

**Antrim and Newtownabbey Borough Council**

**Local Development Plan 2030**

**Preferred Options Paper**

**MAG Response**

**12 | 04 | 17**

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**Local Development Plan 2030 Preferred Options Paper**

**Ministerial Advisory Group (MAG) Response**

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**By email to:**

[planning@antrimandnewtownabbey.gov.uk](mailto:planning@antrimandnewtownabbey.gov.uk)

## **1.00 General**

- 1.01 MAG was established in 2007 to advise the then Minister for Culture, Arts and Leisure, and now the Minister for Communities, on the implementation of the Architecture and Built Environment Policy.
- 1.02 MAG welcomes the opportunity to comment on the Preferred Options Paper of the Antrim and Newtownabbey Borough Council Local Development Plan 2030, and would advise as follows.
- 1.03 The MAG consists of an Interim Chair and 7 Members, all of whom are independent professionals appointed through the public appointments process to advise the Minister for Communities on the implementation of the Policy for Architecture and the Built Environment.
- 1.04 MAG is assisted by 21 Expert Advisors, independent professionals who, while they are not Ministerial appointees, are appointed through the public appointments process.

## **2.00 MAG Response –**

- 2.01 This response has been prepared by three of the MAG's Expert Advisors and is submitted by MAG Secretariat on behalf of MAG.

### **2.02 Key to Text:**

*POP extracts in italics*

MAG observations black

MAG text inserts *blue*

MAG deletions/relocations *grey*

## **3.00 Chapter 2 - Setting the Context - Page 21-28**

### Our Vision

MAG observation: There is enormous scope to enhance the initial *Our Vision* statement so that it becomes truly aspirational, identifying high level desirable outcomes, and creates a context for transformational, beneficial change for all. Well worded, a vision statement with strong ideas that create a future of distinctiveness, connection, quality and

excellence can be inspiring in itself. It is possible to create this future right now, in language, by using really strong ideas. When an inspiring vision meets the needs of all relevant parties, magic happens. We request that this be written in the present tense – a more powerful use of language – because it creates new contexts and possibilities right here and now. When such a created future meets the needs of all relevant parties, people live into the possibility created. Key actions will align behind the possibility as all stakeholders live into that. We request that this be re-worded and offer the following possibilities:

## PLACE

We live and work in distinctive, connected places with strong, characterful identities. Great examples include:

- Randalstown's conservation area with notable terrace, entrance, viaduct, bridges and listed buildings
- Ballyclare's square
- Templepatrick's long estate wall and quality environment including listed buildings
- Smaller villages whose intact character has accommodated evolution - eg Parkgate and Doagh
- Stunning natural landscapes

Neighbourliness and connectivity are key features of our towns, villages, and the countryside

We value and care for our unique natural and built heritage. We request that future LDPs and development proposals reflect that. Many of our places are welcoming, alive, and bustling - but some places and areas are in decline through the evolution of late 20th century business/shopping cultures including large scale out of town / edge of town development (eg Junction One) that have resulted in declining high streets and declining attractiveness of in town shopping centres). Some town core's retail centre of gravity has significantly shifted through major retail insertions (eg supermarket in Ballyclare and Antrim).

As a community we create high quality well designed places that with strong identity - special enough to be the heritage of the future - that are socially cohesive, attractive to people as good places to live, invest and create jobs, and increase public well-being – with help from the high calibre design professionals and planners at work here – and an effective, well run planning system.

We choose to re-use, recycle our materials, and reduce waste, and energy to maximise our sustainable use of resources - protecting our environment and setting the example for future generations.

We request that Council develops a longer term vision, say fifty years - since that is really the length of time it will take to re-make the environments that currently don't serve citizens well. Such a long term vision creates the best possible future for everyone, and changes certain detrimental ways in which we currently work, live, travel, and use our environment - at great cost to our personal and socio-economic wellbeing, and that of our environment (built and natural).

Essential is the creation of concentrations of people, living and working together, in places and buildings of much higher design and place-making quality, using equally well designed infrastructure, facilities, and support services located in urban areas well served by public transport (rail and bus) and major roads. Continuing on with the present overly 'spread it thin' approach will maintain an over reliance on personal car transport and continue to dilute quality of our places and their services. There is a pressing need to take seriously the reality of climate change and its implications for all of us.

### Creating a New Future

We create the future in language today (using words and images). When the future we create meets the needs of all relevant parties, and is effectively and regularly communicated to them, all kinds of people live into that possibility. Unpredictable opportunities arise for their myriad actions using their individual and collective skill sets.

The present tense is a more powerful use of language and experience shows it to be a very effective way of creating a new context for meaningful change. This does mean the statements below may not all be reality now. This is intentional. By stating these as written the Council's LDP creates a new context, one in which these become

possible. We offer the following rephrased versions of the overall vision contained in the Preferred Options Paper draft.

Could the future we are the possibility of creating include the following?

## PEOPLE

Council provides quality services and well designed facilities, easily accessible to everyone

Active, healthy, engaged people access their own power with Council support

Everyone collaborates to dream, design, plan, and celebrate having great services, quality of life and increased prosperity.

Our tolerant culture respects diversity and supports our inclusive communities

We use non-violent communication methods, listen respectfully to each other, accept feedback graciously, and our responses meet real needs.

We serve our customers with excellent high quality, accredited care.

## PROSPERITY

Our entrepreneurial culture gives us cutting edge business advantage.

Leading companies locate here because of our excellent offer of a choice of well designed, safe, walkable socially connected neighbourhoods, supporting an excellent work/life balance.

Our fully integrated, connected, world-class infrastructure connects Northern Ireland to us and us all to the world. So we attract innovative, creative business, inward investment, increasing productivity, exports and thriving companies.

Sustainable job creation is increasing dramatically thanks to our work stimulating local business start-ups, and supporting established companies to upscale.

Our tourist economy is thriving thanks to our authentic natural and built heritage offer, creative arts and culture activities, and great infrastructure connections.

### Infrastructure

2.48 *The Borough occupies a key strategic location with regard to Northern Ireland's transport network, with major road and rail links providing easy access to regional gateways such as Belfast, Larne and Derry/Londonderry. This transport network provides high quality links to the rest of Northern Ireland, the Republic of Ireland, and to the rest of the United Kingdom and mainland Europe. The council has great opportunity to build its local development plan on a major strength – its excellent transport infrastructure. The possibility exists to construct strategic links between the Derry~Londonderry - Belfast regional rail network and Belfast International Airport, specifically constructing a spur rail link from Antrim Station and from Templepatrick to the airport. This would connect Belfast and Derry~Londonderry to an international airport with growth capacity, size of plane and less unlimited landing times compared to Belfast City Airport. This further opens this council region up to the major metropolitan centres in the rest of Northern Ireland, and the world – enhancing its tourism and business growth potential.*

2.54 *The issue of public transport provision [delete: will remain as a key issue] in the Antrim and Newtownabbey area, offers possibility to cater for [delete: especially] those inhabitants who are environmentally aware, elderly, economically and/or socially disadvantaged, and those currently reliant on cars for travel, from all social backgrounds.*

## **4.00 Chapter 3 - Proposed Plan - Vision and Objectives – Page 30-32**

(Our observations on Our Vision p.21 are repeated here)

There is enormous scope to recast the *Local Development Plan Vision* statement so that it becomes place specific, truly aspirational, and creates a context for transformational, beneficial change for all. Well worded, a vision statement with strong ideas that create a future of

distinctiveness, connection, quality and excellence can be inspiring in itself. When an inspiring vision is consistently presented and well communicated to all relevant parties, and is found to meet their needs, magic happens. People, of all kinds, live into the possibility created. We request that this vision statement be written in the present tense – a more powerful use of language – because it creates new contexts and possibilities right here and now. Key actions will align behind the possibility as stakeholders live into that.

We request that this be re-worded and offer the following possibilities.

### Plan Vision

It is 2030.... Antrim and Newtownabbey has an excellent reputation as an attractive, diverse, inter-connected place to live and work. Our people live and work in distinctive places with characterful identities. Great examples include: Antrim Castle and Gardens; Randalstown's conservation area; Ballyclare's Square; Templepatrick's long estate wall with high quality spaces and buildings behind; as well as smaller villages with intact centres such as Parkgate and Doagh.

It is 2030.... we are famous for our tolerance and cultural diversity, neighbourliness is a key feature of our welcoming, bustling towns; and tranquil villages, hamlets and countryside too. We have great community spirit. We love our unique natural and built heritage and look after it well. Flagging spirits are revived by well-designed, beautifully built and repaired places - old and new.

It is 2030.... Our new buildings, innovatively designed to the highest sustainable design codes, are really special – potentially heritage of the future. 'Passive Haus' design standards in socially and culturally mixed new housing means no fuel poverty for their lucky occupants. 21st century streets are places to play for children - of all ages – and everyone loves where they live. All of this is made possible by lots of great clients commissioning high calibre design and appointing skilled, creative conservation professionals, craftsmen and women, engineers and town planners to work here – lead, supported and guided by our effective, well run planning system.

It is 2030.... Our great quality of life offer attracts new residents, businesses, investors, and visitors. We have enough new houses to meet our needs - not too many, not too few. These form 21st century



streets in mixed-use walk-able town centres, where everyone knows everyone. Antrim, our newly incorporated county town, is unrecognisable with its fantastic town centre. Built around, and retaining, key assets like the listed and unlisted heritage still left in 2017 – such as the churches, and Antrim Castle gardens. Antrim brings the best of the past into a new and better future.

It is 2030.... A new rail line spur to Belfast International Airport carries locals from Belfast, Derry~Londonderry, and even Co Donegal, to far away places - and overseas visitors here to explore the rich natural and built heritage of this council region, not to mention the delights of the North Antrim Coast and Glens, the Giant's Causeway UNESCO World Heritage Site, the famous walled city of Derry~Londonderry and Belfast's, too many to mention, attractions.

It is 2030.... Antrim is the movement hub of the north – like Crewe in England. Its transformed rail/air regional interconnectivity, excellent infrastructure links, and superb wellbeing offer really sucks in the entrepreneurs and business moguls, both foreign and local, looking for great places to locate themselves, their families and their workers.

It is 2030.... We have a strong culture of zero waste, re-using and recycling our materials, and our accessible, quality Council services, in well-designed facilities, are really well used by everyone.

It is 2030.... Collaboration is the name of the game here – we dream, design, plan, and celebrate great quality of life, services and sustainable prosperity, together. Our active, healthy, energetic people are up and at it – actively engaged in civic life, and well supported by Council. We are leaders in Northern Ireland on non-violent communication, respectful listening - accepting feedback graciously, responding to real needs with concern and action. Customers receive the best of care thanks to the roll out of World Host 'Train the Trainers' schemes. These make a real difference to the quality of service.

It is 2030.... All this was made possible by the collective inspired leadership demonstrated by Antrim and Newtownabbey Council's decision to create a new and better future, engaging its people in a series of strengths based, possibilities oriented inquiry and co-creative visioning conversations. Building on our strengths past and present, like our excellent transport infrastructure, and built and natural heritage assets, we collaboratively created a new and better future in

language, meeting the needs of everyone. Quite unpredictable actions followed.

It is 2030.... Over time the future we created back in 2017 has become today's reality.

*3.4 Business land and premises are essential to the future economic prosperity and growth of the Borough..... In addition, it is important that those employment/business sites that perform a strategic function are given strong protection from being lost to other development uses.*

MAG observation: it occurs that sourcing such land and accommodation within existing vacant buildings and backlands would maximise sustainable development and resilience in this council region.

*3.5 MAG request: Focus on achieving the desired vibrancy and vitality .....and promote and deliver regeneration opportunities in places where it will make the greatest difference to residential communities and workers alike – in existing town and village centres. We are extremely concerned about the economic decline of the centre of the "county town" of Antrim and urge the Borough to create a new future for it. Immediate steps include creating a vision for its revival and remaking, and short and medium term steps towards that. With good schools, local hospital and excellent leisure faculties Antrim could be an attractive place to live and work and can be revitalised through relocating of government departments into Antrim, a rethink as to what a high street, with fewer banks and building societies, in the internet based shopping world, could and should be - and how the town centre, transport hub, Tesco, and the Castle Grounds and leisure facilities can connect and support each other - for the benefit of all.*

*3.7 MAG Observation: We fully support the plan's identification of 21st century transport and digital connectivity as a pre-requisite to the Borough's future economic success. Building on and improving the connectivity of the region's transport infrastructure strengths, particularly making rail links to the airport offers a strategic road map to*

ratchet up Antrim and Newtownabbey's connectivity to its immediate and wider residential and economic contexts. Achieving this offers additional benefits to support the social, economic and environmental regeneration of several large and smaller towns transforming them into great places to live, work and visit.

*3.8 'The provision of a sufficient supply of land for housing is a core ingredient of the Plan. There is currently an ample supply of land already identified in existing plans....'*

MAG observation: it occurs as important that housing allocation is best located in existing urban places, where it can support existing and growing local economies, and connect to established transport nodes and major routes. Allocating too much land, or too little to housing can affect the property market and value of existing housing stock, negatively. We request a dispassionate review of the amount and location of existing land allocated to housing to ensure allocations are adequate and in the best places. We further request that the focus shifts to seeking quality in new housing over quantity. ie. we request that approvals be made on the basis of design quality (both architecture and site planning), rather than over quantity. For those who have benefitted from high quality housing design of housing the experience is that skilled attention to design, place-making and construction innovation creates high quality new homes, and neighbourhoods that are life enhancing, low initial cost and have low energy requirements too - this helps reduce fuel poverty. We request that the Borough's aspirations ensure much higher quality in housing design and siting footprints, to create a vision of the future, that meets the needs of everyone.

*3.12 The promotion of heat and power generation from renewable and sustainable sources will help to address the effects of climate change and encourage the adaptation to a low carbon economy. The Plan can also help to encourage ways of addressing the impact of climate change by [~~promoting~~] ensuring new development is in areas not impacted upon by flood risk.*

MAG Observation: we support 3.12 with minor amendments.

Plan Objectives (as per the draft POP)

*R To provide an adequate range and quality of land and premises for business and industry.*

*R To protect strategically important business and employment opportunities.*

*R To promote the development and regeneration of our town and commercial centres.*

*R To promote high quality environmentally sustainable design.*

*R To provide a sufficient supply of land for mainstream and affordable housing and ensure a diverse choice of housing.*

*R To ensure that necessary new infrastructure accompanies new development.*

*R To accommodate necessary community facilities.*

*R To encourage better connectivity by transport and digital networks.*

*R To protect and enhance the natural and built environment.*

*R To protect open spaces of public value and promote green network linkages around our larger settlements.*

*R To promote sustainable tourism and economic diversification.*

*R To integrate climate change adaptation requirements such as flood prevention and sustainable renewable energy production.*

*R To make adequate provision for waste management.*

**Q: Do you agree with our Plan, Vision and Objectives?**

MAG Observation:

It occurs the plan, vision and objectives are bland, and lack inspiration. The alternative we offer suggests that strong aspirational ideas that, implemented, would make a real difference to citizens, workers and visitors alike.

The objectives listed above need to overlap with each other – treating them as separate targets is sure to lead to further socio-physical disconnection, by fragmenting further and segregating land-use functions and people. Such a context breaks down communities and undermines neighbourliness. It drives up car journey numbers, and runs counter to this plan's stated commitment to address climate change issues. If these are treated in isolation they undermine and work against the aspirational possibilities and future vision of the Borough.

We see major strengths in the region's transport infrastructure: rail, air and road as solid ground for developing a deliverable strategy that substantially better connects its key facilities to towns and cities within and beyond this region, at a local, regional, national and international level.

Of Belfast's two airports, we understand that Belfast International has less of a time restriction on flight arrivals/departures, longer runways, adjacent development land - offering better growth potential. There is currently no rail connection from anywhere in Northern Ireland to Belfast International Airport.

We request that the following objectives be written into the plan:

1. Support increased public transport connectivity - particularly support the growth of Belfast International by connecting it by rail to the Belfast-Derry~Londonderry rail link (and thence Northern Ireland). Action emerging: Create a rail link spur to the airport (this connects citizens of Belfast and Derry~Londonderry to the airport without need for a car.)

2. Increase public transport connectivity for residents of smaller towns within the region

Action: Add new halts along the railway line to encourage connectivity and support appropriately located new residential and other mixed use development (this increases sustainable connectivity for those living and working in smaller settlements eg: Dunadry; Templepatrick, Ballyrobert etc.) Turn M2 hard shoulder into dedicated bus lane

3. Create possibilities to bring former railway lines back into rail use.

Action: Retain old Antrim-Crumlin –Lisburn route for rail use.

We do not support the use of this as a greenway - as doing so prevents the much more strategic use as a infrastructural transport connector within, into and out of the Borough.

4. Support the strategic growth of Belfast International Airport
5. Locate new business/industry developments in the existing unused and/or under-used spaces, and backlands of existing urban contexts eg. mixed-use town centre and also neighbourhood locations – offering the full range of facilities needed by citizens for well-being and work/life balance.
6. Develop a 'dumb-bells' strategic development concept, consolidating new mixed-use development in the form of walkable, liveable neighbourhoods around existing major infrastructure. Prioritise the consolidation of the 'bells' first ie Antrim and Newtownabbey - and then the linear route / connections / nodes between.

Action: Prioritise re-making Antrim town centre. Build from its existing strengths and assets: Antrim Castle and Gardens, historic churches, other listed buildings, and remaining non-listed heritage still forming historic street contexts and providing some legacy and memory of the towns' historic past.

Action: Create a town centre street typology context for Newtownabbey, comprising traditional grain, 2/3 storey building scale, buildings attached to each other, frontage adhering to the street building line, laid out in blocks; mixed uses (vertically and horizontally) to include: residential; independent retail; commercial; community facilities; leisure; education; industry etc. Demolish Abbey Centre – a very tired, grim mono-use facility.

9. Reduce the need for new build (for business, industry and housing)

Action: map and schedule existing vacant property assets (heritage and non-heritage), assess and cost for re-use.

Where poorly designed and laid out housing, (c.1960s onwards) exists target this for removal and renewal. Manage this in ways that maintain existing communities and their community spirit

10. Create new distinctiveness and identity, especially where strong, attractive local identity already exists.

11. Minimise the uptake of agricultural land for new developments of any kind

12. Reduce priority for the car in all urban settlements. (Note: it occurs there are too many engineered roads all over the borough, particularly in Antrim which has been murdered by the car.)

13. Support residential and other developments designed to such a high quality that their attractiveness and interconnected street networks becomes a contribution to eliminating territoriality and division (both sectarian and the other kinds of division that have emerged because of our affection for: stand-a-lone hedge and wall bound houses; fenced off suburban housing developments; major road networks slicing through once connected historic street networks - and bring this land back into fully integrated shared usage for the benefit of citizens and communities, of all backgrounds.

Additional to the above requested amendments we support in principal the following draft plan objectives with the following amendments:

*To promote the development and regeneration of our town and commercial centres as socially, culturally and economically integrated mixed-use 'street' environments.*

*To ensure [delete: promote] high quality environmentally sustainable design.*

*To provide a sufficient supply of land for mainstream and affordable housing and ensure a diverse choice of housing creating physical contexts that support the growth of connected neighbourhoods.*

*To accommodate necessary community facilities as integrated developments within a wider mixed-use residential context.*

*To encourage better connectivity by transport and digital networks.*

*To protect, care for, and enhance the natural and built environment.*

*To protect open spaces [note: it occurs all open spaces are of public value] [delete: of public value] and develop attractive, usable parkland and linear green routes within, through and between [delete: promote green network linkages around] our [delete: larger] settlements.*

To **develop** sustainable tourism and economic diversification.

To integrate climate change adaptation requirements such as flood prevention, **reduce reliance on fossil fuels and private transport modes**, and foster sustainable renewable energy production **in all building types**.

**Develop and implement a zero waste strategy** to make adequate provision for waste management.

To **minimise uptake of agricultural land and construction of new buildings unnecessarily** [delete: provide an adequate range and quality of land and premises] for business and industry.

To **direct and consolidate** [delete: protect] strategically important business and employment opportunities **into existing underused and/or unused land banks within existing built development**.

To **minimize the need for new infrastructure but, where necessary**, ensure that [delete: necessary] new infrastructure accompanies new development.

## **5.00 Chapter 4 - Proposed Spatial Growth Strategy – Page 34/76**

MAG Observation: This council region is at risk of becoming like Belgium where, not wanting to discourage investment of any sort, one is permitted to build anything anywhere. There is a pressing need in this Borough to halt piecemeal development and low density development of all kinds to stop 'spreading the jam thinly' across the whole sandwich'.

### Spatial Growth Strategy Requests:

Development will follow infrastructure – encourage integrated mixed-use developments (including residential) where this is already strong and sustainable (rail). This will help reduce environmental and financial cost of using of rural land to build new infrastructure (at more cost).



Concentrate and consolidate all industry in Mallusk, with overspill located in underused and unused spaces in Antrim, Newtownabbey, and Ballyclare

Allow Mallusk village to be consolidated as a linear 'town' with the cafes, work-wear retail, banks, restaurant service accommodation as the main street frontage.

Instead of facilitating ongoing endless low-density urban sprawl into limited, finite countryside, we strongly recommend the policy is drafted to ensure the consolidation of existing urban settlements

Particularly grow Antrim as the county town by consolidating within its existing development boundary – see notes on page 15

Develop a strategy of relocating facilities traditionally appropriate to town centres (that were located out of town during the Troubles – like hotels) back in towns, particularly town centres eg. housing, hotels, cafes, schools, independent retail.

Develop the policy so as to allow economic activity to be dissipated into neighbourhoods, helping them to become more mixed use.

Nutts Corner is entirely disconnected vis-à-vis rail links. We do not see this a strategic place growth or a Strategic Employment Location. Added to that many of the low intensity industrial/commercial office buildings are very tired 1960/70s developments with limited construction shelf life. Use their aging as an opportunity to relocate of these uses in town centres. Over time, we recommend this area is returned to the countryside.

Create a rail halt at Templepatrick, let it grow, and extend its historic 'street frontage' as an extension of the short section of its historic village street frontage - and into the large areas of land available behind the ribbon of development.

Building on the distinctive identity of Ballyclare's town centre square, repair and extend its urban town centre context. The existing football ground, off the town square is a very significant opportunity to respond to and address the current asymmetry / shift of balance in the town centre caused by the introduction of the large supermarket and associated car park.

Option 3 - Reclassifying existing settlements within tiers

We agree with Preferred Option 3 with the following amendment:

Create a small town category and potentially insert Templepatrick in this.

#### Potential for new villages

We agree with Option 2 (see caveat request below)

MAG caveat request:

Write, into the plan, an action to create a long term (fifty years) integrated master plan for Mallusk village to guide and manage:

- the creation of a consolidated mixed-use village core,
- higher density street character residential development,
- change/decline in the adjoining industrial lands

It would be helpful if the latter included provision for creating a distinct green zone between the existing village and nearby industry.

See requested amendments to 4.27 below

4.27 It is considered that the Mallusk residential neighbourhood displays the characteristics of a self-contained village community and as a consequence it is considered reasonable for this part of Mallusk to be designated as a village. Although it is acknowledged that part of any future village limit currently [delete: will] sits contiguous to the settlement limit of the larger Metropolitan Newtownabbey area, the plan supports and seeks to create a long term master plan framework for Mallusk to manage unpredictable change within the area and, in time, consolidate the village character, and residential density and ensure that it becomes a discrete entity.

#### Potential for new hamlet designation

Option 2 seems reasonable

#### **Q: Do you agree with this list of potential new hamlets?**

Yes to Creavery, otherwise no. In the main these are barely perceptible building groupings and would not even warrant 'dispersed rural cluster designation'. We refer to our previous comments regarding the need to densify and halt the low density spreading the jam of development so thinly.

It occurs that designating these places as hamlets constitutes rural housing 'by the back door' – MAG is concerned that in a council region with limited true countryside such a designation, added to the plan's projected 750 houses in open countryside, would result in a diminution of countryside and run counter to the plan's commitment to addressing climate change issues. Rural housing drives up car journeys and does little to increase rural 'vibrancy and vitality' when residents whose jobs and schools are out of the area for most of the working week.

Instead of designating hamlets we request that housing be allocated to small towns such as Templepatrick, Randalstown and Mossley.

**Q: Are there any other areas that should be considered as a new hamlet?**

No.

RAF Aldergrove

**Q: What are your views in relation to this site?**

While this site's close proximity to Belfast International Airport offers the possibility for its redevelopment as a bespoke business park with local, national and international possibilities – counter to that is the strategic option to locate such emerging businesses in Antrim town. With a rail spur link to the airport such a strategic decision to locate new business and enterprise in the town would:

- be more sustainable
- support Antrim's revival and re-making as a major town in the region
- reduce the growth of car journeys to yet another rural business/industry destination

We see a possibility to concentrate new business and industry flowing from a growing Belfast International Airport at old Aldergrove. We request that the plan develops bespoke design guidance for such a development and ensure that it is cohesive, integrated and linked to the airport by public transport.

**Q: Do you agree with our proposed classification for our centres – page 50**

No – We do not agree with either Option 1 or Option 2. See notes below.

Classification of Centres

We would expect to see a much broader schedule of uses in a large town and also a town. We request that residential, education, offices, healthcare, sport and leisure, entertainment, hospitality etc. be included in addition to uses already cited.

The term 'district centre' is a throw back to 1960s planning terminology and the days of new towns. It is outdated and we request its removal as a typology throughout this table.

Shopping centres appear to being accorded a status equivalent to a traditional town centre, large or small. These are something else entirely - only one of numerous other building development typologies. Invented in the US they reached our shores in the 1970s/80s. Their mono-use and internalised planning typology is not the same as traditional town centres. Dead when they are closed, they are completely antithetical to urban vibrancy and vitality. Even when they are open they can impact negatively on independent retailers close by. It is foreseeable that they may no longer exist by 2030.

We are requesting the removal of retail shopping centres from this classification table ie. Abbey Centre; Northcott Centre etc.

Glengormley is an amorphous low-density sprawl. It is not a traditional town centre or district centre. We request its removal from this classification, and also the Northcott Centre.

### Local Centre

Our sense is this is akin to a neighbourhood high street. This has much more personality and means something to the public.

We request that this classification be renamed High Street, with the following appropriate roles: residential (particularly living over the shop), shops, offices, post office, bank, cafes, restaurants, pubs, education, churches, recreation and leisure etc.

### Neighbourhood Centre

We request that this be called 'a neighbourhood' - this means something to people. Include residential, educational, shops, cafes, pubs, and community facilities among the roles already cited.

We request the removal of all three so-called Neighbourhood Centres listed:

- Greystone Antrim
- Parkhall Antrim
- Ballycraigy Antrim

We assume that any places not designated in our requested revised categories would not prevent small elements of retail or community support from existing or being created.

### **Q: Do you agree with our Preferred Option for our Hierarchy of Centres?**

No – see above for comments

**Q: Do you agree with our Preferred Option in relation to Mossley West**

We request the designation of Mossley West as a 'town centre' and request that the plan incorporate a key action to prepare an urban design led master plan framework. This should seek to create 21st century inter-connected street typologies accommodating the mix of uses requested previously for town centres. We see the possibility of consolidating urban infrastructure around the 'bones' of rail and surrounding 'tissue'. Road infrastructure incorporating dedicated public bus lanes and cycle routes also offer potential for urban consolidation.

**Q: Are there any areas you think should be identified as a new District Centre?**

The following areas offer possibilities for redevelopment as a 'town centre':

Ballyclare Comrades football ground offers great scope for redevelopment to create a new integrated mixed-use town centre (to include residential uses), based on a street network typology - that also addresses the impact of the supermarket development north of Ballyclare town centre.

**Q: Are there any other areas you think should be considered as a Local Centre?**

With an increasing workforce and greater numbers travelling to and from the airport, a designation of a local centre at old Aldergrove close to, but slightly separate from Belfast International Airport (say 3-5 mins walk for security purposes) seems very appropriate - including an integrated transport hub offering the choice of shuttle train and bus shuttle is an important element to ensure ease of connectivity, and reduce car journeys.

**Q: Do you agree that the commercial area of Mallusk should be identified as a Local Centre?**

We agree with Option 2

Consider the designation of a local centre at Mallusk

Re-work/consolidate the commercial area's cluster of shops and eateries to have a neighbourhood 'High Street' feel – this seems to be what might be meant by local centre (or could mean)?

**Q: Are there any particular villages that would be suitable to have a defined village centre?**

- Merville Garden Village (20th century conservation area)
- Whiteabbey Village

These places are misplaced in the proposed Neighbourhood Centres category and are best relocated into a village category. Merville Garden Village offers a model for creating new villages and neighbourhood centres referred to below.

New Neighbourhood Centres

We support Option 1 ie: Remove Neighbourhood Centres from the hierarchy of centres (because none of the places chosen are neighbourhood centres. It is unclear what intended meaning for these is (in the Planning Authority's eyes) and in the context of a lack of clarity we cannot support Option 2.

That said there is undoubtedly work to be done to identify scope for and create walk-able neighbourhoods with mixed-use services within a ten minutes walk, particularly in places that constitute acres and acres of low density housing linked by un-walkable roads. Walk-able neighbourhoods are essential for everyone but particularly the elderly.



**Q: Do you agree that the areas we have identified should be considered as new local Neighbourhood Centres?**

No

**Q: Are there any other areas that you believe should be considered as a new Neighbourhood Centre?**

No

Out of Centre Shopping Centres

*4.75 Given their location beyond our hierarchy of centres, development proposals at these centres will be assessed on their merits against prevailing policy.*

MAG Observation: this statement is very weak and leaves this council borough wide open for approvals on further consolidating the negative impact these large out of centre shopping developments have had on the region's town centres, and their often independent retail and hospitality businesses. We are requesting that this plan make it abundantly clear that it operates a policy of saying 'Yes' to the development types that best support high quality of life, local economies, and wellbeing of our people ie things we need for our wholeness and wellbeing. It has the confidence to say 'No' to developments that undermine the vibrancy and vitality of our towns, the tranquility of our countryside and the social, economic and environmental wellbeing of our people.

It is widely understood that out of centre shopping developments kill life in town centres. The MAG's reponse is strongly recommending the growth and re-making of several towns including Antrim, Ballyclare and other settlements accessible by rail. This clause runs counter to successfully reviving these towns as integrate, socially mixed places to live, work, visit, and shop.

A line needs to be drawn in the sand on these. Internet shopping is already affecting the large out of town shopping centres. Given that c.50% of Junction 1 is empty and has already had a major negative impact on Antrim town it is clear that an alternative attitude is needed. We appreciate the challenges of resisting anything that seems to offer jobs whether they are short term construction work, or low paid retail/hospitality work but until councils take a stand on this they are at the mercy of so called 'economic development' whose typology is unsustainable, and whose off marketed 'significant' contribution to the local economy is dubious. Approval of such additional development is likely to be terminal for already dying town centres.

We request that this is re-worded to read

*4.75 Given their location beyond our hierarchy of centres, development proposals at these centres will be discouraged.*

*4.76 The Strategic Planning Policy Statement sets out the current operational policy for retailing in Northern Ireland. It advises that a town centre first approach should be adopted for retail and other main town centre uses (which is defined in the SPPS as including cultural and community facilities, leisure, entertainment and other businesses). The SPPS also indicates that a sequential approach should be taken for the identification of retail and main town centres uses in LDPs.*

*4.77 In addition the SPPS advises that LDPs should include a strategy for town centres and retailing and contain appropriate policies and proposals that should promote town centres first for retail and other main town centre uses. This includes appropriate policies that make clear which uses will be permitted in the hierarchy of centres and other locations, and the factors that will be taken into account in making decisions.*

We support 4.76 and 4.77 and request that the range of uses for town centres be broadened to include: residential (mixed tenure + culturally and social mixed); educational; independent retail/hospitality; and repair/reuse built heritage).

Additionally we request that town centre strategies address issues of:

- cultural and physical segregation and division,
- ensure walk-ability is a core element.

The planning authority is the possibility of de-territorialising towns.

*4.79 As well as defining and identifying a hierarchy of centres and bringing forward new planning policy, our new Plan will be required to define the spatial extent of our centres. Our centres should provide for a diverse retail offer and other wide ranging mix of uses including residential terraced streets which reflect local character and meet the deepest needs of citizens. [ delete: circumstances and] As part of the Plan preparation process, we will carry out a number of assessments to inform our future decisions.*

*4.81 The LDP will have the option to identify primary retail cores within our town centres. A primary retail core is an area which is identified in the LDP as the central shopping area and where the loss of shops to other competing uses will be controlled through planning policy. However, in a changing retail environment this may be seen as inflexible in certain locations and could simply result in a high proportion of vacant premises.*

We support a strong primary retail core in town centres and add that it is important to have a diverse mix of uses even in a primary retail core (particularly residential town houses and other typologies including Living Over The Shop) – this helps footfall benefiting retailers and ensures better street vibrancy and vitality during the weekdays, evenings and weekends, and generates walkable neighbourhoods. Allowing for some diversity in the primary retail core allows for vacant shop units to take on other compatible uses eg residential etc.

## Centres

**Q: Do you think the existing central area (town centre) boundary for Antrim and the exiting town centre boundaries for Ballyclare, Crumlin and Randalstown should be retained as is or amended?**

We request that the central area boundaries of Antrim, Crumlin and Randalstown not be extended. These places could easily accommodate twice their current density within the existing boundary.

**Q: Do you think the existing District Centre boundaries for Abbey Centre, Glengormley and Northcott should be retained as is or amended?**

We are requesting that there be no new or expanded shopping centres eg. No Junction 2.

### Opportunity Sites include:

Ballyclare Comrades – redevelopment of this to create a new town centre could impact positively on addressing the lopsided development of the town east of the trunk road.

The Castle Centre in Antrim is ripe for re-development and could become an extension of the high street.

### Other issues that should be taken into consideration:

Diversity in mixed-use development (including residential tenure) is critical in town centres

Create street network infrastructure – this offers built in flexibility and allows buildings to evolve over decades or centuries. Historic towns across the UK demonstrate this aptly.

**Q: Do you think Ballyclare, Crumlin, and Randalstown town centres should have a primary retail core?**

Yes, absolutely and the core needs to be much more diverse in its mix of uses – well beyond retail to include a substantial element of residential.

**Q: Do you think Antrim's existing town core (primary Retail Core) should be retained as is or amended?**

Yes, we think Antrim's existing town core should be retained and re-worked. We are extremely concerned about the economic decline of the centre of the "county town" of Antrim and urge the Borough to take an immediate steps to create a new vision for its re-creation as a proper walkable, 'traditional' mixed use 'high street' town centre off 'traditional footprint' side streets. These would be primarily comprised of well designed residential 21st century terraced housing (designed to state of the art Passive Haus and sustainability codes} laid out on an interconnected street network. In developing this vision set out the short and medium term steps towards this future.

Offering good schools, local hospital and excellent leisure facilities Antrim has every possibility of being an attractive place to live and work. It and can be revitalised through relocating of government departments and non global business into Antrim town centre. In our internet based shopping /banking world (with fewer multi-national shops, banks and building societies) create the possibility of a return to a more mixed use local economy high street including attractive residential offer. Connecting the revitalised town centre, transport hub, Tescos, the Castle Grounds and leisure facilities - particularly for pedestrians - so they support each other - for the benefit of all.

4.86 It is expected that our commercial *town* centres will continue to play an important role in accommodating employment generating development, particularly in the service sector. Their position in this regard has become more significant in recent years as employment has moved off the factor floor and into offices and services. Retaining and creating jobs in our commercial *town* centres will also help support the vitality and viability of these important mixed use locations.

With the addition of 'town' as noted above we support this.

4.87 However, not all employment generating development is suitable within our existing commercial centres. Based on our Plan Objectives it will be essential that existing strategic employment and industrial sites are afforded adequate protection from competing land uses and that, where necessary, new strategic locations are identified for businesses and other economic developments in order that large scale investment can continue to be attracted to and accommodated within our Borough.

We concur that not all employment generating development can be located within our existing commercial industries. Most heavy industry is a thing of the past even larger scale employment development can be inserted into the almost entirely low density development in the main towns/developed areas.

Additionally Mallusk can be further consolidated and/or grown to handle some of this. We do not support the creation of more stand-alone discrete industrial estates.

1. *Prioritise existing un-used, under-used spaces, backlands, and brownfield lands within existing town boundaries.*
2. *Appraise existing large footprint built development within town boundaries for re-use/redevelopment*
3. *Appraise the capacity of lands at Mallusk for additional large scale industry*

### Proposed Plan Objectives relating to employment

- To provide an adequate range and quality of land and premises for business and industry.
- To protect strategically important business and employment opportunities
- *To integrate employment opportunities into existing urban areas*
- *To reduce usage of finite greenfield agriculture land for industry or large scale business/commercial uses in the interests of sustainable care of our environmental assets*

MAG Observation: we request that the items 3 and 4 be included in the objectives.

4.90 In BMAP and the Antrim Area Plan there are approximately 614 hectares of land zoned for employment/ industry purposes in the Borough. Of this total area 366 hectares of land relates to lands currently developed for employment and industry purposes and 248.3 hectares is zoned for future industry/employment use.

4.91 Of the 248.3 hectares of lands for future industry/employment use, 155 hectares remains undeveloped. The majority of the undeveloped areas are located in Metropolitan Newtownabbey and

Ballyclare. This includes 91 hectares at Global Point which was designated as a major employment location in BMAP, 53 hectares off the Antrim Road in Mallusk and a 12 hectare site east of the Hillhead Road, Ballyclare. In comparison, the lands zoned within Antrim are almost at capacity. Further information in relation to employment is set out in our evidence paper "Facilitating Economic Development".

4.93 To facilitate future employment growth, it is considered the new LDP should ensure that a ready supply of economic land for strategic business use and industry is maintained. As part of this process it is considered that there would be merit in identifying those larger strategically located sites in *existing urban developments* in the Borough that can accommodate *large footprint business/commercial development* and should be protected for employment purposes and

*where as a consequence future proposals for alternative uses would be resisted. It is considered that such sites would generally be 10 hectares or greater in size and that these should be defined in the new Plan as Strategic Employment Locations (SEs). These sites once identified should be protected for employment purposes and as a consequence proposals for alternative uses would be resisted.*

See above for requested MAG insertions in blue text. Every town has out of town industrial zones – these could be knit into the actual town using backland, brownfield and gap site re-use. It occurs that there is no need to turn more agricultural farmland into SEs.

The plan does not refer to the employment gain from natural and built heritage assets. It is vital to protect these so ensure a breadth of employment offer.

***Q: Are there any areas of land around Antrim, Ballyclare, Crumlin and Randalstown that could be identified as a potential Strategic Employment Location.***

No – see our observations above.

*4.100 Given there is already a large range of possible SEs in Metropolitan Newtownabbey, several of which remain to be developed, it is anticipated that consideration of new SEs is likely to focus on the settlements of Antrim, Ballyclare, Crumlin and Randalstown.*

*4.101 The proposed SEs to be identified by the LDP will be complemented by a range of smaller non-strategic industrial and business areas that will continue to provide for a wide range of local employment opportunities in other places across the Borough.*

MAG observation: With so many SEs already designated in Metropolitan Newtownabbey we are questioning the intent to create more at Antrim, Ballyclare, Crumlin and Randalstown. We further request that business/industrial proposals are knitted into existing



underused or unused open spaces, backland, gap sites, and brownfield sites within town boundaries.

Belfast International Airport

**Q: Do you agree with our Preferred Option for a Strategic Employment Location to be located at Belfast International Airport along with up-to-date planning policy?**

*Option 4*

*We support the growth of Belfast International Airport and support the creation of an SEL with a global business personality at BIA:*

In the absence of a rail connection to the airport this is likely to result in increased daily car journey, over and above the numbers generated by air travel. The land take needed to park these cars is an unsustainable use of a finite resource.

We favour Antrim as the growth location for business in conjunction with a rail spur link to the airport - this would substantially help support its remaking as the County Town. In the short term the creation of an SEL at BIA could undermine efforts to revitalise Antrim. In the medium term an SEL with global business personality that would benefit directly from immediate proximity to the airport may be appropriate for BIA in conjunction with consideration of the redevelopment of the RAF Aldergrove. We have mentioned elsewhere that a mixed use business park type development could be appropriate, combined with office, conference, meeting, hotel and business development facilities - that could attract national and international business and investment. To help avoid it becoming a drain on surrounding towns like Antrim it is vital that such a development has excellent 21st century rail/bus connections.

## Countryside

### Nutts Corner

MAG observation; we do not support the growth of Nutts Corner. It is not served by sustainable rail transport and generates car journeys. We recognise it is something of an 'institution' and a range of grass roots activities occur there serving the rural community in particular.

We support Option 1 with a qualifying clause: as the very tired c1960s/70s building stock reaches the end of its life, that planning approval for replacement buildings in this location be discouraged. This is to foster a possibility, likely many years hence, that this area might be returned to open countryside.

### Spatial Growth Strategy

- *Focus core growth on the Metropolitan Newtownabbey Area and Major Town/Main Hub of Antrim building upon existing committed development allocations and strengthen their roles as the primary locations for growth and investment in accordance with the Regional Development Strategy.*
- *Consolidate and strengthen the role of the towns of Ballyclare, Crumlin and Randalstown as centres for employment, facilities and services to support the network of surrounding villages and the rural hinterland.*
- *Sustain and maintain the role of our villages as local service centres providing opportunity for housing and employment taking account of the benefits of accessibility to our key transport routes.*
- *Sustain and maintain our countryside through [caring for it as a finite natural heritage resource and limiting](#) accommodation of suitable employment and housing in the rural areas.*
- *Promote sustainable development and strengthen the role of our regional gateways such as Belfast International Airport and [knit](#) [delete: with the development of Strategic]Employment Locations into [existing key urban/development along](#) on our key transport routes.*

MAG requests the insertions in blue above

## **6.00 Chapter 5 – Housing Allocation and Distribution Page 78/96**

It is important not to over allocate land for housing – as we learned from the Republic of Ireland's experiences this distorts the property market. Too much housing development and the market overheats. Too few and prices soar, affecting affordability especially for lower income purchasers.

We favour Option 2 since the 6,015 dwellings provides for a reasonable growth and provides more dwellings than necessary. Paragraph 2.32 cites an anticipated increase in numbers of households of 5,571 between 2012-2030. Option 2 allows for providing 6,015 dwellings during the plan period – more than the estimate needed. It also allows for a 5 year housing land supply of 2,005 dwellings at the end of that period.

### Stage 2 Housing Growth Allocation

5.18 We are very concerned at the statement that the housing land supply at the Plan base date would allow for a borough wide 25% increase of dwellings. This seems wholly excessive given the needs above.

We request that an appraisal is carried out to map vacancy, age, and condition, of the borough's existing housing in all the main urban settlements. The properties mapped should include built residential heritage (ie traditional construction (eg. up to 1960)) and also housing post 1960. Well repaired the former can have unlimited life. Post 1960 construction has a construction life of 50-70 years and is very likely to be replaced in time.

Such a study is intended to identify and assess:

- The percentage of vacant houses available to help meet housing need (particularly residential heritage since this often provides a good context for connected community life).

- Housing of modern construction coming to the end of its construction life and whose replacement, with higher density terraced housing in street networks, could accommodate the additional numbers required.

5.19-5.24 Once this scoping study is complete a re-appraisal should be carried out on land previously zoned for housing to assess whether this is needed at all, or needed in certain locations. The intention would be to release as much previously zoned house land back to agricultural use as possible. The growth allocations to all settlements should be reviewed in the context of these findings and also the criteria outlined below vis-à-vis most sustainable higher capacity transport infrastructure connections.

We consider those settlements with rail and/or motorway (served by good public bus services) or that could easily be provided with such connectivity are acceptable settlements for housing growth:

- Metropolitan Newtownabbey
- Antrim
- Dunadry (subject to a rail link being created)
- Ballyrobert (subject to rail link being created)
- Templepatrick

Otherwise we consider that the present transport infrastructure serving the other settlements listed is insufficient to support increased housing allocations.

*5.25 Housing growth is not allocated to specific hamlets, however an overall housing growth allocation for all the hamlets is based on an estimate of existing housing land supply and a rough estimate of possible windfall sites. This results in an allocation of 300 dwellings for all options.*

We do not support the designation of hamlets and consider this allocation of 300 dwellings to this category to increase rural housing by the back door.

*5.26 Housing growth in the countryside will be managed by the new policy provisions of the LDP as derived from the SPPS. An assumed annual average growth rate of 50 dwellings is considered appropriate based on recent trends. This results in an allocation of 750 dwellings for all options.*

We are requesting that there is no relaxation on the present design planning guidance flowing from PPS 21: Building on Tradition vis-à-vis rural development. While we appreciate the political lobby favouring relaxation of the planning restrictions on rural housing, we are clear that when the choice to live in the countryside is a life style choice and not founded on rural work, or immediate family roots then it is an unsustainable choice. 750 houses over the plan period occurs as a high allocation. We request that this be substantially reduced.

**Q: Do you agree with our preferred allocation of housing growth option, which consolidates the growth planned in Metropolitan Newtownabbey and focuses enhanced growth in selected towns and villages?**

No – see our comments at 5.18, 5.19-5.24, and 5.25, 5.26. We request that the advance appraisal scoping work be completed before informed decisions are made about the relative allocation of housing growth across the borough's urban settlements of scale.

**Q: Do you agree that unimplemented housing zonings in BMAP and the AAP should be carried forward into our new LDP?**

No – this is subject to completion of the appraisals and scoping studies requested in 5.18 and 5.19-5.24. This new LDP is an opportune time to reverse housing zonings that originated during BMAP and that may be found to constitute oversupply in the context of outcomes from our requested study above.

## 7.00 Chapter 6 – Planning Policy – Page 98/134

### Operations for retained operational planning policy

We support Option 3 and request that PPS 6, PPS 21 and its supplementary planning design guidance 'Building on Tradition' be taken forward into the new suite of policies.

MAG: observation...please insert blue text below

### Overarching Primary Principle 2 – Climate Change

6.18 The need to reduce our carbon footprint, our use of private transport, our consumption of fossil fuel, and emissions of greenhouse gases by 30% by 2030. that contribute to climate change and improving air quality will be a key primary principle in shaping our new Local Development Plan. Development proposals that can demonstrate a reduction in greenhouse emissions, our carbon footprint, our use of private transport, and our consumption of fossil fuel, will be supported subject to meeting relevant key site requirements and/or other planning policy.

### Overarching Primary Principle 3 – Quality of Life

6.19 To ensure that the wellbeing of our society and the needs of our most vulnerable are at the forefront of our plan making process, proposals for residential and commercial developments should [delete: demonstrate] create distinctive, connected living and working contexts supporting the growth of true neighbourliness and community, accessibility for all and be designed to factor out crime and antisocial behaviour. They should also be well connected in terms of walkability and designed to encourage social interaction and healthier lifestyles.

### Overarching Primary Principle 4 – Quality of Place

6.20 To ensure our settlements and countryside benefit from [high quality architecture, conservation and urban design](#) in developments that reinforce [distinctive places, connected community life](#) and vibrant [streets](#) places and conserve our built and natural heritage. Development proposals will be required to demonstrate a design, [urban design and/or conservation](#) led approach [depending on the development context](#).

### Overarching Primary Principle 5 – Environment

6.21 To ensure that we maintain and enhance the character and appearance of the countryside and natural environment, including areas of important landscape and biodiversity value. Proposals that demonstrate no detrimental impact on these areas will be supported where they meet key [siting, design guidance](#) requirements/planning policy.

### Facilitating Economic Development

We are a society not an economy. Creating a context for distinctive, connected communities and working neighbourhoods is as important as economic development. A three-way balance needs to be achieved. leave it

As noted above The Borough has to become more discerning about which investment and development to accept and approve. Thinly spread development, "we must do it here" or "allow us or we will go elsewhere" bullying investment is to be resisted.

### Employment and industry

This needs to be consolidated. Space needs to be identified for local entrepreneurial enterprises to develop within towns, and larger more global industries should be located in existing centres such as Mallusk or around Belfast International Airport.

### Tourism

Tourism in the borough is underpinned by key assets - these are heritage and history (reflected in the built heritage environment) and landscape (natural heritage environments). We request that the plan and its Tourism, Shaping our Environment, Natural Environment and Built Heritage policies are cross referenced to ensure the protection, care and enhancement of these finite collective resources.

### Environmental Resources

#### Energy

MAG: observation

An aspirational plan for high design quality, energy efficient new buildings and a serious energy-refurbishment of existing housing, particularly social housing, needs to be developed. Care is to be taken to ensure that specialist conservation professionals are involved when traditional construction is being retro-fitted

#### Waste

MAG: observation...

Local recycling with waste stream separation at source needs to be developed, combined with borough-scale larger centres, as a matter of urgency.



## Retail and Commercial Development

MAG: observation: Consolidate historic high streets as shopping destinations. Create no new centres.

**Q: Are there any other issues in relation to environmental resources and planning that you would like us to consider in our new plan.**

MAG observation: The proliferation of wind generation needs careful consideration by the Borough, Being much more prominent than a solar farm, wind generation should conform to a Borough strategy and not in a piece meal application by application consideration. Actual infrastructure to convey the power to the Grid should be in place ahead of approval, but yet its existence should not guarantee approval.

**Q: Are there any factors you consider we should address in our new retail policy?**

MAG observation: Foster the growth of local, sustainable independents in town centres by discouraging edge of town and out of town retail parks and major shopping centres

## Meeting the Needs of Society

6.50 As part of our policy development, we have reviewed the current operational policy set out in a number of planning policy documents relating to housing including PPS 21 Sustainable Development in the Countryside and PPS 7 Quality Residential Development and its addendums. We have found that the broad thrust and direction of current operational planning policy to be generally acceptable. This is summarised below: Providing for identified housing need; Ensuring a mix of housing types, tenures and size in settlements; and Facilitating appropriate housing in the countryside.

6.51 In terms of housing in the countryside, there are a range of circumstances based on the provisions of the SPPS where housing is

*considered acceptable in principle. These include farm dwellings, replacement dwellings, dwellings in a rural cluster and infill development. The detail of these policies will be tailored to the particular circumstances of our Borough and will seek to protect the countryside from ribbon development and rural [delete: urban] sprawl.*

**Q: Are there any factors you consider we should address in our new housing policy, including housing in the countryside?**

MAG observation: we request that council retain PPS 21 and its associated Building on Tradition supplementary design guidance in full. This is working well and making a difference to the siting, design, scale and form of one-off rural housing. Also retain PPS 6 vis-à-vis residential heritage.

For urban housing, particularly in town centres we request that policy foster and encourage housing in the form of terraced streets. This is more sustainable use of land and, well designed, contributes towards creating a physical context that supports the growth of meaningful community and neighbourliness. Its higher density helps support local independent businesses.

**Q: Are there any factors you consider we should address in our new transport policy?**

Make policy to maximise integrated bus lanes, cycle lanes in all new development and to seek the inclusion of these elements in re-development schemes in all urban areas. Support the creation of bike lanes between towns.

Open Space and Recreation

Make a policy to link/connect new housing to attractive, usable, public pocket park spaces through Section 106 type agreements.

## Community Development and Facilities

Ensure that community facilities are completely integrated into mixed use development integral with housing. Foster new development that is a connected element within streets typologies

## Built Heritage

*6.70 Our Borough has a rich built heritage which forms an important part of the character and appearance of our towns, villages, small settlements and countryside. Built heritage can take many forms including tombs, forts, castles and churches, townhouses, farmhouses, grand and vernacular architecture and parklands. It is important that we recognise and protect these features within our built environment as they contribute to the enhancement of our quality of life, benefit our economy through their regeneration and they help to create unique identities and a sense of place.*

*6.71 The role of the Plan will be to ensure that these assets are protected from inappropriate development. This will be taken forward in the consideration of the zoning of any new land for development and also through planning policy. The Plan will also be able to bring forward protection for areas of character such as areas of townscape character and areas of village character. Other forms of protection will be enacted through central government such as listed buildings.*

**Q: Are there any other issues in relation to Built Heritage that you would like us to consider in our new Plan?**

Make a clear and definite statement valuing and protecting built heritage.

Undertake a local listing process as part of an overall heritage audit. This would include scheduling all listed and unlisted heritage, particularly modest collective group heritage eg, modest terraced streets.

Map pre -1960s heritage vacancy, dereliction, condition, 'at risk', buildings in need of maintenance, and prioritise emergency works necessary to rescue and arrest the decay of 'at risk' buildings.

Remove permitted development rights on removal of original painted timber windows/doors and other features such as fascias, barges and verges; lead and slate or glass dormer cheeks; cast iron rainwater goods; and original plaster (inside and out), both in conservation areas, and areas of townscape character.

This strengthens the Planning Authority's hand in preventing removal of elements of historic buildings that are crucial to their character and authenticity. Enforcing their reinstatement when removal does occur is an important tool to shift cultural attitudes on this.

### Environmental Protection

We remind the Borough of our strong recommendations that current development boundaries are not expanded, but maintained for the life of this new plan. Protecting existing natural landscape and encouraging densification go hand in hand with protecting the environment - increasing the viability of public transport and retaining landscape for future generations.

### Design

We commend the Borough's intention to "*raise the bar in the standard of how new development will look and feel*". A firm and robust application of the design requirements of existing legislation and a zero tolerance of incremental minor infringements (eg signage, window and shopfront design in conservation areas) will be a good start. Any recent and /or major infringements should be robustly enforced by the Borough. We request that permitted development rights be removed in conservation areas. Alignment (with existing street building lines), height and overall massing and bulk, are key and fundamental aspects of any proposal. Accurate visualisations of before and after should be an absolute requirement of every applicant for planning permission on a visible, prominent or public site that will have an impact on the

character and feel of any area - be that within an existing built environment or the countryside. We recommend that The Borough request and avail of design review advice via an interdisciplinary panel. This can be provided by the MAG or Royal Society of Ulster Architects.

***Q: Are there any factors you consider that we should take into account in a new policy for design?***

Design guidance should be aspirational and non-prescriptive to encourage maximum creativity and innovation from designers, be they architects, urban designers or landscape architects, artists etc.

We request that a new design guide be commissioned as supplementary guidance. Its status should be that it can be a material consideration when determining a planning application. It should encourage sensitive contemporary design, even in heritage settings (this is more authentic and can become the heritage of the future. Provide inspiring guidance on:

- Architecture
- Conservation Areas and areas of Townscape and Village Character – emphasise and support 'conservative repair' approaches (rather than inauthentic 'restoration'). Make reference to, and explain, such conservative repair philosophies as that favoured by SPAB - this very much much supports contemporary interventions so that the building's story and evolution can be read easily by future generations. Discourage pastiche everywhere.
- Urban design
- Development in rural contexts not covered by Building on Tradition (assuming this is retained)
- Landscape architecture
- Art in the environment

***Q: Are there any other factors in relation to design you consider the plan should address?***

MAG observation: High quality urban design and place-making to , in accordance with relevant planning policy concept statements and design guidance. The Borough, when commissioning its own projects should lead by example in procurement and delivery of high quality thoughtful design - note: this does not necessarily mean high cost.

Retain PPS21 and its supplementary design guidance 'Building on Tradition: A Sustainable Design Guide for the Northern Ireland' Countryside. This is working well - the design guidance could be further developed to address non-residential development in the countryside, where this is deemed acceptable under PPS21 .

In the context of PPS7 Quality Residential Development, review this to include guidance on residential terraced streets and mixed use (including residential) highstreets.

***Q: Are there any areas in our built environment that you consider the Plan should protect because of its unique or special character?***

We request you emphasise the need for particular care taken in areas already designated as being of special interest - eg Conservation Areas, and remaining countryside

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<b>Alan Jones</b>	<b>MAG Expert Advisor</b>

**12| 04| 17**