

Mid and East Antrim Borough Council
Development Plan Team
Planning Office
County Hall
182 Galgorm Road
Ballymena
BT42 1QF

Dear Sir/ Madam,

Date: 11th December 2019

Re: Mr [REDACTED] [REDACTED] Response to Mid East Antrim Council Local Development Plan 2030- Draft Plan Strategy

Your Ref: -
Our ref: 2019542

We write on behalf of our client, [REDACTED] & to make a submission in respect of the Mid & East Antrim Borough Council ("MEA") Local Development Plan ("LDC") Draft Plan Strategy ("DPS").

The submission considers the policies within the DPS, relevant to our client, having regard to the necessary soundness tests referenced in the Council's *document 'Guidance Notes on the Tests of Soundness and Submitting a Representation'* and Development Plan Advice Note 6. Our client has a particular interest in the Spatial Growth Strategy and Settlement hierarchy and the allocations for both housing and industry, specifically in respect of the allocation for the town of Larne and settlement of Glenoe. In addition to this we draw your attention to specific lands at Ballywillan Road, Glenoe, which we have identified as being suitable for inclusion within the settlement development limit of Glenoe.

The Council will be aware that we had previously made submissions to the Preferred Options Paper ("POP") on behalf of our client [REDACTED] and we enclose a copy of that submission for ease of reference hereto. The representations made therein remain relevant to the Draft Plan Strategy. In summary that representation sought:

- Glenoe should be reclassified as a village owing to the level of facilities and infrastructure
- The arbitrary allocation of 2016 HGI Figures is inappropriate
- There needs to be allowance for growth in Glenoe in order to sustain the community

Our client welcomes the Plan Vision and agrees that the LDP should be shaped "by high quality sustainable and connected places for people to live, work, enjoy, invest and visit". Our client welcomes the MEA's intention to deliver "sufficient housing" (paragraph 4.1.3), "instigate economic recovery and greater diversification through a number of mechanisms and initiatives" and seek to meet land requirements for the necessary infrastructure to facilitate new economic development (paragraph 4.1.5) and "maintain the identities of [the] towns and villages" (paragraph 4.1.4).

Our client is therefore particularly supportive of the following Strategic Objectives;

- *Economic Objective*
 - a) *To provide a sufficient supply and choice of sites for business and employment uses so as to assist in promoting sustainable economic*

growth in Mid and East Antrim and in meeting the location needs of particular sectors, including new and emerging sectors

- *Social Objective*
 - *a) To support the role of mains towns, small towns, villages and small settlements in accordance with the LDP Spatial Growth..*
 - *c) To provide a sufficient supply of land for new mixed tenure housing in convenient locations to meet the anticipated housing need...*
 - *d) To deliver quality residential environments (including associated open space and linkages to green infrastructure networks)*
 - *f) To support, and where possible enhance the recreation and leisure offer within Mid and East Antrim...*

In general the DPS Spatial Growth Strategy appears to be soundly based to focus growth in the main hubs of Ballymena, Carrickfergus and Larne. However our client does have concerns with soundness of the Spatial Growth Strategies in respect of the settlement hierarchy and corresponding allocation and for Glenoe and its potential impact for sustainable growth;

- *SGS2 Settlement Hierarchy*
- *SGS3 Strategic Allocation of Housing to Settlements*

SGS 2 Settlement Hierarchy

Our client is concerned about the allocation of Glenoe as a 'small settlement' and its consequence for growth. As previously submitted by [REDACTED] questions whether the status of Glenoe as a small settlement should be amended to a village. Glenoe exhibits many of the characteristics of a village, including;

- A Church- St Columba's Church of Ireland
- 3 No. village halls; Orange Hall, St Columba's Church Hall (Carneal Road) & Mission Hall (Ballywillan Road)
- A Local shop (McDowell's shop at Waterfall Road)
- Employment provision at McDowell's Shop and hard ware and Gleno Dairy
- Workshop Business Units within the centre of the settlement

Despite a smaller population the settlement of Glenoe would have a greater number of facilities compared to the nearby village of Glyn and Ballystrudder.

[REDACTED] is in agreement that the future growth of the district should be focused in the main hubs, followed by local towns, villages and that small settlements should be supported to provided sufficient growth for the sustenance of the local rural communities.

As Larne lacks any supporting small towns, as reflected in the Hierarchy the role of these villages is vital to support the main hub of Larne. Glenoe provides a supporting role both to Larne and Carrickferus and ought to be redesigned as a 'village'. In the absence of the designation of supporting small towns around Larne the deficit in growth ought to re-balanced in the favour of Larne and these villages, by providing additional opportunities for growth.

The following comments are made in respect to Soundness Test:

➤ **Soundness:**

Soundness Test C1 – Did the Council take account of the RDS

Soundness Test C3 – Did the council take account of policy and guidance issued by the Department

Object on the basis that this policy fails to meet Test C1 & C3 in that SGS2 does not take account of policy and guidance issued by the department in the RDS to establish the function and role of Glenoe as a village.

Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow

Object on the basis that this policy fails to meet Test CE1 in that SGS2 fails to consider how the growth of Larne as a hub town and gateway port is supported in the absence of the designation of supporting towns and whether the limited allocation of Glenoe as a village would have provided a supporting role. It also fails to acknowledge the role Glenoe currently provides insofar as it operates on a village scale, evidenced by the range of services and facilities.

➤ **Remedy**

The Plan needs to be updated to designate Glenoe as a village. It should consider the impact of the isolating setting of Larne without small towns and limited number of villages to support its sustainable growth. This should provide an evidence base considering the impact and potential remedy to tie in more flexibility. Suggest the designation of Glenoe to a village status would provide satellite settlements in the absence of small towns.

SGS 3 Strategic Allocation of Housing to Settlements

The proposed allocation of a mere 4614 housing allocation is one of the lowest aspirations for growth across all Council's sectors and lack flexibility and is likely to compromise the plans vision for growth. The reliance on the 2016 Housing Growth Indicator (HGI) figure of 5400 for the region is restrictive and lacks aspirations growth for the borough and instead the application of this figure, pro-rata to 2018-2030 fails to allow for future increase in growth projections.

In the preferred Options Paper referred to the first Housing Growth Indicator and the 2016 HGI figure. It commented that this was not a cap or target. At Paragraph 5.3.5 of SGS3 it notes the HGI is an estimate, yet it continues to state that "*best available evidence, largely related to anticipated household formation and finds no sound reason to depart from it*". This infers that contrary to the assertion in the POP the DPS is applying the 2016 HGI as an arbitrary cap.

It is argued this is fundamentally flawed and fails to allow for the unique time from 2008 to 2016 upon which the lowered HGI figure pertains. That period followed one of the most significant economic crashes in recent history and forced housing growth to abnormally low levels. This in turn has skewed the annual growth figures and resulted in low level growth forecasts. However this HGI figure fails to take account of the higher number of house completions and household increase pre-2008 and the rising household figures post 2016. The DPS fails to provide an in depth analysis and review of the 2016 HGI figures and instead relies too heavily on these unquestioned 2016 HGI figures. Application of this HGI pro-rated for 2018-2030 fails to tie in sufficient flexibility and instead should be increased to reflect pre-recession build out rates.

Our client is particularly concerned with the housing percentage allocation for Glenoe. As is proposed 'small settlement' status this allocates a mere 142 across all small settlement in the borough. But this figure is also skewed by the committed approvals for some 72 housing units across 4 settlements, leaving a residual allocation of 70 units for the small settlements. This correlates to less than 5 units (if applied by average share) for the plan period and is simply not sustainable.

██████████ believes this is contrary to the SGS1 Spatial Growth Strategy to "*sustain rural communities living in and around villages and small settlements*". This nominal

allocation will not sustain the rural community over the plan period, rather it will force next generation out of Glenoe to the detriment to the settlements role.

By comparison the allocation for the open countryside is more than double that of the small settlements, with some 358 units projected in the plan period.

██████████ is concerned that the Allocation, as set out in Appendix A (Table A3), will enable a greater growth in the countryside at the detriment to the sustainability of local villages. The Countryside Allocation of 358 units is significant, accounting for circa 12% of the total growth and is disproportionate to the population demographic. Sequentially, after the main hub town and smaller towns, the villages and small settlements ought to be allocated to provide the main growth to service the surrounding rural hinterland and accommodate the main rural population growth. This is promoted in the RDS and therefore ought to be reflected in the DPS.

The allocation of almost 12% growth across the countryside, compared to less than 6% in the small settlements is disproportionate and fails to properly take account of the role of villages/ small settlements as being service centres for the rural population. This allocation will create tensions in delivering 'sustainable development' and will weaken the role of villages/ small settlements in the rural area

The strategic objective to sustain rural communities villages and small settlement is arguably compromised through this allocation, by allowing disproportionate growth in the countryside. We argue this will undermine the role of the village/ small settlement and weaken the focused growth strategy in urban areas. Rural population growth ought to be focused in the settlements rather than open countryside.

As conferred by the Regional Development Strategy 2035 (RDS), the role of the LDP is to "identify and consolidate the role and function of settlements within the cluster". The housing allocation therefore is integral to ensure that sufficient land is included within the Settlement Development Limits to maintain the function of villages and small settlements as the main service centres for the surrounding rural hinterland.

This is further compounded in the Larne district, where there are no small towns to direct growth, thus the role of villages and small settlement provide a more acute role as service and housing centre for the rural community.

Specifically ██████████ argues that in addition to re-designating **Glenoe** as a 'village', the allocation ought to be increased to reflect its role:

- It benefits from a central location serving a wide surrounding rural hinterland between Larne and Carrickfergus
- It has a range of services; 2 no. shops (butchers, hardware, general store), restaurant and child care facilities.
- It has a range of community uses; Community/ Orange Hall, Church Hall and Community Group.
- It has a strong amenity value, benefiting from a local river walkway and waterfall attraction.

Therefore in light of this our client has concerns as to whether the Housing Allocation distribution does fully reflect the Regional Development Strategy and on this basis our client reluctantly objects to the following policies and submits they do not meet the tests for soundness:

The following comments are made in respect to Soundness Test:

➤ **Soundness:**

Soundness Test C1 – Did the Council take account of the RDS

Soundness Test C3 – Did the council take account of policy and guidance issued by the Department

Object on the basis that this policy fails to meet Test C1 & C3 in that SGS3 does not take account of policy and guidance issued by the department in the RDS to sequentially focus growth in main towns and then villages.

Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow

Object on the basis that this policy fails to meet Test CE1 in that SGS3 fails to consider how the growth of Larne as a hub town and gateway port is supported in the absence of the designation of supporting towns. The Policies fails to demonstrate that consideration has been given to the role Glenoe plays in supporting Larne and the rural hinterland.

Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances

Object on the basis that this policy fails to meet Test CE2 & CE4 in that the allocation is disproportionate to the strategic growth plan and population demographics. The small settlement allocations are not realistic or appropriate and have not considered the relevant alternatives. The limited allocation for the small settlements is insufficiently flexible to meet future growth needs to deal with changing circumstances.

The identified housing growth figure of 4,614 (of which 879 allocated to Larne and circa < 5 units for Glenoe) dwellings does not allow for the absence of supporting small towns to feed in to labour force, commuter households and a probable delay in the adoption of the Plan which could hinder the Council's ability to review and amend the Plan prior to 2030. This is particularly relevant on the basis of increasing build rates in recent years.

➤ **Remedy**

The Plan needs to be updated to increase the Allocation within the Glenoe, to focus growth to service the surrounding rural area (rather than dilute settlement hierarchy through disproportionate high level of growth in small settlement & countryside. An uplift in allocation would also reflect its role as a village and supporting settlement to the main hub town of Larne, to allow sufficient flexibility to respond to increase householder growth arising from increased employments, its role as a commuter town and to off-set the absence to supporting small towns.

The settlement limits should include a modest rounding off to include sufficient lands to accommodating housing and associated development during the plan period.

Proposed Site for Inclusion in Settlement Limit of Glenoe

The lands delineated in Figure 1 below are located at west of Ballywillan Road, Glenoe. The site comprises undeveloped land, located within the existing countryside but not subject to any protective or restrictive designations.

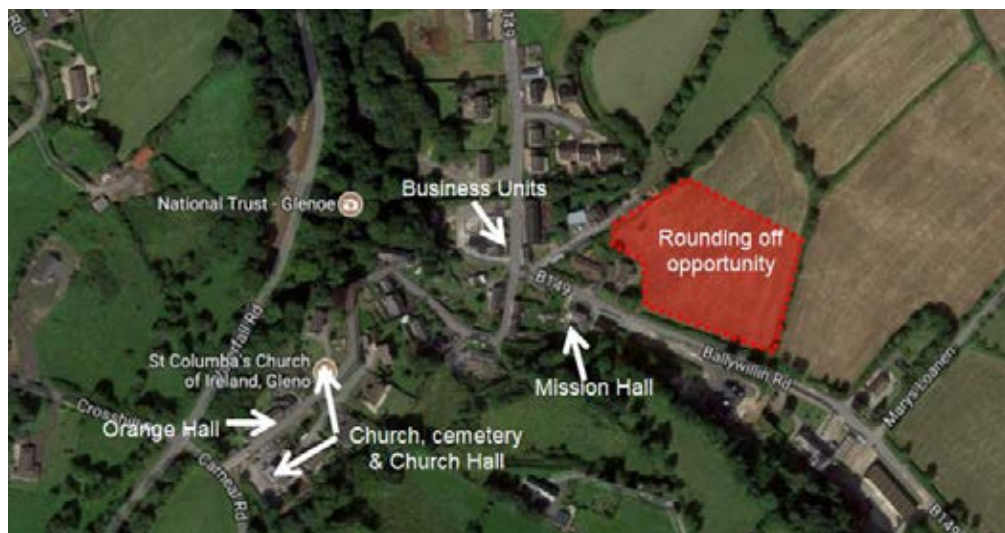


Figure 1 Overview of Lands available for development

The site provides a potential rounding off opportunity for Glencoe and is particularly well suited to accommodate the future growth of this settlement in that;

- The lands immediately adjoin existing housing and would offer a logical expansion and rounding off to the settlement;
- The site comprises flat topography and would be well suited to housing;
- The site is not affected by flood plain or any other environmental restrictions;
- The site would offer an opportunity to create a more sensitive edge of settlement buffer, with the potential to create a landscaped buffer along the eastern edge of the site to integrate the new and existing built form; thereby improving views on approach from the south along Ballywillan Road;
- The lands ties into the existing river corridor and would offer an opportunity to provide a community park with a the walkway.
- This site presents a tangible opportunity to provide open space provision for Glencoe as [REDACTED] would happily gift the remainder of the host field to the Council to create Community Park.

We respectfully request our clients land is included within the Settlement Limit for Glencoe. This offers a tangible opportunity to meet the future housing needs, while also providing a unique opportunity to enhance the recreational and amenity value of the village. As above this site would offer a considerable area of land to create a new park around the southern edge of the settlement and create a more rational edge to the settlement. This is consistent with the Plan Vision to connect people to recreation space.

[REDACTED] would welcome the opportunity to remain involved in this process.

We trust this will be given due consideration, but should you require any further information please do not hesitate to contact this office.

Yours sincerely

[REDACTED]

Gemma Jobling BSc Dip TP MTRPI
Director
 Jobling Planning + Environment Limited

Encs. Response to POP, September 2017]

Consultation:

Mid and East Antrim Borough Council Local Development Plan
Draft Plan Strategy 2030

Author: [REDACTED]

Unique Reference Number: MEA-C10-8

Date Created: 11.12.2019 - 1:05pm

Representation:

Glenoe- Settlement Hierarchy and Allocation for Housing (On
behalf of [REDACTED])

Status: Submitted

Date Submitted: 11.12.2019 - 1:11pm

Please indicate if you would like your representation to be dealt with by

Oral Hearing (choose this procedure to present your representation orally at the public hearing)

Cover Letter

[REDACTED] Response to Mid East Antrim Council Local Development Plan 2030- Draft Plan Strategy

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Our client is therefore particularly supportive of the following Strategic Objectives;

- Economic Objective

- o a) To provide a sufficient supply and choice of sites for business and employment uses so as to assist in promoting sustainable economic growth in Mid and East Antrim and in meeting the location needs of particular sectors, including new and emerging sectors

- Social Objective

- o a) To support the role of mains towns, small towns, villages and small settlements in accordance with the LDP Spatial Growth..

- o c) To provide a sufficient supply of land for new mixed tenure housing in convenient locations to meet the anticipated housing need...

- o d) To deliver quality residential environments (including associated open space and linkages to green infrastructure networks)

- o f) To support, and where possible enhance the recreation and leisure offer within Mid and East Antrim...

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- SGS2 Settlement Hierarchy

- SGS3 Strategic Allocation of Housing to Settlements

Comments:

Concerns re: SGS 2 Settlement Hierarchy

Chapter or Policy: 5. Spatial Growth Strategy and Country's Development Strategy » 5.2 Settlement Hierarchy

Tests of Soundness: General comment

SGS 2 Settlement Hierarchy

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The following comments are made in respect to Soundness Test:

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Object on the basis that this policy fails to meet Test CE1 in that SGS2 fails to consider how the growth of Larne as a hub town and gateway port is supported in the absence of the designation of supporting towns and whether the limited allocation of Glenoe as a village would have provided a supporting role. It also fails to acknowledges the role Glenoe currently provides insofar as it operates on a village scales, evidenced by the range of services and facilities.

□ Remedy

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SGS 3 Strategic Allocation of Housing to Settlements

Chapter or Policy: 5. Spatial Growth Strategy and Countrys de Strate... » 5.3 Strateg c Hous ng A ocat on Strategy

Tests of Soundness: Genera comment

SGS 3 Strategic Allocation of Housing to Settlements

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community.

Specifically [REDACTED] argues that in addition to re-designating Glenoe as a 'village', the allocation ought to be increased to reflect its role:

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Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances

Object on the basis that this policy fails to meet Test CE2 & CE4 in that the allocation is disproportionate to the strategic growth plan and population demographics. The small settlement allocations are not realistic or appropriate and have not considered the relevant alternatives. The limited allocation for the small settlements is insufficiently flexible to meet future growth needs to deal with changing circumstances.

The identified housing growth figure of 4,614 (of which 879 allocated to Larne and circa < 5 units for Glenoe) dwellings does not allow for the absence of supporting small towns to feed in to labour force, commuter households and a probable delay in the adoption of the Plan which could hinder the Council's ability to review and amend the Plan prior to 2030. This is particularly relevant on the basis of increasing build rates in recent years.

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settlement to the main hub town of Larne, to allow sufficient flexibility to respond to increase householder growth arising from increased employments, its role as a commuter town and to off-set the absence to supporting small towns.

The settlement limits should include a modest rounding off to include sufficient lands to accommodating housing and associated development during the plan period.

Rationalisation of Settlement Limit

Chapter or Policy: Supporting documentation

Proposed Site for Inclusion in Settlement Limit of Glenoe

The lands delineated in Figure 1 below are located at west of Ballywillan Road, Glenoe. The site comprises undeveloped land, located within the existing countryside but not subject to any protective or restrictive designations.

Figure 1 Overview of Lands available for development

The site provides a potential rounding off opportunity for Glenoe and is particularly well suited to accommodate the future growth of this settlement in that;

- The lands immediately adjoin existing housing and would offer a logical expansion and rounding off to the settlement;
- The site comprises flat topography and would be well suited to housing;
- The site is not affected by flood plain or any other environmental restrictions;
- The site would offer an opportunity to create a more sensitive edge of settlement buffer, with the potential to create a landscaped buffer along the eastern edge of the site to integrate the new and existing built form; thereby improving views on approach from the south along Ballywillan Road;
- The lands ties into the existing river corridor and would offer an opportunity to provide a community park with a the walkway.
- This site presents a tangible opportunity to provide open space provision for Glenoe as [REDACTED] would happily gift the remainder of the host field to the Council to create Community Park.

We respectfully request our clients land is included within the Settlement Limit for Glenoe. This offers a tangible opportunity to meet the future housing needs, while also providing a unique opportunity to enhance the recreational and amenity value of the village. As above this site would offer a considerable area of land to create a new park around the southern edge of the settlement and create a more rational edge to the settlement. This is consistent with the Plan Vision to connect people to recreation space.

[REDACTED] would welcome the opportunity to remain involved in this process.

Documents Attached: No

Boundaries Captured on Map: No



PREFERRED OPTIONS PAPER RESPONSE

**Response to Mid and East Antrim District Council Local
Development Plan Preferred Options Paper**

CONTINUATION DOCUMENT (POP Response Form)

September 2017

Jobling Planning and Environment Ltd

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Document Control

Project Reference	Internal	External		
		N/A		
Client	[REDACTED]			
Project Title	MEADC_ POP Response			
Document Title	Continuation Document			
Document Issue	Issue No.	001	Status	FINAL
	Date	4 th September 2017		
	Approved By	GJ		
	Superseded Doc.	N/A		

Contents

1.0 Purpose of Document 5

2.0 Response to POP Questions 6

1.0 Purpose of Document

- 1.1 This document is submitted on behalf of [REDACTED] and provides a response to the Mid and East Antrim District Councils ("MEADC") Local Development Plan ("LDC") Preferred Options Paper ("POP").
- 1.2 [REDACTED] is a fifth generation farmer living in the settlement of Gleno and farming the surrounding lands. [REDACTED] has a vested interest in the long term sustainability of the settlement and of the community and welcomes the opportunity to make representations to the new Local Development Plan for this area. The main thrust of [REDACTED] representation is to ensure that adequate provision is made to enable the sustainable growth of Gleno to enable future generations to remain residing in the settlement. While also protecting the rural nature of the settlement. [REDACTED] seeks to reserve the right to make future representations to the site specific policies that will arise in the latter stages of the LDP preparation. In particular [REDACTED] wishes it to be known that he intends to promote land for the delivery of future homes and open space/ play facilities for the Gleno. While it is understood site specific representations will not be considered at this strategic stage, [REDACTED] seeks to alert the Council to this option at this earliest opportunity.
- 1.3 This paper provides the detailed response and should be read in conjunction with the POP Response Form.

2.0 Response to POP

2.1.1 [REDACTED] is generally supportive of the vision and strategic objectives outlined at section 4.0 of the POP to improve the quality of life for everyone through place making.

2.1.2 In particular [REDACTED] welcomes the Plan Objectives; creating jobs and promoting prosperity and the sub-objectives that seek to;

b. To support the role of small towns, villages, and small settlements as local service centres and commensurate with their place in the settlement hierarchy.

c. To support rural communities by providing appropriate and sustainable opportunities for development in the countryside.

d. To provide a sufficient supply of land for new housing by 2030 in convenient locations to meet general housing needs.

2.1.3 With regards the proposed spatial growth strategy, [REDACTED] is generally supportive of the preferred Settlement Hierarchy but questions whether the status of Gleno as a small settlement should be amended to a village. Gleno exhibits many of the characteristics of a village, including;

- A Church- St Columba's Church of Ireland
- 3 No. village halls; Orange Hall, St Columba's Church Hall (Carneal Road) & Mission Hall (Ballywillan Road)
- A Local shop (McDowell's shop at Waterfall Road)
- Employment provision at McDowells Shop and hard ware and Gleno Dairy
- Workshop Business Units within the centre of the settlement

2.1.4 Despite a smaller population the settlement of Gleno would have a greater number of facilities compared to the nearby village of Glyn and Ballystrudder.

2.1.5 [REDACTED] is in agreement that the future growth of the district should be focused in the main hubs, followed by local towns, villages and that small settlements should be supported to provided sufficient growth for the sustenance of the local rural communities.

2.1.6 Should the Council proceed with classification of Gleno as a 'small settlement', [REDACTED] agrees the proposed consolidation of the built form to provide opportunities for single dwellings and/or small groups of houses should allow for the sustained growth to permit younger generations of rural families to continue to reside in their local area. This should allow for rounding off within the settlements.

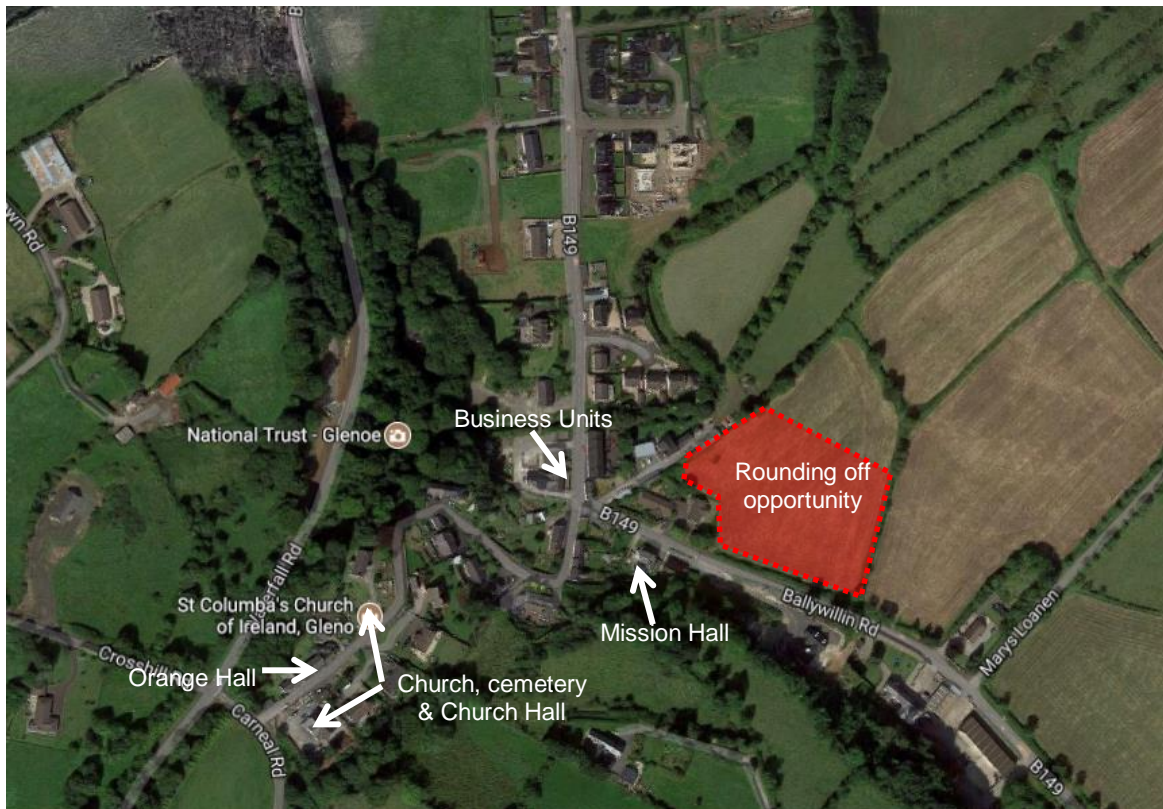
- 2.1.7 [REDACTED] wholly agrees that provision should be made within small settlements to sustain rural communities living in and around villages and small settlements, and that this should be preferred to growth across the rural countryside. Owing to the reduction in rural settlements (villages and small settlements) and the [proposed] restrictive rural policies sufficient provision should be made within the reduced number of smaller settlements. It is noted that the preferred option 2(a) will result in a net reduction in the number of small settlements, specifically the Larne district proposed a reduction of over 50% in small settlements. The implication of this and the pressure on the rural area is not discussed in the POP. It is likely this will place extra pressure on the rural hinterland in this area.
- 2.1.8 Therefore in respect of housing allocation, [REDACTED] would contend that greater proportionate provision should be given for the reduced number of smaller settlements in Larne area to off-set the loss of the 10 other small settlements.
- 2.1.9 [REDACTED] would also have concerns around the stringent application of the Housing Growth Indicators ("HGI") and the implications this may have for the growth of the District. As noted in Section 5.0 Housing Allocation '*are guidance, rather than a cap on housing development in the area or a target to be achieved*' yet the plan goes onto apply the HGI's as an arbitrary ceiling, with little or no discussion around the experiences of the last 10years and how this could have influenced HGI. The HGI of 2008-2025 followed a period of growth and anticipated a demand for some 14,000 new dwellings for the district. The subsequent figure produce in 2012 for 2012-2025 for 5,400 is significantly lower and it should be noted that this is based on unusual period of extremely low growth forced by the economic downturn. There are concerns this figure is a result of the unusual circumstances of 2007 onwards and stringent application would fail to properly plan for growth potential as the District recovers from the economic crisis of the last decade.
- 2.1.10 [REDACTED] would encourage the Council to follow the approach of other Councils and encourage growth in the District. [REDACTED] would encourage a modest uplift on the conservative figure produced in 2012 to reflect the significant gap between the 2008 and 2012 HGI, rather than places this arbitrary gap on the District's growth potential.

- 2.1.11 Recent history has established that over restriction of land supply has a direct influence on land affordability and in turn limits the provision of affordable homes. [REDACTED] is concerned that the application of the HGI in the context of the existing Housing Commitments outlined at Table 5.7 will result in a substantial reduction in zoned land. This will place considerable pressure on land values and have implications for affordability. It is agreed the Plan should provide for realistic growth rather than over provision that could undermine viability, but it should be noted that strict application of HGIs and potential under provision that could further stress housing land values and house prices. [REDACTED] [REDACTED] disagrees with the approach to strictly apply the much reduced 2012-2015 HGI figures, in light of the implications this could have on the District, rather it submitted that the Council should apply a more optimistic approach and aim to grow the District and seek to respond to changes in housing demand. It is submitted that the Council should include an on-going review mechanism to ensure the plan is responsive and can release more land at earlier stages to avoid land pressure and the resultant exponential rise in land values, which, as witnessed in recent years has catastrophic implications for affordability and viability.
- 2.1.12 [REDACTED] would strongly encourage the Council to tie in early and regular fixed review stages to be proactive should the planned housing need increase.
- 2.1.13 Should the Council proceed with the lower 2012 HGI, [REDACTED] would urge the Council to ensure sufficient land is zoned to enable the delivery of these homes to satisfy this projected growth in the plan period. This requires a buffer of over provision to off-set the potential for sites not being delivered. The level of buffer has been extensively debated in the English Planning System with Councils including a 15-20% buffer and adopting a 'Sedfield approach' which provides the buffer in the earlier stages of the plan to off-set any non-delivery. While the Council should of course, through the local plan policies seek to identify and zone a supply of developable sites, there is without doubt a prospect of developable sites not being released or made available by the land owner. This would therefore have knock on effect for the achievement of the Growth Strategy for the District.
- 2.1.14 The purpose of the Plan, in respect of housing, is to ensure the adequate supply of housing to meet housing needs of the local population and future population. This includes inter alia ensuring adequate supply of affordable homes. It is therefore essential that the plan provides ample land to meet the 6,230 number of units but also that there is sufficient choice and competition in the market to achieve the sustainable delivery of both social and private housing. [REDACTED] would encourage the Council to zone sufficient land to ensure the delivery of the projected 6,230 homes and this should include a safeguard of at least 15% over-supply.

- 2.1.15 This can be achieved by over- supply to compensate for the non- release or obstacles in delivering zoned sites.
- 2.1.16 [REDACTED] generally agrees with Preferred Option 4 to *'maintain the status quo in terms of housing allocation based on the proportion of households living in main towns and small towns at the time of the 2011 Census and increase the percentage of housing growth to villages and small settlements at the expense of the open countryside'*. But, as per the foregoing urges caution in Larne area, where the number of small settlements are reducing from 18 to 8. By comparison Ballymena area is increasing the number of small settlements and redesigning several villages to small towns. In order to avoid a un sustainable development pressure in the rural countryside [REDACTED] submits that a slightly greater percentage of the allocation should be given to the villages and small settlements in the Larne area to off-set this substantial reduction in designated small settlements.

Lands within Gleno

2.1.17 As indicated in the foregoing [REDACTED] would encourage the Council to plan for sufficient growth in the small settlements to help sustain rural communities and to ease development pressure in the rural hinterland. In this regard [REDACTED] would encourage the Council, through its Local Policies stage to consider the inclusion of the lands at Ballywillan Road to provide a rounding off for the small settlement of Gleno.



2.1.18 [REDACTED] would be keen to offer up provision of local play area for the settlement, as there are currently no areas of open space in Gleno. Gleno is used as a through route to Carrickfergus from Larne and thus there are safety implications for children playing along the road. In this regard [REDACTED] would encourage the Council to give due consideration to the allocation of a modest area of housing land on this site, supplemented by an area of open space or equipped play area to satisfy current and future recreational needs for the this small settlement.

2.1.19 While it is understood this will be considered in more detail at the subsequent stages of this LDP preparations, [REDACTED] seeks to highlight this opportunity to the Council at the earliest opportunity.

3.0 Concluding Remarks

- 3.1.1 [REDACTED] is generally supportive of the preferred options outlined in the POP, but would urge caution with regards the strict application of the modified 2012 Housing Growth Indicators, owing to the unusual circumstances that precluded the HGI reduction. Rather, [REDACTED] would encourage the Council to be more ambitious in its growth plan for the district and ensure a sufficient supply of land for housing. This should mitigate against the potential for an unsustainable house price increases that could result from insufficient land supply. In this regard [REDACTED] would encourage regular reviews to ensure there is an adequate supply of housing land and allocation to meet changes in demographic and population growth.
- 3.1.2 [REDACTED] alerts the Council to the availability of suitable land within the along Ballywillan Road in the small settlement of Gleno. This land represents a rounding off within Gleno and could sustain modest growth the enable future generations of the residents to continue to reside in the rural location in an un-nagged way, reducing the pressure on the rural hinterland. [REDACTED] encourages the Council to consider the net benefit that could be provided, through the provision of recreation space enabled by provision of housing land.