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02 December 2019

Dear Sir / Madam,

**RE: Historic Environment Division Counter Representation to representations made in reference to Antrim and Newtownabbey Draft Plan Strategy**

Historic Environment Division (HED) has reviewed the representations made to Antrim and Newtownabbey Borough Council and provide general statement on the following representations:

Prefixed by LA03/DPS  
 0038, 0089, 0091, 0092, 0093

HED advise our previous comments, on soundness of the historic environment policy approach in the draft Plan Strategy (dPS), remain unchanged (see ref: LA03/DPS/0032).

To aid council to remain sound under the **Consistency Test (C3)** and **Coherence and effectiveness test (CE2)** at Local Policies stage of plan making we comment as follows:

HED consider the dPS to be the inappropriate stage to include the specific identification of lands, this should be through the Local Policies Plan stage of the process.

The above listed representations have all included location maps indicating parcels of land which authors wish to be considered for development lands, residential or otherwise. Within these representations either screen shots of the HED historic map viewer or reference to this viewer have been provided, stating (or similar) *"no built heritage within site"* or *"no site constraints concerning built heritage/ the historic environment but adjacent to historic..."* HED advise that this is an insufficient assessment of how potential zonings for development are deemed to impact heritage assets and their settings. The point datasets utilised from the HED

historic map viewer are positional to identify a recorded heritage asset, however, simply because the identification point is not within a proposed zoning does not automatically mean the heritage asset can be neglected in consideration or that site constraints do not need to be considered to protect the heritage asset, e.g. the identification point highlights a specific heritage asset only – monument, building, shipwreck, historic park and so on. The assets themselves and their understanding in the landscape will be much more extensive, e.g. an identification point will not represent an asset measured 60m across, or its associated descriptive survey text, or its full extent that is/was visible, or could be extrapolated from earlier map evidence. This is where and why a robust assessment of the evidence base is necessary. Evidence should include as a minimum more detailed analysis of the wider portfolio of data held by HED when approaching new zonings for development, along with use of historic maps, and landscape character assessment to ensure appropriate recognition of the heritage asset and its setting and how its environment is understood, experienced, seen and enjoyed and so on.

HED reiterate, when council are considering specific identification of lands the council utilise the appropriate and necessary historic environment baseline evidence to inform land zonings for development. Council must be in a position to demonstrate how this has been taken into account, and how it has been used in informing potential forms of mitigation such as appropriate designation or other appropriate key site requirements e.g. evaluation and identification, of previously unidentified archaeological remains.

In conclusion, Historic Environment Division advise the above comments are toward ensuring that land zoning is carried out in accordance with the requirements of soundness under the Consistency test (C3) and Coherence and Effectiveness Test (CE2). Given the insufficient nature of assessment in relation to the historic environment we consider that the zonings put forward in the above referenced representations are not based on robust evidence and would not meet this soundness test.

Yours sincerely,

  
Senior Inspector of Historic Monuments

  
Senior Architect

**Heritage Records & Designations Branch**

**Cc** [REDACTED] (HED Assistant Director)  
[REDACTED] (HED Assistant Director)