
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, including 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 submissions of representations, beginning on **Friday 26 July and closing on Friday 20 September 2019 at 5pm.**

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.

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

Published alongside the draft Plan Strategy are a range of assessments including Sustainability Appraisal (incorporating the Strategic Environmental Assessment), a draft Habitats Regulation Assessment and an Equality (Section 75) Screening and Rural Needs Impact Assessment Report. These assessments are also subject to public consultation during the formal public consultation period closing on Friday 20 September 2019 at 5pm.

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.



Soundness Testing

A key feature of Northern Ireland's new Planning System is 'Soundness' which requires the draft Plan Strategy document to be tested at Independent Examination (IE) in terms of content, conformity and the process by which it has been prepared. Derived from established practices in England and Wales, it is considered that 'Soundness' testing will provide a more effective basis for examining Local Development Plans and consequently contribute towards a shorter IE process.

The purpose of the IE is to determine if the draft Plan Strategy satisfies statutory requirements and is 'sound'. The presumption will be that the draft Plan Strategy is 'sound' unless it is shown to be otherwise as a result of evidence considered at the IE stage.

The tests of soundness are based upon three categories which relate to how the draft Plan Strategy has been produced, the alignment of the document with central government regional plans, policy and guidance and the coherence, consistency and effectiveness of the content of the draft Plan Strategy. The tests of soundness are set out below:

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.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.
*Development Plan Document (DPD) – Comprises of the draft Plan Strategy	

Further information on Soundness can be found in Development Plan Practice Notes published by the Department for Infrastructure (DfI). Of particular relevance is Practice Note 6 'Soundness' (Version 2) and Practice Note 9 'Submission and Handling of Representations', both are available to view at <https://www.infrastructure-ni.gov.uk/publications/development-plan-practice-notes>.

In addition, the Planning Appeals Commission has also produced guidance entitled 'Procedures for Independent Examination of Local Development Plans' available at <https://www.pacni.gov.uk/procedural-guides>.

Making a Representation

As the main purpose of the IE is to determine whether the Development Plan Document (DPD) is 'sound', any person(s) wishing to make a representation to any part of the Plan should do so on the grounds of soundness. Any representation proposing a change to the Plan must demonstrate why the document is not sound having regard to the tests of soundness. Every representation should say precisely how the Plan should be changed in order to achieve soundness and should be supported, succinctly, by all the evidence thought necessary to justify the proposed change. Once the public consultation period has closed, **there will be no further opportunity to submit information unless the Commissioner requests it.**

Where several people share a common view on how the draft Plan Strategy should be changed, we encourage you to co-operate with each other, pool resources and make a single representation, for example, a local community group.

Those who make representations to the draft Plan Strategy should state whether they wish to have their representation considered at IE in writing or as an oral hearing. Unless people specifically request an oral hearing, the Commission will proceed on the basis that you are content that your representation will be considered in writing. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orally or in written form.



Points to Remember:

- Representations will be made publicly available for inspection at the Council's Offices and online for counter-representations;
- Complete all relevant sections of the response form;
- Clearly state why you consider the draft Plan Strategy to be 'unsound', having regard to the soundness tests;
- There will be no further opportunity to submit information once the public consultation period closes unless the Commissioner requests it;
- We would encourage you to submit separate forms for each representation you wish to submit;
- Every representation should say precisely how the draft Plan Strategy should be changed in order to achieve soundness;
- Representations should be supported, succinctly, by all the evidence thought necessary to justify the proposed change; and
- Clearly, state whether you wish for your representation to be heard orally or in writing.

Submitting Your Representation

We recommend that you submit your representation 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 make a representation by completing this form and returning to us by **5pm on Friday 20 September 2019** either by email or by post.

Representations received after the closing period will not be accepted and will be subsequently returned.

What Happens Next

When the consultation has closed, the Forward Planning Team will collate the representations received and as soon as reasonably practicable, publish these online for a further 8-week period of consultation to allow counter-objections to be made. The representations will also be available for public inspection during this period at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to 5pm.

Once this period of counter-representations has closed, the Forward Planning Team will collate the counter-representations and publish these online. They will also be made available for public inspection at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to



5pm. The next anticipated step will be for the Council to contact the Department for Infrastructure to request an Independent Examination of the draft Plan Strategy.

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 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



SECTION B – YOUR DETAILS

2. 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		Dr
First Name		Michael
Last Name		Gordon
Job Title (where relevant)		Director/ Head of Planning Northern Ireland
Organisation (where relevant)		Turley
Client Name (where relevant)	Toland House Properties Limited	
Address	21-23 Chapel Hill Lisburn	Hamilton House 3 Joy Street Belfast
Post Code	BT28 1EP	BT2 8LE
Telephone Number	028 9061 4060	028 9072 3900
Email Address		michael.gordon@turley.co.uk



SECTION C – REPRESENTATION

Your comments should be set out in full. This will help the Independent Examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

3. To which part of the draft Plan Strategy does your representation relate?

i) Paragraph Number: 3.1 and Plan Vision

ii) Policy Heading: _____

➤ Strategic Policy (SP) Paragraph Number:

SP4 (4.2; 4.3 (inc. Table 6); 4.4)

➤ Detailed Management Policy (DM) Paragraph Number:

iii) Page Number in Document: 54; 134- 139

iv) Proposal Map (if relevant state location): _____

4. Do you consider the draft Plan Strategy to be:

☐ 'Sound' (*i.e. support*)

☒ 'Unsound' (*i.e. object*)

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



(Continue on a separate sheet if necessary)

6. If you consider the draft Plan Strategy to be **'UN SOUND'** please identify which test(s) of soundness your representation relates to having

regard to the Department for Infrastructure's published Development Plan Practice Note 6 'Soundness' (Version 2).



Soundness Tests:

- ☐ **P1** - Has the DPD¹ 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?
- ☒ **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 DPD had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining Council's district?
- ☒ **CE1** - Does 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 DPD's of neighbouring Councils?
- ☐ **CE2** - Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?
- ☐ **CE3** - Are there clear mechanisms for implementation and monitoring?
- ☒ **CE4** - Is it reasonably flexible to enable it to deal with changing circumstances?

Details

7. Please give details of why you consider the draft Plan Strategy to be '**UNSOUND**' having regard to the test(s) you have identified above. Please be as concise as possible.

¹ Development Plan Document (DPD) – Comprises of the draft Plan Strategy



Please Note: Your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **This representation will be considered during the IE and here will be no further opportunity to submit information unless the Commissioner requests it.**

Refer to enclosed report 'Response to Antrim and Newtownabbey Borough Council Draft Plan Strategy - Toland House Properties (Dunadry)'



(Continue on a separate sheet if necessary)



Modifications

8. If you consider the draft Plan Strategy to be '**UNSOUND**', please provide details of what, if any, modifications do you think should be made to the section, policy or proposal which your representation relates to? What specific modifications do you think should be made in order to address your representation? Please briefly state how your proposed alternative would meet the requirements of the Sustainability Appraisal and other published assessments.

Refer to enclosed report 'Response to Antrim and Newtownabbey Borough Council Draft Plan Strategy - Toland House Properties (Dunadry)'



(Continue on a separate sheet if necessary)



9. 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:

Please Note: Unless you specifically request an oral hearing, the Commission will proceed on the basis that you are content to your representations considered in written form only. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orally or not.

Please select only one item;

☐ Written Representation

☒ Oral Hearing

Signature:

Catriona Blair on behalf of Turley

Date:

20 September 2019

Thank you for your response.



**Response to Antrim & Newtownabbey
Borough Council draft Plan Strategy
Toland House Properties (Dunadry)**

September 2019

Turley

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Executive Summary

1. Founded in 1982, Toland House Properties Limited has become one of Northern Ireland's leading residential property developers. They place a premium on quality resources and craftsmanship, sourcing bricks and tiles from throughout Europe, choosing specialist kilns and furnaces.
2. In their Mill developments, they have focused on preserving and integrating original stonework. The result is a rare blend of the modern and traditional, enabling them to tailor each development in harmony with its environment.
3. Recent developments include Summerhill in Dunadry, The Halls in Templepatrick (a National House-Building Council award winning development), Pigeontown Mews in Glenavy and Mount Eagles, Belfast.
4. Toland House Properties Limited welcomes this opportunity to response to the Council's invitation to join the debate on the key issues of strategic significance which are likely to influence the direction of future development within the Borough.
5. The context for this representation is the Company's land adjacent to Old Mill and Shaneoguestown Road, Dunadry , which is not currently zoned under the Antrim Area Plan 1984-2001 and its alterations (AAP) nor the *draft* Antrim Area Plan 2005.
6. We support the ambition and drive of ANBC in terms of its vision for the Council area however, having reviewed and considered the Local Development Plan, we consider the Plan to be unsound. The legal compliance tests have not been met, and the following policies contained within the Draft Plan Strategy are unsound.
7. Below is a summary of our key comments and suggested modifications;

Summary of Key Comments

Policy	Comment	Soundness Test	Cross ref.
Vision	Whilst the Vision of the draft Plan Strategy is supported, insofar as the Vision refers to 2030, the plan period should be extended to 2035 to increase the potential for the plan to take full account of RDS directions and achieve its own Spatial Growth Strategy.	C1, C3, CE4	Chapter 4
SP4	Strategic Policy 4: Homes is unsound as the policy fails the tests of C1 and CE1. The proposed housing allocation to Dunadry is too low. A modest increase is required to reflect the RDS, Spatial Growth Strategy and its elevation in the settlement hierarchy.	C1, CE1, CE2	Chapter 6

1. Introduction

1.1 This representation has been prepared on behalf of Toland House Properties Ltd, in response to a consultation on the Antrim and Newtownabbey Borough Council ('the Council') Local Development Plan (LDP). On 28 June 2019, the Council published their LDP Draft Plan Strategy ('DPS') for a pre-consultation period, which ran until 25 July 2019. The period of formal consultation ran from a period of 8 weeks, closing 20 September 2019. This representation responds to the contents of the DPS.

1.2 The following background documents, prepared by the Council have also been considered in preparing these representations:

- Evidence Paper 1 – Population;
- Evidence Paper 2 - Settlement Evaluation;
- Evidence Paper 6 – Housing;
- Evidence Paper 18 – Rural Pressure Analysis;
- Evidence Paper 21 – Placemaking and Good Design; and
- Sustainability Appraisal (SA) incorporating Sustainable Environmental Assessment (SEA).

Structure of the representations

1.3 This report responds to the draft Plan Strategy as follows:

- Chapter 2 identifies the tests of soundness in plan making;
- Chapter 3 considers legislative compliance;
- Chapter 4 considers the Plan's vision and ambition;
- Chapter 5 considers SP1 Sustainable Development;
- Chapter 6 considers SP4 Homes;
- Chapter 7 sets out Site Specific Considerations.

2. Soundness in Plan Making

- 2.1 The keystone of the local development plan system is the principle of ‘soundness’. Section 10(6) of the 2011 Act provides that the purpose of the Independent Examination (IE) is to determine, in respect of the development plan document;
- a. whether it satisfies the requirements of sections 7 and 8 or, as the case may be, sections 7 and 9, and any regulations under section 22 relating to the preparation of development plan documents; and
 - b. whether it is sound.
- 2.2 The Planning Act (Northern Ireland) 2011 does not define the meaning of ‘soundness’. However, Development Plan Practice Note 6 – Soundness (DPPN 6), dated May 2017, suggests that it may be considered in the context of its ordinary meaning of ‘showing good judgement’ and ‘able to be trusted’.
- 2.3 Furthermore, DPPN 6 states that the tests of soundness are based upon three categories. These three categories relate to:
- how the development plan document (DPD) has been produced;
 - the alignment of the DPD with central government regional plans, policy and guidance; and
 - the coherence, consistency and effectiveness of the content of the DPD.
- 2.4 DPPN 6 advises that ‘soundness’ involves testing the principles, content and preparation process of the DPD against a list of key criteria. DPPN 6 then sets out the following tests which ‘...aim to provide a framework to assess the soundness of the DPD, whilst taking account of all relevant procedural, legislative and policy considerations’:

Procedural tests

- P1. Has the plan 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 plan been subject to sustainability appraisal including Strategic Environmental Assessment?
- P4. Did the council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?

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 plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans 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.
- CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.

- 2.5 Although the tests of soundness are based upon three categories – procedural, consistency, coherence and effectiveness, there is a degree of overlap in terms of the criteria used for each test. The purpose of the IE will be to examine how the DPD meets each test and determine whether the DPD is sound as a whole.
- 2.6 This representation has considered the DPS and the commentary provided in the following chapters considers whether the plan meets these tests of soundness.

3. Legislative Compliance

Planning Act (Northern Ireland) 2011

- 3.1 Under Part 2 (8) of the Act the Plan Strategy must set out:
- the council's objectives in relation to the development and use of land in its district;
 - its strategic policies for the implementation of those objectives; and
 - such other matters as may be prescribed.
- 3.2 The Act also stipulates that the Plan Strategy should be prepared in accordance with the Council's Timetable, as approved by the Department and in accordance with Council's Statement of Community Involvement.
- 3.3 The latest version of the Local Development Plan (LPD) timetable available on Council's website, dated July 2018 cites the publication of the dPS in Q4 2018/2019. We acknowledge that this was an estimate, however in practice the dPS was published in Q2 2019/2020; 4 months after the agreed date set out in the timetable. In line with the direction set out in the Act, we would respectfully suggest that consideration should be given to modifying the timetable.

The Planning (Local Development Plan) Regulations (Northern Ireland) 2015

- 3.4 Regulation 15 identifies a schedule of the information that should be made available alongside the publication of the dPS. This includes:
- 'Such documents as in the opinion of the council are relevant to the preparation of the local development plan.'*
- 3.5 Our reading of this Regulation is that supporting evidence used to inform or support a draft policy should be provided alongside the draft plan strategy. We have identified several instances where there is a gap in the information base and accordingly contend that the Plan has failed to address procedural test 4.

4. The Council's Vision & Ambition

In order to meet tests of soundness C1, C3 and CE4, the plan period should be extended and/or the housing allocation should be increased.

Plan Period

- 4.1 The plan horizon is to 2030 –calculated as 15 years from 2015 when Council assumed plan making responsibility. On the basis of the Council's latest published timetable, the Local Policies Plan (LPP) part of the plan is not anticipated to be adopted until the end of 2023/2024.
- 4.2 Given the risks to programme, it would be optimistic to suggest that the LPP part of the Plan would be adopted during 2024. Arguably 2025 or 2026 would be more likely. This would leave only four or five years of a plan period to 2030. The decision for the Council then would be whether to undertake the five year review of the plan or start a new plan making process at this point.
- 4.3 Whilst it is obviously understood that plans are material beyond their stated end date, given the time and resources being invested in the process by the Council, consultees and stakeholders, getting the most out of the plan making process is critical, particularly given the age of the 'legacy' plans such as the Newtownabbey Area Plan and the Antrim Area Plan.
- 4.4 The length of time it takes to prepare applications and secure planning permission on freshly zoned land is also an important consideration – a newly zoned site for housing or employment in 2026 would not be likely to be able to be commenced until 2028.
- 4.5 Belfast City Council has taken a slightly longer term view and established a plan period to 2035. Derry City & Strabane District Council has set out a plan period to 2032.
- 4.6 A longer plan period, to 2035 would not only provide more scope to better reflect the direction of the RDS, it would also make it more likely that the final plan could clearly and distinctively move the statutory plan for the Borough beyond the 'inherited' strategies, limits and zonings of the legacy plans - this would also be consistent with the Development Plan Practice Note 01 reference to a 15 year plan framework. Otherwise the risk is that when the LPP part of the plan is finally adopted, comparison with the previous plans could raise questions around what has actually changed. With the repatriation of planning to local government, this would not be a welcome part of the debate for the new Council's first plan.
- 4.7 Selection of a longer plan period would also reduce the risk of having to identify additional reserves of land to bridge a gap which might emerge in future. This has been the experience in other plan-making exercises such as the Lisburn Area Plan 2001 and BMAP.
- 4.8 The Council was previously (POP Stage) of a mind to increase the housing allocation by 3,250 for a five year period after the end of the plan period. The principle of such an

extension would allow flexibility (soundness test CE4) and help the plan achieve its stated objectives around focusing growth on Metropolitan Newtownabbey and Antrim, strengthening their roles (Spatial Growth Strategy (a)).

Plan Vision and Strategic Objectives

- 4.9 Toland House Properties Ltd support the Councils Plan Vision for Antrim and Newtownabbey to be a place of economic opportunity; a vibrant and liveable place; and a place with a sustainable future.
- 4.10 The 14 strategic objectives set out are supported – particularly the objective to *‘ensure a sufficient supply of land for new homes, **provide a diverse choice of housing** and strengthen community cohesion.’*

5. Strategic Policy 1 - Sustainable Development

Strategic Policy 1: Sustainable Development – Toland House Properties Limited support this Policy and the recognition of Dunadry as a ‘Village.’

- 5.1 Strategic Policy 1 ‘Sustainable Development’ sets out the Councils Spatial Growth Strategy.
- 5.2 The Spatial Growth Strategy is as follows;
- 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.*
- 5.3 The DPS sets out the proposed classification of settlements in the Borough. Of note, Dunadry has been elevated from a Hamlet (6th tier settlement) to a Village (5th tier settlement).
- 5.4 The Spatial Framework Guidance (SFG 13) goes on to state the following aim for small towns, villages, hamlets and the open countryside;

‘Sustain rural communities living in smaller settlements and the open countryside’

- 5.5 Importantly, the DPS recognises *‘the importance of **sustaining our Borough’s rural community** and seeks to allow **appropriate growth in our smaller settlements** and the countryside.’*
- 5.6 The Settlement Evaluation undertaken by the Council (Evidence Paper 2) recognises that *‘Dunadry plays a role and function and possesses a level of infrastructure that places it within Level 1 of the RDS Settlement Hierarchy and Related Infrastructure Wheel and as such should be designated as a village.’*
- 5.7 According to the 2011 Census, Dunadry has a population of 430 persons. Villages in the Borough have populations in the range 380 to 1,440 and benefit from a range of services.
- 5.8 Toland House Properties welcome the reclassification of Dunadry as a Village as this is more reflective of its size and function in the Borough.

6. Strategic Policy 4 – Homes

Strategic Policy 4: Homes is unsound as the policy fails the tests of C1, CE1 and CE2.

The proposed housing allocation to Dunadry is too low. The evidence base suggests ineffective supply. A modest increase is required to reflect the RDS, Spatial Growth Strategy (d) and its elevation in the settlement hierarchy.

Housing Growth & Allocation

- 6.1 Strategic Policy 4 identifies the requirement for 9,750 new homes of the period 2015 to 2030. We acknowledge that in formulating this figure, Council has sought to balance the pre-crash build rate of 748 units per annum against the Housing Growth Indicator (HGI) average build rate of 554. The figure of 9,750 units is based on an average of these two rates and projected forward i.e. 650 units x 15 years = 9,750.
- 6.2 Strategic Policy 4 provides a growth allocation for settlements in the Borough. Dunadry has been assigned 10 units which equates to 0.1% of the overall allocation.
- 6.3 The Draft Plan Strategy places a clear focus on the *'importance of **sustaining our Borough's rural community** and seeks to allow **appropriate growth** in our smaller settlements and the countryside.'*
- 6.4 The Spatial Growth Strategy aims to;

*'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.'*
- 6.5 In the context of the suggestion of extending the plan period to 2035, we consider that a larger (but still modest) allocation to Dunadry would better reflect its elevation in the settlement hierarchy.
- 6.6 The DPS states that *'a critical consideration in bringing forward future housing zonings will be **those committed housing sites** in Metropolitan Newtownabbey, Antrim, Ballyclare, Crumlin and Randalstown; and **where appropriate within the villages** of the Borough.'*
- 6.7 The Housing Topic Paper sets out that Dunadry has a committed housing supply of 24 units – this will have been a consideration in the further allocation of 10 units to the Village.
- 6.8 On review of the housing completion data within Appendix 5 of the Housing Paper, it is clear that no dwellings have been completed in Dunadry since 2015.
- 6.9 We would therefore question the deliverability of the committed sites which have been considered. Sites which are deliverable in the short to medium term (such as the subject lands) should be considered within this allocation to ensure that the required housing is delivered and the Village population and services are sustained.

Housing Market Analysis

- 6.10 While Evidence Paper 6, paragraph 3.28 notes that the SPPS indicates that housing allocations in LDPs should be informed by (inter-alia) a Housing Market Analysis we cannot find any reference to the assessment.
- 6.11 Chapter 2 of the DPS (Setting the Context) also states;
- ‘...Whilst household size will reduce, it is projected that by 2030, the largest housing growth will be ‘one person’ households, followed closely by ‘two person’ households. These changes highlight the need to not only ensure an adequate supply of land for housing, but also to help meet a range of housing types to address the different/diverse needs of the population.’*
- 6.12 A Housing Market Analysis should be undertaken to inform the final housing requirement for the area but to also consider the types and tenure of housing required.
- 6.13 Whilst assumptions are made in respect of one and two person households and their requirements, as well as the aging population – a further evidence based analysis should be undertaken to establish the wider range of potential requirements – such as larger family homes.
- 6.14 We would recommend a Strategic Housing Market Analysis is undertaken.

Identification of Lands for Housing

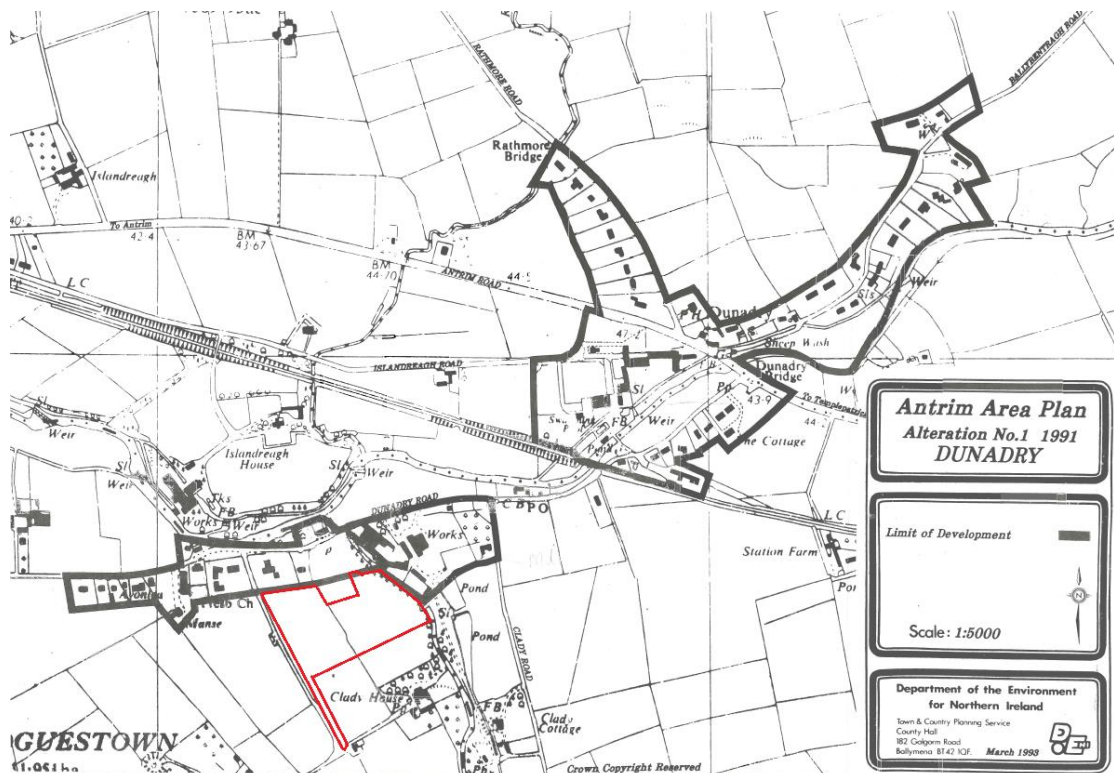
- 6.15 Notwithstanding the comments above, we note at paragraph 7.14 Council’s indication that it is **unlikely that new lands will be zoned for additional housing** beyond those currently identified. In forming this position we are unaware of any assessment undertaken to determine whether zoned sites and/or windfall sites are suitable, available or viable for residential development. Details contained within the appendices to Evidence Paper 6 (Housing) quantifies the *potential level* of available housing from windfall, but there is no assessment of constraints or site specific issues which may impact on the delivery of these sites. In the absence of an urban capacity analysis which rigorously assesses the potential of each site to make a meaningful contribution to housing within the borough Council area, we respectfully urge Council to maintain an open mind. The question as to whether new lands are required can only be fully answered having completed a robust urban capacity analysis of identified sites (zoned and windfall) and consideration given to infrastructure constraints.

Recommendation

- 6.16 Taking account of the desirability of extending the Plan Period to 2035 to meet guidance, get best value from the LDP process and better achieve both the direction of the RDS and the plan’s own objectives, it is important that when reviewing the effectiveness and delivery of its housing land supply, the potential of sites which can be brought forward quickly is recognised by the Council. In this context, the following Chapter provides details of the Toland lands at Dunadry.

7. Site Specific Considerations

- 7.1 In the context of the strategic representations set out above, the LDP might, in future, consider the suitability of the Toland lands adjacent to Old Mill and Shaneoguestown Road, Dunadry.
- 7.2 The site comprises undeveloped agricultural land and sits adjacent to the south western edge of the settlement limit of Dunadry, as designated in the Antrim Area Plan. The approximate site boundary is shown below.



Antrim Area Plan 1984-2001 (Alteration No. 1991 – Limits of Development for Hamlets)

- 7.3 Following the adoption of the Antrim Area Plan 1984-2001 in June 1989 and in accordance with regional planning policy, the Department decided to prepare statutory limits of development for hamlets in the Antrim Borough Council area.
- 7.4 A Public Inquiry was subsequently held by the Planning Appeals Commission (PAC) to consider objections to the Alteration. Objections received relating to Dunadry were considered by the PAC and their recommendations subsequently published.
- 7.5 In respect to Dunadry, objections were submitted seeking the inclusion of additional land inside the development limit to effectively join up the existing 2 clusters of development.

- 7.6 The Commissioner considered the desirability of growth in Dunadry and agreed with the Department that 2 existing clusters should not be joined up, and that only **modest growth** *[our emphasis]* be allowed in this hamlet.
- 7.7 He did however accept that the area around the Old Mill should be included within the development limit as he found nothing to distinguish the works from other built development to the east which was within the limit. As a consequence of this recommendation he also advised the Department that a small area of land to the immediate west of the Old Mill should also be included inside the limit of development.
- 7.8 The Department accepted the recommendations and amended the Dunadry Hamlet Plan accordingly.
- 7.9 The Antrim Area Plan itself identifies Dunadry as a 'Hamlet'. As the 4th tier of settlement within the borough, only modest growth in terms of small groups of houses or individual dwellings which round off, infill or consolidate the existing settlement form will be allowed. This is consistent with the desirability of preserving the character and scale of the hamlets as they currently exist.

Planning History

- 7.10 An outline planning application was submitted for the subject lands in November 2004 for residential development (planning ref. T/2004/1310/O). The application was subsequently refused in May 2005 as it was considered by the Department to be contrary to policy given the proposal was located within the Greenbelt and outside the development limits of Dunadry.

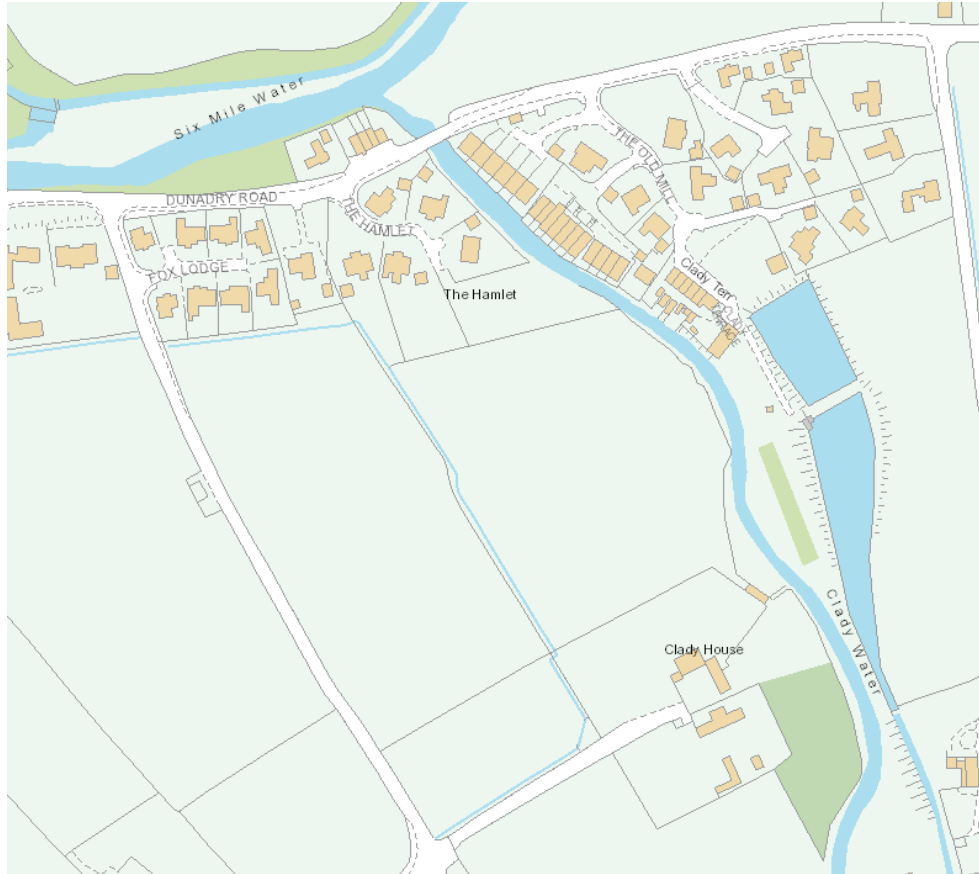
Site Constraints

Historic Context

- 7.11 On review of the Historic Environment Division Map Viewer facility, a number of historic features are located in the wider area of the subject site;
- Grade B1 Listed Clady House (ref. HB20/13/013) - located c. 120m south;
 - Grade B1 Listed Clady Cottage (ref. HB20/12/012) - located c. 245m south east; and
 - Scheduled Rath (ref. ANT 050:068) – located c. 310m south west.

Drainage and Flood Risk

- 7.12 A small watercourse runs along part of the northern edge of the site before intersecting through the centre of the site. The Clady Water also runs along the eastern boundary of the site. These watercourses are shown in Figure 2.2 below;



SpatialNI Mapping (indicating extent of watercourses in vicinity of the site)

- 7.13 The NI Flood Maps indicate no fluvial or coastal flood plain within the site. There is marginal surface flooding estimated through a small portion to the western edge of the site.
- 7.14 There is no history of flooding and it is not in the inundation zone of a reservoir.
- 7.15 It is likely any proposed development on the site will require a proportion of the land adjacent to these watercourses to be set aside as buffers.

Contaminated Land

- 7.16 The site is undeveloped agricultural land. We do not envision there to be any contamination issues which would preclude development of this land for housing.

Ecology

- 7.17 We do not envision there to be any ecological issues which could not be resolved or mitigated through the development management process.

Design Considerations

- 7.18 The potential constraints have been considered and the proposed design response set out below.

- 7.19 Any proposed residential development would be carefully sited and orientated in such a way that it does not negatively impact on the amenity of the existing adjacent residential developments.
- 7.20 The development can be appropriately screened through landscaping to provide a 'rounding off' to the settlement limit along the rural edges, which will not negatively impact on the views to and from the listed buildings within the wider area.
- 7.21 It is likely any proposed development on the site will require a proportion of the land adjacent to the existing watercourses to be set aside as buffers. We did not envision this to be a constraint which would restrict development – the buffers could be landscaped in such a way as to provide features through and adjacent to the site, providing an attractive outlook to any proposed dwellings, for example, provision of a wildflower meadow – which would assist in enhancing biodiversity.
- 7.22 Consideration should be given to the density of the adjacent developments at Fox Lodge, The Courtyard and Old Mill.
- 7.23 Provision of detached and semi-detached homes finished in high quality brick would be considered most appropriate and compliment the character of the area (which is predominantly detached and semi-detached homes in red brick).
- 7.24 A number of access points are options are possible. For example, via the Shaneouguestown Road or through the existing residential development at The Courtyard.
- 7.25 We do not envision any access issues which would prevent the site from being developed and this would be designed and agreed with both the Council and DfI Roads through the development management process.

Principle of Development

- 7.26 Whilst the subject site is not currently included within the settlement limit, if zoned, it could provide a modest level of housing growth which would not be considered overdevelopment and which seeks to sustain a level of growth in Dunadry, proportionate to its proposed reclassification as a 'village'.
- 7.27 Inclusion of this site within the settlement limit would provide both a high quality housing development which is deliverable in the short to medium term.
- 7.28 The site would also provide an extensive area of public open space and attractive setting which is consistent with Part 1, Section 1 of the Planning Act (Northern Ireland) 2011 to;

'secure the orderly and consistent development of land whilst furthering health and wellbeing.'

8. Conclusions

- 8.1 The Draft Plan Strategy places a clear focus on the *'importance of **sustaining our Borough's rural community** and seeks to allow **appropriate growth** in our smaller settlements and the countryside.'*
- 8.2 The Spatial Growth Strategy aims to;

*'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.'*
- 8.3 In allocating a very low level of growth to Dunadry, as presently drafted, the plan is internally inconsistent insofar as the housing allocation to Dunadry will not help the plan achieve its own strategic objective. A modest increase in the allocation would address the inconsistency.
- 8.4 Over reliance has likely been placed on committed housing in the settlement (24 units), which we question the deliverability of - given there have been no housing completions in the Village in the past 4 years.
- 8.5 Dunadry has close links to Antrim as well as Templepatrick, both of which provide further service provisions and employment opportunities such as the Antrim Area Hospital, Junction One, Belfast International Airport, the Hilton Hotel & Golf Course and Antrim & Newtownabbey Borough Council offices.
- 8.6 Consideration should be given to providing a higher allocation of growth which is proportionate to the size and status of the Village, its sustainable location and the supporting roles of nearby Antrim and Templepatrick.
- 8.7 In extending the settlement limit in future to include the subject lands, further high quality family homes can be provided which are deliverable in the short to medium term, located in an attractive setting and will not detrimentally impact the character of the area.
- 8.8 These homes will help sustain and maintain the village of Dunadry and we would respectfully request these lands are considered and included within the settlement limit in future.

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