

**MID AND EAST ANTRIM LOCAL DEVELOPMENT PLAN
2030**

Draft Plan Strategy Response

Lands at Shore Road, Greenisland

Rosemount Homes

December 2019

Spatial Growth Strategy - A Representation to **Mid and East Antrim's** Draft Plan Strategy (Local Development Plan 2030)

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1. Introduction

- 1.1 This representation has been prepared by TSA Planning on behalf of our client Rosemount Homes in respect of Mid and East Antrim Borough Council's published Draft Plan Strategy (DPS), for their Local Development Plan 2030.
- 1.2 The paper assesses the Spatial Growth Strategy (Section 5.3; Policy SGS 3 and Policy SGS 5) and Policy HOU5 within the Draft Plan Strategy including the associated amplification text which we believe is unsound in its current form.
- 1.3 Section 2 of the paper analyses Section 5.3 and associated text of the DPS, in relation to the housing growth figure over the plan period. The section sets out why we currently believe these to be unsound, the appropriate evidence and changes required to ensure the DPS is sound.
- 1.4 Section 3 relates to Policy SGS3 and the allocation of housing growth to individual settlements, and associated justification text.
- 1.5 Section 4 analyses Policy SGS5 in relation to the management of housing supply.
- 1.6 Section 5 reviews potential housing lands within Greenisland.
- 1.7 Section 6 sets out Conclusions in respect of this representation.
- 1.8 We respectfully request this representation is heard by oral hearing at Independent Examination stage.

2. Section 5.3 Strategic Housing Allocation Strategy and Paragraphs 5.3.4 and 5.3.5

2.1 Summary

- 2.1.1 Given our previous concerns at POP stage relating to the method of basing housing growth on the revised down HGI figures published in 2016, we remain concerned that these have been brought forward as the sole basis for housing growth over the plan period. As such we believe the current housing growth figure is unsound for the reasons identified at **Table 1** and our detailed response below.

Table 1: Summary of Relevant Soundness Tests

<i>Soundness Test P1 – Has the DPD been prepared in accordance with the Council’s timetable?</i>
The Council produced a revised Timetable in April 2019. The publication of the Draft Plan Strategy and its consultation period is currently running c. three months behind schedule.
<i>Soundness Test C1 – Did the Council take account of the RDS</i>
Policy RG 8 of the RDS requires an <i>adequate and available</i> supply of quality housing to meet the needs of everyone. In its current form, the housing growth figure does not provide for an adequate supply of housing. Furthermore, the HGI figures published in 2016 have been used as a rigid framework and not a guide, contrary to the direction set out in the RDS.
<i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i>
The SPPS requires the maintenance of a 5 year supply of deliverable housing land during the lifetime of the plan which could be unachievable under the current Draft Plan Strategy. The strict adherence to Housing Growth Indicators has not taken account of guidance issued by the Department which states other relevant local evidence should be taken into consideration when determining housing growth.
<i>Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow</i>
The inflexible nature of the current housing growth figure has the potential to result in contradictions between the Draft Plan Strategy and Local Policies Plan when designating housing land. Whilst it is stated that the figure of 7,477 dwellings is an estimate, the method of allocating the growth and the associated policy content does not make allowances for any additional housing growth over this figure outside of affordable housing provision. This essentially means that it is a cap on housing growth.
<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i>

The current housing growth figure is not realistic or appropriate when considering historic build rates across the Borough
<i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i>
The identified housing growth figure of 7,477 dwellings does not allow for a probable delay in the adoption of the Plan which could hinder the Council's ability to review and amend the Plan prior to 2030. This is particularly important when the evidence shows annual build rates from 2015-2018 are already exceeding the annual HGI figure which has been used to inform the housing growth figure.

2.2 Detailed Response

Plan Timescales and Monitoring

- 2.2.1 The current housing growth figure of 7,477 dwellings is too restrictive when considering the LDP timetable and any potential change in circumstances prior to the adoption of the Local Policies Plan. We note within Appendix A of Technical Supplement 1 Monitoring and Review (TS1), the Council indicates that in respect of ensuring a sufficient supply of land for housing they aim to ensure that a sufficient number of dwellings are built and sufficient land remains in individual settlements to meet the Strategic Housing Allocation. A review will be triggered if less than a 5 year supply of land is available in an individual settlement to enable its allocation to be met. We will discuss the soundness of the Council's Strategic Housing Allocation in **Section 3**, however, we believe that the 5 year land review should, in the first instance, be considered in respect of the strategic housing growth for the whole Borough and then individual settlements at a secondary stage.
- 2.2.2 In their response to the Antrim and Newtownabbey Preferred Options Paper, DfI stated "*The SPSS provision relating to the maintenance of a 5-year supply of land for housing is to ensure that, within the lifetime of the plan, there is always a 5-year supply of genuinely deliverable housing land available. Council should ensure that the plan incorporates monitoring provisions to ensure that this supply is maintained, and the plan reviewed, should monitoring conclude that the housing supply falls below this threshold*".
- 2.2.3 The provisions set out by Mid and East Antrim Borough Council are not adequate or realistic to ensure there is always a 5-year supply of genuinely deliverable housing land available. We note that according to the Council's revised Timetable (April 2019), the Local Policies Plan is due to be adopted at Q4 2022. However, the publication of the Draft Plan Strategy and consultation period is currently c.3 months behind schedule, 7 months after the publication of the revised timetable. Furthermore, when compared to the LDP Timetable published in 2016,

the publication of the Draft Plan Strategy is 29 months behind the anticipated date (April 2017). Whilst we appreciate that the original Timetable is no longer relevant, it provides significant evidence in illustrating the potential delays which can be experienced in the preparation of Local Development Plans. We therefore feel it is reasonable to anticipate that the full adoption of the Plan will be further postponed past the December 2022 timeframe. This could result in less than 5 years between the adoption of the Plan and the end of the Plan period. Given these delays, and therefore the limited time for review and amendment of the Plan prior to 2030, we believe it would be appropriate to include a housing growth figure to 2033 to allow for adequate flexibility and time to review in the event of a newly amended timetable. This is an approach **which has been taken by a number of Council's who are at a similar stage in the preparation of their Local Development Plan** including Belfast City Council, Lisburn and Castlereagh City Council and Derry City and Strabane Council.

- 2.2.4 Furthermore, the Council have identified a housing growth figure starting at 2012. Paragraph 1.1.3 within the Introduction of the Draft Plan **Strategy states that "the Council has prepared this LDP document, the draft Plan Strategy (hereafter referred to as the draft Plan Strategy) for the period 2015-2030". Therefore, calculating a housing growth figure starting at 2012 is inconsistent with the start of the Plan period and should be amended to correspond with same.**

Housing Growth Figure

- 2.2.5 In respect of the stated Housing Growth Figure of 7,477 dwellings from 2012 to 2030, this number is significantly constrained in respect of meeting the needs of the Borough. Within Para. 5.3.5 of the DPS the Council identify the following:

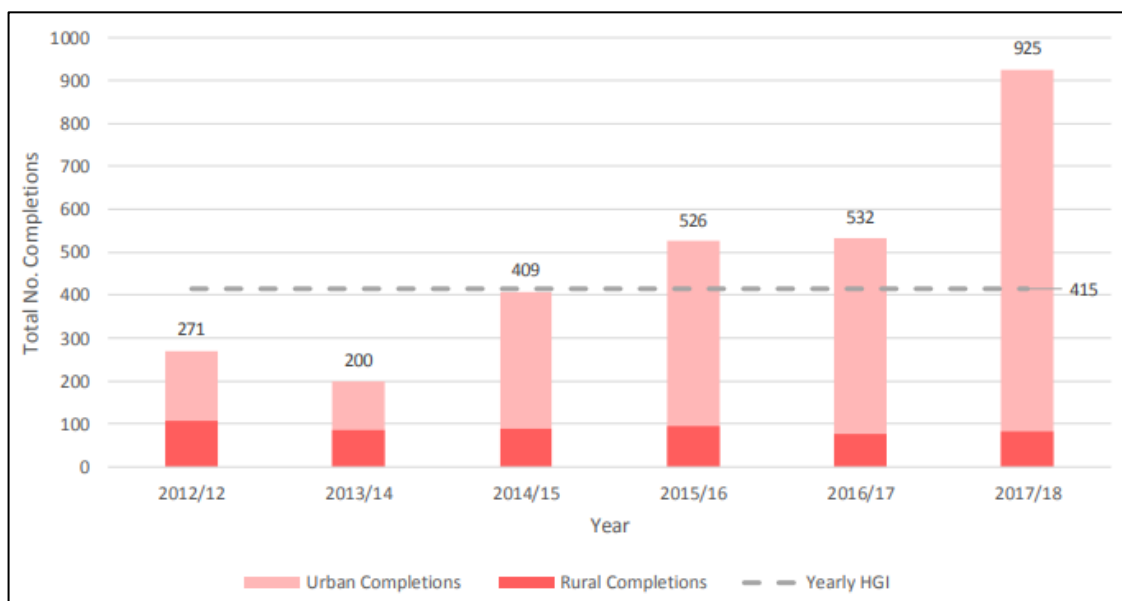
"This allocation is based on the prevailing Housing Growth Indicator (HGI) for Mid and East Antrim at April 2019, which for the period 2012-2030 constitutes 7,477 dwellings. Whilst acknowledging that the HGI is an estimate of the new dwelling requirement for the Council area over most of the Plan period; Council accepts that the figure is nevertheless based on the best available evidence, largely related to anticipated household formation and finds no sound reason for departing from it."

However, the HGI figures are not only an estimate, but as identified within RG8 of the RDS 2035, the figures are guidelines for local planning and are not to be seen as a rigid framework. This was reinforced by the Department for Infrastructure in their letter to Heads of Planning, dated 25th September 2019, in respect of Housing Growth Indicators (See Annex 1). Within the correspondence, the Department states that rather than accepting the HGI as a target to **be planned for, Council's should first consider it's applicability to local circumstances in the context of relevant assessments and other local evidence.** This may include other Council

strategies/objectives; 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.

2.2.6 Within Para. 7.7 of Technical Supplement 3, the Council state that the [HGI] figures are based on current population/household formation trends making the assumption that these trends will continue in the future. Through solely basing housing growth on the published HGI, the Council is placing too much weight upon current population/household formation trends and as such does not allow **flexibility for any change in circumstances. As such, using the HGI's as a guide, other factors should be taken into consideration when setting out a housing growth figure for the Borough.**

2.2.7 Figure 7.3 of Technical Supplement 3 Housing sets out the urban and rural completions from 2012-2018 (see TSA 1) and as shown, completions from 2014 to 2018 have been equal to or above the annual HGI figure of 415 dwellings. This is particularly pertinent as the HGI figure used by the Council is based upon 2012 household figures. **Therefore, the Council's housing growth figure is not based on a robust evidence base and is inappropriate.**



TSA 1: Figure 7.3 of Technical Supplement 3 – Housing (Urban and Rural House Completions 2012-2018 in Comparison to Yearly Average 2012-2030 HGI)

2.2.8 The housing growth figure has informed growth allocations for individual settlements and in turn will provide the basis of designating housing land within the Local Policies Plan. Given that the Draft Local Policies Plan is not estimated to be published for another 2 years (and this could be subject to significant delay), there is a risk that a change in circumstances between the adoption of the Plan Strategy and the designations within the Local Policies Plan could result in

the housing growth figures for settlements being inadequate. **Table 2** below sets out the remaining years of potential house building (from 2018) in each settlement, should current build rates continue.

Table 2: DPS Allocations in relation to historic build rates

Settlement	Adjusted HGI 2012-2030 following application of HEF	Housing Allocation Minus 2012-2018 completions	Average Build Rate 2012 - 2018	Years Remaining at Average Historic Build Rate
Main Towns				
Ballymena	1791	991	133	4.5
Carrickfergus	1667	1239	71	17.5
Larne	1178	879	50	17.5
Total	4636	3109	255	12
Small Towns				
Greenisland	357	96	44	2
Whitehead	222	218	0.6	363
Ahoghill	192	94	16	6
Broughshane	176	67	18	4
Cullybackey	175	110	11	10
Total	1122	585	90	6.5
Villages				
Kells/Connor	135	72	11	6.5
Carnlough	93	83	2	41.5
Ballycarry	85	58	4.5	13
Portglenone	81	45	6	7.5
Ballystrudder	62	34	4	8.5
Ballygalley	45	38	1	38
Glynn	40	39	0.2	195
Glenarm	35	34	0.2	170
Cargan	32	16	3	5
Martinstown	16	-16	5	0
Clough	12	12	0	-
Total	636	415	36	11.5
Small Settlements				
Small Settlements	187	142	7.5	19
Total	187	142	7.5	19

2.2.9 As previously identified, we will discuss our response to specific settlement allocations in **Section 3**. However, the above Table illustrates that basing housing allocations on such a restrictive overall housing growth figure may result in a significant shortfall of housing lands across a number of settlements. This is most prevalent in the Small Towns of Greenisland,

Ahoghill, Broughshane and Cullybackey which, as Tier 2 settlements, represent sustainable locations for future housing development. Should the allocation of housing lands in these settlements be overly restrictive this could significantly hinder the provision of infrastructure and services, which are supported by housing growth as identified by the Council in Para. 5.3.1 of the Draft Plan Strategy.

2.2.10 Within their Draft Plan Strategy, Antrim and Newtownabbey Borough Council took an average of historic build rates and the HGI figure published in 2016 in order to calculate the overall housing growth figure. Within their Evidence Paper 6: Housing, Antrim and Newtownabbey Council stated that this methodology had been used as it considers that the HGI annual figure was framed within the context of more depressed economic conditions and therefore considers it to be too low. We find Antrim and Newtownabbey Council's justification to be sound.

2.2.11 We appreciate that future housing growth cannot be solely based upon historic build rates. However, given the current rate of housebuilding across Mid and East Antrim, we feel it would be prudent for the methodology used by Antrim and Newtownabbey Borough Council to be used within the Mid and East Antrim Draft Plan Strategy, as set out in **Table 3** below.

Table 3: TSA Revised Housing Growth Figures

Mid and East Antrim Annual HGI Figure	415
Mid and East Antrim Average Annual Build Rate 2012-2018	477
Average of HGI and Build Rate	446
Housing Growth over Plan Period 2012-2030	8,028
Housing Growth over Plan Period 2015-2030	6,690
Housing Growth over Plan Period 2015-2033	8,028

2.2.12 Whilst we acknowledge that it is the role of the LDP to promote sustainable development and direct housing growth towards the most suitable locations, the restricted housing growth figure will result in the curtailment of future housing in locations which are most sustainable and appropriate. As such, the flexibility afforded by the increase in overall housing growth will also allow for any change in circumstances over the Plan period such as changes in household formation, the continued increase in housing needs or variation in market demands.

2.3 Changes to the Draft Plan Strategy

2.3.1 Based upon the above commentary, we respectfully suggest the following amendments are made to ensure the Plan Strategy is Sound, as detailed in **Table 4**.

- *Amendment 1:* Amend Local Development Plan date to 2033 and amend housing growth figure to begin in 2015 as per the LDP Plan Period; and
- *Amendment 2:* Amend the overall housing growth figure within Para. 5.3.5 to at least 8,028.

Table 4: TSA suggested changes in relation to tests of soundness

<i>Soundness Test P1 – Has the DPD been prepared in accordance with the Council’s timetable?</i>
Amendment 1 allows for any delay in the LDP adoption date and timetable revisions, taking into consideration current delays.
<i>Soundness Test C1 – Did the Council take account of the RDS</i>
Amendment 2 provides for an adequate supply of housing in line with the RDS.
<i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i>
Amendment 1 will ensure a 5 year supply of deliverable housing land is maintained throughout the Plan period. Amendment 2 will ensure an adequate and available supply of quality housing to meet the needs of everyone in line with the SPPS.
<i>Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow</i>
Amendment 2 will ensure that the Plan Strategy and Local Policies Plan are consistent and logical in their approach.
<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i>
Amendment 2 will ensure that the Strategy, Allocations and Designations are realistic and appropriate, founded on a robust evidence base.
<i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i>
Amendment 1 allows reasonable flexibility for changing circumstances between the adoption of the Plan Strategy and Local Policies Plan.

2.3.2 We will assess how housing growth should be allocated across settlements within the **Section 3**.

3. Policy SGS3 Strategic Allocation of Housing to Settlements and Associated Text

3.1 Summary

- 3.1.1 Housing allocations within the Draft Plan Strategy have been calculated taking consideration of the spatial growth strategy, household figures at 2011 and the Housing Evaluation Framework set out in the RDS. Whilst in general we welcome the Council's methodology and agree that the above-mentioned factors should form part of the Council's consideration, we feel the Draft Plan Strategy is currently unsound based upon the reasons set out in **Table 5** and the detailed response below.

Table 5: Summary of Relevant Soundness Tests

<i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i>
The SPPS identifies that Councils should ensure an adequate and available supply of quality housing to meet the needs of everyone and provision of mixed housing development with homes in a range of sizes and tenures. Within the Draft Plan Strategy the suggested allocations to settlements will not ensure an adequate supply of quality housing.
<i>Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow</i>
The consideration of housing completions from 2012-2015 within the final housing allocations are not coherent with the Plan period which starts at 2015.
<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i>
Housing allocations are currently unrealistic and inappropriate when considering all available evidence, particularly historic build rates within individual settlements.
<i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i>
The allocations within the Draft Plan Strategy are currently too restrictive in respect of Greenisland when considering its size and potential changing circumstances.

3.2 Detailed Response

- 3.2.1 Whilst we welcome that housing allocations between settlements have been set out in line with the Spatial Growth Strategy, the housing evaluation framework of the RDS and the percentage of households in each settlement at 2011, we believe that further factors should be considered in order to ensure allocations are both realistic and appropriate.

Uplifted Housing Growth Figure

- 3.2.2 In line with our recommendations set out in **Section 2**, housing allocations within settlements should be increased in line with a housing growth figure of 8,028 dwellings and should run from 2015-2033, in order to ensure consistency within the Plan Strategy. Using the methodology set out by the Council (including the HEF adjustment), our amended allocations at this point are identified in **Table 6** below. Detailed calculations are appended at **Annex 2**.

Table 6: TSA Revised allocations based on a housing growth figure of 8,028 dwellings

Settlement	DPS Allocation (2012-2030)	TSA Allocation (2015 to 2033)
Main Towns		
Ballymena	1791	1923
Carrickfergus	1667	1789
Larne	1178	1265
Total	4636	4977
Small Towns		
Greenisland	357	383
Whitehead	222	238
Ahoghill	192	207
Broughshane	176	189
Cullybackey	175	187
Total	1122	1204
Villages		
Kells/Connor	135	145
Carnlough	93	101
Ballycarry	85	91
Portglenone	81	87
Ballystrudder	62	67
Ballygalley	45	49
Glynn	40	40
Glenarm	35	38
Cargan	32	35
Martinstown	16	17
Clough	12	14
Total	636	684
Small Settlements		
Small Settlements	187	201
Countryside	897	962

Flexibility

- 3.2.3 Table 5.4 of the Draft Plan Strategy sets out the Strategic Allocation of Housing to Settlements 2018-2030. As identified within Table 2 of this response, the remaining allocation in some settlements is too restrictive when considering build rates over the past six years. This has the potential to stymie appropriate growth in some settlements which represent sustainable locations for housing. For example, Whitehead has a remaining allocation of 218 dwellings (2018-2030) but has not experienced a high level of housing growth in recent years, with an average of 0.6 dwellings built per annum from 2012 to 2018. Conversely, Greenisland has a remaining allocation of 96 no. dwellings but has an average build rate of 44 dwellings per annum. As such, settlements which have experienced a high level of housebuilding are effectively penalised, but may represent more appropriate and sustainable locations for housing.
- 3.2.4 We appreciate that it is not appropriate to allocate housing growth solely based on historic build rates and that the role of the Local Development Plan is to target growth in the most sustainable locations. However, we believe historic build rates should form part of the assessment when allocating housing, particularly when considering previous completions are removed from the initial allocation figure. This will provide a more robust evidence base than solely relying on census data at 2011, as settlements with a high build rate will now hold a higher percentage of households than in 2011.
- 3.2.5 Taking this into consideration, Table 7 below identifies a summary of updated allocations which are calculated using an average of our initial allocations (based on the revised housing growth **figure, 2011 census data and the Council's** HEF) and historic build rates. Once this average was calculated, the allocations were adjusted using the methodology carried out by the Council when considering the Housing Evaluation Framework to ensure total allocations for settlement tiers remained the same. Full calculations can be found at Annex 3.

Table 7: TSA Revised allocations taking into consideration historic build rates

Settlement	DPS Allocation 2012-2030	TSA Allocation (2015 to 2033)	Final Adjusted TSA Allocation 2015 to 2033
Main Towns			
Ballymena	1791	1923	2251
Carrickfergus	1667	1789	1600
Larne	1178	1265	1126
Total	4636	4977	4977
Small Towns			
Greenisland	357	383	499
Whitehead	222	238	107
Ahoghill	192	207	214
Broughshane	176	189	221
Cullybackey	175	187	163
Total	1122	1204	1204
Villages			
Kells/Connor	135	145	172
Carnlough	93	101	67
Ballycarry	85	91	89
Portglenone	81	87	100
Ballystrudder	62	67	69
Ballygalley	45	49	36
Glynn	40	40	22
Glenarm	35	38	21
Cargan	32	35	43
Martinstown	16	17	58
Clough	12	14	7
Total	636	684	684
Small Settlements			
Small Settlements	187	201	201
Countryside	897	962	962

3.2.6 The revised allocations set out above provide a more balanced approach to the distribution of housing across the Borough. Using Greenisland and Whitehead as a comparison, Greenisland presents a more sustainable location in respect of accessibility and service provision as well as being a popular location for commuters into Belfast. Equally, Whitehead is more remote to the larger settlements of Belfast and Metropolitan Newtownabbey and as such represents a less sustainable location. The low level of housebuilding within Whitehead over the previous six years may suggest low desirability and/or that the settlement is unable to accommodate a high

level of growth due to environmental constraints. This is evidenced within Figure A5 of the Draft Plan Strategy which identifies that across all possible sites within the settlement, Whitehead is only able to deliver c.85 no. dwellings, significantly lower than the original 218 no. dwellings allocated to it for the period 2018-2030. This would indicate the requirement for a large extension to the settlement limit which may not be possible or desirable in this location. Through balancing allocations to more appropriate and desirable locations, whilst an extension to the settlement limit of Whitehead may still be required, this will be more compact and sustainable in scale.

3.2.7 Furthermore, NI Water have published information on the capacity of Waste-Water Treatment Works across the province. In respect of Mid and East Antrim, NIW have indicated that the following WWTW are nearing capacity (August 2019):

- Clogh WWTW;
- Grange WWTW;
- Larne WWTW; and
- Moorfields WWTW.

On the ground, this means a number of developments with live planning permissions are not readily buildable due to insufficient infrastructure. It is expected this will continue in the medium term and as such may impact on further development coming forward in these locations. As such, the **Council should give consideration to a settlement's ability to meet its** housing allocation where the local infrastructure may hinder development.

Completions

3.2.8 Paragraph 5.3.8 of the Draft Plan Strategy identifies that dwellings completed in individual settlements since 2012 were subtracted from the original allocation figure to determine the remaining notional allocation for settlements until the end of the Plan period. These remaining figures are set out in Table 5.4 of the DPS. However, the Introduction to the DPS sets out that the Plan period starts at 2015. As such, it is not appropriate to count dwellings constructed prior to this time within the housing allocation of the emerging Local Development Plan. Therefore, only completions between 2015 and 2018 should be discounted from the overall housing allocation. This is set out in Table 8 below, using the amended allocations set out in Table 7 as a basis.

Table 8: TSA Revised allocations 2018-2033

Settlement	TSA Allocation (2015 to 2033)	Final Adjusted TSA Allocation 2015 to 2033	Built 15-18	TSA Adjusted Allocation 2018-2033
Main Towns				
Ballymena	1923	2251	615	1636
Carrickfergus	1789	1600	321	1279
Larne	1265	1126	201	925
Total	4977	4977	1137	3840
Small Towns				
Greenisland	383	499	212	287
Whitehead	238	107	3	104
Ahoghill	207	214	76	138
Broughshane	189	221	82	139
Cullybackey	187	163	55	108
Total	1204	1204	428	776
Villages				
Kells/Connor	145	172	47	125
Carnlough	101	67	8	59
Ballycarry	91	89	16	73
Portglenone	87	100	25	75
Ballystrudder	67	69	5	64
Ballygalley	49	36	6	30
Glynn	40	22	1	21
Glenarm	38	21	1	20
Cargan	35	43	16	27
Martinstown	17	58	6	52
Clough	14	7	0	7
Total	684	684	131	553
Small Settlements				
Small Settlements	201	201	22	179

3.2.9 In line with the above recommendations, the revised allocations in relation to current live permissions (at 2018) are set out in **Table 9** below.

Table 9: TSA Revised allocations compared to 2018 live permissions

Settlement	Adjusted TSA Allocation 2018-2033	Live Permissions (2018)	Difference
Main Towns			
Ballymena	1636	996	640
Carrickfergus	1279	1222	57
Larne	925	845	80
Total	3840	3063	777
Small Towns			
Greenisland	287	167	120
Whitehead	104	11	93
Ahoghill	138	73	65
Broughshane	139	69	70
Cullybackey	108	113	-5
Total	776	433	343
Villages			
Kells/Connor	125	89	36
Carnlough	59	56	3
Ballycarry	73	173	-100
Portglenone	75	42	33
Ballystrudder	64	34	30
Ballygalley	30	1	29
Glynn	21	0	21
Glenarm	20	3	17
Cargan	27	6	21
Martinstown	52	9	43
Clough	7	16	-9
Total	553	429	124
Small Settlements			
Small Settlements	179	72	107

3.3 Changes to the Draft Plan Strategy

3.3.1 Based upon the above commentary, we respectfully suggest the following amendments are made to ensure the Plan Strategy is sound, as detailed in **Table 10**.

- *Amendment 1:* Amend Table A2 of the Draft Plan Strategy in line with Tables 5 and 6 of this report.
- *Amendment 2:* Amend Tables 5.4 and A3 of the Draft Plan Strategy in line with Table 7 and 8 of this report.
- *Amendment 3:* Update Para. 5.3.8 of the DPS to state dwellings completed in individual settlements since 2015 were then subtracted.

- *Amendment 4:* Update all figures and tables in Appendix A of the DPS in line with the suggested recommendations within this report.

Table 10: TSA suggested changes in relation to the tests of soundness

<i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i>
All amendments allow for sustainable development to form the basis of housing allocations and have due regard to the SPPS. Both amendments will allow for an adequate supply of quality housing.
<i>Soundness Test CE1 – The DPD sets out a coherent strategy for which its policies and allocations logically flow</i>
Amendment 1 ensures housing allocations take cognisance and are in accordance with other policies within the Draft Plan Strategy which promote sustainable development. Amendment 2 removes completions between 2012-2015 which is coherent with the start of the Plan period.
<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i>
All amendments take in to account all relevant evidence and provide realistic and appropriate alternatives.
<i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i>
All amendments allow appropriate flexibility to enable changing circumstances, particularly housing demand and needs.

4. Management of Housing Supply: Policy SGS5

4.1 Summary

- 4.1.1 We are supportive of the Council's Strategy as set out in Policy SGS5. We particularly welcome the statement that "In addition, to ensure a settlement meets its notional housing allocation or *identified affordable housing need*, land may be zoned for housing in the urban fringe or within extended settlement limits when the other potential sources of housing referred to above have been deemed to be insufficient". We also appreciate that the Council have acknowledged that existing commitments may change prior to the Local Policies Plan stage. However, there are points within the justification text which render the Policy Unsound as detailed in **Table 11**.

Table 11: Section 4 Summary of Relevant Soundness Tests

<i>Soundness Test C1 – Did the Council take account of the RDS</i>
The current strategy set out by the Council does not ensure that housing lands will be available for residential development contrary to Policy RG 8 of the RDS.
<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are found on a robust evidence base</i>
The Policy amplification is not appropriate in respect of zoning all lands which benefit from a live planning approval as these may not come forward for residential development over the plan period. Further evidence is required in order to understand the deliverability of these sites.

4.2 Detailed Response

- 4.2.1 Paragraph 5.3.25 of the DPS sets out, that in respect of Main Towns and Greenisland, land benefitting from a live planning permission for a residential development...will also be zoned as phase 1 housing land. Whilst we agree with the premise of this statement, further investigation is required into these sites, even when benefitting from live planning permission, to ensure availability.
- 4.2.2 The Draft Plan Strategy is unsound due to the Council's strategy of zoning all lands which benefit from live residential planning permission. Whilst we agree that these should be brought forward in the first instance, further scrutiny of these lands is required to ensure the identified sites are both adequate *and* available, as required under Policy RG 8 of the RDS 2035.
- 4.2.3 Firstly, as identified in **Section 3**, there are a number of WWTW within the Borough which are nearing capacity. Therefore, there may be a number of live planning approvals in these

locations which do not avail of the necessary infrastructure and as such, are not readily buildable. Further investigations are therefore required to determine whether lands to be zoned for housing, including those with live permission, are able to be realised within the Plan period.

- 4.2.4 Consultations should also be carried out with landowners of all potential sites to assess the availability and deliverability of these lands over the plan period. This should be carried out in respect of all potential sites and not only those lands which are currently zoned. We appreciate that the Council intend to consider the level of commitment shown by landowners of Phase 1 lands at review stage. However, this will also be vital in the first instance and in respect of lands which benefit from planning permission, as it is reasonable that landowners could intend to bring these lands forward for other uses during the preparation of the Plan. Without consultation with landowners, it is not appropriate or realistic to presume these live sites will deliver housing within the Plan period. Discussions with landowners of sites under construction will also identify current build programmes, which can assist the Council in understanding how many extant dwellings are planned to be completed within the Plan period. The Plan Strategy sets out the housing growth figure which is expected to be delivered over the Plan period and this could be significantly hindered if potential sites to be zoned within the Local Policies Plan are not *available* for development. Without a more robust evidence base and without ensuring a certain degree of flexibility, to identify that the Plan Strategy is relying upon sites with live planning approvals means that the plan is therefore unsound.

4.3 Changes to the Draft Plan Strategy

- 4.3.1 Based upon the above consideration, we respectfully suggest the following amendments are made to ensure the Plan Strategy is sound, as detailed in **Table 12**.
- *Amendment 1:* Amend Para. 5.3.28 to "Consideration will be given to the level of commitment and investment made by landowners to release and progress delivery of potential phase 1 housing land. This will also be assessed in respect of designated phase 1 housing land during the monitoring and review of the LDP"
 - *Amendment 2:* Amend Para 5.3.30 to "Subject to a review into the level of commitment and investment made by landowners to release of progress the delivery of housing, land will be zoned for housing where at the time of the Local Policies Plan it benefits from a live residential planning permission..."

Table 12: TSA suggested changes in relation to tests of soundness

<i>Soundness Test C1 – Did the Council take account of the RDS</i>
The above amendments will ensure that any lands brought forward as Phase 1 housing lands are available for development.

Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are found on a robust evidence base

Both amendments will allow for appropriate and consistent zoning of lands in the Local Policies Plan which will give a level of certainty in respect of the deliverability of lands. The amendments will ensure that a blanket zoning of lands with residential planning permission does not occur should these lands not be deliverable over the plan period. As such the amendments make the Draft Plan Strategy appropriate and realistic.

5. Greenisland

- 5.1 Given the evidence presented in this report and following a more detailed review of urban capacity sites at LPP stage, we believe there will be an identified need for further housing lands within Greenisland.
- 5.2 Page 67 of Technical Supplement 3: Housing illustrates the urban capacity within Greenisland for further housing lands and a number of these sites have since been built out or planning permission expired.
- 5.3 Once a robust assessment has been carried out, we believe an extension to the existing Greenisland Settlement Development Limit will be required to facilitate the delivery of housing growth. We will assess this further at Local Policies Plan stage and whilst we appreciate that any extensions and residential designations are reserved for this stage, we felt it would be expedient to make the Council aware at this point that our client is committed to bring the lands identified at Annex 4 forward for residential development within the plan period. As such, these lands are *available* and would assist in *delivering* the minimum housing growth figure in line with the Draft Plan Strategy.
- 5.4 The identified lands measure c.7.7ha and are located to the South East of Greenisland as shown at TSA 2 below. The site is strategically situated in close proximity to the A2 Shore Road which connects the site with Carrickfergus and Belfast City Centre.
- 5.5 The site lies adjacent to the current settlement development limit along its south western boundary and is bound by existing residential development at Whinfield Lane to the north east and Shore Road to the south east. This includes the development of 15 no. dwellings at Fortfield Manor (Planning Ref: LA02/2017/0875/F) which were recently completed by our client. The remainder of the site is bound by the A2 dual carriageway to the North.



TSA 2: Site Location

- 5.6 The subject lands can be accessed through the now completed development at Fortfield Manor and benefit from an existing Right-Hand Turn Lane at Shore Road as shown at TSA 3. This RHTL serves the existing development at Fortfield Manor and is capable of access for the entire subject site (7.7ha). As such, access to the subject lands is readily available.



TSA 3: Right Hand Turn Lane on Shore Road

- 5.7 The site represents an appropriate extension to the settlement limit as evidenced at Annex 5, and allows for the A2 dual carriageway to provide a natural boundary to the settlement. The concept plan included at Annex 6 illustrates potential residential development on the site which reads as a natural extension to the existing residential development.
- 5.8 For the reasons set out above, we respectfully request the Council retain Section 5 of this representation to inform the Local Policies Plan stage, whereby the identified site would form a natural extension to the existing settlement of Greenisland and assist in delivering residential dwellings in a sustainable location which meet the required housing growth within the plan period.

6. Conclusions

- 6.1 In conclusion, this representation has assessed the published Draft Plan Strategy in respect of the Spatial Growth Strategy and found same to be unsound, taking in to account the soundness tests set out in Development Plan Practice Note 6 – Soundness.
- 6.2 The representation has analysed the overall Housing Growth Figure and identified this should be increased to a figure of 8,028 in order to take account of local evidence and to accord with the LDP timetable, allowing reasonable flexibility to deal with a change in circumstances.
- 6.3 The allocation of housing growth between individual settlements has been reconfigured to take due consideration of all **evidence including the Council's HEF and historic build rates**.
- 6.4 The representation has suggested amendments in respect of the management of housing lands to increase the certainty that any future zoned housing lands are both adequate and available for development.
- 6.5 For the reasons set out within this representation we respectfully request the stated amendments are supported and brought forward within the adopted Draft Plan Strategy.
- 6.6 Additionally, whilst we appreciate that any extensions and residential designations are reserved for Local Policies Plan stage, we respectfully request the Council retain Section 5 of this representation to inform the Local Policies Plan stage, whereby the identified site would form a natural extension to the existing settlement of Greenisland.

ANNEX 1

Letter from Dfi to Heads of Planning

Regional Planning Directorate



Department for

Infrastructure

An Roinn

Bonneagair

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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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 it's 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

ANNEX 2

TSA Amended Allocations Based on Increased Housing Growth

Annex 2 - TSA Revised Allocations Based on Increased Housing Growth Figure of 8,028

			Council DPS Figures					TSA Adjusted Figures				
A	B	C	D	E	F	G	H	I	J	K	L	M
1	Settlement	2011 Census Split (%)	DPS Allocation (Based on growth of 7,477 2012-2030)	Adjusted HEF %	Adjusted Figure (Column D increased by % in Column E)	Adjusted % of Tier (Column F figures as % of F Total)	Final Adjusted (Column D total split as per % in Column G)	TSA Allocation (Based on growth of 8,028 2015-2033)	HEF Adjusted Figure (Column I increased by Column E %)	Adjusted % of Tier (Column I figures as % of I Total)	TSA Adjusted Allocation	TSA Adjusted Allocation Rounded
2	Main Towns											
3	Ballymena	23.6	1265	5	1853.25	38.64	1791	1894.608	1989.3384	38.63543212	1922.885457	1923
4	Carrickfergus	22.5	1682	2.5	1724.05	35.95	1667	1806.3	1851.4575	35.95761313	1789.610405	1789
5	Larne	15.9	1189	2.5	1218.72	25.41	1178	1276.452	1308.3633	25.41004661	1264.65802	1265
6	Total		4636		4796.02		4636	4977	5149.1592	100.0030919	4977.153882	4977
7												
8	Small Towns											
9	Greenisland	4.59	343	10	377.3	31.77	357	368.4852	405.33372	31.76596552	382.4622248	383
10	Whitehead	3.22	241	-2.5	234.97	19.78	222	258.5016	252.03906	19.75227743	237.8174203	238
11	Ahoghill	2.6	194	5	203.7	17.15	192	208.728	219.1644	17.17589342	206.7977567	207
12	Broughshane	2.44	182	2.5	186.55	15.71	176	195.8832	200.78028	15.73513166	189.4509852	189
13	Cullybackey	2.15	161	15	185.15	15.59	175	172.602	198.4923	15.55582288	187.2921075	187
14	Total		1121		1187.67		1121	1204.2	1275.80976	99.98509091	1203.820495	1204
15												
16	Villages											
17	Kells/Connor	1.7	127	12.5	142.87	21.17	135	136.476	153.5355	21.23589212	145.2535021	145
18	Carnlough	1.18	88	12.5	99	14.67	93	94.7304	106.5717	14.74020747	100.8230191	101
19	Ballycarry	1.12	84	7.5	90.3	13.38	85	89.9136	96.65712	13.36889627	91.44325046	91
20	Portglenone	1.04	78	10	88.8	12.72	81	83.4912	91.84032	12.7026722	86.88627784	87
21	Ballystrudder	0.82	61	7.5	65.57	9.72	62	65.8296	70.76682	9.787941909	66.94952266	67
22	Ballygalley	0.7	52	-7.5	48.1	7.13	45	56.196	51.9813	7.18966805	49.17732946	49
23	Glynn	0.56	42	-6.22	42	6.22	40	44.9568	42.16048704	5.831326008	39.8862699	40
24	Glenarm	0.51	38	-2.5	37.05	5.49	35	40.9428	39.91923	5.52133195	37.76591054	38
25	Cargan	0.47	35	-2.5	34.12	5.06	32	37.7316	36.78831	5.088286307	34.80387834	35
26	Martinstown	0.23	17	-2.5	16.57	2.45	16	18.4644	18.00279	2.490012448	17.03168515	17
27	Clough	0.19	14	-5	13.3	1.97	12	15.2532	14.49054	2.004224066	13.70889261	14
28	Total		636		677.68		636	684	722.714117	99.96045879	683.7295381	684
29												
30	Small Settlements	2.5	187				187	201		201		201
31	Total		187				187	201		201		201
	Countryside	12	897				897	962		962		962

ANNEX 3

TSA Amended Allocations Taking into Consideration Historic Build Rates

Annex 3 - TSA Revised Mid and East Antrim Allocations Incorporating Historic Build Rates

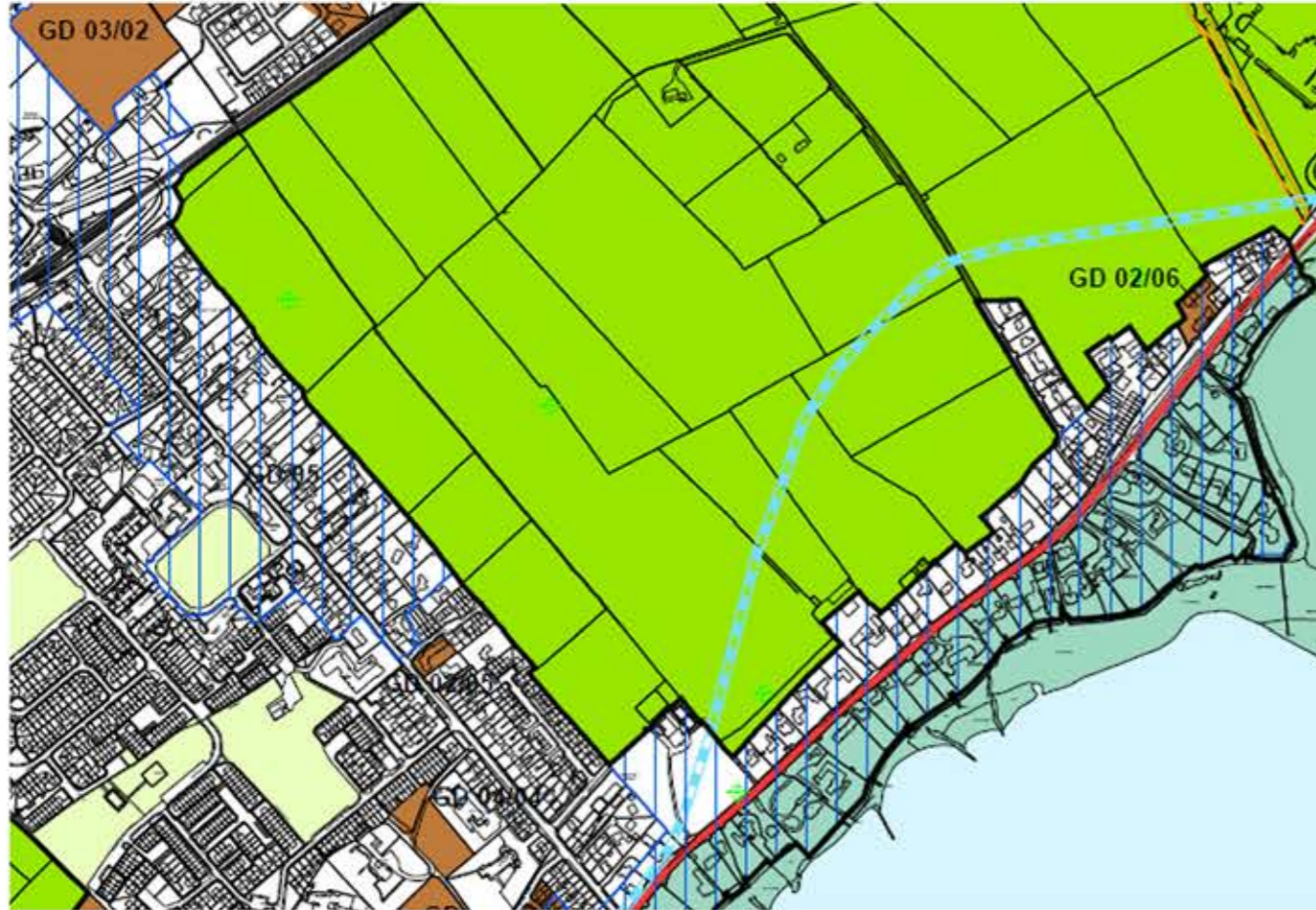
A	B	C	D	E	F	G	H	I	J	K	L	M	N
Settlement	TSA Allocation (2015 to 2033) From Annex 2	TSA Allocation Per Annum (18 years)	Dwellings Built 12-18	Annual Build Rate Per Annum 2012-2018	Avg. of Column C and E (Per Annum)	Revised Allocation (Column F x 18)	Adjusted % of Tier Total	Final Allocation 2015-2033	Final Allocation Rounded	Built 15-18	Adjusted Allocation 2018-2033	Live Permissions	Difference
Ballymena	1923	106.8333333	800	133.3333333	120.0833333	2161.5	45.22912743	2251.053672	2251	615	1636	996	640
Carrickfergus	1789	99.38888889	428	71.33333333	85.36111111	1536.5	32.15107763	1600.159134	1600	321	1279	1222	57
Larne	1265	70.27777778	299	49.83333333	60.05555556	1081	22.61979494	1125.787194	1126	201	925	845	80
Total	4977	276.5	1527	254.5	265.5	4779	100	4977	4977	1137	3840	3063	777
Greenisland	383	21.27777778	261	43.5	32.38888889	583	41.42095915	498.7083481	499	212	287	167	120
Whitehead	238	13.22222222	4	0.666666667	6.944444444	125	8.880994671	106.9271758	107	3	104	11	93
Ahoghill	207	11.5	98	16.33333333	13.91666667	250.5	17.79751332	214.2820604	214	76	138	73	65
Broughshane	189	10.5	109	18.16666667	14.33333333	258	18.330373	220.6976909	221	82	139	69	70
Cullybackey	187	10.38888889	65	10.83333333	10.61111111	191	13.57015986	163.3847247	163	55	108	113	-5
Total	1204	66.88888889	537	89.5	78.1944444	1407.5	100	1204	1204	428	776	433	343
Kells/Connor	145	8.055555556	63	10.5	9.277777778	167	25.13167795	171.9006772	172	47	125	89	36
Carnlough	101	5.611111111	10	1.666666667	3.638888889	65.5	9.857035365	67.4221219	67	8	59	56	3
Ballycarry	91	5.055555556	27	4.5	4.777777778	86	12.9420617	88.52370203	89	16	73	173	-100
Portglenone	87	4.833333333	36	6	5.416666667	97.5	14.67268623	100.3611738	100	25	75	42	33
Ballystrudder	67	3.722222222	22	3.666666667	3.694444444	66.5	10.00752445	68.45146727	69	5	64	34	30
Ballygalley	49	2.722222222	7	1.166666667	1.944444444	35	5.267118134	36.02708804	36	6	30	1	29
Glynn	40	2.222222222	1	0.166666667	1.194444444	21.5	3.235515425	22.13092551	22	1	21	0	21
Glenarm	38	2.111111111	1	0.166666667	1.138888889	20.5	3.085026336	21.10158014	21	1	20	3	17
Cargan	35	1.944444444	16	2.666666667	2.305555556	41.5	6.245297216	42.71783296	43	16	27	6	21
Martinstown	17	0.944444444	32	5.333333333	3.138888889	56.5	8.502633559	58.15801354	58	6	52	9	43
Clough	14	0.777777778	0	0	0.388888889	7	1.053423627	7.205417607	7	0	7	16	-9
Total	684	38	215	35.83333333	36.916667	664.5	100	684	684	131	553	429	124
Small Settlements	201								201	22	179	72	107

ANNEX 4
Site Location Plan

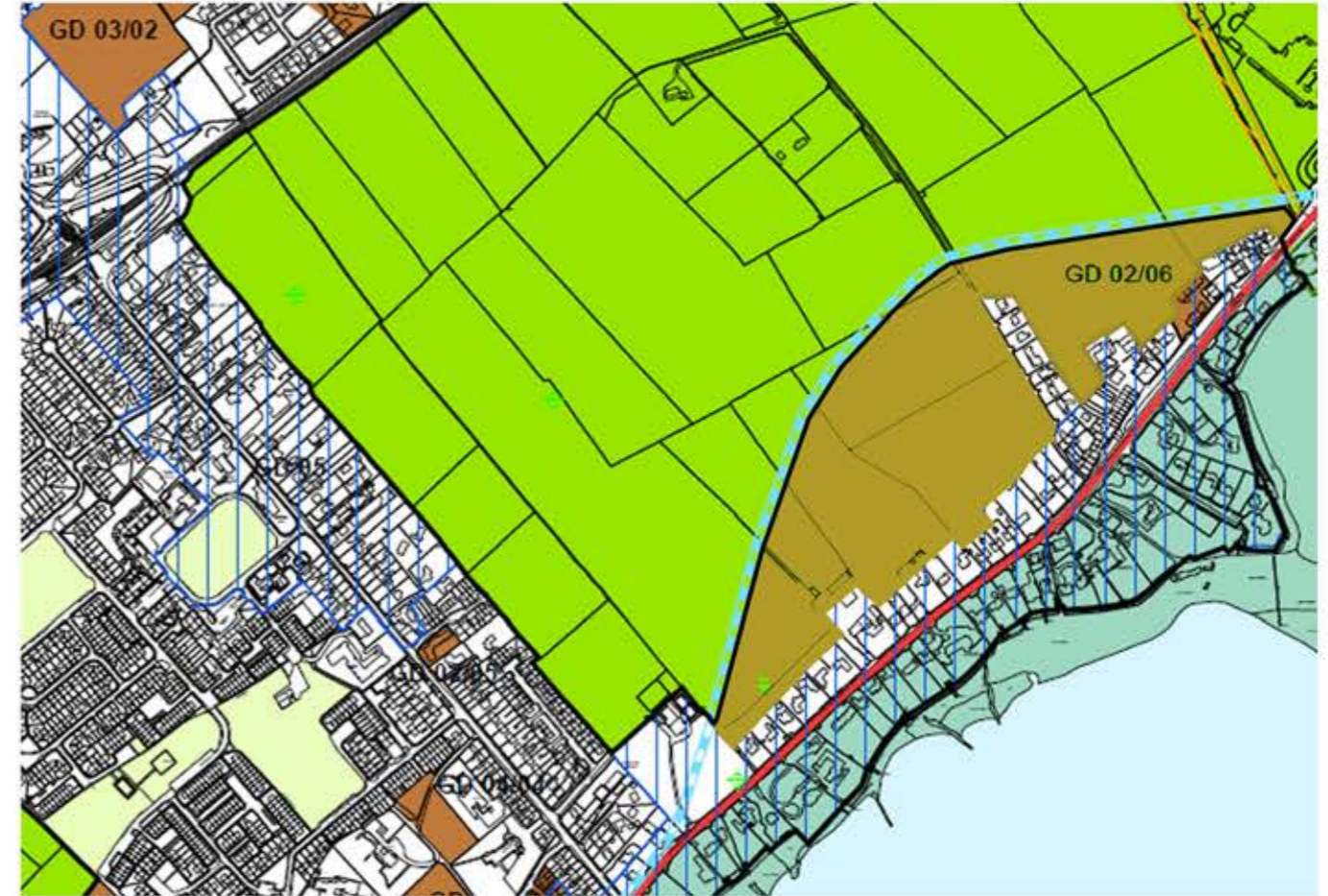


ANNEX 5

Existing and Proposed Area Plan Maps



Existing Area Plan



Proposed Area Plan

ANNEX 6

Potential Residential Development



0 125 METRES