

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

Your Ref: -
Our ref: 2019543

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 Glenfall Road, Glenoe, which we have identified as being suitable for inclusion within the settlement development limit of Glenoe.

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 main 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...

- 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...

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. We question the status of Glenoe as a small settlement and suggest it 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 (Carnel 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.

Our client agrees 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 provide sufficient growth to sustain local rural communities.

As Larne lacks any supporting small towns, reflected in the Settlement Hierarchy, the consequential 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 be 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 acknowledge the role Glenoe currently provides insofar as it operates on a village

scales, evidenced by the range of services and facilities. It also 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.

➤ 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 2018-203 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 proposes '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 settlement, 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 settlement*". 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 in or close 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 in the 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 our client 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 (comprising 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.

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 fail 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 red in Figure 1 below are located Glenfall Road, Glenoe and are centrally located within the settlement.



Figure 1 Overview of Lands available for development

The site comprises undeveloped land, located within the existing countryside, but centrally positioned between the village shop and services to the north and main housing area to the south. It is not subject to any protective or restrictive designations.

Figure 2 illustrates the extend of land that could be released for housing. While the northern portion of the field could be retained to provide a defensible landscape buffer to improve the current approach along Glenfall Road from the north.



Figure 2 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 northern edge of the site to integrate the new and existing built form.

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.

██████████ 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,

██████████

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

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Consultation:

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

Author: [REDACTED]

Unique Reference Number: MEA-C10-9

Date Created: 11.12.2019 - 2:36pm

Representation:

Glenoe- Settlement Hierarchy and Allocation for Housing (On
behalf of L Rea)

Status: Submitted

Date Submitted: 11.12.2019 - 2:42pm

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

Written (choose this procedure to have your representation considered in written form only)

Cover Letter

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

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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 Countryside Strate... » 5.2 Settlement Hierarchy

Tests of Soundness: General comment

SGS 2 Settlement Hierarchy

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towns around Larne the deficit in growth ought to be re-balanced in the favour of Larne and these villages, by providing additional opportunities for growth.

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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 acknowledge the role Glenoe currently provides insofar as it operates on a village scale, evidenced by the range of services and facilities. It also 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.

□ Remedy

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SGS3- Concern re Housing Allocation for Glenoe

Chapter or Policy: 5. Spatial Growth Strategy and Countryside Strate... » 5.3 Strategic Housing Allocation Strategy

Tests of Soundness: General comment

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 plan's vision for growth. The reliance on the 2016 Housing Growth Indicator (HGI) figure of 5400 for the region is restrictive and lacks aspirations for 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.

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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

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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.

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□ Remedy

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

Suggestions for Extension to Settlement Limit

Chapter or Policy: 5. Spatial Growth Strategy and Countryside Strate... » 5.1 Spatial Growth Strategy

Tests of Soundness: General comment

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- 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 northern edge of the site to integrate the new and existing built form.

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.

██████████ would welcome the opportunity to remain involved in this process.

Documents Attached: No

Boundaries Captured on Map: No