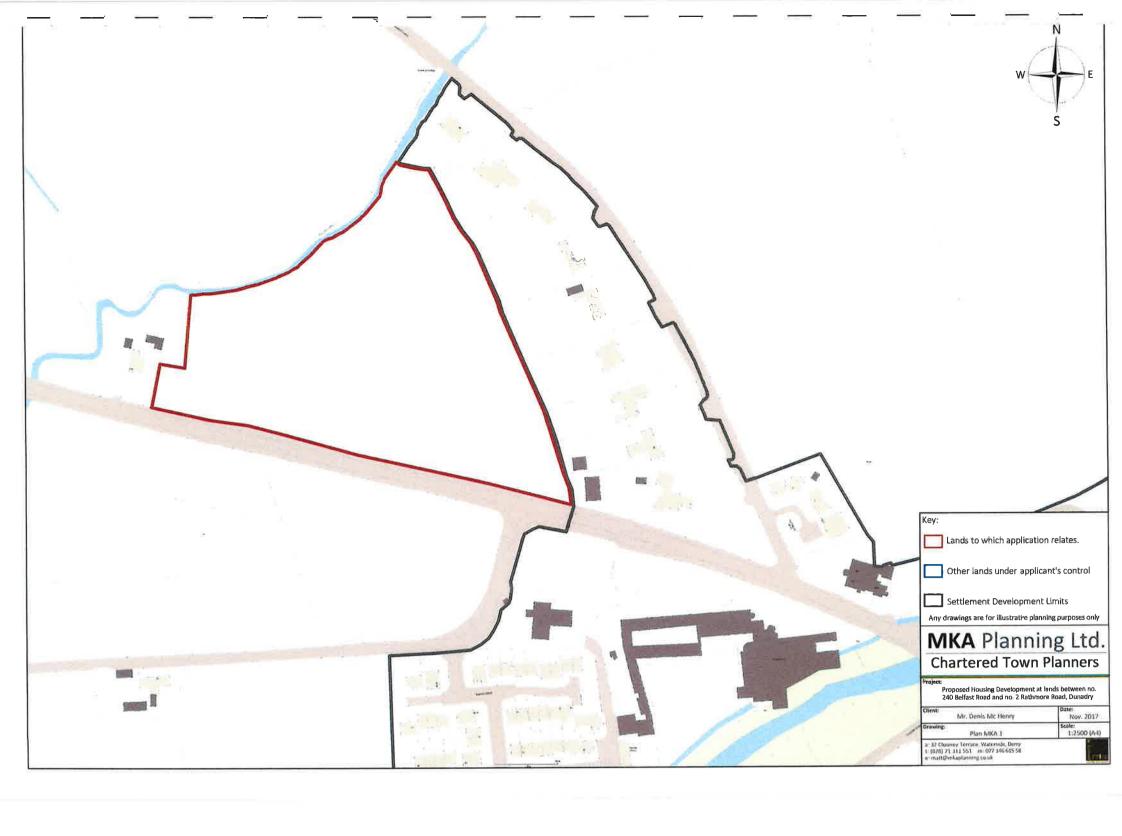
Therefore, on behalf of my Clients, I support the Council's designation of Dunadry as a village and for the reasons set out above, request that the Council expand the existing settlement development limits to incorporate the subject site within the new settlement settlement of Dunadry in the new Antrim and Newtownabbey Local Development Plan 2030.

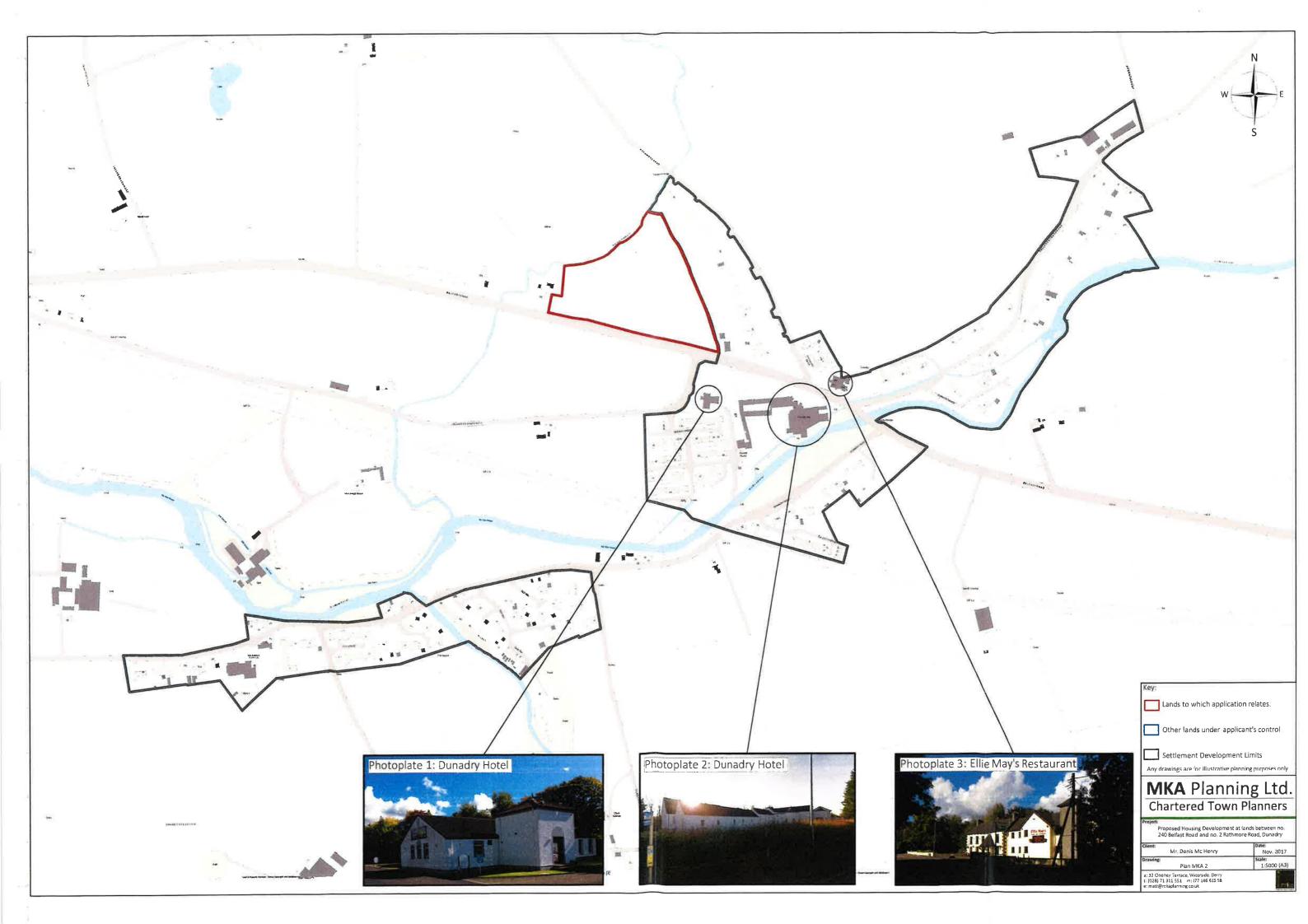
Yours faithfully,

Matt Kennedy (MRTPI)
Principal Planning Manager
MKA Planning Ltd.

c.c Clients – Mc Henry Brothers (Ireland) Ltd.Mr Brendan Carey – Carey Consulting Ltd.

Appendix MKA	
	MKA DI ANNING LTO
	MKA PLANNING LTD Chartered Town Planners 32 Clooney Terrace, Waterside, Derry, BT47 6AR, Tel: (028) 71 311551 Fax: (028) 71 313404

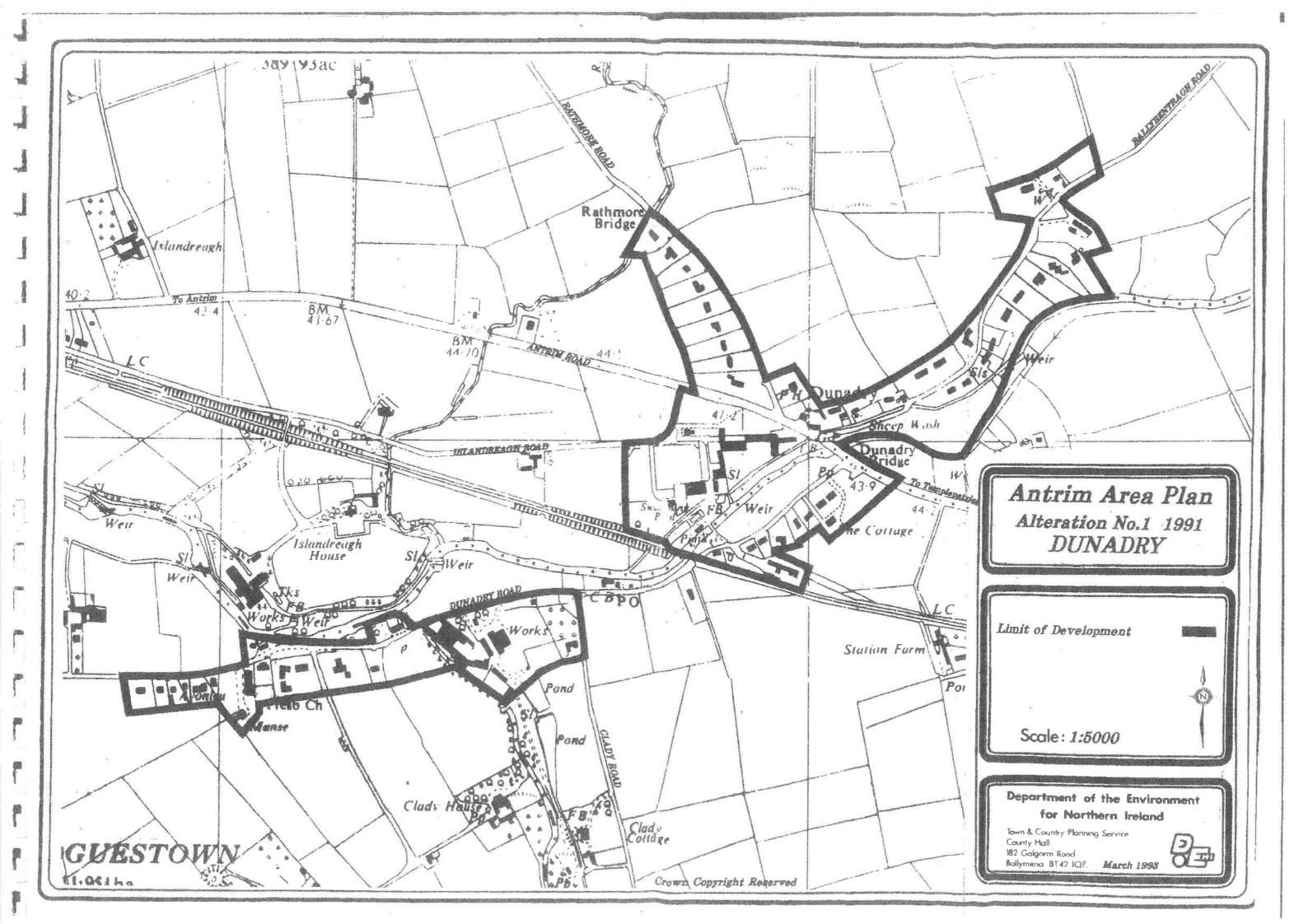




Appendix MKA 2

MKA PLANNING LTD Chartered Town Planners

32 Clooney Terrace, Waterside, Derry, BT47 6AR, Tel: (028) 71 311551 Fax: (028) 71 313404

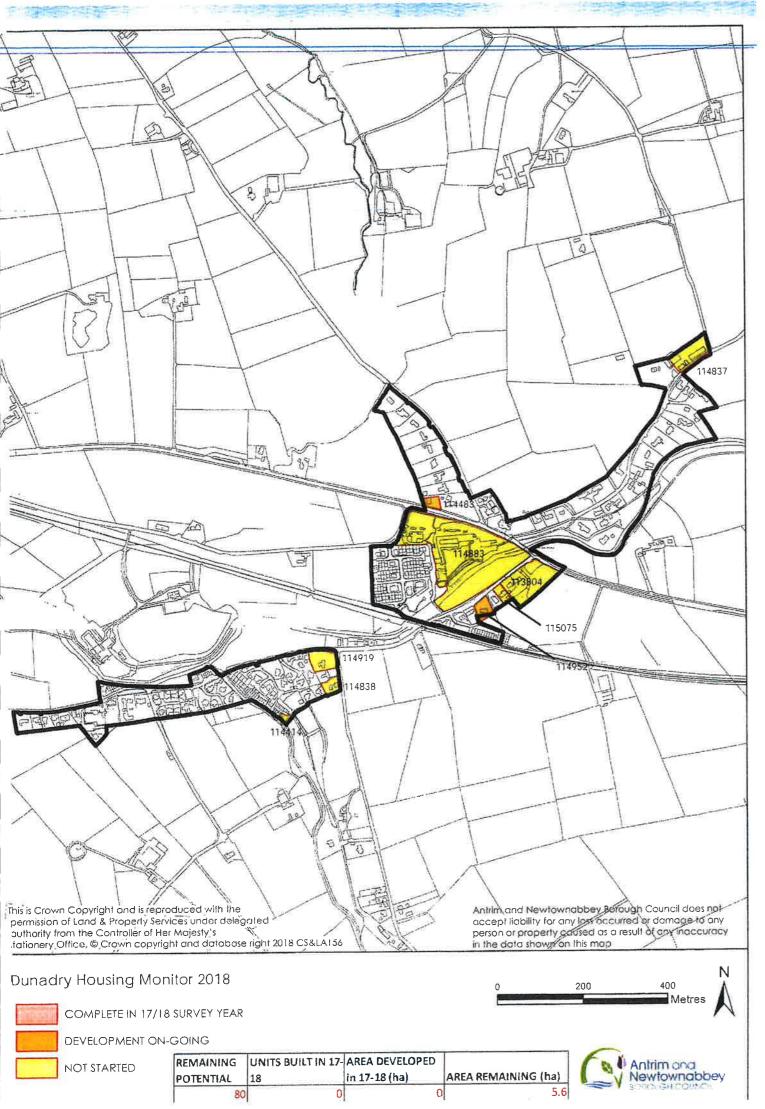


Appendix MKA 3

MKA PLANNING LTD Chartered Town Planners

32 Clooney Terrace, Waterside, Derry, BT47 6AR, Tel: (O28) 71 311551 Fax: (O28) 71 313404

UNADRY	HOUSING MONITOR	2018					T			
	POTENTIAL UNITS	UNITS COMPLETE	REMAINING POTENTIAL	BUILT IN 17/18	SITE AREA	AREA DEVELOPED	AREA DEVELOPED 17/18	AREA REMAINING	STATUS	COMMISSION
114483	1	0	1	0	0.1	0	7			COMPLETION DATE
114952	4	0	-			- 0	C C	0.1	DEVELOPMENT ON-GDING	
113804			4	0	0.17	0	0	0.17	DEVELOPMENT ON-GOING	
	1.7	0	17	0	0.8	0	0		NOT STARTED	
114414	1	0	1	0	0.05	0				
114837	5	0					0	0.05	NOT STARTED	
114838	1		3	L L	0.38	0	0	0.38	NOT STARTED	
***************************************		0	1	0	0.14	0	0		NOT STARTED	
114883	45	0	45	0	3.6	0				
114919	2	0	2	0	0.26		0	170.00	NOT STARTED	
115075	A					0	0	0.26	NOT STARTED	
113073		V	4	0	0.1	0	0	0.1	NOT STARTED	
			80	0			0	5.6		





Appendix MKA 4

MKA PLANNING LTD Chartered Town Planners

32 Clooney Terrace, Waterside, Derry, BT47 6AR, Tel: (028) 71 311551 Fax: (028) 71 313404



Outline

Approva!



Area:







Application No: Application Type:

Decision:

T/2004/1305/O

Date of Application:

Nov 4, 2004

Date of Decision:

Antrim Jan 15, 2009



Site for Proposed Development:

Land Adjacent to Dunadry Hotel, Dunadry.

Site of mixed use development to include residential use, leisure suite, alterations to existing hotel premises to include new craft shop, new dedicated access for hotel with

associated reconfiguration of car park. (Amended concept parking and access deta

Applicant: Mr F Mooney

Description of Proposal:

Agent: GM Design Associates Ltd

Address: C/O GM Design Associates Ltd

Address: 22 Lodge Road

Coleraine

BT52 1NB

Developer Type:

Development Type: PR

Proposed Land Use: Housing, Residential Use

Date of Council meeting:

Oct 23. 2008

Recommendation to Council: Authority

View of Council: Agree

Local

Date First Advertised:

Nov 24, 2004

Date of Issue: Jan 15, 2009

Article 31:

Check Planning Portal Documents (Decisions)



Check Planning Portal Documents (Applications)



Conditions:

- 1 As required by Article 35 of the Planning (Northern Ireland) Order 1991, application for approval of the reserved matters shall be made to the Department within 3 years of the date on which this permission is granted and the development, hereby permitted, shall be begun by whichever is the later of the following dates:- i. the expiration of 5 years from the date of this permission; or ii. the expiration of 2 years from the date of approval of the last of the reserved matters to be approved. Reason: Time limit.
- 2 Approval of the details of the siting, design and external appearance of the buildings, the means of access thereto and the landscaping of the site (hereinafter called 'the reserved matters'), shall be obtained from the Department, in writing, before any development is commenced. Reason: To enable the Department to consider in detail the proposed development of the site.
- 3 Full particulars, detailed plans and sections of the reserved matters required in Conditions 1 and 2 shall be submitted in writing to the Department and shall be carried out as approved. Reason: To enable the Department to consider in detail the proposed development of the site.
- 4 The development hereby approved shall be designed in accordance with the provisions of PPS7 Quality Residential Environments and 'Creating Places' and shall generally accord with the provisions of the Design Concept drawing, No 10/3 which was received on the 19th June 2008. Reason: To ensure a quality residential development.
- The dwellings noted as 'Block A' on approved drawing 10/3, date stamped the 19th June 2008, shall have a ridge height of less than 8 metres above existing ground level. Reason: To ensure that the development respects the character of the surrounding
- 6 The dwellings noted as 'Block B' on approved drawing 10/3, date stamped the 19th June 2008, shall have a ridge height no higher than that of the adjacent hotel buildings. Reason: To ensure that the development respects the character of the surrounding
- The dwellings noted as 'Block C' on approved drawing 10/3, date stamped the 19th June 2008, shall be no higher than 3 storeys, subject to approval by the Department at Reserved Matters stage. Reason: To ensure that the development respects the character of the surrounding area.
- The plans and particulars submitted in accordance with Condition No. 2 above shall include: -a. a plan showing the location of, and allocating a reference number to, each existing tree on the site which has a stem with a diameter, measured over the bark at a point 1.5 metres above ground level, exceeding 75 mm, showing which trees are to be retained and the accurate crown spread of each retained tree; b. details of the species, diameter (measured as in paragraph (a)), and the height, and an assessment of the general state of health and condition of each retained tree and of each tree adjoining the site boundary and to which

paragraphs and (d) apply; c. details of any trees to be removed on the site or on land adjoining the site boundary; d. details of any proposed arboricultural work or tree surgery of any retained tree, or of any tree on land adjacent to the site; e. details of any proposed alterations in existing ground levels, and of the position of any proposed excavation, including service lines; [within the crown spread of any retained tree and / or of any tree adjoining the site boundary] or [within a distance from any retained tree or any tree on and adjoining the site boundary, equivalent to half the height of that tree]; f. details of the specification and position of fencing (and any other measure to be taken) for the protection of any retained tree from damage before or during the course of development.Reason: To ensure the continuity of amenity afforded by existing trees.

- The proposed craft shop shall be used only for the retail sale of craft goods only and for no other purpose in Part A, Use Class A1 of the Schedule to the Planning (Use Classes) Order (NI) 2004. Reason: To prohibit a change to an unacceptable use within this Use Class.
- 10 The erection of fencing for the protection of any retained tree shall be undertaken in accordance with the approved plans and particulars before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made or any other works carried out, or fires lit without the written consent of the Department.Reason: To ensure the continuity of amenity afforded by existing trees.
- 11 A landscape management plan, including long term design objectives, performance indicators, management responsibilities and maintenance schedules for all landscaped areas, other than small, privately owned domestic gardens, (except for trees or other vegetation retained in the public interest) shall be submitted to and approved by the Department prior to the occupation of the development or any phase of the development, whichever is the sooner. The landscape management plan shall be carried out as approved.Reason: To ensure the sustainability of the approved landscape design through its successful establishment and long term maintenance.
- 12 No development shall take place until close-contouring drawings indicating existing and proposed ground levels in relation to the 100 year flood level over this part of the Six Mile Water (measured to Ordnance Datum Belfast) have been submitted with the Reserved Matters application and approved by the Department Reason: To ensure development is restricted to that part of the site which lies above the highest recorded flood level and to prevent future flooding of dwellings hereby approved.
- 13 The proposed housing adjacent to the Six Mile Water must not encroach upon the bank retaining wall. Reason: To protect the nature conservation interest of the site.
- 14 No development should encroach within 5 metres of the riverbank. Reason: To protect the nature conservation interest of the river corridor.
- 15 The existing trees along the south east boundary of the site, adjacent to Dunadry Road as indicated on the approved plan 10/3 date stamped 19th June 2008, shall be retained at a minimum height of 15 metres. Reason: To ensure the maintenance of screening to the site.
- 16 No site works of any nature or development shall take place until a programme of archaeological work has been implemented, in accordance with a written scheme and programme prepared by a qualified archaeologist, submitted by the applicant and approved by the Department. The programme should provide for the identification and evaluation of the archaeological remains within the site, for mitigation of the impacts of the development through excavation recording or by preservation of remains and for the preparation of an archaeological report. Reason: To ensure that archaeological remains within the application site are properly identified and protected or appropriately recorded.
- 17 Access shall be afforded to the site at all reasonable times to any archaeologist nominated by the Department to observe the operations and to monitor the implementation of archaeological requirements. Reason:To monitor programmed works in order to ensure that identification, evaluation and appropriate recording of any archaeological remains, or any other specific work required by condition or agreement, is completed.
- 18 A scale plan at 1:500 shall be submitted as part of the reserved matters application showing the access to be constructed in accordance with the attached form RS1.Reason: To ensure there is a satisfactory means of access in the interests of road safety and the convenience of road users.

- Developers should acquaint themselves of their statutory obligations in respect of watercourses as prescribed in the Drainage (Northern Ireland) Order 1973, and consult the Rivers Agency of the Department of Agriculture accordingly on any related matters.
- 2 Any proposals in connection with the development, either temporary or permanent which involve interference with any watercourse at the site:- such as diversion, culverting, bridging; or placing any form of structure in any watercourse, require the written consent of the Rivers Agency. Failure to obtain such consent prior to carrying out such proposals is an offence under the Drainage Order which may lead to prosecution or statutory action as provided for.
- 3 Any proposals in connection with the development, either temporary or permanent which involve additional discharge of storm water to any watercourse require the written consent of the Rivers Agency. Failure to obtain such consent prior to permitting such

- discharge is an offence under the Drainage Order which may lead to prosecution or statutory action as provided for.
- 4 If, during the course of developing the site, the developer uncovers a watercourse not previously evident, he should advise the local Rivers Agency office immediately in order that arrangements may be made for investigation and direction in respect of any necessary measures required to deal with the watercourse.
- Where an undesignated watercourse flows through or adjacent to a development site, it is strongly advised that a working strip of appropriate width is retained to, in future, enable riparian landowners to fulfil their statutory obligations/responsibilities.
- 6 There will be a general presumption against the erection of buildings or other structures over the line of culverted watercourses. Any proposal for such requires the written consent/approval of the Rivers Agency. Failure to obtain such approval is an offence under the Drainage Order which may lead to prosecution or other statutory action as provided for.
- In order to decrease the risk of the incorrect diversion of 'foul' sewage to drains carrying rain/ surface water each building shall be provided with such sanitary pipework, foul drainage and rain-water drainage as may be necessary for the hygienic and adequate disposal of foul water and rain-water separately from that building. The drainage system should also be designed to minimise the risk of wrongly connecting the 'foul' sewage system to the rain-water drainage system, once the buildings are occupied.
- The buildings associated with this planning application should not be occupied unless the necessary sewerage infrastructure is in place to transfer foul sewage to a DRD Water Service sewer or a wastewater treatment facility consented by EHS. It should be noted that EHS does not favour existing sewerage infrastructure being utilised in such a way as to act as a temporary 'cesspit'. Where a temporary 'cesspit' is to be utilised, it should be designed in accordance with current 'best practice' and any transfer or movement of sewage, by tanker or other means, shall be carried out in accordance with The Controlled Waste (Duty of Care) Regulations (Northern Ireland) Regulations (Northern Ireland) 2002.
- The storm drainage of the site should be designed to the principles of Sustainable Drainage Systems (SuDs) in order to minimise the polluting affects of stormwater on waterways.
- 10 Construction of SuDs should comply with the standards in the design manual for Scotland and Northern Ireland (CIRIA C521).
- 11 Any oil tanks serving the apartments should be bunded. Pollution Prevention Guideline (PPG2).
- 12 The applicant should comply with the Pollution Prevention Guidelines (PPG5 and 6) in order to minimise the impact of the construction phase of the project on the environment it should be noted that several SuDs features may be useful pollution prevention measures during the construction phase.
- 13 The applicant's attention is drawn to the Wildlife (Northern Ireland) Order 1985 which states that it is an offence to intentionally kill, injure or take any wild bird. It is also an offence to take, damage or destroy the nest or egg(s) of these birds or to disturb bird(s) while they are building, in or at a nest, or whilst they have dependent young. Where the bird is included in Schedule 1 of the Order any offence is liable to a special penalty.
- 14 For guidance on the preparation of the Written Scheme and Programme of Archaeological Work, which should be submitted for approval at least 4 weeks before work is due to begin, contact:- Environment and Heritage Service, Protecting Historic Monuments, 5-33 Hill Street, BELFASTBT1 2LATel: 028 90543044Quote Ref: SM11/1/Ant 050:118 & IHR 7180.
- Application for the excavation licence, required under the Historic Monuments and Archaeological Objects (NI) Order 1995 should be submitted at least 3 weeks before work is due to begin, by a qualified archaeologist responsible for the project to:

 Environment and Heritage Service, Recording Built Heritage, 5-33 Hill Street, BELFASTBT1 2LATel: 028 9023 5000 Ext 43009 or 43045
- 16 The developer's attention is drawn to the necessity of providing adequate sound insulation in walls and/or floors which separate one dwelling unit from another and from any possible noise impacts of the adjacent hotel operation. Advice on the required standards can be obtained from the Environmental Health Department of Antrim Borough Council.
- 17 Public water supply available, subject to Northern Ireland Water approval to connect. If required a connection will be granted on approval of a completed Northern Ireland Water Application Form and payment of the Department's standard charge. Contact Northern Ireland Water's Customer Services Unit to obtain an application form, or telephone Waterline on 0845 7440088.
- Foul water sewer available, subject to Northern Ireland Water approval to connect. If required a connection will be granted on approval of a completed Northern Ireland Water Application Form and payment of the DRD's standard charge. Contact Northern Ireland Water's Customer Services Unit to obtain an application form, or telephone Waterline on 0845 7440088.
- Surface water sewer not available. Surface water must not be taken to the foul sewer. Where it is proposed to discharge surface water to a river, stream or watercourse prior written consent for such discharge must be obtained from the Department of Agriculture's River Agency.
- 20 To ensure compliance with the Water and Sewerage Services (Northern Ireland) Order 1973, as amended 1993, consultation with Northern Ireland Water is essential at design stage with regard to the following matters: foul water and surface water sewerage (Article 17 agreement) requirements; existing sewer crossing the site. Contact Northern Ireland Water's Customer Services Unit or telephone Waterline on 0845 7440088.

- 21 The applicant is advised to contact Northern Ireland Water through its Customer Service's Unit or Waterline on 0845 7440088 upon receipt of this decision to discuss any issues of concern.
- 22 If during the course of developing the site the developer uncovers a pipe not previously evident the local Northern Ireland Water office should be notified immediately in order that arrangements may be made for investigation and direction in respect of any necessary measures required to deal with the pipe.
- 23 Water Service would make the following site specific comments; No structure to be erected within 6 metres either side of the actual routes of public sewers which traverse the proposed site.
- 24 This permission does not alter or extinguish or otherwise effect any existing or valid right of way crossing, impinging or otherwise pertaining to these lands.
- 25 This permission does not confer title. It is the responsibility of the developer to ensure that he controls all the lands necessary to carry out the proposed development.

DOEEPICD / 982793 / 14_GRANTED / J19899,84957 54.69837886366697, -6.141048775001785



Gongle

Map i Report a map error



APPROVAL OF PLANNING PERMISSION

Planning (Northern Ireland) Order 1991

Application No:

T/2014/0046/F

Date of Application: 10th February 2014

Site of Proposed Development:

Dunadry Hotel

2 Islandreagh Drive

Dunadry BT412HA.

Description of Proposal:

Extension of existing leisure/fitness centre to provide

dance/exercise space

Applicant: Mooney Hotel Group

Agent:

GM Design Associates Ltd

Address:

C/o Agent

Address:

22-24 Lodge Road

Coleraine BT921NB

Drawing Ref: 01, 02 & 03-2

The Department of the Environment in pursuance of its powers under the above-mentioned Order hereby

GRANTS PLANNING PERMISSION

for the above-mentioned development in accordance with your application subject to compliance with the following conditions which are imposed for the reasons stated:

As required by Article 34 of the Planning (Northern Ireland) Order 1991, the development hereby permitted shall be begun before the expiration of 5 years from the date of this permission.

Reason: Time Limit.

Application No T/2014/0046/F

ΒA





2. The extension hereby permitted shall be used only for purposes ancillary to the leisure and fitness centre.

Reason: To prohibit a change to an unacceptable use and to ensure the amenity of nearby residents is not adversely affected.

3. The extension hereby permitted and indicated on drawing number 03/2 date stamped 10th September 2014 shall be constructed of materials with, as a minimum, a Sound Reduction Index in dB Rw across the octave band frequencies as outlined in the table below:

	Oct	ave	Band	d Centre	Frequer	icy (H	Z)		
Structure	63		125	250	500	1000	200	4000	
Wall-cavity blockwork	41	2	44	42	47	55	65	65	
Roof-cladding with									
plasterboard lining and then									
acoustically absorbent lay-in									
grid ceiling tile with a void									
space of at least 200mm below	. 27		37	49	54	59		67	77
Windows with 10/200/6 glass	30		35	46	46	46		56	65

Reason: To protect the amenity of the surrounding area.

4. The extension hereby permitted as indicated on Drawing no. 03/2 date stamped 10th September 2014 shall be installed with acoustically silenced mechanical ventilation, exiting on the northern façade, providing a sound reduction index of 43dB Rw. The acoustically silenced mechanical ventilation shall provide sufficient ventilation to the development to ensure that windows to the development will not be open during its hours of operation.

Reason: To protect the amenity of the surrounding area.

 All amplified music and any PA system shall be played through an in-house amplification system and compression type noise limiter, which shall be set to and maintained at a noise level of no more than 85dB(A).

Reason: To protect the amenity of the surrounding area.

6. The development shall only operate between the hours of 07.00 to 23.00.

Reason: To protect the amenity of the surrounding area.

Application No. 7/2014/0046/F BA



DOE
Department of the Environment
www.doent.gavid.

Informatives

- This permission does not alter or extinguish or otherwise affect any existing or valid right of way crossing, impinging or otherwise pertaining to these lands.
- This permission does not confer title. It is the responsibility of the developer to ensure that he controls all the lands necessary to carry out the proposed development.

Dated: 15th September 2014

Authorised Officer

BA

Application No T/2014/0046/F

,23



APPROVAL OF PLANNING PERMISSION

Planning Act (Northern Ireland) 2011

Application No:

LA03/2018/0423/F

Date of Application: 30th April 2018

Site of Proposed Development:

Dunadry Hotel 2 Islandreagh Drive

Dunadry

Description of Proposal:

Construction of two storey entrance porch and stairwell incorporating a passenger lift. Two storey extension to front of building, northern elevation, to provide fire escape from first floor, on ground floor, a grill bar, lounge bar and toilets, at first floor, extension will provide two additional conference rooms

Applicant: McKeever Group Hotel

Address:

Corr's Corner Hotel

315 Ballyclare Road

Newtownabbey

BT36 4TN

Agent:

Quinn Design Associates

Address: 34 Merville Garden Village

Newtownabbey

BT27 9TF

Drawing Ref: 01, 02, 06, 07, 08

The Council in pursuance of its powers under the above-mentioned Act hereby

GRANTS PLANNING PERMISSION

for the above-mentioned development in accordance with your application subject to compliance with the following conditions which are imposed for the reasons stated:

Application No. LA03/2018/0423/F

Page 1 of 2



1. The development hereby permitted shall be begun before the expiration of 5 years from the date of this permission.

Reason: As required by Section 61 of the Planning Act (Northern Ireland) 2011.

Informatives

- This permission grants planning consent only and other statutory approvals may be required.
- This permission does not alter or extinguish or otherwise affect any existing or valid right of way crossing, impinging or otherwise pertaining to these lands.
- This permission does not confer title. It is the responsibility of the developer to ensure that he controls all the lands necessary to carry out the proposed development.

Dated: 6th August 2018

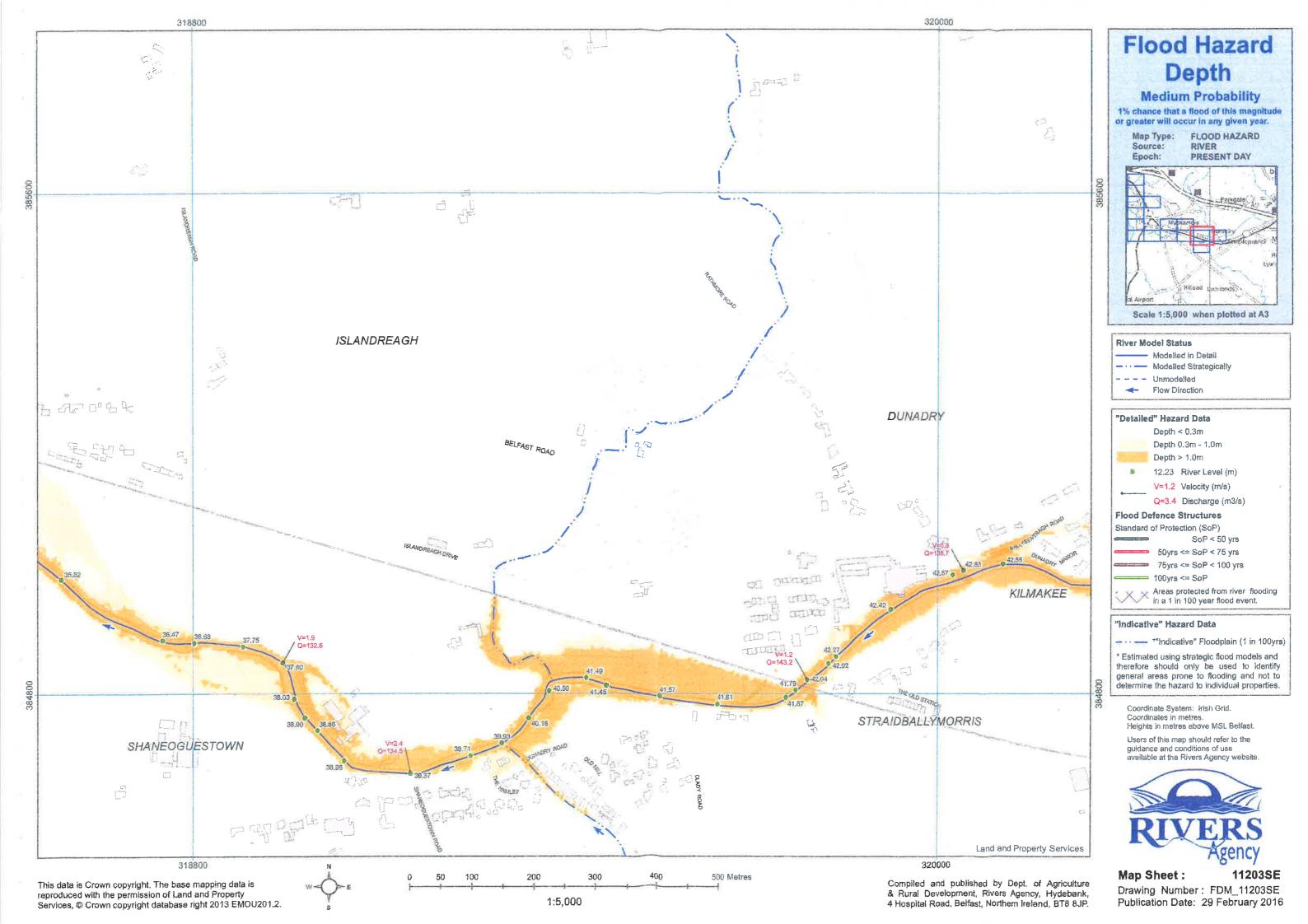
Authorised Officer

Application No. LA03/2018/0423/F

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Appendix MKA 5 MKA PLANNING LTD Chartered Town Planners

32 Clooney Terrace, Waterside, Derry, BT47 6AR, Tel: (028) 71 311551 Fax: (028) 71 313404



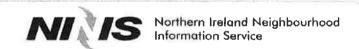
Appendix MKA 2

MKA PLANNING LTD Chartered Town Planners

32 Clooney Terrace, Waterside, Derry, BT47 6AR, Tel: (028) 71 311551 Fax: (028) 71 313404







Area Profile Report

Created Wednesday, August 21, 2019 4:02 PM

pulation Estimates for Templepatrick Ward

estimated population of **Templepatrick** Ward at 30 June 2017 was **2,466**, of which **1,196 (48.5%)** e male and **1,270 (51.5%)** were female.

was made up of:

399 children aged 0-15 years;516 people aged 16-39 years;820 people aged 40-64 years; and731 people 65 years and older.



neen 2007 and 2017 the population of Templepatrick Ward increased by 26 people or 1.1%.

le 1: Population Estimates by broad age bands, 2017

	Templepatrick Ward	Northern Ireland
l Population (2017)	2,466	1,870,834
dren (0-15 years)	399	390,684
ng Working Age (16-39 years)	516	579,782
er Working Age (40-64 years)	820	597,393
er (65+ years)	731	302,975
ulation Change % (2007-2017)	1.1%	6.2%

Figure 1: Population Estimates by broad age bands, 2017

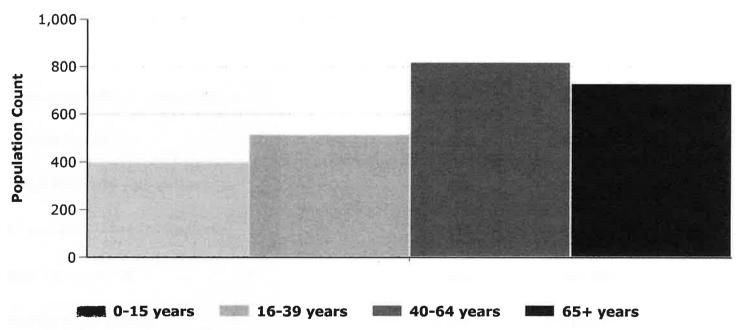
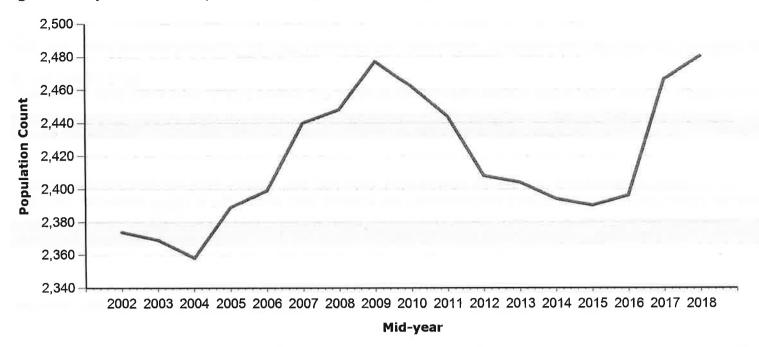


Figure 2: Population Trend, 2002 - 2017 (non-zero axis)



sets used: Population Estimates: Broad Age Bands (administrative geographies), NISRA Demographic Statistics

ther Information:

her information on Population Estimates including reports, methodolgy etc. can be found on the NISRA website.

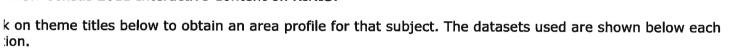
rmation on Components of Population Change and Migration are available on NINIS.

ractive content is also available to view under the Population theme.

Profile last updated July 2018

nsus 2011 Population Statistics for Templepatrick Ward

page provides information on the 2011 Census for **Templepatrick** Ward. Click on the blue tabs at the top to results for other geographical levels. Information has been grouped according to the Census themes. You can view Census 2011 Interactive Content on NINIS.



Usually Resident Population
Population Change
Households
Demography
Ethnicity, Identity, Language and Religion
Health
Housing and Accommodation
Qualifications
Labour Market



ially Resident Population

Census Day (27 March 2011) the usually resident population of Templepatrick Ward was 2,439 accounting for 0.13% of the NI total.

isets used: Usual Resident Population: KS101NI (administrative geographies), NISRA Census Office

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pulation Change

Mid-Year Estimates (MYE) of Population time series is the recommended source to examine population change over time. A new MYE series, incorporating the 2011 Census, has now been published by NISRA and is available on NINIS.

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useholds

Census Day 2011 there were **2,373** people **(97.29%** of the usually resident population) living in **1,004** households, giving an average sehold size of **2.36**.

isets used: <u>Usual Resident Population: KS101NI (administrative geographies)</u>, <u>Household Size: KS403NI (administrative geographies)</u>, NISRA Census :e

nography

Census Day 27th March 2011, in **Templepatrick** Ward:

- 15.42% were aged under 16 years and 23.94% were aged 65 and over;
- 48.18% of the usually resident population were male and 51.82% were female; and
- 47 years was the average (median) age of the population.

isets used: Age Structure - KS102NI (administrative geographies), Usual Resident Population - KS101NI (administrative geographies), NISRA Census

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nicity, Identity, Language and Religion

Census Day 27th March 2011, in **Templepatrick** Ward, considering the resident population:

- 98.07% were from the white (including Irish Traveller) ethnic group;
- **13.98%** belong to or were brought up in the Catholic religion and **77.53%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion; and
- **73.64%** indicated that they had a British national identity, **8.00%** had an Irish national identity and **30.46%** had a Northern Irish national identity*.

spondents could indicate more than one national identity

Census Day 27th March 2011, in **Templepatrick** Ward, considering the population aged 3 years old and over:

- 3.29% had some knowledge of Irish;
- 14.10% had some knowledge of Ulster-Scots; and
- 1.39% did not have English as their first language.

isets used: Ethnic Group - KS201NI (administrative geographies), Religion or Religion Brought Up In - KS212NI (administrative geographies), National tity (Classification 2) - KS203NI (administrative geographies), Knowledge of Irish - KS209NI (administrative geographies), Knowledge of Ulster-Scots - 10NI (administrative geographies), Main Language - KS207NI (administrative geographies), NISRA Census Office

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alth

Census Day 27th March 2011, in **Templepatrick** Ward:

- 18.98% of people had a long-term health problem or disability that limited their day-to-day activities;
- 83.60% of people stated their general health was either good or very good; and
- 13.69% of people stated that they provided unpaid care to family, friends, neighbours or others.

sets used: Health and Provision of Unpaid Care - KS301NI (administrative geographies), NISRA Census Office

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using and Accommodation

Census Day 27th March 2011, in Templepatrick Ward:

83.67% of households were owner occupied and 13.75% were rented;

51.69% of households were owned outright;

12.05% of households were comprised of a single person aged 65+ years;

4.18% were lone parent households with dependent children; and

 $\boldsymbol{6.57\%}$ of households did not have access to a car or van.

sets used: <u>Tenure and Landlord - KS402NI (administrative geographies)</u>, <u>Household Composition - KS105NI (administrative geographies)</u>, <u>Car or Van lability - KS405NI (administrative geographies)</u>, NISRA Census Office

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alifications

Census Day 27th March 2011, considering the population aged 16 years old and over:

35.14% had a degree or higher qualification; while

30.88% had no or low (Level 1*) qualifications.

'el 1 is 1-4 O Levels/CSE/GCSE (any grades) or equivalent

isets used: Qualifications and Students - KS501NI (administrative geographies), NISRA Census Office

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our Market

Census Day 27th March 2011, considering the population aged 16 to 74 years old:

63.70% were economically active, **36.30%** were economically inactive;

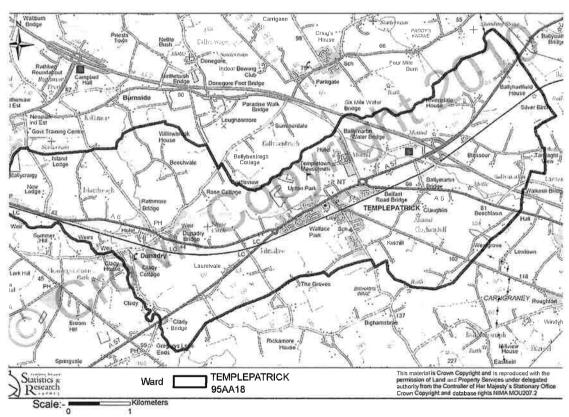
58.76% were in paid employment; and

1.92% were unemployed.

isets used: Economic Activity - KS601NI (administrative geographies), NISRA Census Office

ther Information: her information on the terms used in this profile can be found in the Census 2011 Definitions and Output Classifications document. *Profile last updated January 2013**

ographical Information for Templepatrick Ward



Wards are mostly equivalent to or are

There are 582 Wards in Northern Ireland. They are also referred to as

Electoral Wards.

a combination of Super Output Areas (SOAs), although in Moyle Local Government District 12 Wards are combined to form 6 Super Output Areas.

The 582 Wards join to form the 26 Local Government Districts (LGDs).

4,537 Small Areas (SAs) are combined to form Wards.

- Templepatrick ward can be defined as Rural*.
- **Templepatrick** ward is situated in the **Antrim** Local Government District.
- **Templepatrick** ward is situated in the **South Antrim** Assembly Area.
- Templepatrick ward is within Northern Health and Social Care Trust.

Templepatrick ward neighbours the following wards:

Doagh

Ballyrobert

Mallusk

Clady

Aldergrove

Parkgate

Farranshane

he Review of the Statistical Classification and Delineation of Settlements, March 2015