

BY EMAIL AND REGISTERED POST

19th September 2019

Our Ref: cc1903cd

Planning Office
Antrim & Newtownabbey Borough Council
Newtownabbey
Co Antrim
BT36 5QA

Dear Sir/Madam

**Re: Antrim and Newtownabbey Council Local Development Plan (LDP)
Response to the Draft Plan Strategy for lands located at the Taylorstown Road, Moneyglass.**

I refer to our previous submission to Antrim and Newtownabbey Council's Preferred Options Paper from Strategic Planning dated the 12th April 2017, in relation to Taylorstown Road, Moneyglass (copy enclosed).

This letter relates to the publication of the Antrim and Newtownabbey Borough Council Draft Plan Strategy which was launched by the Council on the 28th June 2019. On behalf of Conway Group, we wish to formally respond to specific strategies that the Council have identified and in addition to this, draw your attention to specific lands that we have identified as being suitable for the inclusion within the settlement limits of Moneyglass.

Homes (Chapter 7)

Stage 1- Housing Growth and Allocation

Antrim and Newtownabbey's draft plan strategy for the total housing growth estimates a growth of 9,750 new housing units will be required for the period 2015 to 2030 across the Borough. This total growth estimate is considerably lower than the preferred option in the Preferred Options Paper (POP) which had stated a growth of 13,000 dwellings was required. We believe that this current growth rate will not meet the housing needs in the Council district.

Strategic Policy 1 proposes an additional 13 hamlets from the POP bringing the total number of hamlets in the Borough to 29. Within Strategic Policy 4, there is a growth allocation of 150 dwellings that is to be shared between 29 hamlets (figures exclude 5 year supply). This would mean a proposed growth of 5 dwellings per hamlet, if spread equally across the hamlets from 2015- 2030. The Plan Strategy has an increased amount of hamlets but less of a housing growth compared to the options set out in the POP. The POP had allocated a total of 345 dwellings for hamlets in the plan period 2015-2030 however, the allocation in the draft strategy is less than half of what was proposed in the POP. This will result in a significant shortfall of dwellings within the hamlets.

The Plan Strategy states that it is not seeking to change the population status of these smaller settlements to an unsustainable level, but to maintain them and give limited sustainable growth to these settlements while protecting the countryside. However these figures suggest that the housing growth will in fact be limited with only an allocation of approximately 5 dwellings per hamlet from 2015-2030, this will make it difficult for hamlets to maintain their population. This allocation is likely to alter smaller settlements as many first time buyers from these hamlets will have no option but to move away from their local community, friends and family and go to larger towns where there is more substantial housing growth allocations.

The plan states that it is important to note that these figures are 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. Nonetheless it is affectively a target and one which should not be dramatically exceeded, therefore limiting how much additional growth these hamlets may be allowed.

An additional housing growth allocation is clearly necessary due to the ambitious economic growth plans of the neighbouring council area of Belfast. Belfast City Councils Draft Plan Strategy seeks to create a further 46,000 jobs over the period 2020-2035, in line with city's objective to enable it to compete with similar cities elsewhere in the UK in terms of attracting investment, creating jobs and driving the regional economy (Policy 8.1, Belfast City Council Draft Plan Strategy, September 2018 pg 144).

Many settlements within the Antrim and Newtownabbey Council area act as commuter towns for Belfast and it is inevitable that there will be knock-on effects upon Antrim and Newtownabbey settlements due to the ambitious growth plans of Belfast. It is therefore necessary to increase the



number of dwellings allocated in these settlements for the Antrim and Newtownabbey Council area to account for Belfast's planned economic growth.

Such an approach is also necessary and in line with statutory requirements under Section 3 (4) and 3 (5) of The Planning Act 2011, which requires Councils to consider how the plans of neighbouring districts may affect the Councils own plans. It is also consistent with the Regional Development Strategy (RDS) which aims to "strengthen Belfast as the regional economic driver" and identifies that "Belfast drives much of the economic and shares its wealth across the region" (section 2.10). This is echoed in paragraph 6.80 of the Strategic Planning Policy Statement (SPPS). Therefore it is evident that the housing growth figure for the Antrim and Newtownabbey Council Area should be increased to cope with this growth.

Meeting the Growth Allocation within Moneyglass

While there is no specific housing growth figure for Hamlets, if we are to assume the allocation will be equally divided this would mean Moneyglass would be allocated approximately 5 dwellings for the plan period 2015- 20230, which is a clear short fall in the amount of dwellings required for the hamlet.

Moneyglass is well positioned in relation to Antrim, Ballymena, Magherafelt and Randalstown and the recent upgrade of the A6 to a high quality dual carriageway, will provide improved transport links to the M2 and Belfast. Therefore due to this location, there will be a much higher demand for housing within Moneyglass.

An analysis of the lands currently available within Moneyglass has been undertaken and only one vacant housing site has been identified that could accommodate future housing growth. Planning permission has already been granted for 13 dwellings on this site (approval ref: T/2012/0178/F). This planning permission has been enacted but cannot be considered as certain, as there is no intention to develop the land in the short-medium term. This therefore leaves no remaining sites within the current settlement limit. In order to ensure a sustainable level of growth, adequate sites for housing must be provided in Moneyglass.

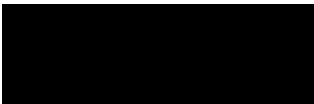
To this end, we draw your attention to the lands located to the north and east of Moneyglass along the Taylorstown Road that directly adjoins the current settlement limit (See attached Location Map). As such, they are particularly well suited to accommodate growth of the current settlement for the following reasons:



- They directly adjoin the existing settlement limit of Moneyglass;
- There are no environmental and physical designations impacting the site;
- The lands form a natural expansion along the north-eastern edge of the village, taking into account that the lands to the south of Roguery Road are within the development limit and the GAA playing fields are included inside the development limit;
- The undulating nature of the surrounding lands ensures that any development will not be prominent in the landscape with views into the site contained along the Roguery Road and Taylorstown Road.

We therefore would respectfully request that the inclusion of these lands is considered during the forthcoming stages of Local Development Plan preparation. Finally we look forward to receiving an acknowledgment of receipt of this submission and engaging further with the Council as the LDP progresses.

Yours Sincerely



Clare Cuskeran

Conway Group

12th April 2017

Our Ref: C03425



Planning Section
Antrim & Newtownabbey Borough Council,
Mossley Mill
Newtownabbey,
BT36 5QA

Dear Sir/Madam,

Re: Antrim and Newtownabbey Council Local Development Plan – Response to the Preferred Options Paper for lands located along to Taylorstown Road, Moneyglass.

This letter is submitted on behalf of our client Conway Group and relates to the publication of the Antrim & Newtownabbey Borough Council (POP) which was launched by the Council on the 18th January 2017. On behalf of our client, we wish to formally respond to specific preferred options that the Council have identified and in addition to this draw your attention to specific lands that we have identified as being suitable for inclusion within the settlement development limits of Moneyglass.

Housing Allocation and Distribution (Chapter 5)

Stage 1 – Determining the Amount of Housing Growth

Antrim and Newtownabbey's preferred option for the total housing growth for the Council area during the next Local Development Plan period, Option 4, is derived from an average of the HGI rate of 554 dwellings per annum and the pre-crash build rate of 748 dwellings per annum, predicting an assumed annual average build rate of 650 dwellings, a total of 13,000 dwellings (including additional 5 year supply).

Option 3, with an overall growth figure of 14,960, is however considered more appropriate to accommodate housing growth within the borough between 2015 – 2030 and should therefore be the preferred option. Like Option 4, it is higher than the most recent Housing Growth Indicator (HGI) figure for the council area indicated in regional guidance. It is however based on the pre-recession build-out rates and therefore gives a higher allocation which provides for greater flexibility in the plan than the current preferred option, Option 4, would otherwise allow.

This additional allocation is necessary due to the ambitious economic growth plans of the neighbouring council area of Belfast which seeks to create a further 46,000 jobs over the period 2020-2035, in line with the city's objective to enable it to compete with similar cities elsewhere in the UK in terms of attracting investment, creating jobs and driving the regional economy (Policy GR1, Belfast City Council Preferred Options Paper, January 2017, p19-22).

The overall result is an increase by 15% on the Growth Allocation given to each settlement (column 1). This in turn results in a change in the Balance of Allocation and Supply column (column 4). Finally, as each settlement is receiving a 15% greater allocation, the Growth Rates in column 1 are increased marginally to account for the increase Growth Allocation as well as the growth percentage rates set out in column 6.

Meeting the Growth Allocation within Moneyglass.

While there is no specific Housing Growth figure for hamlets such as Moneyglass, based on our preferred option (option 3) the growth allocation to hamlets has increased by 45 dwellings to an allocation of 345 for the plan period 2015 – 2030, of which Moneyglass will share a percentage thereof. Overall, there will be a shortfall of 71 units across all hamlets.

Moneyglass is well positioned in relation to Antrim, Ballymena and Randalstown and the proposed upgrade of the A6 to a dual carriageway, which is due to begin construction in 2017, will provide improved transport links to the M2 and Belfast, therefore due to this location, there will be a high demand for housing within Moneyglass.

An analysis of the lands currently available within Moneyglass has been undertaken and only one vacant site has been identified that could accommodate future growth. Planning permission has already been granted for 13 dwellings on this site (approval ref.T/2012/0178/F) and while it has not yet been implemented, the site can be considered as committed, therefore leaving no remaining sites within the current settlement limit. In order to ensure a sustainable level of growth, adequate sites for housing must be provided in Moneyglass.

To this end, we draw your attention to our clients lands, located to the north and east of Moneyglass along the Taylorstown Road that directly adjoin the current settlement limit. As such, they are particularly well suited to accommodate growth of the current settlement for the following reasons:

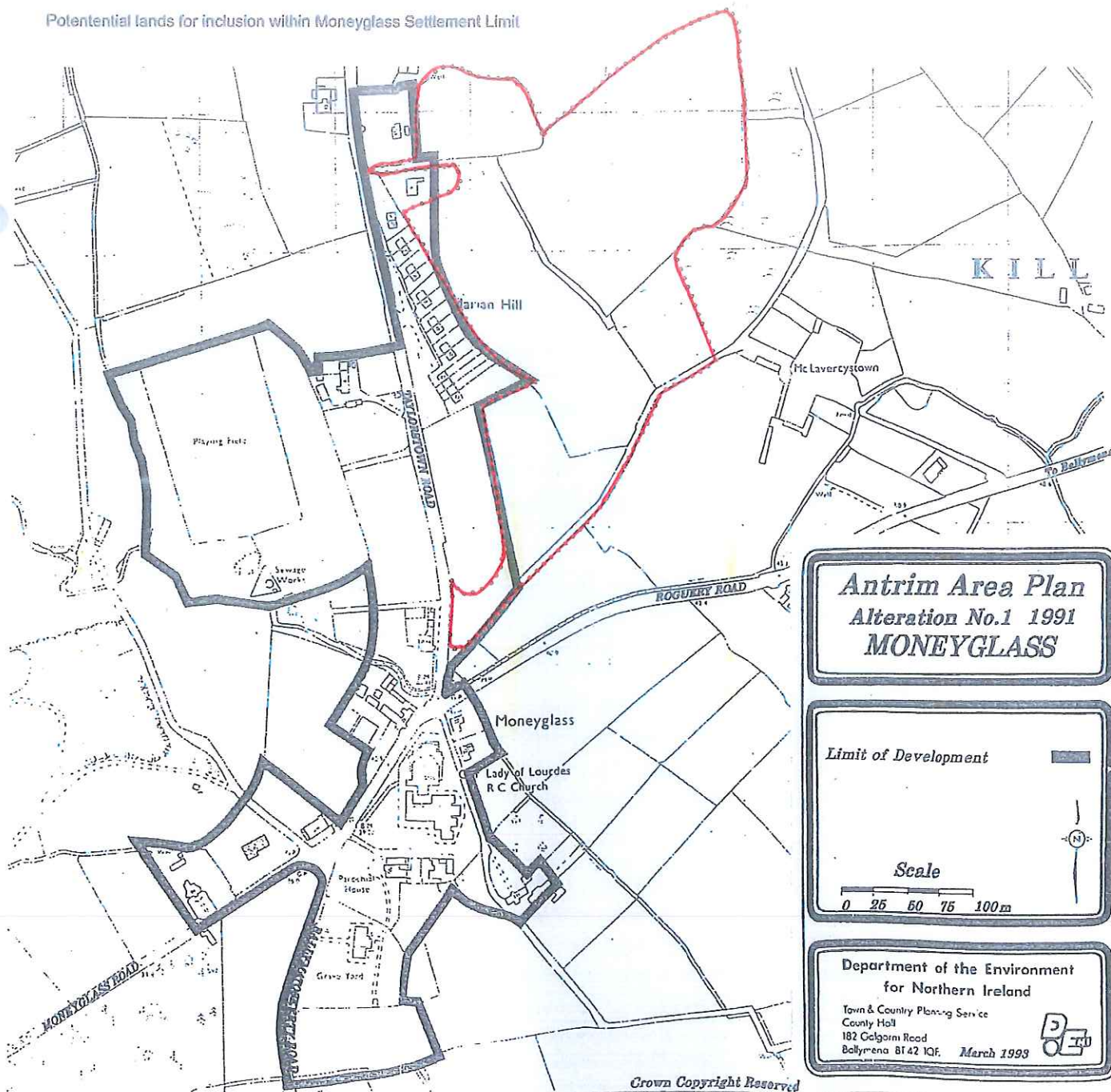
- They directly adjoin the existing settlement limit of Moneyglass;
- There are no environmental and physical designations impacting the site;
- The site is in close proximity to key transport routes to Belfast, Antrim and Ballymena;
- The lands form a natural expansion along the north-eastern edge of the village, taking into account that the lands to the south of Roguery Road are within the development limit and the GAA playing fields are included inside the development limit;
- The undulating nature of the surrounding lands ensures that any development will not be prominent in the landscape with views into the site contained along the Roguery and Taylorstown Roads.

We therefore would respectfully request that the inclusion of these lands is considered during the forthcoming stages of Local Development Plan preparation. Finally we look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as the LDP progresses.

Appendix 1

Potential Sites for inclusion within the new settlement limit of Moneyglass

Potential lands for inclusion within Moneyglass Settlement Limit



Antrim Area Plan **Alteration No.1 1991** **MONEYGLASS**

Limit of Development



Scale

0 25 50 75 100m



Department of the Environment
for Northern Ireland

Town & Country Planning Service
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March 1993

