

From: [Planning Section](#)
To: [Forward Planning Team](#)
Subject: FW: HISTORIC ENVIRONMENT DIVISION RESPONSE TO ANBC - draft Plan Strategy & draft Sustainability Appraisal Questionnaire
Date: 18 September 2019 15:08:18
Attachments: [HED Response Antrim & Newtownabbey - dPS - draft SA SEA questionnaire.pdf](#)
[Historic Environment Division response on Antrim & Newtownabbey - dPS - draft Plan Strategy questionnaire.pdf](#)

[Planning Section](#) | | [Ext:](#)

From: [REDACTED]
Sent: 18 September 2019 14:57
To: Planning Section <planning@antrimandnewtownabbey.gov.uk>
Cc: [REDACTED] Sharon Mossman
 <Sharon.Mossman@antrimandnewtownabbey.gov.uk>; [REDACTED]
 <[REDACTED]>
Subject: HISTORIC ENVIRONMENT DIVISION RESPONSE TO ANBC - draft Plan Strategy & draft Sustainability Appraisal Questionnaire

Dear Sir/Madam,

DfC HISTORIC ENVIRONMENT DIVISION RESPONSE to draft PLAN STRATEGY and draft SUSTAINABILITY APPRAISAL (INCORPORATING the SEA) REPORT

Please find attached the Historic Environment Division responses to both the draft Plan Strategy and draft Sustainability Appraisal incorporating the SEA released for public consultation. We have attached PDF versions of the online questionnaires.

At the outset of our response HED would like to commend ANBC for their demonstration of usage of the historic environment evidence in informing the production of their development plan strategy. While we have articulated some responses around soundness of certain policies within the plan, HED advise that on the whole we can see, through the published draft plan strategy documentation, how the historic environment evidence bases have been utilised and taken into account in informing the plan, and in particular, the settlement evaluation.

Where HED consider the draft Plan Strategy (dPS) to be unsound having regard to the tests of soundness, we have stated same and we have articulated comments and provided suggested corrections we consider necessary to make the dPS sound. Our responses relates primarily to impact of the dPS on the Historic Environment (section 10). However, where we have had the opportunity we have also framed some responses around other policies as we deem appropriate to impacting the historic environment. Our not having provided comment on other sections of the dPS document should not be considered as an endorsement of proposals as we would expect other consultees to provide detailed comment as relates to their areas of expertise.

In addition, HED has provided comments in relation to some of the evidence papers to aid the council in making them more robust and to help in further consideration of the historic

environment evidence bases in relation to zoning at Local Plan Policies stage.

We look forward to continuing to work with you through the LDP process and should you wish to discuss any of our comments within the questionnaire attached please contact us at the address below.

In relation to our response documents, we would request that email contact details, personal names and phone numbers be redacted when our response is published online. We would be grateful for an acknowledgement of receipt for this email.

Yours Sincerely,

[Redacted Signature]

[Redacted Name]

Senior Inspector of Historic Monuments | Heritage Records and Designations Branch

Historic Environment Division | Department for Communities

Klondyke Building | Cromac Avenue | Gasworks Business Park | Malone Lower | BELFAST | BT7 2JA

Contact: [Redacted Phone Number]

Consultation Period

Antrim and Newtownabbey Borough Council has published its draft Plan Strategy, the first formal stage of the new Local Development Plan 2030, for public consultation.

The draft Plan Strategy is the first of two documents, which comprise the Local Development Plan 2030. It has been developed following extensive engagement with the public, stakeholders and our elected Members and has included the publication of our Preferred Options Paper.

The draft Plan Strategy sets out how our Borough will grow and change up to the year 2030. It puts forward our Plan Vision for the future. It also contains a Spatial Growth Strategy indicating at a strategic level where growth should go in the Borough. It also sets out a range of Strategic Policies and Detailed Management Policies, which together will guide future planning decisions.

The draft Plan Strategy is published for formal public consultation over an 8-week period and the Council is inviting the submission of representations, beginning on **Friday 26 July 2019 and closing on Friday 20 September 2019 at 5pm.**

Please note that representations received after the closing period will not be accepted and will be subsequently returned.

The submission of representations in relation to the Council's draft Plan Strategy provides an opportunity for the public to influence the policies and proposals for the future planning and development within Antrim and Newtownabbey.

Copies of the draft Plan Strategy and all supporting documents are available to view and download from our website at:

www.antrimandnewtownabbey.gov.uk/draftplanstrategy.

Copies of all documents are also available for inspection at the Council Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8.30am to 5pm. Hard copies of the draft Plan Strategy are also available upon request.

Commenting on the Sustainability Appraisal incorporating Strategic Environmental Assessment

This Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) is published alongside the draft Plan Strategy for formal public consultation over an 8-week period and the Council is inviting expressions of opinions, beginning on **Friday 26 July and closing on Friday 20 September 2019 at 5pm.**



The SA is published alongside a non-technical summary and scoping report.

SA is a statutory process incorporating the requirements of the European Union Strategic Environmental Assessment Directive (2001) ('the SEA Directive'). It provides the process for assessing potential effects of proposed plans or programmes, to ensure that potential significant environmental impacts are considered from the earliest opportunity and addressed in decision-making.

SEA is a systematic process for assessing potential effects of proposed plans or programmes to ensure that significant environmental impacts are considered from the earliest opportunity and addressed in decision making. It was introduced by the European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (known as 'the SEA Directive'). In Northern Ireland, the Directive's requirements are taken forward through The Environmental Assessment of Plans and Programmes (EAPP) Regulations (Northern Ireland) 2004. The EAPP (NI) Regulations set out more detailed requirements for the process and content of the environmental assessment of plans and development.

The SA process assesses plans against a set of sustainability objectives and aims to ensure that the policies and proposals in the Local Development Plan are socially, economically and environmentally sustainable.

The first stage of the SA process is the SA Scoping Report. The SA Scoping Report presents information about the topics being assessed under the SA, which incorporates the SEA. The SA Scoping Report then establishes and describes the sustainability framework against which the Plan is assessed and sets out the proposed approach to the appraisal of the Local Development Plan. The Scoping Report will be updated throughout the Plan preparation and will be included with all SA Reports published as part of the consultation process for the Local Development Plan. A SA Interim Report together with the SA Scoping Report was published for consultation at the same time as the Preferred Options Paper (POP) in 2017.

The Council welcomes your opinions on any aspects of the SA incorporating SEA, and in particular, if any of the predicted effects are likely, or if there are any significant effects which have not been considered, or if there are any reasonable alternatives that have not been considered.

Submitting Your Expression of Opinions

We recommend that you submit your expressions of opinions on the SA incorporating SEA via our on-line consultation hub, at:

www.antrimandnewtownabbey.gov.uk/consultations, as this is the most efficient way to make a representation.

However, you can also submit your opinions by completing this form and returning to us by **5pm on Friday 20 September 2019** either by email or by post.

Please note that opinions received after the closing period will not be accepted and will be subsequently returned.



What Happens Next

Following the public consultation and the comments received in response to the SA incorporating SEA modifications to the draft Plan Strategy may occur. If these modifications are significant, this may lead to additional appraisal against the SA/SEA framework. A further SA will also take place at the next stage of the process known as the Local Policies Plan.

Contact Us

For further assistance, please contact the Forward Planning Team at Mossley Mill, Newtownabbey:

By Post – Forward Planning Team

Mossley Mill, Carnmoney Road North, Newtownabbey

BT36 5QA

By Email – planning@antrimandnewtownabbey.gov.uk

By Telephone – 0300 123 6677



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/gdpr/planning-gdpr/.

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 Department for Infrastructure (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, will 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 - DPO@antrimandnewtownabbey.gov.uk

Phone - 028 9446 3113



SECTION B – YOUR DETAILS

1. Are you 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

	Personal Details	Agent Details (If Applicable)
Title		
First Name		
Last Name		
Job Title (where relevant)		Senior Inspector of Historic Monuments & Senior Architect
Organisation (where relevant)		Historic Environment Division
Client Name (where relevant)		
Address		Department of Communities Historic Environment Division Ground floor 9 Lanyon Place BELFAST
Post Code		BT1 3LP
Telephone Number		
Email Address		



SECTION C – EXPRESSIONS OF OPINIONS

2. Please provide your expressions of opinions on the SA incorporating SEA below:

(Continue on a separate sheet if necessary)

Sustainability Appraisal, incorporating Strategic Environmental Assessment

Glossary – HED would welcome the inclusion of Historic Environment Division in the glossary at Local Policies Plan Stage

Strategic Policy 1: Sustainable Development, Developer Contributions SP1.13 - SP1.17

On the whole HED would agree with the envisaged potential positive scoring outcomes in relation to the historic environment, but we advise that these are dependent on the guidance referred to and how the policy is implemented.

Policy DM 4: Agricultural development

HED welcome the uncertain scoring here, and the explanation within the document. HED also consider it important for council to acknowledge the scale of new agricultural shed development in a modern working farm. These buildings have significant potential to negatively affect both historic landscape character, alongside heritage assets and their settings, due to scale and potential landform alterations in their construction.

Policy DM 6: Development within Centres;

Policy DM 7: Development outside Centres;

Policy DM 8: Development at the Junction, Antrim;

HED advise that while we can foresee potential positive outcomes for the historic environment we consider that there is also potential for negative/uncertain impacts. We particularly highlight the wording of policy DM 7.9, which does not make clear how “the reuse or conversion of buildings will be encouraged” and does not seem as strong as the language in strategic policy SPPS 6.279, which states “Such retail facilities should be located within existing buildings...”

Policy DM 18: Development in the Countryside

Policy DM 18B: Replacement Dwellings – Listed and Vernacular Dwellings

While HED, overall, agree with the uncertain scoring afforded, we advise that there is potential for policy DM 18B to have significant negative impacts with regard to the historic environment, as wall steads which represent the remains of buildings shown on the first edition ordnance survey maps, could be of significant age and may have associated archaeological remains. See our comments in relation to the soundness of this policy approach.

Policy DM 29: Advertisements



While HED, overall, agree with the significant positive scoring afforded for policies that aim to respect the character for where these are proposed, we have concern regarding the lack of hierarchy acknowledged between aspects of the historic environment as set out within SPPS. See our comments in relation to the soundness of this policy approach.

Policy DM 31: Historic Parks Gardens and Demesnes

See our comments in relation to the soundness of this policy. HED advise that we consider the appraisal of this specific policy to be flawed. We consider that the unsound policy item we have referred to results in a weakening of existing policy in PPS6 BH6, and a weakening of the policy articulated in SPPS 6.16 and 6.17. We consider that the impacts on the Historic Environment in relation to DM31.1b specifically are likely to be negative.

Policy DM 33: Conservation Areas

HED, overall, agree with the significant positive scoring afforded for policies that aim to respect the character for where there are proposed. However, we have concern regarding the lack of hierarchy acknowledged between aspects of the historic environment, notably the language used within the policy is not in alignment with the provision set out within SPPS 6.18. See our comments in relation to the soundness of this policy approach.

Policy DM 37: Designated sites of Nature Conservation importance;

Policy DM 38: Protected Species;

Policy DM 39: Habitats, Species and Features of Natural Heritage Importance; and

Policy DM 42: Trees and Development

HED advise that we consider that, given the intertwined relationship between the historic environment, the natural environment and landscape, it is likely that on the whole these policies will deliver positive outcomes in relation to the historic environment objective

Policy DM 41: Coastal Protection

HED advise that we consider this policy will have minor positive outcomes with regard to the historic environment objective. The intertidal and coastal area contains a large number of heritage assets, both recorded and unrecorded (the intertidal zone of Belfast Lough has not yet undergone a full archaeological survey)

Policy DM 44: Mineral Reserve Policy Areas

With regard to text in relation to this assessment, HED advise that the excavation of archaeological remains is in itself a destructive process, albeit one which is carried out scientifically. Although artefacts and records may result, the archaeological site itself will be wholly or partially destroyed and this should be considered in the text and scoring.

Policy DM 45: Renewable Energy Development



See our comments on the policy approach here, specifically wording of DM 45.1. HED advise that we consider the policy as worded has the potential for uncertain or possibly some negative effects with regard to the historic environment objective.

Sustainability Appraisal Scoping Report

5.7.4 Key Sustainability Issues for Physical Resources.

HED would welcome consideration of protected heritage assets (i.e. scheduled monuments) as an issue in relation to quarrying.

5.10.4 Key Sustainability Issues for Climate Change

HED advise that the relationship of the historic environment with climate change should be articulated, e.g. The inherent sustainability of using historic and existing buildings (over new build) should be recognised for its positive impact, both on needs for raw materials and energy expended in producing new buildings

5.14.1 Fifth line of text – these conventions place responsibilities on member states to consider the conservation of archaeological and **architectural** cultural heritage resources.

Page 176: HED advise that the Department for Communities (Historic Environment Division) are the Current Lead responsible for the implementation of the Historic Monuments and Archaeological Objects (NI) Order 1995. The table here should be corrected moving forward to Local Plan Policies stage

Page 197: Areas of Architectural Potential must be amended to read 'Areas of Archaeological Potential'.

HED advise that over all we consider this to be a comprehensive scoping report with clear cognisance taken of our previous comments in updating it.

We have taken this opportunity to provide additional comment on other papers are below:

Evidence Paper 2: Settlement evaluation

HED welcome the considered use of historic environment evidence, which is demonstrated in the Settlement Evaluations Evidence paper. Our comments in relation to this paper highlight where we consider that there may be some constraint in relation to some of the settlements boundary zoning, and also in some cases highlights where further evidence from more recent archaeological excavations particularly, will require some examination and will be of pertinent value in considering zonings and appropriate mitigations at Local Policies Plan Stage. We advise generally that a more in depth assessment will be required, using the historic environment evidence base, for zonings at local policies stage. An important consideration, already illustrated in some of the evaluations and that we



recommend be expanded upon for others, is the role that historic features have played in the naming of places, making them a central feature of local identity and place. We consider it vital that this important aspect of character is given appropriate consideration when zoning and defining new limits.

We note and welcome observations within the evaluations as regards notable, but perhaps less well known, buildings in some of the settlements. We highlight the potential of some of these as candidates for local listing, due to their key contribution in creating the distinctive identity of the settlement character, e.g. the crossroad development character of The Diamond of school hall, Orange hall and vernacular farmyard complex.

We note in some cases the position of arrows close to scheduled monuments, highlighting areas of no apparent constraints in relation to potential for expansion. We highlight the importance of further work and field assessment in relation to assessing potential zonings, and highlight our guidance on setting <https://www.communities-ni.gov.uk/publications/guidance-setting-and-historic-environment> . This further work should take account of these features and other sites of local importance and their settings, and being able to demonstrate at local policies stage how the evidence has been used in informing both zonings and appropriate means of mitigation, such as designation of LLPA or key site requirements.

HED have provided some general comments on some of the settlements below. Our not commenting on other settlements should not be considered as acceptance as to viability of future zonings in areas of no constraint as we would expect the continued use of the historic environment evidence in informing this work and for this to be demonstrated at local policies stage.

BALLYROBERT - Scheduled rath and its setting will constrain and influence zonings at the west of the settlement.

DOAGH – one of the SMR points located south of the settlement is indicative of 13 souterrains (underground structures) which have discovered and recorded variously around the village, this should be considered in zoning and potential key site requirements which might entail archaeological evaluation and assessment to inform mitigation strategies.

TEMPLEPATRICK – Excavations around Templepatrick for the Castle Upton golf course have revealed that there was a high density of prehistoric settlement and ritual activity in this landscape. Furthermore, the point at the west of Templepatrick village ANT 050:119 at the roundabout is indicative of a church site, which would have the potential for possibly extensive buried remains, including human remains. These should be considered appropriately at local policies stage with regard to potential forms of mitigations such as zoning or key site requirements for evaluation and identification of archaeological impacts



KILLEAD – There are archaeological sensitivities around the area of the scheduled monument ANT 55:91 and considerations should include appropriate mitigation such as zoning, designation or key site requirements for evaluation to identify archaeological remains and assess impacts in advance of development.

TOOME – The Toome Canal was recently designated as a scheduled monument along with other elements of the Lower Bann Navigation. Recent excavations around Toome have revealed the presence of Mesolithic camps in this area.

BALLYEASTON – HED advise that the terminology used in the report is wrong and should read Area of Archaeological Potential rather than “Area of Archaeological Interest”.

MILLBANK – HED welcome the designation of the LLPAs at Millbank

ANTRIM-HED advise that more recent knowledge gained from excavations occurring in Antrim highlight areas of extensive archaeological remains close to Steeple Road. We advise that this issue must be carefully considered and further researched at local policies stage, so that key site requirements should include for evaluation to identify archaeological impacts and their mitigation.

EVIDENCE PAPER 7: Historic Environment Evidence

HED welcome the usage of the historic environment evidence base demonstrated in the compilation of this paper, in particular the recognition of the borough’s defence and maritime heritage.

HED provide the following comment:

Page 17-18, 7.1; language should read, “...Specific reference to the location of Listed Building within the LDP is however important, where they form important elements of Local Landscape Policy Areas, **Conservation Area** or Area of Townscape Character (ATC) designations.”

Page 11-12, 3.20; second bullet language should read ... “LDP should, **where appropriate** designate Areas of Significant Archaeological Interest..”

Para 3.30; In light of reference to Granada Convention reference should be made to architectural as well as archaeological heritage

With regard to Section 12, on maritime heritage HED advise that the content could be made more robust when moving forward to local policies plan stage. We have drafted the following to inform a review of this section, which we consider may be helpful in demonstration of a more solid understanding of the evidence base.



Section 12, Historic Maritime Wrecks - (note we suggest changing the title of this section - maritime heritage goes beyond shipwrecks), HED suggested correction: Marine and Maritime Heritage

Northern Ireland's inshore and coastal regions contains a rich archaeological record. This includes material ranging from prehistoric flint tools and logboats to historic harbour installations and First World War shipwrecks, as well as the legacy of coastal military defences, and historic landscape and seascape character.

The marine historic environment can be characterised as comprising the following principal types of heritage asset:

- sites, monuments and landscape of historic, archaeological, architectural or artistic interest, inclusive of wrecks;
- coastal and intertidal archaeology; and
- drowned terrestrial archaeological sites and landscapes.

Some heritage assets have a level of interest that merits statutory protection, through designation. Significant marine or maritime historic sites may be protected by Listing (under the Planning (Northern Ireland) Order 2011); Scheduling (under the Historic Monuments and Archaeological Objects (NI) Order 1995) and Designation under the Protection of Wrecks Act 1973. There are potentially other means of recognising and protecting marine heritage assets, such as the National Register of Historic Vessels; the National Historic Fleet and as controlled sites or protected areas under the protection of Military Remains Act 1986. However, there are many heritage assets that do not benefit from statutory protection but this does not necessarily indicate a lower heritage value.

Maritime heritage assets are irreplaceable and can be damaged, disturbed or destroyed by natural processes and human activities at the coast. Natural processes include seabed change and coastal processes driven by waves, tides and storms. Rising sea levels and increased storm activity due to climate change may exacerbate these processes. Impacts from human activities tend to be driven by use and activity, which impact on the seabed or coastal area. Coastal archaeological interests should be consistently and comprehensively included in environmental assessment procedures for coastal and marine developments (including harbour works, capital dredging projects, cable projects, and waste water treatment and disposal) and other activities requiring sectoral consent.

The UK Marine Policy Statement (UK MPS) states that heritage assets should be enjoyed for the quality of life they bring to this and future generations, and should be conserved through marine planning in a manner appropriate and proportionate to their significance. The implications for the LDP include that any development, will need to conform with the policies set out within the UK MPS and Northern Ireland Marine Plan (once adopted) in order to protect all aspects of the marine environment inclusive of the historic environment which includes historic and cultural



heritage assets. In accordance with the UK MPS, public authorities should adopt a general presumption in favour of the in-situ conservation of maritime heritage assets within an appropriate setting.

It is recognised that there remains the possibility of archaeological remains being present (vessels, artefacts or submerged prehistory) in the nearshore area of the Borough. On the foreshore at Whiteabbey there are the well-preserved remains of broken wooden vessels. These vessels are recorded archaeological monuments (SMR Number ANT 057:501) and probably served as barges supplying coal to the local spinning mill. They are an important and unique reminder of the area's maritime and industrial past. Other vessel remains also lie scattered nearby and close to the remains of a 20th century coal pier, also a recorded monument (SMR Number ANT 057:500). Information about these maritime heritage assets can be found in the Historic Environment Record of Northern Ireland (HERoNI) curated by the Historic Environment Division in the Department for Communities.

HED would be happy to provide comment on any review of this or of other historic environment evidence bases.

EVIDENCE PAPER 21: Place Making and Good Design

HED welcome this paper, however we emphasise the vital role that the historic environment plays in place-making. It provides the basis for settlements, as acknowledged in numerous evaluations within Evidence Paper 2, as they exist today. As per SPPS 4.32 *"Place-making is a people centred approach to the planning design and stewardship of new developments and public spaces that seeks to enhance the unique qualities of a place, **how these developed over time** and what they will be like in the future."* The historic environment and its part in evolution of a place must be understood in informing "contextual design" SPPS 4.32 is therefore a critical component in this approach.

We would welcome a clearer articulation of the importance of understanding historic context of a place toward informing positive place-making in the introduction to this paper. This would also tie in well with the paper on Settlement Evaluations where an evident appreciation of historic context and evolution of a place comes across quite clearly.

Thank you for your comments.

