



QUARTERLANDS 3

Reference submission of revised and additional information - Dated 8 Feb 2023 which was not available on the Planning Portal until 6 MARCH 2023

Reference

Planning application ref: LA05/2022/0033/F Lands between 58 and 66 Quarterlands Road, Northeast of 54B-C & 56 Quarterlands Road, North of 7-12 Rural Cottages and Southeast of 4-7 Zenda Park, Drumbeg

Quarterlands Group
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**SUBMISSION OF REVISED AND ADDITIONAL INFORMATION - PLANNING APPLICATION REF: LA05/2022/0033/F
LANDS BETWEEN 58 AND 66 QUARTERLANDS ROAD, NORTHEAST OF 54B-C & 56 QUARTERLANDS ROAD, NORTH
OF 7-12 RURAL COTTAGES AND SOUTHEAST OF 4-7 ZENDA PARK, DRUMBEG**

The above document Dated 8 Feb 2023 was not available on the Portal until 6 MARCH 2023

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Amended Private Street Determination PSD

This PSD (Fig1A) as the Developer indicated in their accompanying Letter is an “amended version” of the document they submitted in Oct 2022

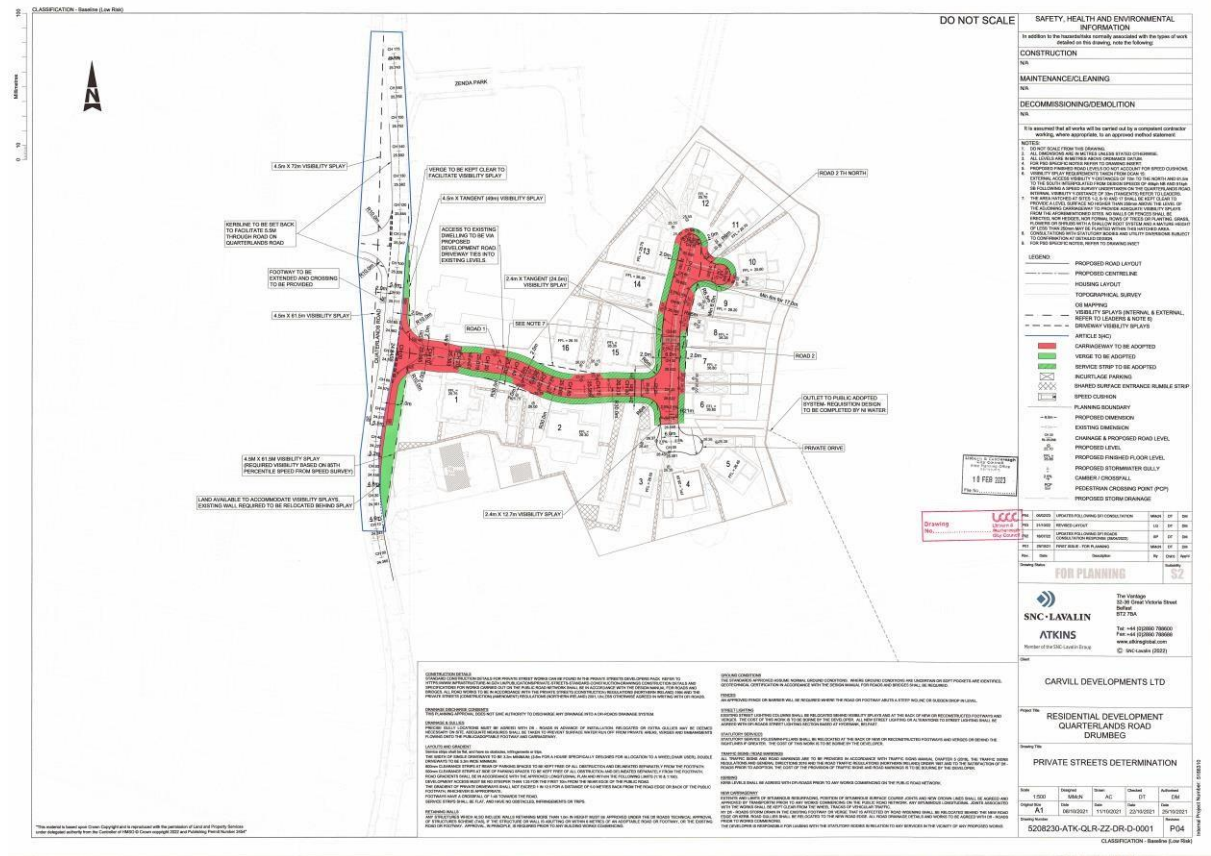


Fig1 A PSD

This PSD (Fig1A) as the Developer indicated in their accompanying Letter is an “amended version” of the document they submitted in Oct 2022

If this new PSD is a stand-alone document, then the previous footpath from the October 2022 PSD on either side of the road has been removed beyond the entrance into the site and applies to the totality of the site. All on-street car parking (14 cars) has also been removed but the in-curtilage car parking spaces for 42 cars remain.

Whilst this new PSD seems to emphasise visual splays both at the entrance and within the site (for Roads purposes) the plantation of bushes etc at the perimeter of the site and the Fencing itself no longer exist.

Also, in Note 7 where they comment on no walls within the site, they refer to Number 17 which I assume is now 66 Quarterlands Road as there is no site 17 on these drawings.

Again, No details have been given for Storm Drainage and Wastewater.

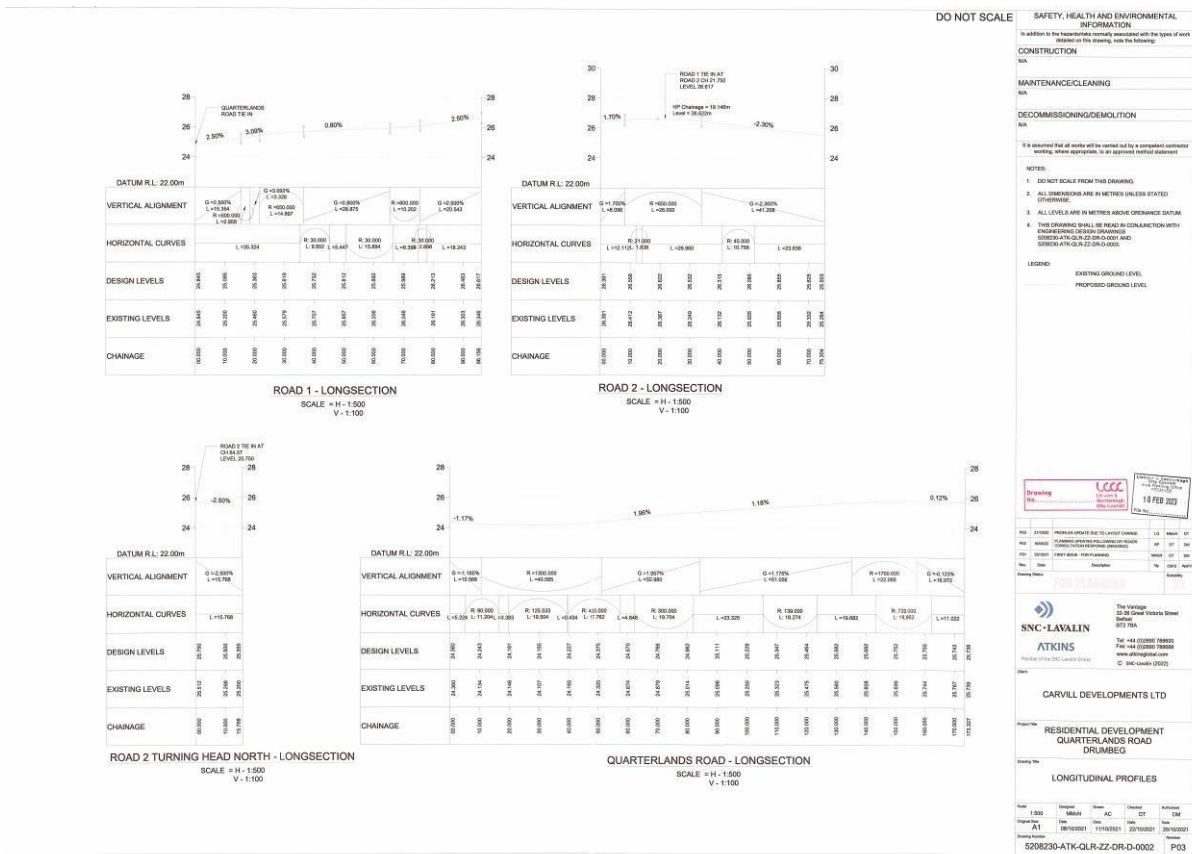


Fig 1B Longitudinal Profiles.

The "A1 Longitudinal profiles" Fig1B unfortunately cannot be read from the data on the document. This is probably because the drawing is designed to be a site drawing printed on A1 size paper, and as such would be readable for the Contractor. However, it is unlikely any revelation in the data as it will simply reflect the various surface levels and depths of the services below and be in accordance with their original proposal.

Removal of On-Street Parking

The removal of the on-street parking is a concerning development. Perhaps the case has been made to include the garage spaces as potential live parking and so meet DfI Roads requirements? Many of the houses have three parking spaces in a line, which would mean the cars parked nearest the houses would require two others to be moved to allow access to the road. This will undoubtedly mean there will be considerable on-street parking because many residents won't be bothered to move their cars all the time. Therefore, if it was DfI Roads that requested the removal of on-street parking because of safety, they would need to explain how noncompliance is going to be policed as it is clearly less safe.

The Eastern Boundary

Looking further at the A1 Private Streets Document (Fig2 below) annotated version the most worrying development is that there is now a gap between House 5 and House 6 and a dotted line for an "outlet to publicly adopted system - requisition design to be completed by NI Water". There is no detail regarding what this 'outlet' is for, but it is probably designated for stormwater. The original Flood Risk Assessment (FRA) stated that *no green field run-off water went in an easterly or southerly direction*. This implied that rather than water leaving the site to the east the existing levels could be such that water entered the site from that direction. Therefore, it is very unlikely that this outlet can reach a convenient open drain to take water away from the site, unless the water is pumped uphill.

This proposal now changes the original FRA document because this outlet is directing water where it hasn't gone before. NI Water need to affirm that this additional water being sent elsewhere carries no flood risk to the South/East properties. The question is why is there a need for this outlet? Why are there no similar outlets shown for storm water leaving the site to the north or west? In such a congested site the most sensible routing for water from that corner would not be to take more land from the residents but rather simply direct the water underground to the storm water sewer serving the majority of the site.

Another question is why NI Water accepted a proposal to direct the storm water from the site to Quarterlands Lane and are now reconsidering that to adopt an additional outlet?

The new 'outlet' goes through what appears to be a wayleave gap between House 5 and House 6. The purpose of a wayleave is to allow a public service provider access to underground services without imposing on private property.

The width of this gap is coincidentally also the normal width of a road, So is this new outlet really an additional storm outlet or simply a means to secure future vehicle access to the field on the eastern boundary?

5. The storm outlet at the rear of the site must only service the 'private drive' of house numbers three to five. This 'private drive' is intended to remain in the control of the developer rather than be adopted, and so they retain control of the potential access road through to the adjacent field mentioned in point 4. Having an independent storm drain for three properties doesn't make any economic sense when there will be a storm drain system right beside the properties.
6. No drainage lines are shown for the storm water coming down Road 1 onto the Quarterlands Road. There is a rider in the notes that says, "This Planning Approval does not give authority to discharge any drainage into a DfI Roads Drainage system". Therefore, if the storm water from the site is neither going into DfI Road gullies nor the NI Water combined sewer – where is it going?
7. Similarly, the storm water that is going down the incline towards Zenda Park has no Storm sewer details shown. Where is this going if not into either a DfI Road gulley or the NI Water system?

From Point4 the wayleave is shown as 6m wide, which is more than ample for two vehicles to pass each other. For a private site road 5m is probably wide enough and have a 1m footpath alongside. The verge at the pedestrian crossing point is shown to extend beyond the corner of house 6 which would be convenient to join a new verge onto. The 6m wayleave is simply included to preserve an access point for future development to the neighbouring field.

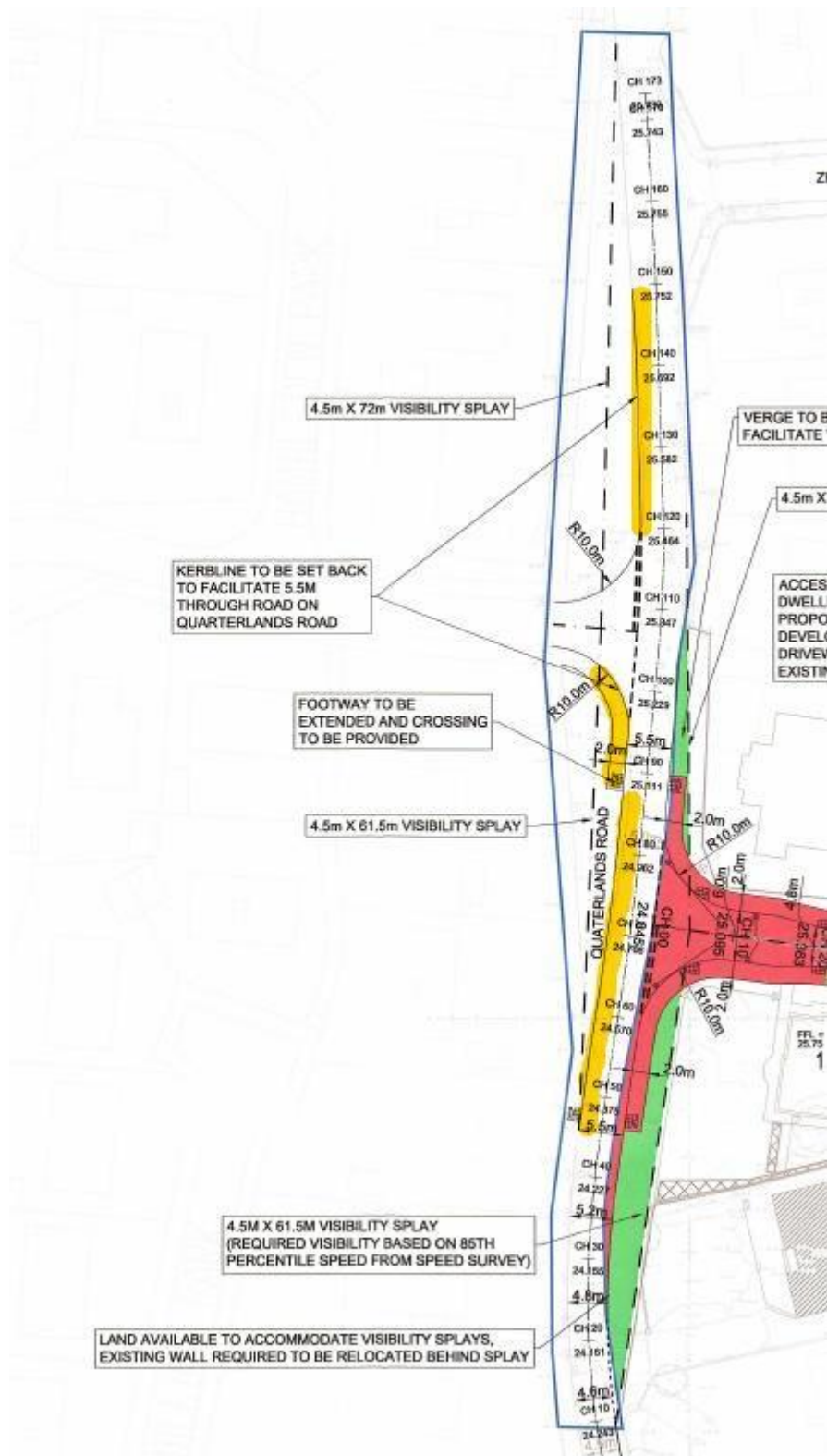


Fig4 Enlarged Map of the junction of Quarterlands Road and the proposed entrance to the site.

Response from DFI

From: "Cash, Stephen" <Stephen.Cash@infrastructure-ni.gov.uk> Subject: RE: Planning Application LA05/2022/0033/F -Quarterlands Road

Fig4 is a 'scanned version of the proposed PSD drawing showing the work on Quarterlands Road associated with the development and in particular where the scheme affects the top and bottom greens at the junction of Hambleton Park/ Quarterlands Road shown (highlighted in yellow). This work consists of removing a slither of both greens to widen the road to 5.5m and the extension of the footway on the bottom green to provide a pedestrian link to the footway at the frontage of the development.

I have asked our Section Office, Lisburn and Castlereagh, who deal with permits for the use of DfI Roads footways/verges by the public to ensure that the developer does not use these greens to store plant or materials.

I have also informed our Private Streets Inspectors, who will oversee the work associated with the Private Streets Determination if the development comes to fruition, that all materials /plant associated with the site shall be stored within the curtilage of the development site.'

Nevertheless, from the Residents viewpoint it is important to emphasise that the removal of a *sliver* usually involves a Digger on the remaining part of the Green which causes damage to the grass which should require immediate repair otherwise it will also start looking muddy from the Digger Tracks.

In addition, one can see that on the South side at the end of the yellow area the road becomes 4.6 M its original width and also at the North end. So, you increase the width of the Road at the entrance and exit from the site to improve the visual splays but there is no comment regarding the increase in volume of the traffic on the 4.6 M Quarterlands Road coming from the Ballyskeagh and Hillhall Roads necessitated by this 16 House development.

Furthermore, the storage of materials and construction plant is to be on site. That is a minor part of the problem. All the vans, cars etc. bringing the workmen to the site and also lorries including Diggers will be occupying the remainder of the already busy Quarterlands and Hambleton Roads particularly any grass verge or remaining footpath will also be occupied. To Police that is an impossible task for Private Streets Inspectors. There is no alternative for them to Park when they are working on the site.

This parking of vans, cars etc for all of the working hours will cause the width of the Quarterlands road for other Residents cars to narrow further. So, at peak times of working hours a bottle neck will be created extending along the Quarterlands Road. This will add a significant hazard to parents leaving off and picking up children at the Pre-School where Quarterlands entrance joins the Ballyskeagh Road. Also, Quarterlands Road is used frequently by Farmers with large Heavy equipment accessing their fields.

Another important point to stress is that all the Spoil from the building site needs to be removed from the site and not left piling up in heaps causing landscape disfigurement and further Drainage problems from that site with water entering the surrounding gardens of Zenda Park (as is happening presently) and Rural Cottages. Also building should not take place on Heaps of Spoil.

Response from DAERA

Planning Application LA05/2022/0033/F - Quarterlands Road Planning Response team on behalf DAERA. 06/01/23

Advice Provided by :

Summary

Natural Environment Division	The development has the potential to harm NI Priority Habitats; and related NI priority/protected species, and further ecological information is required.
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Natural Heritage

Section Reference: CB31328-2

Planning Application number: LA05/2022/0033/F

Summary

Please note that this proposal is subject to the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) (known as the Habitats Regulations).

NIEA, Natural Environment Division (NED) has concerns with this proposal and considers that, in the absence of further information, the proposal would be contrary to the Habitats Regulations and/or Planning Policy Statement 2: Natural Heritage and the Strategic Planning Policy Statement for Northern Ireland in that: The development has the potential to harm NI Priority Habitats; and related NI priority/protected species, and further ecological information is required.

NED acknowledges receipt of the and Landscape Management Plan (Carvill Development) and Preliminary Ecological Assessment (PEA) by AECOM Environmental (November 2021), received 16/01/2022 by the Planning Authority, and has considered the contents.

Please note that this is a desk-based response.

Explanatory note

Proposed Erection of 17 detached dwellings with associated parking, landscaping, open space, site works and access arrangements from Quarterlands Road | Lands between 58 and 66 Quarterlands Road northeast of 54b-c & 56 Quarterlands Road north of 7-12 Rural Cottages and southeast of 4-7 Zenda Park Drumbeg.

NED notes that the proposed site is not within 2km or hydrologically linked to any statutory designated sites. NED requires further information in relation to potential impacts on biodiversity features.

Natural Heritage

NED notes from orthophotography and that there are 6no. SLNCI's and two parcels of Long-Established Woodland within 1km of the proposed site. NED notes that the site contains boundary hedgerows which are Northern Ireland priority habitat (NIPH), for protected species, badgers, hedgehogs and nesting birds etc. There are no extant watercourses or hydrological links within or close to the site's boundary.

NED notes that significant community concerns and objections have been raised on the potential impacts of the development on local biodiversity, and particularly priority species. NED notes from the PEA (AECOM November 2021) that no significant impacts on priority species were predicted as result of the proposal subject to recommended mitigation measures. However, NED notes that according to the Centre for Environmental Data and Recording (CeDAR), some 30no. species of known conservation status have been recorded at 0.5 km radius beyond sites redline boundary. NED note that the extant vegetation onsite is of high ecological value.

NED notes that habitat loss is proposed to facilitate development and will involve removal of a large section (ca.100m) of hedgerow and also grassland scrub vegetation. Hedgerow is a NI priority habitat and a key consideration on the PPS2 (NH5) NI planning policy. *Potential loss of biodiversity hedgerow features to facilitate development can only be considered if proposed mitigation measures are likely to result in a net gain of biodiversity by compensatory native species planting and alternative habitat creation.* NED notes from the PEA and Landscape Management Plan that some 280m of additional native species perimeter planting has been proposed, and ca.165m of external field boundaries. NED recommends absolute minimal loss of extant hedgerow and vegetation as possible to facilitate development, and retention of maximal extant vegetative biodiversity as possible.

NED welcomes the additional mitigation planting and habitat creation (as per Landscape Management Plan) of native species to compensate for the loss of

hedgerow and vegetation. However, many of the species listed on the LMP are not recommended by DAERA. NED recommends inclusion of as many native hedgerow and trees species as possible listed on current planting guidance. Further guidance on native species conducive to local biodiversity can be found here: [Native Species Planting Guidance | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](https://www.daera-ni.gov.uk/native-species-planting-guidance)

Further Information Required.

1. NED recommends an amended Landscape Management Plan that:
 - retains maximal extant hedgerow and vegetative biodiversity as possible, and,
 - includes as many native species listed on current planting guidance. Further guidance on native species conducive to local biodiversity can be found here: [Native Species Planting Guidance | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](https://www.daera-ni.gov.uk/native-species-planting-guidance).

Fig 5 LANDSCAPE PLAN and LANDSCAPE DESIGN 0033
dated 31/03/2023 placed on the PORTAL 11/04/2023.

(See below)

This is a new proposal of Landscape Plan and Design submitted by the developer 31 March 2023.



Quarterlands for Carvill Developom

01/07/2021
18/10/2021
26/10/2021
03/11/2021
17/03 2023

Issue 1
Issue 2
Issue 3
Issue 4
Issue 5
Plan Ref G

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Quarterlands for Carvill Developments

1	Private gardens and public circulation spaces						
				Type	Stock Size	%	per m 2
	m2						
225	Shrubs, perenials and other planting						
	ref						
1. 3	Choisya ternata	Mexican Orange blossom	E	cg 5 L		5	3
1. 4	Cornus stolonifera Flavirmirea	Dogwood	D	1+1 40-60		4	2
1. 5	Corylopsis sinensis	Chinese winter Hazel	D	1.5 - 1.75m		5	1.5
1. 7	Daphne x transatlantica	Daphne	E	cg 5 L		5	1.5
1. 9	Elaeagnus x ebbingei	Oleaster	E	cg 5 L		2	2
1. 10	Euonymus japonicus Green Rocket	Euonymus	E	cg 1.0 - 1.25m		4	5
1. 11	Fatsia japonica	Japanese aralia	E	cg 10 L		2	2
1. 12	Forsythia x intermedia Lynwood Gold	Forsythia	D	cg 5 L		4	1
1. 14	Ilex aquifolium	Holly	E	cg 3 L		5	3
1. 16	Juniperus squamata Blue Star	Juniper - low growing	E	cg 5 L		3	3
1. 17	Ligustrum Ovalifolium Vicaryi	Privit	E	cg 600-800CM		2	3
1. 18	Mahonia x media Lionel Fortescue	Mahonia	E	cg 10 L		6	2
1. 19	Narcissus Tete a tete	Dwarf daffodil	bulb	10cm circ min		5	20
1. 20	Pacysandra terminalis	Japanese Spurge	E	12 - 14 cm g		8	6
1. 22	Photinia x fraseri Red Robin	Photinia	D	cg 10 L		5	1
1. 23	Pinus mugo	Dwarf mountain pine	E	cg 25 L		4	1
1. 24	Pittosporum tenuifolium 'golf ball'	Pittosporum	E	cg 10 L		4	4
1. 25	Prunus lusitanica	Portugese laurel	E	cg 7.5 L		5	1.5
1. 26	Rhus typhina	Stags Horn Stumach	D	1.75 - 2.0m MS		3	1



Quarterlands for Carvill Developments

2	Structural Planting and hedges			Type	Stock Size	%
Lin m						
722	Hedge					
No						
2. 2	Corylus avellana	Hazel	D	br 100-120	58	
2. 3	Hedera helix	Ivy	E	cg 3L	2	
2. 4	Ilex aquifolium	Holly	E	cg 3 L	10	
2. 5	Prunus spinosa	Blackthorn	D	br 80-100	20	
2. 6	Sambucus nigra	Elder	D	br 80-100	5	
2. 7	Taxus baccata	Yew	E	cg 3L	5	
					100	
m2						
720	Trees & Shrubs, wood edge					
Area						
2. 8	Alnus Glutinosa	Alder	D	br 80-100	8	
2. 9	Betula pendula	Silver birch	D	Std 12 - 14 g	5	
2. 10	Betula pubescens	Downy Birch	D	br 80-100	6	
2. 12	Corylus avellana	Hazel	D	br 80-100	8	
2. 13	Crataegus monogyna	Hawthorn	D	br 100-120	8	
2. 14	Euonymus europaeus	Spindle	D	br 100-120	5	
2. 15	Ilex aquifolium	Holly	E	cg 2 L	8	
2. 16	Mauls sylvestris	Crab Apple	E	br 80-100	5	
2. 17	Prunus avium	Bird Cherry	D	Std 12 - 14 g	12	
2. 18	Quercus petraea	Sessile Oak	D	br 100-120	12	
2. 19	Salix caprea	Goat Willow	D	br 80-100	5	
2. 20	Sambucus nigra	Elder	D	br 80-100	3	
2. 21	Sorbus aucuparia	Rowan	D	std 12 - 14 g	10	
2. 22	Viburnum opulus	Guelder rose	D	br 80-100	5	
					100	
	Garden and public area trees					
Area						
2. 23	Betula pendula	Silver birch		2.0 - 2.5m MS		
2. 24	Corylus avellana	Hazel	D	2.0 - 2.5m MS		
2. 25	Mauls sylvestris	Crab Apple	D	12 - 14cm std		
2. 26	Prunus avium	Bird Cherry	D	16 - 18cm std		
2. 27	Quercus petraea	Sessile Oak	D	18 - 20 cm g		



Quarterlands for Carvill Developments

3		Wildflower mix for wayleave		Sown at		
m2					5 gms/m2	%
340					1kg / 200 sq m.	
		Wildflowers				
No	Latin	Common				
3. 1	Achillea millefolium	Yarrow				0.6
3. 2	Achillea ptarmica	Sneezewort				0.4
3. 3	Agrimonia eupatoria	Agrimony				0.5
3. 4	Ajuga reptans	Bugle				0.6
3. 5	Anthyllis vulneraria	Kidney Vetch				0.5
3. 6	Campanula rotundifolia	Harebell				0.5
3. 7	Cardamine pratensis	Cuckoo flower				0.8
3. 8	Centaurea nigra	Knapweed, Common				1.8
3. 9	Daucus carota	Wild carrot				0.7
3. 10	Gallium verum	Lady's bedstraw				0.8
3. 11	Hypericum perforatum	St John's-wort, Common				0.4
3. 12	Hypochaeris radicata	Cats-ear				0.4
3. 13	Knautia arvensis	Field scabious				0.8
3. 14	Lathyrus pratensis	Meadow vetchling				0.6
3. 15	Leontodon autumnalis	Autumn Hawkbit				0.5
3. 16	Leucanthemum vulgare	Daisy, Ox-eye				1
3. 17	Lotus corniculatus	Common birds foot trefoil				0.5
3. 18	Lychnis flos-cuculi	Ragged robin				0.3
3. 19	Pilosella officinarum	Mouse ear hawkbit				0.2
3. 20	Pimpinella saxifraga	Burnet Saxifrage				0.4
3. 21	Plantago lanceolata	Ribwort plantain				0.5
3. 22	Potentilla erecta	Tormentil				0.3
3. 23	Prunella vulgaris	Self-heal				0.4
3. 24	Pulicaria dysenterica	Common Fleabane				0.8
3. 25	Ranunculus acris	Buttercup, Meadow				0.8
3. 26	Rhinanthus minor	Yellow rattle				1
3. 27	Rumex acetosa	Common Sorrel				0.4
3. 28	Rumex acetosella	Sheeps sorrel				0.5
3. 29	Stellaria graminea	Lesser stitchwort				0.2
3. 30	Succisa pratensis	Devils bit scabious				0.8
3. 31	Trifolium pratense	Red clover				1
3. 32	Veronica chamaedrys	Germander speedwell				0.4
3. 33	Vicia cracca	Vetch, Tufted				0.6
						20
		Grasses				
3. 34	Agrostis capillaris	Bent, Common				5
3. 35	Alopecurus pratensis	Meadow foxtail				5
3. 36	Anthoxanthum odoratum	Sweet Vernal Grass				5
3. 37	Festuca ovina	Sheeps fescue				10
3. 38	Festuca Rubra	Red Fescue				25
3. 39	Holcus lanatus	Yorkshire Fog				5
3. 40	Poa parentis	Smooth Stalked Meadow Grass				10
3. 41	Poa trivialis	Rough Stalked Meadow Grass				15
						80

Bespoke seed mix
80 grass/ 20 Wildflower



Quarterlands for Carvill Developments

6	Lawn mix					
				Type	Rate	Per
		Lawn turf / Lawn Seed mix				
				Seed	30	gms/m2
6. 1	Chewings Fescue	General / All purpose seed mix Such as: Boston Seeds Eco-Clover (with Rye grass) mix				
6. 2	Micro clover					
6. 3	Perennial Ryegrass					
6. 4	Strong Creeping Red fescue					



Quarterlands for Carvill Developments

Service Zone and visibility splays							
m2			Type	Native?	Stock Size	%	per m2
7 410	Low growing and ground cover plants						
ref							
7. 1	Convallaria majalis	Lily of the Valley	P	Y	1L containerised	10	8
7. 2	Geranium 'Brookside'	Geranium	Part EP	N	3Lcg	20	6
7. 3	Heuchera 'Rex Lime'	Coral bells	Part EP	N	3L cg	10	6
7. 4	Narcisus 'Tete a tete'	Dwarf daffodil	bulb	N	10cm circ min	30	20
7. 5	Pacysandra terminalis	Japanese Spurge	E	Y	12 - 14 cm g	30	12
7. 6	Vinca minor 'Atropurpurea'	Periwinkle	EP	N	2L cg	30	8
						130	

* = allowing for interplanting

* note, area exceeds 100% as the bulbs are interplanted

c = contained, ie field grown and containerised a season prior to sale

cg = container grown from seedling or container grown for more than 1 season.

Q3 IMPORTANT POINTS

RE: PLANNING APPLICATION LA05/2022/0033/F

As of March 25, 2023

- 1) There have been at least 3 new drawings of the original plans for the site since January 2023. These most recent drawings show significant changes which are not written anywhere they include
 - a) The planting scheme which was to have been the wildlife corridor to replace the Hawthorn hedge habitat being destroyed is gone.
 - b) The proposed planted boundaries have been replaced with cheap fencing post and wire in places.
 - c) On street parking bays and footpaths have been removed from the most recent drawings meaning driveways become parking for three cars showing them overhanging. These spaces numbering 42 from a previous provision of over 60, make walking dangerous for pedestrians, children, disabled, mothers with prams etc as they have to step into more of the road to walk round the rear end of cars.
 - d) Substantially wider area has been left unexplained between houses 5 and 6 of the development plan, looks like provision for a road to the field beyond.
 - e) See attached drawing. [20230215 a1 private street with text]
 - i. NOTE The storm outlet at the rear of the site must only service the 'private drive' of house numbers three to five. This 'private drive' is intended to remain in the control of the developer rather than be adopted, and so they retain control of the potential access road through to the adjacent field mentioned in point 3 Page 6. Having an independent storm drain for three properties doesn't make any economic sense when there will be a storm drain system right beside the properties.
- 2) Where is the information concerning sewerage in view of the fact that the Drumbeg WwTw is now closed to any more building.
- 3) Significant loss of Hambleton Green, the area at the entrance to Hambleton maintained and used by the community. Altering it will increase the road width for a short stretch, but it narrows substantially again at both ends. Why is this being done?
- 4) According to DAERA the NIEA Natural Environment Division The development has the potential to harm NI Priority Habitats; and related NI priority/protected species. How is this being addressed?
 - a) **NIEA, Natural Environment Division (NED) clearly has concerns with this proposal and considers that, the proposal may be contrary to the Habitats Regulations and/or Planning Policy Statement 2: Natural Heritage and the Strategic Planning Policy Statement for Northern Ireland in that: The development has the potential to harm NI Priority Habitats; and related NI priority/protected species, and further ecological information is required.**
- 5) Natural Heritage NED notes from orthophotography and that there are 6. SLNCI's and two parcels of Long-Established Woodland within 1km of the proposed site. NED notes that the site contains boundary hedgerows which are Northern Ireland priority habitat (NIPH), for protected species, badgers, hedgehogs and nesting birds etc. Is this being addressed by the planners?
- 6) NED notes that according to the Centre for Environmental Data and Recording (CeDAR), some 30no. species of known conservation status have been recorded at 0.5 km radius of the site.
- 7) **NED note that the extant vegetation onsite is of high ecological value.**

- 8) NED notes that habitat loss is proposed to facilitate development and will involve removal of a large section (ca.100m) of hedgerow and also grassland scrub vegetation. Hedgerow is a NI priority habitat and a key consideration on the PPS2 (NH5) NI planning policy.

SUMMARY AND CONCLUSIONS

- New PSD (08 February 2023) No on-street parking, no footpaths within the site with no evidence of Boundary Planting or Fences.
- New gap between Houses 5&6, width 6M with the potential road shown to open up the East side of the site and potential connection to Phase2 Development in the next-door field
- No details for Storm or Wastewater Drainage. In this new gap between House 5 & House 6 there is a dotted line for an “outlet to publicly adopted system - requisition design to be completed by NI Water” (probably Storm water) (Text Page 4). This proposal now changes the original Flood Risk Assessment (FRA) document as this outlet is directing water where it has not gone before (Text Page 4). Confirmation from NI Water is needed that this additional water being sent elsewhere carries no flood risk to South/East properties.

Furthermore, no drainage lines shown for Storm Water coming down Road 1 onto Quarterlands Road (Text page 7). If the Storm water from the site is neither going into Dfl Road gullies nor NI Combined sewer – where is it going?

In addition, Storm water going down the incline towards Zenda Park has no Storm water details shown (Text Page 7). Where is this going if not into either a Dfl road gully or the NI Water system?

Regarding Wastewater Drainage - as WwTw Drumbeg is now closed to new applications where is the information concerning sewerage?

- The potential widening of the Quarterlands Road to 5.5M at the potential site entrance and where Hambleton Park meets the Quarterlands Road: procedurally one expects this to require re-advertising/public consultation. The remainder of the Quarterlands Road remains 4.6M wide North and South.
- A further major problem apart from the storage of heavy equipment on the site will be the parking of workmen’s vehicles on Quarterlands and Hambleton Roads not to mention heavy vehicles delivering Building Materials unto the site. The further narrowing of these already narrowed roads with increase in the volume of traffic will add hazard to not only the residents moving in and out of their homes but also to those delivering and picking up children from the pre-school on Quarterlands Road.
- Summary recommendation from DAERA Natural Environment Division states “ The development has the potential to harm NI Priority Habitats and related NI Priority/ Protected Species and further ecological information is required”
- Furthermore, NIEA Natural Environment Division of Natural Heritage (NED) point out that the > 100 Metre old Hedge on-site is a “ Protected Habitat” They state that NED recommends “ absolute minimal loss of this extant Hedgerow assuming that “ some 280 Metres of additional native species perimeter planting has been proposed and ca.165 M of external field boundaries” However the most recent PSD (Fig1A) does not indicate perimeter planting or fencing.

Nevertheless the > 100M old Hedge bisects the proposed application. To be retained the present House Design needs to be reconfigured along with the on-site new road .In addition NED note that the extant vegetation onsite is of “High Ecological Value” which the Developer plans to remove as grassland scrub vegetation. NED recommends “absolute minimal loss of extant hedgerow and vegetation as possible to facilitate development and retention of maximal extant vegetative biodiversity as possible” To comply with these recommendations the present PSD is no longer operative.

- DAERA also note “As the Planning Authority is the competent authority under The Conservation (Natural Habitats etc.) Regulations 1995(as amended) ,this responsibility extends to the carrying out of Habitat Regulations Assessments(HRA’s) before a Planning decision is made.”

- **Thus, NED recommends an amended Landscape Management Plan that: retains as much maximal extant hedgerow and vegetative biodiversity as possible and includes as many native species listed on current planting guidance .**

- On 31 March 2023 a further Landscape Plan and Planting schedule were proposed by the Developer with no reference to the >100M old Hedgerow which they plan to remove in its entirety and no comment on the minimal scrub loss which is of high ecological value. Thus, the developer has chosen to ignore DAERA’s recommendations.

- We have also a growing concern that the planning portal is not performing correctly. It continues to be a frustrating resource to access with documents badly titled, undated and very time consuming to download. More worryingly we know of further objections being sent in and not appearing on the portal for months if at all and these are letters from personal contacts of our group. Are there more objections which are not being correctly collated either for this development or for others? It serves to make this planning/consultation process difficult and open to abuse.