

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

Our Ref: C04200

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 Neillsburn Plantation, Templepatrick**

This letter is submitted on behalf of our client, Corbo Properties, 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?*

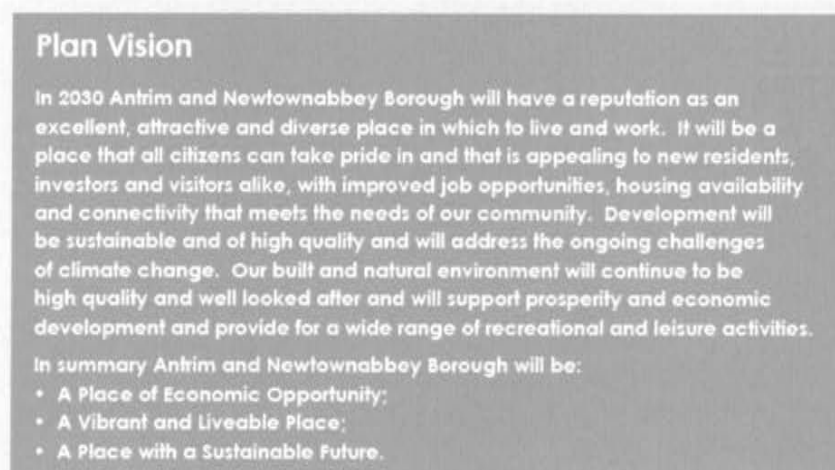
Consistency Tests

- 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 Templepatrick 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 growing 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 rates 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 Arkin and Newfennaby 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 refused to DE and the total no. of applications called in by DE.
		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 Spatial Growth Strategy.	The level of growth and amount of physical development that occurs in the Places of the Borough.

A Place of Economic Opportunity (continued)		
Policy (Where we want to be)	The Outcomes that we want	The Indicators we will use to monitor the desired Outcomes
Policy SP2: 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 overall visitor numbers and overnight stays in the Borough.
		The number of strategic transport schemes / improvements delivered by DE, including the extension of the Belfast Rapid Transport - Outer and Inscribed Link Road bridges.
		The number of planning applications permitted (a) for Park & Ride / Park & Share schemes; (b) incorporating cycling facilities; (c) with Active Travel Plans.
Policy SP3: Transportation & Infrastructure	Improved accessibility within and to and from the Borough.	The development of Greenways and new cycle paths.
		Vehicle trip statistics for the Borough.
		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.
		Bandwidth of broadband across the Borough.
Policy SP4: Community Infrastructure	Adequate public utilities and infrastructure is provided to enable sustainable growth and economic investment in the Borough.	The number of 'Hot Spots' in the Borough.
		The amount of capacity available in WWWs and ongoing liaison with other major utilities providers.
		Improved digital connectivity through fast and reliable Wi-Fi, fibre optic broadband and mobile broadband.

A Vibrant and Liveable Place (continued)		
Policy (Where we want to be)	The Outcomes that we want	The Indicators we will use to monitor the desired Outcomes
Policy SP5: Placemaking and Good 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: Historic Environment	Resist 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.

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 jobs growth associated with the approval of Major planning applications.
		A supply of sufficient land is maintained for future economic development.
Policy SP3: Natural Resources	Strong protection is afforded to the Borough's Strategic Employment Locations.	The amount of employment land available for development in Strategic Employment Locations and Local Employment Sites.
		The number of planning applications permitted for alternative non-conforming uses in SELs and the amount of land for area of four special land.
		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 other main town centre uses and the area of new floor space (m ²) created.
Policy SP4: Community Infrastructure	The vitality and viability of our Town Centres is maintained and enhanced.	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.

Policy (Where we want to be)	The Outcomes that we want	The Indicators we will use to monitor the desired Outcomes
A Vibrant and Liveable Place		
Policy SP5: Housing	Sustainable growth of 9,750 new homes between 2015 - 2030.	The number of new homes completed in the Borough by settlement and in the countryside.
		A 5 year supply of land for housing.
		The amount of housing land available for development in the Borough's settlements.
		A choice of homes living built in the Borough to (a) address the need for social and affordable housing; and (b) help meet the needs of residents over a lifetime.
Policy SP6: Community Infrastructure	Access is available to education, health, community and recreational facilities that meet the needs of our residents.	The number of new homes completed in the Borough by tenure.
		The number of planning applications for 20 dwellings or more that include a proportion of the dwellings designed to 'lifetime homes' standard.
		The number of planning applications permitted for the redevelopment of community facilities including open space to alternative uses.
		The number of planning applications permitted for the development of new community facilities.
Policy SP7: Environmental Protection	Increased use of sustainable drainage systems (SuDS) as the preferred method of treating surface water for new development proposals.	The level of usage of the Borough's recreational facilities and liaison with key service providers in relation to appropriate indicators for maintaining the capacity of the Borough's education, health and community facilities.
		The number of planning applications permitted that incorporate SuDS.

A Place with a Sustainable Future		
Policy (Where we want to be)	The Outcomes that we want	The Indicators we will use to monitor the desired Outcomes
Policy SP8: 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.
Policy SP9: Natural Resources	Sustainable use of mineral resources.	The number of development proposals permitted impacting on natural heritage assets contrary to advice received from DfC Natural Environment Division.
		The number of development proposals permitted for mineral development.
Policy SP10: Environmental Protection	More power derived from a diverse range of renewables energy technologies employed across the Borough.	The number of development proposals permitted for surface development within Mineral Reserve Policy Areas.
		The number of development proposals permitted for renewable energy technology by type.
Policy SP11: Environmental Protection	Minimise flood risk in new development.	The amount of energy (MW) by technology type produced from renewable sources.
		The number of development proposals permitted in identified Flood Risk Areas.
Policy SP12: Environmental Protection	Increased recycling of waste.	The number of development proposals permitted that incorporate SuDS.
		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.

Housing land availability within the Settlement Limits of Templepatrick

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.

Table 12 within the Councils Housing Evidence Paper (Appendix 2) suggests 159 units can be catered for within committed sites in Templepatrick and a further 53 additional units have been identified within 'Development Opportunity Sites' resulting in 212 potential units. However, on the basis of the arguments set out within Strategic Policy 4 above, the Housing Growth figure for Templepatrick should increase to an allocation of 322 (inclusive of 5-year land supply) for the plan period 2015 – 2030.

Published back in June 2018, the 2018 Housing Monitor (Appendix 1) for the borough identifies that Templepatrick has enough "potentially suitable" lands to accommodate 176 housing units (8.35ha). 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 and highlights that a 5-year supply cannot be maintained.

A review of the lands within Templepatrick carried out by Gravis Planning identified that there are currently no available lands suitable for development within the current settlement limit to accommodate any future housing growth, therefore it is evident that additional lands will be required within the next plan period or indeed before.

The remaining land within the settlement limit have been assessed. Three sites were identified as seen in the mapping below. Site 1 located south of Antrim Road comprises lands associated with a private dwelling and is not available for housing. Site 2 to the west of Lylehill Green is a committed site with 105 dwellings currently been built out and Site 3 located to west of Kiln Park is also committed with 41 also being constructed on site.



Overall, it is considered that a 5-year supply of land for housing has not been maintained within both the Council area and Templepatrick and there are limited land opportunities within the current settlement limit, given that the lands identified are already built out, committed or unavailable to build on. Therefore, it is evident that more lands to accommodate future growth within the next plan period will be required.

Proposed Site for Inclusion within the Settlement Limits of Templepatrick

Given the settlement's 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 Templepatrick itself, as a thriving village.

The site identified in this submission (Appendix 3) is within Templepatrick. The site is located on lands to the north of Antrim Road, Templepatrick and is located to the north of the village. This site is located between two residential developments (Knightswood and Kingscourt), which are both within the current development limit. A laneway is located between Knightswood and the western boundary of the site. The site is accessed from the Antrim Road and extends to approximately 3ha. The site falls gently away from the public road, with a 1.5m high stone wall forming the south roadside boundary, a stream runs along the north and western boundaries. A number of trees are located within the site and a sewage works is located to the North West adjacent to the site.

The attached lands are appropriately located to accommodate projected housing growth within Templepatrick in a manner that retains its compact urban form, as the site is located in an area that would "round off" the existing settlement limit. In addition to these extensive surveys carried out by the landowner such as tree surveys, flooding, ecology and traffic have proven that development can be accommodated on the site. Therefore, we would respectfully request the sites inclusion is considered during the forthcoming stages of Local Development Plan preparation. We look forward to the consideration of our comments and the specific lands identified by the Area Plan team in their forthcoming preparation of the Local Development Plan for the Antrim and Newtownabbey Council Area.

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 Data

Sector	Units Complete 91-94-17 to 31-03-18	Area Developed (Hectares) 91- 94-17 to 31-03- 18	Units Dev. Within the Urban Footprint (%) 01- 04-17 to 31-03- 2018	Remaining Potential (Hectares)	Remaining Potential (Dwelling Units)
Newswaterbury Metropolitan, Inc. that part of Greenfield within ANBC					
Urban Footprint	112	4.29		99.76	2373
Greenfield	56	2.47		58.15	1429
TOTAL	168	6.76	67	157.96	3802
Anttrim (Town)					
Urban Footprint	58	3.73		41.13	1081
Greenfield	36	0.85		60.19	1561
TOTAL	134	4.58	73	121.32	3042
Ballyclare					
Urban Footprint	19	1.39		12.66	429
Greenfield	81	5.45		140.29	2853
TOTAL	100	6.84	19	152.95	3282
Crumlin					
Urban Footprint	16	0.52		7.64	191
Greenfield	10	0.36		4.21	109
TOTAL	26	0.88	62	11.85	300
Randallstown					
Urban Footprint	6	0.27		11.99	312
Greenfield	0	0		13.85	244
TOTAL	6	0.27	100	25.84	556
Villages					
Ballykeaton	0	0		0.37	8
Ballymore	5	0.14		0.55	14
Ballyrobert	6	0.28		3.19	64
Corry/Killade	9	0.44		3.98	123
Dough	5	0.18		10.87	271
Parlagate	8	0.38		1.07	21
TOTAL	33	0.65		9.05	216
Templepatrick	13	0.65		8.35	176
Tonine	2	0.07		14.08	345
Small Settlements					
Ballycor	0	0		0.63	5
Ballycrilly	0	0		0.17	1
Bruslee	0	0		0.2	2
Craigiarogan	2	0.2		0.8	7
Craggan/Cranfield	10	0.32		4.93	109
Dunsady	0	0		5.6	80
Groggan	0	0		0.58	21
Hillhead	0	0		1.29	10
Killad	0	0		0.57	13
Kilgarnock	0	0		0.08	1
Lownton	0	0		0.2	2
Milnesh	1	0.1		1.85	17
Mullown	8	0.35		2.37	38
Moneyglass	0	0		0.5	13
Roughfort	4	0.17		0.57	8
Tildarg	0	0		0	0
Villages and Small Settlements Total	73	3.46		62.87	1350
DISTRICT TOTAL	867	22.8		632.8	13342



SITE ID	POTENTIAL	UNITS COMPLETE	REMAINING POTENTIAL	BUILT IN 17/18	SITE AREA	AREA DEVELOPED	AREA DEVELOPED 17/18	AREA REMAINING	STATUS	COMPLETION DATE
20685	1	1	0	1	0.12	0.12	0.12	0	COMPLETE	01-Apr-18
113006	0	0	1	0	0.01	0.01	0	0	DEVELOPMENT ON-GOING	
114523	1	0	1	1	0	0.36	0	0	DEVELOPMENT ON-GOING	
114688	2	1	1	1	0	0.4	0.2	0.2	DEVELOPMENT ON-GOING	
114714	105	24	81	32	4.7	1.07	0.53	3.63	DEVELOPMENT ON-GOING	
221696	1	0	1	1	0	0.1	0	0.1	DEVELOPMENT ON-GOING	
221511	1	0	1	1	0	0.07	0	0	DEVELOPMENT ON-GOING	
113468	1	0	1	1	0	0.07	0	0	DEVELOPMENT ON-GOING	
113674	39	0	39	0	1.9	0	0	1.9	NOT STARTED	
113782	2	0	2	0	0.17	0	0	0.17	NOT STARTED	
113958	29	0	29	0	1.04	0	0	1.04	NOT STARTED	
114746	1	0	1	0	0.1	0	0	0.1	NOT STARTED	
114792	5	0	5	0	0.2	0	0	0.2	NOT STARTED	
114833	3	0	3	0	0.28	0	0	0.28	NOT STARTED	
115011	3	0	3	0	0.12	0	0	0.12	NOT STARTED	
115126	2	0	2	0	0.17	0	0	0.17	NOT STARTED	
221518	3	0	3	0	0.1	0	0	0.1	NOT STARTED	
TOTAL			176	33			0.95	8.35		

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Appendix 2
Housing Evidence Paper 6 – Potential Housing Yield Figures

Table 12: Total Potential Housing Yield in the Borough 2015 to 2030

Location	Housing Allocation	COMMITTED RESIDENTIAL UNITS						POTENTIAL ADDITIONAL UNITS				TOTAL POTENTIAL UNITS
		Built since 2015	Extant Units - Site Commenced	Extant Units - Site Not Started	Uncommitted Zoning	Windfall	Sub-total	Urban Capacity	Uncommitted Greenfield	DOS	Sub-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

Appendix 3
Potential Site for Inclusion within Templepatrick Settlement Development Limit

