

Data Protection Officer  
Mid and East Antrim Borough Council  
The Braid  
1-29 Bridge Street  
Ballymena  
BT43 5EJ

Section B. Your Details

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

**Please only tick one**

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

**Q2. What is your name?**

Title

First Name **(Required)**

Last Name **(Required)**

Email

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

- ☐ Yes      ☐ No      ☐ Unsure

Section C. Individuals

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

Section D. Organisation

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

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

Organisation / Group Name **(Required)**

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

Organisation / Group Address (if different from above)

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

Section E. Agents

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

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

Client Contact Details

Title

First Name **(Required)**

Last Name **(Required)**

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

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

Please only select one.

- ☐ Agent
- ☐ Client
- ☐ Both

## Section F. Soundness

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

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

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

## Section J. Type of Procedure

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

Please select one item only

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

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

## Section K. Is the draft Plan Strategy Sound?

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

### Sound

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

**(Required)**



## Section L. Unsound

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

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

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

[https://www.planningni.gov.uk/index/news/dfi\\_planning\\_news/news\\_releases\\_2015\\_onwards/development\\_plan\\_practice\\_note\\_06\\_soundness\\_version\\_2\\_may\\_2017.pdf](https://www.planningni.gov.uk/index/news/dfi_planning_news/news_releases_2015_onwards/development_plan_practice_note_06_soundness_version_2_may_2017.pdf)

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

Continued on next page.

## Section M. Tests of Soundness (Required)

### Procedural tests

- ☐ P1. Has the plan been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
- ☐ P2. Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- ☐ P3. Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?
- ☐ P4. Did the Council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?

### Consistency tests

- ☐ C1. Did the Council take account of the Regional Development Strategy?
- ☐ C2. Did the Council take account of its Community Plan?
- ☐ C3. Did the Council take account of policy and guidance issued by the Department?

### Coherence and effectiveness tests

- ☐ CE1. The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans of neighbouring Councils.
- ☐ CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
- ☐ CE3. There are clear mechanisms for implementation and monitoring.
- ☐ CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.

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

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

**Relevant Policy number(s)**

**(and/or)**

**Relevant Paragraph number(s)**

**(and/or)**

**District Proposals Map**

Please give full details of why you consider the draft Plan Strategy to be unsound having regard to the tests(s) you have identified above. Please be as clear and concise as possible.

If you consider the draft Plan Strategy to be unsound, please provide details of what changes(s) you consider necessary to make the draft Plan Strategy sound.

MID AND EAST ANTRIM BOROUGH COUNCIL

## RESPONSE TO DRAFT LOCAL PLAN STRATEGY



SUBJECT: LANDS AT OLD PARK ROAD/CULLYBACKEY ROAD,  
BALLYMENA

December 2019

## EXECUTIVE SUMMARY

1. This representation is submitted in response to the draft MEA Plan Strategy (Dps).
2. The dPS is unsound as the legal compliance tests have not been met.
3. Furthermore, the Sustainability Appraisal (SA) provided in support of the dPS is fundamentally flawed.
4. Taken together, these flaws render the dPS in its entirety unsound as the relevant soundness tests cannot be met.
5. In the absence of further work in respect of the identified flaws, the development plan document should not be permitted to proceed.

## 1.0 INTRODUCTION

- 1.1 This submission responds to the draft MEA Plan Strategy(dPS), published in September 2019.
- 1.2 The response relates to the potential development of a segment of land in north-west Ballymena. It highlights aspects of the Draft Strategy that are **unsound**, in particular regarding the strategic development of Ballymena and its housing and associated infrastructure provision.
- 1.3 The submission is structured as follows:
- the background to the submission is set out in section 2.0;
  - the '*soundness*' requirements for the LDP process are set out at section 3.0;
  - issues with the Plan period are set out in section 4.0;
  - issues with the housing allocation are discussed in section 5.0;
  - transportation considerations are in section 6.0; and
  - conclusions are in section 7.0.
- 1.4 A comprehensive report on transportation considerations, prepared by **Kelvin Clarke of Mott MacDonald and Systra Ltd**, is at **Appendix 1**. A Site Analysis and Concept Plan, prepared by **Here Architects**, is at **Appendix 2**.

## 2.0 RATIONALE FOR SUBMISSION TO PLAN STRATEGY

- 2.1 This submission relates to the potential development of lands in the north western sector of Ballymena. The land runs between Oldpark Road to the west, and Cullybackey Road to the north east.
- 2.2 A site location map is shown below:



**Site Location**

- 2.3 The scale, location, and strategic importance of this parcel of land, coupled with the content, direction and unsoundness of the draft PS have severe adverse implications for the role of Ballymena (a 'main hub' in the RDS) and the sustainable integration of transportation and land use.
- 2.4 The subject land is sustainably located in terms of urban form. It is close to major schools, and it is much closer to the town centre and the railway station than many other parts of the town. The proposed development area extends to about 45 hectares. It includes several areas of fairly dense tree cover, especially to the rear of Ballymena Academy. However it is predominantly gently rolling farmland, interspersed with some hedges and trees. It is bounded by development at Oldpark Road to the west, Galgorm Manor and Ballymena Academy to the south, and the railway line and Cullybackey Road to the north east. It is clearly a distinct physical 'notch' within the existing fabric of the settlement.



**Ballymena Area Plan**



- 2.5 It is envisaged that future development in this area will be residential led, with complementary community facilities such as a local centre. The main strategic element is delivery of a tree lined distributor road, to run from Galgorm Manor through to Cullybackey Road. A road spur can be provided to facilitate a new access to Ballymena Academy. Pedestrian and cycle linkages will be provided throughout, with substantial amenity open spaces.
- 2.6 Given the size and strategic location of the site, there is also scope to include a new business and technology park, which could facilitate start up and high tech businesses.
- 2.7 The principle of securing essential infrastructure through land zonings is well established in Area Plans. Examples of this approach include Blaris/Knockmore in Lisburn, Ballyclare, Londonderry and Newtownards, where land was zoned specifically in Area Plans to stimulate and fund delivery of key elements of infrastructure.
- 2.8 The main advantages of the proposal are:
- **the potential to deliver long planned road infrastructure** to relieve traffic pressures, especially in the Galgorm Road area and around the schools at Ballymena Academy and Cambridge House;
  - **improvement in residential amenity** for people living in Ballymena West and Galgorm through improved connectivity and relief of traffic congestion;
  - **potential to provide a new access to Ballymena Academy** which would improve connectivity to the school and significantly reduce congestion on Galgorm Road;
  - delivery of significant infrastructure to benefit the whole town through substantial private finance contributions;
  - delivery of a planned urban extension, to include **a wide range of house types, including affordable housing and care provision** and appropriate **community facilities** such as a local centre, etc;
  - integration of **major parkland/ecological features**, utilising existing woodland and wetlands;
  - potential to include a **new business/technology park**, with good access to the surrounding area; and
  - networked open spaces with good **cycle and pedestrian permeability**.

2.9 **Illustrative site analysis and conceptual layouts are at Appendix 2.**

- 2.10 Overall, the identification of this area for mixed residential-led development, in association with infrastructure delivery, will not prejudice the overall 'soundness' of the LDP. Indeed it will help to secure important elements of the BAP which it has not been possible to deliver due to the inadequacy of zoned land and failure to require developers to contribute to essential infrastructure.

**3.0 SOUNDNESS.**

- 3.1 All new Local Plans are required to take account of the Regional Development Strategy 2035, the Sustainable Development Strategy for NI, and the Strategic Planning Policy Statement (SPPS).
- 3.2 Section 10(6) of the 2011 Planning (NI) Act 2011 states that Plan Strategies and Local Policies Plans must be submitted to independent examination to determine:
- a) that it satisfies the requirements relating to the preparation of the Development Plan Document; and
  - b) whether it is sound.
- 3.3 In relation to soundness, key tests include: taking account of the RDS; the Community Plan; and policy and guidance from the DFI. The Plan should also be realistic and appropriate, having considered alternatives. Development Plan Practice Note 6 on 'Soundness' summarises the tests as follows:

<u>Procedural tests</u>	
P1	Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?
P2	Has the council prepared its Preferred Options Paper and taken into account any representations made?
P3	Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?
Version 2 / May 2017	
3	

---

Development Plan Practice Note 6	Soundness
P4	Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
<u>Consistency tests</u>	
C1	Did the council take account of the Regional Development Strategy?
C2	Did the council take account of its Community Plan?
C3	Did the council take account of policy and guidance issued by the Department?
C4	Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?
<u>Coherence and effectiveness tests</u>	
CE1	The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;
CE3	There are clear mechanisms for implementation and monitoring; and
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

3.4 The Dps is unsound and in particular **fails the consistency and coherence and effectiveness tests**, in that:

- the Plan period fails to take account of policy and guidance as it is unrealistically short;
- the Housing Allocation is restrictive and unrealistic, especially with regard to recent build rates and allocation to the main hub of Ballymena; and
- the Transportation elements are inadequate and lacking in a robust evidence base.

3.5 The reasons for the failures identified are set out in the following sections.

## 4.0 PLAN PERIOD

4.1 The dps is unsound (**Consistency Test C3**) as the Plan period fails to take account of Development Plan Practice Note 01.

- 4.2 Development Plan Practice Note 01 advises that development plans should provide a 15 year framework for development (extract below):

2.6 The LDP should fulfil the following functions:

- **provide a 15-year plan framework** to support the economic and social needs of a council's district in line with regional strategies and policies, while providing for the delivery of sustainable development;

- 4.3 Significantly, the NPPF in England states that strategic policies should be for a 15 year period following adoption. As a matter of logic the same should apply to the dPS.

22. Strategic policies should look ahead over a minimum 15 year period from adoption<sup>14</sup>, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

23. Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies)<sup>15</sup>.

- 4.4 The Draft Strategy advises that it will provide the policy framework and land use proposals for the Borough **up to 2030**. However the draft Strategy was published in 2019, and the finalisation of the Plan Strategy and Local Policies Plan is likely to take at least another 3-4 years before the Plan will be adopted. Experiences with BMAP, Lisburn, and other development plans has demonstrated that these have consistently taken much longer to produce, and have often been at, or close to, their stated end dates before they become effective as decision making tools. The dPS replicates the same unsustainable approach as previous plan strategies in that the period fails to meet the guidance from the outset.
- 4.5 In contrast, Belfast City Council has adopted the DPPN 01 guidance in its Draft Plan Strategy, which aspires to ambitious growth targets **up to 2035**. However the Mid and East Antrim Plan is now already 4 years into its plan period, and even on the best estimate it will not be adopted until at least 8 years into its plan period. It is simply impossible for it to provide the **15 year framework for growth** which is required from a LDP. This renders the Plan **unsound**, and the approach irrational.

- 4.6 By extending the Plan Strategy to 2035 it may be possible to introduce land use proposals for the Borough which will proactively shape the pattern of development, and thus provide greater certainty for the Council, investors, developers and the public. An extended period would also be more efficient in terms of council, community and private resources.

## SUMMARY:

**The Draft Strategy is unsound as it fails to comply with DPPN 01. The effective plan period will fall well short of the 15 year period which is required to support the economic and social needs of the Borough. The Plan period should be extended to at least 2035 in order to provide an effective development framework for the Borough.**

## 5.0 HOUSING ALLOCATION

- 5.1 The Plan Strategy is unsound as its Housing Allocation is both incoherent and unrealistic (**Tests CE1 and CE2**).

### **Difference between HGIs and Plan Housing Allocations**

- 5.2 The Council must **have regard** to the Housing Growth Indicators (HGIs) published by Department of Infrastructure.
- 5.3 The HGI should not be regarded as, or used as a deliberate 'cap' on building, especially as housing supply in Northern Ireland is currently lagging well behind local needs because of low build rates during the recession years. Plainly, there are other considerations (eg housing tenure and distribution) which must be addressed to ensure that this Plan is sound, even if this results in a housing allocation which is significantly higher than the HGI figure. Indeed Belfast's Draft Plan Strategy places significant emphasis upon achieving housing growth which will significantly exceed the HGI levels.
- 5.4 Significantly, **HGI figures are not the same as a plan allocation, and must not be confused with one**. The HGIs provide only an indication of the number of houses which, in purely statistical terms, should be **built and occupied** by 2030. The comment in paragraph 5.3.5 of the Strategy that the Council finds '*no sound reason to depart from the HGI*' in arriving at its housing allocation is fundamentally flawed, for the following reasons:

- i) the dPS concedes from the outset that the HGI is used as the baseline, and not a tool for assessment;

ii) it impermissibly conflates the HGI with a plan allocation when it is clear that the two are not the same thing.

- 5.5 An LDP **housing allocation** is required to facilitate the development management process. The allocation must provide sufficient land to ensure a reasonable choice of residential accommodation, including affordable and retirement housing provision, in sustainable locations, over the entire Plan period.
- 5.6 In order to deliver the HGI figure, there must be a sufficient lead in period to allow permissions to be secured, infrastructure to be provided, and houses to be built. **A Plan which allocates only enough land to equate to the HGI figure is unsound**, as the Plan will effectively become redundant as a framework for development management purposes several years before its end date. Furthermore, with the unduly short plan period in this case there will be minimal scope for 'in course' corrections or reviews following Adoption. **The suggested approach is irreconcilably inconsistent with the SPPS requirement (para 6.140) for Councils to maintain a 5 year housing land supply within the District at all times.**

## **Allocation to Ballymena**

- 5.7 As noted above, the draft Strategy adopts the HGI figure as its housing allocation. It simply takes the HGI figure for Mid and East Antrim of 5,400 dwellings for the period 2012 – 2025 and extrapolates this as 7,477 for the period 2012 – 2030 and 6,230 for the plan period 2015-2030. **This is equivalent to c.425 units per annum.**
- 5.8 The proposed allocation to Ballymena (**Table A2**) is based on 23.6% of the Borough population, and adjusted slightly to equate to 1,791 houses. The minor adjustment is asserted to take account of the RDS Housing Evaluation Framework.
- 5.9 **Table A3** indicates that 800 houses have been completed in Ballymena between 2012 and 2018, hence the Plan's housing allocation for the settlement (2018-2020) is set at 991 (ie 1791-800). **Table A3** states that there is live permission for 996 houses, therefore the Plan Allocation is stated to exceed the allocation by 5 units. Taken on an annual basis between 2018 and 2030, the allocation will equate to **only 82 houses per annum** for the largest town in the Borough.
- 5.10 The allocation figure of 82 houses per annum for a settlement of 30,000 population is unrealistic and inadequate. It is absurd. Furthermore, it is inconsistent with the RDS, which has identified Ballymena as a 'main hub'. Policies SFG11 and SFG12 of the RDS seek to '*promote economic development opportunities at hubs*' and '*grow the population in Hubs and clusters of Hubs*'.



## SFG11: Promote economic development opportunities at Hubs

3.88 To compete successfully at a global level Northern Ireland's private sector needs to grow. This will lead to an increase in productivity and to an enhanced market share in products and services. This in turn will result in better employment opportunities and reductions in economic inactivity and unemployment. Inward investment needs to be attracted and local firms encouraged to grow.

- **Promote and exploit the potential for economic development.** Hubs are all performing economic roles and have potential for further economic expansion. Small businesses and service sector offices could locate in these towns.
- **Consider Hubs and clusters of Hubs first.** When new development is being considered, the relationship and benefits between towns/cities in the clusters should be taken into account. The Hub and the higher performing town/city in the cluster should be considered first in the decision process.

## SFG12: Grow the population in the Hubs and cluster of Hubs

3.89 While official forecasts are for the population of Northern Ireland to grow by 10% by 2023, this will vary across the Region. The evidence is that over the last 10 years there has been a disproportionate amount of growth in smaller settlements (Appendix B). If this pattern were to continue, it could affect the role of larger settlements and be contrary to the objectives of the Strategy for strong growth in larger urban areas.

- **Provide additional housing in the Hubs and cluster of Hubs across the Region.** Key to population growth and the associated regeneration of urban centres is the provision of additional housing. This will require sensitive design, including mixed use schemes and integration with green-space, to ensure that they link into the existing urban fabric. It will also be important to phase and manage housing growth taking account of capacity (including water supply and waste-water treatment infrastructure) or if it can be provided ahead of development without environmental harm. Regional Guidance No. 8 (RG8) sets out the process for allocating the housing figure.

- 5.11 The proposed allocation to Ballymena has been calculated from the HGI on the basis of its percentage of households. There has been no recognition of the need to have regard to the SFG12 requirement to '**provide additional housing in the Hubs**'.
- 5.12 A further glaring defect with the proposed HGI based allocation is that it is completely out of proportion to the current build rates in Ballymena. **Figure 7.4, from Technical Supplement 3 on Housing**, illustrates this disparity:

Technical Supplement 3

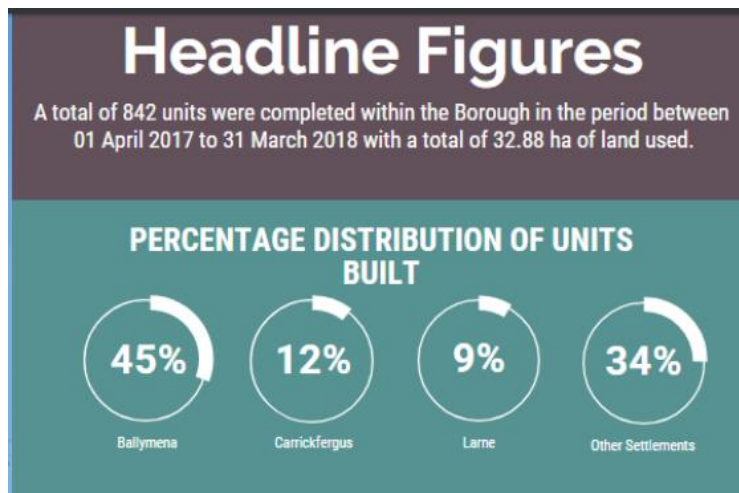
**Table 7.4** Urban and Rural housing completions 2012-2018 in comparison to yearly average 2012-2030 HGI

	2012/13	2013/14	2014/15	2015/16*	2016/17	2017/18	Total completed units
Settlement completions (Housing Monitor)	163	113	319	431	456	842	2,324
Rural completions (Building Control records)	108	87	90	95	76	83	539
Total Completions	271	200	409	526	532	925	2,863
Difference to HGI	-144	-215	-6	+111	+117	+510	+373

\*3 dwellings completed in Mill Bay added into the countryside completion count as it is a settlement proposed to be designated.

Note: The rural completions exclude replacement dwellings. The completions for the rural and urban years have been taken as per HM year so each year is 1 April to 31 March. The urban figures for earlier HM years which do not follow this pattern have been pro-rated.

- 5.13 From the above it can be seen that, as the Borough has recovered from the recent recession, the build rate in 2017/18 was 510 units higher than the proposed HGI based allocation. The dPS fails to have regard to this critical material consideration.
- 5.14 This is also confirmed in the 2018 Land Availability Monitor which again indicates that 842 units were built in 2017-2018. **Some 380 of these houses were in the largest settlement of Ballymena.**



- 5.15 Clearly, Ballymena is currently experiencing significant house building activity. **The Draft Plan allocation equates to less than 25% of the current build rate in Ballymena.** The consequence of the proposed restrictive allocation, whereby land which is not already approved is likely to be redefined as phase 2 under Policy SGS5, will mean that the available land for housing in Ballymena will be restricted, and the potential growth of the town will be constrained. The construction industry contributes substantially to the local economy, through direct



employment, and contributions to builders' suppliers, tradespeople, rates etc. A Plan Strategy which seeks to restrict the rate of building in the town by such a substantial amount is unsound.

- 5.16 The Plan's housing allocation for Ballymena must have regard to the recent build rate. If the 2017/18 delivery figure of 380 units was maintained then this would equate to some 4,500 houses up to 2030. Even a figure midway between the proposed allocation of 82 and the current build rate (ie circa 250 units) would equate to a need for about 3,000 units up to 2030. This figure would enable strategic long-term decisions to be made on additional land allocations.
- 5.17 If the plan period was extended by another 5 years (to ensure compliance with DPPN 01 and facilitate a 5 year supply at all times) then an allocation of 250pa for Ballymena would equate to a land allocation for 4,250 units.

## **Management of Housing Supply.**

- 5.18 **Policy SGS5** of the Draft Strategy notes that in some settlements (including Ballymena) the potential land available exceeds the housing allocation figure. It therefore proposes to phase housing land in the three main towns at Local Policies Stage. Policy SGS5 states that in the main towns it is intended that phase 1 land will be restricted to sites with live permissions or which are likely to be approved, and land within the urban footprint. Undeveloped and uncommitted housing zonings within the settlement limit, but outside the urban footprint, will be held in reserve as phase 2 housing land. In effect therefore, planning permission will not be granted for undeveloped lands (zoned or unzoned) around the urban fringe.
- 5.19 The proposed approach is **unsound**. It is based upon a Housing Allocation process which in itself is unsound, and the proposed phasing strategy appears to be based upon a Plan which is now some 30 years old. The Strategy fails to consider the possibility that there may be areas outside of the current settlement limit which have potential to deliver significant benefits for the town in terms of infrastructure, connectivity, choice etc. Such areas (and in particular Galgorm/Cullybackey Road) have attributes which would allow other important objectives to be met, and they should therefore be considered for development, especially given the RDS policy to grow population and enhance the role of the main hubs.

## **Deliverability**

- 5.20 The housing figures provided for Ballymena make no reference to **deliverability**. This is important, especially as some of the zonings in the current Area Plan have existed for nearly 30 years, and have remained undeveloped. It is remarkable that there is no detailed

assessment of this factor, it invites landbanking and raises the prospect of artificially inflated land prices if these lands remain unreleased and undeliverable.

- 5.22 The NPPF in England has reinforced the need to ensure that housing sites will be delivered. The 2019 NPPF definition of 'deliverable' is below:

**Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

- 5.23 It is noted that **Figure A4** of the Draft Strategy asserts significant potential for urban fringe 'whiteland' development in Ballymena. However it is unclear how this figure has been arrived at, and there is no indication as to deliverability. The 2018 Housing Monitor indicates a potential of 2,631, with about 1,669 of these being on zoned land. Historic 'garden grabbing' sites cannot and should not be relied upon to deliver significant new housing supply. To ensure that there is continuity of supply sufficient lands must be **zoned** to facilitate development and ensure that houses will be delivered on the ground within the plan period.
- 5.24 A range and choice of zoned land must be available in order to stimulate actual delivery, facilitate choice, and discourage land banking by larger developers. Furthermore, the SPSS requires Councils to ensure that, as a minimum, a 5 year supply of land for housing is maintained (para 6.140). This must mean that, even at the Plan end date of 2030, sites should remain available to support the ongoing development management process and ensure continued delivery of housing supply.
- 5.25 For the reasons stated above, the Plan's Housing Allocation Strategy is unsound and must be reviewed.

## SUMMARY

**The draft Strategy's Housing Allocation is unsound in that:**

- it fails to recognise the distinction between the HGI and a Plan Housing Allocation;

- it fails to address the need for a 5 year housing supply at all times during the plan period;
- it fails to have regard to the recent build rates; and
- it fails to consider the potential for appropriate urban extensions which have potential to deliver significant infrastructure or other benefits.

## 6.0 TRANSPORT CONSIDERATIONS

6.1 The importance of transportation issues for LDPs is set out on pages 107 and 108 of the SPPS. In particular, it states that the preparation of a LDP provides the opportunity to assess transport needs, **problems and opportunities** within the Plan area, and:

*'to ensure that appropriate consideration is given to transportation issues in the allocation of land for future development, including appropriate integration between transport modes and land use. Preparation of a local transport study will assist in this process'* (para 6.299).

6.2 Paragraph 6.301 states that transportation issues:

*'to be addressed in the LDP include reducing the need for motorised travel through allocating sites for housing development in proximity to services such as shopping, employment, health and educational facilities; walking and cycling infrastructure; or phasing of development so as to tie in with planned improvements to the network'.*

6.3 It also requires that: *'new transport schemes (including major proposals for road, rail and public transport provision) or planned improvements to the network should be identified in LDPs'.*

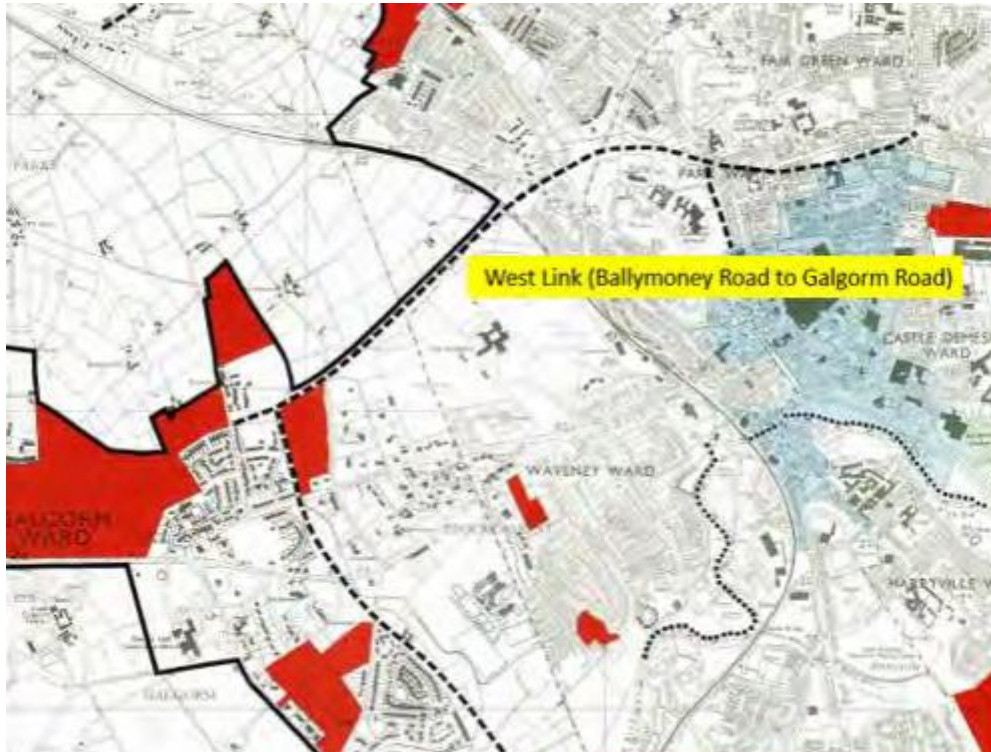
6.4 The Transportation section of the draft Strategy (9.1) provides some commentary on the existing transport provision within the Borough, but it contains little or nothing in relation to how future development patterns might be shaped by transportation considerations.

6.5 In paragraph 9.1.23 the dPS comments that:

*'The Local Policies Plan, in conjunction with the DFI Local Transport Plan and the BMTP, will determine which road lines will be afforded ongoing protection under this policy, along with any **potential new routes**'.*

6.6 Policy TR3 states that developers will be required to deliver or contribute to the cost of a transport scheme where the development relies on such a scheme, or where residents or users will benefit from proximity to a planned transport scheme.

- 6.7 The Ballymena Area Plan 1986-2001 (adopted 1989) placed significant emphasis upon the importance of road schemes to manage and improve traffic circulation around the town. Schemes envisaged include the A26 upgrade, a northern distributor from North Road to Broughshane Road; **a west link road**; a south-west link road; and Woodtown Road.



**Ballymena Area Plan – the proposed West Link from Galgorm Road to Cullybackey Road is highlighted.**

- 6.8 The Ballymena Area Plan noted that the west link road and south-west road were not likely to be implemented early in the Plan period as in general the existing systems of roads within the town would accommodate the anticipated traffic for a considerable time.
- 6.9 However some 30 years has now elapsed and the routes of these schemes remain protected. In addition, virtually all of the zoned land in the west of the town has now been developed without any contribution to the delivery of the west link. There is little or no realistic prospect of the western link road being delivered by DFI, so the only alternative is that significant private developer input will be required if this is to be delivered.
- 6.10 It is immediately evident that there is currently no zoned development land in the area between Oldpark Road and Cullybackey Road, so there can be no impetus or incentive for any private developer to deliver such an extent of road. The only way in which this important

stretch of 'missing link' road can be delivered will be by the zoning of land and incentivising private sector delivery.

- 6.11 It should further be noted that, because of the significant expense of factors such as the need for a bridge over the railway line, a substantial zoning will be needed to make such a project economically viable. Even then, the assistance of DFI will be essential in ensuring there are no land availability obstacles, and in delivering the stretch of road between Cullybackey Road and Greenmount Roundabout.
- 6.12 The west link remains the 'missing link' in the town's infrastructure, with no prospect of delivery unless additional development land is allocated to generate funds to assist in delivery. This missing link cannot be addressed unless the dPS recognises the issue, and identifies and addresses the only realistic means of securing its delivery.
- 6.13 Given the importance of transport and the need to integrate this with development locations, it is irrational that the Plan Strategy fails to consider or address the strategic benefits of long standing schemes such as the west link, and that this important aspect will be deferred to the Local Policies Plan. The approach adopted in the draft Strategy for Lisburn and Castlereagh whereby schemes of 'strategic importance' are recognised (extract below) should be adopted in Mid and East Antrim.

### Key Transportation Infrastructure Schemes

The Council recognises the importance in providing a high quality, integrated transport system that supports future growth. The Council remains committed to working with DfI Roads and public transport operators to deliver major improvements to the existing transportation network over the Plan period.

A number of key transport proposals as previously identified through the BMTP that have not yet been implemented, include:

- the M1-A1 link road
- the A24 Saintfield Road Relief Road
- the Knockmore-M1 link road
- the West Lisburn/Knockmore Halt, with associated park and ride
- completion of the North Lisburn feeder road
- Quarry Corner – Comber Road link road.

These schemes remain of strategic importance to the council area, in addition to:

- a potential new Park & Ride facility at Moira Train Station
- reinstating of the Antrim-Lisburn line for operational use.

- 6.14 For more detailed consideration of transportation aspects **see Mott MacDonald** response and associated **Systra Report** at **Appendix 1**.



## 7.0 Summary and Conclusions

7.1 The draft Plan Strategy is considered to be **unsound** in a number of respects. These include:

- the effective Plan period is unrealistically short, and fails to comply with DPPN 01;
- the Housing Allocation Strategy fails to recognise that there is a fundamental difference between the purpose of the HGIs and the purpose of a Local Plan Housing Allocation;
- the Housing Allocation fails to ensure that a 5 year housing supply will remain at all times during the plan period;
- the Housing Allocation is significantly less than recent build rates, and so will impose unnecessary constraint upon the supply and choice of housing in the Borough;
- the strategy for the management of housing supply fails to consider the potential to shape the directions of growth and improve transport integration in the main towns; and
- the transportation strategy fails to address problems and opportunities, nor does it consider the potential for long planned infrastructure to deliver improved integration between land use and transportation.

7.2 The Council is requested to consider the contents of this submission. We would be pleased to discuss any aspect.

**DONALDSONPLANNING**

**December 2019**





Site Concept

PROJECT REF: 18141  
SCALE: 1:5000 @ A3



KEY

	SUBJECT SITE		DEVELOPMENT PARCELS - RESIDENTIAL (LOWER DENSITY C.20-35 DPH NET) TO EXISTING NEIGHBOURS AND COUNTRYSIDE
	EXISTING BUILT FORM		DEVELOPMENT PARCELS - RESIDENTIAL (MEDIUM DENISTY C. 35-45 DPH NET)
	EXISTING SCHOOL (BALLYMENA ACADEMY)		DEVELOPMENT PARCELS - RESIDENTIAL (HIGH DENISTY C. 45+ DPH NET)
	EXISTING WATERCOURSE (SHEUGHS)		DEVELOPMENT PARCELS - RESIDENTIAL WITH EXTRA CARE FACILITY (MEDIUM DENSITY)
	EXISTING POND		DEVELOPMENT PARCELS - SMALL RETAIL (LOCAL CONVENIENCE)
	COMMUNITY ECOLOGICAL PARK NETWORK; INCORPORATING STREAMS, MARSHES AND WETLANDS		DEVELOPMENT PARCELS - BUSINESS PARK (OFFICES; RESEARCH AND DEVELOPMENT; INCUBATION UNITS; LIGHT INDUSTRIAL USES)
	PROPOSED PUBLIC OPEN SPACE		
	PROPOSED LANDSCAPING TO INCLUDE BUFFER TO DEFINE EDGE OF DEVELOPMENT AND SEPERATION TO EXISTING RAILWAY		
	PROPOSED LINK ROAD		
	PROPOSED PRIMARY STREETS		
	PROPOSED SECONDARY STREETS		
	PROPOSED ACCESS TO BALLYMENA ACADEMY TO INCLUDE BUS STOPS, BUS TURNING AND DROP OFF		
	PROPOSED PEDESTRIAN ROUTE / CYCLE PATH 'GREENWAY'		
	POSITIVE BUILT FRONTAGE OVER OPEN COUNTRYSIDE		





Site Analysis

PROJECT REF: 18141  
SCALE: 1:5000 @ A3



**BALLYMENA NORTH WEST DEVELOPMENT INCLUDING  
NEW RELIEF ROAD  
TRANSPORT REVIEW**



**SYSTRA**

# BALLYMENA NORTH WEST DEVELOPMENT, INCLUDING NEW RELIEF RD

## IDENTIFICATION TABLE

Client/Project owner	Donaldson Planning
Project	Ballymena North West Development, including New Relief Rd
Study	Transport Review
Type of document	Report
Date	21/12/2018
Reference number	
Number of pages	23

## APPROVAL

Version	Name		Position	Date	Modifications
1	Author	K Clarke	Director	21/12/2018	
	Checked by	K Clarke	Director	21/12/2018	
	Approved by	K Clarke	Director	21/12/2018	
2	Author				
	Checked by				
	Approved by				

**TABLE OF CONTENTS**

<b>1.</b>	<b>INTRODUCTION</b>	<b>5</b>
<b>2.</b>	<b>BALLYMENA ROAD NETWORK</b>	<b>6</b>
<b>2.1</b>	<b>EXISTING CONDITIONS – LOCAL ROADS</b>	<b>6</b>
<b>2.2</b>	<b>EXISTING CONDITIONS – STRATEGIC ROADS</b>	<b>8</b>
<b>2.3</b>	<b>FUTURE ROAD IMPROVEMENTS</b>	<b>10</b>
<b>3.</b>	<b>BALLYMENA NORTH WEST – ACCESSING NEW DEVELOPMENT</b>	<b>13</b>
<b>3.2</b>	<b>EXISTING ACCESS ROUTES</b>	<b>13</b>
<b>3.3</b>	<b>POSSIBLE FUTURE ACCESS ROUTES</b>	<b>14</b>
<b>3.4</b>	<b>SUSTAINABLE TRANSPORT</b>	<b>16</b>
<b>3.5</b>	<b>SUMMARY</b>	<b>17</b>
<b>4.</b>	<b>BUILDING THE SWDW</b>	<b>19</b>
<b>5.</b>	<b>SUMMARY AND CONCLUSIONS</b>	<b>20</b>

**LIST OF FIGURES**

Figure 1.	Existing Local Roads	6
Figure 2.	Existing Strategic Roads	9
Figure 3.	Future Road Improvements (EDR)	10
Figure 4.	Future Road Improvements (SWDW)	12
Figure 5.	Existing Access Routes	13
Figure 6.	Future Access Routes (1)	15
Figure 7.	Future Access Routes (2)	16
Figure 8.	Alternative Complete SWDW Using Cromkill Road	21

## **1. INTRODUCTION**

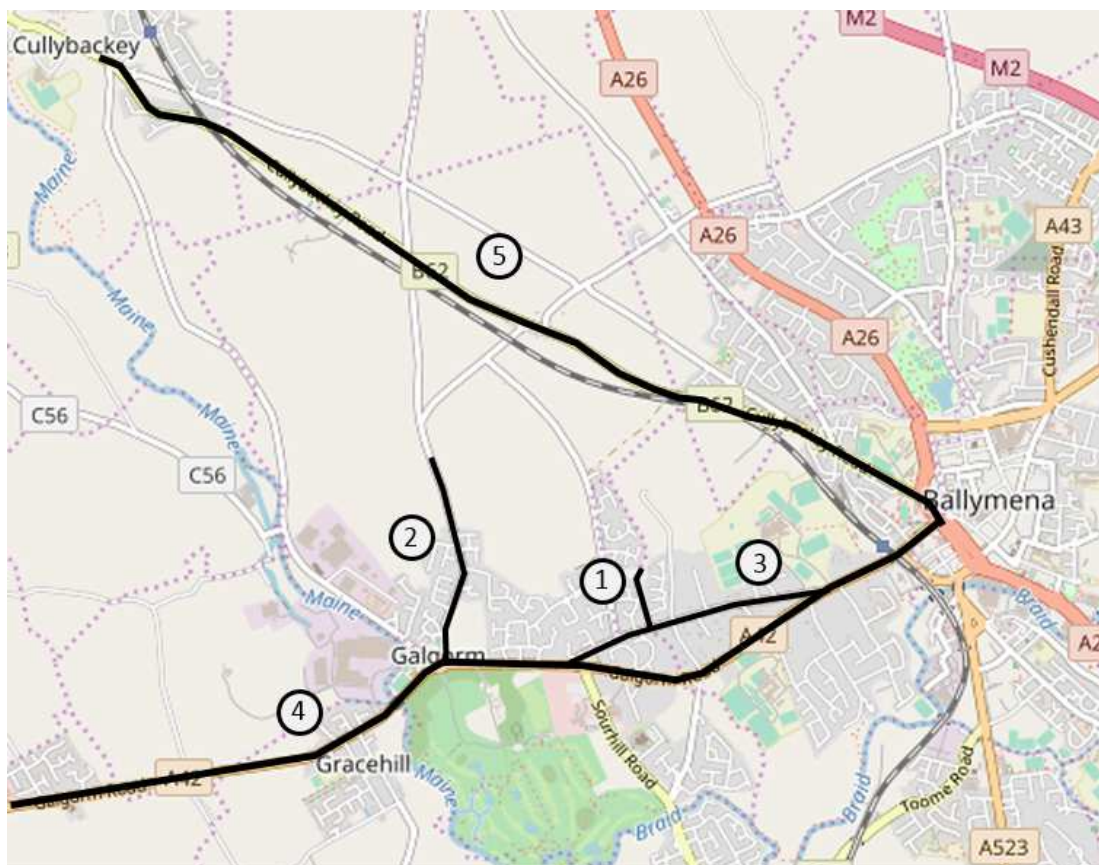
- 1.1.1 SYSTRA Limited has been commissioned to consider the transport requirements to develop a significant portion of land located in Ballymena North West. The purpose of the report is to identify the development opportunities which this site provides and therefore to assist the emerging Local Development Plan process.
- 1.1.2 The land is bounded by Old Park Road to the west, Cullybackey Road and the adjacent rail line to the east and the built development along the northern edge of Ballymena, including the Ballymena Academy.
- 1.1.3 The proposed development would be residential led and likely to include associated and supporting commercial uses including local facilities. This overview consideration of transport matters does not seek to undertake a formal Transport Assessment of any development related transport impacts.
- 1.1.4 SYSTRA has significant knowledge of transport conditions in Ballymena and are familiar with the current transport issues and future opportunities to improve transport in and around the town.
- 1.1.5 The existing Local Plan identifies a new relief road, the South West Distributor and Westlink, an element of which passes through the proposed development site. A Roads Service scheme drawing for the proposed new relief road (South West Distributor and Westlink (Ballee to Ballymoney Road), dated 1999), is available. The scheme has been included in the Area Plan for decades. With the Local Development Plan under review, it will be a requirement for the need for the road scheme to be reassessed. This should take the form of a Local Transport Study (LTS), as referred to in the Strategic Planning Policy Statement (SPPS). This study is likely to be undertaken by the Department for Infrastructure.
- 1.1.6 As will be described later in the report, the road scheme, or at least part of that scheme would contribute significantly to the scale of development on the identified lands. This is as a consequence of firstly, providing a higher quality of access into and through the site and secondly, the benefit of the proposed new relief road in providing an alternative route around Ballymena town centre and therefore relieving traffic congestion currently arising within the town centre.
- 1.1.7 Therefore, an early recommendation of this report is to ensure that in the development of the emerging Local Development Plan, an appropriate assessment of the South West Distributor and Westlink is undertaken to identify the benefits which these infrastructure schemes provide to Ballymena, including reduced traffic congestion, with, undoubtedly, associated environmental benefits.
- 1.1.8 The remainder of this report seeks to describe the existing traffic situation, future changes in the road network serving the town and development options available in association with various transport measures, including the provision of the new relief road.

## 2. BALLYMENA ROAD NETWORK

### 2.1 Existing Conditions – Local Roads

- 2.1.1 The proposed development is located to the north west of Ballymena town centre. The local roads that would be affected by new residential development are likely to include Old Galgorm Road, Galgorm Road, Old Park Road, Old Manor Place and Cullybackey Road.
- 2.1.2 The extent to which these roads would be impacted upon would be directly related to the scale of development and the associated road infrastructure provided to support that development.
- 2.1.3 SYSTRA undertook a site visit in April 2018.
- 2.1.4 Figure 1 – Ballymena Local Roads, indicates the local roads likely to be affected by development on the Ballymena North West site.

**Figure 1. Existing Local Roads**



**Old Galgorm Manor (1)**

- 2.1.5 Old Galgorm Manor is a single carriageway road providing access to a cul-de-sac residential development. The road is designed to be a part of the new relief road referred to in paragraph 1.1.5 above. There is no frontage access onto this road section to allow the road to perform that function. There are footways on both sides of the road and no verges. The priority junction between Old Galgorm Manor and Old Galgorm Road is a simple junction layout (no ghost island). The “development capacity” of a junction of this form is generally seen as supporting around 50 residential units, which broadly equates to 500 vehicles per day (vpd) using the minor road, before requiring to be upgraded to include a ghost island. This broadly reflects the level of housing development already accessed through this route.
- 2.1.6 Note that the “development capacity” of the junction is informed by guidance in DCAN15 and Creating Places regarding the level of residential development considered feasible from access roads and junction types. Development capacity is different from the operational traffic capacity of a junction, which would usually demonstrate that an access can support higher levels of development than inferred by the “development capacity”.

**Old Park Road (2)**

- 2.1.7 Old Park Road is a single carriageway road running north-south from Old Galgorm Road to Woodtown Road to the north. Woodtown Road links back to Cullybackey Road, with a level crossing arrangement over the railway. Old Park Road supports a number of residential developments as well as supporting development with direct frontage access onto the south section of the road. There are footways on both sides of the road and generally no verges. The junction between Old Park Road and Old Galgorm Road is a simple priority junction. The junction has a “stop line” rather than a give way, which implies that there is reduced visibility at the junction. The development capacity of a junction of this form is similar to that above, around 50 residential units or 500vpd. However, given that the road is not a cul-de-sac, significantly more development is already in place.

**Old Galgorm Road (3)**

- 2.1.8 Old Galgorm Road is a single carriageway with variable standard along its length. At the west end the road has a continuous footway on the north side and limited footway provision on the south. Moving east the footway provision changes but the road standard is generally poor including width and vertical geometry constraints. The eastern section is generally of a better standard with residential development on both sides, relatively consistent road width and good footway provision on both sides of the road.
- 2.1.9 Old Galgorm Road is probably best classed as a local distributor although with frontage access, variable standard and relatively poor facilities for pedestrians and cyclists it is well short of modern design standards for a local distributor.
- 2.1.10 At the eastern end Old Galgorm Road joins with Galgorm Road. The junction is a ghost island priority junction with relatively poor geometry. The acute angle at which the roads meet make visibility from Old Galgorm Road poor and turning left from Galgorm Road more challenging. Entry to Ballymena Academy is located on Galgorm Road around 30m from the Old Galgorm Road junction. The exit from the Academy is on Old Galgorm Road.



- 2.1.11 At the western end the road joins Galgorm Road at Sourhill Roundabout. This roundabout is a double roundabout junction with the second roundabout closer to Ballymena town centre and providing access to Sourhill Road and the County Hall.
- 2.1.12 While SYSTRA hasn't had the opportunity to watch these roundabouts operate it is anticipated that the junction struggles to accommodate peak hour traffic, principally because the roundabouts are so closely space.

#### **Galgorm Road (4)**

- 2.1.13 Galgorm Road is a significant road in the hierarchy of Ballymena supporting significant east-west movement and connecting into the main traffic signal gyratory at the bottom of the town centre. The rail and bus stations are both accessed from Galgorm Road.
- 2.1.14 Galgorm Road is a wide single carriageway. The road has frontage access and a moderate number of minor roads joining the route. Town side of Old Galgorm Road, Galgorm Road becomes particularly busy. The traffic signal junction with Waverley Road (one way into junction) is a constraint but the key junction is that between the A26 and Galgorm Road which is heavily congested during peak traffic periods.
- 2.1.15 The A26/Galgorm Road junction is part of a string of traffic signal junctions at the bottom end of Ballymena town centre all of which operate at or beyond capacity.

#### **Cullybackey Road (5)**

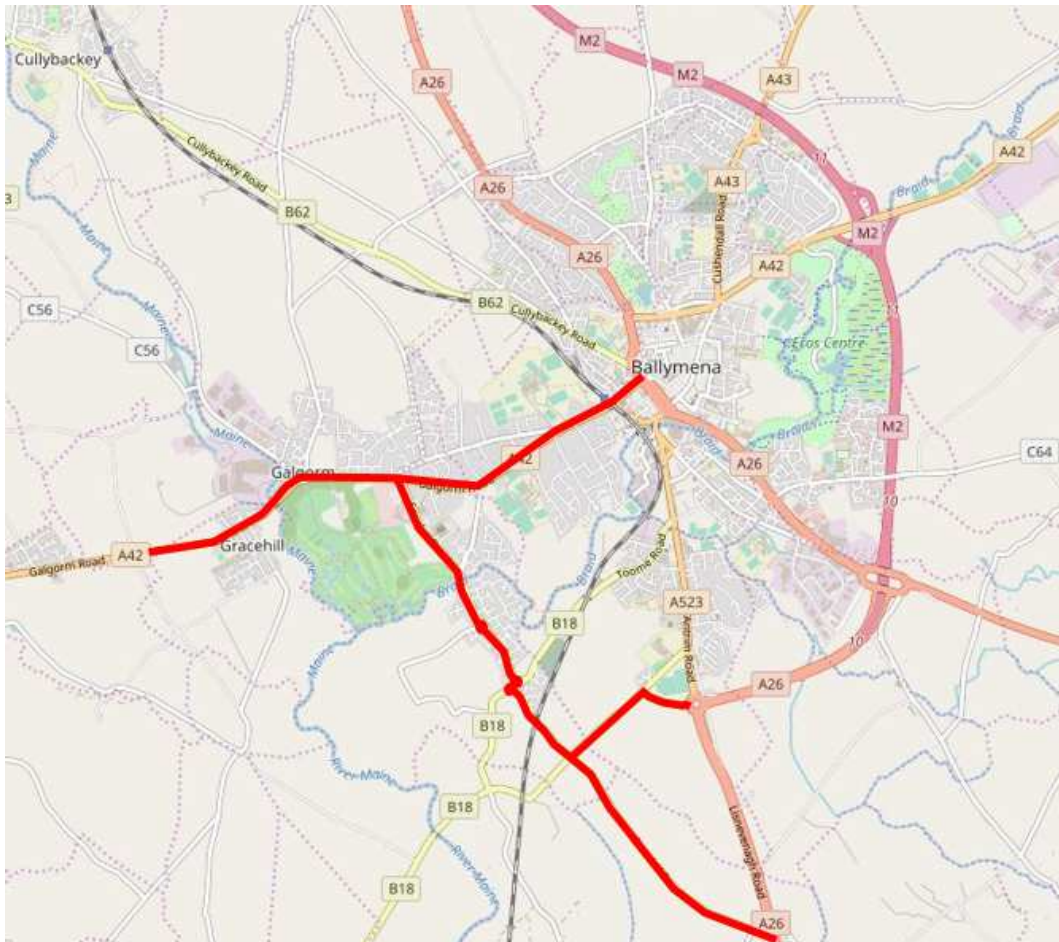
- 2.1.16 Cullybackey Road also provides an opportunity to access the site. There is an existing road over rail bridge from Cullybackey Road into the east side of the development opportunity lands. This is substandard and unlikely to be able to be used for development.
- 2.1.17 Countryside the road is wide with verges and footways, however, the closer to the town the narrower and more constrained the road becomes. From Upper Princes Street towards the town centre the road width is generally narrower with frontage access, on street parking and reduced width footways. Note that Upper Princes Street provides access to the bus and rail Park and Ride.
- 2.1.18 St Colmcille's Primary and St Louis Grammar Schools are both accessed from this section of Cullybackey Road.
- 2.1.19 Cullybackey Road links onto the A26 at a roundabout. The A26 is the town's western ring road. While SYSTRA has not viewed the operation of the junction and road in peak periods it is likely that the roundabout will be operating around capacity and the road will be congested during peak periods and certainly around school start and end of day.

## **2.2 Existing Conditions – Strategic Roads**

- 2.2.1 There are a number of key strategic roads in the west side of Ballymena. The A26 is the town's western ring road, linking from Broughshane Road in the north to the Larne Link Road in the south and east. The route is generally dual carriageway standard. A number of junctions along the route operate at or beyond capacity during peak periods. Any major development in and around the town will have an impact on this strategic route.

2.2.2 Figure 2 indicates the existing strategic roads likely to be affected by development in Ballymena North West.

**Figure 2. Existing Strategic Roads**



2.2.3 As previously indicated Galgorm Road is also a strategic route serving Ballymena.

2.2.4 Of importance to this assessment is the route between Galgorm and the A26 to the south and east of Ballymena. The current route involves Sourhill Road leading to Tullygarley Road, Cromkill Road and Ballee Road (West). The combination of this route is an unofficial southern bypass of the town. The route is generally single carriageway and along most of its length of good standard with limited frontage access and good junction arrangements. The poorest section of the road is between Galgorm Road and Dans Road, where there are junctions without a ghost island, most notably access to County Hall, which impact on through traffic and also limited footway provision (one side only).

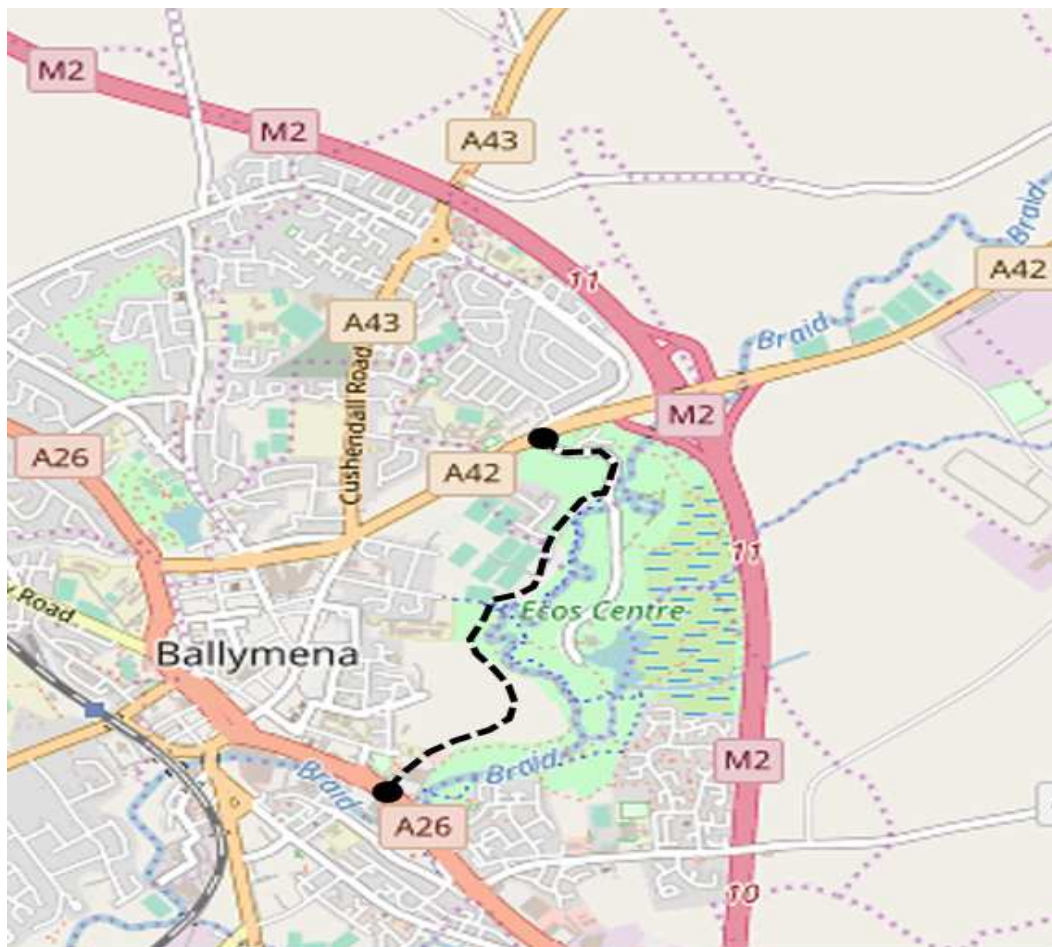
## 2.3 Future Road Improvements

- 2.3.1 For some years there have been two “alternative” future road schemes being considered in Ballymena involving Eastern and South & West Distributor and Westlink road alternatives.

### Ballymena Eastern Distributor

- 2.3.2 The Eastern Distributor Road (EDR) links Broughshane Road and the Larne Road Link with a new single carriageway distributor road through the Ballymena Showgrounds and St Patricks Barracks site. A planning application which includes this route was submitted in 2017. Planning approval has yet to be granted.
- 2.3.3 The benefit of the proposed road is to provide an alternative route to the roads through the town centre. While the route provides some relief to the A26 Western Distributor it provides greater benefit to the town centre and residential routes to the east of the town where there is already significant rat running traffic avoiding other congested areas of the town.
- 2.3.4 The Eastern Distributor provides little measurable relief to the A26 (North Road) / Galgorm Road junction which will continue to be one of the poorest operating junctions in the town.

Figure 3. Future Road Improvements (EDR)

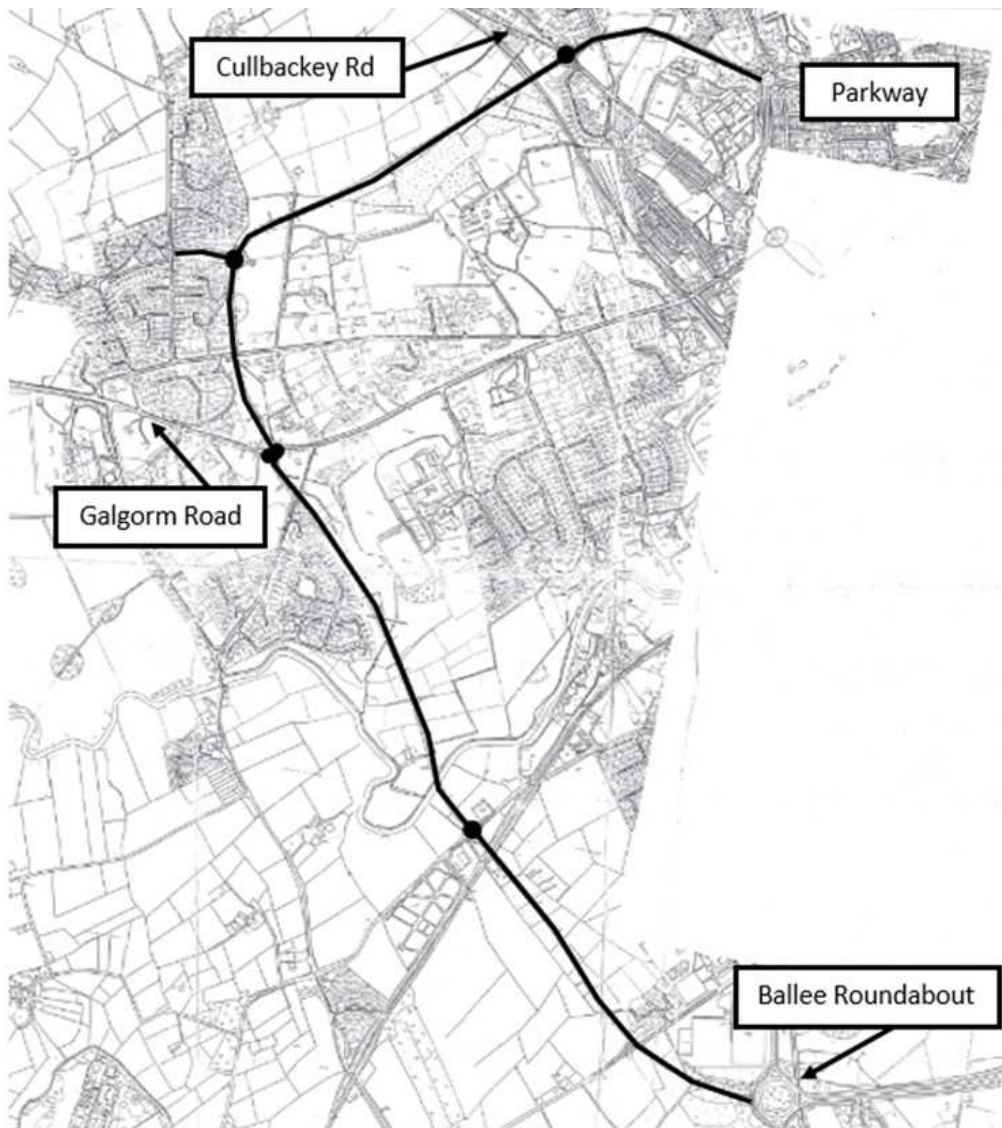


**South West Distributor and Westlink (Ballee to Ballymoney Road) (SWDW)**

- 2.3.5 The SWDW is a proposed single carriageway link from the Greenmount Roundabout (A26 / Parkway) linking across the western edge of Ballymena, connecting with Galgorm Road and then onwards to connect with the A26 at Ballee Roundabout. The route is directly through the development lands currently under consideration.
- 2.3.6 This new relief road has been in the Ballymena Area Plan for many decades. The road has no status in the Department for Infrastructure roads programme.
- 2.3.7 The future of this new relief road requires to be considered in detail through DfI undertaking a Local Transport Study (referred to in SPPS). When the relief road was first proposed there was no development associated with the route, making its delivery the direct responsibility of the roads authority (now DfI).
- 2.3.8 There is no doubt about the value of the SWDW to Ballymena. A report funded by the Department for Communities (DfC) in 2011 considered the impacts of providing either an EDR or a SWDW and the SWDW provided significant benefits, particularly around the west and south ends of the town and significant relief to the key constrained junctions along the A26 and the bottom of the town centre. The level of relief offered was in the order of:
- A26 (North Road) – 40% reduction in traffic (Around 1000vph to 600vph);
  - Cullybackey Road – 40% reduction in traffic (Around 900vph to 500vph);
  - Galgorm Road – 40% reduction in traffic (Around 1900vph to 1100vph).
- 2.3.9 Beyond these strategic traffic benefits, the new relief road would also provide an alternative means of access into the local St Louis Grammar and Ballymena Academy secondary schools, providing local traffic relief on Galgorm Road and Culleybackey Road.
- 2.3.10 With this level of strategic and local relief on the key links which a major development at Ballymena North West would affect, there is no doubt that the SWDR would not only provide significant community benefit through reduced congestion but also provides the opportunity to open up the development lands being considered.
- 2.3.11 Note that it could be argued that, with the overall improvements of the roads between Galgorm Road and Ballee Road (West) linking to the A26, it is no longer necessary to construct the section of the SWDW between Galgorm Road and Ballee. However, the weakest section of the improved existing route is Sourhill Road and the Sourhill Roundabout



Figure 4. Future Road Improvements (SWDW)



### 3. BALLYMENA NORTH WEST – ACCESSING NEW DEVELOPMENT

3.1.1 SYSTRA has considered the development potential of the proposed Ballymena North West site as defined through available appropriate access. The assessment has considered a number of options and sought to quantify levels of development associated with each of these.

3.1.2 Note that these numbers are estimates based on experience and without the back up of local traffic data or traffic modelling. Confirmation of any significant levels of development potential will require undertaking more detailed traffic studies and junction modelling.

#### 3.2 Existing Access Routes

##### Old Galgorm Manor (linked to Old Galgorm Road) (1)

3.2.1 The development potential of Old Galgorm Manor is extremely limited. It may be possible to undertake junction analysis to demonstrate available capacity, but it is unlikely that any more than 10 to 20 residential units could be supported.

Figure 5. Existing Access Routes



**Old Park Road (2)**

- 3.2.2 The development potential of Old Park Road is also extremely limited. Although the road is not a cul-de-sac, the development related traffic impacts are likely to focus on the Old Galgorm Road / Old Park Road priority junction where the reduced visibility will restrict development.
- 3.2.3 Experience would suggest that it may be possible to achieve more than 20 but certainly less than 50 units accessing onto Old Park Road. This constraint is associated with the standard of the Old Park Road junction onto Old Galgorm Road.

**Cullybackey Road (existing overbridge) (3)**

- 3.2.4 It may be possible to upgrade the existing road over rail bridge from Cullybackey Road to achieve development. The constraints around this means of access would relate to the traffic capacity of the junction, the view of the Department regarding maximum number of units off a cul-de-sac and traffic impact on Cullybackey Road and the Cullybackey / A26 roundabout.
- 3.2.5 SYSTRA would estimate that more than 100 units and possibly up to a maximum of 200 units could be achieved using this single point of access;

**3.3 Possible Future Access Routes****Old Galgorm Manor (roundabout on Galgorm Road) (1)**

- 3.3.1 If Old Galgorm Manor was extended to link directly to Galgorm Road then the development potential of this access could increase. Note that this new link is a section of the SWDW link road. The delivery of this new link would require Old Galgorm Road to be stopped up. The stopping up is unlikely to have significant traffic consequences local to this area.
- 3.3.2 While building a new roundabout (or priority) junction onto Galgorm Road would overcome any traffic capacity issues around the access, any significant development would also have an impact on key local junctions, for example the Galgorm Road / North Road junction.
- 3.3.3 Given these constraints SYSTRA would estimate that more than 100 units and possibly up to a maximum of 200 units could be achieved using this single point of access.

**Cullybackey Road (New Roundabout and Overbridge) (2)**

- 3.3.4 It may be possible to provide a new roundabout and road connection and new road over rail bridge from Cullybackey Road to access the site. This new roundabout, road and bridge would form part of the SWDW. The constraints around this means of access would relate to the view of the Department regarding maximum number of units off a cul-de-sac and the impact of any new development on the Cullybackey Road and junctions.
- 3.3.5 SYSTRA would estimate that more than 100 units and possibly up to a maximum 200 units could be achieved using this single point of access.



**Cullybackey Road (New Roundabout plus Loop Road to Existing Overbridge) (2+3)**

- 3.3.6 Creating a loop road would in principle increase the level of development that could be achieved. However, the overriding constraint would continue to be traffic impact on Cullybackey Road and associated junctions.
- 3.3.7 Therefore, even with this enhanced road infrastructure it would be unlikely that more than 200 units could be constructed.

**Figure 6. Future Access Routes (1)****Cullybackey Road to Galgorm Road Link (see Figure 7 below) (1)**

- 3.3.8 Creating a distributor road standard relief road between Cullybackey Road and Galgorm Road would provide an alternative route for traffic between these two points. While this would provide some relief on the existing road network, the benefits would be more localised than that achieved through completion of the full SWDW.
- 3.3.9 If the new relief road were to encourage a reduction of 200 vph (around 30% of the benefit of the full link) on both Cullybackey Road and Galgorm Road then the localised traffic reductions would offer the opportunity for significant levels of residential development on the proposed development site (500+ residential units) without a significant impact on the wider transport network.



### Greenmount Roundabout to Galgorm Road Link (2)

- 3.3.10 Creating a distributor road standard link between Greenmount Roundabout and Galgorm Road would achieve significant traffic relief in the lower section of the Ballymena town centre and the opportunity to relieve traffic congestion around the St Louis Grammar and Ballymena Academy secondary school accesses. The new relief road would also then offer the opportunity for drivers to use the already improved and reasonable quality road link between Galgorm Road and Ballee Roundabout, created through incremental improvements already undertaken to the Sourhill Road, Tullygarley Road, Cromkill Road and Ballee Road.
- 3.3.11 The level of traffic relief which could be achieved could be up to 80% of the relief being offered by the complete SWDW and Westlink and of the order of 300vph on Cullybackey Road and 600vph on Galgorm Road. Therefore, with this new relief road in place it should be possible to achieve full development of the Ballymena North West site (800+ houses).

Figure 7. Future Access Routes (2)



## 3.4 Sustainable Transport

- 3.4.1 The provision of sustainable transport links is embedded in all levels of transport policy in Northern Ireland, from the “Regional Development Strategy”, “Ensuring a Sustainable Transport Future – A New Approach to Regional Transportation”, SPPS and associated PPS’s and clearly will be a theme within the emerging Local Development Plan.
- 3.4.2 Accessibility mapping undertaken to inform the emerging plan indicates that the proposed Ballymena North West Development site is around a 30 minute walk and 15 minute cycle from Ballymena town centre.

- 3.4.3 The new relief road, as a distributor road standard or equivalent, will require to provide direct footway and cycle facilities. Similarly, any new development will also be required to improve accessibility by sustainable transport modes. These improvements will enhance the permeability and accessibility of not only the proposed development site but also the existing areas of Ballymena around that site. The new relief road will also enhance connectivity between those adjacent residential areas and the town centre and to the local schools.
- 3.4.4 Therefore, the new infrastructure, road and associated pedestrian and cycle facilities will not only improve connectivity but also accessibility by sustainable travel modes.

### 3.5 Summary

#### 3.5.1 In summary:

- The proposed development site has a number of possible access strategies. However, these would generally involve small numbers of additional residential units off of existing access roads into the site;
- If a new relief road was formed between Cullybackey Road and Galgorm Road, the development potential of the site would increase significantly. Moreover, the new relief road would provide local traffic relief, improved access to the Grammar and Academy and improved accessibility, permeability and connectivity between existing residential areas and the town centre.
- If the SWDW, which connected the Greenmount Roundabout to Galgorm Road was constructed, then beyond the local benefits indicated above, there would be significant traffic relief through this area and through the congested junction to the south of Ballymena town centre.
- In all circumstances a new relief road through the proposed development site would improve sustainable transport links through this area of Ballymena.

Table 1. Development Access Options and Potential

ACCESS OPTION	DEVELOPMENT POTENTIAL (RESIDENTIAL UNITS)	ROAD IMPROVEMENTS	CONSTRAINTS
Old Galgorm Manor	10-20	None	Junction capacity
Old Park Road	20-50	None	Junction visibility
Cullybackey Road (existing bridge)	100-200	New bridge and priority junction on Cullybackey Road	Capacity of Cullybackey Road and A26 junctions
Old Galgorm Manor linked to Galgorm Road	100-200	New road link to Galgorm Road and roundabout junction. Stop up Old Galgorm Road	Capacity of Galgorm Road and A26/Galgorm Road junction
Cullybackey Road (new road, roundabout and bridge)	100-200	New roundabout, road and bridge	Capacity of Cullybackey Road and A26 junctions
Cullybackey Road Loop (new road, roundabout and bridge plus loop to existing bridge)	200	New roundabout, road and bridge, replacement bridge and priority junction onto Cullybackey Road	Capacity of Cullybackey Road and A26 junctions
Cullybackey Road to Galgorm Road Link	500+	2 new roundabouts, new rail bridge and link road	Capacity of Cullybackey Road, Galgorm Road and A26 junctions
Greenmount Road to Galgorm Road Link	800+	2 new roundabouts, new rail bridge and extended link road	Probably capacity of Sourhill Road to accommodate rerouted traffic

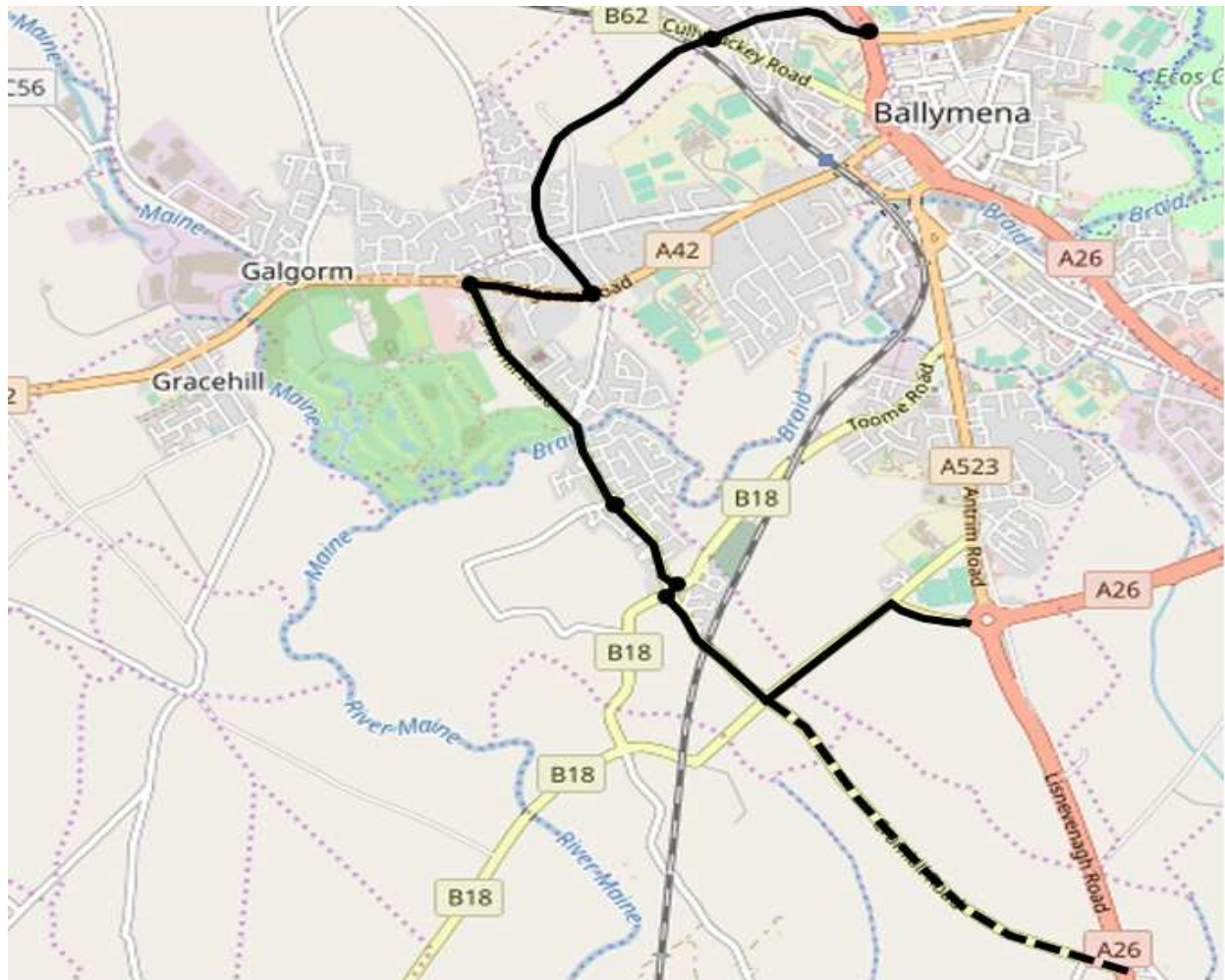
## 4. BUILDING THE SWDW

- 4.1.1 As indicated earlier in this report the relief road in the existing development plan would provide significant relief within Ballymena town centre, provide improved access to the St Louis Grammar and Ballymena Academy, enhance sustainable transport link in the north west of the town and provide an environment which could support development of the Ballymena North West development site.
- 4.1.2 Under these circumstances it is essential that Mid and East Antrim Council and the DfI undertake an appropriate transport assessment of the SWDW or at least that part of the route between Greenmount Roundabout and Galgorm Road to ensure that the new relief road remains in the development plan. This section of road also has the benefit of allowing the development potential of Ballymena North West development site to be realised as a consequence of the significant relief which the road provides to Ballymena town centre.
- 4.1.3 The requirement for developments to contribute to strategic infrastructure is indicated in SPPS. The opportunity for the proposed Ballymena North West development to require to provide a contribution towards the delivery of the new relief road significantly improves the probability that the infrastructure can be delivered.
- 4.1.4 However, it is also clear that the new relief road would have significant public and community benefits and should attract funding from DfI, particularly in relation to the road section between Greenmount Roundabout and the proposed Ballymena North West development.

## 5. SUMMARY AND CONCLUSIONS

- 5.1.1 SYSTRA has undertaken a desk study to determine the possible development options for a major site in Ballymena North West. This is a high level study using estimated numbers and generally based on experience, without the back up of local traffic data or traffic modelling. Confirmation of any significant levels of development potential will require undertaking more detailed traffic studies and junction modelling.
- 5.1.2 While there are a number of existing access opportunities which could be made to serve the site, the development potential which these offer are limited and certainly no more than 50 residential units. All of these options are constrained by local capacity issues relating to poor junction formats.
- 5.1.3 SYSTRA has also identified a number of more major interventions which would overcome local capacity constraints. While these provide the opportunity for higher levels of development, possibly up to 200 units, the level of development will be constrained by more significant traffic capacity issues on the roads and junctions which development related traffic will impact upon.
- 5.1.4 By building a significant section of the SWDW, the development potential of the site will be significantly enhanced (500+ residential units). Again the constraint to development will be development related traffic impact on the wider network. These traffic and development numbers are initial estimates and require to be confirmed through more detailed assessment.
- 5.1.5 By completing the SWDW between Greenmount Roundabout and Galgorm Road the full development potential of the Ballymena North West development site is likely to be achieved. It is clear that to the construction of this new relief road will provide significant traffic relief to the A26 and Galgorm Road, improve connectivity and accessibility in relation to existing residential areas and the Grammar and Academy while also providing improved permeability for sustainable travel modes. All of these benefits create an opportunity for new residential and associated development in the Ballymena North West development site.
- 5.1.6 It is recognised, as indicated in SPPS, that there will be a responsibility on the developer of the Ballymena North West site to contribute to the provision of the new relief road. It is also recognised that the significant benefits which the new relief road would provide to the wider community would generate a need for DfI to seek to contribute to such a scheme.
- 5.1.7 SYSTRA would strongly recommend that in support of the emerging Local Development Plan a LTS is prepared which considers the provision of the new relief road and the issues around the proposed development at Ballymena North West.
- 5.1.8 Note that it could be argued that, with the overall improvements of the roads between Galgorm Road and Ballee Road (West) linking to the A26, it is no longer necessary to construct the section of the SWDW between Galgorm Road and Ballee. This is indicated in Figure 8 below. However, the weakest section of the improved existing route is Sourhill Road and the Sourhill Roundabout.

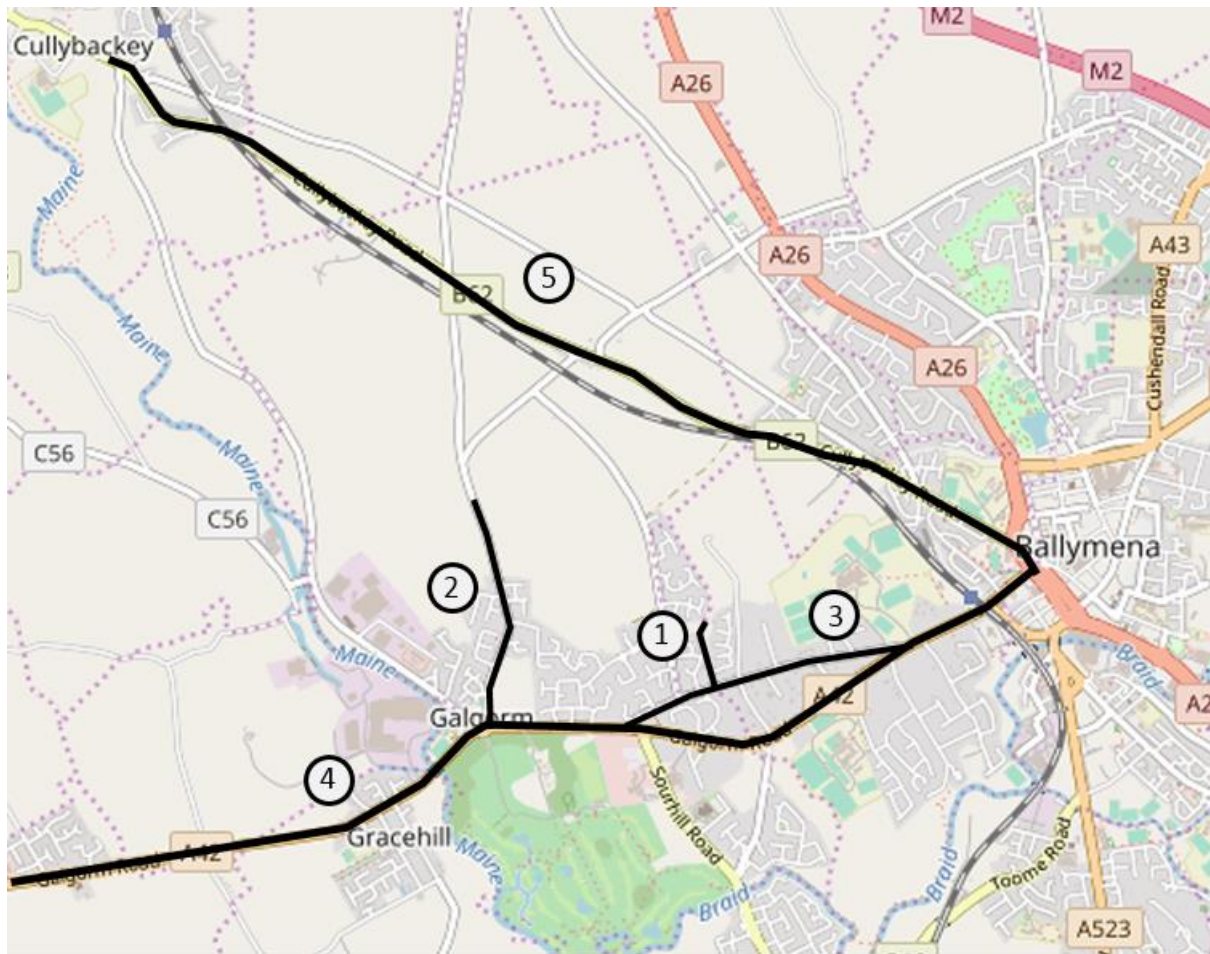
Figure 8. Alternative Complete SWDW Using Cromkill Road



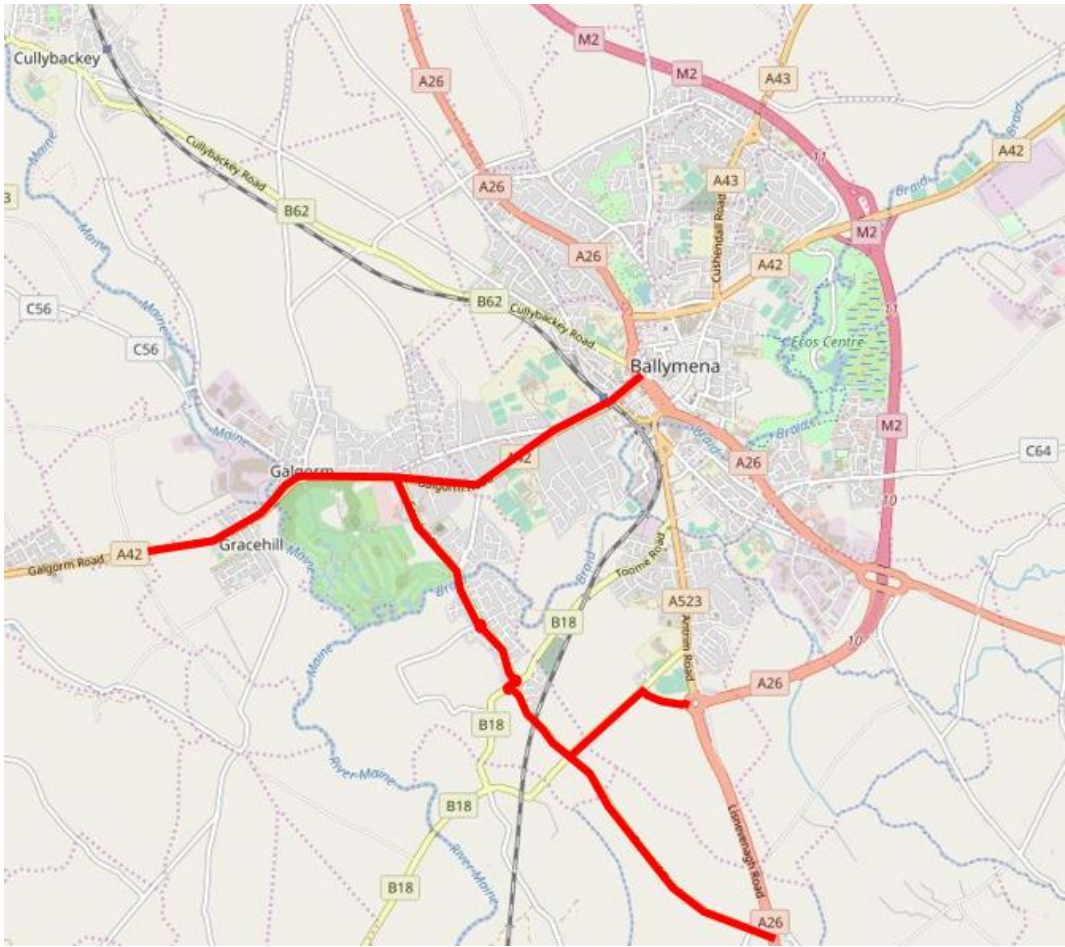
**Appendices**

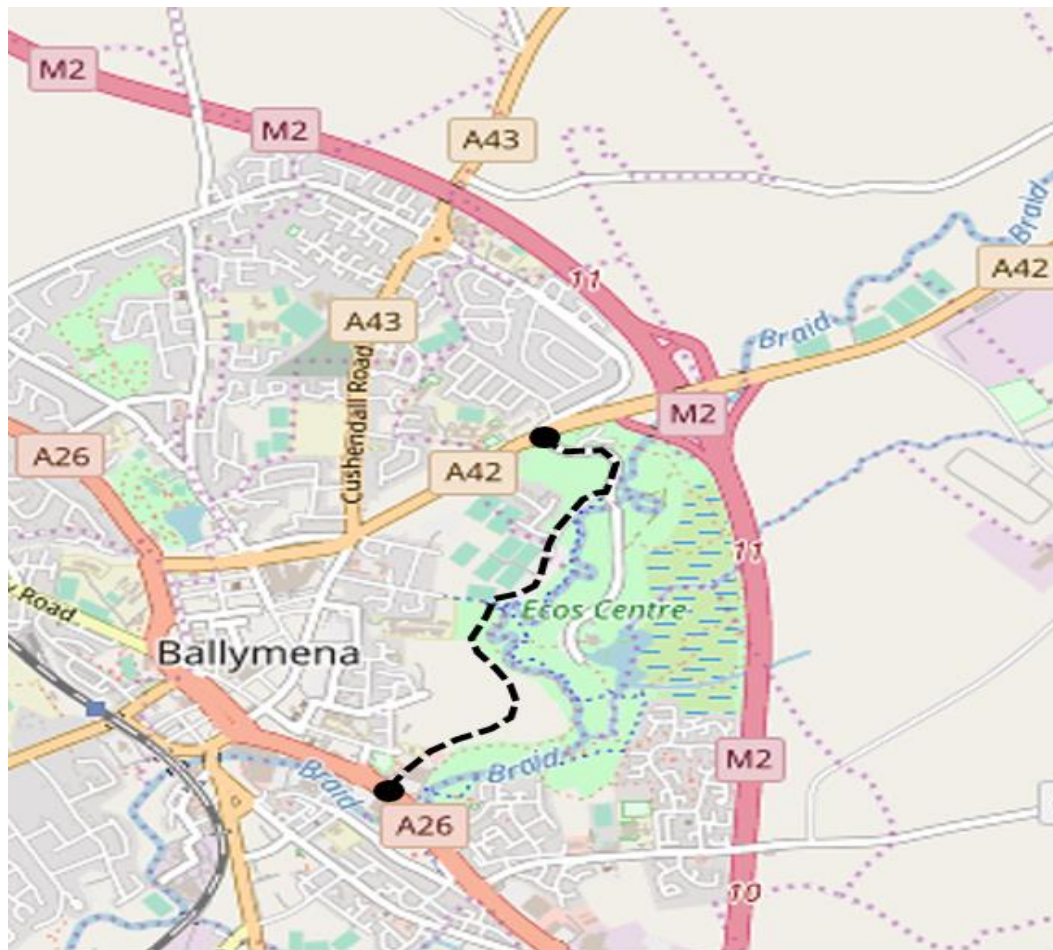
**Figures**

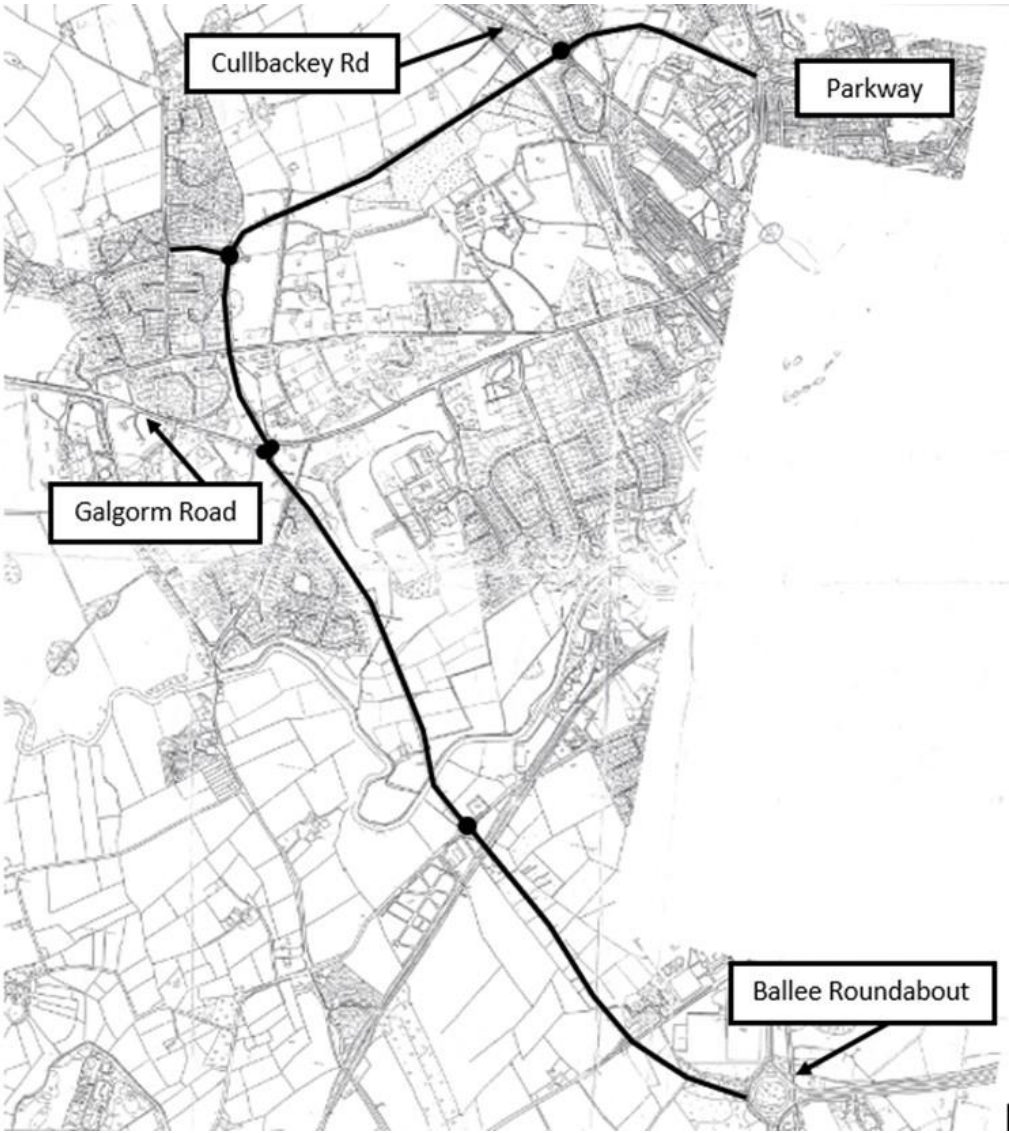




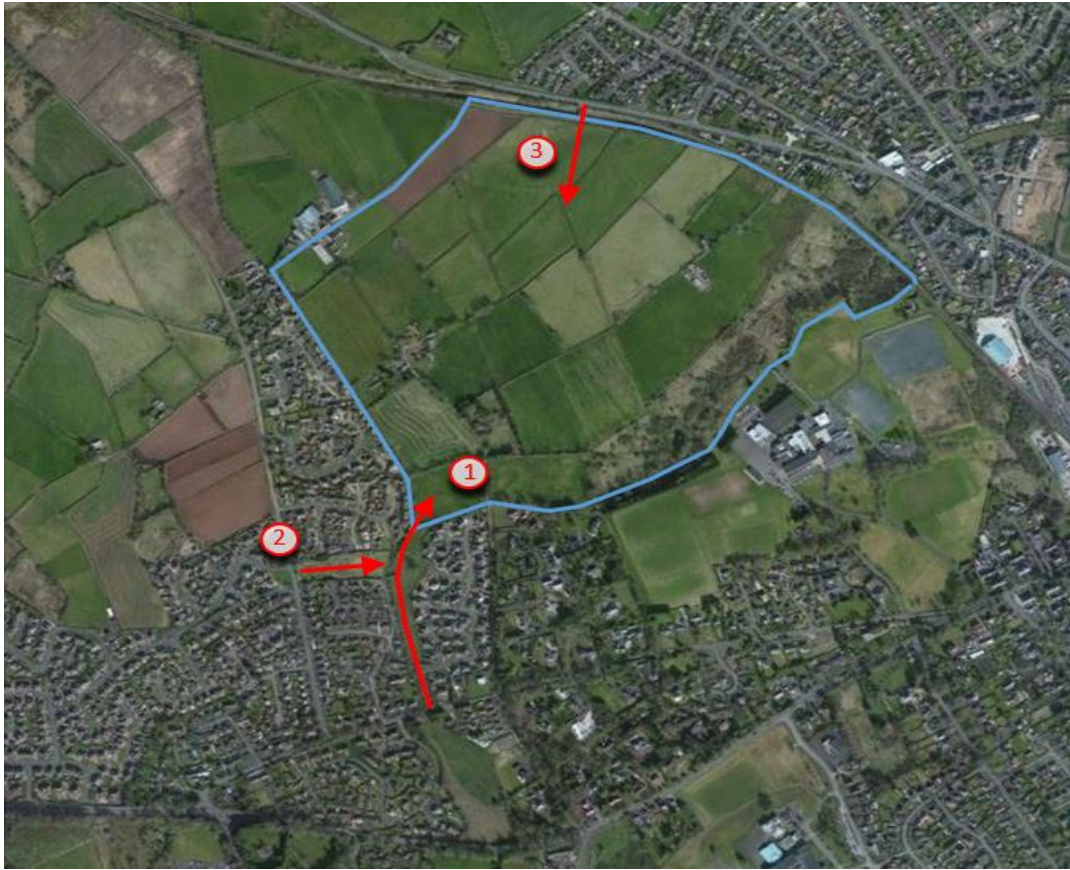


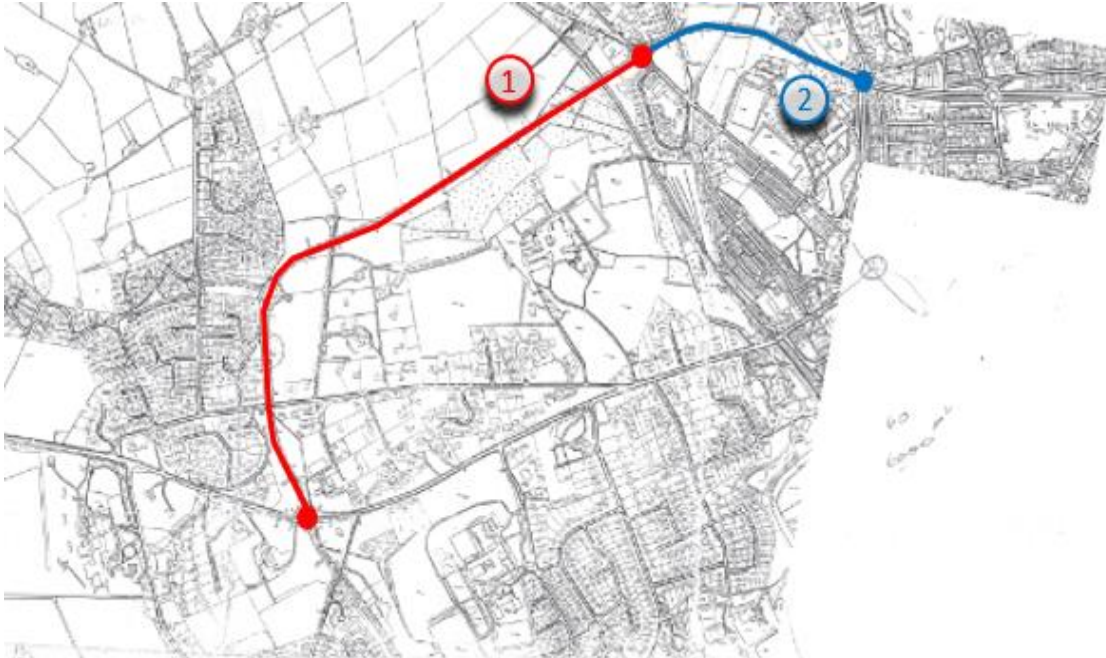
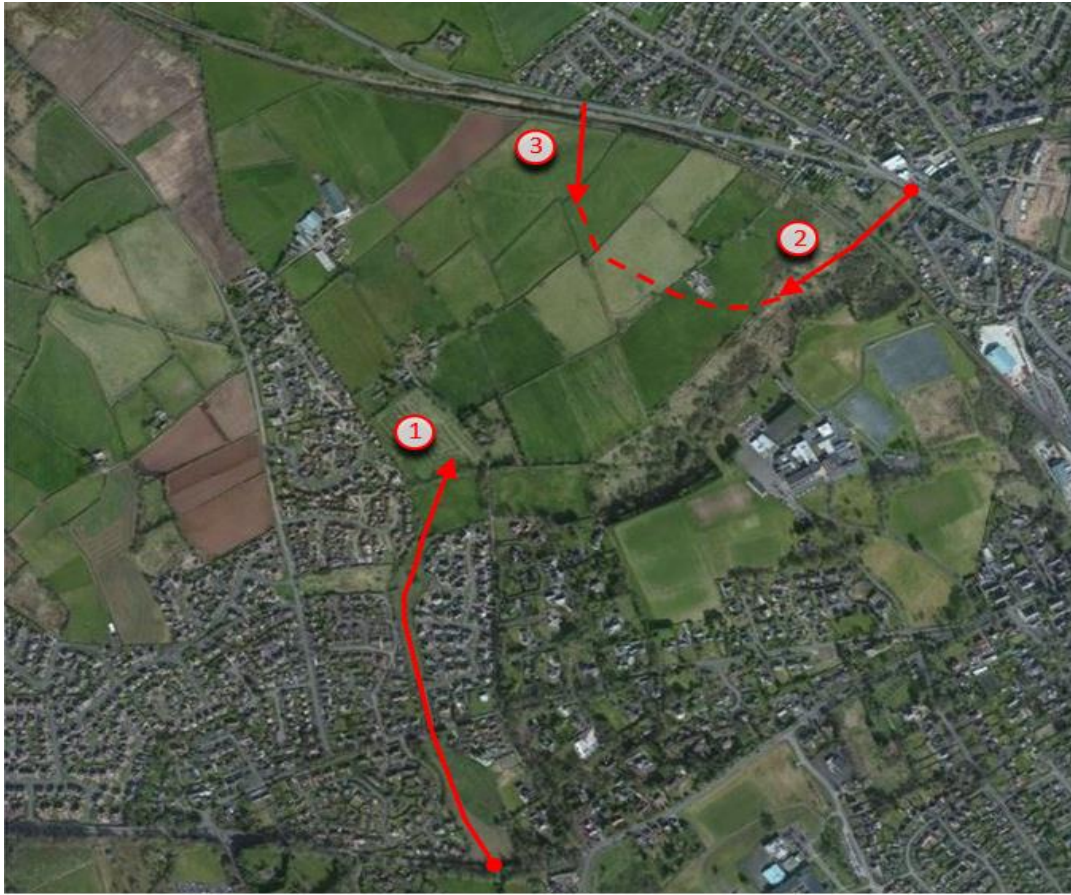




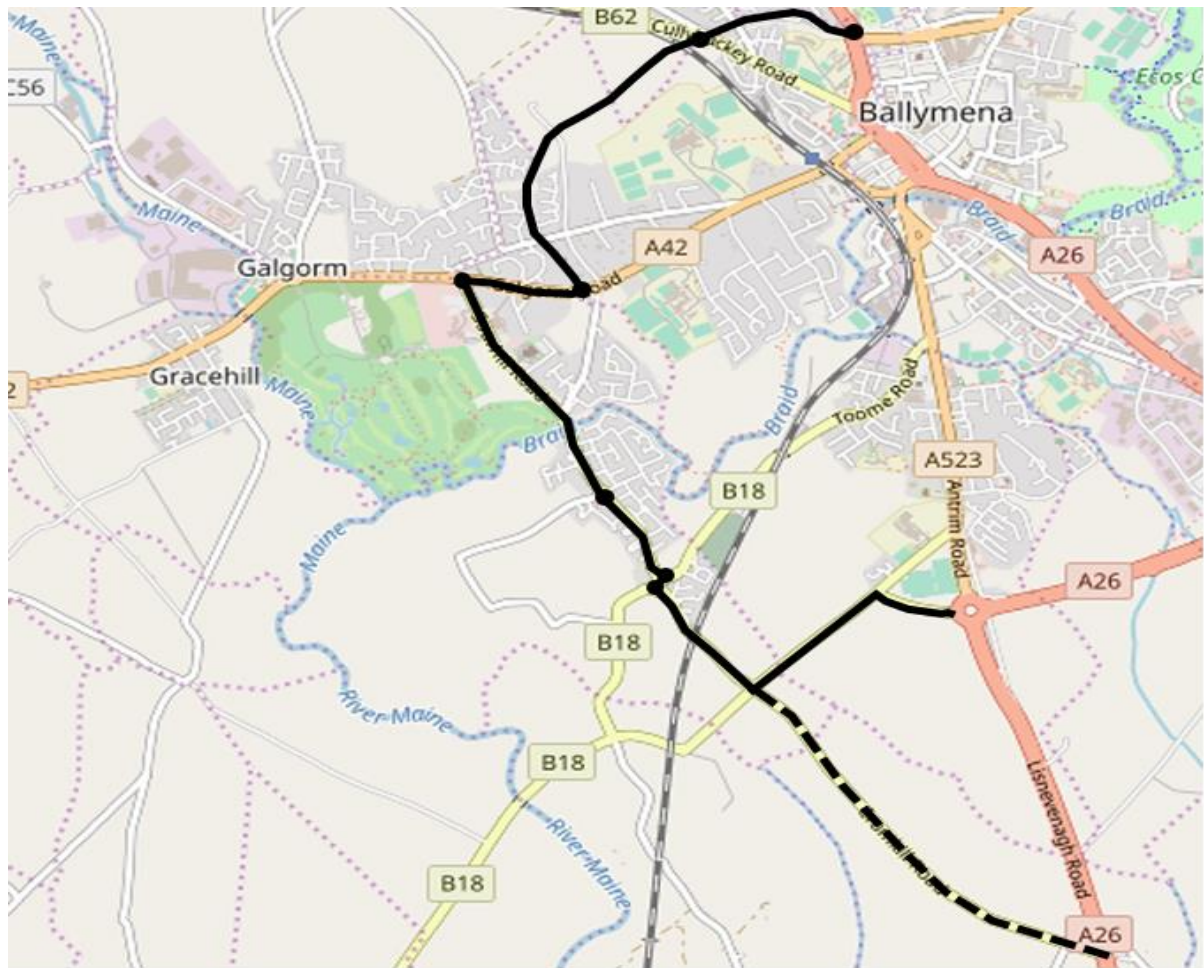












**SYSTRA provides advice on transport, to central, regional and local government, agencies, developers, operators and financiers.**

**A diverse group of results-oriented people, we are part of a strong team of professionals worldwide. Through client business planning, customer research and strategy development we create solutions that work for real people in the real world. For more information visit [www.systra.co.uk](http://www.systra.co.uk)**

**Birmingham – Newhall Street**

5th Floor, Lancaster House, Newhall St,  
Birmingham, B3 1NQ  
T: +44 (0)121 233 7680 F: +44 (0)121 233 7681

**Birmingham – Innovation Court**

Innovation Court, 121 Edmund Street, Birmingham B3 2HJ  
T: +44 (0)121 230 6010

**Bristol**

10 Victoria Street, Bristol, BS1 6BN  
T: +44 (0)117 922 9040

**Dublin**

2nd Floor, Riverview House, 21-23 City Quay  
Dublin 2, Ireland  
T: +353 (0) 1 905 3961

**Edinburgh – Thistle Street**

Prospect House, 5 Thistle Street, Edinburgh EH2 1DF  
United Kingdom  
T: +44 (0)131 460 1847

**Glasgow – St Vincent St**

Seventh Floor, 124 St Vincent Street  
Glasgow G2 5HF United Kingdom  
T: +44 (0)141 468 4205

**Leeds**

100 Wellington Street, Leeds, LS1 1BA  
T: +44 (0)113 397 9740 F: +44 (0)113 397 9741

**Liverpool**

Cotton Exchange, Bixteth Street, Liverpool, L3 9LQ  
T: +44 (0)151 230 1930

**London**

3<sup>rd</sup> Floor, 5 Old Bailey, London EC4M 7BA United Kingdom  
T: +44 (0)203 714 4400

**Manchester – 16<sup>th</sup> Floor, City Tower**

16th Floor, City Tower, Piccadilly Plaza  
Manchester M1 4BT United Kingdom  
T: +44 (0)161 831 5600

**Newcastle**

Floor B, South Corridor, Milburn House, Dean Street, Newcastle,  
NE1 1LE  
United Kingdom  
T: +44 (0)191 260 0135

**Perth**

13 Rose Terrace, Perth PH1 5HA  
T: +44 (0)1738 621 377 F: +44 (0)1738 632 887

**Reading**

Soane Point, 6-8 Market Place, Reading,  
Berkshire, RG1 2EG  
T: +44 (0)118 334 5510

**Woking**

Dukes Court, Duke Street  
Woking, Surrey GU21 5BH United Kingdom  
T: +44 (0)1483 728051 F: +44 (0)1483 755207

**Other locations:****France:**

Bordeaux, Lille, Lyon, Marseille, Paris

**Northern Europe:**

Astana, Copenhagen, Kiev, London, Moscow, Riga, Wroclaw

**Southern Europe & Mediterranean: Algiers, Baku, Bucharest,**

Madrid, Rabat, Rome, Sofia, Tunis

**Middle East:**

Cairo, Dubai, Riyadh

**Asia Pacific:**

Bangkok, Beijing, Brisbane, Delhi, Hanoi, Hong Kong, Manila,  
Seoul, Shanghai, Singapore, Shenzhen, Taipei

**Africa:**

Abidjan, Douala, Johannesburg, Kinshasa, Libreville, Nairobi

**Latin America:**

Lima, Mexico, Rio de Janeiro, Santiago, São Paulo

**North America:**

Little Falls, Los Angeles, Montreal, New-York, Philadelphia,  
Washington

The SYSTRA logo is displayed in a large, bold, red, sans-serif font. The letters are slightly stylized, with the 'Y' and 'S' having a modern, geometric feel. The logo is positioned at the bottom right of the page.

---

**Project:** Ballymena West

**Prepared by:** Kelvin Clarke **Date:** 9 December 2019

**Subject:** Mid and East Antrim Local Development Plan 2030 – Draft Plan Strategy

---

## 1 Introduction

Mott MacDonald has been commissioned to review the Mid and East Antrim Borough Council (MEABC) Draft Plan Strategy. The review follows on from work undertaken by SYSTRA Limited, “Ballymena North West Development Including New Relief Road – Transport Review”, approved by the author of this technical note. The earlier work was to consider the proposed development opportunity at Ballymena West and the role of the previously identified Ballymena South West Distributor Road in relation to both Ballymena town centre and the development.

Mott MacDonald has reviewed the Local Development Plan 2030 - Draft Plan Strategy, the Transport Strategy contained within that document, Technical Supplement 9 - Transportation and Appendix A - MEABC Draft Transport Study. The draft Transport Study had been prepared by the Department for Infrastructure (DfI) on behalf of MEABC.

It is recognised that the plan is being developed in two stages, with the Plan Strategy followed by the Local Policies Plan dealing with land use allocation. In relation to Transportation, a two-stage approach has also been adopted. The Transport Strategy is supported by the draft Local Transport Study and a Local Transport Plan will be prepared to support the Local Policies Plan.

This note focusses on the implications of the Transport Strategy and supporting draft Transport Study as it relates firstly to the Ballymena South West Distributor Road and a proposed development located adjacent to that road proposal.

## 2 Draft Plan Strategy

Section 5.7 of the draft Plan Strategy sets out the purpose of the Local Transport Strategy which is to provide clarity on the transport measures which DfI expect to deliver during the life of the plan and to ensure that the transport network and transport needs of the borough will be met during the plan period. Paragraph 5.7.2 of the plan also sets out the transport objectives which have been developed through the LTS and paragraph 5.7.3 the range of transport measures developed in the draft LTS.

Section 9 of the draft Plan Strategy sets out seven subject policies (TR1-TR7) to be taken on board in relation to new development.

We have reviewed the draft Plan Strategy and generally agree with the transport objectives and the way in which the transport measures are set out within the document. Of specific interest to this review is the response in bullet point 2 of paragraph 5.7.3 which recognises the need to “Consider new orbital capacity

This document is issued for the party which commissioned it and for specific purposes connected with the above-captioned project only. It should not be relied upon by any other party or used for any other purpose.

We accept no responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose, or containing any error or omission which is due to an error or omission in data supplied to us by other parties.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from us and from the party which commissioned it.

around key town centres in conjunction with public realm enhancements or improvements to active travel modes. Capacity schemes to be developer led”.

However, as will be explored later, given the lack of detailed assessment undertaken in the draft LTS it is unclear how the performance of the existing road network has been considered in the conclusion that any “capacity schemes” will require to be “developer led”.

We have similarly reviewed the policy aims and seven subject policies which are generally an interpretation of previous PPS policies.

### **3 Draft Local Transport Strategy**

The draft LTS is recognised to be a sub-document of the Belfast Metropolitan Transport Plan and will be subject to review and possible change as the BMTP is finalised.

We note the “outcome approach” adopted in the development of the draft LTS and agree that it is important that the transportation approach in Ballymena delivers a transport strategy which looks forward towards a sustainable transport future for the town.

However, adopting an “outcome approach” still requires an appropriate level of evidence to ensure that the emerging objectives and strategies are appropriate to deliver a robust transport strategy.

We consider that there is a lack of evidence relating to the operation of the existing road network in the town, particularly the section of the road network around the North Road / Galgorm Road / Bridge Street / Larne Road junctions serving the town, which are recognised at peak times to operate at or beyond capacity, with significant queues and delays.

The LTS proposition of introducing improved priority and infrastructure for walk, cycle and public transport along the Galgorm Road corridor would reduce the priority of moving vehicles which could exacerbate existing traffic problems.

We consider that one of the main functions of the proposed Ballymena West Link was to address those existing traffic issues with the opportunity to support sustainable transport measures and yet whether the West Link should be included in the plan has not been considered.

Bullet point 2 of paragraph 5.7.3 of the draft Policy Strategy recognises the opportunity for new orbital routes around town centres but concludes, without evidence, that any capacity improvements would require to be delivered by developers.

This approach appears to be contrary to draft policy TR3 which recognises that with regard to new transport schemes, “The developer contribution in each instance will be commensurate with the scale of the development proposal and on the extent to which the development itself relies on the transport scheme”.

The position taken in draft policy TR3 is also silent on the issue of strategic or non-strategic road schemes, appearing to recognise that there could be circumstances where there is a public value of an investment in new infrastructure.

We consider that without supporting evidence, the draft LTS should better reflect the position taken in plan policy TR3.

We consider that it would have been appropriate for the draft Policy Strategy to seek to identify road schemes which deliver public value and contribute to the delivery of the sustainable transport approach in the plan to be identified and included at this stage in the development of the plan.



## 4 Ballymena North West Development Including New Relief Road – Transport Review

The report prepared by SYSTRA Limited (Appendix A) was prepared on behalf of Beechview Developments Limited. The transport review was based on the evidence available from previous transport studies in Ballymena, including a traffic model of the town which considered the contribution which the Ballymena West Link and South West Distributor Roads would make to improving the operation of Ballymena town centre.

The report referred to the existing Ballymena Local Plan and the South West Distributor and West Link road scheme included in that plan, which passed through the proposed Ballymena West development site. The report recognised that the scheme had been in the Area Plan for decades, but with the Local Development Plan under review, recognised the opportunity for the road scheme to be reassessed. The expectation being that a Local Transport Study (LTS), as referred to in the Strategic Planning Policy Statement (SPPS) would be undertaken by DfI.

The SYSTRA report recognised that the traffic model data being used to inform the review was becoming dated and recommended that in the development of the emerging Local Development Plan, an appropriate assessment of the South West Distributor and West Link be undertaken to identify the benefits in Ballymena town centre including reduced traffic congestion, with, undoubtedly, associated environmental benefits.

This approach would be consistent with the response to the Preferred Options Paper (POP) 22, where the consensus was for non-strategic road schemes to be assessed before being included in the plan. This included DfI.

While the report was focussed on the opportunity for new development to be provided in association with a section of the West Link, the conclusions noted that *“the construction of this new relief road will provide significant traffic relief to the A26 and Galgorm Road, improve connectivity and accessibility in relation to existing residential areas and the Grammar and Academy while also providing improved permeability for sustainable travel modes”*.

The report also recognised that, *“as indicated in SPPS, that there will be a responsibility on the developer of the Ballymena North West site to contribute to the provision of the new relief road. It is also recognised that the significant benefits which the new relief road would provide to the wider community would generate a need for DfI to seek to contribute to such a scheme”*.

Finally, the report recommended that in support of the emerging Local Development Plan a LTS should be prepared which considered the provision of the new relief road.

We consider that delaying the detailed assessment of the specific transport measures required to meet the transport needs of Ballymena to a later stage in the development of the local development plan ignores the contribution which this element of infrastructure makes.

## 5 Summary

We have reviewed the draft Policy Strategy and supporting Transportation documents.

We welcome that DfI recognise that the work undertaken to date is a first step to preparing a Local Transport Plan. We also agree in general terms with the “outcomes” based approach being adopted, the draft transport objectives and transport measures. However, we consider that the approach to addressing the requirement for non-strategic road schemes to support the Policy Strategy is not based on appropriate evidence.

Policy TR3 recognises that developer contributions towards new transport schemes would be commensurate on the extent to which the development itself relies on the transport scheme. However, this is not reflected in the Transportation Supplement or associated Appendix, which indicates that any capacity schemes will be delivered by developers.

The lack of evidence and the lack of assessment presented in the LTS of the transport challenges which Ballymena faces, results in the LTS not grasping the contribution of the Ballymena West Link in the future development of the town and the important contribution it could make in the delivery and prioritisation of the identified sustainable transport measures.

It is recognised that the purpose of the Local Transport Strategy is to provide clarity on the transport measures which DfI expects to deliver during the life of the plan and to ensure that the transport network and transport needs of the borough will be met during the plan period.

In relation to measures which DfI expects to deliver, this is only addressed through the assumption that any capacity improvement measures will be developer funded. Given a lack of evidence and assessment the second matter relating to the transport needs of the borough has not been addressed, particularly in relation to the contribution which non-strategic road schemes make to delivering the wider transport strategy.

We consider that it would have been appropriate for the draft Policy Strategy to seek to identify where road schemes which deliver public value and contribute to the delivery of the sustainable transport approach to be identified and included at this stage in the development of the plan.