

**Consultation:**

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

**Author:** [REDACTED]

**Unique Reference Number:** MEA-C10-6

**Date Created:** 11.12.2019 - 11:33am

**Representation:**

Allocation for Housing & Employment Land ( On behalf of A  
Steele)

**Status:** Submitted

**Date Submitted:** 11.12.2019 - 11:43am

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**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)

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## Cover Letter

We write on behalf of our client, [REDACTED] & to make a submission in respect 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. In addition to this we draw your attention to specific lands at Greenland Road, Larne, which we have identified as being suitable for inclusion within the settlement development limit of the Larne for a range of uses including housing, industry and recreation/ sports facilities.

## Comments:

### SGS2\_ Concerns re: Lack of Supporting Towns for Larne

**Chapter or Policy:** 5. Spatial Growth Strategy and Countryside Strate... » 5.2 Settlement Hierarchy

**Tests of Soundness:** General comment

Refer to attached letter

SGS 2 Settlement Hierarchy

Our client is concerned about the proportion of growth allocated for this main hub of Larne and the hierarchical designation of small towns, village and small settlements to support the referred strategic position of Larne. Notably there are no small towns designated within the Larne district, while villages close to the town are limited to Ballygalley and Glynn. There is disproportionate allocation of small towns and villages designated to support the growth of Ballymena and Carrickfergus. The justification and amplification at 5.2.3-5.2.9 advises that the spatially small towns are designated to support the main towns in providing a range of development opportunities.

There appears to be no consideration given to the impact of this on the growth potential for Larne. The evidence base for the designation of small towns and villages is largely focused on the growth rates of each settlement, but no consideration is given to the impact on the hub towns. Yet at the paragraphs referred above the DPS make specific reference to the important role of small towns in supporting hub towns.

In the absence of the designation of supporting small towns around Larne the deficit in growth ought to be rebalanced in the favour of Larne, by providing additional opportunities for growth in Larne town itself in order to fulfil REGIONAL Development Strategy's ("RDS") SPGs 10, 11, 12 and 15 as referred at Table 5.1 in DPS. However the Housing Allocation Strategy at 5.3 and Economic Development Strategy at 5.4 allocates a disproportionately low allocation in Larne, which we consider contrary to the town's definition as both a 'gateway' and 'hub town' in the RDS.

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 focus growth in main hub towns, supported by a hierarchy of smaller towns and villages and to reinforce Larne as a gateway town.

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 is sufficient to fulfil this role.

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 CE4 in that the settlement is not reasonably flexible to deal with changing circumstances and specifically to support the role of Larne as a gateway hub town. Allocation is disproportionate to the Strategic Growth Plan and population demographics.

□ Remedy

The Plan needs to be updated to 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 an increase the Allocation (considered under SGS3 'Housing Allocation') within the gateway and hub town of Larne, to compensate for lack of supporting towns and or through resignation of smaller settlements to village status to provide satellite settlements in the absence of small towns.

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## SGS3- Concern re Housing Allocation for Larne

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

**Tests of Soundness:** General comment

Refer to attached letter

## 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 once 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 for 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 ties 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 Larne, which falls considerably short of that allocated for Carrickfergus and Ballymena. This is compounded by the lack of supporting towns and villages in the locality.

The role of Larne is as a strategic hub and gateway town; in addition to having the second largest port in Northern Ireland and being located on the trans-Network route linking Scotland to Northern Ireland into Republic of Ireland, it is also a major industrial town and is now on commuter belt of Belfast following implementation of A8 upgrades it is within the 30minute commuter travel time. However there has been no reference or significant recognition of its role and no specific allowance given to this. Rather at 3.4.3 of the LDP it merely comments on Larne's attributes comprising the Port and retailing. This fails to acknowledge:

- Considerable levels employment (including manufacturing and Research & development)- major industrial town home to Caterpillar, Warner Chilcott (major pharmaceuticals- manufacturing/ R&D), Terumo BCT (pharmaceuticals) and Rapter Phototonics in addition to the considerable research and development industries at Willowbank Enterprise centre. In order to retain these employers there needs to be sufficient flexibility to enable ongoing growth and access to skilled labour force. This requires sufficient provision for household growth, particularly in the absence of proximity to supporter towns.
- Tourism Growth potential- located on the gateway to the Causeway Coastal route and the Glens of Antrim, along with Game of Thrones and considerable natural heritage interests. This region has considerable scope for tourism growth and this requires sufficient access to a labour force to support this growing industry.
- Commuter distance of Belfast- following upgrade of A8 in last 10 years Larne is now becoming recognised as a commuter town for Belfast, with travel times into Belfast circa 30minutes by car, just over 30 minutes by bus and 45 minutes by Train. The growth in interest of this role has been considerable in recent years and is expected to increase. There has been no consideration given to this in the DPS.

In respect of the last point, Larne is well placed along the strategic transport network to provide supporting and commuter role. The DPS has not demonstrated sufficient consideration of the plan aspirations in neighbouring Council district. Belfast Council, through this DPS has ambitious growth plans, including the creation of a further 46,000 jobs over the period 2020-2035. As Larne is now being seen as a viable commuter town, owing to improvement in transport links to Belfast, the household demand for Larne is likely to increase and should have been considered and reflected in the housing allocation.

Therefore in light of this our client has concerns as to whether the Housing Allocation distribution does fully reflect the Regional Development Strategy to focus growth in the main towns and promote the gateway towns and whether it has taken sufficient account of policies for neighbouring Councils, in particular Belfast.

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 and the Strategic Planning Policy Statement to focus growth in main hub towns and provide an adequate and available supply of quality housing to meet the needs of everyone.

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 of Larne as a gateway , how it is will grow in the absence of supporting towns and the role of Larne as a commuter settlements and the impact of the ambitious growth plans for Belfast.

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 CE4 in that the allocation is not reasonably flexibility to deal with changing circumstances and specifically to support the role of Larne as a gateway hub town. The allocation for Larne, compared to Ballymena and Carrickfergus is disproportionate to the Strategic Growth Plan and population demographics for the town and its roles as a commuter town.

The identified housing growth figure of 4,614 (of which 879 allocated to Larne) 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 gateway and 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 resignation of the lands at Greenland Road, referred below to include a modest rounding off of the built form and utilisation of lands for housing and economic use proximate to the pre-existing major area of industry at Caterpillar.

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## SGS5 Concerns re Management of Housing Supply

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

**Tests of Soundness:** General comment

### SGS5 Management of Housing Supply

The DPS suggests there will be no increase to settlement limits and the housing and employment allocation is modest. In light of this it is considered that the phased release of land is unnecessary. The DPS does not provide an in-depth rationale as to the need for this phasing and does not interrogate how this could impact on the delivery of housing in the mains towns. The client is concerned that the preference for release of previously approved lands/ committed could curtail housing supply/ increase land values if there is no mechanism to force release of land or enable Phase 2 lands to be developed if land banking of Phase 1 was to occur.

It is unclear how this proposed phasing pertains to the housing allocation for each town, for example;

- What proportion of the allocation is including Phase 1 and Phase 2?
- What mechanism is there for release of Phase 2 where land owners of Phase 1 are land bank?
- What consideration has been given to impact on land values and ergo the viability to housing being developed?
- What research has been undertaken to ascertain why previously approved land has not been released for development thus far?

The main driver for phasing housing land release is to promote compact urban forms and while this is largely supported by the client this policy needs to be interrogated as to the potential impact on land supply and value as this could impede housing supply.

□ Soundness:

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 SGS5 fails to consider how the phased release will affect land supply and land values. The rationale is focused on achieving compact urban forms but the policy does not interrogate the risk of land banking to force land values upwards. The strategy should include further consideration of ensuring adequate and available housing supply is maintained through the plan period.

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 CE4 in that the phasing restriction is not flexibility to ensure continuous housing supply in the absence fo Phase 1 lands not being released for development.

□ Remedy

Remove Phasing policy.

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## SGS6 Concerns re Allocation of Employment Land in Larne

SGS6 Strategic Allocation of Land for Economic Development

Our client is generally supportive of the Strategic Allocation of land for Economic development which is largely based on UUEPC report. The only concern relates to the statement at 5.9, that suggests the current supply of zoned land remains “sufficient to provide the anticipated amount of employment floorspace and jobs over the plan period.” This suggests that there is unlikely to be any new economic land use zonings. Yet there appears to have been no interrogation of constraint on the release of previously zoned land. It is inadequate to simply rely on previously zoned land and developed land to meet this need, rather DPS should allow for new employment land zoning to ensure an adequate supply of employment land is released for development and not land banked or withheld for development.

□ Soundness:

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 CE4 in that the reliance on previous land zonings to deliver the allocation of land for economic development does not ensure there will be an adequate and available supply of economic land.

□ Remedy

Make provision for zoning of new employment lands to ensure an adequate and optimum supply of employment lands is made available for development. This should include a more robust evidence base to interrogate while previously zoned lands were not developed; was this purely due to lack of demand or were there other constraints.

The settlement limits should include a resignation of the lands at Greenland Road (illustrated at Figure 1 & Figure 2 herein), referred below to include a modest rounding off of the built form and utilisation of lands for economic use proximate to the pre-existing major area of industry at Caterpillar.

**Additional Comments**

Proposed Site for Inclusion in Settlement Limit of Larne

The lands delineated in Figure 1 below are located at west of Greenland Road, Larne. While these lands are located within the settlement limits in the extant Larne Area Plan these were subject to a restrictive ‘Passive Open Space’ designation.

Figure 1 Overview of Lands available for development

The subject lands are proximate to main area of industrial employment land in Larne, situated due west of the main Caterpillar Factory. The lands also lie contiguous with a car sales and mechanic workshop and include former industrial workshops within the site. These lands are located on a strategic route, linking this major economic land use at Caterpillar and Greenland Road junction area to the A8 and close to housing area.

The lands as indicated in Figure 2 would be suitable for provision of housing and industrial/ economic use and would provide a more rationale edge to the built form, before transition into an expansive area of rising open space.

## Figure 2 Potential Land Use

The release of the remainder for usable open space, to provide sports or recreational use would fulfill the strategic objectives and reflect the Plan Vision by connecting people (homes) to employment to recreational and thus offers a bespoke opportunity to fulfill the LDP vision.

This provides a mixed-use opportunity site and is particularly well suited to accommodate the future growth of this settlement in that;

- The lands immediately adjoin existing housing and employment lands and would offer a logical and rounding off to the built form;
- The proposed development lands comprise gently sloping topography and would be well suited to providing housing & employment; AND
- The site is not affected by flood plain or any other environmental restrictions.

On behalf of our client we request the zoning of these is given due consideration.

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**Documents Attached:** No

**Boundaries Captured on Map:** No



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

Dear Sir/ Madam,

Date: 11<sup>th</sup> December 2019

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

Your Ref: -  
Our ref: 2019541

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. In addition to this we draw your attention to specific lands at Greenland Road, Larne, which we have identified as being suitable for inclusion within the settlement development limit of the Larne for a range of uses including housing, industry and recreation/ sports facilities.

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" (paragraph 4.1.4). We further welcome the acknowledgment that Larne is both a 'main hub' and a 'gateway', both of which classifications promote growth to strength its strategic position

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... 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)



- 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 allocation and for Larne and its potential impact for sustainable growth;

- *SGS2 Settlement Hierarchy*
- *SGS3 Strategic Allocation of Housing to Settlements*
- *SGS5 Management of Housing Supply*
- *SGS6 Strategic Allocation of Land for Economic Development*

## **SGS 2 Settlement Hierarchy**

Our client is concerned about the proportion of growth allocated for this main hub of Larne and the hierarchical designation of small towns, village and small settlements to support the referred strategic position of Larne. Notably there are no small towns designated within the Larne district, while villages close to the town are limited to Ballygalley and Glynn. There is disproportionate allocation of small towns and villages designated to support the growth of Ballymena and Carrickfergus. The justification and amplification at 5.2.3-5.2.9 advises that the spatially small towns are designated to support the main towns in providing a range of development opportunities.

There appears to be no consideration given to the impact of this on the growth potential for Larne. The evidence base for the designation of small towns and villages is largely focused on the growth rates of each settlement, but no consideration is given to the impact on the hub towns. Yet at the paragraphs referred above the DPS make specific reference to the important role of small towns in supporting hub towns.

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, by providing additional opportunities for growth in Larne town itself in order to fulfil Regional Development Strategy's ("RDS") SPGs 10, 11, 12 and 15 as referred at Table 5.1 in DPS. However the Housing Allocation Strategy at 5.3 and Economic Development Strategy at 5.4 allocates a disproportionately low allocation in Larne, which we consider contrary to the town's definition as both a 'gateway' and 'hub town' in the RDS.

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 focus growth in main hub towns, supported by a hierarchy of smaller towns and villages and to reinforce Larne as a gateway town.

*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 is sufficient to fulfil this role.

*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 CE4 in that the settlement is not reasonably flexible to deal with changing circumstances and specifically to support the role of Larne as a gateway hub town.

➤ **Remedy**

The Plan needs to be updated to 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 bases considering the impact and potential remedy to tie in more flexibility. Suggest an increase the Allocation (considered under SGS3 'Housing Allocation') within the gateway and hub town of Larne, to compensate for lack of supporting towns and or through resignation of smaller settlements to village status to 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 once 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 for 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 ties 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 Larne, which falls considerably short of that allocated for Carrickfergus and Ballymena. This is compounded by the lack of supporting towns and villages in the locality.

The role of Larne is as a strategic hub and gateway town; in addition to having the second largest port in Northern Ireland and being located on the trans-Network route linking Scotland to Northern Ireland into Republic of Ireland, it is also a major industrial town and is now on commuter belt of Belfast following implementation of A8 upgrades it is within the 30minute commuter travel time. However there has been no reference or significant recognition of its role and no specific allowance given to this. Rather at 3.4.3 of the LDP it merely comments on Larne's attributes comprising the Port and retailing. This fails to acknowledge:

- Considerable levels employment (including manufacturing and Research & development)- major industrial town home to Caterpillar, Warner Chilcott

(major pharmaceuticals- manufacturing/ R&D), Terumo BCT (pharmaceuticals) and Rapter Phototonics in addition to the considerable research and development industries at Willowbank Enterprise centre. In order to retain these employers there needs to be sufficient flexibility to enable ongoing growth and access to skilled labour force. This requires sufficient provision for household growth, particularly in the absence of proximity to supporter towns.

- Tourism Growth potential- located on the gateway to the Causeway Coastal route and the Glens of Antrim, along with Game of Thrones and considerable natural heritage interests. This region has considerable scope for tourism growth and this requires sufficient access to a labour force to support this growing industry.
- Commuter distance of Belfast- following upgrade of A8 in last 10 years Larne is now becoming recognised as a commuter town for Belfast, with travel times into Belfast circa 30minutes by car, just over 30 minutes by bus and 45 minutes by Train. The growth in interest of this role has been considerable in recent years and is expected to increase. There has been no consideration given to this in the DPS.

In respect of the last point, Larne is well placed along the strategic transport network to provide supporting and commuter role. The DPS has not demonstrated sufficient consideration of the plan aspirations in neighbouring Council district. Belfast Council, through this DPS has ambitious growth plans, including the creation of a further 46,000 jobs over the period 2020-2035. As Larne is now being seen as a viable commuter town, owing to improvement in transport links to Belfast, the household demand for Larne is likely to increase and should have been considered and reflected in the housing allocation.

Therefore in light of this our client has concerns as to whether the Housing Allocation distribution does fully reflect the Regional Development Strategy to focus growth in the main towns and promote the gateway towns and whether it has taken sufficient account of policies for neighbouring Councils, in particular Belfast. On this basis our client reluctantly objects to the following policies and submits they do not meet the tests for soundness:

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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 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 of Larne as a gateway , how it is will grow in the absence of supporting towns and the role of Larne as a commuter settlements and the impact of the ambitious growth plans for Belfast.

## *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 CE4 in that the allocation is not reasonably flexibility to deal with changing circumstances and specifically to support the role of Larne as a gateway hub town. The allocation for Larne, compared to Ballymena and Carrickfergus is disproportionate to the Strategic Growth Plan and population demographics for the town and its roles as a commuter town.

The identified housing growth figure of 4,614 (of which 879 allocated to Larne) 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 gateway and 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 resignation of the lands at Greenland Road, referred below to include a modest rounding off of the built form and utilisation of lands for housing and economic use proximate to the pre-existing major area of industry at Caterpillar.

## **SGS5 Management of Housing Supply**

The DPS suggests there will be no increase to settlement limits and the housing and employment allocation is modest. In light of this it is considered that the phased release of land is unnecessary. The DPS does not provide an in-depth rationale as to the need for this phasing and does not interrogate how this could impact on the delivery of housing in the mains towns. The client is concerned that the preference for release of previously approved lands/ committed could curtail housing supply/ increase land values if there is no mechanism to force release of land or enable Phase 2 lands to be developed if land banking of Phase 1 was to occur.

It is unclear how this proposed phasing pertains to the housing allocation for each town, for example;

- What proportion of the allocation is including Phase 1 and Phase 2?
- What mechanism is there for release of Phase 2 where land owners of Phase 1 are land bank?
- What consideration has been given to impact on land values and ergo the viability to housing being developed?
- What research has been undertaken to ascertain why previously approved land has not been released for development thus far?

The main driver for phasing housing land release is to promote compact urban forms and while this is largely supported by the client this policy needs to be interrogated as to the potential impact on land supply and value as this could impede housing supply.

➤ **Soundness:**

*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 SGS5 fails to consider how the phased release will affect land supply and land values. The rationale is focused on achieving compact urban forms but the policy does not interrogate the risk of land banking to force land values upwards. The strategy should include further consideration of ensuring adequate and available housing supply is maintained through the plan period.

*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 CE4 in that the phasing restriction is not flexibility to ensure continuous housing supply in the absence of Phase 1 lands not being released for development.

➤ **Remedy**

Remove Phasing policy.

### **SGS6 Strategic Allocation of Land for Economic Development**

Our client is generally supportive of the Strategic Allocation of land for Economic development which is largely based on UUEPC report. The only concern relates to the statement at 5.9, that suggests the current supply of zoned land remains “sufficient to provide the anticipated amount of employment floorspace and jobs over the plan period.” This suggests that there is unlikely to be any new economic land use zonings. Yet there appears to have been no interrogation of constraint on the release of previously zoned land. It is inadequate to simply rely on previously zoned land and developed land to meet this need, rather DPS should allow for new employment land zoning to ensure an adequate supply of employment land is released for development and not land banked or withheld for development.

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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 CE4 in that the reliance on previous land zonings to deliver the allocation of land for economic development does not ensure there will be an adequate and available supply of economic land.

➤ **Remedy**

Make provision for zoning of new employment lands to ensure an adequate and optimum supply of employment lands is made available for development. This should include a more robust evidence base to interrogate while previously zoned lands were not developed; was this purely due to lack of demand or were there other constraints.

The settlement limits should include a resignation of the lands at Greenland Road (illustrated at Figure 1 & Figure 2 herein), referred below to include a modest rounding off of the built form and utilisation of lands for economic use proximate to the pre-existing major area of industry at Caterpillar.



## Proposed Site for Inclusion in Settlement Limit of Larne

The lands delineated in Figure 1 below are located at west of Greenland Road, Larne. While these lands are located within the settlement limits in the extant Larne Area Plan these were subject to a restrictive 'Passive Open Space' designation.



**Figure 1 Overview of Lands available for development**

The subject lands are proximate to main area of industrial employment land in Larne, situated due west of the main Caterpillar Factory. The lands also lie contiguous with a car sales and mechanic workshop and include former industrial workshops within the site. These lands are located on a strategic route, linking this major economic land use at Caterpillar and Greenland Road junction area to the A8 and close to housing area.

The lands as indicated in Figure 2 would be suitable for provision of housing and industrial/ economic use and would provide a more rationale edge to the built form, before transition into an expansive area of rising open space.



**Figure 2 Potential Land Use**

The release of the remainder for useable open space, to provide sports or recreational use would fulfil the strategic objectives and reflect the Plan Vision by connecting people (homes) to employment to recreational and thus offers a bespoke opportunity to fulfil the LDP vision.

This provides a mixed-use opportunity site and is particularly well suited to accommodate the future growth of this settlement in that;

- The lands immediately adjoin existing housing and employment lands and would offer a logical and rounding off to the built form;
- The proposed development lands comprise gently sloping topography and would be well suited to providing housing & employment; and
- The site is not affected by flood plain or any other environmental restrictions.

██████████ is committed to delivering development on this land and would ask the Council to consider the benefit of developing the lands in Figure 1 for housing, employment with enhanced parkland open 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 MTRPI**  
**Director**  
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