

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

MR

First Name **(Required)**

DAVID

Last Name **(Required)**

DONALDSON

Email

david@donaldsonplanning.com

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)

SGS3 & SGS5 ALLOCATIONS TO WHITEHEAD ARE SUPPORTED. SEE PAPER ATTACHEI

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

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.

MEA-DPS-013

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.

A large, empty rounded rectangular box with a thin blue border, intended for providing details of changes to the draft Plan Strategy. The box is currently blank.

MID AND EAST ANTRIM BOROUGH COUNCIL

RESPONSE TO DRAFT LOCAL PLAN STRATEGY



SUBJECT: WHITEHEAD



December 2019

1.0 INTRODUCTION

1.1 This submission has been prepared in response to the draft MEA Plan Strategy, published in September 2019.

1.2 The response has been formulated in relation to the potential development of Whitehead.

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;
- the housing allocation is discussed in section 5.0; and
- conclusions are in section 6.0.

2.0 RATIONALE FOR SUBMISSION TO PLAN STRATEGY

2.1 This submission has been made in support of the potential development of lands to the north of Islandmagee Road, Whitehead.



Site Location

- 2.2 It is recognised that the Plan Strategy stage is not about identification of particular lands. However the Plan Strategy is important to the context of the future development of Whitehead.
- 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.
- 3.4 In this case it is considered that the draft Plan's overall objectives are generally soundly based. Whilst this Practice has concerns that the plan period to 2030 is inconsistent with DPPN01, and that the overall Housing Allocation process is flawed, we note and support the fact that the Plan Strategy identifies a significant shortage of housing land in Whitehead.
- 4.0 HOUSING ALLOCATION
- 4.1 It is accepted that the Council must have regard to the Housing Growth Indicators (HGIs) published by Department of Infrastructure. But it is not bound by these figures.
- 4.2 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 Plan allocation which is significantly higher than the HGI figure. Indeed Belfast's Draft Plan Strategy presents much more ambitious housing growth targets than the HGI.
- 4.3 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, as the two are not the same thing.

- 4.4 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.
- 4.5 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. Effectively, for the HGI figure to be delivered by 2030, full planning permissions will need to be in place by around 2025. A Plan which allocates only enough land to equate to the HGI figure will be 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 completely at odds with the SPPS requirement (para 6.140) for Councils to maintain a 5 year housing land supply within the District at all times.

Whitehead Allocation

- 4.6 As noted above, the draft Strategy utilises the HGI figures for 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.
- 4.7 The proposed allocation to Whitehead (Table A3) over the period of 2018-2030 is 218 units. This figure has been adjusted downwards from a proportionate household calculation, following application of the RDS Evaluation Framework.
- 4.8 If the appropriate 5 year addition to ensure continuity of supply and accordance with DPPN01 is added, the allocation figure should increase by 90 units to about 308 units. This would require at least 12 hectares of land (@25dph).
- 4.9 Whitehead has proven to be a popular housing location, and significantly, Table A3 confirms that there are now only 11 live residential planning permissions. The town is considered to be 207 houses short of its proposed allocation. This is the largest deficit of any settlement within the Borough.

SHA

Table A3 Housing Allocation 2018-2030 and Live Residential Planning Permission in Settlements at April 2018

Settlement	Housing Allocation 2018-2030 after HEF adjustment (2012-2030 HGI minus Completions 2012-2018)	Live residential planning permissions (units)	Difference in notional allocation figure and live planning permissions (units)
Main Towns			
Ballymena	991	996	Exceeds allocation by 5
Carrickfergus	1,239	1,222	17 short of allocation
Larne	879	845	34 short of allocation
Main Town total	3,109	3,063	46 short of allocation
Small Towns			
Greenisland	96	167	Exceeds allocation by 71
Whitehead	218	11	207 short of allocation
Ahoghill	94	73	21 short of allocation
Broughshane	67	69	Exceeds allocation by 2
Cullybackey	110	113	Exceeds allocation by 3
Small Towns total	584	433	151 short of allocation

- 4.10 Even when the potential for windfall and urban capacity units are factored in (Table A5), the town is still well short of its housing allocation requirement. Accordingly, more land will need to be identified to meet this shortfall.
- 4.11 Policy SGS5 on Management of Housing Supply indicates that for the small towns, where there is a deficit, additional land will be zoned for housing if it is sustainable to do so. This may include extending settlement limits. In selecting land to be zoned for housing, priority will be given to sites which are accessible to community facilities and services and public transport, can avail of existing infrastructure, avoid flood risk and do not adversely impact on townscape character or natural or built heritage. This is considered appropriate for Whitehead.
- 4.12 The lands at Islandmagee Road are free from any significant constraints. They meet all of the SGS5 requirements. They are easily accessible to a main road; they are beside the new health centre; they are not in an area of flood risk; and they occupy a distinct 'notch' between a golf course and other housing.

