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Town & Country Planning Consultants

DEVELOPMENT PLAN TEAM
Antrim and Newtownabbey Borough Council
Planning Section
Mossley Mill
Carnmoney Road North
Newtownabbey
BT36 5QA

20th September 2019

OUR REF: G/044/19

Dear Sir/Madam,

Re: Representation for Mr P Madden, for Lands at Shore Road, Toomebridge.

It is recognised that the Draft Plan Strategy - Local Development Plan 2030 (dPS) consultation process deals with the spatial and regional policies to be applied to the borough when the new Local Development Plan is adopted. The following and appended map identify land that should be considered for the next stage of the plan process as this will enable implementation of the proposed strategic policies formulated for the dPS.

The northern and eastern boundaries of the land highlighted in red on the appended map (Map 1) immediately abut the current settlement limits for Toome comprises flat agricultural land with intervening vegetation and reads development and amenity facilities located to the north west and north travelling towards the village along the Shore Road.

It is contended that Strategic Policy 1: Sustainable Development, Spatial Growth Strategy and the Places of our Borough is generally 'Sound' and the hierarchy applied to the various settlements. However, Toome should also be recognised as a rural gateway with direct links to the cities of Derry and Belfast and provides an ideal location of settlement along the A6 commuter belt.

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None of the other villages for the borough would have the same direct access or unique attributes that this village possesses. The locality would prove a very attractive location for people to settle and integrate with the community and possibly the allocation of 55 new units as per Table 6: Allocation of Housing Growth 2015 to 2030 may be somewhat restrictive. It is acknowledged that paragraph 7.7 of the dPS suggests flexibility on the amount of overall new housing that should be permitted during the plan period, however there should be some reference made to Toome specifically given its central location and direct access to the main trunk road connecting the two cities and surrounding towns. This would still be in general conformity with the Strategic Framework Guidance's SFG 13 and SFG 14 of the Regional Development Strategy (2035) listed in Table 2 of the dPS.

Nevertheless, to accord with the housing allocation currently identified, the appended map with land outlined in red would go somewhat to meeting this provision. Due to the creation of major infrastructure routes, i.e. the A6, and more up-to-date surveying for flooding, Toome is very restrictive in terms of growth and land provision. A lot of the land within the current settlements especially land to the mid northern section of the village, i.e. land wedged between Rogurey Road and the A6 is now within the flood plain as per the Strategic Flood Map NI.

Flooding exists extensively on land to the west of Toome and thus it would prove non-feasible to extend the limits in that direction or to the east due to the A6 road and disturbance caused from this thoroughfare. There are protected natural heritage sites around Lough Neagh and the River Bann including riparian habitats and shores. These areas should be protected and appropriate buffers applied in affiliation with Strategic Policy 8 — Natural Heritage of the dPS. Thus the most plausible option would be to explore land to the south to enable sustainability of the village and future growth throughout the lifetime of the new plan.

Many of the other lands within the current settlement limits and not susceptible to flooding, have been developed or are currently under development demonstrating the vitality of the settlement and need for housing.

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The foregoing and accompanying map illustrates that the land would address the soundness test for, but is not limited to, the following strategic policies:

Strategic Policy 1: Sustainable Development;

Strategic Policy 4: Homes;

Strategic Policy 8: Natural Heritage;

Strategic Policy 10: Environmental Resilience & Protection.

It is trusted that this submission will be considered accordingly and that the landowner will have the opportunity to make further representation at the appropriate times in the plan process.

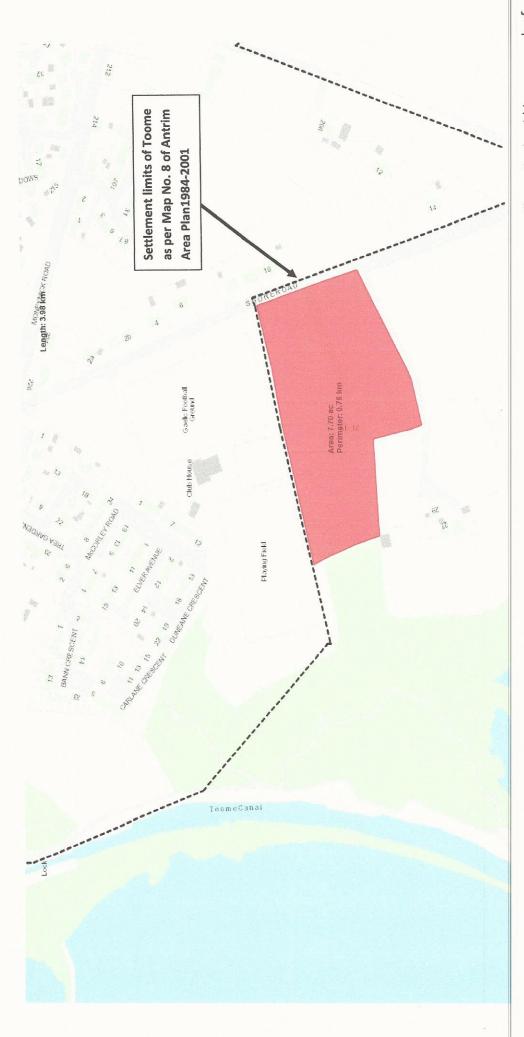
Yours faithfully,

THERESA CASSIDY

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Map 1 - Site outlined and highlighted in red. Northern and eastern boundaries immediately abut the settlement limits for Toome village. Site is within easy reach of surrounding amenities and facilities. (Map not to scale)

Source: Spatial NI