

Data Protection Officer
Mid and East Antrim Borough Council
The Braid
1-29 Bridge Street
Ballymena
BT43 5EJ

Section B. Your Details

Q1. Are you responding as individual, as an organisation or as an agent acting on behalf of individual, group or organisation? (Required)

Please only tick one

- Individual (Please fill in the remaining questions in the section, then proceed to Section F.)
- Organisation (Please fill in the remaining questions in the section, then proceed to Section D.)
- Agent (Please fill in the remaining questions in the section, then proceed to Section E.)

Q2. What is your name?

Title

MR

First Name (Required)

MARK

Last Name (Required)

SMYTH

Email

mark.smyth@g-m-design.co.uk

Q3. Did you respond to the previous Preferred Options Paper?

- Yes
- No
- Unsure

Section C. Individuals

Address Line 1 (Required)

Line 2

Line 3

Town (Required)

Postcode (Required)

Section D. Organisation (AS AGENT)

If you have selected that you are responding as an organisation, there are a number of details that we are legally required to obtain from you.

If you are responding on behalf of a group or organisation, please complete this section, then proceed to Section F.

Organisation / Group Name (Required)

Your Job Title / Position (Required)

Organisation / Group Address (if different from above)

Address Line 1 (Required)

Line 2

Line 3

Town (Required)

Postcode (Required)

Section E. Agents

If you have selected that you are responding on behalf of another individual, organisation or group there are a number of details that we are legally required to obtain from you.

Please provide details of the individual, organisation or group that you are representing.

MARK SMYTH FROM G M DESIGN ASSOCIATES RESPONDING ON BEHALF OF :-

Client Contact Details

Title

[Redacted]

First Name (Required)

[Redacted]

Last Name (Required)

[Redacted]

Address Line 1 (Required)

[Redacted]

Line 2

[Empty]

Line 3

[Empty]

Town (Required)

[Redacted]

Postcode (Required)

[Redacted]

Q4. Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP?

Please only select one.

Agent

Client

Both

(G M DESIGN ASSOCIATES)

Section F. Soundness

The draft Plan Strategy will be examined at Independent Examination in regard to its soundness. Accordingly, your responses should be based on soundness and directed at specific strategic policies or proposals that you consider to be unsound, along with your reasons. The tests of soundness are set out below in Section M.

Those wishing to make representations seeking to change the draft Plan Strategy should clearly state why they consider the document to be **unsound** having regard to the **soundness tests** in Section M. It is very important that when you are submitting your representation that your response reflects the most appropriate soundness test(s) which you believe the draft Plan Strategy fails to meet. There will be no further opportunity to submit information once the consultation period has closed unless the Independent Examiner requests it.

Those who make a representation seeking to change the draft Plan Strategy should also state whether they wish to be heard orally.

Section J. Type of Procedure

Q5. Please indicate if you would like your representation to be dealt with by:

(Required)

Please select one item only

- Written (Choose this procedure to have your representation considered in written form only)
- Oral Hearing (Choose this procedure to present your representation orally at the public hearing)

Unless you specifically request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Section K. Is the draft Plan Strategy Sound?

Your comments should be set out in full. This will assist the Independent Examiner understand the issues you raise. You will only be able to submit further additional information if the Independent Examiner invites you to do so.

Sound

If you consider the Plan Strategy to be Sound and wish to support the Plan Strategy, please set out your comments below.

(Required)

Policy SGS 1 – Spatial Growth Strategy

We support the Council's aims and objectives for facilitating appropriate growth in the Borough's small towns including the provision of additional opportunities for business, retail, housing and services.

Policy SGS 2 – Settlement Hierarchy

We support the draft Plan Strategy's proposal to upgrade the status of Broughshane from a Village and to designate it a Small Town. This re-designation correctly recognises Broughshane's size and growing role in the Borough and its potential throughout the LDP period in the context of its proximity to Ballymena and the supporting role it plays to this Main Town.

Section L. Unsound

In this section we will be asking you to specify which part(s) of the draft Plan Strategy you consider to be unsound.

Note: If you wish to inform us that more than one part of the draft Plan Strategy is unsound each part should be listed separately. Complete this page in relation to one part of the draft Plan Strategy only.

Q6. If you consider that the draft Plan Strategy is unsound and does not meet one or more of the tests of soundness below, you must indicate which test(s) you consider it does not meet, having regard to Development Plan Practice Note 6 available at:

https://www.planningni.gov.uk/index/news/dfi_planning_news/news_releases_2015_onwards/development_plan_practice_note_06_soundness_version_2_may_2017_.pdf

Please note if you do not identify a test(s) your comments may not be considered by the Independent Examiner.

Continued on next page.

Section M. Tests of Soundness (Required)

Procedural tests

- P1. Has the plan been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
- P2. Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- P3. Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?
- P4. Did the Council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?

Consistency tests

- C1. Did the Council take account of the Regional Development Strategy?
- C2. Did the Council take account of its Community Plan?
- C3. Did the Council take account of policy and guidance issued by the Department?

Coherence and effectiveness tests

- CE1. The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans of neighbouring Councils.
- CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
- CE3. There are clear mechanisms for implementation and monitoring.
- CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.

Section N. Which part(s) of the draft Plan Strategy are you commenting on?

This should relate to only one section, paragraph or policy of the draft Plan Strategy. If you wish to inform us that you consider more than one part of the draft Plan Strategy is unsound, you can submit further representations by completing and submitting additional copies of this section.

Relevant Policy number(s)

POLICY SGS 3 - STRATEGIC ALLOCATION OF HOUSING TO SETTLEMENTS

(and/or)

Relevant Paragraph number(s)

/

(and/or)

District Proposals Map

/

Please give full details of why you consider the draft Plan Strategy to be unsound having regard to the tests(s) you have identified above. Please be as clear and concise as possible.

Policy SGS 3 – Strategic Allocation of Housing to Settlements

We consider that this policy is unsound in response to the Coherence and effectiveness tests of CE2 and CE4 as follows.

We do not support the Council's notional allocation figure for settlements for 2018 to 2030 as set out in Table 5.4 or the methodology for arriving at this figure as set out in Appendix A, particularly in relation to Broughshane considering the draft Strategy's proposal to re-designate it as a Small Town. The allocation of 176 units for Broughshane is unduly suppressed being less than allocations to the other small towns. We note the recognition that in some settlements existing live planning permission commitments and the status of such sites may change prior to the Local Policies Plan and we consider this inhibiting factor in the actual delivery of housing has not been fully or properly considered.

The adjusted HGI allocation for Broughshane in the draft Plan Strategy following application of the HEF is 176 (downgraded from 182) Figure A3 in Appendix A indicates that between 2012 and 2018 109 dwellings were completed in Broughshane. Table 5.4 – Strategic Allocation of Housing to Settlements 2018 to 2030 from Policy SGC-3 indicates (adjusted HEF less completions) a projected need of just 67 additional dwellings for the period 2018 to 2030, a rate of house building barely a quarter of what has been provided in recent years. Table A3 from Appendix A indicates that there are live residential planning applications in the settlement for 69 units. This assessment results in the draft Strategy's conclusion that existing approvals already exceed the 2018 to 2030 allocation by 2 units. Hence the unrealistic and unreasonable conclusion of the calculations is that the settlement, based on completions and live permissions, already has enough provision for housing throughout the LDP period and that not another dwelling should be provided in Broughshane.

We contend that the period 2012 to 2018 is effectively pre plan and is therefore part of history and that the 109 completions referenced and which form part of the allocation calculations should not be included as it distorts planning for the future in ensuring that Broughshane has an adequate housing allocation throughout 2018 to 2030. Including the completions within the calculations essentially treats the settlement as per its current village designation with an allocation of only 67 units and therefore limited development potential throughout the 2018-2030 plan period. This methodology pays no regard to the draft Strategy's proposal to designate the settlement a Small Town with an adequate housing allocation. Accounting for previous development in the allocation results in a low and unrealistic figure which will hinder the settlement's potential to fulfil this role and the ability to provide an adequate supply of housing and future growth through the plan period.

It is noted Broughshane is largely built out relative to the Ballymena Area Plan. There is limited unzoned undeveloped land remaining within the SDL and few windfall opportunities. In the circumstances that the draft Strategy proposes to upgrade the settlement's function from a Village to a Small Town it is reasonable to expect the settlement should have the flexibility and resources to fulfil that role. This includes a more realistic allocation and supply of housing land to accommodate future growth. Discounting the housing completions and uplift in the allocation is supported by the settlement's context, character and function within the Borough. This includes its proximity to, and supporting role to Ballymena – the Borough's main Centre and its accessibility and proximity to key transport links including the motorway, public transport, community facilities including a large viable Primary School and local town services and employment.

Hence we consider there is a short fall in provision for future housing in the settlement throughout the plan period with an over reliance on the provision of future housing based solely on the delivery of the

If you consider the draft Plan Strategy to be unsound, please provide details of what changes(s) you consider necessary to make the draft Plan Strategy sound.

69 units with live permissions. The methodology for the allocation is not consistent with the proposed approach for some villages which are considerable smaller. The methodology is flawed because of an inappropriate inclusion of past house building. Although the methodology acknowledges that some of the permissions for undeveloped sites may lapse it does not consider if the extant approvals referenced are viable approvals or if they are in the right place within the settlement in order to provide an adequate supply of housing with a range of accommodation throughout the plan period.

The settlement is compact and largely built out with limited opportunity for future development within the urban area as confirmed by Figure A5 of Appendix A which identifies only 8 Windfall units for the settlement. The opportunity for such development within Broughshane is significantly less than comparable towns demonstrating how tightly developed this Small Town is with minimal development opportunities compared to the other Small Towns. Figure A5 also illustrates that there is a social rented need of 115 units.

In these circumstances we contend that the allocation figures should be adjusted and should exclude the previous completions. This approach will provide greater provision for Broughshane that acknowledges its re-designation as a Small Town and its strengths and opportunities by ensuring adequate housing to meet a range of accommodation and tenure needs throughout the LDP period.