

TC TOWN PLANNING
Town & Country Planning Consultants

DEVELOPMENT PLAN TEAM
Mid & East Antrim Borough Council
Planning Office
County Hall
182 Galgorm Road
Ballymena
BT42 1QF

11th December 2019

OUR REF: G/054/19

Dear Sir/Madam,

Re: Representation for [REDACTED] for Land to the North and North East of No. 20 Carnhill Manor, Largy Road, Carnlough, Co. Antrim.

This submission, accompanying map and Response Form have been prepared on behalf of [REDACTED]

It is acknowledged that the Draft Plan Strategy (dPS) for the Local Development Plan 2030 for Mid and East Antrim Borough Council consultation process deals with the spatial and regional policies to be applied to the borough when the new Local Development Plan (LDP) is adopted. However, the following and appended map identify land that should be considered for the next stage of the plan process as this will enable implementation of the proposed strategic policies formulated for the dPS and is therefore material.

The following paragraphs refer to relevant sections of the accompanying dPS Response Form.

Section K – Sound

With respect to the Spatial Growth Strategy & Strategic Housing Allocation Strategy, elements of the dPS would appear to be 'Sound'.

In recognition of the 83 number of units allotted to Carnlough, as set out in Table 5.4 – Strategic Allocation of Housing to Settlements 2018-2030 to SGS3, the justification included in paragraph 5.3.31 of SGS 5 would enable this target to be met. However, it should be noted that Table 5.4 does not cap the number of new dwellings and that this should be monitored and managed where demand and need emerges throughout the plan period.

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Paragraph 5.3.31 of the dPS does allow for flexibility to be applied at the Local Policies Plan Stage with regards to amendments to the settlement limits for Villages and Small Settlement. However, it does not provide indicators of how this will be reviewed.

The following suggestions (not exhaustive) could form indicators to be considered when examining the existing limits so that the full potential of SGS3 & SGS 5 is met:

- Due to the length of time the extant area plans have been in the public domain, land included within the existing settlement limits that has not been developed throughout the extant period or has no committed planning permission attached may be considered for exclusion in lieu of lands that would become readily available for development;
- New material considerations have arisen during the extant plan period that were not available before e.g. land within the development limits is now susceptible to flooding;
- Land adjoining the settlement limits could be easily integrated into the landscape;
- The provision of infrastructure and utilities would merge seamlessly with features in-situ etc.

A number of parcels of land within the village of Carnlough have remained idle throughout the lifetime of the extant area plan and these could be substituted for land where it is visible the landowner would release them for development. The Strategic Flood Map (NI) identify areas susceptible to flooding and those within the flood plain. This information may not have been available before and may now restrict and influence the development potential for the village.

The accompanying map identifies land outlined in red that could easily be integrated into the development limits for Carnlough through the plan process; no hazards or constraints were identified for this land. Carnhill Manor was developed by [REDACTED] who also owns property No. 20. A submission was made on behalf of [REDACTED] for the attached land during the Larne Area Plan Review in 2002 – a copy of this representation is included for your information which reinforces [REDACTED] intent to develop the land.

No. 20 Carnhill Manor has been retained by [REDACTED] as a measure of safeguarding access to the lands outlined in the accompanying map. This will also enable connectivity and permeability enabling services and infrastructure to be installed as an extension to those in situ. The site would integrate adequately into the surrounding environment due to the low lying ground levels, existing vegetation to be retained and augmented where necessary and set back from the main Largy Road enabling screening from existing road frontage

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development in the interest of draft CS5 – Antrim Coast and Glens Area of Outstanding Natural Beauty.

A further detailed submission will be made at the Local Policies Plan stage regarding the attached land, however in recognition of the strategic policies outlined in the dPS it is important to highlight that there are a number of barriers limiting the development potential of Carnlough. These need to be considered fully at this part of the plan process to ensure a sufficient amount of land can be released for development to meet the necessary housing supply. The indicators suggested herein could form part of the tests applied when reviewing and amending the existing settlement limits for villages and small settlements.

Inclusion of the lands will also support SGS8 – Tourism Strategy and economic aims and objectives for the new plan period.

Section L – Unsound

There would appear to be a conflict between the ‘Preferred Option’ for the Settlement Hierarchy in the Preferred Options Paper and SGS 2 of the dPS as Portglenone is listed as a small town in the former and a village in the latter.

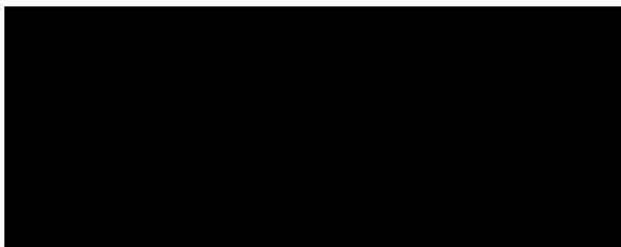
The characteristics, scale and services provided by Portglenone would infer a small town status and not a village especially when compared against the scale, character and services attached to the villages listed in the settlement hierarchy.

Listing Portglenone as a village could undermine the facilities it offers to the rural hinterland and it may also have an implication on the housing quota allotted for each settlement type.

SGS 2 would not be wholly in accordance with procedural tests P2, P4 and CE2 of Section M of the dPS Response Form.

I trust that this submission will be considered accordingly and that the landowner will have the opportunity to make further representation at the appropriate stages in the plan process.

Yours faithfully,



Theresa Cassidy BSc (Hons) MSc (Ecology & Conservation)

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Section B. Your Details

Q1. Are you responding as individual, as an organisation or as an agent acting on behalf of individual, group or organisation? (Required)

Please only tick one

- Individual (Please fill in the remaining questions in the section, then proceed to Section F.)
- Organisation (Please fill in the remaining questions in the section, then proceed to Section D.)
- Agent (Please fill in the remaining questions in the section, then proceed to Section E.)

Q2. What is your name?

Title

MISS

First Name (Required)

THERESA

Last Name (Required)

CASSIDY

Email

info@tctaplanning.co.uk

Q3. Did you respond to the previous Preferred Options Paper?

- Yes
- No
- Unsure

Section C. Individuals

Address Line 1 (Required)

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

Section D. Organisation

If you have selected that you are responding as an organisation, there are a number of details that we are legally required to obtain from you.

If you are responding on behalf of a group or organisation, please complete this section, then proceed to Section F.

Organisation / Group Name **(Required)**

Your Job Title / Position **(Required)**

Organisation / Group Address (if different from above)

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

Section E. Agents

If you have selected that you are responding on behalf of another individual, organisation or group there are a number of details that we are legally required to obtain from you.

Please provide details of the individual, organisation or group that you are representing.

Client Contact Details

Title

First Name (Required)

Last Name (Required)

Address Line 1 (Required)

Line 2

Line 3

Town (Required)

Postcode (Required)

Q4. Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP?

Please only select one.

Agent

Client

Both

Section F. Soundness

The draft Plan Strategy will be examined at Independent Examination in regard to its soundness. Accordingly, your responses should be based on soundness and directed at specific strategic policies or proposals that you consider to be unsound, along with your reasons. The tests of soundness are set out below in Section M.

Those wishing to make representations seeking to change the draft Plan Strategy should clearly state why they consider the document to be **unsound** having regard to the **soundness tests** in Section M. It is very important that when you are submitting your representation that your response reflects the most appropriate soundness test(s) which you believe the draft Plan Strategy fails to meet. There will be no further opportunity to submit information once the consultation period has closed unless the Independent Examiner requests it.

Those who make a representation seeking to change the draft Plan Strategy should also state whether they wish to be heard orally.

Section J. Type of Procedure

Q5. Please indicate if you would like your representation to be dealt with by:

(Required)

Please select one item only

- Written (Choose this procedure to have your representation considered in written form only)
- Oral Hearing (Choose this procedure to present your representation orally at the public hearing)

Unless you specifically request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Section K. Is the draft Plan Strategy Sound?

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

Sound

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

(Required)

PLEASE REFER TO COVER LETTER .

Section L. Unsound

In this section we will be asking you to specify which part(s) of the draft Plan Strategy you consider to be unsound.

Note: If you wish to inform us that more than one part of the draft Plan Strategy is unsound each part should be listed separately. Complete this page in relation to one part of the draft Plan Strategy only.

Q6. If you consider that the draft Plan Strategy is unsound and does not meet one or more of the tests of soundness below, you must indicate which test(s) you consider it does not meet, having regard to Development Plan Practice Note 6 available at:

https://www.planningni.gov.uk/index/news/dfi_planning_news/news_releases_2015_onwards/development_plan_practice_note_06_soundness_version_2_may_2017.pdf

Please note if you do not identify a test(s) your comments may not be considered by the Independent Examiner.

Continued on next page.

PLEASE REFER TO COVER LETTER .

Section M. Tests of Soundness (Required)

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?

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.

Section N. Which part(s) of the draft Plan Strategy are you commenting on?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to inform us that you consider more than one part of the draft Plan Strategy is unsound, you can submit further representations by completing and submitting additional copies of this section.

Relevant Policy number(s)

PLEASE REFER TO COVER LETTER

(and/or)

Relevant Paragraph number(s)

(and/or)

District Proposals Map



15th August 2002

Divisional Planning Office,
County Hall,
182 Galgorm Road,
Ballymena,
BT42 1QF

Dear Sirs,

LARNE AREA PLAN REVIEW

In relation to the above Review, please find enclosed a Site Location Map outlining land which, on behalf of my client, I would request be included within the new development boundary of Carnlough.

The subject site is adjacent to a recent successful housing development off the Largy Road, which offered a range of detached and semi detached houses much needed by this growing community and which lies just north of the NIHE Croft Road estate and another site which is currently being developed.

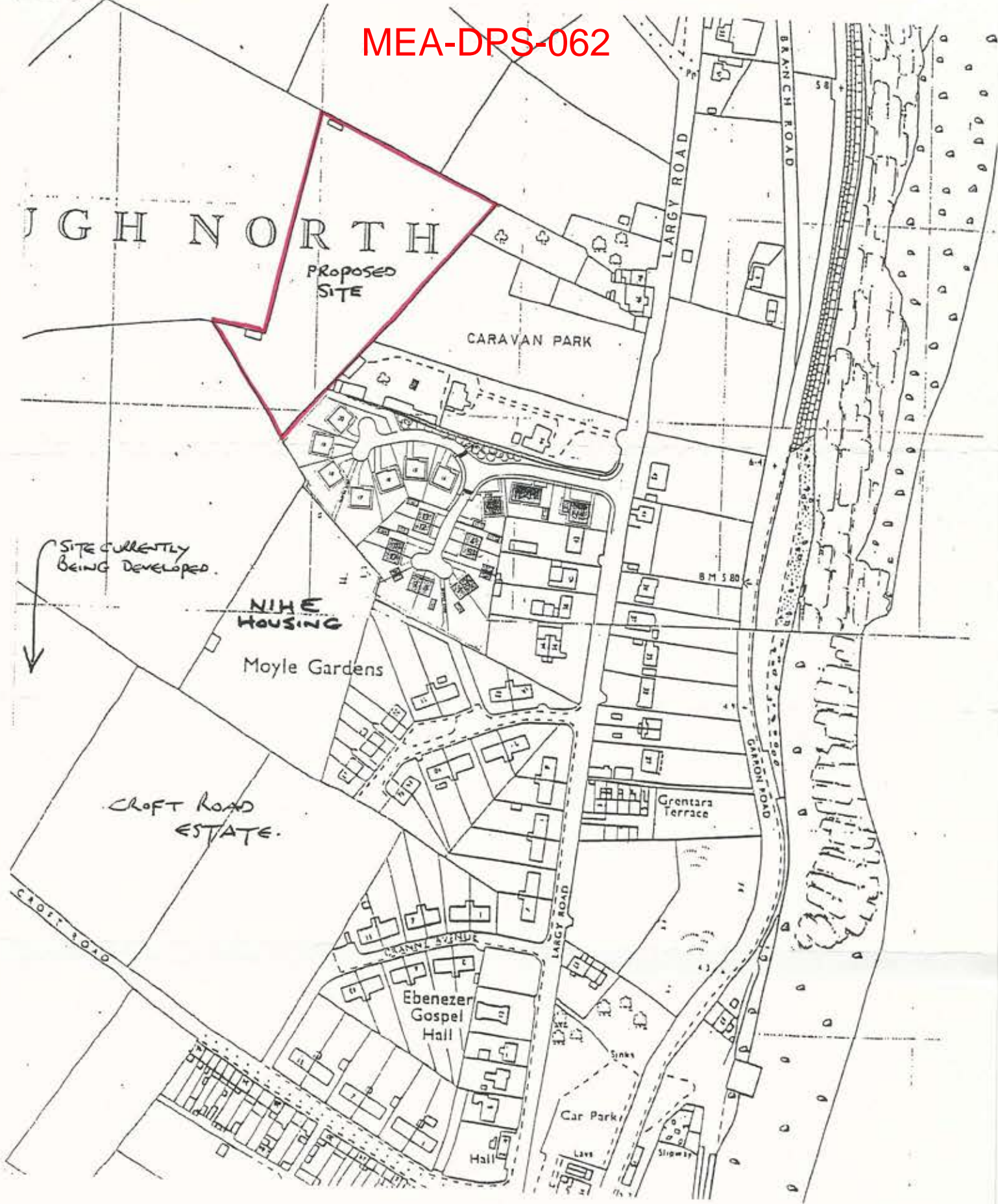
The site is well off the Largy Road, set into a slight hollow and tucked under the surrounding hills. It would be masked by current buildings and would allow an increase in the housing stock of Carnlough with very little impact on the vistas.

I would ask the Department to consider the inclusion of the Site as suitable for housing in the new plan,

Yours sincerely,



Thomas Wilson



LARNE AREA PLAN REVIEW

SITE ADJACENT TO CARNHILL MANOR, LARGY ROAD, CARNLOUGH

SITE LOCATION MAP

SCALE 1:2500

AUGUST 2002

Dr. No.01