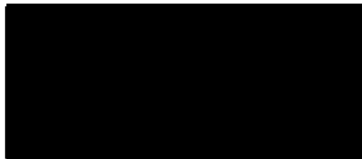




Dear Sir/Madam

In line with the public consultation period. Submitted attached document previously submitted in support of land at Drumahoe Road, Millbrook being zoned for private development in the area plan.

Regards



CLYDE SHANKS

Planning Development

5 Oxford Street, Belfast BT1 3LA
t | 028 9043 4393
e | enquiries@clydeshanks.com
clydeshanks.com

**FARRANS CONSTRUCTION
LTD**

**LANDS AT DRUMAHOE ROAD,
LARNE**

PLANNING APPRAISAL

A. INTRODUCTION

1. Clyde Shanks Ltd has been instructed by Farrans Construction to carry out a planning appraisal regarding lands at Drumahoe Road, Larne. This appraisal will consider the subject lands in the context of the emerging Local Development Plan (LDP) and in particular the Preferred Options Paper (POP) recently published by Mid and East Antrim Borough Council (MEA).
2. This appraisal has been informed by undertaking the following tasks:
 - Review of adopted Larne Area Plan (LAP) to understand current site context;
 - Review of planning applications for site and surrounding area;
 - A site visit;
 - Review of aerial photography;
 - Review of Discussion Papers prepared by the Council relating to the emerging Plan; and
 - Review of the recently released POP.

B. SITE AND SURROUNDINGS

3. The site currently comprises an agricultural field adjacent to Drumahoe Road on the outskirts of Larne. The field is bound on all sides by hedging and trees. The site banks up from Drumahoe Road and rises gradually to the north and west, with the surrounding land rising generally from south to north. In terms of surrounding development, there is existing housing to the south east and east, industry to the north east and agricultural land to the north west and west.



Figure 1: Site location

C. PLANNING HISTORY

Site

- No available planning history.

Surroundings

- No relevant planning history in surrounding area.

D. POLICY CONTEXT

Local

4. The Larne Area Plan (LAP) 1998 - 2010 identifies that the site is located outside the settlement development limit (SDL) of Larne, but immediately adjacent to it on three sides. Larne is identified as the main town for what was the Larne Borough Council area and includes the main service functions, such as shops and Council facilities for the Council area.
5. The lands to the south and south west of the site are zoned for industrial purposes, whilst a small area of land to the south east is zoned for housing. The lands to the east are in part established residential development and in part zoned industrial land. The lands to the north west are outside the SDL.

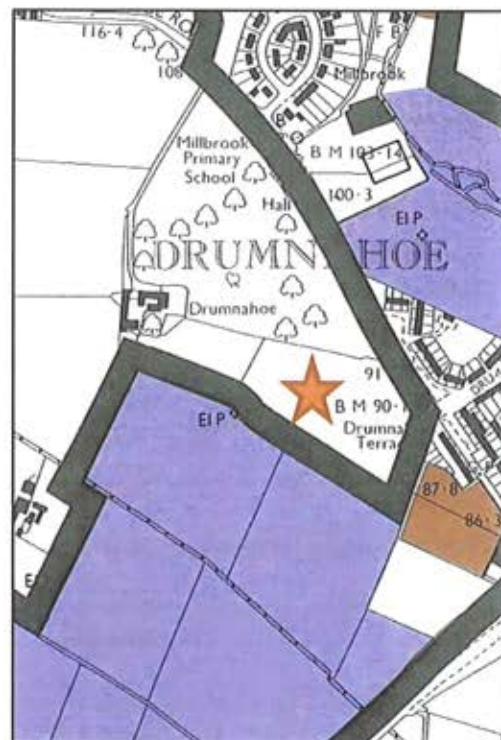


Figure 2: Larne Area Plan extract

CLYDE SHANKS

E. ASSESSMENT

HOUSING ALLOCATION PAPER

6. The MEA Housing Allocation Paper (Addendum) April 2016 set out the Council's initial analysis of the Department for Regional Development's Housing Growth Indicators (HGIs). The HGIs predict how many dwellings will be required within each Council area by reviewing historical construction rates in previous years. These are used by Councils to estimate how many additional houses will be required within a Council area over the length of time a new LDP is to cover.
7. The MEA Housing Allocation Paper took the HGI figure for the Council area and altered it to reflect the proposed Plan period of 2012 to 2030. This resulted in the anticipated need for a total of 7,477 dwellings for the whole Borough up until 2030.
8. To corroborate this figure, the Council studied statistics from NISRA and estimated that would be an increase of only 3,161 households within MEA over the Plan period (ie some 42% of the HGI figure). On this basis the Council took the view that there would not be strong grounds in planning for housing provision in excess of the HGI figure of 7,477 units. The Paper also noted that in terms of supply, there was no shortage of land currently committed for housing development across the Borough.
9. Four options were put forward by the Council under this Paper to be considered by them for the distribution of housing growth in the new Council area, while also taking account of the new settlement hierarchy. Specifically the results for Larne are noted below and overleaf in each option:

Option 1 - (Status quo using 2011 household percentages)

Settlement	Completed (1-4-2012 & 31-3-2016)	Committed Units still to be developed & Residual Zoning (at 31 Mar 2016)	No.of House- holds	% share of HGI based on % share of households	HGI allocation share of household	Need for Additional Housing (Units)
Larne	178	2,862	8,152	15.0%	1,122	NO- 1,918 surplus

Option 2 - (Increase villages and small settlements at the expense of open countryside)

Settlement	% share of HGI	HGI Allocation	Need for Additional Housing (Units)
Larne	19.51%	1,459	NO- 1,581 surplus

Option 3 - (Option to increase ability to meet 60% brownfield target in settlements over 5000)

Settlement	% share of HGI	HGI Allocation	Need for Additional Housing (Units)
Larne	23.3%	1,745	NO- 1,296 surplus

10. The three options outlined above confirm that between 58 and 70% of new housing provision within the new plan period would be located in the three Main Towns. Reviewing the individual settlements, Larne is shown within the Paper to have a significant surplus of housing land supply.

Option 4 - (To meet the anticipated demand for housing in the open countryside based on past trends)

Settlement	% share of HGI	HGI allocation	Need for additional housing (Units)
Larne	19.5%	1,458	NO- 1,582 surplus

11. The Paper concludes by explaining that the next stage is to *"identify the corporate view of the Council in regard to the preferred option to be advanced in the Preferred Options Paper."*

PREFERRED OPTIONS PAPER

Housing Growth

12. The POP is the first public consultation document to be issue as part of the LDP preparation process. It presents a range of strategic planning issues that have been identified in the Mid and East Antrim area. The main purpose of the POP is to stimulate public debate on these strategic planning issues and help inform the next stage of Plan Strategy. For most of these issues, the POP will identify a range of alternative options or approaches, as well as setting out the preferred option and the rationale for this.
13. The POP follows on from the Housing Allocation Paper in considering and applying the HGI figure. However, the POP assessment is based on a shorter Plan period of 2015 to 2030, given the passage of time since the preparation of the Housing Allocation Paper. This shorter period revised the HGI figure down to 6,230 dwellings.
14. The POP acknowledges that the HGI figure is significantly less than the current realistic potential from undeveloped zoned housing land and committed housing sites (ie. those with live planning permissions or where development has commenced), which totals 8,390 units. This assessment is based on reviewing the existing LDP for each of the old Council areas that now make up MEABC, ie Ballymena, Carrickfergus and Larne. This figure is 35% higher than the HGI figure for the Plan period.

15. Despite acknowledging this, the Council does not settle on a specific housing growth figure for the Plan period. However, within their preferred option for allocating housing growth (Option 4a, page 67) the Council uses the HGI figure when identifying the number of dwellings to be allocated to each tier of the settlement hierarchy.
16. In our opinion applying the basic HGI figure is too pessimistic a position for the Council to adopt as this figure is predominantly based on housing completions during the recent recession. It is unlikely that this low ebb in housing completions will be replicated in the future and using this figure alone risks the Borough being under-provided for housing land towards the end of the Plan period.

Housing Allocation

17. In relation to how housing growth is to be distributed across all the settlements within the borough, the POP sets out that *"at this stage in the plan process, it is not considered necessary to set out the precise allocation for any given settlement but it is reasonable to consider how housing should be apportioned across the various tiers of settlements."* The POP further outlines that *"the precise number of dwellings that will be allocated to each settlement will be set out in the draft Plan Strategy, taking account of the size of the settlement, the availability of services and facilities and its environmental capacity for development."*
18. Within the POP it is identified that the Council's preferred option (identified as 4a) is seen as the most supportive of the Council's proposed Spatial Growth Strategy. Option (4a) aims to *"maintain the status quo in terms of housing allocation based on the proportion of households living in the main towns and small towns at the time of the 2011 Census."*
19. It is proposed to allocate 58.5% of housing growth to the three main towns, which would equate to a pro rata figure of 19.5% for Larne. The final figure may be less as Larne is the smallest of the three main towns and has proportionally the smallest number of households of the three. The 58.5% figure would result in an allocation of 3,645 houses between the main towns based on the HGI figure, and dividing this in three would allocate 1,215 dwellings to Larne.

Oversupply of housing land

20. The figures provided by the Council in respect of Larne suggest that there is currently 63 hectares of zoned housing land remaining in Larne based on the Larne Area Plan zonings, which could accommodate approximately 1,760 dwellings. When other housing potential is accounted for, including committed housing developments and unzoned 'whitelands' sites there is capacity for 2,869 dwellings within Larne as shown in the Larne Area Plan.
21. This is clearly substantially more than is required to meet growth to the end of the Plan period. The Council has remained silent in the POP on how they propose to deal with this significant level of surplus housing. However, in order to understand what lands should and should not be zoned for housing within the new LDP the Council will have to undertake a detailed review of all current zoned and unzoned sites

CLYDE SHANKS

within the settlement limit and potentially consider de-zoning lands currently within the settlement limit of Larne.

22. In our view this assessment should also include lands currently adjacent to but outside the settlement limit where it could be argued that these would consolidate the existing urban form of the town better than existing undeveloped lands within the settlement limit.
23. In addition, consideration should be given to the prospects of lands being developed during the Plan period where they have not come forward for development within the lifetime of the Larne Area Plan (adopted 19 years ago in March 1998). Where the prospects are considered remote, weight should be attached to lands outside the settlement limits where land owners have clearly identified to the Council that they are keen to bring forward housing during the Plan period.

Site Specifics

24. The Council has stated that they will not consider site specific representations as part of the POP consultation. Therefore any representation will have to deal directly with the strategic matters covered within the POP.
25. Whilst the site appears to sit into the settlement and form part of a rounding-off opportunity when considered in the context of the Larne Area Plan, with development or zoned land on three sides, in reality there is only built development (housing) immediately adjacent to the south east. The development to the east and north is separated from the site by Drumahoe Road and the lands to the south west, whilst zoned for industry, have not been developed and have no live planning permissions or applications for their development.
26. The strength of the argument for the site to consolidate the settlement limit of Larne rests on the retention of the industrial zoning to the south west. Providing that this is retained, at least in part, then this argument can be advanced at the appropriate stage of the LDP process.

Response to POP

27. MEA have confirmed that they will not accept site-specific representations at this time. On this basis the arguments to be advanced to the Council should relate to the strategic issues of housing growth and housing allocation.
28. We would recommend that a representation is made to the Council outlining our opinion that the Council should not slavishly adhere to the HGI figure, but rather increase this to reflect the likelihood that housing growth in the years up to 2030 will exceed that of the recent past and that a figure in excess of the HGI should be used when determining how many dwellings will be required across the whole Borough.
29. In relation to Larne, we would recommend that the Council is urged to take a detailed review of the settlement limits of the town and not restrict consideration to existing undeveloped zoned and unzoned

lands within the settlement limit. It is clear that there are sites better located to deliver a more consolidated urban form, including the subject site. In addition, the fact that some zoned and unzoned sites have not come forward for development during the lifetime of the Larne Area Plan (adopted in March 1998) suggests that there is no prospect of them being developed and they should be removed from the settlement limit in favour of sites where there is a greater prospect.

F. CONCLUSION

30. The site is located outside but adjacent to the settlement limit of Larne as shown in the Larne Area Plan. Within the Plan it is bound on three sides by the settlement limit. The site is currently in agricultural use but has no environmental designations associated with it.
31. The published Housing Allocation Paper and MEA POP set out that over the new Plan period out to 2030 there is a significant surplus of housing land, including in Larne, purely based on the remaining zoned housing lands, unzoned 'whitelands' and committed developments.
32. The Housing Growth Indicator for the Borough prepared by the Department for Regional Development states that there is a predicted need over the period 2015 to 2030 of 6,230 dwellings. The POP applies this figure exactly in its housing growth proposal and we would argue that this is too pessimistic given that this figure is based primarily on housing completions during the recent recession.
33. The Council will have to undertake a detailed review of all current zoned and unzoned sites within the settlement limit of Larne and potentially consider de-zoning lands currently within the settlement limit given the significant oversupply.
34. In our opinion this review should also include lands currently adjacent to but outside the settlement limit where it could be argued that these would consolidate the existing urban form of the town better than existing undeveloped lands within the settlement limit.
35. In addition, consideration should be given to the likelihood of lands being developed during the Plan period when deciding which lands to include within the settlement limit of Larne. Where the prospects are considered remote, weight should be attached to lands outside the settlement limits where land owners have clearly identified to the Council that they are keen to develop housing during the Plan period.
36. MEA have confirmed that they will not accept site-specific representations at this time. On this basis we recommend submitting a representation to the POP employing the strategic arguments above relating to housing growth and allocation.