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November 2019

Dear Sir / Madam,

RE: Historic Environment Division Counter Representation to representations made in reference to the Antrim and Newtownabbey Draft Plan Strategy

Historic Environment Division (HED) has reviewed the representations made to Antrim and Newtownabbey District Council and provide general statement on the following representations:

Prefixed by LA03/DPS/

0004, 0005, 0006, 0023, 0024, 0027, 0028, 0031, 0033, , 0039, 0040, 0041, 0043, 0044, 0045, 0052, 0065, 0068, 0069, 0071, 0072, 0078, 0079, 0080, 0084, 0085, 0090, 0095, 0097, 0098, 0099, 0100, 0104, 0105, 0109, 0114, 0120, 0121

HED advise our previous comments, on soundness of the historic environment policy approach in the draft Plan Strategy (dPS), remain unchanged (see ref: LA03/DPS/0032).

To aid council to remain sound under the **Consistency Test (C3)** and **Coherence and effectiveness test (CE2)** at Local Policies stage of plan making we comment as follows:

The above listed representations have all included location maps indicating parcels of land which the landowners wish to be considered for development lands, residential or otherwise. While we consider the dPS to be the inappropriate stage to include the specific identification of lands, this should be through the Local Policies Plan stage of the process

HED reiterate, that when council are considering specific identification of lands these should be founded on a robust assessment of the historic environment evidence base (among others) to

inform land zonings for development. Council must be in a position to demonstrate how this has been taken into account, and how it has been utilised to inform potential forms of mitigation such as appropriate designation or other appropriate key site requirements e.g. for evaluation and identification, of previously unidentified archaeological remains.

In conclusion, Historic Environment Division advise the above comments are toward ensuring that land zoning is carried out in accordance with the requirements of **soundness** under the Consistency Test (C3) and Coherence and Effectiveness Test (CE2). Given the insufficient nature of assessment in relation to the historic environment we consider that the zonings put forward in the above referenced representations are not based on robust evidence and would not meet this soundness test.

Yours sincerely,

[Redacted Signature]

Senior Inspector of Historic Monuments

[Redacted Signature]

Senior Architect

Heritage Records & Designations Branch

Cc [Redacted] (HED Assistant Director)
[Redacted] (HED Assistant Director)