part of the WYG group



On Behalf of Private Client Lands at Parkgate, Antrim

Representation to Antrim and Newtownabbey Borough Council Local Development Plan 2030 - Draft Plan Strategy

September 2019

creative minds safe hands



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1.0 Introduction

- 1.1 This representation to the Antrim Newtownabbey Borough Council ('ANBC') Local Development Plan 2030 ('LDP') Draft Plan Strategy Document ('DPSD') is made on behalf of an individual, who represents lands at Parkgate and builds upon the previous submission on their behalf in relation to ANBC Preferred Options Paper ('POP') made in April 2017.
- 1.2 As per the previous POP submission, in considering this representation, it is important to note that our client has land at Parkgate which will be made available for future housing development and with associated open space, playground, sports pitch and free public car park (an Indicative Sketch Site Concept Masterplan is at **Appendix 1**).
- 1.3 On behalf of our client we comment on the ANBC DPSD on the following pages. For ease and to assist Council, this response follows the format of Council's *Local Development Plan 2030 Draft Plan Strategy Response Form* and sets out:
 - 2.0 Section A Data Protection and Consent;
 - 3.0 Section B Your Details; and
 - 4.0 Section C Representation.
- 1.4 Should Council have any queries or wish to discuss this submission we would be happy to do so.
- 1.5 We reserve the right on behalf of our client to expand and supplement this submission in due course in response to any relevant Counter Representations that may be submitted to the Draft Plan Strategy stage of the LDP process and also to comment further at the Draft Local Policies Plan stage.



2.0 Section A – Data Protection and Consent

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

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

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

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

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

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

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

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

Email - <u>DPO@antrimandnewtownabbey.gov.uk</u>

Phone - 028 9446 3113



3.0 Section B - Your Details

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

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

(Please select only one item)					
	Individual				
	Organisation				
✓	Agent				

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4.0 Section C – Representation

- 4.1 This representation relates to the following parts of the Draft Plan Strategy Document:
 - Section 3: Plan Vision & Strategic Objectives (Paragraphs 3.1 -3.15, Pages 53-60);
 - Section 4: Sustainable Development

 Strategic Policy 1: Sustainable Development

 Settlement Hierarchy (Page 71);
 - Section 4: Sustainable Development
 Strategic Policy 1: Sustainable Development
 Spatial Growth Strategy (Paragraphs SP1.6 SP1.7, Pages 63 66);
 - Section 7: Homes

 Strategic Policy 4: Homes

 Housing Growth and Allocation (Paragraphs SP4.1-SP4.3, Pages 134-135, 137-138);
 - Section 7: Homes
 Strategic Policy 4: Homes
 Policy DM17: Homes in Settlements (Paragraphs 7.30 7.42, Pages 142 147);
 - Section 8: Community Infrastructure (Pages 168) & Strategic Policy 5;
 - Section 8: Community Facilities Policy DM 24: Community Facilities (Page 176-179)

 Paragraphs 8.21 to 8.27; and
 - Section 9: Placemaking and Good Design
 Strategic Policy 6: Placemaking and Good Design
 Policy DM 25 Urban Design (Pages 187-188);
- 4.2 Our client is broadly in support of a number of areas of the DPSD which we comment on below at **paragraphs 4.3** to **4.65**. However, there are also a number of areas of the DPSD which our client considers to be Unsound and these are discussed at **paragraphs 4.46** to **4.91** below.



If you consider the draft Plan Strategy to be 'SOUND' and wish to support the draft Plan Strategy, please set out your comments below.

4.3 Our client considers that the DPSD is sound in several areas which we comment on below.

Section 3 - Plan Vision & Strategic Objectives (Paragraphs 3.1 -3.15, Pages 53-60)

4.4 Our client supports the Plan Vision and Strategic Objectives as set out at **Section 3 (Pages 53-60)** of the DPSD, in particular that part of the vision which states:

"In 2030 Antrim and Newtownabbey Borough will have a reputation as an excellent, attractive and diverse place in which to <u>live</u> and work. It will be a place that all citizens can take pride in and that is appealing to <u>new residents</u>, investors and visitors alike, with improved job opportunities, <u>housing availability and connectivity that meets the needs of our community</u>".

[underlining emphasis]

- 4.5 If the Plan Vision is to be delivered, it is important that the correct Strategic Objectives are pursued. In particular, our client welcomes and supports a number of the Strategic Objectives detailed within the DPSD. These include:
 - Strategic Objective 1 which aims to: *Promote sustainable growth by managing development and securing new infrastructure provision in our settlements and countryside to meet the needs of all our citizens*;
 - Strategic Objective 8 which aims to: *Ensure a sufficient supply of land for new homes,* provide a diverse choice of housing and strengthen community cohesion; and,
 - Strategic Objective 9 which aims to: Accommodate and promote well-designed and accessible community, education and health facilities.
- 4.6 As set out, our client represents lands at Parkgate which, if brought within the Settlement Development Limit ('SDL'), can be made available for housing development and associated open space, playground, sports pitch and free public car park. Delivery of such uses on the lands will assist in providing a



sufficient supply of land for housing and community facilities as a part of the plan objectives (refer to **Appendix 1**).

4.7 Within the SDL of Parkgate some housing has been built in recent years and very limited areas of undeveloped land remain. This is confirmed in Council's *Evidence Paper 2: Settlement Evaluation, June 2019* under its assessment of Parkgate where it states that there are only:

"a small number of potential development sites within the existing settlement development limit".

- 4.8 This reinforces that additional land requires to be identified for Parkgate and is supported by the housing allocations indicated within the DPSD and Council's *Evidence Paper 6: Housing* which identifies a total of 10No. units for Parkgate for the period to 2030.
- 4.9 In achieving *Strategic Objective 9* and facilitating the other objectives referenced above, appropriate land must also be identified within the LDP in order to accommodate necessary community facilities across the plan area.
- 4.10 A shortfall and lack of a central public car park, a play park, sports pitch and general amenity space in Parkgate has been consistently raised by the Parkgate Community Group. It is our client's position that if their lands are brought within the SDL for Parkgate, they will be developed holistically and with the vision of creating a high quality development which also provides relevant community infrastructure through appropriate open space areas, play areas and potentially, given the lands central location in Parkgate, an appropriate area of free public car parking for the center of the Village. This will help to address identified deficiencies in community facilities in Parkgate whilst also assist in sustaining and maintaining its role as a Local Service Centre.
- 4.11 Therefore in order to meet the Plan Vision and Strategic Objectives for the ANBC LDP, further land must be brought within the SDL of Parkgate. Our client's lands can assist in this regard by delivering additional lands to accommodate housing and necessary community facilities thereby facilitating the Plan Vision and Strategic Objectives.



Section 4

<u>Strategic Policy 1: Sustainable Development</u> Settlement Hierarchy (Page 71)

- 4.12 Given the current position of Parkgate as a Village within the **Antrim Area Plan 1984 2001 ('AAP')** our client is very supportive of the proposed Settlement Hierarchy within the DPSD which seeks to retain Parkgate as a Village.
- 4.13 Council's *Evidence Paper 2: Settlement Evaluation, June 2019* provides details in terms of evaluating and classifying the various settlements within the ANBC area. It states at its **paragraph 7.14** that:

"Therefore, there is a need to bring forward a simplified and rational settlement hierarchy which takes account of the RDS, the varying population levels and the role and function of each of the settlements".

- 4.14 Such factors as population, role, function and services have all been considered as part of the settlement evaluation for Parkgate within Council's Evidence Paper 2. Indeed, Parkgate is extremely well provided for in terms of local services and transportation/connectivity and is in an extremely sustainable location as confirmed by the assessment within the Council's Evidence Paper 2. The proposed Settlement Hierarchy and the assessment of and retention of Parkgate as a Village within the DPSD has been appropriately assessed in line with the RDS and is sound.
- 4.15 Our client therefore supports the proposed Settlement Hierarchy in so far as it relates to Parkgate being retained as a Village within the ANBC LDP.

Section 4

<u>Strategic Policy 1: Sustainable Development</u> <u>Spatial Growth Strategy (Paragraphs SP1.6 – SP1.7, Pages 63 - 66)</u>

4.16 Given the current position of Parkgate as a Village within the **AAP** and its proposed retention as such within the DPSD, our client is supportive of the proposed Spatial Growth Strategy, in particular, point (d), which states:



"(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".

- 4.17 In order to sustain and maintain such functions and roles of Villages it will be important to ensure that there is sufficient land provided to facilitate future housing growth and assist in this regard. The opportunity for new housing sites must be provided, especially in Parkgate. As indicated, if our client's lands are brought within the SDL of Parkgate, they will be made available for housing development and associated community facilities, in doing so, this will help maintain and sustain Parkgate Village as a Local Service Centre. Its existing Local Service Centre function provides a local convenience store, restaurant, pub, Chinese takeaway, hairdressers and chip shop to the Village and the wider rural area.
- 4.18 In comparison to other Villages, Parkgate is well provided for in terms of local services with a number of shops, as well as a church and associated church hall (used by the local community) and a primary school, all located within the Village. It is also well located centrally within the Council area with excellent connectivity to the M2 motorway to the South West and south towards Metropolitan Newtownabbey/Belfast and east and to Antrim town to the west, Ballyclare and other with Doagh, and Ballynure to the East.
- 4.19 It has better connectivity than many of the surrounding nearby villages such as Dunadry and Ballyrobert, which are located further away from the M2 and, in the case of Dunadry, requires travel through the Village of Templepatrick before reaching the motorway which can often be hindered by long traffic queues within Templepatrick itself.
- 4.20 As such, Parkgate is a wholly sustainable location for future growth given its existing facilities, transport connections and existing infrastructure. Our client's lands are therefore excellently placed to assist in providing for future housing and if brought within the SDL for Parkgate, will therefore help facilitate the proposed Spatial Growth Strategy set out within the DPSD and consolidate and strengthen the Village's sustainable position within the ANBC area whilst also maintaining and sustaining its role as a centres providing opportunities for housing and employment.
- 4.21 A map showing Parkgate in context with other surrounding settlements and its connectivity is at **Appendix 2**.



Section 7

Strategic Policy 4: Homes

Housing Growth and Allocation (Paragraphs SP4.1-SP4.3, Pages 134-135, 137-138)

4.22 Our client is broadly supportive of the approach taken by ANBC in respect of determining housing growth figures and allocations and in particular, *Strategic Policy 4: Homes* which under *SP 4.1* states:

"In order to provide a choice of housing for people in socially balanced and inclusive communities across the Borough, the Council will apply a presumption in favour of the development of new homes provided applications meet the requirements of Policy SP 4 and other relevant policies and provisions of the LDP".

4.23 It also states under **SP 4.2**:

"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".

4.24 Our client is also supportive of the view expressed at **paragraph 7.7** of **page 137** of the DPSD in relation to housing growth levels that states:

"The Council estimates that 9,750 new housing units will be required for the period 2015 to 2030 across the Borough. It is however important to understand that this figure is neither a target to be met, nor a cap which cannot be exceeded. Furthermore, the estimation of future housing growth is not an exact science and a degree of judgement is therefore considered essential in identifying an appropriate level of housing growth over the Plan period".

4.25 This clearly indicates that ANBC is aware that a level of flexibility needs to be applied to housing growth figures during the plan period.



4.26 Our client agrees that this provides a balanced approach and one with a reasonable amount of flexibility to assist in delivering required housing figures and also assist in achieving the LDP's Strategic Objectives.

Strategic Policy 4: Homes

Policy DM17: Homes in Settlements (Paragraphs 7.30 - 7.42, Pages 142 - 147)

4.27 **Policy DM17** of the **DPSD** relates to Homes in Settlements. The aim of this policy is to:

"promote the development of high quality, attractive and sustainable homes within settlements, which meet the present and future needs of all sections of the population within the Borough".

4.28 The provision of the policy is supported in broad terms by our client. In particular **Criterion (b)** of **Policy DM17.1** relates to new housing development in villages and hamlets and states:

"In villages and hamlets the design and layout of new housing schemes should reflect the density, character and form of the existing settlement".

- 4.29 Our client supports use of the word 'Should' in that it provides an element of flexibility within the policy and it is recommended that it be retained as part of any final adopted policy.
- 4.30 **Criterion (c)** requires that:

"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";

4.31 Our client welcomes this criterion in that it will ensure a mix of housing types, tenures and sizes within settlements thereby helping to assist in delivering sustainable development proposals. It is recommended that it be retained as part of any final adopted policy.



4.32 **Criterion (f)** requires that:

"adequate provision is made for necessary local neighbourhood facilities, to be provided by the developer as an integral part of the development";

- 4.33 This criterion is reflective of current operation policy under **PPS7 Quality Residential Developments** and its inclusion is supported. Such an approach will ensure that any proposals being brought forward are of a more sustainable nature and are also more robust in terms of delivering benefits to the local community in addition to just housing provision.
- 4.34 Our client's lands, if brought within the SDL for Parkgate, in addition to housing, are well placed, to also provide appropriate supporting community infrastructure and provide community benefits through provision of other facilities including associated open space, play ground, sports pitch and free public car park.

4.35 **Criterion (g)** proposes to require:

"A Design and Access Statement to accompany any housing development of 10 or more units".

4.36 Our client sees no issues in this being a policy requirement and would support its inclusion on the basis that it will assist in ensuring the development of high quality, attractive and sustainable places. We would however suggest that clarification is provided on the content of any Design and Access Statement and that the DPSD is clear on when such a document will be required. This is required to ensure that there are no contradictions or inconsistencies with current legislative directions on when Design and Access Statements are required.

4.37 **Policy DM 17.2** sets out that:

"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)".



4.38 **Policy DM17.2** is supported. *Creating Places – Achieving Quality in Residential Developments* is operational planning guidance and our client welcomes the consistency that will occur through the DPSD taking account of this document.

Section 8: Community Infrastructure (Pages 168) & Strategic Policy 5

4.39 Section 8 of the DPSD relates to community infrastructure and states at its **paragraph 8.1**:

"Good community infrastructure is essential for maintaining a high quality of life for the people of our Borough. Such infrastructure comprises a wide range of community facilities including hospitals, GP surgeries, schools, colleges, libraries, community centres, youth clubs, places of worship, halls and cemeteries as well as recreation and open space facilities such as leisure centres, playing pitches, sports grounds, parks and gardens, community allotments and children's play areas. Such facilities provide key services, act as focal points for the local communities they serve, and provide venues for community, cultural, educational, sporting and social interaction, whilst open spaces form an essential part of our Borough's 'green infrastructure'. Access to good community infrastructure also has an important role to play in improving health and wellbeing and fostering community cohesion and good relations".

[underlining emphasis]

4.40 **Paragraph 8.3** of the DPSD further states:

"The Council recognises that the provision of good quality community infrastructure to serve both existing and developing areas is a key element in the development of sustainable and healthy communities across our Borough".

4.41 Our client is supportive of this approach and welcomes the confirmation from Council of the need to provide good quality community infrastructure to benefit the communities of the Borough. In assisting this approach, the DPSD also provides a supporting strategic policy, *Strategic Policy 5: Community Infrastructure*. The DPSD sets out:

"The aim of this policy is to safeguard and enhance existing community services and facilities that serve the needs of our Borough's residents and to support the appropriate



provision of new or enhanced facilities. This aim has taken account of and is consistent with the provisions of the SPPS".

4.42 Strategic Policy, **SP 5.1** states:

"The Council, working with its statutory health and education partners and other stakeholders, including the community and voluntary sector, will seek to ensure that all communities in our Borough have access to health, education, community and recreational facilities as well as parks and other open spaces that meet the needs of the communities they serve".

- 4.43 Again, our client is supportive of *SP 5.1*, which echoes the overarching aim of the strategic policy for community facilities in that the Council will facilitate identification and safeguarding of sites for future community facilities to ensure the needs of the ANBC area are met. As set out, in tandem with utilising their lands for housing, our client is also willing to provide community facilities for the benefit of Parkgate and the wider area within their lands as shown at **Appendix 1**.
- 4.44 Our client is therefore supportive of **SP 5.1** and is of the opinion that it should be retained as part of any final Plan Strategy.

4.45 **SP 5.2** states:

"The Council will operate a presumption against the loss of existing community infrastructure, including open space of public value, to competing uses. Proposals for new community facilities and services will be supported and the Council will seek to ensure these are located in places that will promote accessibility and increased usage by the communities they are intended to serve".

- 4.46 Again, our client supports this policy, as it confirms Council will support proposals which are located in places that will promote accessibility and increased usage by the communities they are intended to serve.
- 4.47 Our client's lands are centrally located within Parkgate and are easily accessible to existing services and also capable of ensuring that they are connected in terms of walkability and will encourage social interaction as part of any development proposals. As identified, our client is willing to provide



community facilities in the form of open space, play ground, sports pitch and free public car park as part of any development of their lands for housing. The central location of the lands would mean that such facilities would be easily accessible by residents of Parkgate and the wider community.

4.48 **SP 5.4** states:

"The Council will also bring forward land allocations in the Local Policies Plan to address any deficiencies identified in open space provision, as well as to meet any needs identified by statutory health and education authorities for future facilities and development".

[underlining emphasis]

4.49 As stated in the preceding sections of this representation the Parkgate Community Group has consistently raised the lack of a play park, sports pitch and general amenity space within Parkgate village. It is our client's position that if their lands are brought within the SDL for Parkgate, they will be developed holistically and with the vision of creating a high-quality development which also provides relevant community infrastructure. There is therefore a need to address deficiencies in community facilities both within Parkgate and the Borough generally. **Policy SP 5.4** is therefore supported by our client given it will assist in addressing such deficiencies and in facilitating our client's vision for their lands.

4.50 **SP 5.5** states:

"The Council will also expect new development proposals to facilitate and improve linkages and accessibility to local community infrastructure and help maximise opportunities to promote healthy and active lifestyles. Major residential development proposals will be expected to support active travel options, encourage the reduction in use of the private car, provide adequate public open space, demonstrate high quality design and promote balanced communities and the creation of sustainable neighbourhoods".

[underlining emphasis]

4.51 This is further supported by **paragraph 8.10** for the DPSD which states:



"The Council recognises that many of our Borough's key community facilities are at the heart of local communities and therefore wishes to see new facilities located where they afford maximum access for those they are intended to serve".

- 4.52 The inclusion of our client's lands within the SDL for Parkgate and subsequent development for housing with associated open space, play ground, sports pitch and free public car park would result in the delivery of such uses in a sustainable central location at the heart of Parkgate. Such a location is easily accessible to existing services and facilities via means other than via private car. Furthermore, as has been stated, development of these lands which are centrally located, for the uses identified within Parkgate will also be capable of ensuring that they are connected in terms of walkability and thereby encourage social interaction.
- 4.53 Inclusion of our client's lands within the SDL for these purposes will allow connectivity to be provided between any future development and the rest of Parkgate Village, bringing the two parts (Eastern and Western ends) of Parkgate together.
- 4.54 As such, our client is supportive of **SP 5.5**.

Section 8: Community Facilities

Policy DM 24: Community Facilities (Page 176-179) Paragraphs 8.21 to 8.27

4.55 The DPSD identifies in relation to *Policy DM 24* that:

"The aim of this policy safeguard and enhance existing community services and facilities that serve the needs of our Borough's residents and to support the appropriate provision of new or enhanced facilities. This aim has taken account of and is consistent with the provisions of the SPPS".

4.56 The policy is further divided into sub-sections relating to **Development within Settlements** and **Development in the Countryside**. These state:



"Development within Settlements

DM 24.1 The Council will support proposals that provide new or enhanced community facilities and services. New facilities should be located within or adjacent to town, district or local centres or other locations that are easily accessible by public transport, walking and cycling.

DM 24.2 In exceptional circumstances, the Council will support siting a community facility at an accessible location on the edge of a settlement where the proposal:

- (a) Represents a logical extension to the built-up area;
- (b) Is of an appropriate scale in relation to the size of the settlement; and
- (c) Will not cause any significant adverse effect on the landscape setting or character of the settlement.

Development in the Countryside

DM 24.3 The Council will sympathetically view proposals for new community buildings and facilities, including outdoor recreational activities and play facilities at accessible locations in the countryside, where it is demonstrated these are necessary to serve the local rural population".

4.57 Our client supports the above policy provisions and the amplification behind them at **paragraph 8.25**, which states:

"New community facilities should be located in places that promote accessibility for the communities they are intended to serve. Whilst the majority of facilities will be located within or adjacent to our Borough's settlements, it is recognised that certain facilities may also be acceptable at accessible locations in the countryside where a demonstrable case of need can be made".

4.58 These policy provisions provide a level of flexibility in terms of the location of new community facilities both within settlements and within the countryside and are supported by our client.



- 4.59 At present our clients lands are outwith but directly adjacent to the existing settlement of Parkgate. As part of the Local Policies Plan it will be the intention to seek the SDL's amendment to include the lands in question for the reasons set out.
- 4.60 The inclusion of our client's lands within the SDL of Parkgate and their development for housing, with associated open space, play ground, sports pitch and free public car park, can be undertaken without any detrimental impact to the environment and will provide an entirely appropriate inclusion to, rounding off and consolidation of the SDL at Parkgate. Our client can assure Council that their land in Parkgate, if included within the SDL, will be developed for the uses identified and delivered well within the plan period.

Section 9: Placemaking and Good Design

Strategic Policy 6: Placemaking and Good Design

Policy DM 25 Urban Design (Pages 187-188)

- 4.61 The DPSD identifies that the aim of this policy is to promote high quality design which is responsive to the local character and distinctiveness of the urban places of the Borough and which is based on the principles of positive placemaking.
- 4.62 **Policy DM 25.1** requires that:

"The Council will require development within settlements to demonstrate a clear understanding of the characteristics of the site, its wider context and how the proposal will connect with the surrounding area".

- 4.63 The policy also requires that all development will be expected to deliver high quality design in its layout and appearance and demonstrates that it has considered a number of criteria which include: Placemaking and Good Design; Movement and Connectivity, Well Being and Safety, Landscape and Biodiversity, and Environmental Resilience.
- 4.64 Our client agrees that developments whether in the settlements or in the countryside are required to demonstrate a design led approach. Such an approach has been taken on previous schemes within Parkgate by our client such as the proposal for full planning permission for 13No. dwellings granted



- under **LA03/2016/1081/F.** A design led approach will be utilised to deliver a sense of place within our client's lands should they be brought within the SDL of Parkgate for housing.
- 4.65 The location of the lands centrally within Parkgate will allow connectivity to be provided between any future development and the rest of the village, bringing the two parts (Eastern and Western ends) of Parkgate together whilst assisting in creating a sense of place.



If you consider the draft Plan Strategy to be 'UNSOUND' please identify which test(s) of soundness your representation relates to having regard to the Department for Infrastruture's published Development Plan Practice Note 6 'Soundness' (Version 2).

- 4.66 Whilst our client broadly supports the DPSD, it is considered to be Unsound in a number of respects due to failing the following Soundness Tests:
 - **C3 (Consistency) -** Did the Council take account of policy and guidance issued by the Department?
 - **CE2 (Coherence & Effectiveness) -** Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?
 - **CE4 (Coherence & Effectiveness) -** It is reasonably flexible to enable it to deal with changing circumstances.

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

4.67 Our client considers that the DPSD is Unsound in a number of areas which we comment on below.

Strategic Policy 4: Homes Housing Growth and Allocation (Page 134-135, 137-138)

- 4.68 Whilst housing growth figures and allocation are supported in broad terms as set out at **paragraphs**4.22 to 4.26 above, it is the distribution of the allocation amongst the villages which it is not considered to be sound and needs to be reviewed and revisited. Indeed, there is a question over why Parkgate has such a low allocation when compared to other Villages which are comparable to it in terms of facilities, location, connectivity to key transport corridors etc.
- 4.69 In light of the above, the Housing Growth and Allocation of the DPSD is unsound on the basis that it fails to meet tests **CE2** and **CE4** (**Coherence and Effectiveness**). We expand below.



- 4.70 It is noted that the POP previously identified that the villages of Ballynure, Templepatrick and Toome were able to accommodate a higher rate of growth than other villages because they are better located in terms of connection to the key transport corridors as defined in the RDS. Within the DPSD these villages have subsequently being given higher growth allocations than Parkgate (allocation of 60, 100, 55 respectively in comparison to the 10 allocated to Parkgate).
- 4.71 Whilst Parkgate is not identified as one of the higher growth Villages, it is equally well placed, if not more so than other Villages, within the Antrim and Newtownabbey area in respect of connectivity and its location. Its sustainable position within the ANBC area (given its excellent connectivity to the M2 motorway to the South West of the village and good connectivity with Doagh, Ballyclare and Ballynure to the West along with provision community facilities, shops and services) therefore means that it should be identified with a higher growth allocation as part of the LDP.
- 4.72 Indeed, it is noted in *Evidence Paper 6 Housing* at paragraph 10.6 that the allocation to Villages is "...in line with their role and function". It goes further to confirm at paragraph 10.13 that "Each of the villages receives some housing growth in line with their size and function...".
- 4.73 Parkgate is itself well provided for in terms of services with a number of shops, church and primary school, all located within the Village. It is also well located within the ANBC area with excellent connectivity to the M2 motorway to the South West of the village and good connectivity with Doagh, Ballyclare and Ballynure to the West.
- 4.74 Indeed Council's *Evidence Paper 2 Settlement Evaluation* (pages 89-91) for Parkgate confirms the various services and facilities which the settlement benefits from along with its locational strengths (pages 89-91 of. It also identifies that there are only a small number of potential development sites within the existing SDL and this further reinforces that additional land requires to be identified.
- 4.75 In order to assist in this, a greater and more equitable distribution of the identified Housing Growth Allocation for the villages within ANBC should therefore be provided for Parkgate. This is due to it being equally well placed, if not more so than other Villages, within the ANBC area in respect of connectivity and its location compared with other Villages and given it boasts comparable if not greater services and facilities than other identified villages.



- 4.76 Our client's lands at **Appendix 1** are available to be brought into the SDL for Parkgate to facilitate any increased allocation for housing. By doing so, this will assist in meeting and delivering proposed Spatial Growth Strategy, (d) in terms of sustaining and maintaining the role of villages as centres providing opportunities for housing and employment.
- 4.77 As confirmed previously our client's land at Parkgate is excellently placed to assist in providing for future housing and associated community facilities to maintain and consolidate Parkgate's role as a Village and assist in meeting and delivering the Plan Vision and Objectives. It can support and facilitate both the identified and any increased housing allocation for Parkgate, existing deficiencies in community facilities and also logically round off its SDL.

Modifications

- 4.78 Modifications should be made to Housing Growth and Allocation in terms of the distribution of allocation to the identified villages.
- 4.79 The identified villages should be reviewed and a greater and more equitable distribution of the identified Housing Growth Allocation for the villages within ANBC should therefore be provided for Parkgate. This is due to it being equally well placed, if not more so than other Villages, within the ANBC area in respect of connectivity and its location compared with other Villages; and, given Parkgate boasts comparable if not greater services and facilities than other identified villages.
- 4.80 In addition, should greater allocation be identified for Parkgate then additional land must be brought forward to allow for flexibility, if the additional required units cannot be delivered within the SDL, be it through ownership constraints or other land restrictions. Indeed, it has already been identified in Council's *Evidence Paper 2 Settlement Evaluation* which indicates that there are only a small number of potential development sites within the existing SDL thereby further reinforcing that additional land requires to be identified.
- 4.81 Similarly, should it be the case that the identified allocation (10No. dwellings) is not delivered or cannot be delivered within a timely period, then an expansion of the SDL to allow for additional lands to be brought forward would be of benefit and guard against such a scenario occurring. This would ensure that there is flexibility to allow the identified housing need to be met during the plan period.



- 4.82 Our client's lands are best placed to facilitate this acknowledged housing need in Parkgate. The lands would provide an appropriate inclusion to, rounding off and consolidation of the SDL at Parkgate and are best placed to facilitate delivery of the Growth Allocation should it not be able to be met within existing SDL. The inclusion of additional lands within other nearby Villages such as Templepatrick, Dunadry or Ballyrobert would result in elongation of that settlement whereas inclusion of our client's lands within Parkgate will provide a more sustainable consolidation of the settlement and help to reinforce and strengthen its position.
- 4.83 A greater Housing Growth Allocation should be provided to Parkgate as a result of its characteristics and role in relation to other villages. In providing such modifications it would provide greater coherence and effectiveness to this part of the DPSD bringing it in line with soundness tests CE2 and CE4 (Coherence and Effectiveness) whilst better assisting in meeting the needs of the ANBC 2030 LDP moving forward.

Strategic Policy 4: Homes

Policy DM17.3 & DM17.4: Affordable Housing (Paragraphs 7.30 - 7.42, Pages 142 - 147)

4.84 **Policy DM 17.3** sets out Council's strategic policy for affordable housing and states:

"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".

4.85 **Policy DM 17.4** goes on to state that:

"The affordable housing element of the proposed development should be distributed throughout the general housing layout and not be easily distinguishable by means of its general design, materials or finishes from the general housing element".

4.86 It is the position of our client that these Policies in relation to affordable housing fail to satisfy the tests of **C3 (Consistency)** and **CE4 (Coherence and Effectiveness)** in that they are not consistent with, nor does they incorporate, an appropriate degree of flexibility in line with the Strategic Planning Policy Statement ('SPPS') and Regional Development Strategy ('RDS').



4.87 The SPPS which states at its **paragraph 6.143** that:

"The HNA/HMA undertaken by the Northern Ireland Housing Executive, or the relevant housing authority, will identify the range of specific housing needs, including social/affordable housing requirements. The development plan process will be the primary vehicle to facilitate any identified need by zoning land or by indicating, through key site requirements, where a proportion of a site may be required for social/affordable housing. This will not preclude other sites coming forward through the development management process".

4.88 The SPPS clearly indicates that affordable housing is a matter to be addressed through: "...zoning land or by indicating, through key site requirements, where a proportion of a site may be required for social/affordable housing". The zoning of land and key site requirements are all matters for the Local Policies Plan and not the Plan Strategy Document.

Modifications

- 4.89 **Policies DM17.3** and **DM17.4** should be removed from the DPSD and dealt with at the Local Policies Plan stage which will deal with the zoning of land and key site requirements, methods through which the SPPS identifies for identifying affordable housing.
- 4.90 Alternatively, if the above policies are to be kept within the DPSD they should only be as an interim measure until such times that the Local Policies Plan brings forward sites with Key Site Requirements addressing affordable housing needs. Similarly, if retained as an interim measure, such policies should only apply where a need for social housing has been identified by the relevant strategic housing authority.
- 4.91 In making such an amendment it would provide greater consistency and coherence to the DPSD and bring it in line with soundness tests **C3 (Consistency)** and **CE4 (Coherence and Effectiveness)**.



If you are seeking a change to the draft Plan Strategy, please indicate how you would like your representation to be dealt with at Independent Examination:

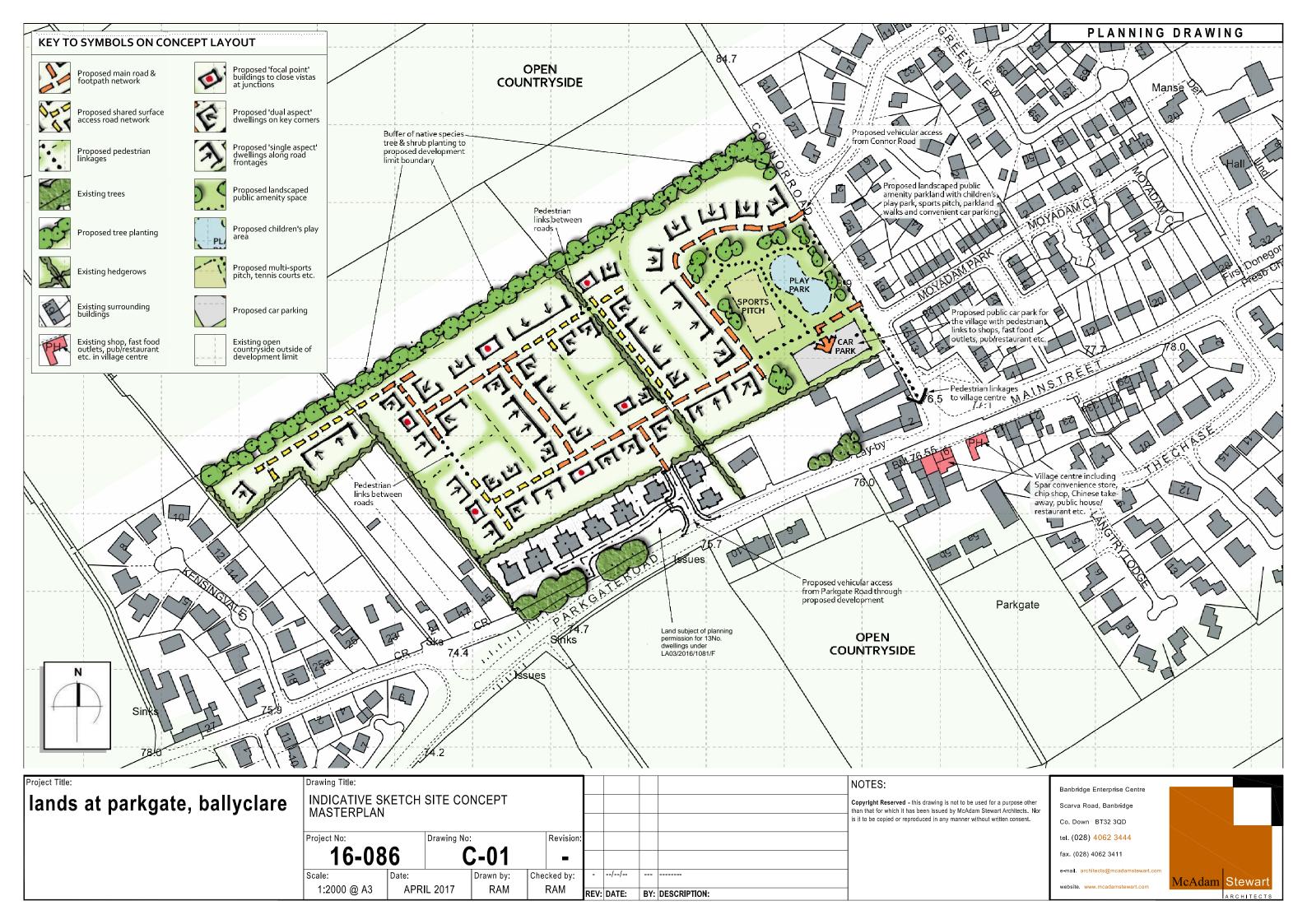
4.92 In accordance with **Section 10(7)** of **The Planning Act (Northern Ireland) 2011**, should ANBC submit the DPSD in its current form to the Department for an independent examination, we request that we are given the opportunity on behalf of our client to appear before and be heard at the examination by way of an **Oral Hearing**.

Signature:		
Date:	20 th September 2019	



Appendix 1

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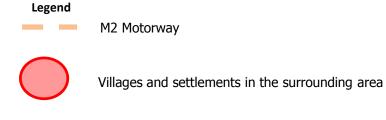




Appendix 2

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Lands at Parkgate, Antrim

Site Context Plan