

## How We Are Consulting

The easiest and quickest way to comment is by completing our online response form:  
[consult.midandeastantrim.gov.uk](https://consult.midandeastantrim.gov.uk)

Alternatively, complete this draft Plan Strategy Response Form and either return by email to [planning@midandeastantrim.gov.uk](mailto:planning@midandeastantrim.gov.uk) or download a copy and post to:

Local Development Plan  
Team, County Hall, 182  
Galgorm Road,  
Ballymena,  
BT42 1QF.

The draft Plan Strategy is published for formal public consultation for a period of eight weeks beginning on **Wednesday 16 October and closing at 5pm on Wednesday 11 December 2019**. Please note that in order for comments to be considered valid you must include your contact details. We will use these details to confirm receipt of comments and to seek clarification or request further information. Anonymous comments or comments which do not directly relate to the draft Plan Strategy will not be considered as part of the consultation process. For further details of how we handle representations, please refer to our Polices Notice which can be accessed here [https://www.midandeastantrim.gov.uk/downloads/privacy\\_notice\\_ldp.pdf](https://www.midandeastantrim.gov.uk/downloads/privacy_notice_ldp.pdf).

## Section A. Data Protection

### Local Development Plan Privacy Notice

Mid and East Antrim Borough Council is a registered data controller (ZA076984) with the Information Commissioner's Office and we process your information in accordance with the General Data Protection Regulation and Data Protection Act 2018.

Mid and East Antrim Borough Council collects and processes personal information about you in order to fulfil our statutory obligations, to provide you and service users with services and to improve those services.

Our Privacy Notice relates to the personal information processed to develop the Council's Local Development Plan (LDP) and can be viewed at [https://www.midandeastantrim.gov.uk/downloads/privacy\\_notice\\_ldp.pdf](https://www.midandeastantrim.gov.uk/downloads/privacy_notice_ldp.pdf). It contains the standards you can expect when we ask for, or hold, your personal information and an explanation of our information management security policy. All representations received will be published on our website and made available at our Local Planning Office, County Hall, 182 Galgorm Road, Ballymena, for public inspection and will be forwarded to the Department of Infrastructure in advance of Independent Examination.

If you wish to find out more about how the Council processes personal data and protect your privacy, our corporate privacy notice is available at [www.midandeastantrim.gov.uk/privacy-notice](https://www.midandeastantrim.gov.uk/privacy-notice).

### Why are we processing your personal information?

- To enable the preparation of the Council's Local Development Plan;
- To consult your opinion on the Local Development Plan through the public consultation process as well as other section functions;
- To ensure compliance with applicable legislation;
- To update you and/or notify you about changes; and
- To answer your questions.

If you wish to find out more information on how your personal information is being processed, you can contact the Council's Data Protection Officer:

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)

Eamonn

Last Name (Required)

Loughrey

Email

eamonn@inaltus.com

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

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.

NK Holdings Ltd

**Client Contact Details**

Title

[REDACTED]

First Name **(Required)**

[REDACTED]

Last Name **(Required)**

[REDACTED]

Address Line 1 **(Required)**

NK Holdings Ltd

Line 2

40 Trailcock Road

Line 3

Town **(Required)**

Carrickfergus

Postcode **(Required)**

BT38 7NU

**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

## 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)**

## 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](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)

Strategic Social Objective C; SGS 3; SGS 5 & Policy MIN 6

(and/or)

### Relevant Paragraph number(s)

7.4.31-7.4.32

(and/or)

### District Proposals Map

Map 7.1

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.

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.

## Mid and East Antrim Borough Council Local Development Plan

### Response to Draft Plan Strategy

Ref: 16/11 (20)(PS)

Client: NK Holdings Ltd

1. We make this submission on behalf of NK Holdings Ltd. NK Holdings Ltd own lands at Trailcock Road within the settlement of Carrickfergus, which are zoned as a Major Area of Existing Employment/Industry. The lands are access along a single narrow lane taking its access from the housing area of Trailcock Road. The lands are located behind the housing areas of Lennox Drive and Regent Avenue. New access is available to these lands from Regent Drive, which would facilitate reuse of this site for housing development. Reuse of the lands for housing would allow NK Holdings Ltd to relocate and expand in a more suitably located industrial development on the outskirts of Carrickfergus.
2. We have made a representation to the Preferred Options Paper. We do not repeat the comments previously made, albeit we rely upon them at the future Public Inquiry.
3. NK Holdings Ltd's principal concern relates to housing and the need for a proper Housing Requirement figure to be determined and for an appropriate housing allocation to be given to Carrickfergus to help grow Carrickfergus over the Plan period. We also acknowledge the recent employment land use survey of the Council that finds the lands at Trailcock Road should be rezoned for alternative uses.
4. To this end we append a Working Paper on Plan Strategy Housing Matters at **Appendix A** and a Working Paper on Plan Strategy Carrickfergus Housing Matters at **Appendix B**. For ease of reference, we also include at **Appendix C** the POP submission we made on NK Holding Ltd's behalf. Again the main points raised in our POP submission are consistent with our current case. We have elaborated on the case and addressed matters we are concerned with in the Council's approach.

5. In summary the case is that:

- a. there needs to be a change to the Plan Objectives;
- b. the Housing Requirement figures need to be objectively reassessed;
- c. the allocation of housing needs to reflect Carrickfergus' important role in the Borough;
- d. the lands allocated in existing settlements need to be critically reviewed under the Local policies Plan (LPP) in the context of deliverability over the Plan period;
- e. land uses should be zoned for the most suitable use given the surrounding land use context; and
- f. development of lands should not be frustrated by vague and uncertain designations.

## Details

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

6. The Plan is unsound because:-

- P2 The Council has not taken properly into account representations made at the POP stage;
- C3 The Council has not taken account of the SPPS and the Chief Planners letter in respect of the approach to HGI figures;
- CE1 The Council has not set out a Strategy from which all policies logically flow as the Strategy does not include robust Housing Requirement calculations and the figures presented do not reflect the actual allocations;
- CE2 The Strategy, policies and allocations are subdued in respect of housing and have not considered the relevant alternatives and material considerations highlighted in **Appendix A** and are not founded on a robust evidence base. The policies in relation to subsidence are overly onerous and not sufficiently precise;
- CE4 The Plan Strategy is not reasonably flexible to deal with changing circumstances. The Plan Strategy does not reflect the potential that Carrickfergus is under provided for in the Housing Requirement allocation.

7. Social Objective c) of the draft Plan Strategy seeks to provide 7,500 dwellings between 2012 and 2030. The Plan period is 2015-2030 and the housing objective should reflect

the Housing Requirement for this period, plus an allowance for a 5 years supply at the end of the Plan period.

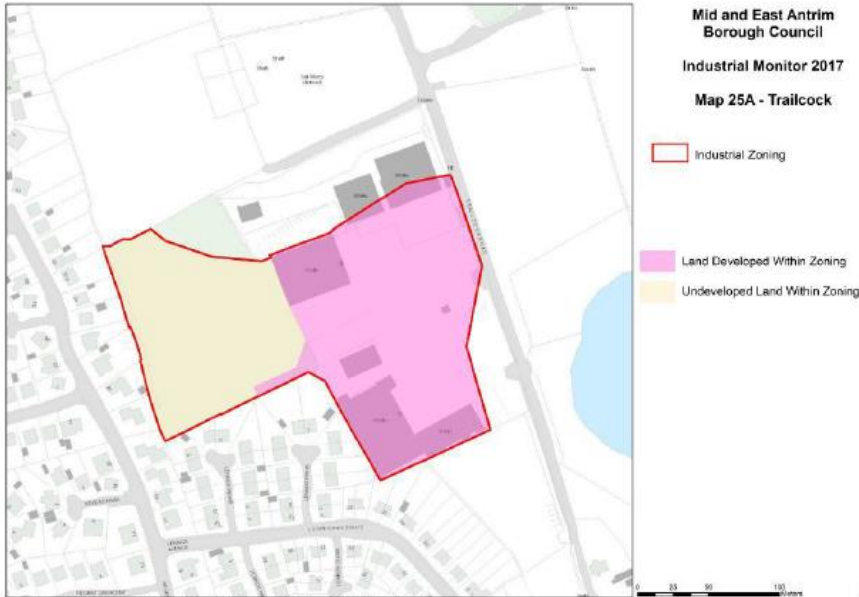
8. Social Objective c) is inconsistent with SGS 3 which seeks to provide 4,256 dwellings between 2018 and 2030. Whilst we understand this is a pro rata out working of the Housing Requirement figures estimated by the Council, for many lay people, differing timeframes and differing Housing Requirement figures are confusing. Figures applied should be consistent, and if not an explanation should clearly set out how figures have been reached.
9. The Housing Requirement figures are underestimated and do not reflect the requirement of the Council to treat the HGI figures provided by DfI as a starting point. We set out at **Appendix A** why we consider the Housing Requirement figures to be unrealistic and not robust. It is our view that they are not based on the evidence available, nor are they fulfilling the requirements of the SPPS.
10. We object to SGS3 as the Housing Requirement figure is insufficient for the MEA area, and should be significantly up lifted in line with our comments set out at **Appendix A** and **Appendix C**. We do not consider that the Housing Requirement figures have assessed the full spectrum of factors that need to be inputted into the calculation. Rather than present additional figures, we note there is now a requirement on the Council to amend their figures to reflect the latest updated HGI's produced by DfI and assume the Council will produce a further Housing Requirement paper that we can comment on. Failure to do so would clearly leave the draft Plan Strategy unsound.
11. In respect of the housing allocations set out in Table 5.4 of the draft Plan Strategy, we reiterate our view that the allocation should be 65% to main towns, 20% to small towns, 8% to villages, 2% to small settlements and 5% to countryside housing. Carrickfergus should be allocated 27% of the global Housing Requirement.
12. We note that SGS 5 proposes to zone sites with live permissions on it (more explanation is also provided at paragraphs 5.3.20 and 5.3.30). The Council are supposed to be moving towards a Plan-led system where it allocates land where developers will have confidence in the future that planning permission will be allowed.

13. The approach being suggested in the draft Plan Strategy is a development management lead one where the Council appears to be zoning lands that developers and landowners already know is suitable for housing. This approach makes the draft Plan Strategy toothless in this respect. The Plan should be zoning those lands which do not have planning for housing on them and to direct future housing to them. That is the Plan-led approach.
14. Draft Plan Strategy paragraph 5.3.28 notes that *“During reviews of the LDP, consideration will be given to the level of commitment and investment made by landowners to release and progress phase 1 housing land. Where no demonstrable progress has been made, consideration will be given to re-designating the land at review stage”*. The Council is relying in its Urban Capacity Study on lands in Carrickfergus that have been zoned for over 15 years in dBMAP and never been developed. Continuing to zone such lands now to demonstrate that the Council can meet the housing requirement for Carrickfergus will simply extend the delay in providing a realistic deliverable supply of housing land to support the community of Carrickfergus.
15. Our Working Paper at **Appendix B** considers the Council’s evidence in its assessment of the availability of housing land in Carrickfergus. It will be seen that we consider the Council is overestimating the availability of land that can realistically be considered to come forward to meet the housing requirement for Carrickfergus.

### **The Case of Re-zoning Trailcock Road Lands**

16. Moreover, we note that the Council’s consultants have been considering the merits of retaining our clients lands as industrial use. Below sets out their view which is that access to the site is poor and demand for industry at this location would be limited and that alternative uses should be considered. The case for removing our client’s site from industrial land zoning is further reinforced by the Council’s economic study prepared by Ulster University Economic Policy Centre, which finds there to be a potential reduced need for industrial employment and the Council’s Industrial Economic Land Monitor, which finds adequate supply of industrial land in Carrickfergus. The only location identified as needing additional employment lands is Ballymena. Removal of our client’s land from employment use will not undermine the supply and distribution of employment land in Carrickfergus.

Map 25A – Trailcock (undeveloped part within industrial zoning)



Description	Size	CBRE Recommendation
located at the north-eastern fringes of the Carrickfergus settlement limit, accessed via a narrow laneway. Uses in the area are agricultural and residential.	1.2Ha	As access to the subject lands is poor we would be of the opinion that there would be limited demand for industrial land within this area, and an alternative use should be considered.

Extract of CBRE Availability and Supply Report

17. As explained above, in order to make this land a good neighbour to the adjacent land uses, our clients would seek to develop this site for residential use. They have acquired dwellings along Regent Drive that could provide a new access to the land to accommodate housing development. Below is an illustrative layout that shows the new access and how the development might be set out.



**Illustrative Layout at Trailcock Road**

#### **Area of Subsidence Policy**

18. We also note that the draft Plan Strategy Policy MIN6 deals with Areas of Subsidence in Carrickfergus. Map 7.1 identifies two areas of subsidence east and north of Trailcock Road. We note that the area east of Trailcock Road has already collapsed and is now an area of open water and the area north of Trailcock Road is fenced off and controlled. Moreover, we note that housing has been built at Trailcock Close and there has been no concerns regarding subsidence and the proximity of these dwellings.
  
19. Given the foregoing, we consider it prudent on the Council to undertake a more detailed survey and its own Mine Risk Assessment to provide more detailed mapping that reduces the size of the land identified as areas of potential subsidence. The current draft Map 7.1 is much too vague to provide a clear plan-led approach to future development in this part of the settlement. This is a strategic matter that the Council should be taking a lead on at this point of the Local Development Plan process.

## Modifications

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

21. As set out above the following changes should be made to the Draft Plan Strategy:

- a. Social Objective C should provide a higher level of Housing Requirement across a clear plan period and allow for overzoning or a 5 year supply beyond the notional plan end date;
- b. The draft Plan Strategy should set out at SGS5 that the future development of lands for housing will be zoned, and not simply zone lands that already have planning permission;
- c. The draft Plan Strategy should make it clear that zoned housing lands that have shown no prospect of development for housing will be considered for alternative uses to allow future housing lands to come forward which can meet the needs of towns and villages;
- d. The lands at Trailcock Road should be re-zoned for housing development;
- e. The Maps showing the areas of Potential Subsidence at Table 7.1 should be reviewed and a more detailed mapping and a Mine Risk Assessment undertaken that more closely reflects the actual area of potential subsidence in detail and reflects the fact that the mine east of Trailcock Road has already collapsed and new housing has been allowed at Trailcock Close.

## Appendices

- A. Working Paper on Plan Strategy Housing Matters;
- B. Working Paper on Plan Strategy Carrickfergus Housing Matters;
- C. POP Submission (including site map and Working Paper on Housing Matters).

## Appendix A Working Paper on Plan Strategy Housing Matters

### Introduction

1. This paper builds upon our Working Paper submitted in respect of the Preferred Options Paper. We append our POP Submission and Working Papers at **Appendix C** and therefore do not repeat it here. Instead we update the key components of it having regard to the Council's latest evidence as set out in the various Technical Supplements and Supporting Studies.

### Updated Housing Growth Indicators (uHGI)<sup>1</sup>

2. It is unfortunate that the Department for Infrastructure has only on 25 September 2019 published and presented updated Housing Growth Indicators. The DfI's figures highlight that Mid and East Antrim (MEA) has a Housing Requirement between 2016-2030 of 5,400.
3. There are a number of observations to make here. The DfI know full well that Council's are preparing area plans based on a plan period typically 2015-2030. However, DfI insist on presenting information that is out of step with Council Plan Periods. This is clearly unhelpful.
4. The release of the DfI figures results in the Council's draft Plan Strategy being immediately out of date. While many Council's treat HGIs as merely a guide, and changes to the DfI figures could be seen as unhelpful, but not serious, MEA regrettably relies on the DfI figures (wrongly in our view) as the best available evidence and it sees no reason to depart from the figures. That means the Council's draft Plan Strategy is out of date as now even DfI have departed from their own figures. It plainly illustrates the uHGIs as simply being a guide.
5. We enclose at **Annex A** a copy of the Chief Planners letter to the Head of Planning at MEA dated 25 September 2019, wherein the Chief Planner makes a number of important points:
  - a. The uHGIs run to 2030 which '*better correspond with the timescale for the majority of Local Development Plans (LDP) currently under preparation*'. The Chief Planner does not acknowledge that the data is 2016 based not 2015, nor does the Chief Planner acknowledge that given it is now the end of 2019 and there is no Plan Strategy or Local policies Plan (LPP) likely to be in place for a number of years, the Plan period will run for most Plans well beyond 2030;
  - b. The uHGIs do not forecast exactly what will happen in the future;

<sup>1</sup> rHGIs refers to revised HGIs produced by DoE in 2016 and uHGI refers to updated HGIs produced in 2019.

- c. The uHGs are 'policy neutral' estimates based on recent trends and best available data on households and housing stock;
  - d. The uHGs assume past trends will continue into the future;
  - e. The uHGs do not attempt to model existing policy or societal factors nor predict the impact that future policies, changing economic circumstances or other future events may have on housing requirements in LDPs;
  - f. uHGs are not a cap or target, but are a starting point to guide assessment of overall housing requirements in LDPs;
  - g. Council's should assess the uHGs applicability to local circumstances in the context of the SPPS requirements and other Council Strategies/Objectives, the likely impact of corresponding strategies in neighbouring Council's, the capacity of existing or planned infrastructure to facilitate development or other evidence of recent build rates;
  - h. LDPs must aim to make provision for the housing requirement considered appropriate as a result of analysis of all relevant sources of evidence...This reflects the reality that appropriate LDP housing requirements are influenced by a complex range of factors within the Plan Area and beyond.
6. The uHGI presents MEA with a 2015-2030 pro rata requirement of 5,786 dwellings, an annual build rate of 385.7 dwellings per annum (dpa). This is a further reduction on the draft Plan Strategy (dPS) figures of 477 dpa since 2012 (according to Table 7.4 of Technical Supplement (T/S) 3). Based on these most recent average build rates the uHGI would be met within 12 years (i.e. 2027).
7. It can also be seen in T/S 3 Table 7.4 that since 2015/16 the Council's estimates are that 1980 dwellings have been built in the 3 years 2015-2018, which is a build rate of 660 dpa. An average build rate of 660 dpa would deliver 9,900 dwellings between 2015 and 2030. There remains only a uHGI of 3,806 which based on this level of build rate (660 dpa, will be met by 2024/2025. Consequently the Council would have 5 years with no Housing Requirement. As such for the Council to continue to apply uHGs without further assessment has the potential to seriously curtail growth in MEA.

## Policy Approach to Determining the Housing Requirement

8. The approach to determining the Housing Requirement is guided by the RDS which notes (page 102) that *“Council’s will be able to use the Housing Growth Indicators as baselines or starting points which can subsequently be adjusted in light of the Housing Market Analysis for their area”*.
9. The RDS notes that the *“Northern Ireland Housing Executive is moving to a system of Housing Market Analysis that will aim not only to identify social housing need but also to provide a solid evidence base on which available land can be zoned for housing by planners. There is a growing consensus that there needs to be a broader approach to assessing housing need: one that aims to understand the workings of the wider housing market and that will look holistically at infrastructure, planning, the socio-economic context, regeneration needs, health, education etc”* [Emphasis Added].
10. The RDS notes that a Housing Market Analysis will help develop a comprehensive evidence base to inform decisions about the policies required in housing strategies and the development of area plans.
11. The SPPS page 71-73 notes a range of factors to be considered in the process for allocating housing land. It includes the HGIs that are provided as an “estimate” and “guide” for new dwelling requirements. It notes a requirement to make a windfall allowance but notes that the scale of windfall allowances will vary from area to area, and an allowance can be made on past trends. It also notes that the Housing Needs Assessment/Housing Market Analysis provides an evidence base that must be taken into consideration in the allocation through the development plan, of land required to facilitate the right mix of housing tenures including open market and special housing needs such as affordable housing, social housing, supported housing and traveller accommodation. There is no evidence to suggest that the Council have had regard to the Housing Market Analysis in the manner suggested by the SPPS.

## The Council’s Approach to Housing Requirement

12. We have previously advised in our POP submission, that the Council need to take account of wider factors in deciding the appropriate Housing Requirement, however, the Council has persisted in the dPS to apply the DfI HGIs without proper scrutiny or consideration of policy impacts for example.

13. It is insufficient for the Council to apply the uHGIs on a pro rata basis to the notional Plan Period, make a crude estimate of past build rates and subtract the latter from the former to leave a residual Housing Requirement, and allocate this on a fairly pro rata basis to existing settlements, and tinker with the percentage allocations to settlements. That is the current approach.
14. The Council must fundamentally review its approach to the Housing Requirement looking at the economic and societal demands of MEA and the wider considerations of social housing need, an increasing elderly population, requirement for student accommodation and demand for second homes.
15. We do not need to repeat our comments from our POP submission, but we have already directed the Council to the previous work done that looked at two separate methodologies based on applying past growth rates and longer term household projections. Those figures identified average household formations rates annually of between 522 and 571. Even without considering the factors of the impact of policy (i.e. a “policy-on” effect as opposed to the “policy neutral” uHGIs) it is seen that the household formation rates reflect more closely the Council’s own evidence of the last 3 years housing completion figures of 660 dpa.
16. It would of deep concern to our clients that should the Council apply again the pro-rata uHGI now presented by the DfI that the Council will constrain the long term growth of the MEA and negatively impact the society that the dPS is designed to support.
17. We do not propose to recast our estimates of Housing Requirements and rely upon our POP submission in this regard until such times as the Council produce its revised Housing Requirement that is robust and fully evidence based in line with the requirements of the Chief Planner.

## **A Continuing 5 Year Supply**

18. The SPPS paragraph 6.140 states, “A ‘*plan, monitor and manage*’ approach is necessary to ensure that, as a minimum, a 5 years supply of land for housing is maintained”. The Council should ensure that a 5 year supply of housing is maintained and provided beyond 2030. There are three very good reasons for this:

- a. If the Housing Requirement estimate is correct and all lands are taken up by 2030, there is no prospect that the Council will have a new Plan in place in 2030, based on past and current evidence;
  - b. If the Council's supply of housing is underestimated by way of the number of total houses allowed for there will be shortage of supply towards the end of the Plan period and supply will run out;
  - c. If the Council's allocation is located in too few sites which are of a strategic nature or the ability of house builders to deliver the required allocation is prevented because of long lead-in times or provision of infrastructure or the limited capacity of house builders to build sufficient homes quickly enough the provision of new homes will not meet demand.
19. As such the Council would be prudent in maintaining a 5 year Housing Requirement for the period 2030-2035. It would be a safety valve should either of the three scenarios occur.

## **Housing Trajectory and Monitoring**

20. Added to the above requirements for a robust Housing Requirement, the Council must also provide a realistic housing trajectory that demonstrates that there is an availability of housing land in all settlements to meet housing demands for the duration of the Plan Period. It is wholly inappropriate to undertake an assessment of housing land supply which the Council has done in this case and not apply some consideration to the deliverability of the lands. The Council's Urban Capacity Study (UCS) T/S 3 Appendix 1 candidly admits that it is a 'interim' document, and it is merely an initial audit of the potential housing capacity within the Borough.
21. The implications of this 'interim' study is however, that in many cases there are sites identified that are not likely to come forward to meet housing need and yet they are included in the UCS.
22. Surprisingly paragraph 6.6 of the UCS states that amenity land is excluded, however in the case of Carrickfergus (Table 7.2 page 16) the Council include 24CS being amenity land at Oakfield Square as contributing to available housing land. There are other examples in other towns where 'open space' is included. The UCS seeks to provide as much land as possible where

there are 'no insurmountable constraints to development' (paragraph 6.10 of USC). It has no regard for policy constraints, access considerations, surrounding context, landscape value etc.

23. The consequence of this is that the Council presents the most basic Housing Requirement figure it can and the highest potential available housing land supply figure it can find to contend there is no requirement for additional housing land release. The subsequent gap between requirement and supply is wholly unrealistic. This is a disproportionate approach to the important and fundamental component of a dPS. It has the impact of giving the users of the planning process the view that there is no point in engaging in the process as there is no need for any additional lands to be provided. However, much of the draft Plan Strategy evidence base needs to be scrutinised further to ensure it is robust.

## **Housing Land Supply and Build Rates**

24. We have made the observation in our POP submission that the Council needs to seek to understand the delivery of sites within settlements. If land has been zoned for many years and has never come forward, even during the economic boom of 2007, the Council must critically consider whether there is any likelihood of it coming forward in the Plan period.
25. Equally, if lands are zoned in large parcels, it would be concerning that single house builders would simply not have the capacity to deliver adequate numbers of houses to the market. If a builder can only build 25 dwellings per annum, it is irrational that all housing land should be allocated in a limited number of land parcels in a limited number of towns. The reality of the Northern Ireland housing market is that in order to deliver housing requires a spread of housing land within and across a separate number of towns.

## **Overzoning**

26. The prescriptive approach to the rHGs and the Council pro-rata approach to its own analysis fails to provide any allowance for overzoning should in-fact the population and household growth figures prove to be under-estimates. In the same manner that the RDS HGI figures were found to be over-estimates because new Census data was available, there is also potential that when the 2021 Census is published the current population rates could be found to be inaccurate given they are based on data that is now 8 years old. The Council should have regard to the need for overzoning by a percentage of the final agreed Housing Requirement figures. In this regard we note the Council have indicated that some urban

fringe land will be zoned as phase 2 lands in large settlements. However the details of this phase 2 lands and the quantum of buildable space is unclear in the draft Plan Strategy. T/S 3 paragraph 7.35 mentions that urban fringe land has been estimated from a desk top study. This aspect of the Council's approach is unclear.

27. Generally this approach would be consistent with the tests of soundness, in that the Council are required to incorporate flexibility into the Draft Plan Strategy however the details need to be fully set out and significantly more transparent than at present.

### **Zoned Land with Planning Permission**

28. The draft Plan Strategy paragraph 5.3.20 states that in small settlements land that benefits from planning permission or has a live application that is likely to be granted planning permission will be zoned for housing and some other suitable land may be zoned. That leads to the question, what is the purpose of zoning? It appears that the draft Plan Strategy is simply confirming planning permissions instead of directing development in the future. The purpose of the LDP to secure the orderly and consistent development of land and further sustainable development. The draft Plan Strategy should provide the public and users of the planning system with confidence about what land will be available for specific uses. Zoning already approved land results in a development management lead approach instead of a development plan lead approach.

### **Social Housing Needs**

29. The Council's draft Plan Strategy identifies Social Housing Need. The LDP process is the primary vehicle to facilitate any identified Social Housing Need and the LDP needs to take account of NIHE Housing Needs Assessment. The Social Housing Need for the period 2018-2030 is 1,331. The draft Plan Strategy shows that Social Housing is not able to be provided in approved sites and that the Council are relying upon Urban Capacity Sites to come forward to meet this need. This is another example of the Council's failure to properly integrate the various component of housing demand into its overall assessment of Housing Requirement. Instead of being treated as a separate entity that can be patched on to the housing calculation and hope it gets provided in an undesignated site, the Council must include it in the overall estimates of Housing Requirement and allocate zoned land accordingly.
30. Some settlements such as Carrickfergus or Cullybackey have specific demands for social housing and when the lands identified as a Urban Capacity Sites are considered, and sites

deducted that are not likely to come forward because they are amenity space or unsuitable for any number of reasons, the result is that there is insufficient land to provide the overall Housing Requirement for the settlement.

## **Plan Objectives**

31. The Plan Strategy seeks to provide a potential of some 4,000 new jobs in the MEA area (Plan Strategy paragraph 5.4.7), however, the Council's housing calculation simply applies the now out of date DfI rHGs and makes no allowance for the Plan to provide for the needs and demands of people that seek to come into the Council area to live in order to fill the jobs that the Plan Strategy is trying to achieve.
32. The uHGs are in no way linked to an increased economic boost caused by an ambitious Plan Strategy nor the historic build rates. They do not reflect the Council's future Economic Strategy.
33. The purpose of the LDP process is to holistically look at the various scenarios and objectives of the Plan Strategy and make adequate objective allowances for each scenario to occur. For example, if one third of the 4,000 new jobs was taken up by people that wanted to move into the area, to reduce commuting, be more sustainable and achieve a better work life balance, that would equate to 1,200 new households. No account has been made for this potential inward migration that results directly from the Council's Plan Strategy and its economic assessments.

## **Why Does Accurate Housing Requirement Figures Matter?**

34. Establishing a robust Housing Requirement is a fundamental part of the Plan Strategy, and it is important to set out the reasons why and what happens if there is an under provision.
35. Landowners and house builders need to be encouraged and facilitated to provide for the MEA Housing Requirements.
36. The implications of getting the Housing Requirement wrong can be that house building and the construction industry is constrained because there is insufficient supply of land, housing land supply in settlements is inadequate which undermines the viability of settlements, towns become depopulated and are unable to support educational, health, religious and other civic services, economic output is reduced because the population is not attracted to

come into the area as there are insufficient homes in a broad selection of locations, and failure to draw people into the area will undermine the economy's ability to grow. Other impacts can be:

- a. Undermine the LDP Strategy;
- b. Undermine the Council's Economic Strategy;
- c. Increase the cost of housing in the Borough;
- d. Increase housing stress and social housing need in the Borough;
- e. Widen the affordability gap in the Borough;
- f. Increase rents in the private sector;
- g. Force outward migration; and
- h. Increase use of unsustainable transport modes with people travelling longer journeys to work given lack of locally affordable homes.

## Conclusion

37. The Council needs to:

- a. Review and take account of the Chief Planner's letter as a guide;
- b. Review the Housing Requirement methodology which is inadequate and needs to take account of a variety of factors to fully and objectively:-
  - i. include an over zoning allowance;
  - ii. provide a 5 year housing supply beyond the notional 2030 Plan end date;
  - iii. ensure social housing needs are incorporated into the calculation;
  - iv. include a robust housing land delivery trajectory;
  - v. assess realistic build rates and lead in times;
  - vi. reflect the impact of the Council's Plan Strategy Objectives;
  - vii. reflect the impact of the Council's Economic Strategy;
- c. Undertake a process where future land zoning is based on future need, not a reflection of past planning permission.

## Annex A

Chief Planner's Letter of 25 September 2019

Annex A

**Regional Planning Directorate**



Department for

**Infrastructure**

An Roinn

**Bonneagair**

[www.infrastructure-ni.gov.uk](http://www.infrastructure-ni.gov.uk)

To

Heads of Planning (Councils)

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Your Reference:

Our Reference:

25 September 2019

Dear Heads of Planning

**RE: HOUSING GROWTH INDICATORS 2016-2030**

You will be aware that the Department recently undertook an exercise to refresh the Housing Growth Indicators (HGIs) set out in the Regional Development Strategy.

The work is now complete and a 2016-based Housing Growth Indicators (HGIs) paper is attached for your information. The paper sets out revised HGIs, taking account of updated data for three of the components which previously made up the HGIs, namely updated NISRA Household Projections, new House Condition Survey data published by NIHE and more recent data from the NISRA Central Survey Unit combined survey sample. The updated HGIs cover the period to 2030, ensuring they better correspond with the timescale for the majority of Local Development Plans (LDPs) currently under preparation.

It is important to note that HGIs do not forecast exactly what will happen in the future. They are policy neutral estimates based on recent trends and best available data on households and housing stock. They assume that recent trends will continue into the future. They do not attempt to model existing policy or societal factors nor predict the impact that future policies, changing economic circumstances or other future events may have on housing requirements in LDPs. For these reasons those preparing LDPs should not regard the HGIs as a cap on housing or a target to be met.

Notwithstanding the above, as the HGIs are based on best available data, they are therefore an important starting point to guide the assessment of the overall housing requirement identified in the LDP. The SPPS identifies a range of further considerations that, in addition to the HGI, should also inform this housing allocation. These include the

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Website: [www.planningni.gov.uk](http://www.planningni.gov.uk)

RDS Housing Evaluation Framework; allowance for existing commitments; urban capacity studies; allowance for windfall housing; application of a sequential approach to site identification; Housing Needs Assessment/Housing Market Analysis and transport assessments.

Rather than accepting the HGI estimate as a target to be planned for, Councils should first consider its applicability to local circumstances in the context of the above-mentioned assessments and other relevant local evidence. This may include, for example, other Council strategies/objectives (for instance in relation to urban regeneration or economic growth); the likely impact of corresponding strategies in neighbouring councils; the capacity of existing or planned infrastructure to facilitate development; or other evidence in respect of recent build rates. This is not an exhaustive overview of the types of local evidence that may be relevant.

In summary, LDPs must aim to make provision for the housing requirement considered appropriate as a result of analysis of all relevant sources of evidence, including the HGI estimates provided by this Department. This reflects the reality that appropriate LDP housing requirements are influenced by a complex range of factors within the plan area and beyond.

Councils should now take account of this revised indicator alongside all other relevant evidence gathered to date, to justify the housing requirement in the draft Plan Strategy; depending on the methodology or approach used to arrive at this requirement, this update may have a variable impact. It is important that Council can demonstrate that they have taken this revised indicator into account. I am of the opinion that it is in the interests of both Local Councils and the Department that Plans are prepared using the most up to date estimates available. This reflects the requirement for LDPs to be prepared using a sound evidence base of which the HGIs are an important element.

Yours sincerely



**ANGUS KERR**  
**Chief Planner &**  
**Director of Regional Planning**

Encl

Cc Council Chief Executives

## Appendix B Working Paper on Plan Strategy Carrickfergus Housing Matters

### Introduction

1. This paper builds upon our Working Paper submitted in respect of the Preferred Options Paper and the Working Paper on Carrickfergus Housing Supply.
2. The Council's case for Carrickfergus Housing Requirement is based on the simple out working of the Council's adoption of the Department for Infrastructure (DfI) HGIs and applying them on a pro rata basis. There is no evidence of housing need from estate agents and no consideration of discussion with health and educational providers on the demands of the town.
3. The Council's case set out at draft Plan Strategy page 323 is that there is a Requirement for 1,239 dwellings in Carrickfergus, that there is 1,222 live approvals in the town and that there are 981 Urban Capacity Sites that can meet any future Housing Requirements not already approved, and that there is a potential 107 wind fall sites.
4. The Urban Capacity Sites are set out in Technical Supplement 3 Appendix 1 Table 7.2. Looking at these sites it can be noted that:
  - a. Site 11 CS is a large narrow site that runs between Woodburn Road and North Road. Its narrowness does not lend itself to housing land. The site was zoned in draft BMAP but a Key Site Requirement is the completion of the Carrickfergus Spine Road which requires agreement between adjoining landowners and developers. This would eat up 2.6 ha of land, which based on a dph of 25 would only suggest 272.5 units are likely. The site also requires landscaping, landscape buffer planting, flood risk assessment of open water courses, noise mitigation measures from the spine road and designed to avoid impacting on overhead lines and pylons. We do not consider it viable to develop these lands given the Key Site Requirements and it is unsurprising that no planning application has been submitted on these lands to deliver this development. If this land is unavailable the Council's land supply drops by 337;
  - b. Site 15CS is open space that has not been built for housing. If this land is not available the Council's land supply drops by 36;
  - c. Sites 19CS and 20CS are agricultural lands on the Larne Road that have been identified since 2004 for housing in dBMAP. They have never come forward and as

such the Council should not rely on these sites contributing 13 units in the next 12 years;

- d. Site 24CS is amenity space that is zoned as an area of open space in dBMAP. If this land is not available the Council's land supply drops by 6;
5. As such it can be seen that the Council's 'interim' Urban Capacity Study appears to identify lands that have been long considered as housing sites but are not available or are sites that are already designated for other uses. There is a potential that the housing supply could drop by 392 units. We also consider that lands that have shown no demonstrable progress being made should be re-zoned.
6. We therefore set out below an analysis of the Council's housing supply in Carrickfergus. In these cases we initially apply the draft Plan Strategy Housing Requirement, allocate 27% of Housing Requirement to Carrickfergus; include an allowance for 5 years over supply to 2035 and add social housing to give a total Housing Requirement in Carrickfergus of 2,343. Deducting the live approvals and the Urban Capacity Sites (1881) and windfall allowance (107) there remains a Housing Requirement of 355.

## Housing Requirement

	dPS	Method (i)
Housing Requirement	4614	7830
Carrickfergus	1239	2103
Social Housing Requirement	518	518
Total Housing Requirement	1757	2621
Over zoning to 2030	2343	3494
Live Approvals (inc realistic Urban Capacity Sites i.e. 1222+589)	1881	1881
Windfall	107	107
Residual Housing Requirement	355	1506

Note: Method (i) taken from Inaltus POP Submission and applies only Plan Requirement figure here

7. Of course these figures do not take account of the likely increased Housing Requirement for the draft Plan Strategy when a robust methodology is applied as directed by the Chief Planner. To avoid introducing further scenarios, until the Council amend their Housing Requirement figures, the above table applies this approach to the Method (i) figures

calculated by the DoE in its POP Paper 2. It shows the Housing Requirement to be 7,830, applying 27% to Carrickfergus alongside the social housing need gives a total housing requirement of 3,494. Deducting live approvals, realistic Urban Capacity Sites and windfall leaves a residual Housing Requirement of 1506.

8. It is worth noting here that even if the Council contend that there is Urban Capacity Sites that can meet this need, there is a requirement to provide a 5 year housing land supply trajectory to determine when such lands could in fact be developed. In Carrickfergus, the Council are relying on 4 large sites of between 127 and 432 units to meet housing need. These sites would have significant planning timescales for permission and significant infrastructure works to be provided before they could be said to be contributing to housing land supply pipeline.
9. We therefore consider that a realistic assessment of both Housing Requirement and housing supply in Carrickfergus results in a requirement to zone additional lands to accommodate at least another 300 dwellings and potentially 1500 dwellings. Our client's lands at Trailcock Road can provide for circa 70-90 units.

## Mid and East Antrim Local Development Plan 2030

### Response to POP Paper

Ref: 16/11 (20)

Client: NK Holdings Ltd

1. We make this submission on behalf of NK Holdings Ltd. NK Holdings Ltd own lands at Trailcock Road within the settlement of Carrickfergus, which are zoned as a Major Area of Existing Employment/Industry. The lands are accessed along a narrow single lane taking its access from the housing area of Trailcock Road. The lands are located behind the housing areas of Lennox Drive and Regent Avenue.
2. New access is available to land lands from Regent Drive, which would facilitate reuse of this site for housing development. Reuse of the lands for housing would also support the future growth and expansion of NK Fencing from a more suitably located industrial development on the outskirts of Carrickfergus.
3. Our clients therefore request that the lands outlined at **Annex A** are retained within the settlement limit of Carrickfergus and rezoned for housing use. This submission is also accompanied by **Annex B** - Working Paper on Housing Matters

#### ***Q.2. Do you agree with our LDP Strategic Objectives?***

4. We consider the objectives are not ambitious enough. Social Objective D should be replaced by the following *“to significantly boost the supply of housing in the MEA by delivering a rolling 5 year supply of housing and delivering 12,000 new homes in the MEA area by 2030 in a broad variety of locations to meet future housing need”*.
5. Economic Objective B is not precise enough. It should quantify the amount of new jobs that will be created before the end of the Plan period. The POP suggests scope to provide 8,250 new jobs over the Plan period. This scale of jobs should be included in the objective,

to ensure that the Plan and indeed the Council are accountable and drive the economic growth of the area.

***Q.4. Do you agree with our preferred option to securing developer contributions from landowners and/or developers?***

6. Our clients do not oppose developer contributions and welcome a policy to ensure that applications and investment are welcome. An appropriately worded policy would ensure that all developments are subject to the requirement, and the investment should not be left to the housing and economic sector. We agree with Option 1 (a).

***Q.5. Do you agree with the Preferred Option for Our Settlement Hierarchy?***

7. We agree with the growth strategy insofar as it includes Carrickfergus as a Main Town.

***Q.7. Do you agree with our Preferred Option for allocating housing growth across the Borough?***

8. We disagree with the Preferred Option and consider that 65% of new housing allocation should be in the Main Towns.

***Q.8. Taking Account of the HGI for the Borough, our proposed housing allocation strategy and existing commitments do you think there is: sufficient/insufficient/too much land zoned for housing?***

9. We consider there is insufficient land zoned for housing. At present the housing allocations fail the test of soundness as they are not based on robust evidence and are not realistic and have not considered appropriate alternative scenarios.
10. We **disagree** with the adoption of the revised HGIs of 6,230 for the MEA over the Plan period. We set out at **Annex B** why we consider the housing figures to be too low and why there is a need to be more flexible to allow for increased housing. We consider the Council should be planning for circa 12,000 new homes in MEA during the Plan period.
11. We go further and consider our clients lands at **Annex A** should be used for housing.

12. At present the housing allocations fail the test of soundness as they are not based on robust evidence and are not realistic and have not considered appropriate alternative scenarios.
13. We would be keen to have discussions with the Council on the approach to reach a more robust housing allocation, based on up to date and reliable evidence.

***Q.9 Do you agree with our suggested approach to developing the LDP Economic Development Strategy?***

14. We would endorse the delivery of 8,250 jobs in the MEA over the Plan period. However there is more suitable lands for the provision of industrial development elsewhere in Carrickfergus that has better access and is more compatible with surrounding land uses than our client's site. There is no requirement in the Plan to retain our client's land for industrial use, and it would be more appropriately zoned for housing.
15. The POP (page 74) states that there is 76ha of industrial land in Carrickfergus and that there may only be a requirement for 9ha in Carrickfergus over the Plan period. There is therefore a surplus of 67ha in Carrickfergus. Loss of our client's land which extends to circa 3 ha (7.2 acres) would not undermine the supply of adequate industrial land in Carrickfergus.

***Q.30 Do you agree with our approach to retaining current BMAP areas of Potential Subsidence and assessing if there are any other known areas of potential subsidence within the Borough that should be identified and designated as new area of Potential Subsidence?***

16. We disagree. The Council should carry out its own review of all areas of subsidence and not rely upon designations in BMAP that date back 17 years to when BMAP was first being drafted.
17. Some areas of previously potential subsistence may have been filled in and are no longer at threat of subsidence and are safe to build on. Where such cases occur, and land is found safe for construction the land should be released for new uses. In order to maximise the best use of brownfield sites, it is necessary to be thorough in assessing land suitability and avoid sterilising lands unnecessarily.

**Other Matters**

18. We would request that the Council give consideration to inclusion of these lands within the settlement of Carrickfergus and to be zoned for housing development.

**Annexes**

- A. Site Map
- B. Working Paper on Housing Matters

Annex A - Site Map



## Annex B - Working Paper on Housing Matters

### Revised Housing Growth Indicators

1. The Council's reliance on the revised HGIs (rHGIs) produced by DRD (now endorsed by DfI) need to be treated with caution. The rHGI's have not been subject to public consultation and examination.
2. The rHGIs are a dramatic reduction in the HGIs produced for Northern Ireland in 2001 under the RDS 2025; also revised in March 2006 following a review of the HGIs; and a dramatic reduction in the HGIs for Northern Ireland set out at Table B2 of the RDS 2035.
3. It is not clear precisely how the DRD reached the rHGIs. A paper has been produced to explain some of the background methodology, but it accepts that there have been differences in data sources and that the information is incomplete in some respects.
4. The rHGIs across NI are dramatically reduced from earlier estimates. This is shown as follows:

<b>RDS 2025</b>		
HGI 1998-2015	160,000	9412 units / annum over 17 years
Uplifted in 2006 to	208,000	12,235 units / annum over 17 years
<b>RDS 2035</b>		
HGI 2008-2025	190,000	11,176 units / annum over 17 years
<b>Revised RDS 2035 (2012)</b>		
HGI 2008-2025	128,200	7,541 units / annum over 17 years

5. This shows that the global rHGI figures produced in March 2015 for Northern Ireland has dropped by a third since 2012 (when the RDS 2035 was published). The position for Mid and East Antrim (MEA) is actually much worse as it drops by 50%<sup>2</sup>. This dramatic change in a 3 year period without any public consultation lacks robustness that the process requires.

<sup>1</sup> It is unclear why the Revised Paper Appendix 2 on page 189,500 dwells when the RDS clearly notes 190,000

<sup>2</sup> See Addendum to Housing & Settlement Paper April 2016 Section 6

6. The rHGI figures have changed as a consequence of data that has been produced in 2011, when the most recent Census was undertaken.
7. This Census was taken at the height of the recession in Northern Ireland. During a recession household formation rates are often lower, and household sizes are larger because of uncertainty over jobs and difficulty in lending. The rHGIs do not provide any commentary on the reasons behind why the figures might have dropped in the short period of 3 years from the publication of the RDS in 2012 and the rHGIs in 2015. Either the 2012 figures had an inbuilt allowance that reflected the recessionary times they were prepared in or the rHGIs have an inbuilt allowance. Simply applying the source data without interrogating the information would make the information overly pessimistic. The rHGI Paper (page 4) states that the downward pressure on household projections was noted in other UK countries. Our experience in England, acting for a local authority, is the opposite of this and we would challenge this assumption.
8. Census data in respect of usually resident population is not provided or explained in the paper. It only counts household formation rates. The RDS 2035 (page 17) estimates that by 2023 Northern Ireland population would be 1.946 million. Current predictions below show that Northern Ireland population is likely to be 1.939 million by 2024, a reduction of about 7,000. This is only a 0.36% decline in population. It does not point to a reduction in housing need in Northern Ireland of a third by 2025. The rHGIs presents the proposition that the 94,000 rHGI figure is an optimistic view, and that 70,900 might have been used<sup>3</sup>. This is even more unrealistic given the limited changes in the population projections.
9. It is also noted that RDS 2025 (page 112) considered the Northern Ireland population would grow from 1.689 million in 1998 to 1.794 million in 2015 (a growth of 6% over 17 years). This was the underlying population that supported a HGI then of 160,000. The Table below shows a growth of 6.8% between 2014 and 2029 (over 15 years). We are unconvinced that the rHGIs are robust and must be carefully considered by the Council.

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<sup>3</sup> 2012 2025 figures.

Table 1: Estimated and projected population of the United Kingdom and constituent countries, mid-2014 to mid-2039

	Millions					
	2014	2019	2024	2029	2034	2039
Un ted						
K ngdom	64.596752	66.927765	69.036245	70.988943	72.720866	74.284443
Eng and	54.316618	56.466327	58.396289	60.188029	61.800146	63.281523
Wa es	3.092036	3.139383	3.186839	3.230968	3.261529	3.280122
Scot and	5.347600	5.427982	5.514402	5.595826	5.658708	5.701476
Northern						
Ire and	1.840498	1.894073	1.938715	1.974120	2.000483	2.021322

Source: Off ce for Nat ona Stat st cs

Notes:

1. Figures may not sum due to round ng.

10. Similarly, the loss of housing stock through conversion and closures is tainted by data that was recorded during the recession, when the development industry was depressed. The more recent figures of 1,000 dwellings per annum are the beginning of the market recovery, and not reflective of a normal operating market. This is 1,000 below the RDS 2035 and 700 below the RDS 2025 assumption. A more realistic figure would be between 1700 and 2000.
11. The figures of housing need should be more optimistic, as the recessionary trends or post recessionary trends are not likely to continue and are not likely to be reflective of MEA during the Plan period up to 2030 and beyond.
12. Whilst Councils are required to have regard to rHGs, they can also with justification adopt different figures. In fact, alternative approaches are a key component in the Plan making process as set out in Practice Note 06 (para 5.510). The SPPS requires LDPs to be informed by RDS HGIs, and that they are a guide, however the SPPS also requires a minimum of 5 years housing supply. The rHGs are plainly at the lowest end of the scale and are the starting point for carrying out an objective assessment of need. Our view is that the Council have very good reason to significantly exceed the rHGI figures.

### **The Councils Topic Papers**

13. The Council has three key Topic Papers (TP) TP 1 Population and Growth, TP 2 Housing and Settlements and TP 13 Housing Allocation. The first two are comprehensive documents prepared in 2014 by the then DOE. Both were drafted planning for population growths and housing requirements consistent with the 2012 RHI figures. Both documents (supported by TP 13) have been dramatically and bluntly revised to ensure their baseline data reflects the cuts in the rHGs. No interrogation is provided as to why the figures should be so dramatically reduced. The documents blindly accept the NISRA projections.
14. Some of the information contained in the amended TPs (such as house price data para 5.14) fails to acknowledge that in 2011 until 2015 Northern Ireland was either in a recession or in a post recessionary period. Section 6 of the update to the Need for Additional Housing Stock merely observes the predicted dramatic reduction in household formation rates. It does not make any analysis of the other assumptions applied in the rHGI figures or the rHGI paper. It does not consider the assumptions applied to second homes, vacant stock, net conversions. To be robust the Council should set out clearly how robust it considers the rHGI approach of DfI is in respect of the MEA and provide the evidence base to support it.
15. It is unclear what evidence of population growth distribution is being anticipated. TP 1 para 2.3 observes that Ballymena population growth exceeded the NI average and that Larne and Carrickfergus were lower than the NI average. TP 1 also notes that NISRA publishes its projections every two years, the next release will be 2018. Given the dramatic reduction in projections it must be more practical to look at longer term trends and to examine the new release of projections in 2018.
16. The lack of interrogation is further illustrated by para 6.2 of TP 2, where in the Council sought to decide if the 2012 HGIs were constraining growth and set out two separate methodologies to determine household need. The first found there was a need for 11,880 units between 2008-2030 (an annual requirement of 522 units), the second found a need for 12,567 (an annual requirement of 571 units). These approaches were independent of the HGIs.

17. House building declined dramatically between 2008 and 2015 and an allowance would need to be made for the backlog in housing requirements. The Housing Allocation Topic Paper 13 Table 1A shows the completion rate between 2012 and 2016 to be 794 for MEA, which equates to 198.5 over that 4 year period. That is 1295 (62%) less than the required housing growth of 2089 over that period according to the above first methodology.
18. There is a very real potential that there is a backlog in housing demand, caused by the recession, and these figures are not factored into the Council's housing need.
19. Overall the approach to the adoption of the rHGs is unsatisfactory. It is also worth observing that other Council areas do not adopt the rHGs at all and others apply flexibility in them using them as a guide.
20. The Council's TP 13 notes that the DRD/DfI allow flexibility in the use of the HGIs, but the Council have declined to incorporate flexibility because they consider the NIRSA household projections to be low and there appears to be an oversupply of housing land. While the need and supply are two important factors in delivering adequate housing, the two should not be confused. In order to reach a housing need figure the statistical analysis should be carried out in full, in an appropriate methodology. It should also be linked to other aspects and aspirations of the Plan. If there is a significant economic growth objective in the Plan (which there is in this case) inward migration should be a factor that is included in the housing need. Similarly the need for second homes and conversions should be considered.
21. The DfI rHGs do not reflect wider MEA Plan issues and consequently they must be treated as a baseline and not a set figure.
22. The Council should re-examine the need for flexibility in the rHGI.
23. Simply relying on rHGs because there is committed land for 12,644 units is wholly unsound as the POP acknowledges that only 8,390 of these units are realistic (page 68).

#### **The POP**

24. The POP itself (page 32) helpfully points out that population in the Plan area will increase by 3.6% by 2030, and that the population is aging. Overall the number of elderly is a key

factor in declining average household size. It states that the Plan will take account of the implications of these trends for example in the delivery of appropriate housing.

25. However, these trends are factors that must be accounted for now in the estimate of housing needs. The POP adopts, without interrogation, the dramatically reduced rHGs. If the implications of reduced household formation rates have not been already considered in the rHGs the adoption of them is flawed. It again illustrates further the requirement for the Council to assess the rHGs as part of the Plan process and ensure that robust housing requirement figures are adopted.

#### **Build Rates and Availability of Land**

26. The Council's TPs and evidence base should be considering in more detail migration rates and growth scenarios that might influence demand, and factors that influence supply of housing including build rates, release of land zoned for housing, land that has been zoned for housing and has not been released, where demand is greatest, lead in times, delivery of 5 year housing land supply, the need to make up the backlog of reduced housing supply in recent years, providing for latent demand, and demands of an ageing population.
27. The consequence of not understanding the lead-in times and deliverability of the existing zoned housing land will have serious negative ramifications for the Council area in the coming decades. A persistent shortfall in supply in England would warrant a 20% buffer to be included in any objective assessment of housing need. It is our view that the Council should be proactive and seek to add a 20% buffer to the housing figures and that these should be delivered in the first five years of the Plan.

#### **What is the Housing Demand in The Council Area?**

28. The Topic Papers simply do not provide adequate transparent evidence to support any justification for housing requirement or demand for the Plan period.
29. As mentioned above, these rHGI figures have not been tested in the public domain. There is no analysis of how realistic the figures for MEA are. We understand that the Council did not provide any comments to the draft figures when they were provided to them.

30. Clearly the allocation of the new rHGs for MEA is dramatically worse than what was anticipated in the previous HGIs. The Council were anticipating the area would have a HGI in the region of 18,117 between 2008 and 2030 (TP 2 Table 6.1). The rHGs are 41% of this allocation (7,477 between 2008 and 2030).
31. No analysis is given in the evidence or indeed the POP as to the rational for such a reduction, the implications that the rHGI figures are unrealistically pessimistic and what the implications for the role and function of the new Council area are.
32. It is difficult to agree that one of the strongest Council areas in Northern Ireland, which is strategically located on the main highway networks, has a key port town, has key energy infrastructure, has major tourism industry and in Ballymena has one of Northern Ireland's strongest towns, should be faced with curtailed growth to such a degree, based on a single set of rHGI figures, which appears to contradict long term trends of the past.
33. The Council does not provide any flexibility in the POP of potential housing need. However, applying its own figures set out in the TPs and POP, the following scenarios might arise as a baseline.

Basic Housing Requirement (excluding allowances for economic growth second homes etc)			
	rHGs	Method (i)	Method (ii)
Annual Requirement	415	522	571.23
Period Requirement	6231	7830	8568
Backlog	1295	1295	1295
20% Buffer	1505	1825	1973
<b>Total</b>	<b>9031</b>	<b>10950</b>	<b>11836</b>

### Monitoring

34. The Council should produce a housing trajectory for the Plan period to demonstrate how it intends to deliver the necessary housing over the Plan period to ensure the Council's performance can be measured and monitored and to ensure there is no shortage of housing supply and that the negative societal and economic consequences that that could cause can be avoided.

### Housing Supply

35. The evidence presented at TP 13 Appendix A sets out the remaining land for housing in various settlements. It shows that there is 12,644 units available in MEA, but provides no analysis of the likelihood of this land coming forward for development. Simply being allocated does not mean lands will contribute to a 5 year housing supply over the Plan period. If lands are controlled by one house builder, they can only build about 25 units per year. Hence reliance on large single builder sites can be problematic for the local housing market. The Council must provide more detailed explanation of the availability of these lands. As mentioned above, the POP acknowledges that only 8390 units are realistic on the existing sites.
36. Hence, even at this early stage in the Plan there is a potential requirement of between 9,000 and 12,000 units and a supply of just over 8,000 units. The Council therefore needs to be more realistic in its estimates of both housing requirement and land allocation to ensure the Plan is sound and robust for the entire Plan period.

### Conclusion

37. The Council's TPs need to:
- a. Review clearly the population projections and household formation rates to ensure they are consistent and up to date and reflect long term trends;
  - b. Set out what the implications of the dramatic reduction in HGIs might have for the Plan and what the Council propose to do to ensure that its growth strategy is achieved;
  - c. Set out how the needs of the aging population will be accommodated over the Plan period;
  - d. Set out the scenarios of how economic growth will impact the demands for housing in the area;
  - e. Assess the projected household formation rates at a local level and not arbitrarily accept the household formation rates applied in the rHGI, particularly when the evidence shows that MEA will have lower household sizes in future;
  - f. Set out a range of scenarios based on household formation rates, properly interrogated to reflect the recessionary trends in household sizes, net conversion

and to factor in additional housing need to attract inward migration to support and sustain the Council's economic growth strategy;

- g. Provide a transparent and robust housing trajectory to demonstrate how the housing needs of the MEA will be provided annually to facilitate monitoring and identification of issues in meeting housing needs to avoid overheating of the housing market; and
- h. Set out how the Council intends to address the already existing backlog of housing which should be addressed during the first 5 years of the Plan.

38. The foregoing comments inform our views on the approaches to the housing issues set out in the POP.