

**GRAVIS**  
PLANNING

BELFAST | DUBLIN

**BY EMAIL & POST**18<sup>th</sup> September 2019

Our Ref: C04233

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) on behalf of Ulster University**

This letter is submitted on behalf of our client, Ulster University, 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, we would urge the Council to be mindful of the University's plans to redevelop the campus as they progress the LDP. Redeveloping the site under a residential-led masterplan has the potential 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?*

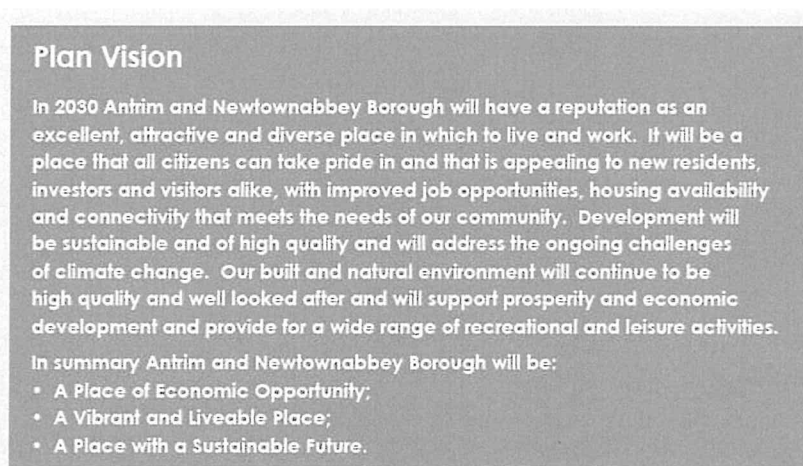
Consistency Tests

- 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 (a) which aims to focus core growth in Metropolitan Newtownabbey and the Major Hub Town of Antrim, based upon existing committed development allocations and strengthen their role as the primary locations for future housing and economic growth and investment within the borough.

### 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 the overall housing figure should be updated to reflect our suggested revised housing growth figure of 11,220 (14,960 inclusive of five-year land supply) as per Option 3 within the Preferred Options Paper (POP). We also note that the below percentage of growth is not necessarily reflective of any of the growth rated within the options shown within the POP that wasn't included in the POP.

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
<b>TOTAL</b>	<b>9750</b>	<b>100</b>

Table 6: Allocation of Housing Growth 2015 to 2030

We consider that Option 3 in the POP, 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 aim in section 8.1.7 in Belfast City Council's draft Plan Strategy 2035).

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 Option 3 within the Preferred Options Paper below:

Location	Growth Allocation	Existing Housing Supply	Balance of Allocation and Supply	Existing Number of dwellings	Growth Rate
Metropolitan Newtownabbey	5,060	4434	-626	27371	19%

The redevelopment of the Jordanstown campus site through a residential-led redevelopment scheme could help contribute to housing growth within Newtownabbey in the delivery of new homes.

#### 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).

#### Remedy

- Revise PSO 4 to update the housing growth figure to provide 11,220 new homes within the district by 2030 as the projected housing growth of 9,750 underestimates housing need.



## 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 should be introduced once the proposals meet or exceed the ‘major residential development’ threshold (i.e. comprising 50 residential units or more or on sites of 2ha. 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 providing affordable housing only where there is an established need for such housing as established by a Housing Needs Assessment undertaken by the Northern Ireland Housing Executive. Where the Housing Needs Assessment establishes there is a need in an identified settlement or within a locality, affordable housing should be provided.

#### 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 a minimum of 10% of the total units proposed are provided as affordable homes for ‘major’ residential development schemes and where there is an identified level of need, in agreement with NIHE.

### **Natural Heritage**

Strategic Policy 8 relates to natural heritage which includes Local Landscape Policy Area’s. SP 8.7 mentions that natural heritage comprises those features and areas within and adjoining the settlements of our Borough considered to be of greatest amenity value, landscape quality or local significance and therefore worthy of protection from undesirable or damaging development. SP 8.8 states that the Council will identify the location and precise boundaries of Local Landscape Policy Areas within and adjoining settlements in the Local Policies Plan.

The extant area plan includes a Local Landscape Policy Area (LLPA – designation MNY46) that extends across the full of the Jordanstown campus site. We would urge the Council to consider redrawing this LLPA designation (if they plan to retain such a designation on site) on the foot of comments made by the Commissioner when determining the planning appeal in relation to the previous masterplan application. We would refer the Council to paragraph 15 of the Commissioner’s decision (ref. 2015/A0140), specifically:

*“... many of the grassed and landscaped areas around the University buildings are intrinsically linked to the current use and that once the majority of buildings are removed the function and value of those areas as a local amenity asset is likely to be reduced.”*

Based on the above, we would request that the Council consider redrawing the extent of the LLPA to cover only the stream corridors that run through the campus, rather than applying the designation to the entire campus lands. Other listed features of the LLPA, as set out in BMAP, are protected through regional planning policy (such as the archaeological sites and listed building – protected by PPS6 and the playing pitches – protected by PPS8). Any revised masterplan proposal will take cognisance of these features and planning policy requirements and therefore are less likely to require additional protection through an LLPA designation in the new Local Policies Plan.

#### Soundness Test

- Strategic Policy 8 is not sound under which the success of the plan is being assessed and is not based on robust evidence (Test CE2).

#### Remedy

- Consider redrawing this LLPA designation (if they plan to retain such a designation on the Jordanstown campus site) on the foot of comments made by the Commissioner when determining the planning appeal in relation to the previous masterplan application.

### **Open Space**

Policy DM23 relates to the protection of open space and the Council will operate a presumption against development that would result in the loss of, or have a significant adverse impact on, an area of open space irrespective of ownership, physical condition or appearance.

Paragraph DM 23.2 states that an exception will be permitted in the following circumstances where it is demonstrated the loss of the open space will have no significant detrimental impact on the amenity, character or biodiversity of an area; (a) The proposed development would bring significant community benefits that clearly outweigh the loss of the open space; or (b) The proposed development is ancillary to the principle use and will enhance use of the site for sport and recreation.

Consideration may also be given to the development of an area of open space (2 hectares or less) where an acceptable replacement space can be provided and/or paid for by the applicant in an equally convenient and accessible location within the locality and provided the loss of the existing open space will have no significant detrimental impact. DM 23.4 states that for the purposes of this policy, open space is defined as all open space of public value.

We consider that each case should be considered on its merits on a site by site basis. The same arguments made relating to the LLPA designations apply here, in that many of the grassed and landscaped areas around the University buildings are intrinsically linked to the current use and that



once the majority of buildings are removed the function and value of those areas as a local amenity asset is likely to be reduced. Therefore, designation and policy protection should not be given to these associated open space areas, as it could hinder the redevelopment of the masterplan area.

#### Soundness Test

- Policy DM23 is not sound under which the success of the plan is being assessed and is not based on robust evidence (Test CE2).

#### Remedy

- The council should not retain or extend open space zonings on the Jordanstown campus site, based on the comments made by the Commissioner when determining the planning appeal in relation to the previous masterplan application.

### **Neighbourhood Centres**

It should be acknowledged that any future masterplan for the Jordanstown campus is likely to include some form of 'neighbourhood centre' provision; given the scale of the site, the potential number of residential units that could be developed on site and the need of future residents to have access to neighbourhood retailing and other services.

We note that the Council's preferred option 2 within their POP in relation to neighbourhood centres states that the Council should *"Retain the existing Neighbourhood Centres and identify new ones drawn from the Top 2 tiers of our settlement hierarchy."*

However, this has not been discussed within the draft Plan Strategy. Policy DM17 is the only policy that discusses neighbourhoods; in ensuring that adequate provision is made for necessary local neighbourhood facilities, to be provided by the developer as an integral part of the development.

We are supportive of this policy. However, we would also urge the Council to consider adding a new 'neighbourhood centre' for the Jordanstown area on the campus site within the Local Policies Plan.

The Jordanstown area currently lacks any local retailing or servicing provision, with the nearest neighbourhood centres being Monkstown (proposed centre c.2km from the Jordanstown campus) and Whiteabbey Village (proposed centre c.1.2km from the Jordanstown campus). Considering the existing population levels of the Jordanstown area, the potential increase of residents as a result of the redevelopment of the campus site and the excessive travel distances to the nearest proposed 'neighbourhood centres'; there are sound grounds to designate a new Jordanstown 'neighbourhood centre' within the University campus grounds.

### **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.

Although, we broadly support the monitoring indicators, we believe the 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.

### **Future of Jordanstown Campus**

The Local Policies Plan aims to 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 the Borough in a sustainable manner. It will also bring forward a range of local designations that will help steer overall growth and development.

As the Council will be aware, the University will be moving the majority of their functions from the Jordanstown campus into the new Greater Belfast Development site on York Street.

Outline planning permission was sought for the redevelopment of the majority of the campus site in 2012 and was ultimately refused at appeal last year. However, the principle of redeveloping the University campus under a residential-led masterplan was accepted by both the Council and the Planning Appeals Commission. The University are currently in the process of reconsidering this masterplan with a view to commencing a new planning process for a revised masterplan proposal in the near future.

On this basis, we would urge the Council to be mindful of the University's plans to redevelop the campus and the fact that the principle of redeveloping the site under a residential-led masterplan was accepted by all parties as they progress the LDP. In particular, we would draw the Council's attention to our suggested changes on the above policies, as they relate to the Jordanstown campus site.

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**