

LA03/DPS/0109

Forward Planning Team

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

Dear Sir/ Madam,

Date: 19th September 2019**Re: Mr Gary Bates: 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 Gary Bates to make a submission in respect 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 Metropolitan Area of Newtownabbey. In addition to this we draw your attention to specific lands at HydePark Lane/ HydePark Road, Newtownabbey, 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 towns. In particular our client welcomes the settlement hierarchy classification of Metropolitan Newtownabbey as tier 1 in the Spatial Growth Strategy and agrees that the main growth should be focuses in this Metropolitan Urban Area;

(a) *Focus core growth in Metropolitan Newtownabbey*

This is the most sustainable approach and reflects the strategic objectives of the Regional Development Strategy.

However Mr Bates is concerned that a relatively high proportion of the allocation is proposed to be distributed in the countryside and is concerned this would detract from the settlement hierarchy as proposed. 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 Bates is concerned that the Allocation, as set out in Table 6, will enable a greater growth in the countryside to the detriment of the Metropolitan Newtownabbey allocation. The Countryside Allocation of 750 units is significant, accounting for almost 8% of the total growth and is disproportionate to the population demographic and appears to conflict with the Objective of focusing growth in urban areas. This is promoted in the RDS and therefore ought to be reflected in the DPS.

(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 (a) is potentially compromised through objective (e); by allowing disproportionate growth in the smaller settlements /countryside, while the focus should remain in the urban centres. 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.

The following comments are made in respect to Soundness Test:

➤ **Soundness:**

Object on the basis that this policy fails to meet Test CE2 & CE4 in that the allocation to the countryside is disproportionate to the Strategic Growth Plan and population demographics.

➤ **Remedy**

The Plan needs to be updated to increase the Allocation within the Metropolitan Newtownabbey 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.

Policy DM 48 Reservoirs Flood Risk

Mr Bates is generally supportive of the principle to minimise flood risk and understand the concern for development in close proximity around controlled reservoirs. However it is argued that the onus should be on the owner/ operator of the reservoir to ensure it is safe and duly maintained, rather than sterilising lands down slope, particularly in metropolitan areas where there is considerable development pressure to meet population growth. The Policy appears to merely restrict new development, but places no obligation on current owners to protect the existing surrounding area, through monitoring or repair works.

There are a considerable number of dams in this area and it is unreasonable to curtail the development potential and the most efficient use of otherwise developable land within urban areas, without firstly taking steps to require dam monitoring and improvement is undertaken by the owner.

In respect of **Policy 48.2 Reservoirs without Condition Assurance** it is unclear as to the extent to which it applies in or around reservoirs. The opening wording at DM48.2 places a restriction on 'development', but it lacks sufficient clarity to ascertain the extent to which this policy applies. Is this just development of the reservoir itself or in the vicinity of it?

There will also be circumstances where the Assurance has already been given for a particular dam through one application; this should be material when considering application from other applicants who are unable to provide assurance owing to having no control over the dam.

The following comments are made in respect to Soundness Test:

➤ **Soundness:**

Object on the basis that this policy fails to meet Test CE1 & CE2 in that it is unclear as to the extent of the restriction being imposed and therefore lacks a coherent strategy.

➤ **Remedy**

The Plan should be updated to impose greater emphasis on the dam owner to ensure maintenance of the dam in their control. It should also be updated to accurately define the limitation.

Proposed Site for Inclusion in Settlement Limit of Metropolitan Newtownabbey

The lands delineated in Figure 1 below are located at Hyde Park Lane. Accessed via Hyde Park Road, Mallusk, Newtownabbey. The site comprises undeveloped land, located within the existing countryside and is not subject to any protective or restrictive designations.



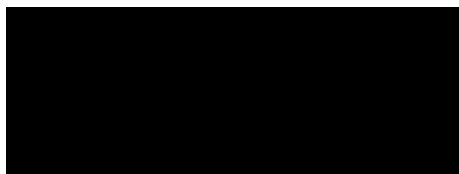
Figure 1 Overview of Lands available for development

The site provides a potential expansion opportunity for Newtownabbey and is well located to tie into recently approved development lands and consequently these lands are particularly well suited to accommodate the future growth of this settlement in that;

- The lands immediately adjoin a committed housing site and would offer a logical expansion and rounding off to the settlement;
- The lands due north and contiguous with the site were consented full planning approval and we understand works are to commence imminently
- There is a suitable means of access provided through the approved housing development to the north
- The site comprises gently sloping topography and would be well suited to providing housing;
- 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
- This site presents a tangible development opportunity to provide housing over the plan period.

We respectfully request our client's land is included within the Settlement Limit for Metropolitan Newtownabbey. This offers a tangible opportunity to meet the future housing needs and offers a logical expansion of the existing settlement. Mr Bates 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 open space.

Mr Bates 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.



Director
Jobling Planning + Environment Limited