

**BY EMAIL & POST**18th September 2019

Our Ref: C04240

Development Plan Team
 Planning Department
 Mossley Mill
 Carnmoney Road North
 Newtownabbey
 BT36 5QA

Dear Sir/Madam,

**Re: Response to the Antrim and Newtownabbey District Council Draft Plan Strategy (DPS) –
 Lands located at Burn Road, Doagh**

This letter is submitted on behalf of our client, Mr Brian McBride, and relates to the publication of the Draft Plan Strategy (DPS), the second stage in Antrim and Newtownabbey's District Council's Local Development Plan process. It highlights how some draft policies are not sound and proposes how such policies could be amended to become sound. In addition to this we draw your attention to specific lands that we have identified as being suitable for housing in order to contribute towards meeting the housing need for the district as set out in the strategy.

Development Plan Practice Note 6 sets out 3 main tests of soundness for Local Development Plans, with each test having a number of criteria, as follows:

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?*
- 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?*

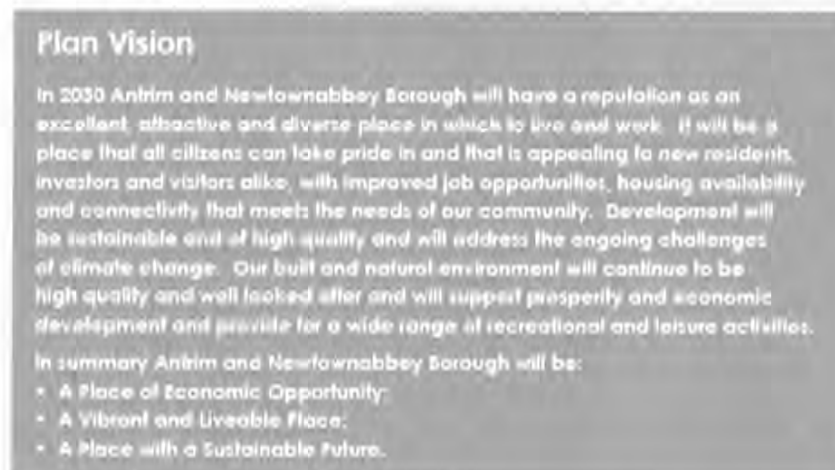
Consistency Tests

- 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;*
- 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; and*
- CE4 *It is reasonably flexible to enable it to deal with changing circumstances.*

Antrim and Newtownabbey District Council Vision



We **support** this vision as it shows the positive position the council area should take come 2030 and reflects the Council aspirations for the area to have improved job opportunities, house availability and connectivity that meets the needs of the community. It also sets out to be a place of economic opportunity that is vibrant and liveable with a sustainable future, making the Council area a better place in which to live and work over the plan period.

Strategic Objectives

On pages 58-59, Table 1 the council sets out 14 Plan Strategy Objectives broken up into three broad categories:

- Social – Sustainable Development
- Economic – A Place of Economic Opportunity
- Environmental – A Vibrant and Liveable Place

We are **generally supportive** of these 14 objectives in principle. Further discussion on the relevant strategic policies are discussed in detail below.

Spatial Growth Policy

We are **generally supportive** of the Spatial Growth Strategy set out below. Specifically, criterion (d) which aims to sustain and maintain the role of villages such as Doagh as centres providing opportunities for housing and employment of an appropriate scale and character to individual settlements.

Spatial Growth Strategy

- (a) Focus core growth in Metropolitan Newtownabbey and the Major Hub Town of Antrim, based upon existing committed development allocations and strengthen their roles as the primary locations for future housing and economic growth and investment within our Borough.
- (b) Consolidate and strengthen the role of the large town of Ballyclare based upon existing committed development allocations as a key centre for housing, employment, facilities and services to support a growing population and its wider rural hinterland.
- (c) Consolidate the role of the towns of Crumlin and Randalstown as local service centres for housing, employment, facilities and services to support the local population and their rural hinterlands.
- (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.
- (e) Sustain and maintain our rural area through the accommodation of suitable small-scale housing and employment opportunities in our hamlets and the countryside.
- (f) Strengthen the role of Belfast International Airport as a Regional Gateway and recognise the importance of Nutts Corner as a strategic location for employment on the Regional Strategic Transport Network.
- (g) Afford suitable protection to our Borough's natural and historic environment in accommodating growth and promote the provision of facilities, services and infrastructure necessary to meet local needs and improve connectivity.

Strategic Policy 2

We are **generally supportive** in principle of Strategic Policy 2 below, which seeks to create 9,000 new jobs over the plan period. However, we consider that this figure should be revised upwards in line with the uplifted figure for housing growth which is discussed in more detail under Strategic Policy 4 below.



Strategic Policy 2: Employment

Innovation, Investment and Enterprise

SP 2.1 The Council will encourage the growth of indigenous businesses, promote innovation and proactively attract investment into our Borough to support enterprise and increase employment for the benefit of all our residents. The Council will seek to facilitate the growth of up to 9,000 new jobs by 2030 and will operate a presumption in favour of employment-related development, provided it meets the requirements of Policy SP 2 and other relevant policies and provisions of the LDP.

Soundness Test

- Strategic Policy 2 is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) and it is not based on robust evidence (Test CE2). The creation of 9,000 jobs has been calculated based on the level of jobs required to sustain a projected housing growth of 9,750 homes over the plan period and therefore would not be adequate to sustain growth based on the suggested amendment of 11,220 homes in the district over the plan period.

Remedy

- Revise job creation figure upwards to around 10,000 jobs in line with our suggested revised housing growth figure.

Strategic Policy 4

Plan Strategy Objective 4 relates to Homes. SP 4.2 states that *“To provide for a sustainable level of housing growth and an adequate choice of housing the Council will seek to facilitate the delivery of at least 9,750 new homes across the Borough over the Plan period 2015 to 2030”*

The allocation of housing growth in each settlement is set out in the table below. However, we consider that it should be updated to reflect our suggested revised housing growth figure (11,220) and growth allocation between settlements should be amended to focus on grow local towns and selected village for the district over the plan period, as per Option 3 within the Preferred Options Paper. We also note that the below percentage of growth is not necessarily reflective of any of the growth rated within the options shown within the Preferred Options Paper and presents a new option.

LOCATION	GROWTH ALLOCATION	% OF GROWTH
Metropolitan/ Newtownabbey	3900	40.0
Antrim	2750	28.2
Ballyclare	1100	11.3
Crumlin	350	3.6
Randalstown	350	3.6
Ballynure	60	0.6
Ballyrobert	35	0.35
Burnside (Cogry/Kilbride)	50	0.5
Doagh	75	0.75
Dunadry	10	0.1
Parkgate	10	0.1
Straid	5	0.05
Templepatrick	100	1.0
Toome	55	0.55
Hamlets	150	1.5
Countryside	750	7.7
TOTAL	9750	100

Table 6: Allocation of Housing Growth 2015 to 2030

We consider that Option 3 within the Preferred Option Paper, with an overall growth figure of 14,960, is more appropriate to accommodate housing growth within the borough between 2015 – 2030 and the Draft Plan Strategy should therefore be amended to reflect this. Like the current figure in the draft strategy, it is higher than the most recent Housing Growth Indicator (HGI) figure for the council area indicated in regional guidance. It is however based on the pre-recession build-out rates and therefore gives a higher allocation which provides for greater flexibility than the current figure would otherwise allow.

This additional allocation is necessary due to the ambitious economic growth plans of the neighbouring council area of Belfast which seeks to add a further 46,000 jobs to the economy over the period 2020-2035 in line with the city's objective to enable it to compete with similar cities elsewhere in the UK in terms of attracting investment, creating jobs and driving the regional economy (Policy GR1, Belfast City Council Preferred Options Paper, January 2017, p19-22).

Many settlements within the Antrim and Newtownabbey Council area act as commuter towns for Belfast and considering the physical restrictions on growing the Greater Belfast area, it is inevitable that there will be knock-on effects upon Antrim and Newtownabbey settlements due to the ambitious growth plans of Belfast. It is therefore necessary to increase the number of dwellings allocated over the plan period for the Antrim and Newtownabbey Council Area to account for Belfast's planned economic growth. The 14,960-figure allocation (inclusive of 5-year land supply) would allow an addition 1,960 dwellings (an increase of 15%) and this should therefore be the reflective figure.

Such an approach is necessary and in line with statutory requirements under section 3(4) and 3(5) of The Planning Act 2011, which requires Councils to consider how the plans of neighbouring districts may affect the Council's own plans. It is also consistent with the Regional Development Strategy (RDS) which aims to "strengthen Belfast as the regional economic driver" and identifies that "Belfast drives much of the economic growth and shares its wealth across the region" (section 2.10). This is also echoed in paragraph 6.80 of the Strategic Planning Policy Statement (SPPS). The overall housing growth figure for the Antrim and Newtownabbey Council Area within the Draft Plan Strategy must therefore be increased in line with the below suggestions in red:

<i>Location</i>	<i>Draft Plan Strategy Growth Allocation (exclusive of 5-year land supply)</i>	<i>% of Growth Allocation</i>	<i>Draft Plan Strategy Growth Allocation (inclusive of 5-year Land Supply)</i>	<i>Suggested Increase to Draft Plan Strategy (exclusive of 5-year land supply)</i>	<i>Suggested % of Growth Allocation</i>	<i>Suggested Increase (inclusive of 5-year land supply)</i>
Metropolitan Newtownabbey	3900	40	5200	3813	34	5,060
Antrim	2750	28.2	3666	3028	27	4,025

Ballyclare	1100	11.3	1469		1368	12.2	1,840
Crumlin	350	3.6	468		561	5	748
Randalstown	350	3.6	468		561	5	748
Ballynure	60	0.6	78		150	1.34	201
Ballyrobert	35	0.35	45.5		68	0.61	92
Burnside	50	0.5	65		129	1.15	173
Doagh	75	0.75	97.5		171	1.53	230
Dunadry	10	0.1	13		51	0.46	69
Parkgate	10	0.1	13		51	0.46	69
Straid	5	0.05	6.5		21	0.19	29
Templepatrick	100	1.0	130		241	2.15	322
Toome	55	0.55	71.5		103	0.92	138
Hamlets	150	1.5	195		258	2.3	345
Countryside	750	7.7	1,001		646	5.76	863
Total	9,750	100%	13,000		11,220	100%	14,960

Soundness Test

- Strategic Policy 4 (SP 4) is not sound as it is not reasonably flexible to enable it to deal with changing circumstances i.e. unexpected growth (Test CE4) and it is not based on a robust evidence base (Test CE2). The projected housing growth of 9,750 underestimates the housing need for the district over the plan period, as detailed on page 5 of this submission.

Remedy

- Revise SP 4 to update the housing growth figure to provide 11,220 new homes within the district by 2030.

Policy DM17 'Homes in Settlements'

We are generally supportive of Policy DM17 set out below. Although, we note the introduction of criterion (d) in particular which relates to 'Lifetime Homes'. The policy states that for proposals of 20 units or more, a minimum of 20% must comply with the 'Lifetime Homes' approach.

As we understand it, the Lifetime Homes standard provide a model for building accessible and adaptable homes capable to accommodate all ages. Although, we support the Lifetime Homes approach, we do not think it should be a planning requirement. In England for example, the Lifetime Homes Standard was once a planning requirement, however, it has since been abolished and built into updated Building Regulations (Requirement M4(2) and/or M4(3)). We believe the same approach should be taken here within Northern Ireland. Lifetime Homes would also create yet another design challenge at planning application stage which may not be achievable on all sites, specifically those which are constrained in terms of size.

Policy DM 17: Homes in Settlements

DM 17.1 The Council will support proposals for quality and sustainable residential development in settlements, where they do not contribute to town cramming, and where the following criteria are met:

- (a) The number of units proposed respects the scale and size of the settlement. Well-designed higher density proposals will be considered favourably at accessible locations within Metropolitan Newtownabbey and our other towns, to make best use of our existing infrastructure and services; and also encouraged as part of the development of large scale new housing schemes on zoned sites;
- (b) In villages and hamlets the design and layout of new housing schemes should reflect the density, character and form of the existing settlement;
- (c) All new residential developments must provide a range of housing of different types and sizes, well integrated as part of the overall scheme ensuring that the siting and design is appropriate to the location and does not conflict with the character of the area;
- (d) For proposals of 20 units or more, a minimum of 20% must comply with the 'Lifetime Homes' approach, where this facilitates wheelchair accessibility, to ensure that new developments are accessible to all and will assist in the creation of a more balanced community;
- (e) A movement pattern is provided that promotes walking and cycling routes and supports linkages to nearby community facilities and public transport (see also Policy DM 12);
- (f) Adequate provision is made for necessary local neighbourhood facilities, to be provided by the developer as an integral part of the development; and
- (g) A Design and Access Statement shall accompany any housing development of 10 or more units (see Policy SP 6 Placemaking and Good Design).

DM 17.2 In assessing residential development proposals the Council will take account of the supplementary planning guidance document, *Creating Places – Achieving Quality in Residential Developments*, (DOE/DRD, May 2000)

Soundness Test

- Policy DM17 (criterion d) is not sound as it is not based on a robust evidence base (Test CE2) and at planning stage mechanisms for monitoring of building to the lifetime homes standard is not clear (Test CE3)

Remedy

- Revise DM17 to remove lifetime homes as a planning requirement and ensure it is brought forward under the authority of Building Regulations.

Policy DM17.3 relates to Affordable Housing. The policy states that *“the Council will only permit a residential development of 40 units or greater, where a minimum of 10% of the total units, are provided as affordable housing. Where a proposed site has been artificially subdivided to be less than the threshold identified under this policy, the proposal will not be supported by the Council.”*

Whilst we support the delivery of affordable homes in the Council Area. We consider that a case could be made that the threshold for affordable housing be introduced once the proposals meet or exceed the 'major residential development' threshold comprising 50 residential units or more. Setting the provision of affordable housing threshold to major developments is also an approach which has been widely used in England.

In addition, similar to the approach used in the Northern Area Plan 2016, we believe that there should be a second test in that proposals should be required to contribute to meeting the needs of the wider community, only where there is an established need for social or specialist housing, as established by a Housing Needs Assessment. Where the Housing Needs Assessment establishes there is a need in an identified settlement or within a locality for social or specialist housing, affordable housing should be provided subject to the level of need identified and in agreement with the Northern Ireland Housing Executive.

Soundness Test

- Policy DM17.3 is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) and it is not based on a robust evidence base (Test CE2).

Remedy

- Revise DM17.3 so that affordable homes provision is only required on 'major residential development' that comprises 50 units or more and/or where there is an identified level of need in agreement with NIHE.

Monitoring & Review

The Local Development Plan is intended to be a flexible document which responds to changing needs and circumstances locally. Monitoring will therefore be essential for the delivery of the local development plan and should provide the basis to trigger any requirement to amend the strategy, policies and proposals of the Plan.

Therefore, we broadly support the monitoring indicators set out in in pages 310-318, which are to be used to measure how well the plan is performing in terms of achieving its strategic objectives, including ensuring an adequate supply of housing for the district over the plan period. The table below provides a detailed explanation of each monitoring indicator.

Indicative Monitoring Framework

Policy (Where we want to be)	The Outcomes that we want	The Indicators we will use to monitor the desired Outcomes
Sustainable Development		
Policy SP1: Sustainable Development	Adopted LDP documents providing Strategic and Detailed Policies for development management, and proposals for site allocations and local designations	Adoption date of the Active and Newham Valley LDP 2030.
	Sustainable development in accordance with the adopted LDP	The number of planning applications permitted and refused by development type. The number of planning applications notified to Df and the total no. of applications called in by Df. The number of planning applications allowed by the Planning Appeals Commission (PAC)
	Growth in jobs, homes, infrastructure and services in the Borough in line with the direction set out in the Sports Growth Strategy.	The level of growth and amount of physical development that occurs in the Place of the Borough.

Policy (Where we want to be)	The Outcomes that we want	The Indicators we will use to monitor the desired Outcomes
A Place of Economic Opportunity		
Policy SP2: Employment	Innovation and investment will be encouraged with growth of up to 3,000 new jobs by 2030	Economic Health Check considering a range of existing economic indicators for the Borough, including employment figures. The number of planning applications permitted for economic development of 500m ² or greater. Estimated level of investment and job growth associated with the approval of Major planning applications.
	A supply of sufficient land is maintained for future economic development	The amount of employment land available for development in Strategic Employment Locations and Local Employment Sites.
	Strong protection is afforded to the Borough's Strategic Employment Locations.	The number of planning applications permitted for alternative non-conforming uses in SLLs and the amount of land for area of floor space lost.
	The vitality and viability of our Town Centres is maintained and enhanced	Town Centre Health Checks considering a range of indicators, such as vacancy rates and level of pedestrian footfall. The number of Major planning applications permitted for retail development and complementary uses of 500m ² or greater on sites outside the defined hierarchy of retail centres. The number of planning applications permitted for retail development and complementary uses of 500m ² or greater on sites outside the defined hierarchy of retail centres.

A Place of Economic Opportunity (continued)

Policy SP3: Employment	A vibrant and sustainable tourism economy.	The number of planning applications permitted for new tourism facilities and accommodation in the Borough. Tourism Health Check considering a range of existing tourism indicators, such as event visitor numbers and overnight stays in the Borough.
Policy SP4: Transportation & Infrastructure	Improved accessibility within and to and from the Borough.	The number of strategic transport schemes / improvements delivered by Df, including the extension of the Railfast Rapid Transport - Glider and improved trunk road linkages.
	A reduced need to travel and modal shift from the use of the private car to sustainable modes of transport including buses, walking and cycling.	The number of planning applications permitted: (a) for Park & Ride / Park & Shop schemes. (b) incorporating cycling facilities. (c) with Active Travel Plans. The development of Greenways and new cycle paths. Vehicle risk statistics for the Borough.
	Improved digital connectivity through fast and reliable Wi-Fi, fibre optic broadband and mobile broadband.	Bandwidth of broadband across the Borough. The number of 'Not-Spots' in the Borough.
	Adequate public utilities and infrastructure is provided to enable sustainable growth and economic investment in the Borough.	The amount of capacity available in WWTs and ongoing liaison with other major utilities providers.

A Vibrant and Liveable Place (continued)

Policy SP5: Planning and Design	Development of high quality, attractive and sustainable places within our Borough.	The proportion of Major planning applications permitted in the Borough where Policy SP6 2 is cited as a reason for granting permission. The proportion of planning applications for 10 dwellings or more and non-residential development of 500m ² or greater accompanied by a Design and Access Statement.
Policy SP6: Heritage	Boost the loss of, strengthen the protection of, and promote improvements to heritage assets and their settings.	Changes to designation of heritage assets. Change in number of heritage assets at risk in the Borough. The number of development proposals permitted involving heritage assets contrary to advice received from DfC Historic Environment Division.

A Place with a Sustainable Future

Policy SP7: Natural Heritage	Protect and enhance the diversity of our Borough's natural heritage comprised of its habitats, species, landscapes and earth-science features.	Changes to designation of natural heritage assets. Condition of natural heritage assets within the Borough. The number of development proposals permitted impacting on natural heritage assets contrary to advice received from DfC Natural Environment Division.
Policy SP8: Natural Resources	Sustainable use of mineral resources.	The number of development proposals permitted for mineral development. The number of development proposals for surface development permitted within Mineral Reserve Policy Areas.
	More power derived from a diverse range of renewable energy technologies employed across the Borough.	The number of development proposals permitted for renewable energy technologies by type. The amount of energy (MW) by technology type produced from renewable sources.
Policy SP9: Flood Risk	Minimise flood risk in new development.	The number of development proposals permitted in identified Flood Risk Areas.
	Increased use of sustainable drainage systems (SuDS) as the preferred method of treating surface water for new development proposals.	The number of development proposals permitted that incorporate SuDS.
	Increased recycling of waste.	The number of new or extended waste management facilities permitted. The amount of waste recycled within the Borough.

However, projected housing figures, the number of future jobs predicted, and the Strategic Policies specified above should be amended as required in order to enable accurate monitoring of the plan.

Soundness Test

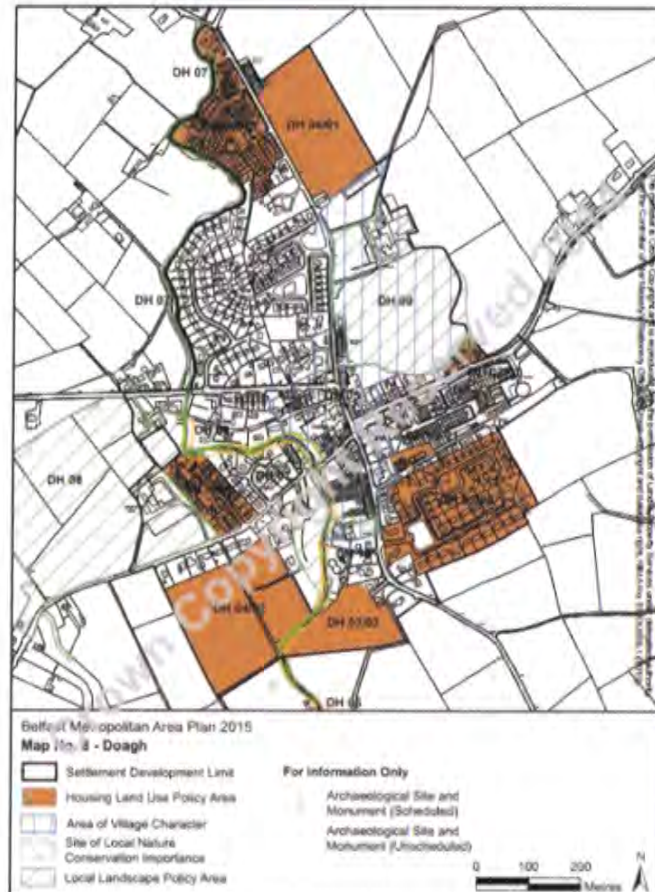
- SP2 and SP4 are not sound under which the success of the plan is being assessed and are not based on robust evidence (Test CE2).

Remedy

- Revise as per previous recommendations.

Land Availability in Doagh and Proposed Site for Inclusion within the Settlement Limits of Doagh

On review of land availability within Doagh, there are only three undeveloped zoned residential sites within the settlement limit (zoning DH03/03, DH04/01 and DH04/02). Permission was granted in June 2014 for 164 units on zonings DH03/03 and DH04/02 (approval ref. U/2011/0128/F). Leaving only zoning DH04/01 to sustain growth over the plan period.



There is no planning history or record of permission being granted for zoning DH04/01 over the current plan period (i.e. during the lifetime of BMAP). The lack of any recent or previous planning application(s) or permission(s) for these lands suggests that there is an issue with bringing forward development proposals for these lands. As such, the current zoning DH04/01 cannot be relied upon to provide the 88 units identified for the site over the plan period.

Published back in June 2018, the 2018 Housing Monitor (Appendix 1) for the borough identifies that Doagh has enough “potentially suitable” lands to accommodate 271 housing units (10.87ha). The Housing Monitor itself uses the term “potentially suitable” to describe the lands it identifies as part of the housing supply. The use of this term acknowledges that not all sites identified in the Monitor are deliverable. Therefore, alternative suitable lands that can more readily be developed should be considered by the Council to deliver a sufficient supply of housing over the plan period.

The Local Policies Plan will bring forward settlement limits for each of the settlements and allocate land, where appropriate, for new homes and employment to meet the identified needs of our

Borough in a sustainable manner. It will also bring forward a range of local designations that will help steer overall growth and development.

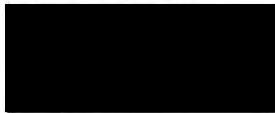
Given the settlements proximity to the main M2 transport corridor and its direct links to Belfast, we would argue that a higher growth rate is needed for the settlement. An increased allocation will also contribute to the economic prosperity of Doagh itself, as a thriving village.

The sites identified in this submission (Appendix 1) are within Doagh. As detailed in the initial POP submission, the lands received favourable consideration at the BMAP inquiry and were considered suitable for development. Furthermore, they directly abut existing zonings DH03/03 and DH04/02 that recently obtained planning permission. There is the opportunity now to bring the subject lands within the settlement limit and zone for housing, consolidating the growth in Doagh to the south of the settlement.

It is clear from the points set out above that the attached lands are appropriately located to accommodate projected housing growth within Doagh, in a manner that retains its compact urban form, and we would respectfully request that their inclusion is considered during the forthcoming stages of Local Development Plan preparation.

We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as the LDP progresses.

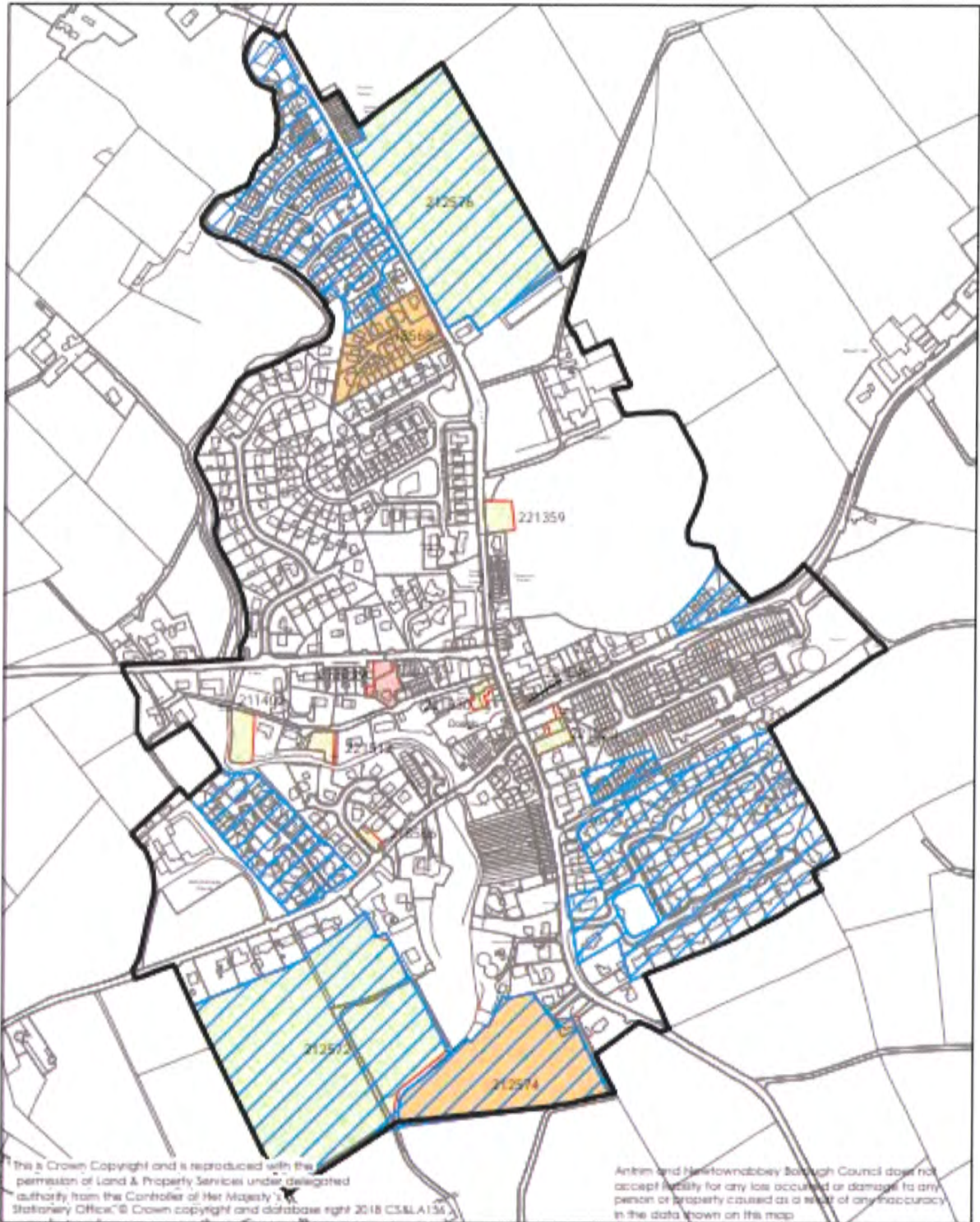
Yours Sincerely



Lisa Shannon

Gravis Planning

Appendix 1
2018 Housing Monitor



Doagh Housing Monitor 2018

- COMPLETE IN 17/18 SURVEY YEAR
- DEVELOPMENT ON-GOING
- NOT STARTED
- HOUSING ZONING/HOUSING LAND USE POLICY AREA

0 125 250 Metres



REMAINING POTENTIAL	UNITS BUILT IN 17-18	AREA DEVELOPED in 17-18 (ha)	AREA REMAINING (ha)
273	5	0.18	10.87



Appendix 2

Potential Site for Inclusion within Doagh Settlement Development Limit

