



Mr Paul Frazer

Lands at Doagh Road, Newtownabbey

Representation to Antrim and Newtownabbey Borough
Council Local Development Plan 2030 - Draft Plan Strategy

September 2019

Draft Plan Strategy Representation – Lands at Lands at Doagh Road/Monkstown Road, Metropolitan Newtownabbey



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1.0 Introduction

1.1 This representation to the **Antrim Newtownabbey Borough Council ('ANBC') Local Development Plan 2030 ('LDP') Draft Plan Strategy Document ('DPSD')** is made on behalf of **Mr Paul Frazer**, owner of lands located between **Doagh Road/Monkstown Road, Newtownabbey**. This representation builds upon the previous submission on their behalf in relation to the **ANBC Preferred Options Paper ('POP')** made in **April 2017**.

1.2 As per the previous POP submission, in considering this representation, it is important to note that our client has land at Doagh Road/Monkstown Road Newtownabbey which will be made available for future housing development.

1.3 Our client is currently undertaking pre-application discussions with ANBC Local Planning Authority under PAD reference **LA03/2019/0540/PAD** in relation to a development proposal on the lands in question for:

'Proposed residential housing development of 36No. dwellings (8No. apartments and 28No. dwellings), associated open space, landscaping and all ancillary site works, on lands north of Nos. 5-8 Aspen View Doagh Road, and south west of Nos. 26 & 28 Monkstown Road, Newtownabbey'.

1.4 A site location plan is at **Appendix 1** and an indicative site layout drawing subject of the current PAD is at **Appendix 2**.

1.5 On behalf of our client we comment on the ANBC DPSD on the following pages. For ease and to assist Council, this response follows the format of Council's *Local Development Plan 2030 Draft Plan Strategy Response Form* and sets out:

2.0 Section A – Data Protection and Consent;

3.0 Section B – Your Details; and

4.0 Section C – Representation.



Draft Plan Strategy Representation – Lands at Lands at Doagh Road/Monkstown Road, Metropolitan Newtownabbey



- 1.6 Should Council have any queries or wish to discuss this submission we would be happy to do so.
- 1.7 We reserve the right on behalf of DE to expand and supplement this submission in due course in response to any relevant Counter Representations that may be submitted to the Draft Plan Strategy stage of the LDP process and also to comment further at the Draft Local Policies Plan stage.





2.0 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 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, 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





3.0 Section B – Your Details

Please specify if you are 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	Mr	Mr
First Name	Paul	Michael
Last Name	Frazer	Graham
Job Title (where relevant)	c/o Agent	Director
Organisation (where relevant)		WYG Planning
Client Name (where relevant)		Private Client
Address		Michael Graham, WYG Planning, 1 Locksley Business Park, Montgomery Road, BELFAST, BT6 9UP
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4.0 Section C – Representation

4.1 This representation relates to the following parts of the Draft Plan Strategy Document:

- ***Section 3 - Plan Vision & Strategic Objectives (Paragraphs 3.1 -3.15, Pages 53-60);***
- ***Section 4: Sustainable Development
Strategic Policy 1: Sustainable Development
Settlement Hierarchy (Page 71);***
- ***Section 4: Sustainable Development
Strategic Policy 1: Sustainable Development
Spatial Growth Strategy (Paragraphs SP1.6 – SP1.7, Pages 63 - 66);***
- ***Section 7: Homes
Strategic Policy 4: Homes
Housing Growth and Allocation (Paragraphs SP4.1-SP4.3, SP4.7, SP4.8 & Pages 134-138);***
- ***Section 7: Homes
Strategic Policy 4: Homes
Policy DM17: Homes in Settlements (Paragraphs 7.30 – 7.42, Pages 142 – 147);***
- ***Section 8 Community Infrastructure: Protection of Open Space
Policy DM 23: Protection of Open Space (Pages 174 to 176);***
- ***Section 9: Placemaking and Good Design
Strategic Policy 6: Placemaking and Good Design
Policy DM 25 Urban Design (Pages 187-188); and***
- ***Section 11 Natural Heritage
Strategic Policy 8: Natural Heritage
Local Landscape Policy Areas SP 8.2 and SP 8.8 (Pages 237 & 238)
Policy DM40.7 (Page 252).***

4.2 Our client is broadly in support of the DPSD and we comment on the sections listed above in the following paragraphs.





If you consider the draft Plan Strategy to be 'SOUND' and wish to support the draft Plan Strategy, please set out your comments below.

- 4.3 Our client considers that the DPSD is sound in a number of areas which we comment on below.

Section 3 - Plan Vision & Strategic Objectives (Paragraphs 3.1 -3.15, Pages 53-60)

- 4.4 Our client support the Plan Vision and Strategic Objectives as set out at Section 3 (pages 53-60) of the DPSD, in particular that part of the vision which states:

"In 2030 Antrim and Newtownabbey Borough will have a reputation as an excellent, attractive and diverse place in which to live and work. It will be a place that all citizens can take pride in and that is appealing to new residents, investors and visitors alike, with improved job opportunities, housing availability and connectivity that meets the needs of our community"

[our underlining emphasis]

- 4.5 If the Plan Vision is to be delivered, it is important that the correct Strategic Objectives are pursued. In particular, our client welcomes and supports a number of the Strategic Objectives detailed within the DPSD. These include:

- **Strategic Objective 1** which aims to: ***Promote sustainable growth by managing development and securing new infrastructure provision in our settlements and countryside to meet the needs of all our citizens;*** and
- **Strategic Objective 8** which aims to: ***Ensure a sufficient supply of land for new homes, provide a diverse choice of housing and strengthen community cohesion.***

- 4.6 Our client has a modest land holding within the settlement development limit ('SDL') of Newtownabbey located between the Doagh Road and Monkstown Road which he seeks for future development for residential use. The proposed development of the lands for the uses identified will help to promote and deliver a development which boasts an environmentally sustainable design thus helping to meet the strategic objectives of the ANBC LDP.





4.7 Our client agrees with ANBC in its statement at **Paragraph 3.9** of **Page 56** of the DPSD that:

"The provision of a sufficient supply of land for housing is a core component of the LDP. There is currently an ample supply of land already identified in existing development plans, and future growth will need to take account of the Housing Growth Indicator for our Borough set out in the Regional Development Strategy. The LDP will also seek to encourage the delivery of affordable housing opportunities to help meet local needs, and ensure a diverse choice of housing for an ageing and changing population land for housing is a core component of the LDP".

4.8 It is important to note that our client's lands, if identified and developed for housing can assist in providing a sufficient supply of land for housing as a part of the strategic objectives for the LDP. In order to meet the needs and objectives set out within the DPSD and identified housing need Growth Allocation requirements, and should land currently within the existing SDL for the Metropolitan Newtownabbey area not be made or become available, further land should be identified for housing purposes.

4.9 Our client's lands are appropriately located to assist in this regard by delivering additional lands to facilitate the Plan Vision and its Strategic Objectives

Section 4: Sustainable Development

Strategic Policy 1: Sustainable Development

Settlement Hierarchy (Page 71)

4.10 Given the current position of Newtownabbey as part of the Metropolitan Urban Area within the **Belfast Metropolitan Area Plan 2015 ('BMAP')** our client is very supportive of it being retained as Metropolitan Newtownabbey within the ANBC LDP.

4.11 Our client therefore agrees with and supports the proposed Settlement Hierarchy as set out within the DPSD.





Section 4: Sustainable Development

Strategic Policy 1: Sustainable Development

Spatial Growth Strategy (Paragraphs SP1.6 – SP1.7, Pages 63 - 66)

- 4.12 Given the current position of Newtownabbey as part of the Metropolitan Urban Area within **BMAP** and its proposed retention as such within the **ANBC LDP** our client is supportive of the proposed spatial growth strategy, in particular, point (a), which states:

"(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".

- 4.13 In order to address and meet the first point of the Spatial Growth Strategy, it will be important to ensure that there is sufficient land provided to facilitate future housing growth and that the opportunity for new housing sites must be provided.
- 4.14 As indicated above, if our client's lands are identified for the purposes of housing development it will assist in focusing core growth on the Metropolitan Newtownabbey Area and assist in strengthening its role as a primary location for future growth and investment in line with the RDS.
- 4.15 The lands in question are currently identified as an area of existing open space, along with a Local Landscape Policy Area (LLPA) under designation **MNY 45** of **BMAP**. The lands are well located, being situated between both the Doagh Road and Monkstown Road and being only a short distance from Monkstown Village Centre (where there are a number of shops, services and community facilities) and in close proximity to a number of existing areas of employment use on the opposite side of Doagh Road (Caterpillar NI) and to the South East at Monkstown Industrial Estate.
- 4.16 The lands are also abutted by existing residential development directly to the South (Aspen Park) with a housing zoning (**MNY 04/25**) under **BMAP** being located adjacent on the opposite side of the Monkstown Road. The lands are in a suitable location for housing development and are in a better and much more sustainable and strategic location and have better connectivity than many of the existing housing zonings within the Metropolitan Newtownabbey Area as set out in **BMAP**.



- 4.17 As such, the lands in question are situated in a wholly sustainable location for future housing development a fact confirmed by the wealth of surrounding facilities, the identified housing zoning opposite and given their location and proximity to transport connections and existing infrastructure.
- 4.18 Our client's lands are therefore excellently placed to assist in providing for future housing need and community benefits for the Metropolitan Newtownabbey area. The proposed development of the lands will therefore help facilitate the proposed Spatial Growth Strategy set out within the DPSD in terms of focusing core growth on the Metropolitan Newtownabbey Area.

Section 7: Homes

Strategic Policy 4: Homes

Housing Growth and Allocation (Paragraphs SP4.1-SP4.3, SP4.7, SP4.8 & Pages 134-138)

- 4.19 Our client is broadly supportive of the approach taken by ANBC in respect of determining housing growth figures and allocations and in particular, **Strategic Policy 4: Homes** which under **SP4.1** states:

"In order to provide a choice of housing for people in socially balanced and inclusive communities across the Borough, the Council will apply a presumption in favour of the development of new homes provided applications meet the requirements of Policy SP 4 and other relevant policies and provisions of the LDP".

- 4.20 It also states under **SP4.2**:

"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".

- 4.21 Our client is also supportive of the view expressed at **Paragraph 7.7** of **Page 137** of the DPSD in relation to housing growth levels that states:

"The Council estimates that 9,750 new housing units will be required for the period 2015 to 2030 across the Borough. It is however important to understand that this figure is neither a target to be met, nor a cap which cannot be exceeded. Furthermore, the



estimation of future housing growth is not an exact science and a degree of judgement is therefore considered essential in identifying an appropriate level of housing growth over the Plan period”.

- 4.22 This clearly indicates that ANBC is aware that a level of flexibility needs to be applied to housing growth figures during the plan period.
- 4.23 Our client agrees that this provides a balanced approach and one with a reasonable amount of flexibility to assist in delivering required housing figures and also assist in achieving the LDP’s Strategic Objectives.
- 4.24 With regard to Affordable Homes it is noted the ANBC LDP identifies at its **Paragraphs 7.20 to 7.22** that:

“The Council wishes to encourage an affordable and diverse choice of housing that will meet the needs of an ageing and changing population, whilst also encouraging the development of balanced communities and helping to strengthen community cohesion. The Council will therefore seek to facilitate an appropriate mix of housing tenures and sizes within housing developments.

A key consideration in facilitating the right mix of housing tenures is the Housing Needs Assessment (HNA) undertaken by the Northern Ireland Housing Executive (NIHE). The HNA provides an evidence base that highlights specialist housing needs in the Borough, including affordable housing, supported housing and Travellers accommodation. The current HNA (September 2018) indicates a remaining social housing need of 1,272 units to the year 2030, in a number of settlements across the Borough.

In order to facilitate the delivery of affordable housing units within the Borough the Plan includes a detailed policy which seeks to increase the supply of affordable housing through the requirement for all housing schemes over a certain threshold to deliver a percentage of the site as affordable housing. This policy may also be supported by the zoning of land specifically for affordable housing and/or the attachment of Key Site Requirements to general housing zonings for a percentage of the site to be provided as affordable housing in the Local Policies Plan”.





4.25 This position is further consolidated by **SP 4.7** of the **DPSD** which states:

"In order to promote the development of balanced communities and strengthen community cohesion, the Council will work with its statutory partners, Registered Housing Associations and developers to facilitate the delivery of an appropriate mix of housing tenures to meet the needs of all our communities across the Borough".

4.26 **SP 4.8** goes on to state:

"The Council has taken account of the Housing Needs Assessment undertaken by the Northern Ireland Housing Executive which identifies the overall social housing need within our Borough. To assist in the delivery of affordable homes over the Plan period, the Council will require proposals for residential development in settlements to meet the provisions of Policy DM 17 and will also consider the need to zone land in the Local Policies Plan specifically for affordable housing".

4.27 Our client acknowledges the above approach within the DPSD and welcomes the acknowledgement that Council will consider the need to zone land in the Local Policies Plan specifically for affordable and social housing. As stated, our client is currently undertaking pre-application discussions with ANBC Local Planning Authority under PAD reference **LA03/2019/0540/PAD** in relation to social housing development proposal for a varied mix of house types on their lands which are located at a sustainable and accessible location within Metropolitan Newtownabbey which can be made available for future social housing development.

4.28 It is noted that Council's **Evidence Paper 6: Housing** identifies a remaining social housing need to 2030 for Antrim and Newtownabbey Borough Council of 1272No. units. Of this figure a total of 362No. units are identified as being required for the areas of Rathcoole, Monkstown – Whiteabbey and Mossley – Ballyduff within Table 7 (page 23) of the evidence paper.

4.29 The development of residential units on our client's lands will deliver additional and much needed housing, helping to meet the identified social housing need for the Antrim and Newtownabbey Borough Council area. The subject lands are also well located in relation to Monkstown, Mossley and Whiteabbey to assist in meeting the social housing need identified for these areas. The development of the lands



will, in addition to assisting in meeting the identified social housing need, also assist in focusing core growth on Metropolitan Newtownabbey and assist in strengthening its role as a primary location for future growth and investment in line with the Regional Development Strategy (RDS).

- 4.30 The identification of our client's lands for the purposes of housing to meet housing Growth Allocations in what is an extremely sustainable location and assist in meeting the needs, vision and strategic objectives of the ANBC LDP moving forward. It is also important to note that our client is committed to developing the lands for housing and will act quickly to do so if identified for such purposes within the ANBC LDP.

Section 7: Homes

Strategic Policy 4: Homes

Policy DM17: Homes in Settlements (Paragraphs 7.30 – 7.42, Pages 142 – 147)

- 4.31 **Policy DM17** of the **DPSD** relates to Homes in Settlements. The aim of this policy is to:

"promote the development of high quality, attractive and sustainable homes within settlements, which meet the present and future needs of all sections of the population within the Borough".

- 4.32 The provision of the policy is supported in broad terms by our client. In particular **Criterion (a)** of **Policy DM 17.1** relates to new housing development in settlements and states:

"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".

- 4.33 Our client is fully supportive of this aspect of the proposed policy and it is recommended that it be retained as part of any final adopted policy. Our client's lands are well located within the SDL of Metropolitan Newtownabbey to provide a medium density residential layout. The location of the proposed development provides excellent transport connections. There are 2No.bus stops along the western boundary of the subject lands on each side of the Doagh Road (Wilson's Factory, Stop ID:



001442 & Stop ID: 001415) these are both serviced by a number of buses including 1a, 1c, 13, 13a, 13b, 13c, 14, 14b, 14c and 156, that circulate around the Antrim & Newtownabbey Borough and on into Belfast.

- 4.34 The lands are well located, being situated between both the Doagh Road and Monkstown Road and being only a short distance from Monkstown Village Centre (where there are a number of shops, services and community facilities). It is also in close proximity to a number of existing areas of employment use on the opposite side of Doagh Road and to the South East at Monkstown Industrial Estate. The lands are also abutted by existing residential development directly to the South (Aspen Park).
- 4.35 The lands are in a very suitable and highly sustainable location for housing development and therefore deemed to be compliant with the proposed policy.

- 4.36 **Criterion (c)** requires that:

"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".

- 4.37 Our client welcomes this criterion in that it will ensure a mix of housing types, tenures and sizes within settlements thereby helping to assist in delivering sustainable development proposals. It is recommended that it be retained as part of any final adopted policy. Our client is also content through any future development of their lands for residential purposes to provide a varied mix of house types in order to meet the needs of varying sections of the local community.

- 4.38 **Criterion (f)** requires that:

"adequate provision is made for necessary local neighbourhood facilities, to be provided by the developer as an integral part of the development";

- 4.39 This criterion is reflective of current operation policy under ***PPS7 - Quality Residential Developments*** and its inclusion is supported. Such an approach will ensure that any proposals being



brought forward are of a more sustainable nature and are also more robust in terms of delivering benefits to the local community in addition to just housing provision.

4.40 **Criterion (g)** proposes to require:

"A Design and Access Statement to accompany any housing development of 10 or more units".

4.41 Our client sees no issues in this being a policy requirement and would support its inclusion on the basis that it will assist in ensuring the development of high quality, attractive and sustainable places. We would however suggest that clarification is provided on the content of any Design and Access Statement and that the DPSD is clear on when such a document will be required. This is required to ensure that there are no contradictions or inconsistencies with current legislative directions on when Design and Access Statements are required.

4.42 **Policy DM 17.2** sets out that:

"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)".

4.43 **Policy DM 17.2** is supported. ***Creating Places – Achieving Quality in Residential Developments*** is operational planning guidance and our client welcomes the consistency that will occur through the DPSD taking account of this document.

Section 8 Community Infrastructure: Protection of Open Space
Policy DM 23: Protection of Open Space (Pages 174 to 176)

4.44 The DPSD identifies at **Paragraph 8.21** in respect of the protection of open space that:

"The aim of this policy is to protect against the loss of existing open space to other competing uses. This aim has taken account of and is consistent with the provisions of the SPPS which acknowledges that open space, whether or not there is public access to it, is important for its contribution to the quality of urban and rural life".



4.45 **Policy DM 23: Protection of Open Space** states:

"DM 23.1 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.

DM 23.2 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.

DM 23.3 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 For the purposes of this policy, open space is defined as all open space of public value".

[underlining emphasis]

4.46 Our client is broadly in support of the provisions of **Policy DM 23** and in particular the first exception test under **DM 23.3** which allows for development that would bring significant community benefits that clearly outweigh the loss of the open space. This exception test is applicable to the future development of our client's lands for residential purposes and mirrors current operational policy under **Policy OS1 - Protection of Open Space** of **PPS8** which also provides for such exceptions.

4.47 As has been identified as part of the PAD process under **LA03/2019/0540/PAD** the provision of social housing on our client's lands will bring substantial community benefit that outweighs the loss of the open space at this location. The area of open space to be lost is small in nature (it forms only a



very small part of Three Mile Water Park) and therefore the use of the subject lands for housing to meet identified social housing need requirements will, in our opinion, be of more benefit to the local community. Provision of social housing will provide a greater benefit to a wider cross section of the community in that it will address an identified need for same as has been set out above.

- 4.48 In addition, other benefits will also arise from the identification and development of our client's lands for social housing. There will also be several indirect economic benefits to the local community. These include the creation of construction jobs and expenditure in the local economy during the construction stage of any development.
- 4.49 Substantial capital expenditure through the construction phase of the development will create economic benefit including employment, both directly and indirectly. Direct employment includes those employed by the construction of the project itself; indirect employment includes those employed in supplying the inputs to the project, e.g. supply chain; and, induced employment includes those employed to provide goods and services to meet consumption demands (wider economy e.g. retail).
- 4.50 Any such development will also offer significant procurement opportunities and indirect employment opportunities for local material suppliers and sub-contractors during the construction phase. The construction of the proposed development will require support by activities such as concrete production, etc., all of which are likely to benefit locally.
- 4.51 When considering the reasons set out above, it is clear that there are substantial community benefits which would be accrued through the development of our client's lands for the purposes identified and outweigh the loss of what is a very small amount of open space at this location.
- 4.52 The remainder of the existing open space zoning will remain untouched and the development will deliver a high-quality development in this location within the SDL of Metropolitan Newtownabbey, which will assist in meeting social housing need and achieving sustainability goals. The proposal complies with the requirements of current operational planning **Policy OS1** through meeting the first exception test and also complies with the proposed **Policy DM23.2** of the DPSD through meeting its first exception test.
- 4.53 In addition, our client also welcomes the inclusion within the amplification to **Policy DM 23** at **Paragraph 8.18** of **Page 175** of the DPSD where it identifies that:



"Examples of significant community benefit acceptable under the policy may include the provision of social housing where a demonstrable local need is identified or the development of a local facility which has the support of the wider community. In all such cases, the onus will be on the developer to demonstrate the rationale for the development and that it will not result in any significant loss to overall green infrastructure provision taking account of the current and future open space needs of the wider locality".

[underlining emphasis]

- 4.54 The use of our client's lands for social housing would fully accord with this amplification. It will provide community benefit through delivery of such housing and also deliver a need for such housing as identified in the LDP.
- 4.55 Our client is therefore fully supportive of this policy and the specific reference to social housing within the amplification as an example of significant community benefit that would support the first exception test to DM 23.2. Our client is therefore of the opinion that this policy must be retained as part of any final Draft Plan Strategy.

Section 9: Placemaking and Good Design

Strategic Policy 6: Placemaking and Good Design

Policy DM 25 Urban Design (Pages 187-188)

- 4.56 The DPSD identifies that the aim of this policy is to promote high quality design which is responsive to the local character and distinctiveness of the urban places of the Borough and which is based on the principles of positive placemaking.
- 4.57 **Policy DM 25.1** requires that:

"The Council will require development within settlements to demonstrate a clear understanding of the characteristics of the site, its wider context and how the proposal will connect with the surrounding area".





- 4.58 The policy also requires that all development will be expected to deliver high quality design in its layout and appearance and demonstrate that it has considered a number of criteria which include: *Placemaking and Good Design; Movement and Connectivity; Well Being and Safety; Landscape and Biodiversity; and Environmental Resilience.*
- 4.59 Our client agrees that developments whether in the settlements or in the countryside are required to demonstrate a design led approach. A design led approach will be utilised to deliver a sense of place within our client's lands should they be identified for housing. This is already evident in the Indicative Site Layout Drawing which has been submitted and discussed with ABCBC LPA under PAD reference **LA03/2019/0540/PAD** (refer to Appendix 2).
- 4.60 The overall concept of the development is to deliver new residential development with associated open space, landscaping and ancillary site works to the area. The layout will provide residential development which lends itself to the character of the surrounding area, whilst also ensuring a quality design and a good mix of house types.
- 4.61 Any proposed residential development on our client's lands will be of high quality in keeping with the adjacent development of Aspen View. The design and layout of any dwellings will integrate appropriately within the subject lands and will respect and reflect built form, scale, massing, materials and heights of development already existing and established within this area.

Section 11 Natural Heritage

Strategic Policy 8: Natural Heritage

Local Landscape Policy Areas SP 8.2 and SP 8.8 (Pages 237 & 238)

Policy DM40.7 (Page 252)

- 4.62 Our client's lands are currently situated within a Local Landscape Policy Area (LLPA) under designation **MNY45 - Three Mile Water** within **BMAP**. With regard to LLPAs the DPSD provides strategic policy at **SP 8.7** and **SP 8.8**. These state:

"SP 8.7 These comprise 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. They may include:



- (a) Archaeological sites and monuments and their surroundings;*
- (b) Listed and other locally important buildings and their surroundings;*
- (c) River banks and shorelines and associated public access;*
- (d) Attractive vistas, localised hills and other areas of local amenity importance;*
- (e) Areas of local nature conservation interest, including areas of woodland and important tree groups; and*
- (f) Buffer landscape wedges and open areas adjacent to settlements whose protection is important in maintaining the separate identities of settlements and preventing urban coalescence.*

SP 8.8 The Council will identify the location and precise boundaries of Local Landscape Policy Areas within and adjoining settlements in the Local Policies Plan”.

4.63 Our client notes that the Council will identify LLPAs in the Local Policies Plan and reserves the right to comment further on this aspect at that stage of the LDP process.

4.64 The DPSD goes on to provide a specific detailed management policy in respect of LLPAs under **DM 40.7** (Page 252) which states:

“Development within a LLPA will only be permitted where the proposal accords with any provision of the Local Policies Plan and the Council is satisfied that it will not have an unacceptable adverse impact on the landscape feature(s) that the designation is intended to protect and will not diminish the overall landscape character/integrity of the area”.

[underlining emphasis]

4.65 The development of our client’s lands will result in any unacceptable adverse effect upon the features of the LLPA as currently designated under BMAP or the landscape character of the area. As shown on the Indicative Site Layout Drawing at Appendix 2, the indicative design is respectful of the LLPA designation and will ensure no adverse effects occur. Again, our client reserves the right to comment further in relation to LLPAs at the Local Policies Plan stage of the LDP process.



If you are seeking a change to the draft Plan Strategy, please indicate how you would like your representation to be dealt with at Independent Examination:

- 4.66 In accordance with **Section 10(7)** of **The Planning Act (Northern Ireland) 2011**, should ANBC submit the DPSD in its current form to the Department for an independent examination, we request that we are given the opportunity on behalf of our client to appear before and be heard at the examination by way of an **Oral Hearing**.

Signature:

	
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Date:

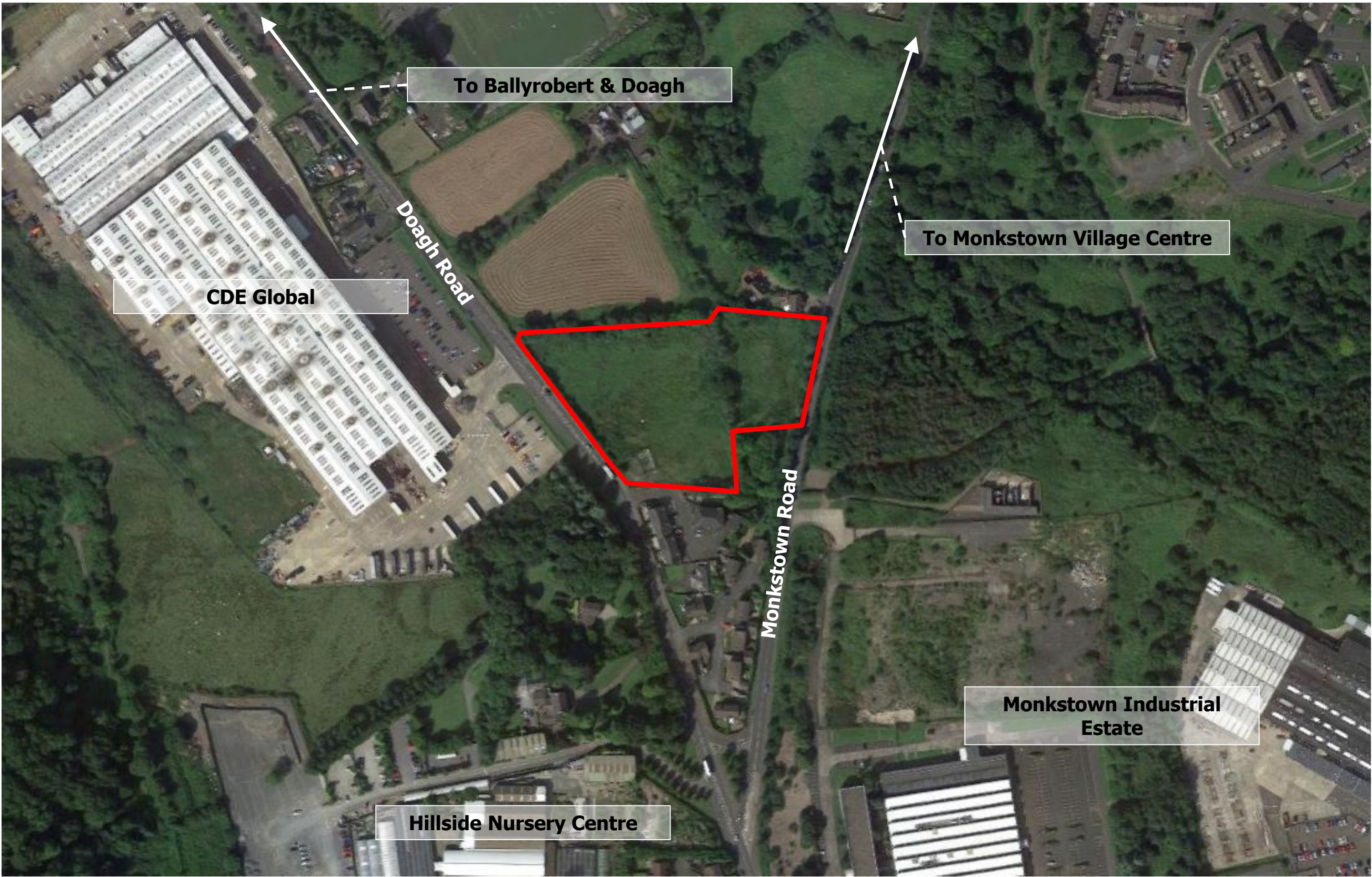
20 th September 2019





Appendix 1





Legend

 Site Location

Lands at Doagh Road/Monkstown Road,
Newtownabbey

Site Location Plan



Scale: NTS

Date: June 2019


Job No: A100847



Appendix 2





<div></div> <div>WARWICK STEWART ARCHITECTS</div> <div>PROJECT MANAGERS • INTERIOR DESIGNERS • CDM COORDINATORS</div>		<div>PROJECT</div> <div>PROPOSED HOUSING DEVELOPMENT @ DOAGH ROAD, MONKSTOWN</div>		
<div>892 ANTRIM ROAD, TEMPLEPATRICK, COUNTY ANTRIM, BT39 0AH</div> <div>Tel: +44(0)28 9443 9071 Fax: +44(0)28 9443 2538</div> <div>Email: info@warwickstewart.co.uk</div> <div>Web: www.warwickstewart.co.uk</div>		<div>CLIENT</div> <div>MR P FRAZER</div>		
		<div>DRAWING</div> <div>INDICATIVE SITE LAYOUT DRAWING</div>		
<div>PROJECT NO</div> <div>BS_12026</div>	<div>DRAWING NO</div> <div>A02</div>	<div>DATE</div> <div>MAY' 2019</div>	<div>SCALE</div> <div>1:500</div>	<div>DRAWN BY</div> <div>CHECKED BY</div> <div>BW</div> <div>BW</div>