

LA03/DPS/0104

**Forward Planning Team**

Antrim and Newtownabbey Borough Council  
Planning Section  
Mossley Mill  
Newtownabbey  
BT36 5QA

Dear Sir/ Madam,

Date: 19<sup>th</sup> September 2019**Re: Mr Gawn Graham Response to Antrim Newtownabbey Council Local Development Plan 2030- Draft Plan Strategy**Your Ref: -  
Our ref: 2019524

We write on behalf of our client, Mr Gawn Graham to make a submission in respect of the Antrim Newtownabbey Borough Council ("ANBC") Local Development Plan ("LDC") Draft Plan Strategy ("DPS").

The submission considers the policies within the DPS, relevant to our client, having regard to the necessary soundness tests referenced in the Council's document 'Guidance Notes on the Tests of Soundness and Submitting a Representation' and Development Plan Advice Note 6. Our client has a particular interest in the Spatial Growth Strategy and Housing Allocation, specifically in respect of the allocation for the village of Burnside. In addition to this we draw your attention to specific lands at Corgy Road, Burnside, which we have identified as being suitable for inclusion within the settlement development limit of the Burnside.

Our client welcomes the Plan Vision and agrees that the LDP should result in the Borough being an "excellent, attractive and diverse place in which to live and work" and agrees that "development should be sustainable". Our client is therefore particularly supportive of the following Strategic Objectives;

- *Strategic Objective 1- 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 7- Promote positive place making and ensure that high quality new development respects, enhances and integrates with our historic environment and natural heritage.*
- *Strategic Objective 8 - Ensure a sufficient supply of land for new homes, provide a diverse choice of housing and strengthen community cohesion.*

In general the DPS Spatial Growth Strategy appears to be soundly based to focus growth in the main hubs, towns, however our client is concerned about the proportion of housing allocated to the countryside and the impact this has on the village allocation. We draw attention to Paragraph 4.7 (page 70 of DPS) which refers to the growth being focused in the Metropolitan Newtownabbey and Antrim, large town of Ballyclare and the smaller towns, how it makes no reference to the villages. Rather it ignores village growth and instead comments on allowing "growth in our smaller settlements and the countryside". There is a clear absence of reference to village

growth and appears to favour countryside provision over focused growth in villages to service the countryside.

Therefore in light of this Mr Graham has concerns as to whether the Housing Allocation distribution does fully reflect the Regional Development Strategy and suitably focuses growth in the urban centres, owing to the relatively high proportion of the allocation being distributed in the countryside. On this basis our client reluctantly objects to the following policies and submits they do not meet the tests for soundness:

#### **Strategic Policy 4 Homes**

Strategic Policy 4 is intended to deliver the LDP objectives, including Strategic Policy 1 'sustainable growth' and is therefore integral to the implementation of the Spatial Growth Strategy. Notably paragraph 4.5 of SP 1 acknowledges the need to focus population growth close to key service centres to ensure proportionate sustainable growth;

*settlements provide, or have the capacity to provide for the critical mass needed to serve as centres for key growth, whilst smaller settlements and the countryside are appropriate for more limited, proportionate sustainable growth.*

Mr Graham is concerned that the Allocation, as set out in Table 6, will enable a greater growth in the countryside at the detriment to the sustainability of local villages. The Countryside Allocation of 750 units is significant, accounting for almost 8% of the total growth and is disproportionate to the population demographic. Sequentially, after the Metropolitan Newtownabbey area and towns, the villages ought to be allocated to provide the main growth to service the surrounding rural hinterland and accommodate the main rural population growth. This is promoted in the RDS and therefore ought to be reflected in the DPS.

The allocation of almost 8% growth across the countryside, compared to less than 1% in each village is disproportionate and fails to properly take account of the role of villages as being service centres for the rural population. This allocation will create tensions in delivering 'sustainable development' and will weaken the role of villages in the rural area. Furthermore this allocation will compromise the delivery of the Spatial Growth Strategy;

*Spatial Growth Strategy*

*(a) Focus core growth in Metropolitan Newtownabbey and the Major Hub Town of Antrim,*

*(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.*

The strategic objective (d) and maintenance of the 'village' is arguably compromised through objective (e); by allowing disproportionate growth in the smaller settlements /countryside will undermine the role of the village and weaken the focused growth strategy in urban areas. Rural population growth ought to be focused in the villages (after towns).

As conferred by the Regional Development Strategy 2035 (RDS), the role of the LDP is to "identify and consolidate the role and function of settlements within the cluster". The housing allocation therefore is integral to ensure that sufficient land is included within the Settlement Development Limits to maintain the function of villages as the main service centres for the surrounding rural hinterland.

Specifically Mr Graham argues that the allocation for **Burnside** ought to be increased to reflect its role:

- It benefits from a central location serving a wide surrounding rural hinterland
- It has a local pre-school and Primary School, with capacity to accommodate future generations
- It has a range of services; shop, public house, post box and hair/ beauty salon
- It has a range of community uses; Community/ Orange Hall, Play Park and Community Group.
- Historically was an industrial growth centre
- It has a strong amenity value, benefiting from a local river walkway and equipped play area.

The following comments are made in respect to Soundness Test:

➤ **Soundness:**

Object on the basis that this policy fails to meet Test C1 & C3 in that SP 4 does not take account of policy and guidance issued by the department in the RDS to sequentially focus growth in main towns and then villages.

Object on the basis that this policy fails to meet Test CE2 & CE4 in that the allocation is disproportionate to the Strategic Growth Plan and population demographics. The village allocations are not realistic or appropriate and have not considered the relevant alternatives. The limited allocation for the villages is insufficiently flexible to meet future growth needs to deal with changing circumstances.

➤ **Remedy**

The Plan needs to be updated to increase the Allocation within the Villages, specifically Burnside, to focus growth to service the surrounding rural area (rather than dilute settlement hierarchy through disproportionate high level of growth in small settlement & countryside).

The settlement limits should include a modest rounding off to include sufficient lands to accommodating housing and associated development during the plan period.

### **Proposed Site for Inclusion in Settlement Limit of Burnside**

The lands delineated in Figure 1 below are located at Corgy Road, Burnside on the south eastern side of the village. The site comprises undeveloped land, located within the existing countryside but not subject to any protective or restrictive designations.



**Figure 1 Overview of Lands available for development**

The site provides a potential rounding off opportunity for Burnside and are particularly well suited to accommodate the future growth of this settlement in that;

- The lands immediately adjoin existing housing and would offer a logical expansion and rounding off to the settlement;
- The site comprises gently sloping topography and would be well suited to providing housing;
- The site is not affected by flood plain or any other environmental restrictions;
- The site would offer an opportunity to create a more sensitive edge of settlement buffer, with the potential to create a landscaped buffer along the eastern edge of the site to integrate the new and existing built form; thereby improving views on approach from the east along Corgy Road;
- There is potential for access off the Corgy Road as Mr Graham owns land outlined in blue in Figure 1 and has sufficient land ownership to provide adequate sightlines;
- The lands ties into the existing river corridor and would offer an opportunity to extend the walkway and create a village loop. The eastern half of the site could be development in junction with housing to provide a new park and walkway that links to the footpath along Corgy Road, thereby providing a walking route around the village.
- This site presents a tangible opportunity to connect the southern half of the settlement with the existing open space provisions.

We respectfully request our clients land is included within the Settlement Limit for Burnside. This offers a tangible opportunity to meet the future housing needs, while also providing a unique opportunity to enhance the recreational and amenity value of the village. As above this site would offer a considerable area of land to create a new park and to extend the existing river walk to link around the southern edge of the settlement, past the historic mill buildings. This is consistent with the direction at paragraph 7.28 of DM17 in that housing on these lands would be accessible to recreational space and public transport.

Paragraph 7.27, in respect of Policy DM 17 the LDP seeks to facilitate an “adequate and available choice of housing within settlements” and therefore it is critical that settlement limits provide sufficient land will be released for development and not land banked. While it is acknowledged there remains 2 areas of previously zoned housing

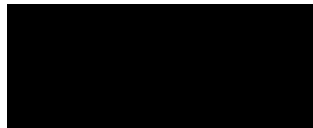
land remaining undeveloped, it is noteworthy that these lands were not brought forward for development over the last plan period since pre-2005 and therefore there is no assurance they will be released for development by 2030.

Mr Graham is committed to delivering development on this land and would ask the Council to consider the benefit of developing the lands Figure 1 for housing with enhanced parkland open space.

Mr Graham would welcome the opportunity to remain involved in this process.

We trust this will be given due consideration, but should you require any further information please do not hesitate to contact this office.

Yours sincerely,



**Gemma Jobling BSc Dip TP MTRPI**  
**Director**  
Jobling Planning + Environment Limited