PLANNING APPEALS COMMISSION

The Planning (Northern Ireland) Order 1991

Article 7

PUBLIC LOCAL INQUIRY INTO OBJECTIONS TO THE
BELFAST METROPOLITAN AREA PLAN 2015

REPORT ON NEWTOWNABBEY COUNCIL AREA

by

Commissioners E Kinghan, A McCooey, A Speirs & M Jones


Date of Report: 31st January 2012
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APPROACH TO KEY SITE REQUIREMENTS

The purpose of this section is to set out our general approach to the matter of key site requirements attached to zonings. We consider that many of the key site requirements specified in the Plan are not in accordance with the guidance set out in paragraph 39 of PPS1. The guidance states that development plans should set out the main planning requirements. It is clear that this is intended to address such matters as constraints to be overcome and specific issues in relation to the site. They should not read like universal informatives or planning conditions to be attached to every site without any thought as to whether they are actually key to the development of the individual site or not. We shall also address the situation where the matters specified are addressed by regional policy and so the key site requirements are merely duplication.

Acceptable Uses

We consider that there may be cases where the range of acceptable uses should be specified in the form of key site requirements. This would normally relate to employment or mixed use sites. The list of acceptable uses on employment sites that do not have specified uses, however, should be set out in the strategic employment section of the Plan and cross-referenced in each District Volume.

Density

PPS 12 requires minimum density levels to be set for housing sites within urban footprints and other sites as deemed appropriate. Maximum densities may also be specified where required. For this reason we consider that density does not need to be specified in every case. Where density has not been proposed as a key site requirement, it will be for the Department to consider if it is appropriate to include it in the adopted Plan. For the purposes of calculating the estimated yield from objection sites we have worked on the basis of a density of 25dph unless otherwise specified. It will be for the Department to consider individual proposals in accordance with regional policy where no density is specified.

Transport Assessment

Transport assessment is addressed by Policy AMP 6 of PPS3 and requires developers to submit a transport assessment, where appropriate. We therefore consider that there is no need to include this as a key site requirement. Furthermore, many key site requirements in the Plan specify the highway improvements considered necessary. We consider that this may pre-judge the outcome of the transport assessment process. We note that paragraph 4.7 of PPS3 allows for the possibility that necessary infrastructure improvements may not be identified until the planning application stage. The Plan should only specify matters that are known to be a constraint to development i.e. the development could not proceed without certain highway works being undertaken or additional public transport being provided, etc.

We note that key site requirements often indicate that the layout shall provide for cycle and pedestrian links. We consider that this is a requirement of regional policy and should be addressed in the concept plan for the site and the transport assessment.
Similarly the Plan often specifies that an Article 40 agreement may or will be required to ensure that necessary highway improvements and local facilities are provided. There may be other means of achieving such provision. The issue is covered in general terms in GP 5 of PPS13, which states that developers should bear the costs of transport infrastructure necessitated by their development. An Article 40 agreement can be required at application stage should it prove necessary and we do not consider that specific reference to Article 40 agreements is necessary as a key site requirement.

**Landscaping**

Many of the landscaping requirements read as planning conditions. They are certainly not unique or key to the individual site. We consider that the retention of existing vegetation, buffer planting to the settlement limit and maintenance of open watercourses are covered by regional policy in PPS7 and are matters that can be addressed in the concept plan and at the detailed application stage. Guidance is also found in Creating Places and DCAN 8. Landscaping should only be included as a key site requirement in appropriate circumstances where there is a particular issue unique to the site in question.

**Flood Risk**

PPS15 states that development plans will not bring forward sites or zone land that may be susceptible to flooding unless in the most exceptional circumstances (paragraph 6.4). The Plan attaches an almost standard requirement for a flood risk assessment for many zonings. We have several difficulties with this approach: most fundamentally that land at risk should not be zoned. In any case flood risk assessment is required by PPS15 where relevant. We consider that the Department should have assessed whether sites fall within a floodplain as part of the preparation of the Plan. We do not endorse this type of key site requirement and consider that this is a matter addressed by regional policy and guidance in PPS15.

Notwithstanding the Department’s stated approach to objection sites where flooding is an issue, the correct approach is set out in regional policy. A site may be ruled out if it lies totally within the floodplain. If the extent of the floodplain is not known a flood risk assessment is a requirement of regional policy. Drainage assessment is a requirement of Policy FLD 3 in PPS 15 and key site requirements of this nature are a duplication of that policy and are unnecessary.

**Concept Plans**

Planning Policy Statement 7 requires the submission of Design Concept Statements so we shall not impose this key site requirement. We may specify matters to be included in the Concept Statement. There may be instances where we consider that in line with Planning Policy Statement 7 a Concept Master Plan should be required to guide development of the site. We will indicate what matters need to be included in the Master Plans in order to address the complex issues involved given the scale of the site.
Housing

Housing recommendations will identify those sites to be held in the Short Term Land Reserve. Other sites recommended for inclusion in the Plan, including those within development limits, will be required to meet the Housing Growth Indicator and should be incorporated into the adopted Plan to meet needs to 2015.

Social Housing

We have recommended that the Department reviews housing zonings and objection sites recommended for inclusion in order to assess their suitability for social housing. It will be for the Department to impose key site requirements related to social housing on appropriate sites in the adopted Plan.

NOTES

Each volume follows the sequence of the relevant volume of the Plan i.e. objections to the settlement limits, then housing zonings, employment, etc.

Following the Department’s publication of the final version of PPS21, all proposed Green Belt designations in the Plan were withdrawn. We have not therefore considered objections submitted in respect of Green Belt designations or policies.

We have only provided plans identifying sites where a change to the Plan is recommended and clarification is necessary as to the extent of the site.
METROPOLITAN NEWTOWNABBEY

OBJECTIONS TO THE SETTLEMENT LIMIT

General objection to the settlement limit
(Objection 1948)

This objection referred to Designation MNY 01 Metropolitan Development Limit Newtownabbey. It was argued that the proposed allocation of housing land in Newtownabbey District is inadequate. We have considered the strategic issue of housing land availability in Part 1 of our report. In the absence of specific lands being identified for inclusion we are unable to give further consideration to the settlement limit in the context of this particular objection. Other individual objection sites will be considered in the remainder of the report. We recommend no change to the Plan as a result of this objection.

Lands at Old Carrick Road

Objections 2647/1, 3755 and 3781

Site 3755 comprises a number of fields to the east of the Hedgelea housing development, on the southern side of Old Carrick Road. The land falls from north to south and field boundaries are generally defined by a mix of hedges and trees. A water pumping station is located on the road frontage of the site. The objection sought inclusion of the site within the settlement “for development”. The Department considered that the site would be suitable for housing.

Site 3781, as reduced, comprises a strip of agricultural land running along the northern edge of the disused railway line, which is heavily vegetated. The northern boundary of the site cuts through various fields and is undefined along the majority of its length. The site is low-lying relative to the B90. The objection sought zoning of the site as a DOS, mainly residential. The Department considered that this site would also be suitable for housing.

Objection 2647/1, submitted by the Construction Employers Federation, sought retention of the BUAP ‘Whitelands’ within the SDL.

We have already commented that the zoning of Development Opportunity Sites on agricultural land currently outside the SDL, is inappropriate. The settlement limit in the draft Plan is defined by a mix of fences, hedges and trees. The disused railway line to the north of housing zonings MNY 03/18 and MNY 05/16 is a strong visual and physical edge to that part of the current urban area. The proposed new SDL that would result from the inclusion of site 3755 would at present be no stronger in terms of defining the interface between the urban and rural areas. We recognise that new buffer planting could provide a robust SDL, but this would take time to mature. The contrived and currently largely undefined northern boundary of site 3781 would not provide an acceptable SDL in the immediate future. We do not consider that either site offers...
benefits in terms of creation of a new development limit such as to justify its inclusion within the settlement.

Both sites are situated within the proposed RLW designation CE 04 (see Carrickfergus Volume). We accept that housing on these sites would not be prominent relative to the B90. Whilst we acknowledge the substantial east-west extent of the RLW where it abuts Old Carrick Road, development on both sites would encroach into it, significantly reducing the overall quantity of open land separating Greenisland and Newtownabbey. This would be particularly perceptible when seen from the public amenity area around Knockagh Monument, which is well-used as a viewing point. We do not consider that justification exists to continually reduce the RLWs until they have only a nominal role, such as has occurred at various locations. We disagree with the Department’s position in respect of these sites and consider that the integrity of this effective portion of RLW would be compromised by inclusion of either within the settlement. In our opinion, both sites should remain within the wedge.

The status of these lands in a previous plan does not fetter our consideration of the objections in the context of the proposals of BMAP. Our analysis of the allocation of housing land is contained in Part 1 of our report. Whilst we have concluded that an additional allocation to Newtownabbey is appropriate, these particular sites are not required to meet the district’s needs. We recommend no change to the Plan as a result of the objections. Our conclusion is not outweighed by the physical suitability of the sites for development, their sustainable location, or the offer of a proportion of social housing thereon.

**Objection 3470**

This large site comprises of a number of fields and several buildings on the northern side of Old Carrick Road. The land slopes markedly upwards, away from the road, towards the Carrickfergus/Knockagh escarpment. The objection was to the exclusion of the site from the SDL and sought identification of the site as a DOS (unspecified use) and its exclusion from the AOHSV, AO CMD, and Brookmount Glen SLNCI. No reasoning was provided in respect of the objection.

We note that no part of the site lies within the proposed Brookmount Glen SLNCI designation. No argument was put forward to question the justification for the designation in any event. Our conclusions in respect of AOCMDs are set out in Part 1 of our report. DOSs are intended as means to secure urban regeneration and we have already stated elsewhere that, as a matter of principle, they should not be zoned on lands currently outside the SDL. Inclusion of the site within the SDL would result in an elongated protrusion of urban development to the north of the Old Carrick Road, which represents a strong physical and visual limit to the settlement at this location. Development thereon would be unacceptably prominent in the landscape and would represent an excessive northward extension of the urban area. The site is an integral part of the wider AOHSV on the northern side of the B90, which is important to the setting of the Metropolitan area, and its exclusion therefrom would be illogical. We recommend no change to the Plan as a result of the objection.
Objection 3473

The site, as reduced, comprises a large complex of farm buildings on the southern side of Old Carrick Road. The site slopes downwards, away from the road, towards the Belfast – Coleraine Railway line, which defines the site’s southern boundary. The roadside boundary is defined by a row of tall conifers. The objection originally sought inclusion of the site within the SDL, its zoning as a DOS (unspecifed) and its exclusion from the AOHSV, AOCMD, and Brookmount Glen SLNIC. The objector’s subsequent submissions argued for housing development within the DOS zoning and indicated that the objection to the SLNIC was not being pursued.

The Department submitted that housing on the site should not be considered, this matter having been raised subsequent to the original objection. However, it is obvious that DOS zoning would be indicative of the use of the site for some form of development. We concluded in Part 1 of our report that a DOS zoning should specify the use to which the site would be put. In this case, the objector clarified the envisaged land use, albeit after the original objection was submitted. We therefore see no reason to reject the objector’s request for our consideration of a proposed DOS for housing.

Our conclusions on the allocation of housing land are contained in Part 1 of our report, as are our recommendations in respect of AOCMDs. DOSs are intended as means to secure urban regeneration and we have already stated elsewhere that, as a matter of principle, they should not be zoned on lands currently outside the SDL. Inclusion of the site within the SDL would result in an illogical and isolated extension of urban development to the north of the railway line, which represents a strong physical limit to the settlement at present in this location. We recognise the current presence of substantial buildings on the site; however, these are overtly agricultural in nature, and typical of many large farm complexes that are often found in the rural area. We do not accept that the site is located in an urban setting.

The problems with noise and odours emanating from the pig unit do not outweigh our conclusions in respect of urban form; such nuisances must be anticipated where urban/rural interfaces exist and in themselves do not justify inclusion of farms or farm complexes within adjacent settlements. We do not consider that the traffic generated by the farm is in any way excessive. Farm-related traffic is commonplace in rural areas, including those close to settlements or on protected routes. Whilst there would be no impediment, in principle, to the provision of an access to a housing development on the site, we consider that this would be likely to generate considerably more traffic and cause greater disruption on Old Carrick Road; the objector’s arguments in terms of improved safety cannot therefore be accorded determining weight. Slurry storage and transportation, if properly managed, need not result in unacceptable nuisance or a pollution hazard, and the objector’s comments in these regards do not outweigh our conclusions in respect of the site. The lack of profitability in pig rearing or in agriculture, generally, is not a matter that justifies housing, or other urban development on the site. Neither does the objector’s offer to provide planting and habitat enhancement in, and adjacent to, the site. The existing screening vegetation on the site’s boundaries, its proximity to public transport facilities, its physical suitability for development, and the possibility of providing an element of social housing are factors that exist in respect of
many objection sites and, in themselves, do not justify inclusion of the land within the SDL.

We do not agree with the objector that all of the lands to the south of the Old Carrick Road should be excluded from the AOHSV, given that their character is very similar to that of the lands on the northern side. Notwithstanding the current use of the site, its exclusion from the AOHSV would be illogical, as it would leave a large ‘gap’ in the designation. We recommend no change to the Plan as a result of the objection.

**Land at Doagh Road**  
(Objection 484)

The site comprises a filling station (now used as a car wash) and associated buildings/parking areas on the northern side of Doagh Road, close to the junction with Carntall Road. There are commercial buildings opposite, within the proposed SDL and employment zoning MNY 07. A café lies immediately to the west. The objection sought inclusion of the site within the SDL and argued that this was justified given the commercial activities taking place on this site and adjoining land, with the benefit of planning permissions obtained over recent years. It was submitted that the northern side of the Doagh Road has numerous developments along the road frontage and to the rear, “which would provide a true reflection of the development limit”.

Whilst the objection referred to other lands on the northern side of Doagh road, only the filling station and its curtilage at No. 581 was identified on the attached plan. We can, therefore, only consider that area. We acknowledge that there are various buildings, including some in commercial use, on the northern side of Doagh Road. However, there are also gaps between buildings, and the row of development on the northern road edge is far from continuous. The commercial use of the objection site would fall comfortably within an urban area; however, filling stations and other commercial buildings are not unusual in the rural area. Commercial use, per se, does not justify inclusion within the SDL. At this particular location, the Doagh Road represents a strong and defensible physical limit to the settlement, irrespective of the presence of buildings along its northern side. Inclusion of the objection site within the SDL would result in an isolated and illogical extension of the latter across Doagh Road and would, therefore, be unacceptable. We recommend no change to the Plan as a result of the objection.

**Lands at Ballynure Road/ west of A8(M)**

**Objections 1201, 1931, 2529/1, and 2952**

The lands containing objection site 1201 were described in the written submission as being bounded by Mossvale Road, Doagh Road, the A8 and the Belfast – Antrim railway line. At the Inquiry the objector tabled a plan excluding parts of the site abutting Mossvale and Doagh Roads, which were either currently occupied by non-commercial buildings or considered unsuitable for development. The site as reduced comprises agricultural lands together with a large commercial complex containing various buildings and areas of parking for haulage use. The objection sought inclusion of the lands within
the SDL, zoning of the undeveloped lands for employment use and zoning of the currently utilised areas as a major area of existing employment.

Objection 2952 relates to a large area of agricultural land stretching southwards from the railway line west of employment zoning MNY 07 to the northern edge of the proposed PA 06 road proposal indicated in Plan amendment No.1. The site includes various existing residential and commercial properties. The objection sought inclusion of the site within the SDL and its zoning as a DOS, mainly residential. At the Inquiry, the objector indicated that only the portion of site 1931 directly overlapping with 2952, was being pursued. Objection site 2529/1 includes site 1201 and that part of site 2952 lying to the north of Ballyclare Road.

We note that there is no objection to the proposed MNY 41 (Ballycraigy) LLPA designation, which affects some of the subject lands. This is an extensive designation extending westwards from the A8, between Ballyclare Road and the M2. We have already stated that such designations do not automatically preclude development. We do not consider that the presence of the proposed LLPA designation, in itself, renders the objection lands unacceptable. The scoring in the Department’s matrices in respect of the LLPA has had no influence on our consideration of the sites.

The A8(M) motorway runs between Sandyknowes roundabout and Corr’s Corner. The A8 Ballynure Road dual carriageway runs northwards from the latter. Both sections of this road currently present a strong visual and physical limit to the urban area, notwithstanding the various links at Corr’s Corner, Ballyclare Road, Ballycraigy Road and Doagh Road. Land to the west of the A8 generally has a character that is more rural than urban, notwithstanding the existence of some built development that is substantial in scale. We note that there are lands to the west of the A8, south of Ballyclare Road, that are not the subject of objection and inclusion of the sites would therefore result in an illogical urban form.

We acknowledge the presence of the long-standing large commercial complex within site 1201; however, this is separated from the A8 by a church and agricultural land. In our opinion it does not read as an extension of zoning MNY 07 or as part of the settlement. The inclusion of site 1201 within the settlement would result in urban sprawl to the northwest and an isolated salient of employment-related development beyond the A8. We have no evidence to demonstrate that additional employment land is needed in Newtownabbey, beyond the already generous allocation in the draft Plan. We consider that the A8 is a logical limit to the westward expansion of the settlement. Irrespective of the Department’s reasoning, we do not consider the MNY08 and MNY 09 employment zonings at Mallusk to be appropriate in terms of urban form. They will result in a narrow salient of development extending into the countryside. They do not justify similarly unacceptable urban extensions elsewhere. We accept that the Department has identified existing employment at Maryland in Castlereagh District; we do not consider this to represent a precedent for identifying all commercial enterprises in the countryside as Plan zonings. The objector’s threat to relocate his business outside Northern Ireland does not justify inclusion of the site within the settlement. Other zoned lands exist within the SDL into which the objector could expand or relocate and we are not convinced that the existing site is the only one from which the business could operate. The current employment uses on the site, if established or approved, can continue. We note that regional policy does not place a total embargo on the expansion of commercial
enterprises in the countryside and the objector’s business and economic arguments are matters that could be given consideration through the development management process. The sustainable and strategically appropriate location of site 1201 is recognised but does not outweigh our conclusions in terms of urban form. Neither does the offer of planting and landscaping to reduce the visual impact of the existing business.

With regard to the other sites, our comments on the allocation of housing land in Newtownabbey are contained in Part 1 of our report. As we have stated elsewhere, the zoning of DOSs on greenfield lands is not appropriate. We do not consider that the strategic directions for growth in the RDS particularly favour the inclusion of these sites within the SDL, or justify setting aside our conclusions regarding the appropriate location of the urban limit at this location. The necessary growth in Metropolitan Newtownabbey can be provided for on other sites, which will result in an appropriate form of expansion for the settlement, and which also lie close to employment lands, housing and transport corridors. We have recommended that the PA 06 proposal is deleted from the Plan and this factor therefore has no bearing on our consideration of the objections. In any event, the land take for the road proposal would not in itself have justified extending the settlement across the A8. The physical suitability of the sites for development, their sustainable location close to employment lands, public transport and facilities, or offers of additional landscaping are not factors that outweigh our conclusions. We recommend no change to the Plan as a result of any of these objections.

Objection 2907

This site comprises a two-storey dwelling and its associated curtilage in a row of three residential properties fronting onto Ballycraigy Road. A further dwelling lies immediately to the south. The objection sought inclusion of the site within the SDL.

Our conclusions on the appropriateness of urban development west of the A8 are set out above. The plot lies in the open countryside. The site is isolated from the settlement and its inclusion within the SDL would be illogical. We recommend no change to the Plan as a result of the objection.

Objection 2017

The site consists of various agricultural lands and buildings immediately to the north of the Sandyknowes roundabout. It is bounded by the M2 motorway to the south west and the A8(M) to the east. The site rises gently from south to north. The objection sought inclusion of the site within the settlement limit and its identification as a park and ride facility in lieu of the Plan proposal at Fortwilliam. The objection was also to the proposed MNY 40 (sic) LLPA designation, seeking its deletion from the site.

We have already dealt with the issue of a park and ride facility at Sandyknowes (see section relating to Belfast Harbour). In any event, there is no reason why a park and ride facility need fall within the SDL. We have already stated that the A8(M) is a logical and strong physical and visual limit to the settlement and for this reason also we do not
consider that the site should be included within the settlement. The site lies within the proposed MNY 41 LLPA – Ballycraigy. We presume this is the designation to which the objector meant to refer. We were presented with no reasoning as to why the designation is unjustified that would allow us to consider the issue further. We recommend no change to the Plan as a result of the objection.

### Lands at Antrim Road, Mallusk
(Objections 211, 1944 and 1945)

Objection sites 1944 and 1945 directly overlap and comprise the City of Belfast Playing Fields and Golf Course, and both developed and vacant lands fronting onto the southern side of Antrim Road. Objection site 211 is fully contained within the aforementioned lands and contains a row of built development including several dwellings, commercial premises, and the Chimney Corner Hotel. The objections all sought inclusion of the lands within the SDL. 1944 and 1945 sought identification of the site as open space.

The Department considered that the playing fields and golf course should be brought within the SDL and identified as open space.

The objection sites are almost completely enveloped by lands within the settlement limit in the draft Plan. Our recommendation below, in respect of objections 757, 759, 766, 2529/9 and 3498, would result in complete enclosure. There is no fundamental reason why open space should be excluded from the SDL and the Department’s position is logical. Regional policy will ensure its protection. Given our conclusion, and the fact that much of it is already developed, it would make no sense to exclude objection site 211 from the settlement. We recommend accordingly.

**Recommendation**

We recommend that the sites are included within the SDL and all existing open space is identified as such in the Plan.

### Lands at Park Road
(Objections 757, 759, 2529/9 [as reduced] and 3498)

*See also our subsequent conclusion in respect of objection 766 under designation MNY 09.*

These sites, considered together, comprise a number of adjoining fields on the western side of Park Road. Field boundaries consist of various trees, sparse hedges and fencing. There are two small rivers within the lands, which are low-lying, and fall gently from north to south before rising slightly towards Mallusk Road. The lands are bounded to the north by employment zoning MNY 09, to the east by the City of Belfast Playing Fields, to the west by open fields, and to the south by residential development. The objections sought inclusion of the sites within the SDL for housing. In addition, objection 759 was also to the Park Road West SLNCI (MNY 39/07) and the Ballymartin Water
LLPA (MNY 42); objections 757 and 3498 referred to the latter LLPA. The Department considered that inclusion of the land within the SDL would be acceptable.

At present, the northern section of Park Road runs through open or agricultural land and presents itself as a logical limit to the settlement. The development of employment zoning MNY 09 will, however, undermine this role and result in an extension of the urban area well beyond Park Road, to the west. In addition, the settlement already extends westwards beyond Park Road closer to the Mallusk Road. Housing on the lands would not result in a westward extension of Newtownabbey as it would essentially infill an area between urban limits identified in the draft Plan. Development would not be prominent, nor would it conflict with the need to maintain a compact urban form. Buffer planting can ensure the provision of a robust new settlement limit along the western boundary of the lands. Potential flooding was not raised as an obstacle, in principle, to inclusion of the lands for housing. Clearly, it will be necessary to identify the extent of the flood plain and avoid built development thereon.

The objections to the SLNCI and LLPA were not explained. Objection 757 states that development can be designed so that it would not impinge on the designations. We have stated that such designations do not automatically preclude development. They affect only a small portion of the lands in question. We are not persuaded that the extent of MNY 39/07 or MNY 42 should be amended in the Plan.

With regard to the suggested KSRs, we refer to our introductory notes. Submission of a TA, access arrangements (including pedestrian) and required infrastructure are matters dealt with by regional policy. Treatment of the rivers and LLPA within the site and the landscaping/maintenance thereof are matters for the design and development management stages, as is the need to address the interface with the adjacent greenfield employment zoning. Given that the zoning will comprise various parcels of land, a KSR requiring submission of a concept masterplan for its entirety is appropriate.

**Recommendation**

We recommend that objection sites 757, 759, 766, 2529/9 and 3498, as shown hatched on the attached Plan No. 1, are included within the settlement limit and zoned (as a single zoning) for housing, subject to the following KSRs:

- The floodplain of the watercourses within the lands shall be identified prior to commencement of development. No built development shall take place within the identified area.

- A Concept Masterplan to facilitate the comprehensive development of the zoning shall be submitted to, and agreed with, the Department.

**Lands at Mallusk Road**

**Objections 360 and 394**

Objection 360 relates to two areas abutting the northern and southern sides of Mallusk Road, immediately to the west of, and opposite, the Cottonmount Arms public house.
Objection 394 refers to the “field at 117 Mallusk Road”. The land on the southern side of the road is in use as rugby pitches. That on the northern side comprises 2 areas: a field with an unkempt appearance containing goalposts, and a road frontage field adjacent to No.117 Mallusk Road (to the rear of Nos. 127 & 129). The latter field falls from south to north. Its roadside boundary is a post and wire fence; the remaining boundaries consist of various trees and hedges. The objector explained that the field containing goal posts is maintained as open space but is no longer formally used for sport. It was argued that the lands had been included within the SDL in the BUAP and should thus be located within the settlement in BMAP. The Department considered that site 394 would be suitable for housing if linked with the newly zoned lands on Park Road.

Development schemes or proposals relating to other unspecified lands, some of which may previously have been in recreational use, have little bearing on our consideration of these objections. Whilst the objector indicated at the Inquiry that it would be desirable to have a future option to utilise some of the lands for commercial purposes, neither original submission sought zoning of the land for development, merely its inclusion within the settlement; the Department’s production of matrices for both sites was therefore inappropriate. The fact that the lands were within the SDL in a previous plan does not fetter reconsideration of their status in BMAP. We note that they were not zoned for development in the BUAP. The disused football pitch has strong vegetated boundaries on its northern and western sides but is open to the road. The land containing the rugby pitches is well defined by trees and hedges along its northwestern and southwestern sides; it is also visible from the road and the adjacent car park. Notwithstanding their enclosure relative to the rural area, inclusion of these sites would unacceptably extend the SDL along both sides of Mallusk Road, resulting in a less compact and logical urban form. We do not consider that these areas should be located within the SDL.

With regard to the field to the rear of No.117, we note that this is in agricultural use. It differs from the other land in that it falls away from the road and is bounded on three sides by land within the draft Plan’s SDL. The western boundary is well defined and could be augmented with buffer planting to provide a strong urban limit. Development on the site would not be prominent and would relate well to that within the adjacent urban area. We consider that this field should be brought within the SDL. In the absence of a specific proposal from the objector, however, we cannot recommend a zoning.

**Recommendation**

We recommend that site 394 is brought within the settlement limit.

**Objection 1730 (Craigarogan Quarry)**

The objection relates to a large area of land on the southern side of Mallusk Road, to the west of objection site 360. The site is bounded by Sealstown Road to the south, Mallusk Road to the north, and connects with Bernice Road at two points, to the northwest. The area identified contains a number of commercial enterprises including a landfill site, a quarry, and concrete/asphalt works. The objection sought inclusion of the site within the settlement limit. It was argued that the Plan should recognise the existence of the long-established commercial uses by zoning the site as existing
industry and employment. It was posited that this would be consistent with the RDS and PPS4.

We acknowledge the importance of Mallusk as a location for existing employment and we note that the Plan includes large areas of existing employment land within the SDL. The mere presence of existing employment uses does not, however, automatically justify inclusion of same within the SDL. The desirability of maintaining a logical and compact urban form is also a major consideration. We consider the inclusion of MNY 21 within the SDL to be logical in terms of urban form; it contains buildings and a commercial use and is bounded by development to the north and south; the use of the site as a concrete works is not a determining factor in reaching this conclusion.

Whilst we recognise the contribution to the economy of the businesses within the subject objection site, it would be illogical to include the lands within the settlement limit as they would connect with the urban area only along the southwestern boundary of zoning MNY 21. Inclusion of the site would result in an excessive westward extension of the SDL with areas of countryside abutting to the north and south/southeast. This would not be conducive to retention of a compact urban form. In our opinion, zonings MNY 08 and MNY 09 in the draft Plan extend the SDL in an inappropriate manner into the rural area. In respect of objection 3633/15 we conclude later that it would be illogical to exclude the portion of MNY 09 south of the Ballymartin River from the SDL. As there is no objection to the remainder of MNY 09 or MNY 08, these zonings will eventually be adopted in the Plan. Notwithstanding this, we do not consider that this form of urban extension justifies a repetition elsewhere, as it will inevitably result in an inappropriate urban form.

We recognise the advice in PPS4 that Plans are intended to provide certainty about the type of development permitted at various locations, and that employment land will be zoned. We note the objector’s recognition of the statement in PPS4 that zonings will not normally be made for industrial development in the countryside, outside development limits. We accept that there could be exceptional circumstances where industrial development beyond the urban area may be zoned and we recognise that BMAP has identified a small number of existing employment zonings outside settlement limits. Notwithstanding this, it is our opinion that it would be illogical to attempt to zone every site in the countryside that contributes to the economy’s employment base, particularly given the large number of rural businesses. Provided that such businesses are not unauthorised, there would be no impediment to their continued operation. We recommend no change to the Plan as a result of the objection.

**Land at Sealstown Road**

**Objection 3502**

The site consists of several fields on the southern side of Sealstown Road. The land rises markedly from northeast to southwest. The site boundaries are defined by various trees and hedges. The objection sought inclusion of the site within the SDL; reference was made to the inadequate housing land allocation in the Plan.
The site is physically unrelated to the proposed settlement limit in the draft Plan. It abuts objection site 755 (see below) only at its eastern apex. Its inclusion within the settlement would result in an isolated urban salient projecting into the rural area. This would result in an inappropriate extension to the settlement and would not retain a compact urban form. We recommend no change to the Plan as a result of this objection.

**Objection 755**

This site comprises an area of rough, low-lying land straddling the Ballymartin Water. It is bounded on the western side by Grange Lane, a private roadway serving several rural dwellings. The eastern boundary is contiguous with Trench Lane, with a large area of housing beyond. The northwestern side abuts a complex of derelict commercial buildings, which lies within the settlement limit, as does the land within the site on the eastern side of the river. The objection, which referred to the housing allocation in the Plan, sought inclusion of the site within the SDL. The objection to the proposed MNY 42 LLPA was withdrawn at the Inquiry. The Department considered that the zoning of the site for housing would be acceptable.

Housing on the site would infill an indent in the settlement form. Development thereon would not be prominent and would sit into the existing urban area. The proposed LLPA does not preclude development. It is confined to the river corridor and can be protected and incorporated into any design scheme. Access to the site from Hydepark Manor does not appear to be problematic. With regard to the KSRs suggested by the Department, we note that the majority of the matters are either dealt with by regional policy or can be addressed at the design/development management stage. This includes the treatment of the LLPA within the site. A KSR is required to ensure that no development should take place on the floodplain of the Ballymartin Water within the site.

**Recommendation**

We recommend that the site is included within the settlement limit and zoned for housing, subject to the following KSR:-

- The floodplain of the Ballymartin Water within the lands shall be identified prior to commencement of development. No built development shall take place within the identified area.

**Lands at Hydepark Road**

**Objection 3191**

Site 3191 comprises various fields and includes a farm complex and a vacant bungalow. The site is currently accessed via a laneway off Hydepark Road. The land is fairly level and its boundaries are defined by various trees and hedges. The objection sought inclusion of the land within the settlement and its identification as a DOS, mainly residential. The Department considered that the site would be suitable for housing.
As we have stated elsewhere, zoning of greenfield land as a DOS is inappropriate. We are not convinced that there are insurmountable problems in respect of access to this site. The land is physically suitable for development and housing thereon would not be prominent. The new development limit would follow established, vegetated field boundaries. Inclusion of the site within the SDL would provide a logical extension to the settlement at an acceptable scale. We recommend accordingly.

With regard to the suggested KSRs, the majority of the matters are either dealt with by regional policy or can be addressed at the design/development management stage. This includes the treatment of the LLPA within the site. It is clear that no development should take place on the floodplain of the Ballymartin Water; a KSR to address this point is necessary.

**Recommendation**

We recommend that: site 3191 is included within the SDL and zoned for housing, subject to the following KSR:-

- The floodplain of the Ballymartin Water within the lands shall be identified prior to commencement of development. No built development shall take place within the identified area.

**Objections 94 and 3194,**

Site 3194 is currently accessed via Hydepark Lane. It comprises agricultural land to either side of that laneway. The objection sought inclusion of the lands within the settlement and their identification as a DOS, mainly residential. Objection 94 relates to a number of fields immediately south of site 3194. The Department considered that site 3194 would be suitable for housing.

We have already set out our conclusions on housing land allocation for Newtownabbey district. We do not consider that provision of access to either site is an impediment to development. Our conclusions on DOSs are set out in Part 1 of our report; we do not consider that green field lands outside the current SDL should be so zoned. Notwithstanding that development on the sites would not be prominent, we consider that inclusion of either or both sites within the SDL would extend an illogical salient of development into the rural area and conflict with the need to retain a compact urban form. We note that the lands to both east and west of the sites are not subject to objection. Site 1720 does not abut the subject lands and in any event we have not recommended its inclusion within the settlement limit. We recommend no change to the Plan as a result of the objections.

**Objections 398, 1720, 2529/4, 2965/128, 3622, 3695, and 3699 (includes proposal MNY 24 – Hightown Road Link)**

Site 1720 extends to over 47 hectares and comprises a large number of fields on the southern side of Hydepark Road, between objection site 3196 and the Boghill Road. It contains several roadside dwellings and agricultural buildings. The site extends some
0.7 km southwest of Hydepark Road at its ‘deepest’ point and has a frontage of almost 1 km along Boghill Road. The objection sought inclusion of the site within the settlement for development.

Site 398 is a fairly level field bounded to the southwest by Upper Hightown Road, and to the northeast by ‘The Beeches’ – a new housing development within zoning MNY 02/23. A row of road frontage development separates the site from Hightown Road. The southeastern boundary is defined by a good hedge and trees. The objection sought inclusion of the site within the settlement limit and its zoning for housing.

Notwithstanding that no plan was supplied with the original submission, the Department identified various elements to objection 3622. From the drawings subsequently submitted, it appears to overlap directly with site 3695. The latter extends to 62 hectares. It comprises two large portions of land: an area of agricultural land on the southwestern side of Hydepark and Upper Hightown Roads, with a frontage of 0.9 km to same, and an area on the northeastern side of Upper Hightown Road extending to meet housing zoning MNY 05/21. The site contains a number of roadside dwellings and buildings. Site 3695 incorporates all of site 398. Site 2529/4 largely overlaps with that part of 3695 northeast of Upper Hightown Road. Objection 3695 sought inclusion of the site within the SDL and its identification as a DOS for housing. Objection 2529/4 sought inclusion of the lands within the SDL and zoning for housing. The Department considered all of the abovementioned sites suitable for inclusion within the SDL.

As stated already, we do not consider it appropriate for DOSs to be zoned on greenfield sites. Our comments on the housing land allocation in Newtownabbey and throughout the BMA, are contained in Part 1 of our report. In the subject volume report we have identified sufficient land for inclusion within the settlement limits in order to address the uplifted HGI figure for Metropolitan Newtownabbey.

We acknowledge that the lands within site 1720 are not elevated and development thereon would not be prominent in the local landscape. We note that not only housing is proposed within the lands and accept that benefits could result from provision of local community and educational facilities. We accept that the site is in a strategically favourable location, close to employment lands and the M2 motorway. However, inclusion of the site would result in excessive growth of the settlement and considerable urban sprawl southwest from zoning MNY 03/20. We consider that parts of site 1720 closer to Hydepark Road could be developed, whilst retaining a more appropriate compact urban form. However, a reduction of the site is not before us. We must therefore reject the site as submitted.

Development on the southwestern portion of site 3695 would result in urban sprawl and excessive growth of the settlement southwards. This portion of the site forms an important part of the setting of Newtownabbey and development thereon would be visually intrusive, projecting into very open agricultural land. This would be particularly perceptible when travelling in both directions on Upper Hightown Road. We consider this part of site 3695 to be unacceptable as submitted. In our view, parts of this portion of the site closer to the Boghill and Hightown Road junctions would be suitable for development if additional housing land is required to meet the STLR. However, as subdivision of lands subject to objection 3695 is not before us, we must reject the site as submitted. We reach this conclusion irrespective of the various arguments put
forward by the objector in respect of the physical, infrastructural, strategic, and other benefits in developing the lands.

Inclusion of site 2529/4 would extend the settlement towards the south and along the Upper Hightown Road. Whilst it would not maintain a particularly compact urban form, it would be enclosed by existing development to the north, higher land to the east and southeast, and the Upper Hightown Road. It would thus represent a logical urban extension. We do not consider that development on the land would be unduly prominent. Buffer planting could provide a new and substantial edge to the settlement. Impacts on adjacent properties can be addressed at the design stage. We note that, unlike site 3965, site 2529/4 does not impinge on the proposed AOHSV, which we consider to be a sensitive location. We consider that site 2529/4 (excluding site 398) should be held in the Short Term Land Reserve (STLR) for the district and released if needed. With regard to the KSRs suggested by the Department, the TA, which would inevitably be required by PPS3, would identify any new roads infrastructure required in association with the development, including provision of the MNY 24 link road. The other issues raised are either dealt with by regional policy or can be addressed at the design/development management stages.

We see no reason why site 398 cannot be considered separately from the surrounding objection lands. It is an individual field and a relatively small, self-contained site that is readily identifiable as a discrete entity. Access via the adjacent MNY 02/23 zoning appears to be feasible. Its development would sit into existing development on Hightown Road and at ‘The Beeches’ and would result in a compact urban form. Housing on the site would not be prominent. The existing field boundaries could be retained and augmented to provide a strong urban/rural interface. We consider that the site should be zoned for housing. We consider that the points raised by the counter objectors, in respect of impact on adjacent properties, can be addressed at the design/development management stage. We do not consider that the development of this small site should be fettered by a KSR requiring a contribution to the Hightown Road Link or submission of a CMP for a larger area. The other KSRs suggested by the Department are matters for the design stage or are covered by regional policy.

Objection site 2965/128 overlaps with a large proportion of site 3695, including additional fields adjacent to Hightown Road. The objection, from Belfast City Council, sought identification of a new cemetery on the lands. The Plan does not contain policy or proposals in respect of cemetery provision. There is no reason why a cemetery need be located within a settlement. Rural policy would not preclude such a proposal. The issue raised by Belfast City Council on site 2965/128, is a matter that can be dealt with through the development management process; we do not, therefore, make any recommendations with regard to the objection.

Objection 3699 sought the realignment of the Hightown Road Link, to run through land on the southern side of Hydepark Road. An alternative layout was tabled at the Inquiry, involving provision of a new roundabout at the Boghill Road junction. It was stated that the necessary land has been acquired but that funding can only be delivered by additional housing within objection sites 1720 and 3695. It was argued that the road line in the Plan Amendment No.1 cannot be provided without vesting, which would be difficult. Roads Service advised that it would fund construction of the link road if the developer were to contribute the required land. From the evidence submitted it is
Unclear if there is any requirement to provide the road in association with development on housing zoning MNY 03/20, which is not subject to KSRs as work had commenced on site before the Plan was prepared.

MNY 24 is not a strategic road scheme. Whilst Roads service cited a “benefit to the general public” in the road’s provision, we note that access to Glengormley and Mallusk exists via the Hightown Road at present. We do accept, however, that the road scheme would reduce pressure on Hightown Road and facilitate new development in the immediate area. The Plan proposal runs through housing zoning MNY 03/20 and we are not convinced that difficulties with land ownership cannot be overcome. Whilst a roundabout may be safer and operate better than a junction, no convincing evidence has been put forward that the former is the only solution. Provision of the MNY 24 proposal may be beneficial but is not so urgent that it outweighs our conclusions in respect of sites 1720 and 3695. The objector indicated that the preferred amendment to the Plan was to incorporate wording to the effect that alternative road lines are possible and, if deemed satisfactory by the Department, the Plan proposal will no longer be required. Roads Service indicated that it would examine any scheme put forward and that there would be alternatives to the Plan proposal. We consider that the proposal should be retained in the Plan but that the objector’s suggested wording should be adopted in respect of possible alternatives.

**Recommendation**

We recommend that:

- In respect of MNY 24: the Plan Amendment No.1 should be altered to indicate that, in the event of an alternative road proposal coming forward, being approved by the Department, and its provision secured, the Plan proposal will no longer be required.
- Site 398 be included within the settlement development limit and zoned for housing.
- Site 2529/4 (excluding site 398) should be held in the Short Term Land Reserve (STLR) for the district and released if required.

**Objections 644, 1168, and 3488**

Site 3488 encompasses housing zoning MNY 05/21, land between that zoning and Edmund Rice School, and additional lands to the south. The latter area contains part of the grounds of St. Enda’s GAA Club. We were provided with a plan indicating the extent of a planning approval for residential development within the site. The objection sought an extension of the zoning to mirror the boundaries of the approval. We consider this to be logical and recommend accordingly. This recommendation deals with the issues regarding the extent of the zoning raised in objections 644 and 1168.

All of the objections submitted that the Plan should indicate the existence of the GAA grounds. Objection 3488 argued that they should be brought within the settlement limit
and zoned for recreational/community purposes. Our comments on the identification of open space in the Plan are set out in Part 1 of our report. There is no reason why open space abutting the settlement should be brought within the urban limit. We concluded that existing sports facilities in the countryside should be identified in the Plan if they were included in the Department’s open space audit. We note that St. Enda’s is listed in table 63 of Technical Supplement 7. Given this it should be identified as existing open space, outside the SDL, on the Plan map.

Objection 3488 also sought the inclusion of the remainder of site 3488 (i.e. land outwith the expanded zoning and the sports grounds) within the settlement, its exclusion from the proposed AOHSV, and its zoning for housing. We do not agree with the objector that this part of the site is an isolated wedge between existing areas of built development. It forms part of the steeply rising escarpment, to the south of the approved and existing housing, and to the east of the gaelic pitches. It is visible from viewpoints both in the immediate locality and some distance away, throughout Newtownabbey. Development thereon would unacceptably extend built development into the hills, which form the setting of the city, and have been proposed as an AOHSV in recognition of this function; we consider the designation to be justified. We do not accept that inclusion of the site would rationalise or round off the settlement limit; nor do not consider the latter to be ‘convoluted’ or indefensible at this location.

**Recommendation**

We recommend that:

- Zoning MNY 05/21 is extended to incorporate all land approved under planning consent U/2003/0753/O.

- The Sports pitches to the south of the zoning are identified as existing open space (outside the settlement limit) in the Plan.

**Objection 3516**

This site, as reduced, comprises rising agricultural land to the south of Hightown Rise and Collinbridge Gardens. A Belfast Hills Access Point (NY 06/01) is proposed close to the northeastern apex of the site at Hightown Rise. The objection to this was withdrawn. There is a ‘gap’ between the western site boundary and site 3488. The remaining elements of the objection sought inclusion of the lands for “development purposes” and their exclusion from the proposed AOHSV and AOCMD. The objection referred to the inadequate housing allocation for the district.

We have already commented on the strategic issue of housing land provision in Metropolitan Newtownabbey. Our conclusions on AOCMDs are set out in Part 1 of our report and we need not consider this issue further. We note the objector’s offer to transfer land to Belfast City Council for recreational use/management as part of the Belfast Hills and to facilitate provision of access to same. However, no further detail was provided in respect of the issue that would allow us to attach significant weight to it. We were advised that no discussions with BCC had taken place. In any event, the site forms part of the rising escarpment to the south of an already elevated housing area. It
is visible from various vantage points throughout Newtownabbey, particularly from Glengormley, and housing thereon would be unacceptably prominent. We consider the AOHSV designation to be justified at this location as the escarpment, of which the site forms an integral part, is an important setting for the city. We do not accept the objector’s assertion that inclusion of the site would provide a more compact urban form. We do not consider that careful design could mitigate the unacceptable visual impact of housing on the site. The availability of services and infrastructure, the physical suitability of the site for development, the offer of a proportion of social/affordable housing, and the sustainability of the location are not factors that outweigh our conclusions. We recommend no change to the Plan as a result of the objection.

**OBJECTIONS TO HOUSING ZONINGS**

**MNY 02/19 – Glengormley Park, Antrim Road and MNY 04/09 – 4 Glenwell Road, Glengormley (also seeking zoning of MNY 04/09 as a DOS)**

(Objections 3540/1, 2 & 4)

The objection related to two parcels of land off the Glenwell Road, Newtownabbey. The first, a committed housing zoning MNY 02/19 has already been constructed. This estate, Glengormley Park, comprises a mix of semi-detached and detached two storey dwellings accessed via Laundry Lane. The second site, accessed from Glenwell Road itself comprises the site of a large depot building, since demolished. The site is fenced off on all sides and covered in tarmac and concrete. It lies at a lower level than the adjacent Glengormley Park.

The objection related to the key site requirements for both sites. It went on to state that Zoning MNY 04/09 should be a Development Opportunity Site (DOS) and that it should not be restricted by density limitations.

Zoning MNY 02/19 is shown in the Plan as a committed housing site and does not have any key site requirements. The development has already been built and we make no further comment on this zoning.

Zoning MNY 04/09 contains several key site requirements, including a minimum gross density of 30 dwellings per hectare. A minimum density requirement for this zoning is in line with the thrust within the Regional Development Strategy for the efficient use of land for housing within urban areas. We disagree that this is a site that could be developed without density limitations given its restricted nature and the surrounding site context.

We do not consider that the site merits designation as a DOS as it is not strategically located, nor would its designation as a DOS meet any of the other important Plan objectives. We recommend no change to the Plan.

**MNY 03/05 – Land adjacent to 27 Ballyduff Road, Carnmoney**

(Objection 2760/63)

The objection related to housing zoning MNY 03/05, a committed housing site on the Ballyduff Road. The site measures 0.23 ha and comprises two disused church halls...
and their curtilages. The larger hall has suffered some dilapidation, whilst the smaller Ballyduff Mission Hall is in better condition. The site sits above road level is fenced off. It sits adjacent and east of a series of retail units located at the junction of Ballyduff Road with Carnmoney Road. There is a new development being erected opposite and north-west of the site. There are housing developments adjacent and south and east of the site.

The objection from Tesco seeks that the zoning should allow for a local store. The site has a previous outline approval for 13 two bed apartments from 2002. A more recent scheme seeking full planning permission for 23 apartments was pending at the time of submission of evidence to the Inquiry. Given the planning history of the site it is logical that it is zoned in the Plan as a committed housing site. A request for a new local store would be better pursued through the development management process. We agree with the Department and counter-objectors that the zoning should stand and we recommend no change to the Plan.

**MNY 05/14 – Rear of Rathcoole Drive and Ballyronan Park**
(Objection 695/8)

This objection sought changes to the KSRs, viz: a reduction in the housing density, and a greater buffer zone between the zoning and the Glas-na-braden SLNCI (Designation MNY09/04). However, as the housing development on the zoned site is complete, this objection is now redundant. We recommend no change to the plan.

**MNY 05/16 – Land to Rear of Meadowbank**
(Objections 866/3, 1873/16, & 3179)

Objection 1873 sought deletion of the zoning and use of the site as open space. Objection 866/3 raised various concerns in respect of the zoning.

We note from the Department’s submission that an application for housing on the northwestern part of the zoning has been approved and observed that the development is almost complete. Whilst development of the remainder of the zoning would encroach into agricultural lands lying between Newtownabbey and Greenisland, it would not result in a reduction in the proximity of the two settlements or prejudice the strategic function of the CE 04 RLW. It would square-off the urban form at this location and extend the settlement to two strong physical limits, namely, a disused section of railway line, and the Silver Stream, both of which are heavily vegetated. There is already built development abutting the Silver Stream to the south of the zoning.

The extent of the landscape wedges which were, or should have been, identified in the BUAP is of little relevance to BMAP, which proposes amended wedges and development limits. Whilst we accept that the majority of the site does not fall within the urban footprint, there is no requirement for all zonings to do so. The RDS recognises that some green field land will be required for development. There is no persuasive evidence that traffic generated by development would be unacceptable and the zoning would clearly have been subject to Roads Service scrutiny. Any necessary improvements to infrastructure can be identified through the development management...
process. The KSR relating to density requires a minimum of 20 dwellings per hectare, which we do not consider to be excessive. The upper limit of 40 dwellings per hectare referred to in the KSR is not a requirement; the density eventually provided will be a matter for the development management process and will have to take into consideration the location and context of the site. The potential impact of housing on the site upon the residential amenity of existing properties, the setting of Meadowbank Farm, and wildlife in the area, including badgers, are all matters that can be addressed at the design/development management stage. The KSR requiring landscape buffers can result in enhancement of the wildlife corridor along the Silver Stream where it abuts the site, irrespective of the objector’s view to the contrary. Legislation exists to protect any archaeological remains within the site. We do not see how the zoning, in itself, would adversely affect the use of the disused railway by walkers. We do not agree that it would be appropriate to rezone the site as open space to serve adjacent housing, in the absence of a district Council proposal to develop and maintain the facility, and when the site is not integral to the adjacent housing estate. Open space within the zoning itself is required by regional policy and is a matter for the design process.

We see sound logic in retaining the zoning and recommend no change to the Plan as a result of the objections.

Objection 3179 sought deletion or amendment of the KSRs in respect of the zoning; however, no explanation was put forward in support of the objection that would enable us to consider the matter further.

**MNY 05/21 – Land at Hightown Road**

Please also refer to objections 0644, 1168, and 3488 above.

**Objection 3491**

This objection sought the deletion from the Plan of the KSRs relating to the housing zoning. The Department indicated that planning consent had been granted and the attached conditions would ensure a satisfactory form of development on the site; in light of this the KSRs are now redundant and could be deleted. We have no reason to demur and recommend accordingly.

**Recommendation**

We recommend that the KSRs are deleted from the Plan.

**MNY 06/01 – Derrycoole Walk**

(Objection 3825/64)

This objection from NIHE sought an amendment to the boundary of the social housing zoning to include an adjacent area of open space, which had previously been occupied by housing. It was stated that the land had been identified in the Housing Executive’s estate appraisal for Rathcoole as suitable for regeneration.
The Department accepted the suggested zoning of the area identified by the NIHE. Given the need for additional social housing in Newtownabbey, we have no reason to disagree with the Department’s position and recommend accordingly.

**Recommendation**

The boundary of social housing zoning MNY 06/01 should be amended to accord with the area shown shaded green and annotated 06/01 on the attached Plan No. 2.

**MNY 06/04 – Drumcree Place**
*(Objection 3825/39)*

This NIHE objection pointed out that the subject zoning covers an existing housing development. It was submitted that the site was zoned by mistake and that the zoning should have related to the adjacent site at Derrycoole Way.

The Department indicated that it would be appropriate to withdraw this zoning from the Plan. It also accepted the suggested zoning of the area identified by the NIHE. Given the need for additional social housing in Newtownabbey we have no reason to disagree with the Department’s position and recommend accordingly.

**Recommendation**

The boundary of social housing zoning MNY 06/04 should be amended to exclude the area shown on Plan map No.2w and to include the area shown shaded green and annotated 06/04 on the attached Plan No. 2.

**MNY 06/05 – Felden Government Training Centre**
*(Objection 3825/41 & 53)*

The Objection from NIHE relates to social housing zoning MNY 06/05. It comprises the now vacant Felden Government Training Centre, a campus of buildings situated between Mill Road and the M2. The site access is from Mill Road and the site is disused. The buildings are in various states of disrepair. The site lies adjacent to housing developments on two sides, along with some commercial buildings.

The objection seeks that the site be rezoned to allow for mixed use and mixed tenure. It was also stated that an element of private housing be included.

Given our conclusions in Part 1 of the Report, the Plan does not adequately provide for social housing over the period. We are not persuaded that it would be logical to further reduce the amount of potential social housing in the Plan area and within Metropolitan Newtownabbey by rezoning the site to allow for private housing or indeed other non-residential uses. Those uses can be met through sites elsewhere in the district and wider Plan area. We recommend no change to the Plan.
OBJECTIONS SEEKING ADDITIONAL HOUSING WITHIN THE SDL

Lands at Carnmoney Hill

Note: Carnmoney Hill lies within the Metropolitan development limit and is therefore considered in this section.

Objections 351 and 529 - Lands south of Ballyduff Road or Brae

Objection 529 relates to a large irregular shaped site to the rear of the FG Wilson factory extending uphill as far as the former dump. The objection sought a housing zoning on the lands. The site forms an extensive part of the attractive slopes leading up to Carnmoney Hill. Ballyduff Road provides a strong definition for the boundary of the AOHSV in this immediate area. We consider that housing would not be appropriate on these elevated lands within an AOHSV. The former dump appears to be in the process of restoration and is at a higher level than the site.

We have set out our conclusions on the Plan Strategy, the Housing Strategy and the release of housing land in Part 1 of our report. We do not understand the objector's point about allowing more houses in the countryside, in any event. The site is in the midst of Metropolitan Newtownabbey, close to factories and employment sites. Zoning the site for housing would not therefore be akin to allowing housing in the countryside, which appears to be what the objector is advocating. We see little evidence of dumping on the site or broken fencing. Even if there were such problems, they would not overcome our concerns with nor justify the release of the land for housing. We consider that the Plan should not be changed as a result of this objection.

Objection 351 relates to a dwelling in the midst of the above lands. The objection was to the inclusion of the dwelling in LLPA designation MNY 44. It also refers to the AOHSV, but does not state an objection thereto. MNY 44 covers the whole of the AOHSV of Carnmoney Hill. The objection did not set out why the site was not worthy of inclusion within the LLPA. Its exclusion would leave a small gap in the extensive area covered by the designations. We consider that would not be logical or warranted and recommend no change to the Plan.

Objection 2950 - Lands at Fernlea Lane

The site consists of an open grassed area north of Fernlea Park and some fields to the west. It slopes up from Doagh Road and is enclosed by Fernlea Lane. There are two dwellings east of the lane and two dwellings at its end, which are aligned with the properties in Treetops Lane. The objection sought the exclusion of the site from the AOHSV and AOCMD and its inclusion within the SDL as a DOS (mainly residential).

The site forms part of the attractive slopes leading up to Carnmoney Hill and a valuable open link to the former from Doagh Road. The dwellings on the lane do not detract from this open character to any great extent. We consider that the site should therefore remain within the AOHSV, as it makes a valuable contribution to the setting of Carnmoney Hill. It follows that the site should not be designated as a DOS in our
opinion as development would not be acceptable on the site. We have set out our conclusions on AOCMDs in Part 1 of our report.

**Objections 1761, 2949, 209, 3585, 3113, 3118**

**Background:** Newtownabbey Borough Council entered into various discussions with the Department and objectors in respect of sites 1761, 2949, 209, and 3113. The discussions centred around the transfer of private lands on Carnmoney Hill to the Council in the event that development were to be permitted on parts of the objection sites. The transferred lands would become part of a country park managed by the Council and the Woodland Trust. Correspondence to the Department from the Council dated April 2008 indicated its willingness to accept the proposed land transfer of 63.99 hectares of land in respect of sites 209, 2949 and 3113. Papers from the Council indicated its view that the benefits accruing from the land transfer would outweigh the visual and landscape impact of the proposed new housing. Further correspondence from the Department in June 2008 indicated that a meeting had been held with the Council and that an agreement had been reached in respect of objection site 1761; in this case 15 hectares of land would be transferred to the Council if housing were to be permitted on 2 hectares of the objection site.

At the Inquiry objections 3113 and 3118 were withdrawn.

Objection site 1761 wraps around the eastern and southern sides of the MNY 02/26 housing zoning, which has been developed. It comprises an area of rough, overgrown land just off Ballyduff Road, and grazing land to the south of same. The northern portion of site 2949 (2949/A) comprises part of a row of fields to the south of The Brackens and east of Fairhill Crescent. Field boundaries are defined by hedges and small trees. An undeveloped housing zoning (MNY05/04 abuts the northwestern boundary of the site as does a proposed Belfast Hills Access Point (NY 06/06). All of the lands slope steeply upwards towards an escarpment to the south. A quarry site is located on higher land to the southeast of site 1761. Objection 1761 sought inclusion of the site within the adjacent housing zoning MNY 02/26 and exclusion from the proposed AOHSV and AOCMD. Objection 2949 referred originally to exclusion from the SDL and sought housing on two areas of land as well as “recreational use” on adjoining lands. The objection was also to the proposed AOHSV and AOCMD.

Objection site 209 (as reduced) comprises an area of agricultural land abutting ‘The Cairn’ housing development. The land has a narrow frontage to Glebe Road and rises from southwest to northeast. The northeastern boundary of the reduced site is undefined on the ground. The southeastern boundary with site 2949 is a post and wire fence. The objection sought zoning of the site for housing and exclusion from the proposed AOHSV and AOCMD. The southern portion of site 2949 (2949/B), as reduced, comprises road frontage portions of three fields at Glebe Road and around 50% of a field located to the rear of a small clachan-style housing development opposite Glebe Manor. The field boundaries are defined by hedges. The land rises away from the road, towards the summit of Carnmoney Hill, which lies several hundred metres to the east.
Objection 3585 related to a dwelling and surrounding land extending to 2 acres at No.41 Glebe Road. The land rises from south to north. The site contains various trees and hedges. A small housing development lies at the roadside immediately to the north. The objection sought inclusion of the site within the settlement for housing.

The sites fall within the proposed Carnmoney Hill LLPA MNY 44. None of the objections raised this as an issue and the LLPA must therefore be confirmed in respect of the subject lands. As we have stated elsewhere, the presence of an LLPA does not automatically preclude development that would be sensitive to the features for which it was designated. With regard to 209, 1761 and 2949, all of the sites are visible from both the immediate locality and from vantage points some distance away. We share the counter objectors’ concerns in respect of the visual impact of housing on all of these sites, given their rising topography. The gradient of 2949/A and 1761 is particularly steep and there is potential for residential development to have a detrimental impact on the MNY 44 LLPA and the setting of Carnmoney Hill, which is justifiably also designated an AOHSV in the Plan. With regard to site 1761 in particular, we agree with the Department’s analysis that development should not be permitted to extend into the area hatched green on the attached Plan No. 4. With regard to sites 209 and 2949/B, we acknowledge that the reduced sites would restrict development to the lower slopes. However, we would reiterate our concerns in respect of possible impact on the LLPA and the setting of Carnmoney Hill. In addition, notwithstanding the presence of ‘The Cairn’ and other sporadic residential development on its eastern side, we consider that Glebe Road presently represents a logical visual and physical limit to development along the majority of its length. Weighed against these concerns, we must take on board the Borough Council’s views. We consider that there would be considerable benefit involved in the transfer of almost 80 hectares of land from private to public ownership for recreational use. Long term management and protection of a very large part of Carnmoney Hill would be ensured. Should the objections fail, it is probably highly unlikely that the lands offered for transfer would be available for public use. On balance, we consider that the benefits accruing from the inclusion of the sites would outweigh the potential detrimental environmental impact of their development, which can be mitigated to a degree through careful design. Clearly, it would not be appropriate to retain the AOHSV designation on the zoned lands. Undisputed evidence that access to site 1761 is only possible via site 2949/A is indicative that a single new zoning is appropriate, incorporating those two sites.

With regard to site 3585, there is no offer of land transfer on the table. Development on the land would be highly visible from the south, encroaching into the very open character of the southern part of Carnmoney Hill. We consider that inclusion of the site would have an unacceptable impact on the setting of the Hill and that there are no factors to outweigh this conclusion. Its inclusion would not represent rounding off, as claimed in the objection. The site should remain in the AOHSV. We recommend no change to the Plan in respect of this objection.

The Department suggested various KSRs in respect of sites 209, 1761, and 2949. We would agree that a density restriction is appropriate on all of the sites, given their sensitive location. The figure of 10 dwellings per hectare is not unreasonable; however, we consider that the Plan should allow for higher density if it can be demonstrated that it will not result in an unacceptable visual impact. We consider that the height of, and finishes to, the dwellings are matters that can be addressed at the design/development
management stages; clearly, respect for the sites’ context, including the LLPA, will be a material consideration. Landscaping, site layout, and management schemes are matters covered by the provisions of regional policy. The treatment of the interface between the housing and the land transferred to the Council, including buffer planting, is a matter for the design process. Given the sloping nature of the sites it is important to draw attention to the need to avoid retaining structures. Provision of access from the housing to the Carnmoney Hill country park is desirable and should be the subject of a KSR. Transfer of the agreed lands to Newtownabbey Borough Council is clearly a critical matter, requiring to be addressed by a KSR; whether this is achieved by means of Article 40 agreements or some other method is a matter for the Department. Other suggested KSRs in respect of flood risk, access, infrastructure, and flora and fauna surveys are unnecessary. If archaeological remains exist on the land, a survey can be required through the development management process.

**Recommendation**

We recommend that:

- Site 2949/A, as indicated on the attached Plan No. 3, and site 1761, as indicated in cross-hatching on the attached Plan No. 4, are excluded from the AOHSV and zoned as a single housing zoning subject to the following KSRs:
  
  o Housing development shall be a maximum gross density of 10 dwellings per hectare unless it can be demonstrated that a higher density will not result in an unacceptable visual impact on Carnmoney Hill or its landscape setting.
  
  o Retaining structures shall only be included in exceptional circumstances, and where included they shall not exceed 1.5m in height.
  
  o Access to the adjacent public land at Carnmoney Hill shall be provided, subject to agreement with Newtownabbey Borough Council.
  
  o No planning consent shall be granted on any part of the zoning until the agreed transfer of land to Newtownabbey Borough Council has been secured. In the case of site 1761 this shall include all the land shown hatched green on the attached Plan No. 04.

- Sites 209 and 2949/B as indicated on the attached Plan No. 3 are excluded from the AOHSV and zoned as a single housing zoning subject to the following KSRs:
  
  o Housing development shall be a maximum gross density of 10 dwellings per hectare unless it can be demonstrated that a higher density will not result in an unacceptable visual impact on Carnmoney Hill or its landscape setting.
  
  o Retaining structures shall only be included in exceptional circumstances, and where included they shall not exceed 1.5m in height.
  
  o Access to the adjacent public land at Carnmoney Hill shall be provided, subject to agreement with Newtownabbey Borough Council.
  
  o No planning consent shall be granted on any part of the zoning until the agreed transfer of land to Newtownabbey Borough Council has been secured.
**Land at Doagh Road**  
*Objection 1425*

The objection relates to a site bounded by the Belfast to Coleraine railway line, the MNY 07 employment zoning, Doagh Road and Carnmoney Road North. It contains two large buildings, one of which is vacant, and another which appears to be in commercial use. There are two accesses to the site via Carnmoney Road North and Doagh Road. The objection sought zoning of the site for housing. The Department's final position at the Inquiry was that this would be acceptable. The site lies adjacent to a very substantial, largely undeveloped, employment zoning. The Department indicated that the inclusion of only part of the site within MNY 07 was a mapping error.

There is no evidence that the loss of the site to the commercial sector would result in a shortage of employment land in the locality. Given the need to identify additional housing land in Newtownabbey, we have no reason to disagree with the Department’s stance and recommend accordingly.

We consider that the KSRs suggested by the Department in relation to access, TA, and an Article 40 agreement are unnecessary, given that those matters are addressed by regional policy. This site is within the urban footprint and the objector indicated that a KSR specifying minimum density of 25dpha and maximum of 40 dpha was acceptable. We consider a minimum density to be appropriate but see no need to specify a maximum, given the site’s context; this would be a matter for the development management stage. We consider that provision of a landscape buffer on the western site boundary is essential, where the site interfaces with MNY 07. Other boundary treatment is a matter for the design process.

**Recommendation**

We recommend that the site is zoned for housing, subject to the following KSRs:–

- A landscape buffer, 5m in depth, shall be provided along the western boundary of the site.
- Housing development shall be a minimum gross density of 25 dwellings per hectare.

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**Land to west of Elmwood Grove**  
*Objection 1736*

The site is bounded by the A8(M), housing zonings MNY 04/10 (developed) and MNY 05/18, and the Elmwood Grove housing development. The site contains a derelict dwelling and outbuildings. The objection sought zoning of the site for housing; the Department considered the site suitable for such and suggested various KSRs.

We have no reason to disagree with the Department’s position, given the surrounding land uses. We recommend accordingly.
With regard to the suggested KSRs, we consider that bullet points 1, 4, 5, 6, and 7 are matters that are either dealt with by regional policy or can be addressed through the design/development management process. Given that the site is within the urban footprint, the suggested minimum development density is appropriate. We see no need for a maximum density as this will be determined at design stage. Access to the site could be achieved either through the Wood Cottages development on zoning MNY 04/10, or through the undeveloped MNY 05/18 zoning. We note that, whilst KSRs attached to other zonings in the area refer to the submission of TAs, none refers specifically to a need to consider the impact of other zonings. We do not see why the subject site should be treated differently. We note also that submission of a TA is a matter covered by regional policy.

**Recommendation**

We recommend that the site is zoned for housing, subject to the following KSR:-

- Housing development shall be at a minimum density of 20 dwellings per hectare.

**Land at Hydepark Road**

*(Objections 3195 and 3196)*

Sites 3195 and 3196 lie within the proposed SDL in the draft Plan. They are not subject to any zoning therein. Site 3196 fronts onto Hydepark Road, is overgrown in parts and contains various derelict buildings. Site 3195 has a short frontage to the road, contains several occupied buildings, and is currently in use for commercial purposes. The sites are separated by Hydepark Lane, which runs towards rural properties to the south. The Hydepark Manor housing development lies to the northwest of site 3195 and another estate known as Mill Grange lies opposite the site’s road frontage. There is an area of existing employment across Hydepark Road to the east of site 3196. The objections sought identification of both sites as DOS, mainly residential.

The Department considered that site 3196 would be suitable for housing. It argued that site 3195 should not be so zoned, given the existing commercial use. It was submitted that the KSRs suggested for objection 3194 should also be attached in respect of site 3196.

We have already concluded that land in beneficial use should not be zoned as a DOS; this situation pertains in respect of site 3195. We see little benefit in zoning a DOS on a peripheral site such as 3196. Given that sites 3195 and 3196 lie within the draft Plan’s SDL, the only issue we need consider in their respect, is whether or not they should be zoned for housing, which is, essentially, what the objector sought.

We are not convinced that there are insurmountable problems in respect of access to either of these sites. We do not disagree with the Department’s position in respect of site 3196. Residential development thereon would be an appropriate and acceptable land use. We understand an application for same had been submitted but are unaware of the outcome. The Plan is the mechanism for determining appropriate zonings. Site 3195 was not zoned by the Department for employment use in the Plan and there is no evidence that the loss of the site to the commercial sector would result in a shortage of...
employment land in the locality. There is, however, a need to identify additional housing land in Newtownabbey to meet the uplifted HGI. Ideally, it would be beneficial if this can be zoned within the existing SDL. Given this, we consider that there is merit in zoning site 3195 for housing. This would rationalise land use on the southern side of Hydepark Road at this location. Given the circumstances it would be appropriate for two separatezonings on the sites.

We are not persuaded that any KSRs are required in respect of the sites. All relevant matters are either dealt with by regional policy or can be addressed at the design/development management stage.

**Recommendation**

We recommend that sites 3195 and 3196 are separately zoned for housing.

**Land to east of Greenacres development, Glebe Road**

(Objection 3512)

The site is a narrow, fenced off, sliver of disused land between The Greenacres development and ‘The Cairn’, off Glebe Road. The site slopes markedly downwards from north to south, as does adjacent land. A hammerhead in Greenacres abuts the site. The objection sought zoning of the site for housing. We were advised that a consent for 9 dwellings on the site had been granted. The Department indicated that it would not be averse to a zoning on the site and suggested various KSRs.

We see no need for a housing zoning on the site, given the planning history, which has established that housing is acceptable in principle. We recommend no change to the Plan as a result of the objection.

**Land Adjacent to Glenavna Manor (also to LLPA MNY 53, SLNCI MNY 39/08 and identification as open space)**

(Objection 3209)

The objection site is an elongated area of land adjacent and north-west of Glenavna Manor, a residential estate. The site comprises grassland with a wooded area at the northern end. There are pathways that run through the site, connecting it with the adjacent housing development to the west and land to the north and south. The Three Mile Water River runs along the north-eastern boundary of the site. There is a steep grass bank forming the western boundary and mature hedge forming the southern. The land slopes downwards across the site in an easterly direction towards the river. The land is zoned in the draft Plan as part of Three Mile Water LLPA MNY53, the Three Mile Water SLNCI MNY39/08 and shown as existing open space. A number of trees within the site are protected by a Tree Preservation Order.

We note that the site has not been developed. It remains an integral part of a wider green space, stretching from Mossley Mill almost as far as Shore Road. A Community Greenway runs along its full length. Despite its slightly run-down appearance, we
consider that the site still possesses considerable merit in terms of visual amenity and value to nature conservation. Irrespective of the previous appeal decision, which was based on the particular circumstances of that case, we consider that the site should continue to be identified as existing open space in the Plan. On the basis of the evidence before us, we find the LLPA and SLNCI designations warranted. We recommend no change to the Plan.

**Land at Circular Road**
*(Objections 866, 2781)*

Objection 866 related to part of the land adjacent to No 1 Circular Road which has the benefit of planning permission for a housing development. The objection was that the land was not zoned for that purpose in the Plan. The extant permission, for 7 dwellings on the eastern part of the subject land, was approved on appeal after the draft Plan was published. This permission has not been implemented but nonetheless represents a housing commitment. However, the approved number of units falls below the yield threshold of 10 or more dwellings which is the benchmark for sites to be specifically identified as a housing zoning in the plan. On the basis of consistency, it is not appropriate that the extant permission is identified as a housing zoning. We recommend no change to the Plan in respect of this objection.

Objection 2781 related to all the undeveloped land abutting No 1 Circular Road including the portion which has had the benefit of planning permission. All of this land was the subject of the planning application and subsequent appeal. As the trees on that part of the land closest to Circular Road are the subject of a TPO, it was determined in the appeal decision that the development potential of the site should be restricted to the eastern part of the site and was conditioned accordingly. It would therefore not be appropriate to zone all of the subject lands for housing. We recommend no change to the Plan.

**Land at Mossley Mill**
*(Objection 2953)*

Newtownabbey Borough Council sought that land at Mossley Mill be zoned for housing and not open space. Based on the information contained in a letter from the Council to the Department (dated 3 November 2003) and attached to the objection, reference was made to an area of land outlined in red. However, no plan was submitted to identify the objection site although it was described as being contained between Antrim/Bleach Green railway line and the Three Mile Water River. This described location is an area of identified open space which falls within Designations MNY 53 Three Mile Water LLPA and MNY56/01 Abbey Green, Monkstown to Cavehill Community Greenway and within the Three Mile Water SLNCI. However, the Department’s evidence relates to Designation MNY 49 Mossley Mill and is not helpful in consideration of this objection.

The Council is the statutory provider of open space in the area and stated that it acquired the land in question in 2000 to enable the Newtownabbey Way to be linked through the site. Apart from this role of linking other open spaces, the Council expressed concern that the land does not offer significant opportunities for sporting,
recreational or amenity enjoyment given its location and limited access to other areas. However, from our observations, we note that the land connects via an existing informal pedestrian path from the Lakeview housing development to the west through to the Manse Road to the east. While the site is an area of varying gradient along the Three Mile Water River, it features mature trees with areas of open space which provide a pleasant area of amenity space. The houses in the Ravensdale housing development to the south back onto and overlook part of the subject land. We consider that the loss of this area of open space is not acceptable in the context of the Council aspiring to provide a linkage and securing a Community Greenway as identified in the Plan. We cannot sustain this objection to the principle of the site being identified as open space and recommend no change to the Plan.
EMPLOYMENT

Invest Northern Ireland Objection to Requirement for Concept Masterplans (CMPs) (Objection 3824)

The objectors raised this as a general issue. We address it here because it was primarily raised in relation to the new employment zonings in Newtownabbey (MNY 07 MNY 08 and MNY 09). The concern was how masterplans could be drawn up and implemented in relation to large sites in multiple ownership where development is likely to take place in phases. They suggested that a development framework approach should be considered within which complementary masterplans could be developed for each phase.

Paragraphs 4.17 and 4.18 of Planning Policy Statement 4 – Planning and Economic Development set out the importance of CMPs to ensure that quality development is provided. The approach to the involvement of differing land owners is also set out. In the case of these zonings, their scale, location and significance means that comprehensive planning is essential to ensure a high quality development. Piecemeal development would be completely inappropriate. INI appeared to accept this and suggest an alternative approach. It is of little importance what the controls are called (CMP or development framework). It is the outcome in terms of the quality of development and provision of the necessary infrastructure that is important. We shall address a particular issue in relation to Zoning MNY 07 below. We consider that in general CMPs are appropriate for large new employment zonings.

MNY 07 – Lands at Global Point/Ballyhenry (Major Employment Location)

We have set out our conclusions on objection 1425 above, which have minor implications for the eastern boundary of the Zoning between Doagh Road and the rail line.

Glenabbey Church (Objection 824)

The objection relates to the site of a small former church in the NE part of the Zoning, adjacent to the Corr’s Corner roundabout. The church is disused and in a derelict condition. The access is little more than a track. The objectors’ church is nearby on Ballyclyraig Road and is zoned for housing in the Plan (MNY 04/08). They claim that the site is too constrained for their needs. They applied for a site in the countryside, which was refused planning permission on appeal in March 2003 on Green Belt grounds. They are now interested in the objection site and have had discussions with the owners.

The RDS identifies Newtownabbey as a major employment development opportunity and a growth location and specifically refers to Ballyhenry. In this context, MNY 07 is a very important employment zoning – one of 4 Major Employment Locations (MELs) in the Plan. It is in a very good location with close access to the A8 and from there to the M2 Motorway and Larne port in the other direction. The church site has lain derelict for some years and is being marketed for sale as an employment site. The objection site is
quite large and the suggested use could have implications for the remaining employment land. The objectors’ church continues to operate from the existing site on Ballycraigy Road in a range of buildings with car parking. The need for a new church has not been demonstrated and in any event, the perceived need does not specifically relate to the objection site. The importance of the Zoning outweighs the objection and former use of the site and we recommend no change to the Plan.

**Invest Northern Ireland Objection (Objection 3824)**

Plan Amendment No. 1 amended the Key Site Requirements for this zoning to require separate CMPs for each of Zones A and B within the site. This has addressed one element of the INI objection. The planning history of the site and the fact that INI have prepared a CMP and provided landscaping thereon are not matters for inclusion into an Area Plan, as they are detailed information. The objectors did not clarify what necessary infrastructure is not available to allow development. BMTP includes several strategic road improvements in this area, some of which have been already implemented.

The Department clarified the range of uses that would generally be acceptable on all employment sites and we have recommended the inclusion of this list in the Plan strategy. The Department also confirmed that the Class B1 (a) floorspace limit on this site should be increased to 5,000 m². We have accepted in paragraph 7.4.9 of Part 1 of our report that this figure is appropriate and recommended accordingly. The Department should ensure that this figure is amended as we have already recommended. INI did not specify a figure and we consider that the above measures are as far as the Plan should go to address the concern.

INI also objected to the overlap between the Zoning and Designation MNY 43 - Campbell Road/Manse Road LLPA. The overlapping area comprises a reasonably flat long strip of land planted in semi-mature trees. Several housing estates and a rath lie adjacent to the site. The basis for the objection was confined to the area being an integral part of the Zone A Business Park. It was argued that the inclusion of the land within the LLPA designation is a duplication of the MNY 07 key site requirements pertaining to landscaping and that the objection site has already been landscaped and planted as part of the landscaping plan for the industrial estate. Confusingly, the objection also sought the removal of the area from MNY 07.

The objection site with its existing planting provides an effective screen between the existing dwellings and the remainder of zoning MNY 07. It is also an attractive feature that provides a landscape and visual amenity as well as having nature conservation value. Whilst there is an overlap in terms of the employment zoning and the LLPA designation, we consider that the site should remain within MNY 07 given the screening function it provides in relation to the zoning. Given that the planting has already been carried out, the LLPA designation is unlikely to in any way impede future development on MNY 07. We recommend no change to the Plan.
MBA (Objection 3408)

The site, as identified in the original objection, comprises a number of fields located between residential properties at Nos. 610 to 626 Doagh Road and the railway line. A further submission identified the site as all of the MNY 07 zoning north of the railway line. We normally could not consider land outside the site identified in the original objection. However, in this case we note that the wording of the objection does not confine the issue of KSRs solely to the land identified in the attached plan. The objection sought the deletion of the last KSR referring to an Article 40 agreement. A new KSR was suggested to allow for the development of the site to provide 'live-work units' in Zone B of MNY 07. The objector accepted that a CMP should be prepared for Zone B, which addressed another element of the submission.

The Department indicated that reference to an Article 40 agreement in the final bullet point could be deleted and the matter could be dealt with in the amplification text. The objector’s view was that the issue of an Article 40 agreement was a development management matter. We note that the KSR in the draft Plan states that the agreement “may” be necessary to ensure delivery of landscape management proposals. This reflects the lack of certainty with regard to the need for an Article 40 agreement. It recognises that other mechanisms may exist to achieve the same end. We do not consider that the KSR is necessary as it merely states the obvious; for the same reason we see little point in referring to the issue in the amplification text.

With regard to the issue of live-work units, we note the Department’s view that around 10% of Zone B could be developed as such. It considered that the extent of the live-work use should be identified in the CMP. The objector’s view was that the live-work use should be permitted on 50% of Zone B.

We have referred to the importance of the Zoning as a MEL above (objection 824). Zone B represents a sizeable portion of MNY 07. As an employment resource it may be of critical importance in accommodating future employers. This could involve ‘nuisance’ land uses, irrespective of the objector’s point that that MNY 07 was not intended to accommodate heavy industry. Whilst we accept that many modern industries do not fall into this category, and could co-exist with housing, we have no indication from the parties that the live-work uses can be accommodated without prejudicing the future function of Zone B. It is not acceptable for the matter to be left to the CMP stage. We accept that live-work developments exist in Great Britain; however, we note from the objector’s evidence that it is an evolving issue, lacking clear policy or guidance. We acknowledge that changes in the local, national and world economies may require new thinking in terms of future employment needs. However, the subject issue should have been raised as a strategic matter, seeking live-work units as one of the acceptable uses on employment sites; this would have enabled us to consider a tailor made policy for the BMA. It is not appropriate for the issue to be raised as a site-specific objection. We do not agree with the objector’s arguments in respect of the suggested new KSR. We recommend no change to the Plan.
**Objection 766**

The objection relates to a small field and two dwellings at the eastern edge of the Zoning. The City of Belfast Playing Fields are situated on the opposite side of the road. The dwellings occupy the road frontage of the site. There are several agricultural buildings to the rear. The northern boundary is defined by mature trees and the western is marked by a mature hedgerow. There is a small stream along the SW boundary.

The objection was to the inclusion of the site within the employment zoning. It did also refer to HOU1 and on this basis the Department conceded that the site should be zoned for housing together with the lands to the south that we reported on above (objections 757, 759, 2529/9 and 3498 refer). We agree that the objection can be considered as seeking housing on the site.

We shall consider this objection on the basis that we have recommended that the sites to the south should be included within the SDL and zoned for housing to meet the revised HGI. The site relates well to the lands to the south and is already partially occupied by dwellings with outbuildings. The loss of this small portion of MNY 09 is not considered to be fatal by the Department. In these circumstances, we consider that the site should be included with the lands to the south in the housing zoning we recommended earlier. Obviously individual Key Site Requirements are unnecessary as this site would only form part of the overall zoning.

**Recommendation**

We recommend that the site is included in the housing zoning with objection sites 757, 759, 2529/9 and 3498.

**Objection 3633**

The objection principally related to major expansion of the small settlement of Roughfort, which we address below. It also related to that part of the Zoning SW of the Ballymartin Water (designated as LLPA MNY 42 in the Plan). The objection sought the removal of these lands (the site) from the Zoning because it would cause local coalescence. The majority of the site is occupied by a large manufacturing premises owned by Brett Martin. The objectors claim that this business is historically associated with Roughfort and should have been recognised as a major area of existing employment for Roughfort. We shall consider a separate portion of the Zoning on the northern side of Roughfort Road below.

The RDS identifies Newtownabbey as a major employment development opportunity and a growth location and specifically refers to Mallusk. The area is recognised as a strategic location on major transport corridors. The objection must be considered against this clear RDS policy direction. It is difficult to see the logic in the objectors’ arguments for several reasons. There is no objection to the majority of the zoning north of Ballymartin Water. We agree that the Water would have provided a good southern boundary for the zoning but for the fact that the existing factory occupies well over 50%
of the zoned lands south of the Water. The deletion of the site from the Zoning would not make any difference to the separation between Roughfort and the Metropolitan Area because of the existing factory complex on the western portion of the site closest to Roughfort. The difference between whether the lands are zoned as Existing Employment or Employment is surely a matter of semantics and of little practical relevance. The zoning is some distance from the SDL of Roughfort and the intervening lands are not part of the “subject lands” identified in the objection. The existing factory could not therefore be included within Roughfort as a result of this objection. The deletion of the site would not restore anything to Roughfort and we do not agree that this site is in any way related to that small settlement.

In terms of the impact on the LLPA: we note that it is excluded from the employment zoning and that the existing factory complex extends up to the edge of the water in any event. The Key Site Requirement related to access does refer to culverting of the water for a spine road through the site. This could mean that a small part of the water would be culverted in order to link the two parts of the zoning. We consider that the Department should clarify what is meant by the requirement especially as a sizeable portion of the objection site is developed already. The issue of pollutants has the potential to arise whatever happens to the objection site because of the existing use on the site and the fact that there is no objection to the northern part of the zoning. Pollution is addressed under other legislation anyway. We recommend no change to the Plan as a result of this objection.

**Objection 121**

This objection related to the former Star Rentals site (now vacant), which lies at the extreme western end of the zoning. It is separated from the Brett Martin factory by Craigarogan Road and there are some residential properties adjoining the NE corner of the premises. The lands in question lie north of the Roughfort Road and separate from the main site. The objection relates to northern portion of these lands that lie outside the SDL. The site appears to have been used for outside storage of containers and vehicles. The objection suggested a possible future intention to erect warehouse units on the site. We consider that Roughfort Road would have been a good boundary for this part of the zoning. However, as the Department has included some of the site to the north of the road within the zoning and SDL, it would be logical to also include the site because it has an identical character and use.

**Recommendation**

We recommend that the site should be included within Zoning MNY 09 and the SDL.

**Zoning MNY 12 – Quay Road**

(Objection 969/4)

The objection sought the removal of land from the zoning and its designation as open space. The site is an area of informal open space comprising a maintained grass area, mature trees and some scrub that lies adjacent to the shore. The site lies on the south-eastern side of Quay Road opposite Merville Garden Village. Adjacent and south-west
of the site lies a fenced-off vacant area with a tarmac surface now largely overgrown in weeds. Beyond that a series of dwellings fronts the road with larger shed type buildings to the rear, which are used for various retail and employment uses.

The objection site has an open space function and can be considered to be amenity green space under point (iii) of Annex A2 of Planning Policy Statement 8 – Open Space, Sport and Outdoor Recreation. We note the evidence supplied by the objectors showing the historic link between the site and Merville Garden Village. From visual inspection alone it is apparent the site does not have any existing employment use. Given the site’s nature and function as open space we agree with the objectors that this area should not be included as part of the zoning. We recommend that the land should be excluded from this zoning in the Plan. The objectors sought the zoning of the site as open space. The Plan does not zone existing open space, as we have discussed in Part 1 of our report. However, open space above 1 hectare is indicated for information only. The Department may wish to consider so indicating this site.

**Recommendation**

We recommend that the site is excluded from Zoning MNY 12.

**Zoning MNY 13 – Longlands Avenue**

(Objections 3825/43 & 51)

The NIHE objected to the zoning of this area of land as an existing employment zoning, stating that NIHE has obtained agreement with landowners and Newtownabbey Council to develop the site for social housing.

The site comprises several industrial buildings of varying size and design with yard areas situated off Longlands Avenue. One building is derelict with only its steel frame structure remaining, whilst a number of others are vacant and locked up. The remaining ones are occupied by industrial uses. The site adjoins existing housing on its southern and south-western boundaries, whilst other commercial uses including the rear loading yard for the Tesco Store in Abbey Centre lies to the east.

The Department’s evidence states that it agrees with the objector that the site should be rezoned for social housing, stating that part of the site already has planning permission for that purpose. We note the proximity of several other employment land zonings in the locality and agree that they represent an appropriate level of provision in the area. The objection site sits adjacent to existing housing on two sides, is dilapidated in appearance and under utilised. The site would be a very sustainable location for social housing and its use for that purpose would also contribute to regeneration of the locality. Given the shortfall in social housing provision in the Plan along with these other factors we consider that MNY 13 should be zoned for social housing.

**Recommendation**

We recommend that the Department deletes Employment Designation MNY 13 and zones the land for social housing.
**Zoning MNY 14 – Church Road**  
*(Objection 1860)*

The site comprises a large parcel of land situated on both sides of Church Road, Newtownabbey. The Valley Business Park, itself comprising a number of businesses including car sales, occupies a large portion of the zoning to the northern side of Church Road. Northgate information services, a warehousing and a distribution business also lie on this side of Church Road. The Bombardier Aerospace (BA) premises and an undeveloped area that is rough grassland comprise the part of the zoning that lies on the southern side of Church Road. The BA factory continues to operate on the site and has not been demolished as claimed in the objection.

The objection contended that the zoning should have been a Major Employment Location. It was argued that Major Employment Locations should not be confined to Greenfield sites that could take years to develop; existing employment areas should also be identified. The basis for Major Employment Locations is Diagram 5 of the RDS. This diagram schematically identifies 8 Major Employment Development Opportunities. We consider that none of these opportunities relate to this area. Two Major Employment Locations have been designated elsewhere within Newtownabbey (MNY 07 & MNY 08), which meet the needs of this part of the BMA. There is consequently no basis for designating the site or estate as a Major Employment Location.

The Department clarified the range of uses that would generally be acceptable on all employment sites and we have recommended the inclusion of this list in the Plan strategy. In respect of Class B1(a) offices, these would only be acceptable where specified. We have set out our conclusions on the office strategy and policies of the Plan in Part 1 of our report. We concluded that the Department’s portfolio of sites was broadly correct. The allowance for offices at Major Employment Locations was considered to be sufficient to cater for the modern demands for business parks as referred to in the RDS and PPS4. In terms of this site: the call centre use falls within the acceptable uses on all employment sites. There is also an exceptional clause in regional policy that would allow for applications for offices that cannot locate in a city centre or other identified location in the Plan to be considered. The range of uses that fall within Use Classes B1 (b) & (c) also give a reasonable degree of flexibility. There are several approved offices on the site. These were presumably approved under the previous BUAP office policies. They do not set a precedent for the designation of the whole site as an office location. The permission on the vacant land within the site was granted in 2004 and presumably has lapsed. We do not consider that the zoning should be amended to specify that Class B1 (a) offices would be acceptable.

We do not see the need to rezone the site as a mixed use site given the range of uses specified in the objection which are already acceptable in principle on any employment zoning. We have discussed office uses above. The fact that a small part of the zoning is undeveloped does not persuade us that the overall classification as an existing employment zoning is inappropriate.

We consider that there should be no change to the Plan as a result of this objection.
Zoning MNY 16 – Glenville Road
(Objections 715 & 881)

The site consists of the old Glenville industrial estate next to the rail line with the Eglantine Timber Products premises in front; Housing Zoning MNY 03/11 (which has been developed and occupied); a new building for business units adjacent to the access to MNY 03/11 (one unit is occupied) and the site of a former factory to the west of these units. The factory site has been cleared and a planned residential development is being advertised thereon. The remainder of the objection site is undeveloped land.

The Department confirmed that the site of the former factory on the western road frontage had planning permission for residential development and should be zoned for housing. NIHE had indicated that this site was suitable for social housing. The Department therefore considered that the former factory site and the adjoining business units in front of MNY 03/11 should be zoned for housing. The business units appear to be of recent construction and we would therefore question their inclusion within a housing zoning.

The undeveloped portion of the site appears to have been zoned as existing employment in error. The procedure on pages 59-60 of Volume 1 of the Plan was not followed. The land is not in use for employment purposes. The evidence was that it is unrelated to the adjoining industrial estate. It was not zoned for industrial purposes in the BUAP. The Department accepted that if there was no employment use on the land then it should not be so indicated in the Plan. We agree that there is no basis for the existing employment zoning on this portion of the site and consider that it should be zoned for housing as requested. This would complement the housing zoning and Departmental concession for further housing on the site. It would make efficient use of urban land and would yield the advantages offered by the objectors (discussed below).

The parties agreed that the existing industrial estate should be zoned for employment purposes. A buffer between the housing and employment zonings would be necessary. This leaves the Eglantine Timber Products premises, which is more akin to a retail use. We do not consider this to be existing employment and as the use continues to operate from the site, we recommend that it be left unzoned.

The key site requirements should address design measures to mitigate noise and disturbance and a buffer zone between the proposed housing zoning and the employment zoning. The Department sought a 3m wide buffer, whilst the objectors referred to one 5-8m in width. We prefer the objectors’ suggestion as it would afford more separation. Both objectors referred to the possibility of links to the Three Mile Water Park and LLPA to the rear of the site as a major advantage of a housing zoning on the site. We agree that the provision of pedestrian links through the site to the Park would be a benefit for the existing and proposed residents. These links should be secured by means of a key site requirement. There is no proposal to re-instate any former rail halt that may have been located nearby. This location is outside the site and therefore not part of the objection, in any event. The objectors comments seem to have been by the way of the site’s proximity to the halt and that re-opening halts was considered to be a good idea.
We agree that a minimum density of 20 dwellings per hectare is appropriate given the site’s location. The reference to the former factory site’s suitability for social housing was not reflected in the Department’s suggested key site requirements. We do not have any information on the planning permission that was granted on the site to comment further on this aspect, but would advise that the Department considers the possibility of zoning all or part of the site for social housing in the light of the shortfall we have identified in the social housing provision for the area. Other suggested requirements have been addressed in our general approach to same at the beginning of this report.

Recommendation

We recommend that:

- Zoning MNY 16 is reduced to relate to the Glenville Industrial Estate only.
- The adjoining Eglantine Timber Products premises should be excluded from the employment zoning and left unzoned.
- The Department should re-consider whether the business units in front of Zoning MNY 03/11 should be included in the housing zoning below.
- The remainder of site 881 (incorporating objection 715) be excluded from the employment zoning and zoned for housing subject to Key Site Requirements to address:

  - Housing to be at a minimum density of 20 dwellings per hectare.
  - The design and layout shall incorporate measures to mitigate any potential noise nuisance from the adjoining industrial estate including a 5-8m landscaped buffer along the relevant boundary of the site.
  - The design and layout shall provide for pedestrian access to the adjoining Three Mile Water Park and LLPA (MNY53).

Zoning MNY 18 – Glenwell Road
(Objection 2723/1)

This objection related to the lack of information in the Plan on what was acceptable on the site and the lack of key design considerations for zoning MNY18. It was also stated that given the proximity to existing residential development, a portion of the zoning (No. 2 Glenwell Road and its curtilage) related more closely to the adjacent residential development than the existing employment zoning.

Whilst the dwellings in Glengormley Park lie in proximity to the objection site, they do not read with the site and are accessed from a different road. The site reads with and lies within the grouping of industrial buildings that are accessed from Glenwell Road. No information regarding any planning approval on the site for residential development was provided. The site is used for employment purposes and we are not persuaded that it should be rezoned for housing or that it represents a windfall opportunity in these circumstances.

Our recommendations on the Employment Strategy are contained in Part 1 of our Report. We recommended that the Strategy include a list of acceptable uses on all
employment zonings, i.e. Use Classes B 1 (b) and (c), Use Class B 2, Use Class B 3 and Use Class B 4. Consequently no key site requirements for the site are necessary. We recommend no change to the Plan.
TRANSPORTATION

_STRATEGIC ROAD PROPOSALS_

Proposal MNY 22 – M2 Widening between Sandyknowes and Greencastle
(Objections 702/4 & 2145/18)

This scheme has been completed and therefore these objections are now redundant.

Proposal MNY 23 – Widening of A2 between Jordanstown and Carrickfergus
(Objection 2145/17)

There was no objection to the proposal in principle. The objection related to the impact on the built heritage and landscape character of the area. This road proposal would be subject to the full statutory process where the impact on built heritage and landscape would be assessed, as well as landscaping of the proposed road. There is no need for the Plan to mention these matters that are so addressed and no change is required to the Plan.

Proposal PA06 – New Junction on the M2 north of Sandyknowes
(Objections 3905, 3914, 3924, 4081, 4091, 4143, 4148, 4150, 4180, 4187, 4189, 4192, 4198, 4208, 4211, 4225/7, 4253, 4254, 4257/6, 4258, 4260, 4263, 4264 & 4269)

This is a strategic road scheme introduced in Plan Amendment No. 1. It consists of the new junction on the M2 and a new link road between Mallusk and Corr’s Corner on the A8. The objections received were to this latter element – the link road. The proposal is referred to in the RTS at Figure 5.5 but is not included in the Regional Strategic Network Transport Plan. The scheme is referred to in BMTP at paragraph 6.28. This reference relates to a statement that once modifications to the Sandyknowes roundabout have been completed, more significant improvements will be required; these will be implemented outside the plan period (i.e. after 2015). The new junction is a means of providing greater capacity at Sandyknowes. The Department considered that this scale of improvement will be required very soon after the plan period in order to cater for demand and to support the full implementation of the Mallusk and Global Point/Ballyhenry major employment zonings. Paragraph 70 of PPS13 (and paragraph 4.9 of PPS3) requires development plans to protect land necessary for the implementation of transport schemes. This will include the protection of routes for transport infrastructure beyond the development plan period where these are of strategic importance. However, the paragraph does state that the RTS and Transport Plans will identify and prioritise the schemes and Transport Plans will provide locational detail for such schemes. Only then will the land required for their implementation be identified and protected in the development plan. Policy for the protection of identified routes is contained in Policy AMP4 of PPS3.

The Department’s case referred to the need for the closure of the Ballyhenry Road access onto Sandyknowes and consequent new link road to and roundabout on the A8. Ballyclare Road already provides such a link to a roundabout at Corr’s Corner and no new road linking Ballyhenry Road to the A8 was shown in the Plan or amendment. We
therefore fail to see the relevance of this measure to the issues under consideration. The benefits of the link road from the new junction to the A8 were not fully explained in terms of how it would remove traffic from the Sandyknowes junction or support the full implementation of the major employment zonings. The scheme would not be developed until the performance of short term measures to the Sandyknowes junction has been assessed. In response to concerns expressed by Invest Northern Ireland, the Departments confirmed that the funding for the scheme would be borne by the Government because this is a strategic road proposal. No developer contributions would be required. DRD confirmed that there was no question of linking the Proposal with the development of the MELs that were included in the amplification. The employment zonings are to be provided within the plan period, whilst the road proposals are to be provided outside the plan period. The development of the employment zonings may provide the rationale for the road proposal at least in part, the witness stated.

The Department’s justification for the route chosen was that the proposed link road closely followed the existing road and minimised lengthy routes through the countryside and disturbance to the Green Belt. Any alternatives would have to be considered but as long as this was the preferred route then it should be included in the development plan. We cannot comment on any particular suggested alternatives, but we consider that the proposal to include a protection line for this link road has failed to address potential alternatives. The proposal is not based on the RTS or BMTP schemes. The RTS refers to junction improvement at Sandyknowes only and BMTP also refers to the junction improvement and a new junction north of Sandyknowes in the text with a passing reference to Figure 6.2, which shows a dotted line around Sandyknowes on a large scale map of the BMA. There may be other equally cost effective routes that will not affect so many residential properties that have not been considered. Several such routes were suggested to the Department as part of the submissions to the Inquiry. The Department’s consultants responded that the line was chosen so as to follow existing roads as far as possible. This is one approach but other factors may outweigh its adoption. For instance several objectors referred to individual residential properties that were not shown on the Department’s maps, some of which had been in existence for 17 years. There may be many more properties affected than the Department has calculated. There was also some discussion about the precise location of the slip roads to serve the new junction and the impact of these on dwellings in the area. We consider that the rationale for this route has not been demonstrated. As the route may be subject to change we see no point in identifying the particular route shown in the Plan. There appears to be little benefit in identifying a protection line for a proposal outside the development limits of settlements, particularly if the route is subject to change. The Proposal will not provide certainty either as the route is subject to change. The Proposal should not be considered until the impact of existing improvements to the strategic road network and Sandyknowes have been assessed. For instance the widening of the M2 from Sandyknowes to Greencastle and the improvements to the Sandyknowes junction itself have not been assessed. From the evidence it appears that the need for the Proposal is also at least partly dependent on development on Zonings MNY 07 and MNY 08. No development has taken place on either as yet. In summary, we were presented with little evidence that the scheme was needed or that it would achieve the results that were claimed. Public investment should be directed at the resolution of the most pressing problems in the first instance and a key feature of the infrastructure programme is the prioritisation of schemes. If the need for a scheme
has not been demonstrated then its priority must be low. An additional point to consider is the impact of improvements to the public transport facilities in the area, such as for example the proposal to open a train station and park and ride at Templepatrick. In all these circumstances we recommend that the scheme is deleted from the Plan.

We consider that matters such as the effects on individual properties, quality of life, blight, severance of land, environmental impacts, access issues, public safety, public consultation and the effect on Ballycraigy Congregational Church (& churchgoers) are all capable of being addressed through the statutory procedures for approval of road schemes and we are unable to comment further on them. The negative impacts on the land within Zoning MNY 08 in one objector's ownership were not explained and we cannot comment further on this specific issue. The points made by Elevate in relation to the Strategic Environmental Assessment of Plan Amendment no. 1 and its proposals cannot be considered as this matter was not in the original objection. Objection 3924 states that if the Department were to confirm Proposal PA 06 then the lands between Ballycraigy and the proposal (to the south of the settlement) should be included in the SDL of Ballycraigy. We are recommending that the proposal be deleted from the Plan. However in any event, the matter is not an objection to the Plan Amendment because Ballycraigy SDL was not included in the Amendment and the issue cannot therefore be considered. Objection 3859 set out the perceived benefits of a full junction to enable traffic to access the M2 in both directions to Mallusk and Sandyknowes. This is a suggestion for the Departments to consider and is not a matter for our consideration because we have recommended that the Proposal is deleted from the Plan. The issue the provision of a park and ride site at Sandyknowes was considered in the BHA section of our Belfast Report (see pages 40 & 41 of that report).

**Recommendation**

We recommend that Proposal PA 06 is deleted from the Plan and maps.

**NON STRATEGIC ROAD PROPOSAL**

**Proposal MNY 24 – Hightown Road Link**

Consideration contained in our report on objections 398, 1720, 2529/4, 2965/128, 3622 and 3695 above.

**Proposal MNY 25 – Relocation of Rail Station, Jordanstown and Proposal MNY 26 – Park and Ride Scheme, Jordanstown**  
(Objections 503, 695/6, 1020 & 2859)

The proposals involve the re-location of the existing rail station several hundred metres to the NE of its current position together with an adjoining park and ride. The scheme is a proposal of BMTP, which provides more detail. A new access road would be constructed from the level crossing on the Jordanstown Road to the proposals, which will be traffic light controlled. No vehicular access is proposed from Lenamore Park or Meadowbank – this is clear from BMTP and Plan Amendment No. 1. Pedestrian links would be provided to the University (UUJ), Jordanstown School and local streets. The
Department stated that the proposals are necessary because of access problems and safety issues associated with the lack of space at the existing station, which is the 10th busiest in Northern Ireland. The Department stated that its present location is too close to the Jordanstown Road and the current access is unable to safely cater for peak levels of demand and there is insufficient space to drop off, or pick up, passengers.

The proposals would appear to offer an opportunity to assist with traffic problems caused by irresponsible parking by UUJ students and others because they will encourage increased use of public transport. The proposed station will be more convenient for UUJ and the recently re-developed Jordanstown School. The Department estimates that 60% of trips are associated with the University. The proposal will also provide facilities for parking, picking up and dropping off, which will be safer than the present situation, especially for school children. The effect on traffic on Jordanstown Road would be difficult to assess because there is already a station there. We consider that the benefits of encouraging use of public transport would outweigh any slight increase in traffic on this road. The existing station is located in close proximity to the level crossing. The benefits of the proposals would outweigh delays caused by right turns into the station. The proposals would be subject to the normal planning application process, where the details of the scheme would be provided and access issues addressed. The access road would result in the loss of some trees. The extent of the loss could be minimised by careful design. The tree belt along the rail line is reasonably wide and the loss of some trees would not therefore be as critical.

We agree with the Department that some users may have a slightly longer journey to get to the new station. Others may have a shorter journey with the pedestrian links that are proposed. As stated above, the station will be closer to UUJ and the evidence was that 60% of trips are associated with the university. The retention of the existing station once the new one is completed would not be practical. It is unfortunate that the Woodfield development does not have a link to Meadowbank/ Lenamore Avenue, which results in a much longer way round to get to the station. This is an established residential area and it is not feasible for the Plan to address the issue. Housing zonings MNY 03/18 and MNY 05/16 are separated by existing housing and could not be linked as suggested. In any event, this would only assist car users and not pedestrians. We consider that there should be no change to the Plan as a result of these objections.

**Jordanstown Schools, 85 Jordanstown Road**

(Objection 1372)

This objection was to Proposals MNY 25 & 26 for a relocated Jordanstown Rail Station and a new Park and Ride Scheme. It also related to Designation MNY 33 Lenamore ATC and Designation MNY 54 University of Ulster (UU) LLPA, as well as the identification of part of the site as existing open space in the Plan.

The objection referred to a proposed development for a new school and housing on the site. The Department confirmed that planning permission had been granted for residential development on the site in December 2006. We note that a large new school has been constructed on the site, which extends back to the stream along the rear boundary. This has replaced the main building and some of the crescent of buildings to the rear. The trees on the site are mainly along the railway line and the...
stream. A new wider access to the school has been constructed opposite no. 74 Jordanstown Road. This access will also serve the proposed residential development.

The sole objection to the park and ride and station proposals was that they would restrict the area proposed for housing. Both proposals are located outside the objection site and cannot therefore have any effect on the housing development on the site. The concern also related to a pedestrian/cycle link from the station to the University that was shown in BMTP running across the site. We consider that this is a matter of detail to be resolved later. It should not affect the principle of the Plan proposals. The benefits of the proposals in terms of improved public transport would outweigh this objection. We recommend no change to the Plan as a result of this objection.

The objection to Designation MNY 33 – Lenamore ATC was withdrawn in the statement of case. The objectors sought the Designation of the site for housing and a school in the statement of case. This matter was not referred to in the original objection and we cannot consider it any further. Given the planning permission for residential development and the fact that the school has been built, the point of such a zoning would appear to be moot anyway.

The objection to MNY 54 UU LLPA postulated that the school site may have been included as a result of a mapping error, as it was not mentioned in the important features of the LLPA on p. 73 of the Newtownabbey volume. The Department responded that the site was included because of the series of locally significant early 20th century brick buildings in a planned layout and their associated grounds, trees and other vegetation, which contribute to the views, settings and landscape character of the Jordanstown area and the adjoining Area of Townscape Character. The objectors’ sole concern was again that the Designation would be over-restrictive to the proposed re-development of the school.

The Department stated that the planning permission was granted on a large part of the site and that there were plans to re-develop the school, which would result in the loss of the locally significant buildings. The Department recommended that a large part of the objection site be removed from the LLPA. The stream corridor and the lands on the opposite side of the stream should remain within the Designation. We agree with this assessment and recommend accordingly.

Existing open space is indicated on the Plan’s maps for information only. The status of the land as open space is unaffected by whether it is so indicated or not. We note that only a very small part of the site adjacent to the stream is within the open space in any event.

**Recommendation**

We recommend that the Department amends the boundary of Designation MNY 54 to exclude the area shown hatched red on the attached Plan No. 5.
OBJECTIONS TO THE OMISSION OF TRANSPORT PROPOSALS FROM THE PLAN

Protection of former Rail Line from Kingsbog to Ballyclare
(Objection 2917)

The objectors suggested that the former rail line which ran from south of Ballyrobert to Ballyclare should be protected from any further development to enable a train service to serve the town if this is justified in the future. They acknowledge that there is no requirement for this line for the plan period, but feel that BMAP has a duty to look to the longer term. BMTP states that priority is given to the investment in the existing rail network in the period up to 2025.

In terms of this objection the issue as to whether the line should be protected as a disused line of strategic importance is also a function of how much of the former line remains intact. There are significant stretches that are no longer in existence and/or with buildings on the disused line. The Department pointed out that the former rail station in Ballyclare is now the bus station and adjoining lands were sold off in 1955. We could discern little remaining of the line between Ballyrobert and Ballyclare and no route across the A57. Dwellings have been constructed on the route in several places in Ballyrobert and Kingsbog. In these circumstances we consider that there is no justification to include this suggestion in the Plan.

Proposed New Station with Park and Ride Facility at Corr’s Corner
(Objection 2917)

The objection proposed a new rail station and park and ride adjacent to the rail line under the A8. It was claimed that this would be a much better option than the local bus-based park and ride at Sandyknowes. The station would replace the under-used Mossley West Station, in a better location on level track with adequate land for access and parking, it was argued.

The Department indicated that a new station and park and ride are proposed near Templepatrick, for which the land has been acquired. This is a strategic location adjacent to the M2 and would maximise park and ride on this key corridor. The Department considered that this would be an infinitely superior facility because onward transport would be provided by bus and train. It was argued that use of Mossley West will increase when higher train frequencies and other initiatives are delivered. We note that the objection is not a proposal of BMTP.

We have no information as to the precise location suggested for the objectors’ proposal. However, it appears to be within Major Employment Zoning MNY 07, which could have implications for the efficient use of that zoning. We have outlined the strategic importance of MNY 07 above and consider that any prejudice would be unacceptable. No details of access were provided. The A8 is a dual carriageway protected route and at a significantly higher level than Zoning MNY 07, so direct access could be difficult. The capital costs of the proposal would be considerable, notwithstanding the long-term possibility of the provision of a double track to Antrim, referred to by the objectors. This would necessitate works all along the line to Antrim and not just at Mossley West. The Templepatrick site has been acquired and would appear to be a realistic proposition in a
strategic location. This provision together with an increased frequency of services would address the objectors’ issues. A bus lane has also been provided as part of the M2 widening scheme. We therefore recommend that there should be no change to the Plan.

**Re-opening of the Rail Line from Greenisland to Monkstown**
(Objection 2917)

This appears to be related to a spur line linking the Bleach Green line and the line to Carrickfergus. The objectors made some perfectly valid points related to the provision of direct services from the north to Jordanstown. It was argued that commuter trains from Ballymena and Antrim could be diverted onto this line thus serving a new market, whilst main line services to Coleraine and Londonderry would use the existing line. The frequency of services to Whiteabbey, Greenisland and Jordanstown would be increased. Two new stations at Monkstown and “Knockagh” could be provided at minimal expense, it was claimed.

The Department did not categorise this as an objection and obviously did not respond. However, we were informed that there are plans to increase the frequency of services on all lines by 50% in the period to 2015 (BMTP refers). We have no information on the range of operational matters raised by the objectors such as whether there are commuter trains to Ballymena and Antrim. An examination of the timetable shows only two trains a day of this type. BMTP also states that new lines were considered as part of a review and it was decided that priority to 2025 should be given to investment in the existing network. We consider that this is an operational matter for the Departments and Translink to assess and accordingly we remit it to the Department.

**Suggested New Stations at Whitehouse and Fortwilliam**
(Objection 939/10)

The objector suggested that BMAP should give serious consideration to stations in these locations. These locations are not proposals of BMTP and so have not been included in the Plan. No detail of the precise locations has been provided other than that the proposed stations would serve Abbey Centre and Duncrue Industrial Estate respectively. In addition, no supporting information has been supplied to enable us to consider the objection further. We recommend no change to the Plan.
RETAILING

DESIGNATION MNY 27 – DISTRICT CENTRES

MNY 27/01 – Abbey Centre

The designation in the Plan includes: a main shopping centre building containing many comparison retail units; a new Tesco Superstore with several large units nearby including B & Q; several older units opposite the main centre and a large new Matalan unit to the south-east. There were objections to the principle of the Designation itself and objections seeking the inclusion of additional lands within the District Centre boundary.

We concluded in Part 1 of our report that city and town centres were the preferred location for major retail proposals. District Centres have a role to play but that should be a supporting role. We also acknowledged that some District Centres in the BMA contain a level of retailing that extends well beyond meeting a local need. We resisted calls to elevate them in the retail hierarchy and concluded that further development at Abbey Centre, Forestside and Bloomfield should be strictly controlled in order to achieve the strategic objectives of promoting the role of city and town centres. However, we did recognise that the Department had conceded all objection sites seeking expansion of Abbey Centre. This did not sit comfortably with their strategic submissions or their approach to objections seeking the expansion of other District Centres, but would appear to be a recognition of the planning approvals that had been granted around the Designation.

Objection to the Designation of the District Centre
(Objection 316)

The objection stated that the Designation should be deleted in order to protect local shops. Local shops are at the bottom of the retail hierarchy and are subject to competition and market forces as are all retail outlets. A designated District Centre cannot be deleted in order to benefit local shops, as there is no basis in planning policy for this. It is questionable that such action would achieve any benefit for local shops because the retail outlets in the District Centre would still exist whether or not it was designated in the Plan. The definition of the District Centre boundary in the Plan does not bring retailing any closer to the Merville Garden Village Conservation Area. It follows the main shopping centre car park and is separated from the Conservation Area by Longwood Road. Any impact from shoppers on the Conservation Area would happen whether or not the District Centre is so defined.

The objectors’ house is in the midst of the District Centre as defined in the Plan. We consider that it would be illogical to exclude the house as this would form a small island in the middle of the centre. Whilst we appreciate that this is the objectors’ family home, the land does not have to be in retail use at the moment to form part of the centre nor will the Designation affect their residential use of the property. In this case it is a function of the location of the property and the surrounding land uses that resulted in the Department including the site within the centre. The publicity of and consultation on the
Plan has followed legal requirements and in any event the objectors have made their views known on the Plan proposals.

We have considered the principle and precise amount of housing expansion in Newtownabbey in the strategic section of our report. This includes social housing. The identity of the developers is not a matter for the plan process. We fail to see the relevance of this to the Designation. The District Centre has been developed and accommodates several new stores. We therefore consider that any traffic problems are unlikely to be affected by the extent of the Designation. Regional policy requires all new development proposals to be assessed for their impact on transport and traffic. Operational issues and parking within the centre and outside dwellings are not development plan considerations. Planning policies on transport and sustainability would favour access to the centre by a choice of means of transport. This would support the provision of a rail halt to serve the centre, but there are no proposals for this in the Plan. The location of doctor’s surgeries, rents paid and the location of hospitals are matters for the Health authorities. Similarly the need for new fire or police stations is a matter for those bodies and if they had suggested any sites when consulted then the Plan could have accommodated them. The approval of a surgery in the Shopping Centre is a matter for Planning Service. We note that PPS5 does refer to the provision of complementary services in District Centres and that they are not confined to solely retail uses. The Plan cannot control the location of post offices.

We recommend no change to the Plan as a result of this objection.

**Objections seeking Expansion of the District Centre**

The Department conceded all objections at the hearing on the basis of consistency and that they had been developed or had planning permission without any restrictions on the type of retailing. This was a different approach than that taken in other District Centres in the BMA, notably Forestside, Connswater and Bloomfield, where the Department argued that retailing that did not meet a local need, should be excluded. However, at the Inquiry the Department stated that Abbey Centre was different to other District Centres in terms of floorspace and extent. It is the only one that generates a catchment and functions well beyond a normal centre, it was stated. The Department changed its stance on retail warehouses by recommending that they all be included within the District Centre in this case. The reasons for that were in the interests of consistency and because there were no restrictions on the planning permissions for sites outside the District Centre. In the absence of such controls it was then considered inconsistent to exclude these sites. We note that the planning history provided for several sites indicated that conditions had been attached to approvals on those sites. In these circumstances we cannot agree with the Department’s cavalier approach to the inclusion of such sites. Consistency must also take account of our strategic conclusions and the Department’s approach elsewhere.

We shall consider the individual sites below in the context of these concessions by the Department. We agree that the Abbey Centre is different to other District Centres in terms of size and floorspace. Objection site 2953/12 contains three separate sites suggested for inclusion. We briefly describe their location and the Department’s nomenclature here for clarity, as the objectors may not be aware of this. The
Department termed the lands around Marks & Spencer as Site A, the lands near the Door Store as Site B and the lands at Mill Road (MNY 11 in the Plan) as Site C. Objection 188 objected to the boundary as delineated on Map 2a, but did not refer to any additional land to be included. In the absence of the identification of any sites there is no further action that we can take in respect of this objection.

**Land to east of the Tesco store at Church Road**  
*(Objection 2760/47)*

A close examination of Map 2a shows that a narrow strip of land between the Tesco store and the road to the east has been excluded from the designation. It appears to be a minor mapping error. We consider that this piece of land should be included, but not the road itself, particularly as there is a housing zoning on the other side of the road.

**Recommendation**

We recommend that the narrow strip of land between the Tesco store and the road to the east within the objection site be included with the designated District Centre in the Plan.

**Lands at Glenmount Road/ Longwood Road**  
*(Objections 839/2, 968/3, 969/2, 2953/12 {Site A} & 3694)*

The sites included the Marks & Spencer and Lidl stores (that have been constructed and are operational) and a large social security office to the north of Lidl, accessed from Glenmount Road. The Marks & Spencer site and landscaping to the south-east along the boundary with Merville Garden Village was included in objection sites 839 and 968. Merville Residents’ Association objected to the planning application for Marks & Spencer, which was under consideration at the time of the objector’s submission.

The Department considered that the Marks & Spencer store provides mixed retailing, which meets the primary function of a District Centre. We appreciate its close proximity to the adjoining Conservation Area, but it has now been built and so must be assessed as it stands. We agree that it clearly should be part of the District Centre given its location and type of retailing offer.

Objections 839 and 968 suggested the inclusion of an additional portion of land that comprises landscaping between the road and the Conservation Area, south-east of the access to the store. This area was not included in objections 2953 and 3694. It is therefore open for us to consider whether it should be included in the Designation. We agree with the residents that this landscaping fulfils an important role in separating the District Centre and the Conservation Area. It is not part of the retailing use of the site. We consider that it should remain excluded from the centre and retained as landscaping. We do not agree that further landscaping on the other side of Longwood Road adjacent to the main shopping centre building can be included as part of the Plan; a development plan cannot require landscaping of an existing car park within an established centre that has been there for many years, notwithstanding the fact that there is a Conservation Area nearby.
Objections 2953 and 3694 also relate to the Lidl store and the Social Security office to the north. Lidl provides convenience retailing meeting a local need and is appropriate to include in a District Centre. This leaves the social security office, which is obviously not a retail use. The Department’s position was that the retail uses on the site justified its inclusion. Neither the objectors nor the Department made any reference to the office in their submissions. We were not provided with any information to the effect that the site has any retail planning permission and so its inclusion cannot be justified by that logic. However, PPS5 at paragraph 51 states that associated service and community uses are often appropriate and will normally be acceptable within District Centres. Therefore we conclude that on balance the sites should be included within the District Centre. We also agree that the exclusion of the roundabout to the south would leave an illogical gap in the Designation.

Objection site 3694 corresponds with 2853/12 site A and relates to all the land that we consider should be included within the District Centre and so our recommendation refers to that site. It includes the portion of 839/968 that we consider should be included.

**Recommendation**

We recommend that objection site 3694 be included within the designated District Centre in the Plan.

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**Lands adjacent to Longwood Road/Shore Road Junction**
(Objections 1022 & 2953/12 {Site B})

We agree with the Department that the Door Store premises (objection 1022) is located in such proximity to the main Abbey Centre that it should be included within the District Centre boundary. It is a relatively small unit surrounded by the Designation in the Plan and enclosed by Longwood Road on two sides. Its inclusion would round off the District Centre boundary to Longwood Road.

The units to the south (Starplan, CFC Interiors, Big Bargains and Funky Monkeys) also relate closely to the centre. Whilst they have their own access and separate car park, other units on this side of Longwood Road are within the centre. They are also relatively small units and we have no information on the restrictions on any planning permissions. Given the Departmental concession that these units should also be included within the District Centre boundary, we assume that there are no restrictions and recommend accordingly.

**Recommendation**

We recommend that portion of objection site 2953/12 (Site B) incorporating objection site 1022, be included within the designated District Centre in the Plan.
Lands adjacent to Mill Road/Shore Road Junction – also to Employment Zoning MNY 11
(Objections 189, 2953/12 {Site C} & 3686)

2953/12 Site C relates to the Homebase/ DW Fitness/ Creations/ Pets at Home block (which is MNY 11) and the Mothercare/ Dreams/ Home Bargains block. It would appear that the TK Maxx/ Discount NI block is within the Designation in the Plan, as is most of the car parking serving all these units. Objection site 3686 includes the above lands together with the Fitness First and Dunelm Mill units on the opposite side of Mill Road.

The two blocks of units in this site face into the District Centre and share a common access and car parking. We were provided with no information as to any planning restrictions on the type of retailing that can be provided on the site. The Department conceded that they should be included in the Designation. Given this concession we assume that there are no restrictions and recommend accordingly.

The remainder of site 3686 is separated from the District Centre by Mill Road. Fitness First is a gymnasium/ leisure use and Dunelm Mill is a retail warehouse. The Department stated that this site had planning permission for retail warehouses and should therefore be included in the Designation. This contrasts sharply with their approach in other District Centres. There is no policy support for individual retail warehouses or retail warehouse parks to locate in District Centres. Neither PPS5 nor our strategic conclusions in Part 1 of this report favour the inclusion of retail warehouses within a District Centre. Arguments that the units within the designated centre do not meet the criteria in paragraph 49 of PPS 5 do not justify inclusion of the objection lands which perform a different retail function. This site does not read as part of the large Abbey Centre because Mill Road separates them and the site has its own access and car park. The information that the site has planning permission for retail warehouses also distinguishes it from the other objection sites that we have considered thus far. In all these circumstances, we consider that the remainder of site 3686 should remain outside the Designation, with Mill Road as the boundary of the District Centre in this area.

Objection 189 related to Employment Zoning MNY 11. This Zoning appears to be completely re-developed for retail uses, which we have recommended be included within the District Centre. In these circumstances, we recommend that MNY 11 be deleted from the Plan.

Recommendation

We recommend that portion of objection site 2953/12 (Site C) be included within the designated District Centre and that Zoning MNY 11 be deleted from the Plan.

Lands at Longlands Road/Mill Road
(Objections 64, 348 & 3719)

For the Department’s information, objection 3719 originally related to the existing employment zoning MNY 13 as well as this site. The objector confirmed that this part of the objection was not being pursued in the statement of case.
Objection 64 relates to the KarKraft premises and objection 348 to the Nichrome site next door on Longlands Road. There are two parallel roads between these premises and the new roundabout at the junction of Longlands Road, Mill Road, Church Road and Old Church Road. They are surrounded by the District Centre on three sides. B & Q lies immediately to the west with car parks to the north. The Karkraft premises has a planning permission for retailing automobile equipment and accessories, which is its current use. The Nichrome site had an outline planning permission for a retail warehouse granted in 2007, which does not appear to have been implemented. This planning permission had conditions restricting the type of retailing and prohibiting any sub-division of the 1,300 m² unit approved. The Department conceded that the Karkraft site should be included within the Designation. This would appear to be consistent with their stance regarding sites with unrestricted retail planning permissions. There is also logic in this approach given its location. It would therefore be only logical to include the Nichrome site, which is sandwiched between Karkraft and B & Q. This would also round off the District Centre boundary to Longlands Road and Old Church Road.

The remainder of objection site 3719 relates to a roundabout, some car parking associated with retail units and then waste land that lies to the south of the District Centre. The Department considered that the site should be included within the District Centre because of its planning history. This portion of land does not contain retail units. The site had an outline planning permission for a retail warehouse granted in 2004, which does not appear to have been implemented. This planning permission had conditions restricting the type of retailing and prohibiting any units of less than 1,000 m². We were not presented with any evidence of other planning permissions on the site, despite the Department’s comment that there may be other permissions. We have concluded elsewhere that neither PPS5 nor our strategic conclusions in Part 1 of our report favour the inclusion of retail warehouses within a District Centre. We also consider that this land should not be included within the District Centre boundary given our comments in the strategic retail chapter that future expansion of the centre should be controlled. The reason for this is that the land contains no buildings or retail units and the planning permission referred to was restricted to retail warehouses and appears to have lapsed. The site is also in a peripheral location and its inclusion would not provide a more logical limit for the Designation. We consider that the Plan should not be changed as a result of this part of objection 3719.

**Recommendation**

We recommend that objection sites 64 and 348 be included within the designated District Centre in the Plan.

**MNY 27/02 – Northcott District Centre**
*(Objection 1018)*

This comment that the Map No. 2a does not show the new link road from the Antrim Road to the Ballyclare Road has been classified as an objection to the centre by the Department. We do not consider that it is an objection and remit the comment to the Department for their consideration in the preparation of the adopted plan.
The objections related to comparison and convenience retailing in District Centres were addressed in the strategic retail chapter of our report. We consider that there is nothing exceptional about this centre to justify a different approach here.

LOCAL CENTRE

Designation MNY 28 – Glengormley
(Objections 2760/49 and 3558/13)

Objection 2760 proposes that the defined centre should be expanded considerably to include the following principal areas: the Tesco store, shops, library and health centre on Carnmoney Road, the cinema, Sportsbowl, shops and McDonalds and the former Lidl store on the other side of the main road. This is to include all the existing retail uses and allow for expansion of the centre. We agree with the Department that regional policy allows for new retail development that meets a local need in locations adjacent to local centres. This would address any perceived shortfall in terms of expansion of the centre should that be necessary. We shall now consider the main areas proposed for inclusion in turn.

The Tesco store and community facilities on Carnmoney Road are separated from the Local Centre by residential properties and a large park. We consider that the arbitrary inclusion of this obviously separate area by means of a thin connecting strip would be completely illogical and unacceptable. This degree of separation distinguishes the Tesco store from the Asda store in Dundonald, which has been included in the Local Centre. That Asda store is contiguous with the defined centre and so was included in the designation. The Lidl store in Glengormley has closed and this area is again separated from the rest of the centre on that side of the road by large buildings and their curtilages including a school, church and hall. We see no basis for its inclusion in the Local Centre.

The Department has conceded that the Spar/petrol filling station and 3 new units at 290 Antrim Road (objection 3558) should be included within the centre because they lie immediately adjacent to it and perform local functions. We agree with this conclusion. We consider that the adjoining cinema, bowling alley, shops and restaurant should not be included. Whilst they perform a service role for the area and relate well to the defined centre, the uses do not fall within the definition of a Local Centre in PPS5. We cannot disaggregate this part of a single objection site for separate consideration. We note the point that Dundonald has a much larger defined Local Centre, but even if it is correct, it is not a relevant factor for the designation of other centres.

We conclude that objection site 2760/49 is unacceptable for inclusion because of its excessive size and for the reasons given above. We agree that objection site 3558/13 only should be included within the Local Centre.

Recommendation

We recommend objection site 3558/13 is included within Designation MNY 28 – Glengormley Local Centre.
URBAN ENVIRONMENT

Objection to MNY 29 – in respect of Merville Garden Village Conservation Area
(Objection 969/3)

The Merville Residents Association sought that the Additional Design Criteria for the Conservation Area should address the issues of: resurfacing of roads and footpaths, and replacement of street lighting/furniture. It also sought an expansion of the Conservation Area boundary.

As we have already stated elsewhere, a development plan cannot address changes to Conservation Area boundaries. We have recommended in Part 1 of our report that policy UE2 of the Plan, relating to Additional Design criteria, is deleted. We recommend no change to the Plan as a result of this objection.

OBJECTIONS TO AREAS OF TOWNSCAPE CHARACTER

Objection to all ATC designations in Newtownabbey MNY30 to MNY38
(Objection 3795)

This objection argued that the designations were not justified in whole or in part and sought deletion of some or all of the ATCs, or modifications of their individual boundaries. However, no specific arguments were presented that would enable our further consideration of this objection. We recommend no change to the Plan as a result.

MNY 30 - Abbeyville Park

Objection 3825/30

The Housing Executive submitted that the designation will have implications for future improvement works to the prefabricated dwellings within the ATC which are public sector housing. It raised concerns that such improvement works may be expensive due to ongoing problems with corrosion on the dwellings. However, this is not a reason to delete the ATC as the designation would not impose a ban on improvements. No persuasive evidence was provided to demonstrate that the ATC designation is not justified. We recommend no change to the Plan.

Objection 2953/3

This objection sought the inclusion of the dwellings in Abbeyville Gardens within the boundary of the designation. The dwellings in Abbeyville Gardens are not of an aluminium prefabricated construction and therefore, they do not exhibit the features, which form the basis for the designation. The inclusion of Abbeyville Gardens within the designation would not be appropriate. We recommend no change to the Plan.
**MNY 32 - Hazelbank / Abbeylands**

See also objection 1746 - Coast

Objections 695 and 703

These objections claimed that the name of this ATC was misleading and should not refer to Hazelbank. It was suggested that the name be changed to Abbeydene/Abbeylands so that the ATC and LLPA MNY 46 would not be confused.

We note that the ATC lies immediately adjacent to Hazelbank Park and the Department’s reference to Hazelbank in the title for the designation is thus understandable and reasonable. We see little benefit in, or need for, an amendment to the title; however, we remit the matter to the Department for its consideration.

With regard to the suggestion that Abbeydene/Abbeylands should be designated a Conservation Area, we reiterate that this is not a matter that an area plan can address.

**Objection 3484**

This was a general objection to the designation. However, no specific arguments were presented that would enable our further consideration of this objection. We recommend no change to the Plan.

**MNY 33 - Lenamore**

(Objection 2953/4)

Newtownabbey Borough Council sought that the ATC should be extended to include the bungalow developments in Lenamore Crescent, Lenamore Gardens and the southern end of Lenamore Park. However, it submitted no evidence to support its objection. These developments do not exhibit the key features of the designation and do not reflect the generously landscaped layout in other parts of the ATC. Therefore their inclusion in the ATC would not be appropriate. We recommend no change to the Plan.

**MNY 34 - Old Manse Road**

Objection 866

This objection challenged the inclusion of five modern bungalows on Old Manse Road within the ATC. However, while the inclusion of these properties is inconsistent with the character of the other buildings which form the basis for the designation, their inclusion is logical as they provide a link between two critical parts of the ATC - the Arts and Crafts dwelling at Carragh Lodge on the Glen Road and the listed building at No. 57 Old Manse Road.

This objection also sought an extension to the ATC by the inclusion of the dwelling at No 42 Circular Road within its boundary. However, as the property on the plot has been
demolished, consideration of this objection is now unnecessary and we recommend no change to the Plan.

**Objection 2953/5**

This objection sought the extension of the ATC to include all the properties SE of the designation between the Circular Road and Old Manse Road and extending down to the Shore Road. These properties are characterised predominantly by inter-war and post-war housing developments with a regimented grain. This is at odds with the more disparate, spacious setting and character of the late Victorian and Edwardian dwellings which form the basis for the designation. Therefore their inclusion would not be appropriate. We recommend no change to the Plan.

**MNY 35 - Rush Park**

**Objections 151 and 2953/6**

These objections sought the inclusion of Woodland Crescent and Nos. 1 -11 Doagh Road within the ATC designation. Woodland Crescent is a housing development comprising single-storey semi-detached dwellings and two storey terraces.

The ATC designation relates to the Rushpark estate, built by the NI Housing Trust in the 1950’s. The estate is designated as an entity because it is a good example of a post-war housing scheme. The suggested additional areas are not part of the estate and should not therefore be included within the ATC. We recommend no change to the Plan.

**Objection 3825/2**

The Housing Executive challenged that the two high-rise blocks are not worthy of an ATC designation. However, these blocks are sited adjacent to the central landscaped public open space within the ATC. They form an integral part of the layout of the original Rush Park development. Their exclusion would not be appropriate.

The Housing Executive considered that the designation of the ATC may give rise to prohibitive costs in respect of major improvement works that it has proposed. However, this is not a reason to delete the ATC as the designation would not impose an embargo on improvements and no evidence was presented that such works would incur greater costs. We recommend no change to the Plan.

**MNY 36 - Whiteabbey**

**Objection 866**

This objection challenged that the area does not have sufficient character to warrant classification as an ATC and its inclusion would devalue the concept. Having considered the information provided by the Department, and the consultant’s report, we
conclude that there is merit in designation of the ATC, but only in part. It is noted that the emphasis in the Departmental evidence is that there is merit in respect of many of the buildings which lie to the south of the Shore Road and the buildings located between Methodist Church and the listed Presbyterian Church to the north of the road. No. 1 Circular Road, the adjacent extensive mature trees and vegetation, and the open space opposite are notable as providing a soft green edge to the ATC. Though planning permission has been granted for 7 houses on part of the land adjacent to No. 1 Circular Road, many of the trees on the site are covered by a Tree Preservation Order (TPO). This site continues to contribute to the character and amenity of the area. We consider that these aforementioned parts of the area exhibit sufficient distinct character and intrinsic qualities based on the historic built form to warrant designation as an ATC.

The only other buildings on the north side of the Shore Road referred as being of particular merit were Nos. 620-630. However, these have been demolished and recently replaced with three-storey street frontage buildings with retail units on the ground floor, which do not contribute to the ATC. The other buildings on the north side of the Shore Road from Nos. 604, 612-614 and Nos. 1-9 Old Manse Court are of more modern construction and do not warrant inclusion in this ATC. The car park does not contribute to the ATC. We consider that the inclusion of these properties and the car park would devalue the concept of the designation and should be excluded.

Objection 3606

This objection related to the key features of the designation and questioned the validity of listing “No. 1 Circular Road, set within generous grounds” as a feature of the ATC, given the planning permission granted under appeal for 7 houses on the adjacent land. We note from the appeal decision that the approved development was confined to the eastern part of the land, away from the protected wooded area framing the western part of the site along Circular Road. While the planning permission has not been implemented, we consider that even if the housing development was built, No. 1 Circular Road would still retain generous grounds. The location of the approved dwellings would not conceal the impact that the property has on the landscape as the protected trees would continue to contribute to the character and amenity of the area.

This objection requested that specific reference should be made to the TPO attached to the wooded area adjacent to No 1 Circular Road and the surrounding stone wall. As the trees and wall contribute to the character and amenity of the area, these features are worthy of being specifically noted.

Objection 2953/7

This objection sought the extension of the ATC along the Shore Road to include the properties at Chestnut Hill and a number of detached properties at Nos. 642-660. No evidence was submitted to support this objection. Chestnut Hill, a modern development which extends back from the Shore Road, has little architectural merit and the development does not contribute any special interest to the area. The detached dwellings at Nos. 642-660 are an eclectic mix of architectural styles and do not reflect the age and character of the other buildings in the ATC which form the basis for the
designation. The inclusion of any of these properties would introduce a discordant element. We therefore recommend no change to the Plan as a result of this objection.

**Recommendation**

We recommend that:-

- The boundary of the ATC is amended to exclude all the lands north of Shore Road, between Old Manse Road and Circular Road.

- The wall and the protected trees adjacent to No. 1 Circular Road are recognised as key features within MNY 36.

**MNY 37 - Whiteabbey Mill**

(Objection 2953/8)

Newtownabbey Borough Council sought extension of the boundary of the designation along Dillon’s Avenue to include the properties between Nos. 15-21 and Nos. 22-48. We note that many of these properties replicate the character, style and large plots of the other dwellings on Dillon’s Avenue that lie within the ATC. It seems illogical to have the boundary defined by the western hedgerows at No. 13 on the north side of the street and No. 20 on the south side.

**Recommendation**

We recommend that the ATC is extended along Dillon’s Avenue to include Nos. 15-21 and Nos. 22-48.

**OBJECTIONS SEEKING THE DESIGNATION OF ADDITIONAL ATCS**

**Land at Whitehouse Park**

(Objections 695/1 and 2953/11)

The Ratepayers Association and Newtownabbey Borough Council identified Whitehouse Park as being suitable for an ATC designation. Whitehouse Park, located between the railway track and the M5 motorway, is a crescent of detached and semi-detached houses with large rear gardens, particularly at those properties to the east of the road. With the exception of the more recent development of Whitehouse Gardens at the southern end of Whitehouse Park (which Newtownabbey Council excluded from its identified boundary), the dwellings appear to date from the pre and interwar periods. Single-storey brick dwellings with hipped roofs predominate, with two-storey dwellings of varying designs more prevalent towards the southern end. The quality of design of the different dwelling types does not exhibit any particular architectural merit and many of the original buildings have had significant alterations with the addition of dormers and extensions.
The area identified by the Ratepayers Association includes Whitehouse Bawn which, it argued, should be designated and protected, as it is one of the oldest buildings in the Metropolitan area and gave the local area its name. The objection challenged that the area had more character than some of the new ATCs identified in Newtownabbey. Whilst the bawn is a notable building, it of itself would not justify the area being designated as an ATC. Taking account of the information provided by the Department, the consultant's report, and our own observations, we consider that this area does not exhibit sufficient distinct character and intrinsic qualities, based on historic built form and layout, to warrant designation as an ATC. We recommend no change to the Plan.

**Land at Abbots Cross and Cambrai Park/Drive**

(Objection 2953/9-10)

Newtownabbey Borough Council suggested two other additional ATCs as follows:

Abbot's Cross – The Council provided no evidence to support its objection and has not identified the features, which it considers worthy of designation as an ATC, for our consideration. This is a distinctive area with a general uniformity of style, characterised by flat roofs. However, it does not display the same quality of environment, layout and design as the other designated areas. Taking account of the information provided by the Department, the consultant's report, and our own observations, we consider that this area does not exhibit sufficient distinctive character and intrinsic quality, based on historic built form and layout, to warrant designation as an ATC. We recommend no change to the Plan.

Cambrai Park and Drive – The Council provided no evidence to support its objection and has not identified the features which it considers worthy of designation as an ATC. The two streets consist of predominantly semi-detached dwellings with varied types and finishes. There is little continuity of style and a considerable number of alterations to the front facades and extensions. Millburn House, accessed via Cambrai Drive, is a modern development of flat-roofed sheltered housing between the two streets. Considering the information provided by the Department, the consultant’s report, and our own observations, we are not convinced that this area exhibits sufficient distinctive character and intrinsic quality, based on historic built form and layout, to warrant designation as an ATC. We recommend no change to the Plan.
NATURAL ENVIRONMENT

OBJECTIONS TO SITES OF LOCAL NATURE CONSERVATION IMPORTANCE

MNY39/08 - Three Mile Water
(Objection 2145/19)

The objection stated that the map showing SLNCI MNY 39/08 should include the existing woodland, river and both river banks in this area. No map was provided to detail the specific areas the objector referred to.

MNY 39/08 comprises a long stretch of land that runs across and through Metropolitan Newtownabbey, broadly following the line of the Three Mile Water River. The SLNCI designation includes areas of woodland, open space, both formal and informal, and other lands. Whilst the map showing the extent of the designation is at a large scale, it does include riverbanks and existing areas of woodland. Without further details of the areas referred to by the objectors we can make no further comment. We recommend no change to the Plan.

MNY 39/09 - Willowbrook

See also objection 1746 - Coast

Objection 695/9

The Ratepayers Association pointed out that tidal ponds and a cycle/pedestrian path had been omitted from Map 2t. Given that the plan submitted with the objection was a copy of Map 2t and was annotated to show the ponds and path within the designated area, we take the objection to be to the accuracy of the original map itself. We see no need for every feature on the ground to be included on the Plan’s maps. The features are clearly within the SLNCI and fall within the ambit of its policy. Notwithstanding this, should a more up-to-date plan exist, we would encourage its use by the Department.

The objection also referred to the grounds of No. 405 Shore Road which “dips into the designation”. An extension of the SLNCI was sought to address this. No plan was submitted to identify the suggested extension; however, we observed that the wooded escarpment within the designation runs from north to south, through the curtilage of No. 405. We see no physical reason why the escarpment within the grounds of No. 405 should be excluded from the designation when it is included to both the northern and southern sides and consider that the boundary of the SLNCI should be amended to address the matter.

Recommendation

We recommend that the boundary of the MNY 39/09 is extended to include the wooded escarpment within the curtilage of No. 405 Shore Road.
OBJECTIONS TO LOCAL LANDSCAPE POLICY AREAS

MNY 40 - Abbey
(Objection 833/4)

The United Hospitals Trust objected to the Abbey Local Landscape Policy Area (LLPA) MNY40. The objection stated that the extent of the LLPA to the north places undue constraint on the development of the Whiteabbey Hospital site. The site comprises a large, overgrown field. The northern, eastern and southern boundaries are defined by mature trees and hedges. The western boundary, which adjoins the rear of a housing development, the old Hill Croft School and a Health Trust building, is defined by a post and wire fence. Whiteabbey Hospital adjoins the site to the north. The site slopes downwards to the east, but at a steeper gradient in the northern section. The Plan identifies a scheduled monument located in the southern part of the site.

No information was put forward in respect of firm development proposals in respect of the Hospital. The LLPA designation would not necessarily prohibit development within the site provided it was not likely to have a significant adverse effect upon the features of the LLPA, namely the archaeological monuments and the open space amenity that the site provides. It is conceivable that these features could be protected whilst allowing for careful expansion of the Hospital. We consider that the LLPA designation should stand and there should be no change to the Plan.

MNY 43 – Campbell Road/Manse Road

Objection 3825/34 (also seeking zoning for housing)

The NIHE objected to the Campbell Road / Manse Road Local Landscape Policy Area MNY 43 (LLPA), questioning its rationale and stating that the land would be more suitable for housing development.

The site comprises a large strip of land that runs along the northern side of Manse Road and adjoins the existing Manse Way housing development and Hill Croft School. It also includes a strip of land running along the northern edge of Carn Drive, another housing development north of the school. The Mossley Recreation Grounds, including playing fields, bowling green, tennis courts and a club house also lie within the site. Much of the site along Manse Way is overgrown with scrub and mature vegetation, whilst the areas in proximity to the housing developments are associated maintained grass areas. There is an unscheduled and excavated rath on land at Ballyhenry at the north-western edge of the designation.

Although the designation is comprised of a mix of types of land and land use, it provides open space and visual amenity functions, as well as accommodating an unscheduled archaeological monument. We find the rationale behind designation MNY 43 well founded. The LLPA designation would not necessarily prohibit development within it provided it was not likely to have a significant adverse effect upon the features of the LLPA. We consider that the LLPA designation should stand and that there should be no change to the Plan.
Objection 3824/21

See objections to zoning MNY 07

MNY 44 – Carnmoney Hill  
(Objection 2009)

This objection was to the inclusion of a strip of land between Sharonmore Green and Forthill gardens within the LLPA. The site comprises an access roadway, which abuts an area of grassed open space.

We were not presented with any explanation for the objection. Notwithstanding this, it is obvious that the designation was intended to apply to the open space and not the objection site. There is no reason why the subject roadway should be included at the edge of this LLPA designation and we recommend its removal.

Recommendation

We recommend that the objection site is removed from the MNY 44 LLPA.

MNY 46 - Hazelbank  
(Objections 695 and 703)

The objection sought identification of Hazelbank Park as a SLNCI, AOCMD and AOHSV. No map was supplied with the objection to indicate the extent of the proposed new designations. It was submitted that the views from the park should be referred to in the Plan as a feature of the LLPA and that the Plan map should be updated to show the existing layout of paths.

Our recommendations on the identification of AOCMDs are set out in Part 1 of our report and we do not consider this element of the objection further. The Department considered that designation of the park, “including Gideon’s Green”, as a SLNCI would be justified. A map was supplied showing the extent of the proposed new SLNCI.

We have no reason to disagree with the Department’s analysis. However, we note that areas outside the MNY 46 LLPA designation have been included in the proposed SLNCI, to the east of Lismara Court and at Abbeydale Close. These appear to be outside Hazelbank Park and, if so, we do not consider that they would fall within the ambit of the original objection. We are also unclear as to whether or not Gideon’s Green is actually part of the Park. We remit this matter to the Department for its consideration.

We see little benefit in designating the Park as an AOHSV, given the protection afforded it by regional policy in PPS8, the LLPA/SLNCI designations and its location within the BMA Coastal Area.

We concur with the objection that the Plan maps should be updated as far as possible prior to adoption. We have no reason to disagree with the Department’s view that it
would be appropriate to refer to the views from the LLPA as one of the key features thereof. The proposal to designate a SLNCI obviously recognises the nature conservation importance of the park.

**Recommendation**

We recommend that:

- Hazelbank Park is designated as a SLNCI.
- Views from the Park are referred to in the Plan as one of the important features of the LLPA.
- Plan maps should be updated, where possible, to show the up-to-date layout of the Park.

**MNY 48 - M5 Lagoon**  
*(Objection 695/10)*

This objection challenged the listing of an unnamed mound and a 17th century bawn as features of the LLPA as neither of these fall within its boundary. Given their location outwith the LLPA, we consider it inappropriate that they are listed as features.

The objection argued against the inclusion of important views of Belfast Lough from within the LLPA as one of its features. In our opinion, as views of Belfast Lough from both Gideons Green and Whitehouse Lagoon are impeded by the M5, it is not appropriate that such views are listed.

The objectors also challenged the description of the trees on the boundary of the designation as ‘mature’ when compared to the trees in Hazelbank Park. While the trees on the boundaries of the LLPA are not as impressive as those in Hazelbank Park, they nonetheless are of sufficient age to be considered mature and therefore it is appropriate that they are described as being so.

**Recommendation**

We recommend that reference to the unnamed mound, 17th century bawn, and views of Belfast Lough are removed from the list of features of the LLPA.

**MNY 49 – Mossley Mill**  
*(Objection 2953/13)*

This objection was identified in the Department’s spreadsheet. However, we cannot discern any objection to the MNY 49 LLPA in the original submission from Newtownabbey Borough Council, which refers to an area of land, identified as open space, and lying between the railway line and the Three Mile Water River. This patently cannot be MNY 49 and we need not consider the matter further.
**MNY 50 - Rathcoole**  
*(Objection 3825/36)*

NIHE objected to the exclusion of a portion of land from the LLPA. The subject area contains the Rathcoole Youth and Community Centre and accompanying Diamond Play Area. The building is a large two-storey structure of modern design, whilst the Play Area comprises a fenced plot with various play equipment and a safety surface. The objection stated that they should be included within the designation given that the Plan text for MNY 50 directly refers to the Youth and Community Centre as part of the features that contribute to the LLPA. We note that the layout of the area appears to have changed since the Plan maps were prepared.

The Department stated that the rationale for the exclusion of the building was that it is not of particular landscape and visual merit. However, we note that the description of MNY 50 in the Plan refers to the building in question and lists the feature as an area of local amenity importance. The Plan does not restrict the features of MNY 50 to those solely relating to visual amenity. We note that part of a new housing development now falls within the LLPA designation. There would appear to be a need for the Department to review the LLPA boundary to the south of Rathcoole Drive, given the changes to the area. In our view, given the key features in the Plan, to which there were no objections, the community buildings and play ground must be included. We also recommend that the housing is excluded.

**Recommendation**

We recommend that the boundary of MNY 50 is amended to include the community buildings and play ground, and exclude the area of housing, south of Rathcoole Drive.

**MNY 52 - Sandyknowes**  
*(Objection 1330/1)*

The objection by Translink sought the removal of the LLP A designation. Although no map was submitted with the objection, it was stated that there was an extant planning approval for a Park & Ride facility on the Ballyhenry Road. This may be the informal park and ride site referred to in paragraph 5.87 of the BMTP.

The LLPA comprises two distinct pieces of adjoining land situated to the east of the Sandyknowes roundabout. Sandyknowes Parkland comprises a grassed area surrounded by a belt of mature trees, with informal sports pitches and an equipped playground. The other portion of land along the Ballyhenry Road is a long, narrow strip of overgrown ground, separated from the adjoining housing development to the east by post and wire fencing. The two parts of the site are separated by the intervening mature treeline that forms the northern boundary of Sandyknowes Parkland.

Whilst we cannot be definitive about the site without a map or detailed planning history, it is likely that the rough grassland area is the location of the approved Park and Ride facility. The LLPA designation would not remove development rights conferred on the land by the planning consent to which the objection referred. There is no reason in

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Newtownabbey
principle why the approval and LLPA could not co-exist. On the basis of the information before us, we consider that there is no substantive case for deletion of the LLPA and we recommend no change to the Plan.

**MNY 54 - University of Ulster**  
(Objection 640/17)

The objection by Carrickfergus Borough Council questioned the logic of including the University of Ulster Jordanstown building and 12 hectares of car parking space within LLPA. There are a number of sports pitches adjacent and north-east and north-west of the site. The buildings within the campus are of mixed design and include the old university building, now listed. There are mature trees within the site and surrounding parts of it.

Whilst the building and car park referred to by the Council are themselves not particularly attractive, they fall within an area that contains a listed building and landscape of visual and amenity importance. It would not be logical to remove the UUJ building and car parks from this, creating a gap within the designation. We consider that the designation should stand and recommend no change to the Plan.

**MNY 55 - Valley / Glas-na-Braden**  
(Objection 969/5)

The objection relates to the Merville Garden Estate and two separate sites in proximity to Merville. The objection seeks the inclusion of Merville and these pieces of land within the Valley / Glas-na-Braden Local Landscape Policy Area (LLPA) MNY 55.

Merville Garden Estate comprises a large area of land with several house types situated within mature landscaped areas. The estate slopes upwards from the Quay Road to the north-west before levelling off towards the top end. The Estate is designated as a Conservation Area.

The first site comprises a long, narrow strip of land that runs along the south-western edge of Merville Garden Estate, separating that development from the Abbey Centre retail park. The strip is covered in mature deciduous trees and bushes and slopes upwards in a north-westerly direction where it widens out into a wedge shaped area that is also heavily vegetated. The second site comprises an area of informal open space comprising a maintained grass area, mature trees and some scrubland. It lies on the south-eastern side of Quay Road opposite Merville Garden Village. Adjacent and south-west lies an area of vacant land, hard-surfaced but largely overgrown in weeds. Beyond that is a series of dwellings fronting the road with larger shed type buildings to the rear, which occupy various retail and employment uses.

The LLPA designation MNY 55 is designated on the basis of several features and we do not consider that the Merville Garden Estate, though attractive and of note itself, comfortably fits within the defining features of the LLPA, given its character is one of built development. Merville already receives protection from its status as a Conservation Area.
Area and we are not persuaded that inclusion within an LLPA is necessary or appropriate.

The two sites are physically separated from MNY 55, and despite their attractive appearance and potential for supporting some wildlife, they do not fall within the list of features for which MNY 55 was designated. We consider that they should remain outwith the LLPA designation and recommend no change to the Plan.
OPEN SPACE, SPORT AND OUTDOOR RECREATION

Land adjacent to the Diamond, Rathcoole - objection to identification of open space and seeking a mixed use zoning
(Objection 3825/109)

NIHE objected to the identification of land as open space. The land is termed the ‘Rosslea site’, adjacent to the Diamond, in the Rathcoole estate. It comprises an area of maintained grass with several semi-mature trees on it. The land is generally flat but slopes steeply up along the western boundary. It lies adjacent to a relatively new building that houses the Citizens Advice Bureau and is advertising available office space for lease. Beyond this building to the south lies a block of shops with flats above them, as well as a car park area.

NIHE stated that it and a number of other agencies had proposals for a multi sports complex, youth centre and housing on the site and that the site should be rezoned for mixed use. NIHE did not clarify if the housing would be social or private sector. It was also stated that there was sufficient open space in the area given the adjacent open space area which included playing fields. NIHE stated that the mixed use zoning would bring about substantial benefits for the local community.

In Part 1 of the Report we concluded that there was a shortfall of social housing in the Plan area. The ‘Rosslea site’ lies adjacent to a large area of existing, well maintained open space which provides adequate space for recreation and visual amenity functions. The re-zoning of this site for mixed use entailing community facilities and housing would represent a community benefit and outweigh the loss of an area of open space that only serves a visual amenity function. The site is in a sustainable location for such new development. We note that the Department agreed that mixed use sites could include housing. Given the shortfall in social housing, an element of this on the site would contribute to a reduction in the identified shortfall. We recommend accordingly.

Recommendation

We recommend that the site be zoned for mixed use with a key site requirement that it is developed for community facilities and social housing.

OBJECTIONS TO COMMUNITY GREENWAYS

MNY 56/02 - Objection seeking the extension of the Monkstown to Belfast Community Greenway
(Objection 702/8)

Sustrans sought the extension of the Monkstown to Belfast Community Greenway (MNY 56/02), stating that it should be extended northwest to Loughshore Park. The proposed Community Greenway (CG) runs from Monkstown to Belfast through Hazelbank Park, situated on the eastern side of the M5. Loughshore Park lies...
approximately 0.5 km to the north-east of Hazelbank Park and comprises an area of
maintained open space consisting of grassed areas with walkways, public seating and
art, along with a car park and coffee shop. There is a footpath that runs along the Shore
Road from the Loughshore Park back towards Hazelbank Park.

The Plan states that CGs are green space networks which enhance existing open
space provision by linking areas together. Whilst the link between the proposed CG
MNY 56/02 and Loughshore Park would be a footpath along the coast side of the Shore
Road, we consider that this would be a logical linkage to include within the designation,
notwithstanding the change in direction the CG would take.

**Recommendation**

We recommend that MNY 56/02 should be extended to include Loughshore Park and
that the descriptive text and relevant map in the Plan are amended accordingly.

**Objection to Designation MNY 56**

(Objection 2145/15)

The objection stated that greater recognition should be given to the importance of
continuous green corridors linking the countryside with built up areas. It went on to state
that minimum criteria should be included for the creation of Greenways, citing example
criteria, including that they be tree lined routes, have wide footpaths, cycle routes and
traffic calming. It was also suggested that such routes with little traffic be classified as
play streets and include a continuous strip of grass / shrub planting.

The Plan states that Community Greenways are green space networks which enhance
existing open space provision by linking areas together. Greenways have recreational,
ecological and aesthetic roles. The Plan does not contain strict criteria relating to the
designation of CGs and we are not persuaded that this is necessary given their function,
as referred to in the Regional Development Strategy, is essentially to create a network
of urban open spaces. This broad definition allows for inclusion of land that might not in
itself possess great merit, but would provide a functional linkage between other green
urban areas. To impose a strict series of criteria for definition of CGs could prove
counterproductive in achieving the goal of a network of urban open spaces.

We do not consider the Plan to be an appropriate vehicle for definition of lightly
trafficked routes as play streets. It is not a function of the Plan to provide new
landscaping within Greenways. We recommend no change to the Plan.
OTHER MATTERS

**Objection to the lack of protection for existing housing along part of Shore Road, Newtownabbey**
(Objection 969/1)

The objection relates to a number of dwellings situated along Shore Road between the Longwood Road junction and Mill Road junction. It was stated that the housing in this area has a strong community basis and should be afforded due protection from further unwarranted incursions. The housing comprises a mix of single and two storey dwellings of varying age and design. They are generally well maintained and have reasonable areas of garden space. Whilst one dwelling has been converted to a business use, the overall character of the area is residential. The objection area is unzoned in the Plan.

Policy HOU5 of the Plan only provides for the protection of existing housing areas in city and town centres. In Part 1 of our report we endorsed the Plan’s approach in this respect. As the objection relates to housing outside such an area, we cannot support the designation sought.

**CONCLUSIONS IN RESPECT OF THE HOUSING ALLOCATION TO METROPOLITAN NEWTOWNABBHEY**

We have found a number of sites to be suitable for inclusion within the settlement limit as housing zonings. We have also recommended housing zonings on various sites within the draft Plan SDL. The additional housing lands should be sufficient to meet the uplifted HGI figure for Metropolitan Newtownabbey. Our conclusions on provision of a STLR are set out in Part 1 of our report. We have identified only 1 objection site in Newtownabbey as suitable for inclusion within this; namely 2529/4. We acknowledge that this leaves a potential shortfall of around 700 units, if the STLR release becomes necessary. In our opinion, the additional allocation could be addressed through the release of parts of sites 1720 and 3695, which we found to be unacceptable as submitted. We remit this issue to the Department for its consideration.
BALLYCLARE

OBJECTIONS TO THE SETTLEMENT LIMIT (INCLUDING BALLYCLARE RELIEF ROAD PROPOSAL BE 14)

Housing land allocation in Ballyclare

Ballyclare is identified in the RDS as a town where significant planned expansion will take place in order to accommodate growth related to the BMA. Our conclusions on the quantum of housing to be allocated to Ballyclare are set out in Part 1 of our report in paragraphs 3.2.72 and 3.2.73. We have stated that an additional allocation to Ballyclare of around 800 dwellings is appropriate. Notwithstanding the physical suitability of various objection sites for housing development, we cannot recommend the inclusion of all such lands within the settlement limit given that the resultant quantum of new housing would greatly exceed that which we have recommended.

There is significant traffic congestion in Ballyclare town centre, primarily resulting from traffic from the northern, eastern and western portions of the town accessing the A57, which is a main commuter route. We consider the provision of the Ballyclare Relief Road (BRR) to be critical both to the growth of the town, and its proper planning. Deliverability of the road has therefore been given significant weight in our consideration of objections seeking additional housing land. In order to secure early provision of the BRR we have not recommended adoption of a STLR in Ballyclare.

General objection to the SDL
(Objection 1782)

This objection submitted that there was insufficient land zoned for housing within the settlement development limit of Ballyclare. It was posited that the SDL in the Plan would diminish the natural growth of the town and result in out-migration of population. No further arguments were advanced and no specific sites were identified. We have considered the growth of Ballyclare in Part 1 of our report. In the absence of any site specific arguments, we cannot consider this objection any further. We recommend no change to the Plan.

Objection to further development in the absence of adequate infrastructure
(Objection 2164/4)

The Ballyrobert Community Association argued that all development proposals in Ballyclare should be abandoned and transport infrastructure established before consideration of new development. It was also argued that sewage infrastructure in the area is very poor and on that basis there should be no more development in the Ballyclare and Doagh areas.

The objection did not explain how the roads infrastructure is inadequate in Ballyclare. The Plan recognises the need to provide the Ballyclare Relief Road and it may well be this to which the objector was referring. We acknowledge that delivery of this road is
critical to the town’s growth and address the mechanism for its delivery below. Its provision cannot be secured in the absence of development. We have no indication from the Department that there are insurmountable difficulties with other infrastructure that would preclude new development. Such matters would be prime considerations at the development management stage and there is provision in policy for developers to contribute to provision of necessary infrastructure. We recommend no change to the Plan based on this objection.

Land to the East of Rashee Road  
(Objections 246 and 3441)

Site 3441 comprises a number of fields to the north of housing zoning BE 02/06. The site is remote from a public road but access has been provided for in the aforementioned zoning, which is largely developed. Site 246 comprises a number of fields between site 3441 and Rashee Road. Housing zoning BE 02/06 and a small estate known as The Priory abut the site, to the south. The Department considered both sites suitable for development, scoring site 246 as ‘A1’ and site 3441 as ‘C2’ in its matrices.

Site 246 contains relatively level land, and development thereon would not be prominent or detrimental to the setting of the town. We accept that its inclusion within the settlement would result in growth of the town in a logical direction. We are not persuaded that there is any impediment to its development in terms of infrastructure, other than the general need for the provision of the BRR. There is no strong definition to the current SDL in this location and the development of the site would facilitate buffer planting that could address the issue.

Site 3441 also contains relatively flat land, some of which has limited agricultural value. The presence of a pylon and a watercourse within this site are not insurmountable obstacles to its development and we draw the same conclusions in respect of infrastructure and the definition of the SDL as for site 246. Notwithstanding this, the site as submitted extends considerably further northwards than site 246 and would result in excessive growth of the settlement in that direction. We therefore disagree with the Department’s conclusion that the site would be suitable for inclusion within the settlement.

Whilst a contribution towards the BRR proposal could be required in connection with development of site 246, it does not contain any of the land required for its construction. Its contribution to the road’s provision cannot therefore be afforded determining weight, as is the case with other lands to the west of Rashee Road. The subject site is not required to address our recommended housing allocation for Ballyclare and we do not recommend its inclusion within the SDL for development. We accept the objector’s arguments that housing on both of these sites would be ‘deliverable’ in the short term; however, the same could be said of other lands in the area and this factor in itself does not outweigh our conclusions. We recommend no change to the Plan as a result of the objections.
Land at Ballycorr Road  
(Objection 2733)

The objection sought inclusion of the site within the SDL for housing and its exclusion from the proposed BE 18 LLPA. This site comprises of a number of fields to the east of the Riverdale development on the Ballycorr Road. The land rises away from the latter road, before falling steeply towards the flood plain of the Six Mile Water. Field boundaries are defined by a mix of hedges and trees. The Department considered that 3.75 ha of the site would be suitable for inclusion within the settlement.

For obvious reasons, the portion of the site within the flood plain would be unsuitable for development. The BE 04/03 housing zoning stretches along the northern side of the Ballycorr Road and sits at a markedly higher level than the objection site. On the southern side of the Six Mile Water, the BE 02/07 zoning, which has been built-out, also extends considerably further eastwards than does the existing SDL at Riverdale Park. The inclusion of the objection site within the settlement would result in a compact urban form and would represent a logical extension to the town. New development thereon would be less prominent than that on the adjacent BE 04/03 zoning when seen from the Ballycorr Road and from viewpoints across the river to the south. The new urban edge could be defined by buffer planting, which would represent a stronger limit than the existing rear boundary treatments at Riverdale Park. We concur with the objector’s analysis that the three fields abutting Ballycorr Road would, in visual terms, be suitable for development. Notwithstanding this, the yield from the site is not required to meet our recommended level of growth for Ballyclare. We do not consider that development of the site would realistically facilitate provision of the BRR. In these circumstances we do not consider that the site should be zoned for housing.

The site is located on the valley slopes of the Six Mile Water and it is readily visible from various public vantage points. It contributes to the visual amenity of the Six Mile Water valley and we disagree with the objector’s analysis in this respect. We consider that the parts of the site within the proposed LLPA designation should remain so. We recommend no change to the Plan as a result of the objection.

Land at Templepatrick Road  
(Objection 3494)

This site comprises of two fields to the northeast of housing zoning BE 02/07 and an area of floodplain between the latter zoning and the Six Mile Water. The objection sought inclusion of the site within the SDL for housing, and its exclusion from the proposed BE 18 LLPA.

Development on the floodplain would clearly be unacceptable and for this reason alone, we reject that portion of the site. The objection provided no reasoning as to why the site should be excluded from the BE 18 LLPA. We note that this is proposed to be designated because of features which include, inter alia, an area of local amenity importance, the Six Mile Water river corridor, and an area of local nature conservation interest, including low lying wet land and valley slopes. We consider the site to be an integral part of these areas and do not accept that it should be excluded from the designation.
The fields to the northeast of BE 02/07 would appear to be accessible from the A57. They fall away from the road, towards the river. Development thereon would extend the settlement excessively in a north-easterly direction and would not result in compact urban form. The northern boundary of the objection site is defined only by a low hedge, which would represent a less definitive urban edge than the existing mature trees along the boundary of zoning BE 02/07. The site would not contribute towards provision of the BRR and is not needed to provide for an appropriate level of additional growth in the town. We consider the site to be unacceptable and recommend no change to the Plan as a result of the objection.

**Land at Green Road**  
(Objections 59, 169, 1974, 3518)

Site 1974 comprises of a portion of agricultural land on the southern side of Green Road, opposite the mill complex. It is bounded by the A57 to the northwest, the BE 07 zoning to the west and by a dwelling to the southeast. The land rises away from Green Road; the field boundaries are defined by tall mature trees and hedges. The objection sought inclusion of the site within the SDL for housing or other suitable development; there was also an objection to the LLPA designation BE 17. Only housing was referred to in the subsequent submission.

Site 3518 contains a large disused mill complex on the northern side of Green Road. The complex contains a number of old red brick buildings of considerable character, another red brick building of more recent construction, a number of very large corrugated metal buildings, two of which appear to be in current recreational use, and various other derelict buildings including at least 2 dwellings. At the eastern side of the site are two ponds in use as a fishing facility. The northern part of the site also contains land in agricultural use, which has views down over the A57 to the north. There are significant stands of trees within the site and along various boundaries. The objection sought inclusion of the site within the SDL for housing; there was also an objection to the LLPA designation BE 17.

Site 59 comprises a number of buildings, the access to the disused Coulter’s Hill landfill site and an area of rough, overgrown land abutting the western side of Greenwood Avenue, all of which lie on the southern side of Green Road. A large red brick mill building lies opposite the site on Green Road. Some of the buildings within the site are currently in commercial use.

Site 169 encompasses sites 59, 1974, the non-agricultural parts of 3518, and additional land to the south, east and west of site 59. The objection sought inclusion of the site within the SDL for housing; there was also an objection to the extent of the proposed LLPA BE 17.

Our consideration of these sites is not dictated by the information provided by the Department in its various submissions. We attach no significant weight to past opinions expressed by individual Commissioners, which were formed in a very different regional policy context. Previous PAC comments on the NAP do not fetter our consideration of BMAP objection sites. We recognise that the landfill site at Coulter’s Hill is no longer in
use. We accept that all of the sites are reasonably accessible on foot to Ballyclare Town Centre, via Green Road. There is no evidence from the Department that insurmountable infrastructural impediments to development exist. There was no objection from Roads Service, which we find surprising, given the narrow nature of Green Road, which can be difficult for larger vehicles. We acknowledge comments made by objectors that development on the subject lands would not be dependant on provision of the BRR; however, we consider that the redirection of demand away from sites that would contribute to the provision of the BRR would not be in the long term interests of the development of Ballyclare. We do not, therefore, weigh the objectors’ argument in the sites’ favour.

We do not accept that the sites lie within the town limit or the urban area. The absence of agricultural uses, or the existing or previous commercial uses on parts of the lands, do not in themselves justify their inclusion within the SDL. Nor does the existence of services in the area. We accept that much of Ballyclare’s growth has, and will, take place in the northern and western parts of the town; however, this does not dictate that corresponding growth should occur in other compass directions if suitable lands for development do not exist. In any event, we note that significant undeveloped zoned lands exist on the eastern side of the town at Victoria and Ballycorr Roads. We do not accept that 30mph speed limit signs, per se, indicate the ‘start of the urban area’.

We do not consider that development on any of these sites would represent a rounding off of the settlement. Notwithstanding the vertical separation of Green Road and the A57, we consider that the latter represents a strong, perceptible, boundary to the urban area, irrespective of the fact that it was constructed only around 50 years ago. Passing under the A57 flyover, there is a marked change in character, with mature trees and vegetation on the northern side of the road, within site 3518, and the fields comprising site 1974 on the southern side, which exhibit an entirely rural character. Whilst we acknowledge the existence of large scale buildings within the mill complex, these are largely well screened relative to Green Road and do not have a visual impact commensurate with their scale. Seen from the A57, the mill buildings that are visible do not have a strong visual linkage with the housing areas on the northwestern side of that road. We do not accept that the previously developed nature of much of site 3518, or parts of the other sites, in itself dictates that the lands should fall within the settlement. Inclusion of the lands within the SDL would not guarantee the retention or refurbishment of those mill buildings of historic or architectural merit. The buildings on objection site 59 read as sporadic development in an area that has little in the way of urban character. Although the latter buildings are somewhat unattractive, their presence is not such as to render redevelopment of the site an imperative. In any event, they sit on lands separated from the town’s edge by agricultural fields. The cul-de-sac at Greenwood Avenue appears incongruous in its largely rural surroundings and has no discernible visual or physical linkage with the built-up urban area. We do not consider that any of these sites should be included within the settlement limit.

We do not consider that improvement of the area around Greenwood Avenue, to the benefit of its residents, outweighs our conclusions. Nor would the availability of part of the lands for provision of social housing. In our opinion, the future use of the disused landfill site as a public park is not a factor that lends support to the objections. Irrespective of the reasons for their inclusion within the SDL, the BE 06 and BE 07 zonings do not, in our opinion, justify wholesale expansion of Ballyclare on the southern
side of the A57. We note that these zonings are not visible from Green Road. We recommend no change to the SDL as a result of these objections.

We have already stated that designation of land as a LLPA would not automatically preclude its sympathetic development. The BE 17 LLPA is proposed to protect the locally significant Mill buildings and their surroundings, including vegetation, and the planted landfill site at Coulter’s Hill, which is of local nature conservation interest. We were not provided with any persuasive arguments that the LLPA is not justified in respect of the lands surrounding and containing Coulter’s Hill House, which are important in the local landscape and read as part of the surroundings of the mill complex opposite. With regard to the mill site itself, we consider that the areas containing the historic mill buildings, mature vegetation, landscaped areas, mill ponds and river are of significant amenity value and should be retained within the LLPA; whilst the later buildings, including the large corrugated metal structures, contribute nothing positive to the designation, these are so inextricably linked to the adjacent complex that their exclusion would be illogical. We see merit in the inclusion of the disused landfill site in the LLPA, given the planting that has taken place and the future intentions for the land. Objection 169 specifically sought exclusion of a small area of the LLPA to the south of Greenwood Avenue and argued that it had been used as a temporary nursery area for young trees. The Department accepted the suggested change and we have no reason to disagree. We recommend accordingly.

**Recommendation**

We recommend that the area identified in objection 169 is excluded from LLPA designation BE 17.

**Land at Hillhead Road**

(Objection 798)

See objections to Employment zoning BE 06.

**Lands at Doagh Road and Templepatrick Road including the Southern section of the Ballyclare Relief Road**

(Objections 649, 1496, 1886, 3448 and 3508)

Objection 1886 was not accompanied by a map, identifying the lands referred to. However, specific reference was made to the "new road from the Templepatrick Road to the Doagh Road". The concern was that no housing land had been zoned to fund its provision. Objection sites 3448, 3502 and 649 overlap. As reduced, site 3448/3508 comprises several fields to the north of Doagh Road and lands in agricultural use running between the latter and Templepatrick Road. The three roadside fields on the northern side of Doagh Road rise markedly towards a hill crest before falling sharply, rendering the remaining fields hidden from view. On the southern side of Doagh Road, the land slopes markedly downwards towards the southeast and levels out in the Six Mile Water valley, before rising towards the A57. The objections sought inclusion of additional lands within the settlement limit and zoning of these, along with lands within the proposed SDL in the draft Plan, for housing. The objections also referred to the

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alignment of the BRR and the failure of the Plan to allocate sufficient lands to ensure its provision. The inappropriate extent of the proposed LLPA BE 20 was also cited. Objection 649 was to the adverse impact of the proposed BRR on property at 141 Doagh Road. It was argued that additional land should be zoned in order to ensure the new road's provision further to the west of the line indicated in the Plan. The Department considered the lands suitable for development, stating that they are key to the delivery of the BRR. Objection 1496 was, inter alia, to the potential negative impact of development on the Six Mile Water river through pollution. It was argued that a sustainable urban drainage scheme (SUDS) should be adopted for all new development. Septic tanks and culverts should be discouraged and new developments should ensure that access to the river is maintained as a recreational resource.

The Department indicated that a masterplan had been produced for a development stretching from Rashee Road to Templepatrick Road, encompassing lands within objection sites 1978 and 3448. Four planning applications had been submitted for various elements of the scheme. U/2009/0407 is for the Relief Road itself and is undetermined. U/2009/0406 related to the Reader's Park development; this has been approved and development is underway. U/2009/0405, is for residential and ancillary development north of Doagh Road, and U/2006/0377 is for similar development at Doagh Road and land between the latter and the A57. We have no information that the latter two applications or the proposal for the road scheme have been determined.

The Plan, as published, did not zone any lands for housing along the line of the BRR between Doagh and Templepatrick Roads. A yield of 400 dwellings was cited by the objector as necessary to fund the provision of the BRR within the objection lands. We consider this to be a realistic figure for the 17.52 ha site, given the presence of the floodplain. Development of the objection lands would result in the delivery of the BRR and will overcome difficulties in terms of land ownership and assembly of contributions from sites elsewhere in Ballyclare. We consider the site to be vital to the delivery of the BRR between Doagh Road and the A57 and this weighs heavily in favour of the objections. Inclusion of the lands for the use sought addresses the absence of a major housing zoning to fund the BRR between Doagh and Templepatrick Roads. It would result in an acceptable extension of the settlement to the west. The visual impact of development on the lands south of Doagh road would not be significantly greater than that of the existing settlement, which is largely unscreened. The new settlement limit can be defined by buffer planting, which will be beneficial. On the north side of Doagh Road, the site is more prominent and development thereon would have a greater visual impact than that within the existing settlement. However, this would also have been the case given the proposed line of the BRR in Plan Amendment No.1. We consider the additional expansion and impact to be acceptable, given the role of the site in respect of the delivery of the Relief Road. Weighing all of the factors we consider that the proposed additional lands should be brought within the SDL and the objection lands zoned for housing. Our conclusion addresses the specific concerns raised in objection 649; we note, in that respect, that No.141 Doagh Road has been demolished.

It was acknowledged that the Six Mile Water floodplain is a constraint to development in the southern part of the lands. The Department expressed concern in respect of the overlap between the proposed housing zoning and the BE 20 LLPA. We note that the LLPA is proposed in order to protect an area of local nature conservation interest – the Six Mile Water river corridor between Ballyclare and Doagh, providing an important
setting for both settlements. The designation in the draft Plan takes in an extensive area on the valley floor and extends uphill, crossing to the northern side of the Doagh Road. We do not agree with the Department that the LLPA is critical in preventing the coalescence of Ballyclare and Doagh; the two settlements are a considerable distance apart and the loss of the objection lands to development will not result in any perceptible sense of coalescence. Unsurprisingly, we note that there is no RLW proposed between the two. We agree that the lands are an important element in terms of the setting of Ballyclare. However, the current development limit is seen across open countryside, much of it evincing a ‘hard’ edge, and we do not consider that the proposed new limit would be significantly worse; in fact an element of gain would ensue, particularly in respect of the lands between Doagh Road and Templepatrick Road, in that KSRs could require the planting of significant buffer planting to create a new settlement edge. In terms of nature conservation interest, the Department indicated that this was mainly confined to the floodplain of the river, where no built development could take place in any event. With the exception of the floodplain, we consider that the objection lands should be excluded from LLPA BE 20. We note that the exact extent of the floodplain has yet to be identified; the necessary survey will address this matter and should provide a basis for the amended LLPA boundaries.

We recognise that a Masterplan has already been submitted to the Department in respect of the objection lands. This may not, however, be the only proposal relating to the site. We therefore consider it important that a KSR requiring a Concept Masterplan for this extensive site and other zoned housing lands to the south and east, connected by the BRR, should be adopted. We do not see any need for a Masterplan to address the development of zonings BE 04/02 or BE 04/03, as suggested by the Department, as these are physically unrelated to the objection lands. We do not consider that the KSRs suggested by the Department in respect of: density of development, access to the site, cycle and pedestrian links, and an Article 40 agreement are necessary as the matters are addressed by regional policy. The suggested KSR relating to the TA should be retained as it refers to other zonings, the traffic impacts of development on these sites must clearly be factored into the exercise. In light of our conclusions in respect of objection site 1978 b, we have suggested an amended wording for the requirement. Much discussion took place at the Inquiry regarding the form of development that would be appropriate. We consider that the exact line of the BRR through the site, junction layouts, the positioning of housing areas, internal landscaping, treatment of watercourses and landscape corridors, and access to the river are matters for either the Concept Masterplan or the detailed design stage that do not need to be addressed in the Plan or by KSRs. Other suggested KSRs, which read like planning informatives, are also unnecessary. Issues relating to pollution of the river during or after development are within the ambit of environmental legislation and are not matters that the Plan need address. We do not envisage that new residential development on these lands would involve the use of septic tanks.

**Recommendation**

We recommend that:-

- The SDL should be amended to incorporate all of the lands within objection site 3448. The lands should be zoned for housing and KSRs should be attached requiring that:
A Concept Masterplan to facilitate the comprehensive development of the zoning, together with all other zonings through which the Ballyclare Relief Road will run, shall be submitted to, and agreed with, the Department.

A comprehensive TA shall be provided to analyse the overall impact of proposed housing, taking into account proposed housing developments on objection site 1978 b and zonings BE 04/02 and BE 04/03, and to identify any necessary improvements to the road network/public transport/transportation facilities in the area. In addition to the need for a TA, and the requirements identified therein, the entirety of the Ballyclare Relief Road shall be provided in its entirety from the A57 Templepatrick Road to the northern boundary of the objection lands in conjunction with development of any part of the site.

The floodplain of the Six Mile Water and any other watercourses within the site shall be identified prior to commencement of development. No built development shall take place within the identified area.

• The Plan should identify the indicative line of the Ballyclare Relief Road within the site on the relevant Maps.

• With the exception of the identified floodplain, the objection lands are excluded from the proposed LLPA BE 20.

Lands between Rashee Road and Doagh Road including the northern section of the Ballyclare Relief Road
(Objections 239, 331, 1413, 1886, 1978, 2717, 3448, and 3580. Note – individual objections to the Relief Road are not listed)

Objections sites 239 and 2717 are directly contiguous and comprise of an area of rough agricultural land fronting onto Rashee Road, just south of the junction with Cogry Road. Objection 1413 comprises of similar rough agricultural lands to the southwest and southeast of site 239/2717. Objection site 1978 c (as identified by the Department) encompasses the aforementioned sites, together with a number of fields to the north of housing zoning BE 04/04. Objection 1886 was not accompanied by a map, identifying the lands referred to. However, specific reference was made to the need for provision of the BRR to serve new housing development.

Objection site 1978 b comprises of various elements. It includes a number of fields to the west of zoning BE 04/04. It encompasses the grounds of Ballyclare Rugby Football and Cricket Clubs, which were the subject of objection 331. Objection 1978 b also includes lands within the draft Plan SDL in zoning BE 04/04, and both developed and undeveloped lands on the northern side of Doagh Road. There is an overlap with site 3448, with which we have dealt. Although included within the site, objection 1978 did not include any reference to zoning BE 21 in the Plan, which must be confirmed. The objection clearly cannot apply to the existing Highgrove housing development. The site includes zoning BE 05/07; however this is not specifically mentioned in the objection, unlike zoning BE 04/04. BE 05/07 and its KSRs must therefore also be confirmed.
Objections 239, 1413 and 2717 sought the inclusion of the lands within the SDL and zoned for housing. Objection 1978 sought inclusion of the lands within the SDL for housing, realignment of the BRR between zoning BE 04/04 to run north and west of the Rugby Club grounds, and amendments to the KSRs for the latter zoning. The objection was also to proposed LLPA BE 19 and the extent of the proposed LLPA BE 20. Objection 331 was to the BRR proposal and “all related policies including those requiring developer contributions”. It was argued that the road as proposed in the Draft Plan will adversely affect the usability and future viability of the Club due to the encroachment into existing playing fields used for rugby in the winter and cricket in the summer. It was stated that the Club does not have alternative lands into which it could relocate, nor would relocation be feasible. It was considered that the route of the proposed road should be altered to run outside the western and northern boundary of the Club facilities. These issues were echoed in many objections to the Relief Road proposal. There were also objections to the detrimental impact of the road scheme on residents and residential properties in the Highgrove development, which backs onto the Rugby Club grounds. Other objections specific to the road scheme cite difficulties with funding as a result of the draft Plan proposals. It was argued that the Club grounds should be zoned for sporting and recreational use only. An objector stated that the re-routing of the BRR as suggested would result in a safer layout. The impact of the proposed road on wildlife and public heath was also raised. The enforcement of traffic regulations in Ballyclare was cited as one method of reducing congestion problems in the town but this is not a matter that the Plan can address.

The Department indicated its view that 1978, in its entirety, was suitable for inclusion within the SDL for housing development. A list of suggested KSRs was produced at the Inquiry.

Whilst it would be possible to adhere to the line of the BRR shown in Plan amendment No.1, we accept that it would be a preferable approach to avoid disruption to the Rugby Club grounds, which we accept are a vital local recreational facility; this would also remove a potential obstacle to delivery of the road. Re-routing of the road along the suggested alternative route to the north and west of the Rugby Club grounds would preclude any significant detrimental impact on the residential properties in the Highgrove development, which could be considerable in terms of noise nuisance. The Club lands could be brought within the SDL and identified as open space in the Plan. They would benefit from the protection afforded to same by PPS8 policy OS1. The impact of the road on wildlife and the environment would be a matter for consideration during the processing of the planning application.

Plan amendment No. 1 incorporates a minor amendment to the proposed BRR line and marginally extends the SDL. Notwithstanding these changes, the road line falls outside any housing zoning for a stretch of over 0.5 km, from just north of housing zoning BE 05/07, to the Doagh Road. We accept the point made by the objectors that this is likely to result in practical difficulties in terms of delivery of the road. The objection site largely lies within a hollow in the landscape and is well screened from views from public roads. Whilst the existing field boundaries would not currently provide any strong definition to the new settlement edge, this could be addressed by buffer planting on the urban/rural interface. Although the site would result in a major westwards expansion of the settlement, there would be no major impact on the setting of the town as seen from existing vantage points. The masterplan submitted to the Department shows an
alternative route for the BRR, through areas of housing, which would be accessed therefrom. Delivery of the road would be secured by a KSR attached to the zoning. Given the circumstances, we consider that inclusion of the site within the SDL for housing would be acceptable and recommend accordingly.

With regard to the suggested KSRs, we are mindful that site 1978 b also includes housing zoning BE 04/04. Our comments on KSRs are set out in the introductory section. We recognise that a Masterplan has already been submitted to the Department in respect of the objection lands. This may not, however, be the only proposal relating to the site. We therefore consider it important that a KSR requiring a Concept Masterplan for this extensive site and other zoned housing lands to the south and east, connected by the BRR, should be adopted. The requirements in respect of housing density, and access to the site being agreed with the Department, are unnecessary. The KSR relating to a flora and fauna survey is not necessary, given that such issues will need to be addressed during the design process. The suggested KSR relating to the TA should be retained as it refers to other zonings; the traffic impacts of development on those other sites must clearly be factored into the exercise. In light of our consideration of site 3448, we have suggested an amended wording for that KSR. Specific mention of the BRR is clearly necessary. We do not consider that a KSR requiring an Article 40 Agreement is required to secure provision of the Relief Road and adequate infrastructure within the zoning as these matters are either within the ambit of regional policy or could be the subject of a planning condition. The landscaping of the site, and its subsequent maintenance, is a matter for the development management process, as will be the boundary treatments along the edges of the zoning and at the interface with the rural area. In this latter respect we note that regional policy will require substantial buffer planting. Flood risk is dealt with in PPS15 and a KSR relating thereto is unnecessary. The suggested KSR relating to watercourses is also unnecessary as the matters cited are for the development management process to address.

With regard to local neighbourhood facilities, we note that PPS 7 refers to development plans being the “principal vehicle for the identification of any local neighbourhood facilities required as an integral part of the development of zoned housing sites”. The explanatory text relating to policy QD 1 (d) also refers to the role of the development plan. Given this, and in the interests of providing clarity for developers, we do not agree with the objector that the suggested KSR should be deleted. Given the size of the site, we accept that 3 hectares would appear to be appropriate for provision of local facilities. We do not consider the wording of the KSR to be entirely inappropriate; the only uses specifically requiring to be provided are retailing and community facilities, both of which could accommodate various proposals. The exact range of uses can be determined at the development management stage. We see no need for ‘examples’ of possible uses to be stated.

In respect of objection site 1978 c, we do not accept that the lands would represent rounding off of the settlement limit. However, we do agree with the parties that they would represent a logical extension to Ballyclare. The lands are not prominent and would be suitable for development. We recognise that the lands fell within the SDL in the modified NAP 2005. Since production of that document, however, the regional policy context has greatly changed with the publication of the RDS.
Notwithstanding the proposal for the road line in the Masterplan submitted to the Department, we see no reason why the BRR immediately west of Rashee Road cannot be provided within zoning BE 04/04. Physically, the lands within 1978 c do not appear to be needed for provision of the road, unlike the lands within 1978 b. We are not convinced that the housing yield from development of 1978 c is critical to the delivery of the BRR. The yield from zoning BE 04/04 together with sites 1978 b and 3448 would be considerable. We anticipate a possible reduction in housing yield from zoning BE 04/02, due to the proposed SLNCI BE 16/02, and from BE 04/03, given its planning history. Taking this into account, sites 3448 and 1978 b are likely to result in an increased allocation to Ballyclare roughly commensurate with the recommendation in Part 1 of our report and there is no persuasive evidence that insufficient funding for the BRR would result. Site 1978 c would result in a yield well in excess of our recommended housing allocation for Ballyclare and we cannot, therefore, recommend its inclusion within the SDL for housing.

We have no explanation in respect of the objection to the proposed LLPA BE 19. We cannot thus consider the matter further. Our comments on the extent of LLPA BE 20 are set out in preceding paragraphs.

Our following recommendations take into account the assimilation of housing zoning BE 04/04 within a larger zoning comprising of objection site 1978 b. The recommended KSRs do not apply in respect of zonings BE 21 or BE 05/07.

**Recommendation**

We recommend that:-

- Objection site 1978 b is brought within the SDL and zoned for housing, subject to the following KSRs:-
  - A Concept Masterplan to facilitate the comprehensive development of the zoning, together with all other zonings through which the Ballyclare Relief Road will run, shall be submitted to, and agreed with, the Department. The Masterplan shall make provision within the proposed development for a local neighbourhood centre on approximately 3.0 hectares to include local retail outlets and community facilities. The range of uses shall be agreed with the Department at the development management stage.
  - A comprehensive TA shall be provided to analyse the overall impact of proposed housing, taking into account proposed housing developments on site 3448 and at zonings BE 04/02 and BE 04/03, and to identify any necessary improvements to the road network/public transport/transportation facilities in the area. In addition to the need for a TA, and the requirements identified therein, the entirety of the Ballyclare Relief Road shall be provided between Rashee Road and Doagh Road, running to the north and west of Ballyclare Rugby Club grounds, in conjunction with development of the site.
  - The Plan should identify the indicative line of the Ballyclare Relief Road within the site on the relevant Maps.
- The grounds of Ballyclare Rugby Club, as defined in objection 331, are identified in the Plan as existing open space.

**OBJECTIONS TO HOUSING ZONINGS**

**BE 03/04 – Lands to the east of Ballyeaston Road**

(Objections 1689/4 and 3231)

The objections sought the amendment or deletion of the KSRs. The Department indicated that planning approval had been granted on the site and that the attached conditions were considered sufficient to allow for a satisfactory form of development. We note that development has taken place and recommend that the KSRs are deleted.

**Recommendation**

We recommend that the KSRs are deleted from the Plan.

**BE 04/02 – Land at Ballycorr Road [also to SLNCI Designations BE 16/01 - Craighill Quarry, and BE16/02 – Craighill Quarry (Geodiversity)]**

(Objections 1689/3, 5, & 6, 1934, 1936, 1966, 2733, 3237, 3239, and 3520/1)

Objection 1934 was to proposed designation BE 16/02. Objection 1689 was to that designation and also to BE 16/01. Objections 3237 and 3239 were to both SLNCIs and also to their designation as AOCMDs, however, no reasoning for the objections was put forward. Objection 1936 stated that the BE 16/01 designation is at odds with proposed housing zoning BE 04/03. Although objection 2733 referred to SLNCI policy and the area of geodiversity, there was no explicit objection in respect of either of the subject designations.

Our comments on AOCMDs are contained in Part 1 of our report. The Department considered that the Geodiversity SLNCI BE 16/02 should be deleted from the Plan and that the BE 16/01 designation should be reduced in size to an area of woodland in the southern corner of the original SLNCI, within housing zoning BE 04/02, as shown on the attached Plan No. 6. The representative for objector 1689 indicated agreement with this position. We consider the Department’s suggested amendments to be logical, given that the features of geological interest have been removed and that the reduced area for BE 16/01 contains the features of greatest nature conservation interest on the site. We recommend accordingly.

With regard to housing zoning BE 04/02, objection 1689 was to all of the KSRs affecting the site. 1689/3 specifically refers to KSR 9, which excludes development from the northeastern section of the site included within the proposed BE 16/01 SLNCI. The Department explained that a mapping error had occurred. This designation has been greatly reduced in extent and now lies entirely within zoning BE 04/02. The Department conceded that the KSR fundamentally conflicts with the housing zoning. It was accepted that the SLNCI could be utilised as open space for the housing and that some
development could possibly take place in the western portion of the designation; it was conceded that management of the designated area could be beneficial. The Department considered that the KSR wording should be amended to clarify the situation. In our opinion, and given the Department's comments, we consider that a KSR preventing development in the SLNCI is inappropriate; we consider that policy ENV 2 in the plan will be sufficient to ensure that development takes the presence of the designation into account and we recommend that the 9th KSR is deleted. We agree with the objector that KSRs 6, 7, and 10 are matters that will be determined or dealt with at the design stage, or during the development management process, and should be deleted from the Plan. The Department indicated its view that density of development is a matter for regional policy in PPS7 and will be determined at the development management stage; the 2nd KSR could therefore be deleted. In the evidential context we do not demur with this analysis. We were not presented with any convincing evidence to support the removal of KSR 11 and it should therefore be retained. We note the presence of important vegetation within the zoning and consider that the deletion of KSR 8 would thus be inappropriate.

Objection 1966 was to KSRs 3, 4 and 5. With regard to the first of these, it was accepted that the primary vehicular access should be from Ballycorr Road, however it was argued that there should be added flexibility so that pedestrian access from Ballyeaston Road can also be provided, plus a road link through to another proposed residential development to the north. The Department provided no explanation justifying the KSR. We see no reason why, in the interests of permeability, that additional vehicular accesses could not be provided. We see no impediment to pedestrian access to Ballyeaston Road; this would seem to be an eminently sensible provision. The development management process can determine the appropriate access arrangements. We consider that KSR 3 should refer to ‘primary vehicular access’ in order to provide flexibility.

We note that the outline approval in 2006 for 60 dwellings on a sizeable portion of the site did not involve a requirement for a contribution towards the BRR. The Department explained that the TA supplied with the application demonstrated that up to 60 dwellings could be constructed on the zoning without provision of the BRR. Although this appears to support the objector’s submission that there is no direct relationship between this housing zoning and the BRR, we note that the approval did not relate to the entirety of BE 04/02. Any additional traffic generated by housing on the rest of the site could add to the burden on Ballyclare’s road network. It is inevitable that this would exacerbate the congestion in the town centre at peak periods and it is this congestion that has resulted in the BRR proposal. It is clear that the impact of additional traffic can be predicted through a TA and we consider that such should be a KSR for any future housing proposals on this zoning and the adjacent BE 04/03, given their physical interrelationship. Also, in view of the particular problems created by the ‘bottleneck’ of Ballyclare Town Centre, where traffic heading from or towards the A57 inevitably converges at the southern end of Main Street, we consider it critical that the potential cumulative impact of the additional undeveloped zoning at BE 04/04 is taken into account. It is incumbent upon developers to contribute to infrastructure that is required to accommodate new development and it is clear that the BRR is likely to be needed if Ballyclare’s road network is to cope with the load from additional large housingzonings. The 4th KSR merely states that the BRR shall be provided and funded by developers. This statement clarifies the situation. It would be for the TA to identify infrastructural
needs required for each particular development proposal. At the Inquiry the Department stated its view that only zoning BE 04/04 requires the provision of the relief road. The approval for 60 units on the subject zoning, without a contribution to the BRR, demonstrates that the absence of the new road is not necessarily an impediment to development. We consider that the 4th KSR should be retained. We see no need to amend the wording of the KSR to recognise the approval for 60 units or the future construction of the relief road; such factors would be obvious material considerations in any future planning application.

We have commented on the use of Article 40 agreements in our introductory notes. We have concluded that such agreements should not be the subject of KSRs in the Plan. We recommend accordingly.

**Recommendation**

In respect of the proposed SLNCI designations, We recommend that SLNCI BE 16/01 is reduced to the area shown cross-hatched on the attached Plan No. 6 and that SLNCI BE 16/02 is deleted from the Plan.

With regard to housing zoning, we recommend that:

- The third KSR should be amended to read “Primary vehicular access to the site shall be from Ballycorr Road”;
- KSRs 2, 5, 6, 7, 9, and 10 should be deleted from the Plan.

**BE 04/03 – Land at Craighill Quarry**  
(Objections 1689/2, 3235, 3480, 3520/2)

We have already considered the objections relating to the SLNCI designations BE 16/01 and BE 16/02. The latter is to be deleted from the Plan. We note that the remaining reduced BE 16/01 designation does not affect the BE 04/03 housing zoning.

Objection 3235 was to the KSRs affecting the site. Objection 3520/2 was to all of the KSRs and, specifically, to the requirement that the BRR shall be provided and funded in whole through developer contributions. No reasoning was submitted by either objector in justification of their cases.

Objection 1689 was to all of the KSRs affecting the site. It was argued that the KSR relating to density is inappropriate to the characteristics of the zoning. Our conclusions on density KSRs are set out in the introductory notes. Density is a matter within the ambit of the design process and regional policy. In the absence of any explanation from the Department as to the necessity for the KSR, we recommend its deletion.

With regard to KSR 4, we reiterate our comments on the TA requirements and the BRR as set out in our consideration of objections relating to zoning BE 04/02. We recognise that Planning Service has approved a significant number of residential units within Ballyclare and that other zoned sites within the town are not affected by the same KSR. We note that many of the zoned sites were committed lands where development was
approved prior to the publication of the draft Plan and do not accept that there has been a complete lack of consistency with regard to KSRs in the Plan. We accept that there are matters relating to the BRR, which developer financial contributions will not solve, such as land acquisition and decisions regarding the final alignment of the road, however these issues do not justify setting aside the subject KSR. We do not agree that the approval on a large portion of the zoning without the requirements imposed by the KSR renders it obsolete, given the specific characteristics of the proposal for a retirement village.

With regard to KSR 5, we note that PPS 7 refers to development plans being the “principal vehicle for the identification of any local neighbourhood facilities required as an integral part of the development of zoned housing sites”. The explanatory text relating to policy QD 1 (d) also refers to the role of the development plan. Given this, and in the interests of providing clarity for developers, we do not agree with the objector that the 5th KSR should be deleted. The viability of facilities and the range of uses provided would be matters for the development management system to consider. We do not consider the wording of the KSR to be unduly prescriptive and the only uses specifically requiring to be provided are retailing and community facilities, both of which could accommodate various proposals.

Our comments on KSRs referring to Article 40 agreements have already been stated and we consider that the 6th KSR should be deleted. Matters covered in KSRs 7, 9, and 11 will be determined or dealt with at the design stage, or during the development management process, and should be deleted from the Plan. With regard to KSR 8, we were not presented with any convincing evidence to support its deletion from the Plan.

We agree with the objector that the requirement for an archaeological survey as per KSR 12 would seem to be unnecessary over the parts of the zoning which have been disturbed by quarry operations and excavation. These areas could be easily identified during the design process. The Department indicated that a previous survey on part of the site had identified possible 12th century remains and these can be taken into account through the development management process. The witness indicated that the KSR was only relevant to the area around the northeast site boundary. Since the survey work would obviously not need to be repeated on this part of the site, the KSR is unnecessary and should be deleted.

Objection 3480, in addition to several of the above matters, objected to KSRs 10 and 13. The issue of buffer planting along settlement limits is dealt with by regional policy and a specific KSR is therefore unnecessary. With regard to KSR 10, we were provided with no reasoning by the objector to justify its deletion. Given that the KSR is designed to protect peregrine falcons using the site, we consider its retention in the Plan to be important.

Given that all of the KSRs are before us, we consider that bullet point 3, which states the obvious, should be deleted.

**Recommendation**

We recommend that:-
- KSRs 2, 3, 6, 7, 9, 11, 12, and 13 should be deleted from the Plan.

**BE 04/04 – Land adjacent to Rashee Road and Cogry Road**

(Objection 2947)

We have considered the Department’s suggested KSRs in respect of objection site 1978, which includes zoning BE 04/04. Here, we consider the KSRs relating to the latter in isolation.

Objection 2947 was to several of the KSRs affecting BE 04/04. Our conclusions on the approach to KSRs are set out in the introduction to this section of our report. We consider that the KSR requiring submission of a Concept Masterplan for this large site should be retained. Regional policy makes provision for the requirements of KSRs 2, 3 and 12. KSR 4 should be retained as it refers to other zonings, the impact of which must be factored in to the TA. KSR 5 relates specifically to the BRR and is clearly necessary. We do not consider that a KSR requiring an Article 40 Agreement is necessary to secure provision of the Relief Road and adequate infrastructure within the zoning as these matters are either within the ambit of regional policy or could be the subject of a planning condition. KSR 7 should therefore be deleted and the reference to provision of the BRR within the site inserted into KSR4. The landscaping of the site is a matter for the development management process, as will be the boundary treatments along the southern and eastern sides of the zoning and at the interface with the rural area. In this latter respect we note that regional policy will require substantial buffer planting.

With regard to KSR 6, we note that PPS 7 refers to development plans being the “principal vehicle for the identification of any local neighbourhood facilities required as an integral part of the development of zoned housing sites”. The explanatory text relating to policy QD 1 (d) also refers to the role of the development plan. Given this, and in the interests of providing clarity for developers, we do not agree with the objector that the 6th KSR should be deleted. This is a large site and we do not agree with the objector that the town centre or existing facilities are so proximate as to obviate the need for the KSR. In the context of BE 04/04 on its own we do, however, accept the objector’s argument that 3 hectares would appear to be an unnecessarily large area for provision of a local neighbourhood centre. We note the KSR attached to the 25ha zoning BE 04/03 was for a 1.5ha area to be set aside for such facilities. We consider that a similar scale of provision should be made on the subject zoning.

**Recommendation**

We recommend that:-

- KSRs 2, 3, and 7-12 are deleted from the Plan.

- The last sentence of KSR 4 is reworded as follows – “In addition to the need for a TA, and the requirements identified therein, the entirety of the Ballyclare Relief Road shall be provided between Rashee Road and Doagh Road in conjunction with development of the site.”
• The wording of KSR 6 should be amended to refer to provision of local neighbourhood facilities on approximately 1.5 hectares of the zoning.
EMPLOYMENT

Objection to Employment Zoning BE 06 (also seeking an extension to the SDL)
(Objections 798 and 801)

These objection sites overlap. The land lies on the western side of Hillhead Road and
abuts the southern side of the A57. It comprises a large field which is fairly level near
the latter road then rises markedly towards the south and the settlement of Hillhead.
The SDL in the draft Plan is undefined within the subject field. The objections were to
the zoning of part of the site for employment/industry and the exclusion of the remainder
of the field from the SDL. Objection 801 sought housing on the site. We were advised
that planning approval for a new livestock mart, various retail units and associated car
and lorry parking had been approved in 1996 and that development had commenced. A
2000 approval was also raised. The objector’s stage 2 submission referred to an
element of retailing being sought on the site; we do not propose to consider this aspect,
which is outside the scope of the original objection, irrespective of its inclusion in the
1996 approval. The Department considered that BE 06 could be zoned for a mix of
housing and employment at a ratio of 70:30, respectively.

The status of the lands in the previous Area Plan does not fetter our consideration of
BMAP proposals. We have no definitive evidence to support the objector’s submission
that the development approved in the 1996 consent was commenced through the
construction of the access to the site in 1999. We are unsure if the remainder of the
development could be completed. If it could, this would appear (from our examination of
the approved plan) to involve construction of an area of car parking that would
marginally protrude beyond the proposed SDL in the draft Plan. However, the vast
majority of the approved development would seem to lie within the draft Plan’s proposed
SDL.

We do not agree with the objector that Hillhead and Ballyclare should be permitted to
merge. The rising land between the two settlements is exposed and prominent and
development thereon would be very visible from the A57, Hillhead Road and from
various locations throughout Ballyclare. We consider the retention of as much of the NY
04 RLW as possible, to be critical. We therefore disagree with the Department’s
concession that the boundary of BE 06 should be amended southwards to mirror that of
BE 07. We note the absence of buffer planting in the 1996 approval and accept that its
full implementation would leave the SDL within the objection site largely undefined.
However, the approved drawing shows a substantial area of undeveloped land between
the car park and retail units and the southern boundary of the field. This undeveloped
area represents the highest and most prominent part of the field and would be critical in
maintaining a physical gap between the two settlements. We do not accept that the
objector’s offer of buffer planting would provide adequate separation or justifies
extension of Ballyclare’s urban limit to abut that of Hillhead. We do not accept that
housing development on the site would necessarily have a ‘softer’ impact on the
landscape than the commercial development approved in 1996.

We accept that easy access exists from the site to the A57 and that provision of
additional housing in Ballyclare would be possible in the short term without adding to the
traffic congestion problems in the town centre. However, such development would
redirect housing demand to this side of the town and would thus prejudice the early provision of the BRR, notwithstanding the objector’s offer to contribute to roads infrastructure in the town. We do not consider that the growth of Ballyclare must take place at any cost and we note that the economic downturn has reduced the ‘pressure’, referred to by the objectors, for new house building in Ballyclare.

In addition, and irrespective of the objector’s arguments regarding the methodology used to identify employment land, we have not been provided with any evidence that development of part of the site for housing would leave an adequate supply of zoned employment land in Ballyclare, which is identified for significant growth in the RDS. Such growth must also include uses, other than housing, such as employment and industry. The subject site is well located for employment uses, close to the A57, and this favours its retention for that purpose. The Department’s position would reduce the land available for employment uses on the zoning by 70%, which may greatly affect its potential to attract developers. The offer of affordable housing on the site does not outweigh our conclusions. We disagree with the Department’s conclusions and recommend no change to the Plan as a result of the objections. The KSRs put forward by the Department at the Inquiry related to a mixed use development on the site and need not, therefore, be considered.

**Objection to Existing Employment Zoning BE 07**
(Objection 1208)

This site lies on the eastern side of Hillhead Road, opposite zoning BE06, and exhibits a comparable topography. The original objection sought extension of the employment zoning to include lands to the south. The objection also referred to housing on the land. The site was subsequently reduced to mirror the BE 07 zoning in the draft Plan. There was no objection to the Plan housing zonings BE 02 - BE 05; however, it was argued that the objection site was preferable. Reference was made to planning approvals in 1998 and 2002 for a warehouse and distribution facility and ‘works ….. to facilitate future development’ on the site, respectively. The Department stated that some works have been carried out on the foot of the 2002 approval. It considered that BE 07 could be zoned for a mix of housing and employment at a ratio of 70:30, respectively.

We do not accept the objector’s argument that the site should not be zoned as existing employment land simply because it remains vacant. There is clearly planning history that points to the land having been available for employment use in the past and we consider this justifies the Department’s approach to the zoning. However, we consider that it would have been more accurate to describe the zoning as proposed employment land. The objector submitted that there is no demand for the site. It was stated that the 1998 approval was not pursued as a result. We acknowledge that the site remains undeveloped but the anticipated significant growth of the town may result in an increased demand for employment land in the future, which must be provided for in the Plan. As with BE 06, the subject site is well located for employment uses, close to the A57, and this favours its retention for that purpose. The Department’s comment that a Plan review can address any shortfall is not a realistic means to address its obligation to ensure a generous and continuous supply of employment sites of an appropriate size. We note that the anticipated take up of employment land in Ballyclare is 1.7ha per annum and that there are 19ha of undeveloped zoned employment lands in the
settlement. We do not consider this to represent significant over-provision. The availability of employment land at Ballyhenry or Mallusk does not justify potentially inadequate provision in Ballyclare.

We do not consider that development related to employment uses need be any more detrimental to visual amenity, or the NY 04 RLW, than housing; there is no design carte blanche for buildings for employment uses and the issue of visual impact can be addressed by the development management process. Housing development on rising land to the north of the A57 does not, in itself, justify similar on its southern side. We note that the KSRs for BE 07 already include a requirement for buffer planting of 5-10m along the southern boundary.

As with our conclusions on BE 06, we accept that easy access exists from the site to the A57 and that provision of additional housing in Ballyclare would be possible in the short term without adding to traffic congestion problems. However, we reiterate our concerns regarding redirection of housing demand, prejudicial to the early provision of the Relief Road. We do not accept that housing supply in Ballyclare has dried up and we note the ongoing developments in various parts of the town. We recognise that the objector’s comments were made at a time of unprecedented growth in the housing market, which has since ceased. We do not prefer the objection site to the housing zonings in the Plan, which refer to the provision of the Relief Road. Other than raising the latter issue, the objector has not explained how the housing zonings are flawed. We again disagree with the Department’s conclusions on the objection and recommend no change to the Plan. The KSRs put forward by the Department at the Inquiry related to housing development on the site and need not, therefore, be considered.

Objection to Existing Employment Zoning BE 10
(Objection 1400)

This site contains a large, disused commercial building, which is currently advertised to let. A smaller commercial unit is located in the southern apex of the site, with a separate access to Hillhead Road. This is in use as a meat processing facility. The original objection sought zoning of the site for housing. The Department considered that the site could be zoned for a mix of housing and employment at a ratio of 70:30, respectively. We were advised that planning permission for a food superstore had been sought on the site but are unaware as to the progress of the proposal. The objector referred to retailing on the site, or its zoning as a DOS, in his later submissions; however, these issues are outside the scope of the original objection and cannot be considered further. In any event, the objector was satisfied with the Department’s position and accepted that the retailing proposal would be dealt with through the development management process.

Our conclusions regarding access from the site to the A57, provision of additional housing at this location, and employment land supply, are as set out in our consideration of the two preceding objections. For reasons already stated in respect of BE 06 and BE 07, we do not favour zoning of BE 10 for mixed use development to include 70% housing, as advocated by the Department. The site should remain zoned for employment use only and we therefore recommend no change to the Plan as a result of the objection. The proximity of the site to the town centre, and its accessibility,
is not a factor that outweighs our conclusions. As we have rejected the proposal for housing on the site we need not consider the KSRs suggested by the Department.

**Objection to Existing Employment Zoning BE 11**
(Objection 3204)

This objection sought a change from the existing employment zoning to zoning as a DOS for housing.

The site is currently in commercial use by Dennison Volvo and contains a large complex of buildings. Given the beneficial use of the site, it would be inappropriate to zone it as a DOS. We note that no reasoning was advanced in support of the objection. We recommend no change to the Plan.

**Objection to Existing Employment Zoning BE 12**
(Objection 3279)

The objection sought deletion of the employment zoning and identification of the site as a DOS for retailing. We note that the site has been redeveloped and now contains a Lidl store. Given this, it would not be appropriate to zone the land as a DOS. In view of the site’s current use, we recommend the zoning is deleted from the Plan.

**Recommendation**

We recommend that zoning BE 12 is deleted from the Plan.
NATURAL ENVIRONMENT

OBJECTIONS RELATING TO SLNCIS

For objections to SLNCI Designations BE 16/01 - Craighill Quarry, and BE16/02 – Craighill Quarry (Geodiversity) see our conclusions on housing zoning BE 04/02

Objection seeking additional SLNCI designation – Six Mile Water Flood Plain
(Objection 1496/3)

The Antrim and District Angling Association argued that the flood plain of the Six Mile Water immediately upstream of Ballyclare should be designated as a SLNCI. It was submitted that this is an important flood plain and the objector has concerns that proposals for built development in and around this area are damaging to conservation and fishing interests. It was argued that this area could be used to control/reduce flooding downstream.

We were not supplied with a plan to show the extent of the suggested SLNCI designation. We note that the proposed BE 18 LLPA already incorporates a large part of the flood plain of the Six Mile Water, upstream of Ballyclare. One of the features of the LLPA listed in the Plan is the local nature conservation interest of the low lying wet land and valley slopes. Whilst we recognise that most rivers will exhibit features of nature conservation interest, this in itself does not justify a SLNCI designation in every case. We were not presented with any convincing evidence that the flood plain of the Six Mile Water in the location referred to merits designation as a SLNCI. The LLPA designation will confer a similar degree of protection in any event and regional policy presumes against built development on flood plains. The potential role of the area in flood control is not a matter for a development plan to address. We recommend no change to the Plan as a result of the objection

OBJECTIONS TO PROPOSED LLPAS

Six Mile Water Corridor - BE 18

Objection 1288

The site comprises the grounds of the Elim Church at Mill Road. This objection was to the inclusion of part of the site within the LLPA, beyond the adjacent identified open space. The objection also referred to the absence of a development zoning on the site.

The Department commented on the possibility of housing on the site; however, the objector did not state what land use zoning was sought. In the circumstances, we are unable to deal with the issue further. Notwithstanding this, the site is within the SDL where various land uses may be acceptable and the development management system exists to consider any proposal that may come forward.
As stated by the Department, the only part of the objection site included in the LLPA is the area containing trees to the north-west and south-west of the car park. BE 18 does not include the land covered by the church building, the hard surfacing of the car park and access, or the tree planting fronting Mill Road. We concur with the Department’s view that the woodland is a valuable nature conservation asset within an urban area and serves both as a green corridor and as a buffer to the Six Mile Water. We agree that the woodland forms part of the landscape framework of the adjacent Six Mile Water River Park and the setting of the river corridor and is of high amenity value. We consider that the boundary of the LLPA should not be amended as a result of this objection.

Objection 3558/6

The site is located on the eastern side of a large filling station complex at Templepatrick Road. It contains an area of tarmac-surfaced car parking and fenced-off storage facilities. The Six Mile Water runs along the northern edge of the site. The objection sought removal of the car parking area from the LLPA. The Department considered that the aforementioned area should be excluded, but that the river and riverbank should be retained within the designation. We note that the objection site does not appear to include the river or its bank. We agree with the Department’s analysis in respect of the car park. The storage areas relate to the adjacent commercial use and should also be excluded from the LLPA. We recommend accordingly.

Recommendation

We recommend that the objection site is excluded from the BE 18 LLPA.
OPEN SPACE, SPORT AND OUTDOOR RECREATION

Land to west of Mill Road
(Objection 1939)

This objection referred to identification of land as open space at “the car park situated west of Mill Road” and submitted that this is an inaccuracy in the Plan. There are two areas of car parking west of Mill Road, one adjacent to Avondale Drive and the other opposite the dwelling at No. 137.

Whilst these car parks are clearly not ‘green’ spaces, they are integral parts of the surrounding recreational lands, with which they are connected. We do not therefore consider that their inclusion within the area identified in the Plan as open space to be misleading or erroneous. We recommend no change to the Plan as a result of the objection.
BALLYCLARE TOWN CENTRE

DEVELOPMENT OPPORTUNITY SITES

Objection seeking inclusion of site within DOS Zoning BE23
(Objection 3765)

The site comprises a small area of landscaping together with part of the car park of the Sixmile Leisure Centre. The objection sought deletion of the open space identification, and inclusion of the site within the adjacent DOS BE 23.

No reasoning was submitted in support of the objection. The land is within the grounds of the leisure centre and is an integral part of its car park, with no features distinguishing the site from its surroundings. It is not physically part of the adjacent BE 23 zoning, which appears to be in commercial use. The land is clearly not vacant or under-utilised land and should not be incorporated into the adjacent DOS.

We note that the Plan identifies open space for information only. In this particular instance, both the leisure centre and its car parking are identified as falling within a larger area of open space. We have recommended elsewhere that recreational buildings and their associated car parking need not be identified as open space. In this case, however, there is no objection in respect of either the leisure centre or the car park outwith the subject site. The latter contains a significant landscaped area as well as hard surfacing. Given this, and in the interests of consistency, we consider that it should continue to be identified as open space in the Plan.
URBAN ENVIRONMENT

Objection to Urban Design Criteria for Ballyclare Town Centre - Policy BE26
(Objection 2760/50)

The objector considered that BE26 should take the form of Supplementary Design Guidance, rather than Policy.

UE1 contains the policy in respect of the application of the Urban Design Criteria set out in other parts of the Plan. BE26 sets out the Criteria to be implemented through application of UE1. We note that the criteria in BE 26 are soundly based on an analysis of Ballyclare Town Centre, as contained in Technical Supplement 6 of the Plan. We do not accept that it is inappropriate for BE26 to be adopted as a policy in the Plan and recommend no change as a result of the objection.
NEWTOWNABBAY VILLAGES

General Objections to the Settlement Limits of Villages
(Elevate Objections 1700, 1770, 1772, 1774, 1775 and 1779)
(TA Objections 878, 1436 and 1937)

Elevate made objections to every village settlement limit. We propose to deal with them and other general objections generically in this section. The rationale for each settlement limit is set out in the relevant section of the Plan. The RDS in chapter 8 at SPG-RNI 3 states that within the BMA the strategy is to consolidate villages and resist their large-scale expansion. The RDS favours expansion at Newtownabbey, but this is a reference to Metropolitan Newtownabbey and not the rural area. We have recommended that the limits of villages are strictly controlled in Part 1 of our report with several exceptions related to small scale expansion of certain villages for particular reasons. We cannot therefore agree with the generic argument that the settlement limits are too restrictive. We consider that the limits generally allow for sufficient growth in the context of villages being towards the bottom of the settlement hierarchy and that there are opportunities for further development within limits. To this extent we generally support the counter-objection by Ballyrobert Community Association. We have specifically concluded that the existing housing land provision in Doagh is sufficient and that no further allocation is required (paragraph 3.2.83 refers).

Turley Associates reference to the settlement hierarchy in NAP to argue that the villages had a complementary role to Ballyclare in the rural area was actually seeking an increased allocation to several villages. Whilst we acknowledge the complementary role of villages, we concluded strategically that the allocation to the villages is already generous. The RDS and Plan Strategy have taken balance and choice in the area into account in arriving at the housing figures for the villages, as discussed above. Similarly any infrastructure constraints in Ballyclare should be addressed there and cannot be used to justify an increased allocation to the villages either at the expense of or in addition to the allocation for Ballyclare. We reject this argument.

Ballyeaston is a hilltop village of distinctive character with several important locally significant buildings and monuments. It contains an Area of Village Character designation in the Plan. Any development should be strictly controlled to ensure that the distinctive character of the village is not detrimentally affected. The release of further land for development would lead to a demand for improved footpaths, etc. in the village, which would be inimical to its distinctive character. The village also has little in the way of facilities and is in close proximity to Ballyclare. We do not consider that it is a suitable candidate for further growth, contrary to the Department’s opinion.

We note that 22 dwellings have been constructed and occupied on the site of a single former dwelling at Ballylagan Road in Straid. We also note that several developments are underway in Ballyrobert replacing dwellings on large plots with more intensive residential developments. We do not have any figures for the total number of dwellings involved. None of these dwellings have been included in the Department’s figures in the Plan or relevant technical supplements. These developments also illustrate the point we made above that re-development opportunities exist even at the village tier of the settlement hierarchy.
Notwithstanding the arguments to the contrary, the villages of Ballyrobert and Cogry/Kilbride have few facilities. The rail line near Ballyrobert is not open and there is no station nearby on the main line. The offices in Cogry/Kilbride have not been constructed. The proximity of both villages to Ballyclare and the main road network is an argument for the concentration of development in the district town in accordance with the RDS and sustainability principles rather than in these villages. In fact, all villages are in relatively close proximity to either Ballyclare or the Metropolitan area or both. We shall address any social housing arguments on a site by site basis. The objections did not specify any sites for inclusion and therefore we cannot consider the inclusion of any land as a result of these objections anyway. We shall consider the individual site specific objections received below. We recommend no change to the Plan as a result of these objections.

BALLYEASTON

Lands at Ballynashee Road
(Objection 1488)

The field containing the site is relatively level for a short distance and then slopes up to the north. Its roadside boundary is defined by a mature hedge and it has hedges to the northern and eastern boundaries. Views from Trenchill Road to the south are limited because of the buildings along that road. The site can be seen from Ballynashee Road and obviously views of the site would be opened up in order to provide access, if it were developed.

Notwithstanding the presence of a single dwelling to the west of the site, the proposal would result in the expansion of the village northwards. The site is not a notch in the settlement limit. The northern boundary of the site is undefined and presumably has been chosen to align with the curtilage of the dwelling to the west. The objection referred to the landscaping of the remainder of the field, although this is outside the objection site. The site is within the extensive LLPA BN 04 and there was no objection to this Designation in relation to the site. The objector’s statement of case indicated that the adjoining church was the important feature and its setting was protected by the LLPA. This accords with the features of the Designation listed in the Plan. There is a reference to development being confined to the eastern part of the site in the statement of case. The extent of this area is not identified on any plan or photograph. Limiting development in this way would only serve to create an even more illogical protrusion in the settlement limit.

The development of the site would result in expansion of the village to the north and could have a detrimental effect on the LLPA. This would in turn impact negatively on the setting of the locally significant Church building and graveyard. The northern boundary of the site would be undefined and it would take time for the promised landscaping to provide any definition for the proposed limit. This would also be the case for the promised buffer zone between the Church and the site. We recommend no change to the Plan.
**Lands south of Trenchill Road**
(Objections 944, 3457 and 3468)

The agents confirmed in the statement of case that the objections to the AVC (BN 03) and LLPA (BN 04) were not being pursued because the designations were accepted as being necessary to ensure a high quality of development. We will obviously still address the impact of development on the LLPA and key features. The site is within Ballyeaston RLW (Designation NY 03), however this has not been raised as an issue by the Department and is not the subject of any objection. We consider that the release of this site for development would have little impact on the function of this RLW because of its location and relationship with the SDL.

A strip of land along the road frontage is not included in the objection site presumably because it is already within the SDL. The objectors (Ballyeaston Presbyterian Church) own this strip also and it is in use as an overspill car park. Access is obviously available through this land and so the Roads Service comments that the site has no road frontage are irrelevant. The roadside field boundary is open for the most part. The northern boundary of the site is defined by an open rail fence enclosing the car park.

The remaining three boundaries of the site are mostly defined by mature hedges and trees. The site is relatively flat and then the land slopes down to the south. It is surrounded on three sides by the SDL and therefore reads on plan as an indentation in the limit. The Department acknowledged that the inclusion of the site would lead to a compact urban form and better definition for the SDL. We agree with this assessment and consider that the issues relate to the requirement for any additional lands in the village and the impact on the key features of the LLPA.

The site is between an old Church and a locally significant Manse both included in the list of features of LLPA BN 04. St. Augustine’s is now in ruin, but the majority of walls are still standing. The site has been in use since the fifth century and the current Church was built in 1786 (the church has been disused since 1894). It can be clearly seen in its roadside location as one travels along Trenchill Road. The Manse is a good example of this type of church-related dwelling. It is well-enclosed by vegetation, but can be clearly seen from the east due to gaps in the trees on this boundary. We consider that the Manse and old Church are very important features of the village. Development on the site would adversely affect the setting and views of them and would have a detrimental effect on the AVC. The site was included within the settlement limit in the NAP as proposed open space. Its open nature free of development was thus assured in that plan’s provisions. The site extends to 0.7 hectares (the site does not include the car park) and development on this scale would also not be acceptable in the context of this village and its character. We recommend no change to the Plan.
BALLYNURE

Land at Lismenary Road
(Objection 602)

The site lies outside the BMAP boundary and within Larne Borough. We cannot therefore consider this objection. We note that the Department considered that the site (consisting of a dwelling and a large curtilage) was suitable for inclusion within the settlement limit. The Department requested that if the site were to be considered more appropriate than other sites (no location specified, but presumably this means in Ballynure) then it should be referred to the emerging Antrim, Ballymena and Larne Area Plan team for consideration. We make no comment on this request as the site is outside the Plan area and any shortfall in housing provision in the BMA cannot be resolved in the context of an adjoining Area Plan.

Lands between Larne Road and Toberdowney Valley
(Objection 3046)

The site was amended to three fields running northwards from Larne Road to the rear of properties on the east side of Lismenary Road. The first field adjacent to Larne Road has a roadside hedge that ends some 70m from the SW boundary. This field is relatively flat and has trees separating it from the park and demolished dwelling to the SW. The eastern boundaries are formed by some trees and a hedge with significant gaps in the vegetation. The middle field slopes up to the north to a crest and then the northern field slopes down gradually to the north. The dwellings inside the limit can be seen over a mixture of boundary treatments. The NE boundaries of these two fields are defined by substantial trees and hedges. There is a very large electricity pylon in the adjoining field and wires traverse the site. The NW boundary adjoins a small green area at the entrance to Toberdowney Valley.

We do not agree with the objector that this large site either sits into the urban form or fills in notches in the settlement limit. The site extends out from the built form of the village to the NE, particularly in the case of the field adjoining Larne Road. Castle Manor on the opposite side of Larne Road reads as a very different context due to the presence of older roadside development and its elevation above the road level. Development on the site would be quite prominent in views from Larne Road and the SDL formed by the northern boundaries of field one would not be substantial. We consider that the site of 3.4 hectares would also be too large for the needs of Ballynure.

Roads Service indicated that access onto Larne Road would not be acceptable because it is a protected route and an access would interfere with traffic flow and an adjoining bus stop. An alternative access onto Toberdowney Park could only serve 25 dwellings, according to Roads Service. The objectors considered that this would limit the yield of the site and render it acceptable. We have stated elsewhere that we must consider sites in terms of the overall site area and the yield that this area could provide at 25 dwellings per hectare. There could be alternative access arrangements made if the site was brought within the SDL. There are plans for a by-pass around Ballynure and a preferred route to the north of the village was announced in August 2009. When the bypass is built Larne Road would no longer be a protected route and access from there
would be acceptable. The site of the adjoining demolished dwelling on Lismenary Road and Toberdowney Valley itself are other possible access points.

Although access issues could be overcome, we do not favour inclusion of the site for the reasons set out above and therefore recommend no change to the Plan as a result of this objection.

**Land East of Larne Road**  
(Objection 67)

This is an elevated field to the NE of the village. The field appears prominent to views from Larne Road on entering and leaving the village from/to the north. The adjoining housing development is at a higher level and separate from this agricultural land. The existing SDL is therefore quite well defined. Development on this site would lead to significant expansion of the village to the NE in a fan-shaped manner largely unrelated to the existing village form and would be prominent. We recommend no change to the Plan.

**Lands north of Castle Road**  
(Objection 3050)

The objection site was amended to relate to the field adjoining Castle Manor only. The roadside boundary consists of a low hedge and bank for a short distance and then mature trees. The SDL is defined by mature trees with gaps and the dwellings in Castle Manor can be seen from the site. The NW and NE boundaries are defined by mature trees and hedging and trees. There is a row of dwellings on the opposite side of the road, some of which are part of a new development served by Castlebrook Avenue.

As one travels along Castle Road there is a definite sense of arrival in the countryside once one arrives at the site, despite the dwellings on the other side of the road. The site does not sit into the urban form and development would lead to expansion of the village, albeit in line with the development opposite. Visibility requirements for the access are likely to result in the loss of the roadside trees. This would open up views of the site from the road. The site is elevated above Larne Road behind objection site 67 discussed above. Development would appear elevated in views from Larne Road, however this effect is mitigated by the trees along that boundary and the fact the existing Castle Manor development is at a similar height. We consider that on balance the site is not acceptable and recommend no change to the Plan.

**Lands south of Castle Road**  
(Objections 1925 & 3044)

Objection site 3044 comprises two fields that are level with the road for a short distance and then slope down to the Castle Water to the rear. The roadside boundary adjacent to Castlebrook Avenue comprises open ranch fencing for approximately 50m and thereafter hedging. We note that planning permission has been granted for a rural dwelling on the easterly field. The site was affected by the A8 road line shown in the
Plan and would have been reduced by the land take, as confirmed by the objector at the Inquiry. The new road will not now affect the site, following the announcement in August 2009. The objector did not submit a case or any evidence and we cannot therefore take this comment as any indication that the objector wished the site to be amended if it were not affected by the road line. We will therefore consider the site as submitted.

The site does not relate well to the existing built form of the village. It would extend development in a quite narrow peninsular form for a considerable distance along the road (to the boundary with Larne Borough). The area is rural in character and the landform slopes down to the stream, which is a pleasant feature. We consider that this site is not acceptable for inclusion within the settlement limit because its development would extend the village along the road and would not contribute to compact urban form. Development of parts of the site would also be prominent. The site is also too large in relation to the need for further land in the village. We recommend no change to the Plan.

Objection 1925 relates to the access to the Castletown Park development (BNE 02/03 in the Plan) and a small area of vacant land between the road and the new dwellings. Planning permission was granted for the development in 2003 and included the access road running outside the SDL. The residential development and road are now built. The Department indicated that the site should be included in the SDL in these circumstances. We agree with the objectors that this is basically a drafting error and recommend that the site is included in the SDL.

**Recommendation**

We recommend that objection site 1925 is included within the settlement limit of Ballynure.

**Lands at Carrickfergus Road**

(Objection 1436)

The site area has been reduced by a third and it lies between Carrickfergus Road in the village centre and the new link road from the A8 roundabout to the SW of the village. The site is open to views from the new road and has low hedges along most boundaries. The site appears rural and attractive when leaving the village centre on Carrickfergus Road due to the agricultural type buildings to the north of the site and the fact that there are no other buildings to the east apart from a single dwelling.

The site appears somewhat elevated in part, open and prominent in views from the new road. We note the Commissioner’s comments on the site in his report on the NAP Inquiry. However, the Commissioner’s view was not endorsed by the Commission who considered the lands to be elevated and conspicuous. We agree with this latter assessment and notwithstanding any changes in levels and the construction of the new road, we find the site to be unacceptable. The site is at a higher level than the existing development in the village and development would appear prominent from there also. The reduced site would yield approximately 100 dwellings, which is in excess of the numbers required for the village.
We note that Roads Service initial objections to the proposed access were resolved by the construction of the new road and the introduction of a 30 mph speed limit on Carrickfergus Road.

We recommend no change to the Plan.

**Lands at Church Road – also to LLPA Designation BNE 05**
(Objection 1395)

The objection site was reduced to a rectangular area (approximately 0.8 hectares) to the rear of the Rectory. It is defined by hedges on three sides with the SE boundary undefined. It was stated that access would be from Toberdowney Drive to serve a development of 4 dwellings. It was argued that this would be in keeping with the LLPA due to the number and size of the dwellings and extensive landscaping.

The reduced site is largely screened to views from Church Road by the Church, the Rectory (with mature vegetation around) and no. 15. There would obviously be views of the site from Toberdowney Drive once the access was provided. The SDL is logically drawn in this area and follows the backs of the dwellings in Toberdowney Avenue. We consider that the reduced site would constitute an illogical protrusion in the settlement limit. We also consider that the proposal would have an adverse impact on the LLPA. This was acknowledged by the objector in seeking the removal of the site from the LLPA. Even the modest development level proposed would impact on the open character and setting of the Church and Rectory. This part of the LLPA has an open parkland character, which would be disrupted by the proposed development. We recommend no change to the Plan.

**BALLYROBERT**

**Lands north of Ballyrobert**
(Objections 107, 272 and 2114)

Objection site 2114 relates to three fields to the north of the village on both sides of the road. The objectors split the original lands into 3 separate sites corresponding to the three fields. We propose to deal with the two fields to the west of the road first. This will include the lands to the north of 2114 comprising objections 107 and 272.

The two fields are open to views from the road and are at a slightly lower level. Boundaries are generally defined by low hedges with the exception of the northern boundary of site 3. We agree with the Department that the northern SDL is well defined by the Lisnalinchy Burn and associated vegetation. Development on these fields would be quite prominent and open to view. The two sites together would constitute a significant extension of the village northwards. The sites are too large for the needs of the village. Our view is not altered by the presence of a row of older dwellings to the north of the sites. We do not consider that the sites are an infill opportunity in any sense. The offer of additional planting somewhat contradicts the objectors’ infill argument and does not outweigh our concerns with the site. Similar considerations...
would apply to site 2. Site 3 would represent an isolated finger of development that would expand the village in an illogical manner.

Site 107 is a small plot of land next to no. 138 Ballyrobert Road. It is removed from the village by site 2 of objection 2114. As we have found that site to be unacceptable, this site must also be unacceptable as it is removed by some distance from the village. We obviously do not agree that the ribbon of roadside dwellings to the north is part of the village.

Site 272 is an extensive area of land to the north and west of objection 2114. The site is separated from the SDL and only peripherally connected to site 2114. The lands to the west are completely isolated from the village. This site would be too large for the needs of the village and its inclusion would lead to an illogical SDL poorly related to the village. As we have concluded that sites 2 & 3 of 2114 are unacceptable it must also follow that this site is unacceptable for similar reasons.

Site 3 (of objection 2114) is situated on the eastern side of Ballyrobert Road. It is well defined by the Lisnalinchy Burn to the south, the former railway embankment to the east and some older roadside dwellings to the north. The site is clearly visible from the road but benefits from the sense of enclosure formed by the embankment to the rear. However, we consider that the Lisnalinchy Burn is a natural limit to the northern edge of the village and the location and shape of the site would not relate well to the existing village form. Purely for these reasons we agree with the Department’s assessment that the site should remain outwith the SDL.

We cannot consider the objectors’ comments on other objection sites in Ballyrobert, as they did not lodge any counter-objections to those sites. Neither can we consider the small portion of land to the south of field 2 (objection 2114) because thus land was not included in the original objection site.

We recommend no change to the Plan as a result of any of these objections.

**Lands East of Ballyrobert Road**  
*(Objections 878, 2037 & 2043)*

The agents for objection 878 argued that the objection related to all the lands to the rear of the properties on Ballyrobert Road as far as the former railway line. The original objection consists of a letter attaching an earlier letter submitted at Issues Paper stage in 2002 but makes specific reference to “a subsequent request for my land outlined on the map to be included”. The map is appended to the Issues Paper letter, but it is clear that the objection letter only relates to the site identified on the plan. There is a point made in the letter regarding other lands, but it is clear that these 11 acres of land are additional to the site i.e. they are referred to as outside the site. The remainder of the letter is solely concerned with the lands identified on the attached plan. The fact that the Issues Paper letter refers to the possible development (including suggested means of access) of all the lands to the rear of Ballyrobert Road is therefore irrelevant. We agree with the Department that the objection site consists of the lands outlined on the map appended to the objection letter. We shall now consider that site.
Objection 2037 and 878 relate to the site of a partially constructed dwelling to the north of the SDL. The site is partly defined by the Lisnalinchy Burn and by the former railway line embankment to the rear. The embankment has been removed from the site to enable the positioning of the dwelling on this part of the site. Objection 2043 relates to a small portion of the lands to the south. The SDL includes all the lands up to the Lisnalinchy Burn on the other side of Ballyrobert Road. We consider that the construction of the new dwelling and access on objection site 878 means that this should also be the case on this side of the road. Objection 2043 lands are unobtrusive and well-defined by the new dwelling, the existing village and the rail line (with double hedges). We consider that it is a logical site for inclusion in the village and would bring the SDL to a logical and notable existing feature i.e. the former rail line. Access to the site could be gained either via the new dwelling to the north or from a new development under construction within the SDL to the west of the site and so Roads Service comments are not accurate or relevant.

Recommendation

We recommend that the lands identified in objections 2037 and 2043 are included within the settlement limit of Ballyrobert.

Land north of Mossley Road
(Objection 50)

Whilst the plan accompanying the objection outlines all the land in the objector’s ownership, it is clear that it seeks the inclusion within the SDL of a small site adjacent to no. 29 Mossley Road only. The Department’s matrix is therefore inaccurate. Farm dwellings are addressed in regional policy in PPS21. Property rights are not absolute and may be controlled in order to meet the requirements of planning policy.

There are trees along the SDL adjoining the site, although no. 29 is visible. The roadside boundary consists of a low wall and then a hedge. The northern boundary is marked by a hedge and the eastern is undefined. The site is reasonably flat. We consider that the inclusion of this site would represent an illogical protrusion of the SDL, which is quite well defined by mature trees dwellings and the former railway line in this area. The eastern boundary of the site is undefined, which is another factor against its inclusion. We recommend no change to the Plan.

Lands south of Ballyrobert
(Objection 1461)

This objection related to an extensive area of land south of the village. We have addressed issues of transport facilities and infrastructure in our general comments on villages. The site (whether all of the site or the lands coloured red) is far too extensive to warrant inclusion to meet the needs of the village. The portion closest to Mossley Road relates poorly to the settlement. The portion to the west of Ballyrobert Road is prominent and would extend the village close to Kingsmoss. We shall consider one part of the site below under objection 2722. We recommend no change to the Plan as a result of this objection.
**Lands south of Liester Park**  
*(Objection 2722)*

The objection site consists of the field to the south of Liester Park and the dwelling and buildings to the south (no. 29). This building is in use as a restaurant with adjoining car parking, as well as a farm. The boundary with Liester Park is defined by a post and wire fence and domestic fences with a mature hedge to the east. The eastern field boundary is defined by a hedge with some gaps. The roadside boundary consists of a low hedge for a short distance and then a mature hedge and trees. There are some mature trees and conifers around the restaurant and buildings, but it can be clearly seen from the road. There is little separating the field from the buildings. The southern site boundary comprises a hedge and some trees. The site is relatively flat and slopes down gradually to the south.

The inclusion of this site would extend the village southwards along the road and this would not represent rounding off or infill. This would represent sprawl towards the small settlement of Kingsmoss. The offer to reduce the site by the exclusion of the restaurant would not alter this conclusion. There was some debate as to whether the roadside hedge could be retained. It appears that access from Liester Park would be possible, subject to possible requirements for improvements in visibility and the provision of a right turning lane. This access would mean that the existing mature vegetation along the road could be retained. However, the site is open to view on exiting the village and travelling south. Any proposals for conversion of the existing buildings can be assessed under the provisions of regional policy for developments in the countryside. We recommend no change to the Plan.

**Objections Seeking a Site for a New School**  
*(Objections 324 & 2164/3)*

NEELB objected on the basis that a replacement is required for the Thompson Primary School in the village. A new school cannot be accommodated on the existing site because of its restricted size and the onerous parking and servicing requirements of Roads Service, it was claimed. Surrounding land uses prevent the acquisition of additional land. The Ballyrobert Community Association stated that the present school is at a very busy crossroads and should be moved to a new site. The NEELB objection appended a letter identifying a preferred site north of Mossley Road and an alternative site south of The Longshot. Ballyrobert Community Association supported the site at The Longshot, but argued that it was too small to provide the school and the recreational facilities that the community need. We consider that there is insufficient information on several matters such as whether a new school is a firm proposal or the suitability of the existing site for re-development or which new site is actually feasible to make a recommendation for the inclusion of additional lands in the Plan. We agree with the Department that these issues are best assessed as part of the development management process.
Open Space Provision in Ballyrobert
(Objection 2164/6)

Open space and play areas associated with new residential developments are addressed by regional policy in PPS7 and PPS8. Areas of existing open space such as the school playing field are shown for information only and public access thereto is not a matter for the Plan. We note that an area of proposed open space was included to the south end of the village in NAP. There is no provision in this Plan. Newtownabbey Borough Council who are the statutory providers of open space were consulted on the Plan and made no comment on open space in Ballyrobert. We have no information on the suitability of the Ballyrobert Community Association’s suggested site of the land at the crossroads south of The Longshot. We therefore remit this suggestion to the Department for further investigation.

COGRY/KILBRIDE

Lands adjacent to Cogry Hill, North of Cogry Road
(Objection 1636)

The site adjoins the Cogry Hill development and access would be from Cogry Road. The landscape in this area is quite open. The field containing the site slopes up from the road to the NW, it levels off close to the field boundary. There are clear views of the site from Cogry Road at several locations. The field lacks any significant vegetation defining its boundaries. The objection site was reduced by 50% in the statement of case. The NE boundary therefore lacks any definition on the ground. The boundary with Cogry Hill consists of a mixture of fences and hedges to the rear of the dwellings.

The submitted plan includes a small area of land to the north that was not in the original objection site and cannot therefore be considered. No part of the original site was within LLPA Designation CY 04. The (reduced) site would not contribute to compact village form; rather it would extend the Cogry Hill development into the open countryside to the east, notwithstanding the fact that the SDL extends NE and follows the river to the north of the site. The site extends to approximately 3 hectares, which cannot be regarded as small scale rounding off of the SDL. The critical north eastern site boundary is undefined and the promise of landscaping would not address this deficiency in the short to medium term. Development of the site would be quite prominent in views from Cogry Road.

The comments on another objection cannot be taken into consideration because there was no counter-objection submitted for this site. The approach taken to the allocation of land in the previous Area Plan is irrelevant to the consideration of this site as a different approach was taken at that time and the RDS had not been published. There are housing Designations within the SDL that remain undeveloped. There are no objections to those designations and so they will remain in the Plan. The issue of land banking does not arise in the context of the RDS direction of village consolidation. We cannot second guess the landowners’ intentions in this regard either. There was no objection to the identification of the settlement as Cogry/Kilbride. They are not two separate villages and there is no basis for separate allocations for both parts of the village and sites must be considered on their own merits. The offers of social housing, open space
and improved pedestrian linkages do not outweigh our conclusions in relation to the site. No evidence of a social housing need for this settlement was provided. We recommend no change to the Plan.

**Lands south of Cogry Road**  
(Objection 3478)

The site is partly within the SDL: this part was a former mill and now contains a paper shredding business. The part within the SDL has planning permission for a two storey office block and apartment development (including the old mill building). There is a wide access and lane leading to the south and rear of the old mill buildings to dwellings along the river. The old mill is a large building complex. The remainder of the site that is within the SDL contains an informal car parking area. The adjoining field is flat and open to view. The NE boundary of the site is marked by trees and a hedge. The SW boundary comprises a thick hedge and trees that almost totally screen the dwellings on the other side from view.

The objection sought the inclusion of the land within the settlement limit and its allocation for development. Housing was not specified. The Department assessed the site for residential development and concluded that the site should be included for housing to meet the three-year supply flexibility. We consider that the development of the site would represent a significant expansion of the village southwards on land that is open to views from Cogry Road. We consider that the existing limit contains the land in commercial use quite well. The lane is defined by a close boarded fence on its southern side. We therefore disagree with the Department that the lands are suitable for inclusion within the limit and recommend no change to the Plan.

**DOAGH**

**Lands south of Burn Road**  
(Objection 805)

The site is on the SW periphery of the village. There is a row of dwellings to the east with an undeveloped housing designation behind them. The eastern site boundary is defined by a hedge. There is a farm complex to the west with an extensive area of mature trees to the rear and along the western site boundary. The roadside boundary comprises a low hedge and so the site is visible from the road. However, it slopes down from the road to a low hedge marking the rear site boundary. There is an overgrown lane running down the middle of the site. We agree with the objectors that the views from the main road (A57) to the south are too distant to be significant.

The strategic arguments regarding the distribution of housing to the Villages have been addressed in Part 1 of our report and above. The Department considered the site to be suitable for development and that it should be allocated to meet the 3-Year flexibility. The site measures nearly 5 hectares. The Department estimate the yield from the site as 123 dwellings. The objectors stated that the output would be in the range of 80 – 100 dwellings due to constraints. This appears to relate to the exclusion of
development from the extreme western part of the site because it is low-lying and boggy.

It is clear that the development of the site would result in significant expansion of the village westwards to the adjoining farm and trees. The southern boundary aligns with the adjoining designation (DH 04/02). There are two large undeveloped housing designations (that amount to over 10 hectares of land) in the village, which allow for significant expansion of the village. We considered the existing allocation to Doagh to offer adequate housing provision in Part 1 of our report. Therein we also disagreed with the Department’s approach of including a large site merely because it was the only objection site in the village. In these circumstances and in the context of our strategic conclusions on the role of villages we consider that this site is also too large for inclusion and recommend no change to the Plan.

As this is a development plan and no issues had been raised, the submission of concept statements, archaeological, ecological, drainage and highway assessments was unnecessary.

**Land at Kilbride Road**  
(Objection 3115)

This objection sought the inclusion of part of Doagh Business Park within the SDL as a DOS (industrial). It is difficult to be precise about the exact site because of the scale of the map utilised for identification. It appears to include a new building containing business units. This building adjoins a former factory. The use of the site has continued despite its rural location. We consider that the river and road junction provide a logical northern end point for the settlement. The identified site does not even abut the limit or include all of the employment uses or buildings around the site. We therefore consider that the site should remain outwith the SDL. We have concluded that DOS designations are not appropriate in the countryside or where the site is in beneficial use. Both these considerations apply in this case. We recommend no change to the Plan.

**OBJECTIONS TO DESIGNATIONS IN DOAGH**

**Designation DH 03/03 Housing LUPA – Doagh Business Park, 20 Mill Road**  
**Designation DH 07 – Doagh River Corridor LLPA**  
(Objections 2992 & 3721)

The residential development appears to be completed on the site and therefore the key site requirements are now redundant and should be deleted from the Plan. The objections related to the LLPA within the housing Designation. The Department accepted that the development had compromised the LLPA and recommended that the parts of the LLPA within the site away from the immediate banks of the river should be deleted. The Department supplied a plan, which appears to correspond to the plan attached to objection 3721. We agree that the LLPA has been rendered redundant by the development on the site and endorse the Department’s view that it should be removed from the site.
Recommendations

We recommend that the key site requirements for Designation DH 03/03 are deleted from the Plan and that those portions of Designation DH 07 within the site are removed from the LLPA, as generally indicated in objection 3721.

Designation DH 10 – Mill Road 2 LLPA
(Objection 648)

The objection was to the overall LLPA, which covers a derelict property and its grounds known as 10 Mill Road. The building makes little contribution to the village in its current condition. There is a planning approval on the site for a housing development, which may have lapsed. It is very likely that the Department sanctioned the loss of the existing building as part of this approval. There is no protection for this unlisted building on a development site in any event.

The trees along the site frontage have been removed for safety reasons and to provide a footpath. The remaining mature trees are the subject of a TPO. The Landscape Architect’s statement of case states that the significant landscape attributes of the site would be protected as part of the assessment of any application for development. In this context there appears to be no need for an LLPA as well. We do not consider that the LLPA Designation is merited on the site in its current condition and given the protection that exists for trees and the mill race.

Recommendation

We recommend that LLPA Designation DH 10 is deleted from the Plan.

STRAID

Lands at Spring Lane and rear of Main Street
(Objection 786 & 1722)

Site 786 consists of a large flat rectangular field. The field is accessed via Spring Lane, which is a very narrow lane with hedges on both sides. The field is enclosed by trees and hedges apart from the SDL which is located at the rear of the properties on Main Street. Site 1722 is within the field and comprises an area of outdoor storage associated with the agricultural merchant’s premises on Main Street. It is a small area enclosed by chain-link fencing.

The inclusion of this site would not constitute rounding-off of the settlement. It would represent significant expansion of the NE corner of the village, leaving a gap between the site and the SDL along Ballylagan Road. The proposed means of access to the site was not explained. Spring Lane is a very narrow single carriageway that would not be suitable for further development. There is no other apparent access and no information was provided of the objector’s intentions. We therefore consider that the overall site should remain outside the SDL.
Objection 1722 claims that urban footprint of the village does not follow the SDL because the area in storage use has not been included and suggested that this brownfield site would be suitable for infill housing. The Department’s planning history indicates that the site and use has planning permission for the storage of agricultural products granted in 2000. We do not consider that such an open storage use need necessarily be included within the SDL. In this case the site would represent an illogical protrusion in the SDL. It would not be suitable for housing independently of the adjoining agricultural merchant’s business, from where access is gained. We recommend no change to the Plan.

Lands west of Straid – between Calhame Road and Irish Hill Road
(Objections 781, 788 & 791)

These objections by the same objector identified 3 hectares of land to the west of the village. The objections were to the exclusion of parts of the site from the SDL; to Proposal SD 05 which identifies part of the site for the provision of open space, and to the inclusion of parts of the site within LLPA Designation SD 04.

The Plan indicates that Proposal SD 05 Open Space was included following consultation with Newtownabbey Borough Council, because it intends to develop the site as a recreation area within the Plan period. A small portion of the proposed area adjacent to the primary school has been developed by the school for recreational use. There is planning permission for a recreation area granted in 2003: it is unclear if this relates to the smaller developed area or the whole site. We note that the western boundary of the proposal is undefined but this is unimportant in the context of a proposal for open space. We consider that the provision of open space and recreational land is very important. There is a large area of new housing opposite the proposal and an adjoining school. The Council is the statutory provider of such facilities and have indicated that the site is required for this purpose. The objector has provided no evidence to support the objection for us to weigh against the Plan proposal. We consider that the proposed open space should remain in the Plan.

The northern portion of the site rises up from Calhame Road and the roadside boundary is quite open with views available to Straidhill House and Plantation to the south, which are key features of the LLPA. The western boundary of that part of the site is undefined. The southern portion of the site is defined by hedges and rises up from Irish Hill Road. The site must be considered as a whole as the objector did not disaggregate is or submit any evidence. The site is too large for the needs of the village. It is prominent and development would adversely affect the setting of the village. We do not agree that the inclusion of the site could be regarded as rounding off and consider that it would represent major expansion of the village westwards onto more elevated land.

No evidence was presented to explain the basis for the objection to the LLPA. There was no case advanced as to why the site did not merit inclusion in the Designation. On the other hand the Department explained how the site contributed to the setting of the village and views of Straidhill House and Plantation. In this context we cannot support the objections and recommend no change to the Plan.
Lands at Seskin Road (south of Seskin Park)  
(Objection 1937)

The objector confirmed that the objection to the LLPA SD 04 was not being pursued. The LLPA relates to a small portion of the site along the river. The reason given was that this part of the site is in the floodplain and could not be developed. The counter-objection related to the LLPA therefore falls with the objection.

The site adjoins the SDL south of Seskin Park and is a relatively flat field. The southern corner of the field contains a roadside dwelling and curtilage (no. 21) with mature trees around. The remainder of the southern boundary is defined by trees. The roadside boundary is marked by a hedge with several mature trees, particularly around no, 21.

The SDL does extend southwards on the opposite side of the road as far as no. 21. The site includes an existing dwelling and could be considered to expand the settlement to a logical boundary aligned with the existing dwelling. The portion of the site within the LLPA would remain free of development. The estimated yield was 22 dwellings and this appeared to be calculated on the basis of no. 21 remaining, with new development on the rest of the site. The Department considered that the site should be allocated to meet the 3-year supply. It was confirmed that there were no issues related to access for development. We consider that the site is acceptable for development and should be included in the STLR, subject to the necessary concept plan addressing the following matters: no development within the LLPA, the relationship with adjoining existing dwellings and additional planting to the SDL. We do not consider that a maximum number of dwellings need be specified because land within settlement limits should be used efficiently.

Recommendation

We recommend that the site is included within the SDL and designated for housing as part of the STLR subject to the concept plan required by regional policy addressing the following matters:

- no built development within the LLPA,
- the relationship between the development and adjoining existing dwellings, and
- additional planting to the SDL.
SMALL SETTLEMENTS

General Objections to the Settlement Limits of Small Settlements

Elevate made objections to almost every small settlement development limit. We propose to deal with them generically in this section. In Part 1 of our report we recommended that the limits of small settlements are strictly controlled. We cannot therefore agree with the argument that the settlement limits are too restrictive. We consider that the limits allow for sufficient growth in the context of small settlements being at the bottom of the settlement hierarchy. In any case as no specific amendments were suggested to settlement limits then these objections cannot result in any changes to these limits. The designation of LLPAs accords with the Plan Strategy and as development is not precluded within LLPAs then there is no need to extend development limits to compensate for them. Several other objectors referred to various settlement limits and claimed that they did not offer any opportunities for new development. We would question the veracity of this assertion in most cases and even if it were true it would not be a factor that should be taken into account in the consideration of individual objections, given our strategic conclusions on the expansion of small settlements.

BALLYCRAIGY

Lands at Gravelhill Road
(Objection 3436)

Objection 3436 sought the inclusion of a 1.5 hectare site to the north of the settlement limit and its exclusion from the LLPA Designation MNY 41, Ballycraigy. The objector sought consideration of the site in two portions – a 0.6 hectare site to the south of Gravelhill Road and a 0.9 hectare site to the north.

We do not consider that the inclusion of either or both portions of the objection site would constitute rounding off. Rather, either of them would extend development to the north unacceptably breaking across prominent and open countryside. This would also apply to the objector’s proposed reduced limit to the northern field, which it was claimed could provide a row of houses along the Gravelhill Road frontage. The inclusion of the objection site would not represent consolidation or produce a compact development form.

The objection site is set well within the extensive LLPA Designation. NIEA evidence was that the objection site comprises of fields of rough pasture bounded by thick mature native hedgerows, scrub woodland and lines of mature trees. Ground cover on the drier areas is tall grasses and some sedges with substantial stands of rush pasture and a greater density of sedges on the wetter areas. There is evidence of badgers, hares and other wild mammals. The site also supports a good variety of birds, including snipe.

We are persuaded by NIEA evidence that the objection site is of importance for local wildlife and nature conservation, providing habitat, cover and wildlife corridors within an otherwise more intense agricultural landscape. Removal of these lands from the LLPA would seriously impact upon the nature conservation value of the area and would be highly detrimental to the integrity of the designation. Exclusion from the LLPA would
also leave an illogical gap in this extensive designation. We are satisfied that the site should remain part of the LLPA and the designation is confirmed. We recommend no change to the Plan as a result of the objection.

Lands to the north of Ballyvesey Road.
(Objections 883/890)

These objections are to the inclusion of the objection site within LLPA designation MNY 41. This extensive LLPA covers the entirety of this small settlement and stretches from the M2 to the south and as far as the Ballyclare Road to the north. Designation as a LLPA does not preclude development but rather ensures that any development which may take place is conducted with sensitivity towards the features for which it was designated. We note that the objection site has been redeveloped for 5 houses which we consider to be sensitive to the LLPA. Removal of the objection site from the LLPA would leave an illogical gap in this extensive LLPA designation. In the absence of any evidence or reasoning justifying its deletion we recommend that the LLPA is confirmed. We recommend no change to the Plan.

BRUSLEE

Lands at Lisglass Road
(Objection 3109)

Objection 3109 sought the inclusion of a reduced objection site (from 18.5 hectares to 1.95 hectares) to the south east of the settlement limit. Even the reduced site would almost double the size of the settlement of Bruslee and we consider it to be significantly out of scale with this small settlement. Its inclusion would intrude across open countryside resulting in urban sprawl in a south easterly direction. Its inclusion would neither round off existing development nor consolidate the overall development form.

The objector argued that the RDS directs housing growth towards Ballyclare which cannot be delivered until the Relief Road is completed which will take approx 5/6 years. Construction of the relief road will not commence until after adoption of the Plan and no housing will be delivered in Ballyclare until the plan has expired. It was argued therefore that small settlements should compensate for the delay in the delivery. Irrespective of any perceived delays in delivery of housing to Ballyclare, we do not accept that deficiencies should be compensated for at the lowest level of the settlement tier. Arguments regarding any over reliance on expansion of Ballyclare and that rural expansion should be more evenly dispersed to provide for the regeneration of traditional communities were dealt with in Part 1 of this report.

The objector also argued that Plan Amendment no 1 – map 43 sets out the road protection corridor for the A8 improvements which will have the impact of obliterating all of the buildings on the western side of Bruslee changing its context and that any growth can only be accommodated to the eastern side of the road. Since the Inquiry we now note that the preferred route announcement on August 2009 for the A8 – Belfast to Larne Dual Carriageway shows the road by passing the small settlement of Bruslee and

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Newtownabbey
cutting through objection site 3109. This negates the objector’s argument regarding the road line and expansion of the settlement.

The strategic location of Bruslee was argued in relation to its close proximity to Larne/M2/Ballyclare/Rail Halt and the road infrastructure improvements and sewerage system upgrades. However irrespective of the location of any of the small settlements within the districts these are within the lowest tier of the settlement hierarchy with minimal growth allocated. In the absence of any strategic argument that Bruslee’s position in the settlement hierarchy should be enhanced it remains in the lowest tier where encroachment into the open countryside is to be avoided. We recommend no change to the Plan as a result of this objection.

Objection 1897 and 1898

These were general objections that the entire town land of Bruslee should be included within the development limits and made reference to no 19 Glen Road falling just outside the limit. We note the Technical Supplement’s justification for the limit is to consolidate the existing built form and prevent further ribbon development along the Belfast Road. We acknowledge that there is a degree of sporadic development around the limit however we would agree with the Department that to draw the limit to include this sporadic development (including no 19 Glen road which is physically divorced from the limit) would be illogical and run contrary to the objectives of consolidation and compact form, further adding to ribbon development. A townland is not a basis for defining a small settlement and to do so would include vast tracts of land which would run contrary to the RDS objectives. We recommend no change to the Plan as a result of these objections.

CRAIGAROGAN

Lands at Bernice Road
(Objection 372)

The inclusion of objection site 372 would extend development significantly along the Bernice Road in a north easterly direction as far as the quarry. We do not agree with the objector that the location of no 8 Bernice Road at the centre of the objection site creates 2 potential infill sites and an opportunity to extend the limit. We consider that the north eastern edge of the settlement limit is logical and clearly defined on the ground with existing curtilages. There is a good physical and visual separation between this edge and no. 8 Bernice Road, which is not read as part of the settlement. Inclusion of all or part of the objection site would create an illogical limit and unacceptable urban sprawl along the Bernice Road in a north easterly direction. We consider that this 2.42 hectare site is large relative to the size of the settlement limit of Craigarogan and would not represent consolidation or rounding off of the settlement form. We recommend no change to the Plan as a result of this objection.

Objection 1671

Objection 1671 sought the inclusion of a significant area of land to the south east of the settlement limit. Its inclusion would almost double the size of the settlement and would...
constitute urban sprawl in a south easterly direction. We are satisfied that the objection site is out of scale with the proposed settlement and its inclusion would be detrimental to the setting of this small settlement. It does not achieve the objectives of consolidation and compactness applicable to the small settlements tier. We recommend no change to the Plan as a result of this objection.

HILLHEAD

Lands at Hillhead Road

Objection 973

We agree with the Department’s concession in relation to the inclusion of the objection lands within the settlement limit comprising of the laneway to properties 126-130 Hillhead Road and the remainder of their rear gardens as this represents a logical rounding off following the curtilages of these properties.

Recommendation

We recommend the inclusion of objection site 973 within the SDL.

Objections 1877 and 1886

Given the Department’s concession to objection lands 973, we consider that it would be logical to include the objection site 1877/1886 to the rear of 120 and 122 Hillhead Road. This small portion of land is bounded by development and constitutes the infilling of a small notch in the settlement limit, achieving a logical and compact SDL.

Recommendation

We recommend inclusion of objection site 1877 within the SDL.

Objection 1218

We agree with the Department that inclusion of this linear roadside objection site would stretch development to the north along the Hillhead Road and would constitute ribboning. The SDL is logically defined along the north eastern boundary by the Hillhead Road and the north eastern boundary of the objection site is undefined on the ground therefore providing no visual containment for development and an illogical boundary. Inclusion of this prominent roadside site would be detrimental to the setting of the settlement when seen travelling along the Hillhead Road.

Objection 1218 also refers to the extent of the LLPA HD008 – Hillhead House – and we agree with the Department that there are no references in any of the LLPA policy definitions limiting the size of the designation.
The objection site is a part of the larger LLPA HD008 – Hillhead House, which includes the setting of the House and extends down to the roadside to include the fields fronting Hillhead Road with historic stone walls and hedgerow enclosures. This linear roadside objection site lies within this setting and we agree with the Department that development within the objection site would have a detrimental impact on the setting and views of this locally significant building and would adversely impact on the character of the LLPA and its setting.

We consider that the lands should remain within the LLPA HD 08 as they contribute to the intrinsic environmental value and character of the area and protect the visual amenity and local landscape setting of the settlement. We recommend no change to the Plan as a result of this objection.

**Objection 3524 and 3509**

Both objections 3524 and 3509 seek the inclusion of very large sites to the north west of the settlement. Inclusion of either of the objection sites would effectively swamp the settlement and would create significant and unacceptable urban sprawl to the northwest. We are satisfied that either of these sites is significantly out of scale with the proposed settlement limit and would be detrimental to the setting of Hillhead. We recommend no change to the Plan as a result of these objections.

**Objection 3190**

The objector sought inclusion of a 1.3 hectare site to the western side of the southern node of the settlement. The lands are to the rear of a road frontage dwelling and contain a number of farm outbuildings, sheds, hard surfaced yards, greenhouses, ponds and tanks. It was claimed that the proposed limit does not follow existing topographical features and that it divides the land use into two separate parts with the result that a substantial portion of their property is excluded from the development limit. It was claimed that it would be logical to include all of the objector’s property which would recognise the extent of the existing and approved development. The objector stated that approvals had been granted for the expansion of the operations including livestock sheds, barns, a fish farm, mushroom tunnels, packing sheds, garages and yards.

Most of the SDL abutting the objection site is defined by the immediate curtilage of existing road frontage buildings, although a small part seems to cut arbitrarily though a yard area. Although the eastern boundary is adjacent to the limit, inclusion of the objection site would extend the development limit significantly to the west and would result in an illogical form. It would not achieve the objectives of consolidation or keep the settlement compact.

We do not consider the existing uses on the site justify the inclusion of this relatively large site within the SDL. It is not unusual to find such uses within the rural area. We do not agree that its exclusion from the development limit would prejudice the running of the business which appears to have been operating for some time. The current uses on the site, if established or approved can continue. We recommend no change to the Plan as a result of this element of the objection.
Part of LLPA, HD 03 South East of Hillhead, lies within the objector’s lands. One of its features contributing to the environmental quality of this area is the Ballylinney River Corridor and associated vegetation. The presence of the LLPA does not impact on the existing use rights and we do not consider it necessary to add the wording, ‘that it does not seek to infringe the objectors established rights’.

The objector sought that the LLPA designation along the Ballylinney River corridor should be extended as far as the stone bridge on the Ballylinney Road and beyond for a distance to protect the Ballylinney Road Bridge and its setting. The Department conceded that the Ballylinney Burn river corridor and old bridge meet the criteria for inclusion within the LLPA in terms of landscape and visual merit, nature conservation and historic interest. We concur with the Department’s analysis and recommend accordingly.

**Recommendation**

We recommend that the LLPA - Designation HD 03 is extended along the Ballylinney River corridor to include the stone bridge at Ballylinney Road.

**Lands at Logwood Road**

**Objection 2515**

Objection 2515 sought the inclusion of a large site to the south east of the settlement. Development of the objection site would break into open countryside and extend development to the east along Logwood Road causing urban sprawl. Such development would not achieve the objectives of consolidation or keep the settlement compact. The presence of a stable block/ garage on the site would be fairly typical of the rural area and does not justify inclusion of the objection site within the settlement limit. This objection site is large relative to the size of the settlement which would result in development out of scale with this small settlement. Accordingly, we recommend no change to the Plan as a result of this objection.

**Objection 3304**

Objection 3304 sought the inclusion of an open field adjacent to the garden centre for residential use. The objection lands are isolated and detached from the SDL by some distance. It would be illogical to include them. Whether or not the objection site is a natural extension to the garden centre, as claimed by the objector, does not justify its inclusion within the settlement limit. We recommend no change to the Plan.

**KINGSMOSS**

**Lands at Kingsmoss Road**

(Objection 879)

This objection sought the inclusion of land to the rear of no 68 Kingsmoss Road within the SDL, and its exclusion from SLNCI Designation KS 02 - Dismantled Railway at...
Kingsbog Crossing. We note that the site of no 68 has been redeveloped with 2 large detached houses and foundations are in place for a third. The rear curtilages of these houses define the settlement limit.

There is a large open undeveloped field to the south west of the objection site which has been included within the settlement limit. We consider that in the context of Kingsmoss inclusion of the objection site does not represent small scale rounding off. The proposed SDL is clearly and logically defined. In visual terms the objection site relates with the open countryside to the south rather than the settlement to the north. We consider that there is an adequate supply of undeveloped land within this small settlement limit for development taking into consideration its position within the lowest tier of the settlement hierarchy.

The portion of the SLNCI objected to is part of a larger linear designation. The objector has not specified why this portion of land should be removed from the SLNCI, and in the absence of any evidence justifying its deletion we recommend that the SLNCI Designation KS 02 is confirmed. We recommend no change to the Plan as a result of this objection.

LOWTOWN

Lands at Lowtown Road
(Objection 1905)

This objection relates to a very large site to the western side of Lowtown. We are satisfied that inclusion of this objection site would result in development significantly out of scale with this small settlement. The curtilages of existing properties along the Lowtown Road provide a strong edge to the settlement. We consider that development on this scale would be at variance with the existing character of the settlement and would represent an unwarranted intrusion into the open countryside. Such development would neither consolidate the existing settlement form nor keep it compact. We recommend no change to the Plan as a result of this objection.

MILLBANK

Lands at Millbank Road

Objections 212 and 214

We agree with the Department’s concession that in light of the planning approval on objection site 212, it should be included within the settlement limit and we recommend accordingly.

Objection site 214 embraces site 212 and given our recommendations for objection site 212 the remaining portion of 214 is a strip of land to the rear of no 28 and 30 Millbank Road and 19 Millbank Road East. When viewed from Millbank East Road this backland site slopes down to the river and any development on it would clearly break into open Newtownabbey
countryside in a south easterly direction. In view of our recommendations in relation to objection site 212, the amended south eastern edge of the settlement limit would now follow logical and well defined boundaries. It also would mirror the eastern boundary of the SDL on the opposite side of the river. We consider that the inclusion of the objection lands outside 212 would represent an unnecessary extension of the settlement into the open countryside contrary to the Plan objectives to promote compact urban forms and consolidation. We recommend no change to the Plan in respect of the residual portion of objection 214.

**Recommendation**

We recommend the inclusion of objection site 212 within the SDL

**Objection 1504**

We agree with the Department’s concession that objection site 1504 should be brought within the development limits and we recommend accordingly.

**Recommendation**

We recommend the inclusion of objection site 1504 within the SDL.

**Objection 1756**

The inclusion of objection site 1756 would extend development significantly to the east, beyond the logical and well defined eastern limit and into the open countryside. We also consider this site to be out of scale relative to the size of the settlement and its inclusion would run contrary to the objectives of consolidation and compact settlement form. We recommend no change to the Plan as a result of this objection.

**Land at Antrim Road**

(Objection 454)

Inclusion of objection site 454 within the settlement development limit would extend development into the open countryside in a westerly direction which would be highly visible from the Antrim Road. Notwithstanding the high density development adjacent to the objection site we consider the site to be out of scale relative to the size of the settlement and we do not agree with the objector that its inclusion would constitute rounding off. We recommend no change to the Plan as a result of this objection.
ROUGHFORT

Lands at Lylehill Road East and Old Coach Road

Objection 3633 and 3329

Objection site 3633 in its modified form presented to the Inquiry, envisages the development of a 40 hectare site for 400 dwellings, a village green, car parking, a convenience store, community facilities, doctors surgery, play areas and a cycle and foot path system. Access would be taken from Lylehill Road East and Old Coach Road.

The objection site lies to the south western side of the settlement limit and extends to the west along Old Coach Road and to either side of Lylehill Road East.

The objectors argued that the proposal is a carefully planned extension of Roughfort and meets the RDS criteria for Expanded Settlements (pg 123). In Part 1 of this report, it was concluded that there is no justification for the major expansion of small settlements or any new settlements to meet the HGI. Any increased growth can and should be met in the higher tiers of the settlement hierarchy. In Part 1 of this report specific reference is made to Roughfort, were it was concluded that its large scale expansion was not warranted.

We now turn to the analysis of the specific objection sites. The Countryside Assessment states that Roughfort consists of 2 nodes and the settlement limit has been drawn to prevent coalescence of the nodes and prevent further ribbon development along the roads leading to the settlement. Although the proposal would not cause the coalescence of the 2 nodes it proposes significant expansion to the south west, expanding the settlement by a factor of 5 or 6 which would constitute excessive urban sprawl involving the loss of significant tracts of open countryside. Although proposals include woodland planting to the proposed boundaries in an attempt to aid the visual merging of the rural/urban interface from the public roads, this large scale sprawling proposal would read as an incongruous urban intrusion on the rural landscape. We disagree that this large objection site would contribute to the enhancement of the current urban form and provide a heart to the settlement as claimed by the objectors. We are satisfied that when viewed from both the Old Coach Road and Lylehill Road and from the surrounding road network, the proposed settlement limit would have a seriously detrimental effect on the visual integrity of the area and the setting of this small settlement.

Planning gain arguments presented by the objectors such as the utilisation of spare capacity in the immediate infrastructure (natural gas, roads, sewerage and drainage), the increase in enrolment figures for local primary schools, proposals for social housing and the invigoration of the existing community and services do not override our conclusions regarding the strategic expansion of this small settlement.

General objections were made to RT02 : Ballymartin Water below Roughfort Bridge SLNCl, and RT 03 : Roughfort LLPA. Whilst the objector did not expand on these objections we are persuaded by the Department that the SLNCl designation includes a rich mosaic of species and wet grasslands and the area provides an important refuge.
for wildlife. The LLPA contains a number of archaeological sites and their settings, most notably a Motte located to the south of Roughfort Road consisting of a scheduled monument known as Rough Fort and associated trees, a Chambered Grave – the site of a medieval church known as Carn Greine, and locally significant buildings and trees of which their associated views and settings contribute to the character and setting of the settlement of Roughfort. Accordingly, we are satisfied that the LLPA and SLNCI designations should remain unchanged.

Objection site 3329 forms part of site 3633. It is a 5.45 hectare site to the western side of the development limit lying between Lylehill Road East and Old Coach Road. Similar arguments were advanced by the objector as those made for objection site 3633 and are covered in the previous paragraphs. We consider that inclusion of this 5.45 hectare site would be significantly out of scale as it would double the size of the settlement. Notwithstanding the presence of strong boundaries its inclusion would result in extensive urban sprawl to the west across open countryside. It neither constitutes infilling nor rounding off and would run contrary to the objectives of consolidation and achieving compact urban form. We are satisfied that access issues are not insurmountable and could be resolved through the development management process. We recommend no change to the Plan as a result of these objections.

Objection 96

This objection sought the inclusion of a 1.8 hectare site within the development limit. We note that the Countryside Assessment justification of the settlement limit designation is to prevent coalescence of the nodes and to prevent ribbon development along the roads leading to the settlement. The objection site is located to the rear of properties along Old Coach Road and to the rear and north of properties along Lylehill Road East. We agree with the objectors that including this backland objection site within the settlement limit would result in the rounding off of the settlement without adding to the threat of ribbon development or causing any coalescence of the nodes. Due to the backland nature of the objection site and the substantial existing boundary to the west, the site is well contained and does not break out into the open countryside.

Our strategic conclusions were that there would be minimal growth to the small settlements which are at the lowest tier of the settlement hierarchy. Although well contained, we consider that this 1.8 hectare objection site is still of a large scale relative to the overall size of the settlement and goes beyond small scale rounding off or infill and therefore we cannot endorse the inclusion of this site for this reason. Accordingly, we recommend no change to the Plan.

Objection 3505

Objection 3505 sought the inclusion of an extensive 19 hectare site to the north west of the settlement and Old Coach Road. This site is significantly out of scale with the settlement and would cause considerable urban sprawl across open countryside to the north west breaking out beyond the well defined limit of Old Coach Road. Its inclusion would be contrary to the RDS objectives of consolidation and compact form. We recommend no change to the Plan as a result of this objection.
Lands at Roughfort Road  
(Objection 1102)

Objection 1102 sought the inclusion of no. 47 Roughfort Road within the settlement limit. We would agree with the objector that the eastern edge of the settlement limit does not follow any defined line on the ground and seems to cut through the front and side garden of no 47. It would be logical to include no 47 and its curtilage within the settlement limit which would provide a well defined hedge line to the eastern edge of the settlement. Accordingly, we recommend its inclusion within the SDL.

Recommendation

We recommend that objection site 1102 is included within the SDL.

TILDARG

Lands at Tildarg Road South  
(Objection 2909)

Objection 2909 sought the inclusion of a large open site to the east of Tildarg Road South. We consider this site to be out of scale relative to the size of the settlement as its inclusion would almost double its size. We do not agree with the objector that Tildarg is a nodal settlement; rather we consider it to be linear stretching along the Tildarg Road to its junction with the Tildarg Road South, including an undeveloped site west of the Hall. We do not agree with the objector that the objection site is less visible than the undeveloped site to the west. Nor do we accept the assertions that the objection site is positioned sensitively with a group of buildings. Notwithstanding that such linear settlements are not the traditional settlement pattern; this does not justify the inclusion of this large, open and highly visible objection site. We recommend no change to the Plan as a result of this objection.
NEWTOWNABBEY COUNTRYSIDE

Objection to the lack of provision for community facilities in the Knockagh area
(Objection 924/1)

This objection stated that there was no land designated for community use along the Old Carrick Road or surrounding area. Whilst no map was provided, the objector referred to land at the junction of Knockagh Road and Old Carrick Road with an approximate size of 4–5 acres. The land comprises grassed, agricultural fields that slope upwards from Old Carrick Road to the north. The boundaries of the fields in the area are defined by mature hedgerows. There are several one-off dwellings of varying age and design in the area, as well as a kitchen manufacturing business some distance to the west of the road junction. Several large housing developments lie immediately south of the Old Carrick Road. The land lies outside the settlement development limit of Metropolitan Newtownabbey.

Whilst the objector states that a proposal for community facilities at this location would meet with Council approval, no proposals or confirmation of Council support for such facilities has been provided. We note the counter-objection in respect of this objection. Development of the land would result in urban sprawl and mar the distinction between settlement and countryside that is clearly defined by the line of the Old Carrick Road. Even if no additional infrastructure were required, we are not persuaded of the need for or suitability of the site for the provision of community facilities. We recommend no change to the Plan.

Land at Carntall Road
(Objection 3479)

The objection relates to a large parcel of agricultural land, which straddles both the Carntall and Reahill Roads. The lands rise markedly towards the north and east and contain several roadside buildings. The objection sought identification of the site as a DOS (unspecified use); inclusion within the SDL was not referred to. No reasoning was provided in support of the objection.

Our conclusions on the zoning of DOSs are contained in Part 1 of our report. The site is physically separated from the proposed settlement limit and other objection sites where inclusion within the urban area is sought. It would be inappropriate to apply a DOS zoning to this site in the open countryside as it would serve no purpose in terms of urban regeneration. We recommend no change to the Plan as a result of this objection.
NATURAL ENVIRONMENT

OBJECTIONS RELATING TO SLNCIS

Designation NY 02/05 – Breckinhill and Drumdarragh SLNCI
(Objection 1747)

The objectors refer to plans for a wind farm within this SLNCI (also an AOCMD) and request that the designation should not prohibit or prevent development of the wind farm. The Plan was advertised and comments were invited in accordance with statutory procedures. The landowners have therefore had the opportunity to make their views known and challenge the designation. As there is no objection to the SLNCI and we have set out our conclusions on Policy ENV 2 and AOCMD in Part 1 of our Report, we recommend no change to the Plan.

Objection Suggesting a Possible Additional SLNCI at Ballyrobert Bog
(Objection 1856/12)

The RSPB suggested that Ballyrobert Bog may qualify as a bog or wet grassland SLNCI because it supported 4 or 5 pairs of Lapwing, Curlew and Snipe in the 1986/7 breeding wader survey. No information as to the location or extent of the site was supplied other than a 6-figure grid reference. The significance of the small numbers of breeding pairs was not explained either. We therefore have insufficient information to persuade us that a SLNCI designation is justified.

COAST

Land at Shore Road - objection to extent of COU3 BMA Coastal Area

Objection 1746 (also to proposed SLNCI - MNY 39/09, ATC - MNY 32, and AOCMD)

This objection related to No. 401 Shore Road. The objection challenged the inclusion of all of the property within the BMA Coastal Area and argued that the boundary of the designation should not extend beyond the high water mark. We note that the designation generally includes land on the seaward side of the Shore Road and incorporates all of this property, which extends down to the edge of the coastal pedestrian/cycle path. An area of grass with ponds lies adjacent to the public pathway outside a 2-metre high wall, which encloses the rest of the property. To the west of the wall there is a steep escarpment with mature trees, before the site levels off. We consider that the area of the property outside the wall containing the ponds forms an integral part of the shoreline and is of significant landscape and environmental importance. Though the wooded escarpment is above the high water mark, it provides a backdrop, which forms part of the coastal landscape at this location. We are therefore not persuaded that these parts of the property should be excluded from the boundary of the BMA Coastal Area. However, we fail to comprehend the rationale for the inclusion of the rest of the property beyond the escarpment, which bears no relationship to the setting of the Coastal Area. We also note that the adjacent properties on Lismara Court...
are not included within the designation. It seems logical that the top of the wooded escarpment would be a more appropriate boundary for the designation. We recommend accordingly.

The objector also argued that the designation of part of the property at No. 401 as a SLNCl (MNY 39/09 – Willowbrook) and AOCMD is unnecessary given the present nature designations along the coastline of the site and the existing TPOs on the site. We note that the boundaries of the other designations, namely the Belfast Lough Ramsar, SAC, SPA and ASSI are demarcated by the pedestrian/cycle path, and that the property at No 401 falls outwith these designations. Willowbrook SLNCl is identified in the Technical Supplement 11: Countryside Assessment which accompanied BMAP as being a woodland/wetland with the defined interest being an area of wetland dominated by willow and bordered by broadleaf woodland. While the woodland is protected by a TPO, this does not extend to the other vegetation and features of the SLNCl. Therefore, the inclusion of the wooded escarpment at No 401 Shore Road within the SLNCl is appropriate. Our comments on the designation of AOCMDs are contained in Part 1 of our report. We recommend no change to the Plan in respect of this element of the objection.

The objection submitted that the entire curtilage of No. 401 should be removed from the proposed ATC MNY 32. The property lies centrally within the designation and there are no site-specific objections seeking the deletion of other lands from same. The former Listed Folly on the site has been demolished and a large, flat-roofed single-storey red-brick office building is presently on the site. Though the building has no architectural merit or unique period style, it is set within generous landscaped grounds, which feature a steep escarpment with mature trees and vegetation. Given the central location of the plot and its landscape setting, which is a key feature of the designation, it would be illogical to exclude the entire site. We recommend no change to the Plan in respect of this element of the objection.

**Recommendation**

We recommend that the boundary of the BMA Coastal Area should be reduced to exclude that part of the curtilage of No. 401 Shore Road which lies to the west of the wooded escarpment.

**Objection 3430**

This objection related to the curtilage of No. 451 Shore Road. The objector stated that the plot is plainly a domestic garden, and not part of the coast. It was submitted that it is not logical to extend the coastal policy area into the curtilage of this dwelling.

The areas to the immediate north and south of No.451 are within the proposed BMA coastal area and are not subject to objection; exclusion of the entire curtilage of the property would leave an illogical gap in the designation. No. 451 and the residential properties to either side sit on land that is raised significantly above the level of the beach and coastal path. Visually, by dint of the difference in levels, there is a disjunction between No. 451 and the eastern part of its curtilage. The lower ground extends northwards and southwards, beyond the objection site, into the grounds of other...
properties and was clearly historically part of the coastal platform. It still has a significant spatial relationship with the beach and lough, notwithstanding the substantial wall that now separates them. We consider that inclusion of this area within the designation is warranted. The presence of two shed-type structures on the lower ground, below No. 451 does not alter our conclusion. Whilst there may be merit in excluding No.451 and its immediate surrounds from the designation, subdivision of the site is not before us, and the entire plot must remain within the BMA Coastal Area. The objector may wish to note our conclusions with regard to the tests of policy COU4 as set out in section 10.5 of Part 1 of our report, which may address many of the concerns in respect of the impact of the designation on the property. We recommend no change to the Plan as a result of the objection.
## APPENDIX 1 – PLANS

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APPENDIX 1

MNY 02/26 - Residential Zoning

Proposed Residential Zoning

Proposed Area of Public Amenities Space

PLAN 4:
Objection site 1761 - Carnmoney Hill
PLAN 5: Objection
1372, amended LLPA boundary – University of Ulster, MNY 54

LLPA MNY 54
OBJECTION BMAP/1372-4-3

SUGGESTED AMENDMENT TO LLPA MNY 54 BASED ON PLANNING APPROVAL U/2004/0505/0
PLAN 6: Objections
1689 et al, amended SLNCl boundary – Craighill, Ballyclare, BE 16/01

To be excluded from SLNCl

Belfast Metropolitan Area Plan 2015 - Draft Plan
Map No. 3d - Craig Hill Quarry Good diversity Site of Local Nature Conservation Importance and Area of Constraint on Mineral Developments

Settlement Development Limit
Site of Local Nature Conservation Importance and Area of Constraint on Mineral Developments

Revised boundary for SLNCl