

BY EMAIL AND POST

9th December 2019

Our Ref: C04268

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



Dear Sir/Madam,

Re: Mid and East Antrim Borough Council Local Development Plan – Response to the draft Plan Strategy (dPS) for lands located to the west of Ballygalley

This letter is submitted on behalf of our client [REDACTED] and relates to the publication of the Mid and East Antrim Borough Council draft Plan Strategy, which was launched by the Council on Tuesday 17th September 2019. It highlights how some draft policies are not sound and proposes how such policies could be amended to become sound. In addition to this we draw your attention to specific lands that we have identified as being suitable for housing in order to contribute towards meeting the housing need for the district as set out in the strategy.

Development Plan Practice Note 6 sets out 3 main tests of soundness for Local Development Plans, with each test having a number of criteria, as follows:

Procedural Tests

- P1 Has the DPD 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 DPD been subject to sustainability appraisal including Strategic Environmental Assessment?*
- P4 Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?*

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?*
- C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?*

Coherence and Effectiveness Tests

- CE1 *The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs 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; and*
- CE4 *It is reasonably flexible to enable it to deal with changing circumstances.*

Mid and East Antrim Borough Council Vision

"Mid and East Antrim will be shaped by high quality, sustainable and connected places for people to live, work, enjoy, invest and visit, so as to improve the quality of life for all"

We **support** this vision as it a positive position the council area over the plan period to 2030 and reflects the Council aspirations for the area to have improved job opportunities, house availability and connectivity that meets the needs of the community. It also sets out that quality of life is also influenced by prosperity of individuals and communities, making the Council area a better place in which to live and work over the plan period.

Strategic Objectives

On pages 44-46, the council sets out 25 Plan Strategy Objectives broken up into three broad categories:

- **Economic** – LDP Topic Areas: Sustainable Economic Growth/Transportation, Infrastructure and Connectivity
- **Social** – LDP Topic Area: Building Sustainable Communities
- **Environmental** – LDP Topic Areas: Countryside Strategy, Stewardship of our Built Environment and Creating Places, and Safeguarding our natural environment

We are generally supportive of these 25 objectives in principle. Further discussion on the relevant strategic policies are discussed in detail below

Spatial Growth Policy

We are **generally supportive** of the Spatial Growth Strategy set out below. Specifically, the criterion to sustain rural communities living in and around villages and small settlements. However, the role of villages such as Ballygalley should also be considered as providing opportunities for housing and employment of an appropriate scale and character to individual settlements.

SGS1 Spatial Growth Strategy	
Table 5.2 Spatial Growth Strategy	Link to RDS Spatial Framework Guidance (SFG)
Manage growth to secure sustainable patterns of development across Mid and East Antrim.	
Focus major population growth and economic development in the three main towns of Ballymena, Carrickfergus and Larne, strengthening their roles as the prime locations for business, retail, housing, administration, leisure and cultural facilities within the Borough.	SFG1, 4, 5, 10, 11, 12, 15
Facilitate appropriate growth in our small towns to provide opportunities for business, retail, housing and services.	SFG13, 14
Sustain rural communities living in and around villages and small settlements.	
Facilitate sustainable development in the open countryside, balancing the need to protect the environment and rural character while sustaining a strong and vibrant rural community.	

Spatial Growth Strategy 3

Spatial Growth Strategy 3 relates to the allocation of housing to settlements and states that the plan will make provision for 4,256 dwellings for the period of 2018-2030 and 350-400 new dwellings in the countryside over the same period creating a total of 4,614 units for the borough. It is noted that this strategic proposal sets out a notional allocation figure for settlements, however, these figures represent a significant reduction to that proposed within the Preferred Options Paper.

The Preferred Options Paper, which was published in June 2017, anticipated that the borough will need land for approximately 6,230 homes from 2015 to 2030. The preferred option was to apportion the 6,230 units between various settlements (Main towns (58%), small towns (15%), villages (10%). Small settlements (5%) and Countryside (12%).

Mid and East Antrim Borough Council propose to adhere to the Housing Growth Indicators published by the Department for Infrastructure, which indicate that 5,400 dwellings for the Mid and East Antrim Borough will be required for the period 2012-2030. This is a significant reduction on the previous HGI

for the period 2008 to 2025 which allocated a total of 14,000 dwellings across the Council Area. The Council projected the figure of 5,400 on a pro rata basis up to 2030 for the period 2012–2030 giving a figure of 7,477, which translates to 6,230 units required for the plan period 2015-2030.

A much more robust figure to base future allocations on is the new dwelling completion data over the period 1998 – 2013 contained within the Northern Ireland Housing Land availability Summary Report 2013 (DoE, July 2014 Revision, Annex 2). The combined build out rate over the period 1998-2013 for the Mid and East Antrim Council Area as per the DoE 2014 Summary Report was 8060 dwellings. The latest HGI for the combined Mid and East Antrim area (see Annex 1) is 5,400 dwellings which is a shortfall of 2,660 dwellings. This shortfall represents a significant under-allocation of dwellings for the Mid and East Antrim District Council Area for the plan period.

It must be noted that the HGI figures referred to in the RDS are not targets, they are instead “produced as a guide for those preparing development plans” and are “an estimate of the new dwelling requirement” (page 100, RDS 2035). This is echoed in paragraph 6.139 of the SPPS which states that Housing allocations in LDPs should be informed by RDS HGIs. This terminology does not prevent Councils from calculating their own HGIs on which to base the LDP housing allocations, with (of course) a sound evidential base for doing so.

Sections 8(5)(a) and 9(6)(a) of the Planning Act (Northern Ireland) 2011 require Council’s to “take account” of the RDS in the preparation of the Plan Strategy and Local Policies Plan. There is no legislative requirement to slavishly adhere to the HGIs in the RDS or to prevent Council from determining its own housing projection figures upon which to base their LDP housing allocation (having taken into account the RDS figures) over the period 2015 -2030.

Considering the above the Council should reassess the current HGI figures to take into account more robust dwelling completion data. The logic for such a move is particularly clear when the current proposed growth figure is compared against the previous HGI allocation figure of 14,000 is taken into account. Whilst we are not advocating using this original allocation figure, a more robust and sound approach would be to base allocations on the Housing Land Availability Report, meaning an allocation of 8,060 dwellings should be used for the Mid and East Antrim Borough Council Area for the plan period 2015-2030.

In terms of the distribution of housing the Council have not moved forward in line with their preferred option (4a) which proposed 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. This would mean apportioning housing, between the various settlement tiers and also the open countryside as follows;

- Main Towns (58%)
- Small Towns (15%)
- Villages (10%)
- Small Settlements (5%)
- Countryside (12%)

The draft Plan Strategy apportions the housing allocation as follows:

- Main Towns (67%)
- Small Towns (13%)
- Villages (9%)
- Small Settlements (3%)
- Countryside (8%)

The above is not in line with any of the options put forward within the published Preferred Options Paper document. However, we consider that a compromised position between the POP and draft Plan Strategy should be sought as follows:

- Main Towns (67%)
- Small Towns (13%)
- Villages (10%)
- Small Settlements (3%)
- Countryside (7%)

We consider the above amendment to be justified given that it is largely in line with the draft Plan Strategy growth allocation, with a very minor change to allocated growth within villages and the countryside. We suggest an increased growth of 1% should be provided to villages with a decrease of 1% in the countryside. We consider that this is reasonable given that growth should be limited within the countryside and focused within settlements which can help balance the need to protect the environment and rural character while sustaining strong and vibrant rural communities.

The draft Plan Strategy has now set the plan period as 2018-2030, therefore the housing allocation figures should be amended accordingly. Within the Preferred Options Paper, the housing allocation figure proposed was 6,230 dwellings from 2015-2030. Based on the revised plan period of 2018-2030 and discounting 3 years, the corrected draft Plan Strategy housing allocation should read 4,985 dwelling.

However, in line with our POP submission, we believe the housing allocation figure should be increased further to 8,060 from 2015-2030. Based on the revised plan period of 2018-2030 and discounting 3 years, our suggested amendment to the draft Plan Strategy proposed allocation is 6,449 dwellings for the new plan period 2018-2030. Based on the Councils preferred option 4a and our suggested growth allocation, which apportions 10% of the overall housing allocation figure to the villages and distributes this allocation based on population, 52 new dwellings will be required within Ballygalley within the next plan period as set out in the table below:

Tier	Settlement	Draft Plan Strategy Housing allocation (2018-2030)	Suggested amendment to allocation (2018 - 2030)
Main towns	Carrickfergus	1,239	1,555
	Ballymena	991	1,642
	Larne	879	1,123
	Total	3,109 (67%)	4,320 (67%)
Small Towns	Whitehead	218	180
	Cullybackey	110	120
	Greenisland	96	256
	Ahoghill	94	145
	Broughshane	67	136
	Total	584 (13%)	838 (13%)
Villages	Carnlough	83	90
	Kells/Connor	72	129
	Ballycarry	58	84
	Portglenone	45	77
	Ballystrudder	40	65
	Glynn	39	45
	Ballygalley	38	52
	Glenarm	34	39
	Cargan	16	32
	Clough	12	13
	Martinstown	-16**	19
	Total	421 (9%)	645 (10%)
Small Settlements	Total	142 (3%)	193 (3%)
	Settlement Total	4,256	5,674
	Countryside Total	358 (8%)	451 (7%)
	Mid and East Antrim Total	4,614	6,449

Soundness Test

- Spatial Growth Policy 3 (SGP 3) is not sound as it is not reasonably flexible to enable it to deal with changing circumstances i.e. unexpected growth (Test CE4) and it is not based on a robust evidence base (Test CE2). The projected housing growth of 4,614 underestimates the housing need for the district over the plan period, as detailed above.

Remedy

- Revise SGP 3 to update the housing growth figure to provide 6,449 new homes within the district over the period 2018-2030.

Policy HOU5 'Affordable Housing in Settlements'

Policy HOU5 states that where a need for Affordable Housing is established by the Northern Ireland Housing Executive (NIHE) or other relevant housing authority through a Housing Needs Assessment; proposals for housing developments of 10 dwellings or more, or on a site of 0.2 hectare or more, will only be permitted subject to meeting the following quota:

- Main and Small Towns: 20% Affordable Housing
- Villages and Small Settlements: 10% Affordable Housing

Whilst we support the delivery of affordable homes in the Council Area and welcome the similar to the approach used in the Northern Area Plan 2016 in NIHE identifying need; we consider that the threshold for affordable housing should be introduced once the proposals meet or exceed the 'major residential development' threshold comprising 50 residential units or more or sites of 1ha or more. Setting the provision of affordable housing threshold to major developments is also an approach which has been widely used in England.

The current thresholds are extremely low and the provision of social housing dwellings on small-scale development sites will render many unviable; resulting in a significant decline in small scale housing developments.

Soundness Test

- Policy HOU5 is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) and it is not based on a robust evidence base (Test CE2).

Remedy

- Revise HOU5 so that affordable homes provision is only required on 'major residential development' that comprises 50 units or more and/or where there is an identified level of need in agreement with NIHE.

Policy HOU7 'Adaptable and Accessible Homes'

Policy HOU7 relates to adaptable and accessible homes and states that planning permission will be granted for a new dwelling where a number of criteria are met. This includes criteria relating to Lifetime Homes standards, which ensures that all dwellings are adaptable for all stages of life. As we understand it, the Lifetime Homes standard provide a model for building accessible and adaptable homes capable to accommodate all ages.

Policy HOU7 Adaptable and Accessible Homes

To assist with the delivery of adaptable and accessible homes, planning permission will be granted for a new dwelling where the following criteria are met:

- a) where a dwelling has car parking within its individual plot boundary, at least one parking space should be capable of enlargement to achieve a minimum width of 3300mm. Where communal parking is proposed at least two out of every 20 spaces should have a width of 3300mm;
- b) dining areas and living rooms should allow space for turning a wheelchair;
- c) a living room/living space will normally be expected to be provided on the entrance level of every dwelling;
- d) the principal window in the principal living space should be sited to enable outlook when seated; and
- e) an accessible bathroom, which allows space for turning a wheelchair, should be provided on the same floor as the main bedroom.

All proposals for residential development will also be required to meet the General Policy and accord with other provisions of the LDP.

Whilst some of the Lifetime Homes standards are included in technical booklet Part R of the Building Regulations (Northern Ireland) 2012, many are not. This policy seeks to address those elements of the standards that can be adequately addressed through the planning system. The policy will apply more to new dwellings provided through the private sector as the requirement for Housing Associations to build to the Lifetime Home standards has applied in NI since 1998 and is set out in the DfC Housing Association Guide (HAG).

Although, we support the Lifetime Homes approach, we do not think it should be a planning requirement. In England for example, the Lifetime Homes Standard was once a planning requirement, however, it has since been abolished and built into updated Building Regulations (Requirement M4(2) and/or M4(3)). We believe the same approach should be taken here within Northern Ireland. Lifetime Homes would also create yet another design challenge at planning application stage which may not be achievable on all sites, specifically those which are constrained in terms of size.

Soundness Test

- Policy HOU7 is not sound as it is not based on a robust evidence base (Test CE2) and at planning stage mechanisms for monitoring of building to the lifetime homes standard is not clear (Test CE3)

Remedy

- Revise HOU7 to remove lifetime homes as a planning requirement and ensure it is brought forward under the authority of Building Regulations.

Monitoring & Review

The Local Development Plan is intended to be a flexible document which responds to changing needs and circumstances locally. Monitoring will therefore be essential for the delivery of the local development plan and should provide the basis to trigger any requirement to amend the strategy, policies and proposals of the Plan.

Initial indicators and targets are set out in Technical Supplement 1 Monitoring and Review, accompanying the draft Plan Strategy. We broadly support the monitoring indicators set out in the technical supplement, which are to be used to measure how well the plan is performing in terms of achieving its strategic objectives, including ensuring an adequate supply of housing for the district over the plan period.

However, projected housing figures and other relevant policies specified above should be amended as required in order to enable accurate monitoring of the plan.

Soundness Test

- SPG3, HOU5 and HOU7 are not sound under which the success of the plan is being assessed and are not based on robust evidence (Test CE2).

Remedy

- Revise as per previous recommendations.

Out of date nature of the Larne Area Plan 1984-2010

As per section 3 (1) of the Act the Council must keep under review the matters which may be expected to affect the development of its district or the planning of that development which inter alia, include:

- The principal physical, economic, social and environmental characteristics of the Council's district;
- The principal purposes for which land is used in the district; and
- The size, composition and distribution of the population of the district.

The Larne Area Plan 2010 is significantly past its notional end date and it is expected that a replacement local development plan will not be in final form prior to 2022.

Adopted in 1998, the Larne Area Plan expected that the population of Larne Town will rise from the current 17,600 (approx.) to 19,000 (approx.) by the year 2010 and the population of the Borough from the current 29,419 (approx.) to 31,700 (approx.). As a consequence, there will be a need within both Larne Town and the other settlements to include additional land for development purposes.

However, the AAP considered that Ballygalley would have no further development of the settlement, therefore no lands were zoned for housing within the settlement. It was mentioned that Ballygalley in 1991 had a population of 496.

Despite the plan suggesting that there were no further development opportunities within the settlement, on Census day (29 April 2001) there were 714 people living in Ballygalley. This continued to grow to a population of 821 in 2011. Furthermore, evidence Papers prepared for the emerging Mid and East Antrim Local Plan states that by 2030 the population for the Council area is expected to be 142,114 an increase of over 3,000 people.

The Local Plan is almost 10 years out of date in respect of Ballygalley, and likely to be around nearly 12 years or more out of date by the time the LDP is fully adopted. The Area Plan was designed to provide enough housing land to meet the projected needs of the Council area up until 2010, not 2022 and beyond.

In the context of a rising population trend across the Borough since this time, the population is now even higher and will continue to grow. The reality is that there is a significantly shortfall of land remaining within the settlement limits of Ballygalley under the area plan to provide “adequately” for the housing needs of the settlement before the adoption of the next LDP in 2022 or indeed longer if delays occur.

Housing Land Availability in Ballygalley

The Local Policies Plan will bring forward settlement limits for each of the settlements and allocate land, where appropriate, for new homes and employment to meet the identified needs of our Borough in a sustainable manner. It will also bring forward a range of local designations that will help steer overall growth and development.

It is acknowledged within page 63 of the draft Plan Strategy that in some settlements the existing live planning permission commitments (including those under construction and those approved but not developed) are already greater than their remaining allocation figure (see Appendix of draft Plan Strategy). The status of some of these sites may change prior to the Local Policies Plan e.g. permission for some of the undeveloped sites may lapse. This will be reviewed at that stage.

Ballygalley has a proposed housing allocation of 38 units within the draft Plan Strategy. It is considered that within Ballygalley there are 37 units that the live residential planning permissions within the settlement therefore there is a shortfall of 1 unit. However, on the basis of our arguments set out within Strategic Growth Strategy 3 above, the housing growth figure for Ballygalley should increase to an allocation of 52 over the plan period (2018-2030), which represents a shortfall of 15 units.

Published back in 2018, the Housing Monitor (Annex 3) for the borough identifies that Ballygalley has enough potentially suitable lands to accommodate only 3 housing units (0.08 ha). The Housing Monitor itself uses the term “potentially suitable” to describe the lands it identifies as part of the housing supply. The use of this term acknowledges that not all sites identified in the Monitor are deliverable and highlights that a 5-year supply cannot be maintained.

A review of the lands within carried out by Gravis Planning identified only one remaining site within the settlement limit as seen on the map below. However, this site is associated with the local primary school and is not available for housing.

Therefore, there are currently no available lands suitable for development within the current settlement limit to accommodate any future housing growth, therefore it is evident that additional lands will be required within the next plan period or indeed before.



Proposed site for inclusion within the settlement limits of Ballygalley

The ongoing lack of housing supply in the Council area is at odds with the RDS and the SPPS which seeks to support towns, villages and rural communities to maximise their potential. The growth of the Larne Area and indeed Ballygalley has been under severe pressure given that the population and growth of the settlement had already surpassed that which the Area Plan had been designed to accommodate.

There are no available housing lands within the existing settlement limit of Ballygalley, therefore there does not represent either an “adequate or available supply” within the existing development limit to meet the needs of the settlement. The settlement is currently not being allowed to maximise its potential as a settlement and fulfil its key role in supporting economic growth of the area as set out in the RDS.

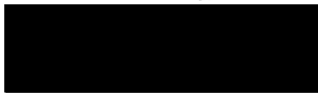
On this basis, we therefore draw to your attention the attached parcel of lands (please refer to Annex 3) for inclusion within the settlement limit of Ballygalley in the forthcoming Local Development Plan (LDP), which could be utilised to accommodate future growth.

The subject site is approximately 5.2ha and is located to the west of Ballygalley along the Cairncastle Road. The lands are currently used for farming purposes with fields all in improved pasture for cattle and sheep grazing. The rationale for the inclusion of the site within the new settlement limit of Ballygalley includes the following;

- There are currently no remaining available sites within Ballygalley for development therefore it is clear that more lands readily available for future development will be required within the next plan period;
- The eastern boundary of the subject lands abuts the current settlement limit of Ballygalley;
- The lower eastern boundary abuts a residential development called Croft Manor;
- The topography of the lands is predominately level and is therefore suitable for development;
- There are no issues with flooding that could preclude future development of the lands;
- Direct access into the site can be taken via the Cairncastle Road.

We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as the LDP progresses.

Yours Sincerely,



Lisa Shannon
Gravis Planning

Appendix 1

LGD level Northern Ireland Housing Growth Indicators 2016-2030 - estimating each of the 5 key components

Table A1: Estimate of housing need by Local Government District 2016-2030

District Council	Household projection 2030	Second Homes 2030	Vacant Stock 2030	Net Conversions Closures and Demolitions 2016-2030	New Stock Estimate 2030	Housing Stock at April 2016	Projected New Dwelling Requirement 2016-2030
Antrim and Newtownabbey	59,200	400	3,200	-400	62,400	58,300	4,200
Ards and North Down	70,100	900	4,500	200	75,800	70,300	5,500
Armagh City, Banbridge and Craigavon	90,500	900	6,300	2,000	99,700	82,500	17,200
Belfast	148,200	1,500	13,000	900	163,500	156,100	7,400
Causeway Coast and Glens	58,300	2,700	5,200	2,400	68,600	62,900	5,600
Derry City and Strabane	60,000	200	4,300	100	64,600	60,500	4,100
Fermanagh and Omagh	46,200	500	4,300	1,300	52,400	48,000	4,300
Lisburn and Castlereagh	63,500	400	3,700	1,100	68,700	58,000	10,700
Mid and East Antrim	59,200	200	3,600	1,000	64,100	58,700	5,400
Mid Ulster	57,000	200	3,500	2,300	63,000	52,600	10,300
Newry, Mourne and Down	72,300	800	5,300	300	78,700	68,600	10,000
Northern Ireland	784,600	8,700	57,000	11,100	861,300	776,500	84,800

Cells are rounded to the nearest 100. Calculations have been worked out using unrounded data. Therefore summing individual figures in the table above may not add to total.

District	Sector	Units Complete 31-12-98 to 31-07-13	Units Complete 01-08-12 to 31-07-13	Area Developed (Hectares) 31-12-98 to 31-07-13	Area Developed (Hectares) 01-08-12 to 31-07-13	Units Dev. Within the Urban Footprint (%) 01-08-12 to 31-07-13	Available Potential (Hectares)	Available Potential (Dwelling Units)
BALLYMENA	Ballymena (Town)							
	Urban Footprint		50		1.5		67.2	1918
	Greenfield		8		0.3		66.2	1674
	TOTAL	1654	58	77.2	1.8	86.2	133.4	3592
	Other Settlements	1505	34	69.3	1.2		59.0	1633
	DISTRICT TOTAL	3159	92	146.5	3.0	86.2	192.4	5225

District	Sector	Units Complete 31-12-98 to 31-07-13	Units Complete 01-08-12 to 31-07-13	Area Developed (Hectares) 31-12-98 to 31-07-13	Area Developed (Hectares) 01-08-12 to 31-07-13	Units Dev. Within the Urban Footprint (%) 01-08-12 to 31-07-13	Available Potential (Hectares)	Available Potential (Dwelling Units)
CARRICKFERGUS	Carrickfergus (town)							
	Urban Footprint		27		0.9		97.9	2937
	Greenfield		0		0.0		1.8	36
	TOTAL	1850	27	74.7	0.9	100.0	99.7	2973
	Greenisland							
	Urban Footprint		7		0.2		29.8	695
	Greenfield		9		0.5		11.2	241
	TOTAL	429	16	20.2	0.7	43.8	41.0	936
	Whitehead							
	Urban Footprint		0		0		3.6	72
	Greenfield		0		0		0	0
	TOTAL	242	0	10.8	0	0	3.6	72
	Other Settlements	5	0	0.7	0		0.6	11
	DISTRICT TOTAL	2526	43	106.4	1.6	79.1	144.9	3992

District	Sector	Units Complete 31-12-98 to 31-07-13	Units Complete 01-08-12 to 31-07-13	Area Developed (Hectares) 31-12-98 to 31-07-13	Area Developed (Hectares) 01-08-12 to 31-07-13	Units Dev. Within the Urban Footprint (%) 01-08-12 to 31-07-13	Available Potential (Hectares)	Available Potential (Dwelling Units)
LARNE	Larne (Town)							
	Urban Footprint		6		0.2		38.3	1347
	Greenfield		8		0.3		57.4	1607
	TOTAL	1583	14	66.0	0.5	42.9	95.7	2954
	Other Settlements	792	8	37.6	0.6		53.2	1280
	DISTRICT TOTAL	2375	22	103.6	1.1	42.9	148.9	4234



BALLYGALLEY												
14110	Infill Site	Within the Urban Fabric	0.08	1	0	1	0.00	0.00	0.08	0		Development On-Going
15341	Infill Site	Within the Urban Fabric	0.12	2	2	0	0.12	0.12	0.00	2		Complete
			0.20	3	2	1	0.12	0.12	0.08	2		

