

Place and Economy Department
Planning and Building Control



(Please quote at all times)

Mr P Duffy
Principal Planning Officer
Local Development Plan Team
Planning Office County Hall
182 Galgorm Road
Ballymena
BT42 1QF

Date: 11 December 2019

Your Ref:

Our Ref: MEA/dPS

Dear Paul,

**MID AND EAST ANTRIM LOCAL DEVELOPMENT PLAN 2030
CONSULTATION ON DRAFT PLAN STRATEGY**

I refer to the recent consultation on your new Local Development Plan Draft Plan Strategy (dPS) and thank you for affording Belfast City Council the opportunity to comment on the documents. I can confirm that the City Council has considered the consultation documents and wishes to make the following comments at this time.

Part 1

Spatial Growth Strategy (5.1) and Settlement Hierarchy (5.2)

The general approach to the proposed growth strategy and settlement hierarchy is considered appropriate, having regard to regional planning policy and the scale and function of settlements. Whilst the overall reduction in the number of small settlements is welcomed, the designation of new small settlements may have longer term sustainability implications, where the growth contributes to unsustainable forms of travel for residents seeking access to services and jobs.

Strategic Housing Allocations and Management of Housing Supply (5.3)

It is noted that the proposed housing allocations are based on the 2012-2025 Housing Growth Indicators (HGI) and DfI have published, 2016 based HGIs since the publication of the Mid and East Antrim draft Plan Strategy (dPS).

The changing percentage allocation of housing between the settlement tiers and countryside is welcomed. In comparison to the proportion of households in each tier at the time of the 2011 census, the increase in allocations to the settlement tiers and percentage point decrease in allocation to the countryside is as a shift towards a more sustainable approach. In addition, the protection of zoned housing land and the sequential/phased approach to the management of housing supply as a means of focusing growth in more sustainable locations. This could be enhanced through the prioritisation of land with good sustainable transport to surrounding employment and service centres.

Transport Strategy (5.7)

The Transport Study Objective 1 “Enhance accessibility and connectivity by road and public transport from our town centres to Belfast and Londonderry as well as gateways and hubs” should emphasise enhancing accessibility by sustainable transport modes and the need to reduce less sustainable forms of travel such as single occupancy cars for commuting purposes.

Policy HOU 5 Affordable Housing in Settlements

The approach to the provision of affordable housing is based on site thresholds and assigned quotas for the upper and bottom tiers of the settlement hierarchy, alongside key site requirements at the Local Policies Plan stage. In the policy recognition of the need to address local challenges and circumstances, it is considered there is broad alignment between the two approaches (i.e. Mid and East Antrim dPS and Belfast dPS) towards helping to achieve unmet need for affordable housing.

Part 2

Transportation (9.1)

In the context of the aspiration to promote more sustainable modes of transport, the preferred new settlement locations appear anomalous alongside the aspiration “to ensure that appropriate consideration is given to transport issues in the allocation of land for future development”.

Policy Aims (9.1.9)

The Council welcomes the strategic approach for Transport as set out under the policy aims:

- To deliver sustainable patterns of development which reduce the need for the private car and promote the use of public transport and active travel modes;
- To facilitate safe and efficient access, movement and parking; and
- To protect land required for new transport schemes and the re-use of disused transport routes.

The Council would strongly support the promotion of sustainable transport links that enhance accessibility across the region.

Policy TR3 New Transport Schemes

The policy to safeguard land required for the implementation of transport schemes is welcomed. This policy has the opportunity to support enhanced accessibility and connectivity Public Transport thereby reducing reliance on less sustainable forms of travel.

Open space, sport and leisure (8.2)

The Council welcomes the approach to open space - Policy OSL1 Protection of Open Space and through Policy OSL7, a flexible approach to future cemetery provision. The potential for provision of cemeteries and crematoria is a cross-boundary issue that Belfast City Council is continuing to explore in relation to the short and longer-term requirement.

Retail

The Council welcome that a ‘town centre first’ approach is to be applied in the assessment of sizable comparison goods proposals for new floorspace and find this in line with the requirements of the SPPS and supports economic development in the three main towns of Ballymena, Carrickfergus and Larne.

Safeguarding our Natural Environment (11.0)

The Council welcomes the approach to the Natural Environment and it is generally consistent with our own approach. Where there are no directly adjoining council boundaries the consideration of broader designations at the next stage of the Plan process.

Technical Supplement 9 Appendix A: Draft Mid and East Antrim Borough Council Local Transport Study

The DfI draft Local Transport Study (LTS) identifies areas for improvement in transport provision and infrastructure and the Council would welcome proposals to enhance sustainable transport links with commuter towns. The range of draft measures presented in the draft LTS are broadly welcomed in their support for regional connectivity proposals to improve Park and Ride and Share on Key Transport corridors, improved 'limited stop' bus services to key hubs and improved integration between public transport modes. As previously mentioned there has been significant investment to upgrade road connectivity in the area and it is considered that the emphasis should be to improve connectivity by sustainable transport modes during the plan period.

The Council would welcome further engagement towards the resolution of the constraints (arising from a combination of infrastructure and operational issues) the rail network serving Ballymena and Carrickfergus / Larne, and connecting into the wider Belfast Metropolitan Transport Plan.

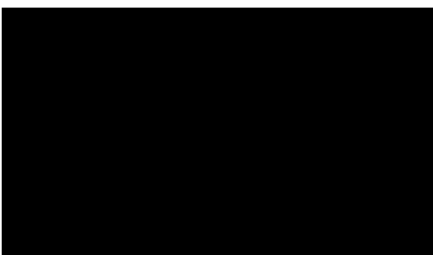
The approach in the LTS Objective 2 summarised as Public Transport Accessibility is generally welcomed where it advocates, alternative Ulsterbus rural operations including integration with 'limited-stop' services: and the provision of higher capacity trains at increased frequency.

The published draft Plan Strategy document and supporting information provides a good basis for our continued joint working as our respective LDPs progress to Local Policies Plan stage. Belfast City Council look forward to working with Mid and East Antrim and DfI to maximise the potential connectivity and shared planning outcomes.

I trust that the above comments are helpful and can usefully be considered alongside the other representations in the ongoing preparation for your draft Plan Strategy.

Should you require any further clarification on these matters, please contact Anne Doherty Development Planning & Policy Team, Belfast Planning Service Tel: 02890 500510 (ext.3477).

Yours Sincerely,



Director of Planning and Building Control