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Forward Planning Team  
 Antrim and Newtownabbey Borough Council  
 Mossley Mill  
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 BT36 5QA

**BY HAND & E-MAIL**

20 September 2019

Our Ref: JAC1000

E: [conor@clydeshanks.com](mailto:conor@clydeshanks.com)

Dear Sir/Madam,

**REPRESENTATION TO LOCAL DEVELOPMENT PLAN (LDP) ANTRIM & NEWTOWNABBEY DRAFT PLAN STRATEGY, LANDS AT CARRICKFERGUS ROAD, BALLYNURE (MR WILSON JACKSON)**

We write on behalf of our client Mr. Wilson Jackson in relation to the Council's recently published draft Plan Strategy. This representation relates to the strategic theme of housing, and also provides commentary on our client's lands at the Carrickfergus Road, Ballynure – see **Annex 1 for Site Location**.

The purpose of this representation is to set out our client's intention to have lands brought within the settlement development limit (SDL) of Ballynure and zoned for housing in the new plan period 2030.

**Introduction**

The draft Plan Strategy (dPS) published in July 2019 sets out a range of strategic planning issues and is the second formal publication in the preparation of the LDP for the Antrim & Newtownabbey (A&N) council area. The dPS aims to stimulate public comment and facilitate meaningful engagement with the preparation of the LDP in order to help identify relevant local issues which should be considered at the outset.

The dPS is one of two development plan documents which, when combined with the Local Policies Plan (LPP) will form the LDP for the Borough.

As stated above, this representation focuses on the strategic theme of housing as well as the Spatial Growth Strategy which takes direction set by the Regional Development Strategy (RDS) in order to ensure that settlements within the Borough are sustainable to live, work and visit.

This representation provides commentary on the strategic key issues of the settlement hierarchy, housing growth and housing allocation.

Recognising that the preparation of the LDP is still on-going and future components of the LDP are forthcoming, our client reserves the right to comment further on the subsequent LDP publications.

Note this representation follows on from our previous representation to the Council's Preferred Options Paper (POP) submitted on 06 March 2017 reference POP/PR/012 (see **Annex 1**).

### Site Context

The site borders the southern edge of the SDL of the Village of Ballynure, is circa, 3.5 ha in the size and comprises part developed (milking parlour / agricultural buildings, access and curtilage) and part undeveloped agricultural land.

The site is bordered by a mixture of hedgerows, post / wire fencing and palisade fencing to the south, east and west boundaries. The site sits immediately adjacent residential development and a butcher's shop to the north. The sites topography gently rises from the Carrickfergus Road before falling toward the west and southern boundaries.

There has been further level change in the last 10 years with regrading having taken place to accommodate infrastructural (road) works.

### Strategic Matters

#### *Spatial Growth Strategy*

Ballynure is identified as a 'Village' (Tier 5) in the proposed settlement hierarchy (Table 1: The Places of our Borough, A&N dPS p66). Page 65 of the dPS for A&N under Strategic Objective (d) aims to;

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

#### *Housing Allocation*

It is noted that Strategic Policy (SP) 4.2 *Housing Growth and Allocation* seeks to facilitate the delivery of at least 9,750 new homes across the Borough over the Plan period 2015 – 2030 (Antrim & Newtownabbey dPS SP 4.2 p134).

The new housing allocation proposes an approximate split of 750 units to be allocated to the rural area and 9,000 units to be allocated in the various settlements in the Borough. This is based on an average build out rate of 650 dwellings per annum multiplied by the plan period of 15 years (see Table 1 below).

Table 1 LDP 2030 Housing Growth Figures 2015 – 2030

1	HGI average build rate		554
2	Pre-crash build rate		748
3	Housing Growth average build rate	average of rows 1 and 2	650
4	Housing growth 2015-2030	Row 3 x 15 years	<b><u>9750</u></b>

Source: Evidence Paper 6; Housing p27

It is recognised that the new housing allocation results in a significant reduction (3250 units) from the previous figure proposed in the Council's Preferred Options Paper (POP) of 13,000 units over the plan period.

This reduction in housing allocation comes as a result of the removal of a 5 year housing land supply being incorporated at the end of the plan period.

It is recommended that the housing allocation afforded to the Borough maintains this 5 year housing land supply as originally proposed at POP stage in order to facilitate an adequate and available supply of housing at the end of the plan period.

The provision of a 5 year housing land supply provides a sound approach to a balanced distribution of housing across the Borough and will facilitate the delivery of housing demand beyond and during the period at which the plan enters its monitoring stage and can be zoned accordingly for same at the LPP stage.

Alternatively given that the current progress of LDP publications which is not in line with the proposed timetable (as revised in July 2018), from our analysis it's likely the LPP will not become adopted until quarter 4 2025/26. At present this will only allow a shelf life of four years before the plan expires. Therefore, extending the plan period to at least 2031 will allow for a minimum of 5 years to pass before the 5 year review / monitoring period commences. However, not do either could potentially leave the Council exposed with a shortfall of available housing land at the end of the plan period.

While it is accepted that the Council are not intending to undertake any de-zoning during the preparation of the LDP it cannot be guaranteed that existing zonings identified in the draft / adopted Belfast Metropolitan Area Plan (dBMAP / BMAP) will come forward for development either due to deliverability issues, market conditions and/or land owner appetite.

It is also understood that the Council intend to undertake a full assessment of the deliverability of existing zonings at LPP stage, however this exercise could prove futile if there is no mechanism to de-zone sites that are not likely to be developed.

Therefore, in order to ensure that there will be an available capacity remaining (that is likely to come forward for development) at the end of the plan period the Council should give serious consideration to increasing the total housing allocation incorporating the 5 year housing land supply.

### *Ballynure Housing Allocation*

The dPS for A&N proposes a housing allocation of 60 units for Ballynure (a reduction of 115 units from POP stage) over the plan period based on a build out rate of 650 units per annum representing approximately 0.6% of the total housing allocation (*Table 6: Allocation of Housing Growth 2015 – 2030, A&N dPS p135*).

As alluded to in the previous section, it is recommended that the Council re-introduce the 5 year housing land supply to ensure a sound and balanced approach for housing distribution across the Borough particularly after the notional end date of the plan period in 2030. This will ensure that the Council will not run the risk of running out of adequate and available housing land supply and the end of the plan period particularly if previous trends continue whereby many of existing housing zonings do not come forward for development.

This is illustrated in Table 12 of Evidence Paper 6: Housing where approximately 21% / 2088 units (uncommitted zonings) of the existing housing zonings have not come forward for development since they were originally zoned in the old Antrim Area Plan 1984 - 2001 and therefore are very unlikely to contribute to the housing growth during the plan period (see **Annex 2**).

### **Site Specific Matters**

The following sets out the high level merits of the land and proposal for progressing this site as a candidate for additional housing lands in Ballynure.

The site, bound by the SDL to the north (housing, butchers shop, church) and east (Carrickfergus Road and dwellings at Nos. 21 and 23), Ballynure Link Road to the south and hedgerow to the west, represents an opportunity to 'round off' the SDL of Ballynure. Furthermore, the topography of the site is such that while cut/fill will be required, will not require extensive retaining structures.

In terms of any environmental constraints, it is clear that this site is the optimum location for new housing in the revised SDL of Ballynure given that it is absent from any flood plain and/or built heritage matters which impacts on alternative sites bordering the SDL of Ballynure to the north, north east and east. Furthermore, access arrangements were validated by a roads engineer in February 2017 for up to 60 units.

Consequently, by bringing this land within the SDL it offers an enabling opportunity for these operations to relocate and develop out this site with a landuse compatible with development to the north and east.

Given the above, we consider that this location represents a site which, can in part, address the shortfall in housing land in Ballynure. The design exercise illustrates that the site has a capacity to absorb at least 60 units (based on 20 dph) while still providing for open space, access, and buffer boundary planting to the west and south.

I trust this representation is clear in setting out our advocacy of the strategic matters and our intention moving forward to advocate the said lands.

Should you require any further information and/or clarification, please do not hesitate to contact me.

Yours sincerely,



Conor Cochrane  
**Senior Planner**

Enc.

cc. Mr Wilson Jackson

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## ANNEX 1

### PREFERRED OPTION PAPER REPRESENTATION

Mr. John Linden  
Antrim and Newtownabbey Borough Council  
Planning Section  
Mossley Mill  
Carnmoney Road North  
Newtownabbey  
BT36 5QA

## BY POST

06 March 2017

Our ref: JAC1000

E: [thomas@clydeshanks.com](mailto:thomas@clydeshanks.com)

Dear Sirs,

### **ANTRIM AND NEWTOWNABBEY LOCAL DEVELOPMENT PLAN (LDP) 2030 – PREFERRED OPTIONS PAPER (POP) REPRESENTATION: LANDS AT CARRICKFERGUS ROAD, BALLYNURE (JACKSONS)**

I refer to the above matter and now enclose our representation relating to lands at Carrickfergus Road, Ballynure, Co. Antrim on behalf of our client Messrs John and Wilson Jackson.

The purpose of the representation is to set out our client's ambition to have the lands brought within the settlement development limit (SDL) of Ballynure and zoned for housing for the new plan period 2030 based upon the findings of the POP, Housing Growth Indicators and A&N Council Local Development Plan 2030 Evidence Paper Meeting the Needs of Society January 2017.

#### **Site Context**

The site (see Annex 1) bounds the southern edge of the SDL of the village of Ballynure. The site, circa. 3.5ha in size (8.6 acres) comprises part developed (milking parlour/agricultural buildings, access and curtilage) and part undeveloped agricultural land.

The site is bordered by a mixture of hedgerows, post/wire fencing and palisade fencing to the south, east and west boundaries. The site sits immediately adjacent residential development and a butchers shop to the north. The site's

topography gently rises from the Carrickfergus Road before falling toward the west and south boundaries. Notably, there has been further level change in the last 10 years with regrading having taken place to accommodate infrastructural works – see below.

## Strategic Matters

We advocate A&N Council's Preferred Options for 'Housing Allocation and Distribution' (HAD) and 'Grow Local Towns and Selected Villages' (GLTSV).

The Council has adopted a balanced approach by preferring Option (4) for HAD which advocates 13,000 dwellings (average 650 per annum plus additional 5 year land supply) predicated on average build rate and HGI rate over the new plan period which takes cognisance of the Housing Growth Indicators (HGIs) provided by DfI against pre-recession build rates. This is a common sense approach pursuant to the SPSS objective of facilitating an adequate and available supply of quality housing to meet the needs of everyone and is to be welcomed.

We further advocate the Council's preferred Option (1) regarding GLTSVs. In particular, we consider growing the local 'selected' village of Ballynure (Option 1 – forecast 175 additional units required, shortfall of 148 added to the 27 unit extant supply) as an obvious candidate. The table below articulates how the Council calculated this figure.

Site ID	Potential units	Units complete	Remaining potential	Built 14/15	Site area	Area developed	Area developed 14/15	Remaining	Status
218553	6	1	5	0	0.153	0.02	0	0.133	Dev ongoing
219775	22	13	9	8	0.39	0.3	0.2	0.09	Dev ongoing
219776	1	0	1	0	0.07	0	0	0.07	Dev ongoing
218140	4	0	4	0	0.13	0	0	0.13	Not started
218555	2	0	2	0	0.098	0	0	0.098	Not started
219777	6	0	6	0	0.26	0	0	0.26	Not started
			27	8			0.2	0.8	

Ballynure Housing Monitor 2015 (source: A&N Council dated Jan 2017 'Annual Housing Monitor 2015')

Ballynure presents an optimum village for growth given its commuting distance to Belfast, Metropolitan Newtownabbey, Antrim and Larne, location on arterial routes and growing population which has resulted in a shortfall of future land Supply. We recognise that the preferred options for the HAD and GLTSV are subject to change but

even when framed against the alternative mainstream options presented by the Council ensures that Ballynure is a settlement that will secure additional land moving forward into the new plan period, if not before then.

We further consider that the baseline figures (27 units of current land supply) presented for Ballynure to be since superseded from when the Council undertook their empirical survey in 2015 and therefore as of March 2017, there is plainly not the land supply envisaged or required to accommodate the interim period required to adopt the new plan.

We acknowledge that supply is not a static figure and anticipate that the Council will address same post receiving the DfI recommendations/view on the Councils POP and receipt of representation on strategic matters.

Our review, based on site inspections, shows that the supply remaining appears completely depleted.

Site ID	Potential units	Units complete	Remaining potential	2017 Note	2017 Remaining potential
218553	6	1	5	Built	0
219775	22	13	9	Built	0
219776	1	0	1	Built	0
218140	4	0	4	Removed – see below	0
218555	2	0	2	Yield is 'like for like'	0
219777	6	0	6	Built	0
			27		0

The baseline figure requires review due to:

1. recent construction of committed sites since March 2015 (when the Council reviewed building control completions);
2. zoning BNE03/01 will not be developed. This land is under the control of our client and will not be developed given that this land is used for the butcher shops carpark and is required for the future expansion of their business;
3. the initial projected new plan adoption programme has overrun.

In closing, we advocate the Councils preferred respective options, Option 4 relating to HAD and Option 1 relating to GLTSV particularly for the selected village of Ballynure for the new plan period. We also consider that the figures

presented for Ballynure show an obvious shortfall in the short term prior to the new plan being adopted and therefore a housing moratorium.

### Site Specific Matters

The following sets out the high level merits of the land. The site, bound by the SDL to the north (housing, butchers shop, church) and east (Carrickfergus Road and dwellings at Nos. 21 and 23), Ballynure Link Road to the south and hedgerow to the west, represents an opportunity to 'round off' the SDL of Ballynure. Furthermore, the topography of the site is such that while cut/fill will be required, will not require extensive retaining structures.

Notably, during the last area plan process, Belfast Metropolitan Area Plan 2015, while the client made representation (to have the land brought within the SDL of Ballynure) it was ruled out by the PAC on the grounds that the holding would yield in excess of the required number of units and as the site sat higher topographically than the extant village it would appear prominent.

Since then we understand that further regrading has been carried out and an initial design exercise carried out by an architect in February 2017 demonstrates that the required cut/fill would not result in any significant retaining but simply rebalancing of the overburden on site for natural regrading and a proposal which comprises single and/or one-and-a-half storey house type would not appear prominent.

Photomontages, which the PAC were not provided with during the Public Inquiry into dBMAP, will accompany a site specific representation as and when required to allay any concerns regarding same.

Furthermore, the previously developed part of the site used as farm buildings/operations is bound by housing immediately to the north and while our client objected to the proposal at the time (U/2012/0253/F) permission was granted and the development since constructed.

The proximity of the new development sits 'cheek by jowl' with the milking parlour, which involves the mixing of slurries and has resulted in significant complaint – in short, the relationship between land uses is incompatible and indeed the Council have acknowledged this matter (see Annex 2).

Consequently, by bringing this land within the SDL it offers an enabling opportunity for these operations to relocate and develop out this site with a landuse compatible with development to the north and east.

In terms of any environmental constraints (see Annex 3), it is clear that this site is the optimum location for new housing in the revised SDL of Ballynure given that it is absent from any flood plain and/or built heritage matters which impacts on alternative sites bordering the SDL of Ballynure to the north, north east and east. Furthermore, access arrangements were validated by a roads engineer in February 2017 for up to 60 units.

Given the above, we consider that this location represents a site which, can in part, address the shortfall in housing land in Ballynure. The design exercise illustrates that the site has a capacity to absorb at least 60 units (based on 20 dph) while still providing for open space, access, and buffer boundary planting to the west and south.

I trust this representation is clear in setting out our advocacy of the strategic matters and our intention moving forward to advocate the said lands.

Should you require any further information and/or clarification, please do not hesitate to contact me.

Yours sincerely,



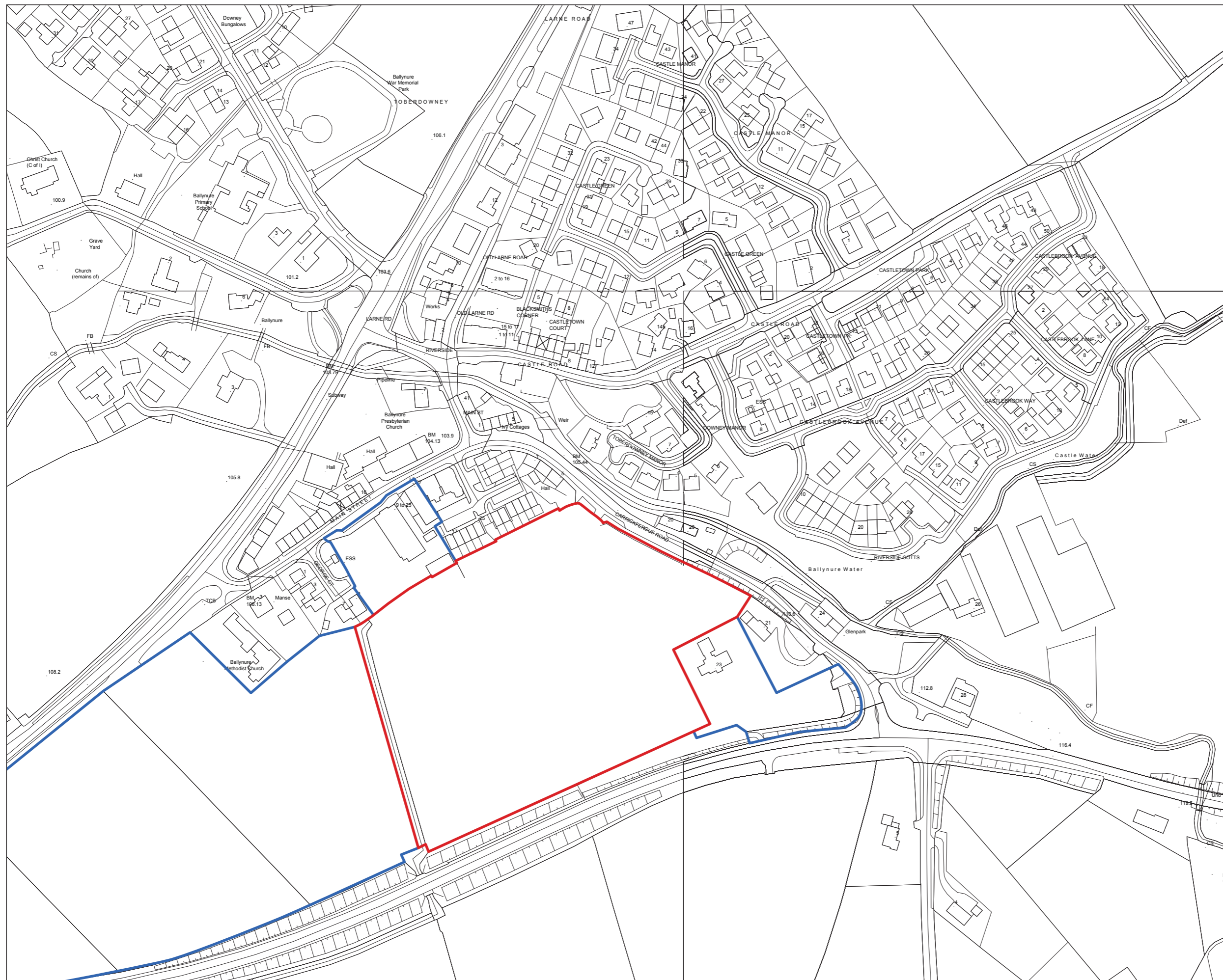
Thomas Bell

**Associate**

Enc.

cc. Mr Wilson Jackson

Annex 1 – Site Location Plan



1 March 2017  
Scale 1:2500 @ A3

**Annex 2 – A&N Council Correspondence Aug 2016**



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Mr M Gordon  
Turley Associates Ltd  
Hamilton House  
3 Joy Street  
Belfast  
BT2 8LE

Your ref: JACB3001  
Our Ref: LA03/2016/0271/PAD

Date: 5 August 2016

Dear Mr Gordon,

**Proposal: PAD Submission - Site for residential development**  
**Location: Lands to the south of 17-25 Ballad Mews and 5-10 Gulliver's Lane,**  
**Carrickfergus Road, Ballynure, BT39 9PZ.**

I refer to your letter of 15th March 2016 regarding the above noted matter.

Antrim and Newtownabbey Borough Council Planning Section have visited the site and acknowledge the close juxtaposition of the existing intensive agricultural activity with the newly constructed residential development to the north.

At this time there is limited information available to Planning Section to assess the potential or otherwise for nuisance related complaints arising due to the evident relationship.

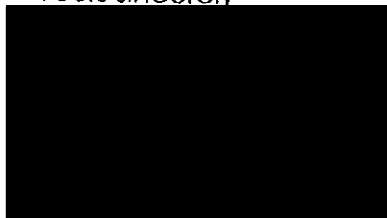
Notwithstanding this point Planning Section considers the principle of the development could be acceptable if a demonstrable planning gain can be established. Accordingly the identification of an alternative location for the intensive agricultural activity would be a significant material consideration in assessing a planning application.

To that extent additional information would be required regarding the proposed location of the existing activity and evidence that the proposed re-development is a proportionate response to the relocation of the existing intensive agricultural activity.

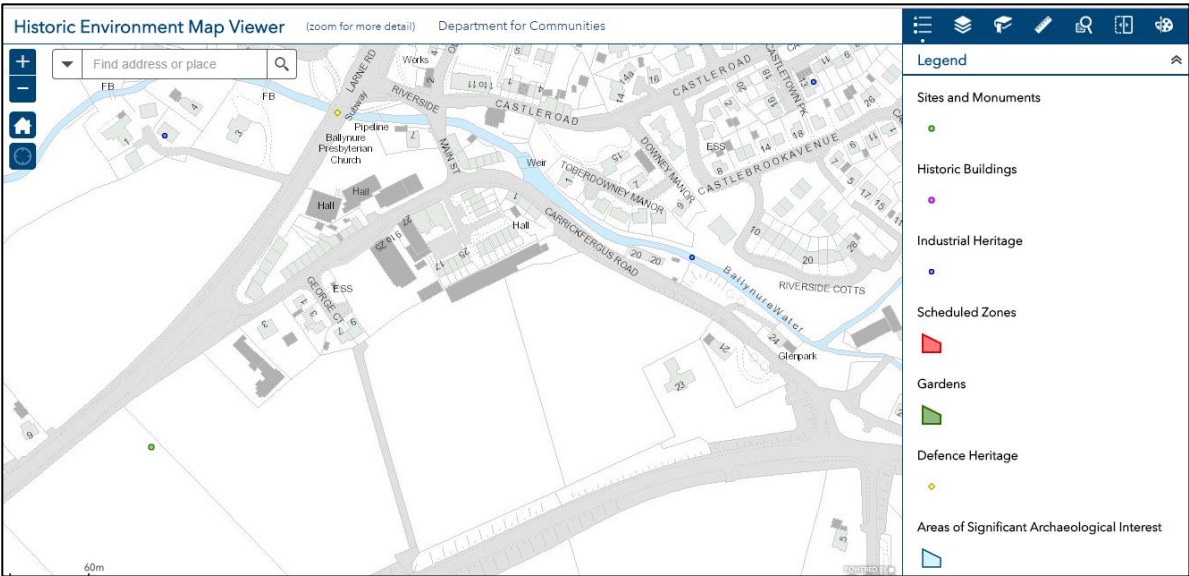
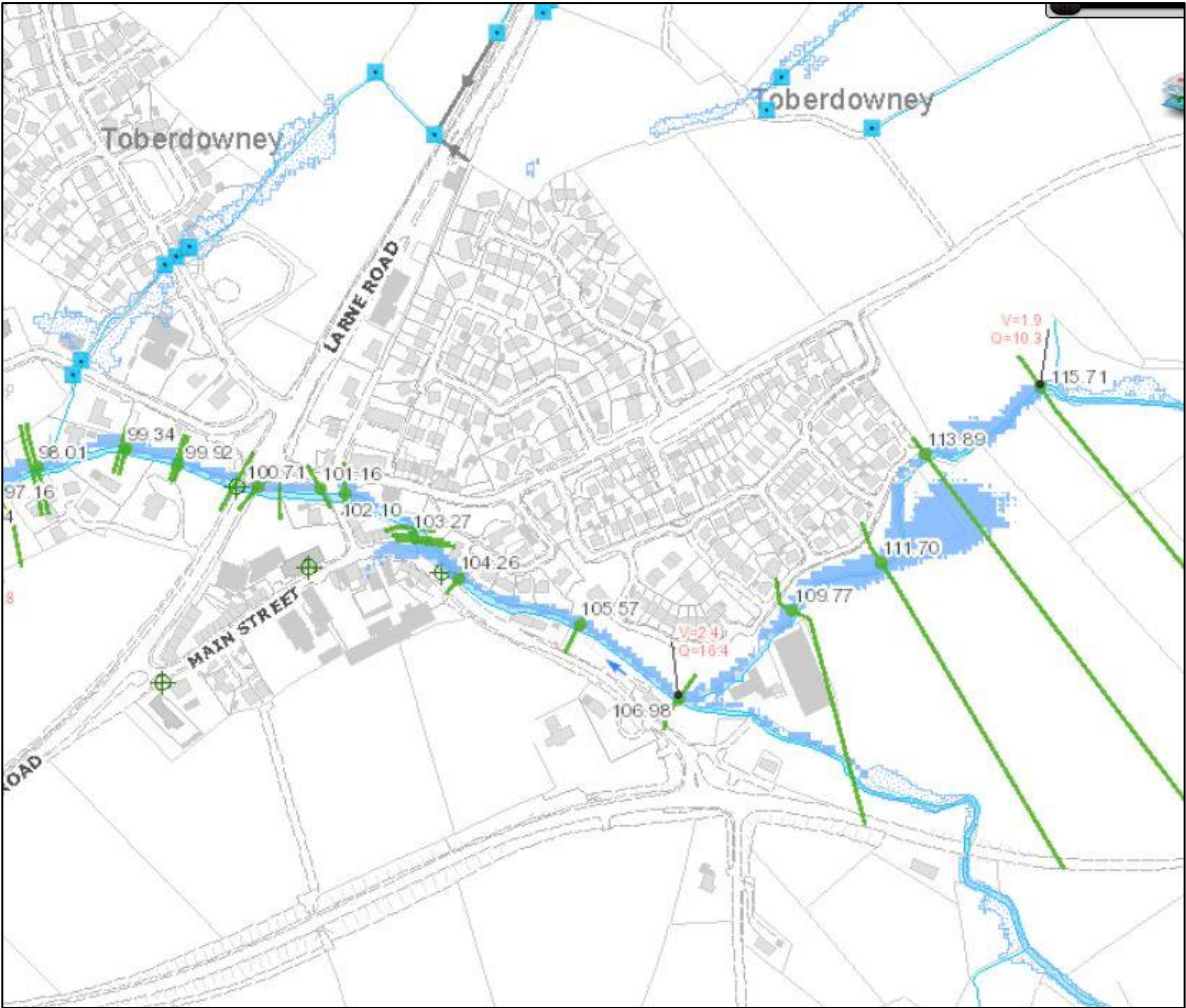
In considering this matter Council has consulted its Environmental Health Section and also Transport NI, Historic Environment Division and NIEA Drainage and Water. A copy of these responses has been included for your information and consideration on a without prejudice basis.

Council now considers the matter to be closed. Should you wish to discuss this matter again in the future contact details are set out above.

Yours sincerely



Annex 3 – DAERA Strategic Flood Map and Built Heritage Extracts



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## ANNEX 2

### TABLE 12 ANTRIM & NEWTOWNABBEY DPS (EVIDENCE PAPER 6)

		COMMITTED RESIDENTIAL UNITS						POTENTIAL ADDITIONAL UNITS				TOTAL POTENTIAL UNITS
Location	Housing Allocation	Built since 2015	Extant Units - Site Commenced	Extant Units - Site Not Started	Uncommitted Zoning	Windfall	Sub-total	Urban Capacity	Uncommitted Greenfield	DOS	Sub-total	TOTAL
Metropolitan Newtownabbey	3900	637	1650	622	1114	549	4572	717	30	n/a	747	5319
Antrim	2750	232	1155	1494	100	252	3233	787	1292	n/a	2079	5312
Ballyclare	1100	176	417	1998	701	90	3382	44	85	n/a	129	3511
Crumlin	350	99	176	14	0	117	406	25	0	n/a	25	431
Randalstown	350	13	130	179	68	63	453	139	59	n/a	198	651
Ballynure	60	15	8	1	0	n/a	24	n/a	n/a	0	0	24
Ballyrobert	35	29	22	13	2	n/a	66	n/a	n/a	14	14	80
Burnside	50	13	15	1	33	n/a	62	n/a	n/a	60	60	122
Doagh	75	15	51	131	70	n/a	267	n/a	n/a	0	0	267
Dunadry	10	0	5	19	0	n/a	24	n/a	n/a	0	0	24
Parkgate	10	11	6	13	0	n/a	30	n/a	n/a	23	23	53
Straid	5	0	0	0	0	n/a	0	n/a	n/a	3	3	3
Templepatrick	100	31	86	42	0	n/a	159	n/a	n/a	53	53	212
Toome	55	10	175	19	0	n/a	204	n/a	n/a	219	219	423
Hamlets	150	29	86	38	n/a	n/a	153	n/a	n/a	142	142	295
Countryside	750	750 (2015-30)	n/a	n/a	n/a	n/a	750	n/a	n/a	n/a	n/a	750
TOTAL	9750	2060	3982	4584	2088	1071	13785	1712	1466	514	3692	17477