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

Section B. Your Details

Are you responding as individual, as an organisation or as an agent acting on behalf of Q1. 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.) What is your name? **Q**2. Title Miss First Name (Required) **Emma** Last Name (Required) Walker Email emma.walker@turley.co.uk Did you respond to the previous Preferred Options Paper? **Q**3. **✓** 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)
Turley
Your Job Title / Position (Required)
Associate Director
Organisation / Group Address (if different from above) Address Line 1 (Required)
Hamilton House
Line 2
3 Joy Street
Line 3
Town (Required)
Belfast
Postcode (Required)
BT2 8LE

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. **Antrim Construction Company Client Contact Details** Title First Name (Required) Last Name (Required) Address Line 1 (Required) 130-134 High Street Line 2 Line 3 Town (Required) Holywood Postcode (Required) **BT18 9HW** 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
Thease select one ttern 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 you 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

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)** See Enclosed Representation (and/or) Relevant Paragraph number(s) See Enclosed Representation (and/or) **District Proposals Map** See Enclosed Representation

See Enclosed	I Representation		

See Enclose	d Representation		
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MEA draft Plan Strategy RepresentationsAntrim Construction Company (ACC)

December 2019



Contents

Executive S	ummary	i	
1. Intr	Introduction		
2. Legi	islative Compliance	5	
3. Spa	tial Growth Strategy	7	
4. Gen	neral Policy for all Development	18	
5. Buil	ding Sustainable Communities	19	
6. Trai	nsportation, Infrastructure and Connectivity	34	
Appendix 1	: POP Submission on behalf of ACC		
Appendix 2	: Review of Sustainability Appraisal (Turley Sustainability)		
Appendix 3	: September 2019 HGIs 2016-2030		
Appendix 4	: Technical Review of the Evidence Base Underpinning the Housing Strategy (Turley Economics)		
Appendix 5	: Settlement Evaluation – Ballymena		
Appendix 6	Representation in response to Antrim, Ballymena & Larne Issues Paper, January 2004		
Appendix 7	: Appeal Decision 2017/A0207 (Ballymena Area Plan 1986-2001 Road Scheme)		
Appendix 8	ppendix 8: RPS note on Developer-Led Road		
Appendix 9	: Housing Land Supply Analysis		
Appendix 1	0: Note on Housing Lead in Times (Turley Economics)		

ClientAntrim Construction Company (ACC)

Our reference ANTB3001

11 December 2019

Executive Summary

- This representation is submitted behalf of Antrim Construction Company (ACC) in response to consultation on the Mid and East Antrim Borough Council draft Plan Strategy (dPS).
- 2. The dPS is unsound as the legal compliance tests have not been met.
- Furthermore, the Sustainability Assessment (SA) provided in support of the dPS is flawed. These flaws render the dPS in its entirety unsound as soundness test P3 cannot be met.
- 4. The following table summarises the draft policies which are unsound, for the reasons specified, with a reference in this representation:

Schedule of key draft Policy Comments

Policy	Comment	Para ref.
Draft Policy SGS3	The draft policy sets out plans for too few new homes and under-allocates, with the potential to undermine the Spatial Growth Strategy. It does not take sufficient account of the RDS insofar as it is understood to direct a scale of growth to the main settlements. Neither does it sufficiently recognise and plan for cross-boundary connections. Draft Policy SGS3 is unsound as the policy fails	3.1-3.50
	soundness tests C1, C4, CE1 and CE4.	
Draft Policy SGS5	The overall intent of this policy is welcomed insofar as it provides a mechanism for review of the housing land supply but, as drafted, the approach limits its potential effectiveness by restricting itself to existing settlement limits.	3.51-3.56
	Draft Policy SGS5 is unsound as the policy fails soundness tests CE1 and CE4.	
Draft Policy GP1	The draft policy is inconsistent with the SPPS presumption in favour of sustainable development and lacks clarity.	4.1-4.6
	Draft Policy GP1 is unsound as the policy fails soundness tests C3 and CE2.	
Draft Policy HOU1	The draft policy introduces a varied approach to the existing policy position and is not supported by any robust evidence to justify a variation.	5.2-5.8
	Parts of the policy are incoherent.	
	Draft Policy HOU1 is unsound as the policy fails soundness tests C3, CE2 and CE3.	

i

Draft Policy HOU5	The draft policy is not supported by a robust evidence base and in its current form would conflict with the SPPS.	5.1-5.26
	The Council has failed to consider the implementation of the policy and the potential implications on viability and provision of particular housing types.	
	Draft Policy HOU5 is unsound as the policy fails soundness tests P2, C3, CE1, CE2, CE3 and CE4.	
Draft Policy HOU6	The policy is not formulated on an up-to-date evidence base; does not contain an appropriate degree of flexibility; and does not contain clear mechanisms for implementation.	5.27-5.46
	A number of recommendations are provided below to ensure a 'sound' plan	
	Draft Policy HOU6 is unsound as the policy fails soundness tests P2, CE2, CE3 and CE4.	
Draft Policy HOU7	The policy is not formulated on an up-to-date evidence base and does not contain an appropriate degree of flexibility.	5.47-5.65
	Draft Policy HOU7 is unsound as the policy fails soundness tests CE1, CE2 and CE4.	
Draft Policy OSL4	There is insufficient evidence within the technical supplement to support the policy proposed and to justify a different approach to existing policy. Furthermore the council has failed to consider the implications of the policy on the delivery of housing.	5.66-5.80
	A robust, up to date evidence base should be prepared to support this draft policy.	
	Draft Policy OSL4 is unsound as the policy fails soundness tests C3, CE2 and CE4.	
Draft Policy TR6	The policy is not formulated on an up-to-date evidence base; does not contain an appropriate degree of flexibility; and does not contain clear mechanisms for implementation.	6.1-6.23
	Draft Policy TR6 is unsound as the policy fails soundness tests C3, CE 2, CE3 and CE4.	
Draft Policy FRD4	The policy is not formulated on an up-to-date evidence base; does not contain an appropriate degree of flexibility; and does not contain clear mechanisms for implementation	6.24-6.34
	A number of recommendations are provided below to ensure a 'sound' plan.	
	FRD4 is unsound as the policy fails the test of CE2, CE3 and CE4 $$	

1. Introduction

- 1.1 This representation is submitted on behalf of Antrim Construction Company (ACC) in response to the consultation on the Mid & East Antrim (MEA) Borough Council draft Plan Strategy (dPS). The ACC representation made in response to the publication of the Preferred Options Paper (POP) is at Appendix 1.
- 1.2 Since its formation 53 years ago Antrim Construction Company Ltd has completed over 10,000 new homes across counties Antrim, Down and Armagh. All large towns across the Mid and East Antrim borough including many of their surrounding settlements have residential schemes developed by the company, some of which are listed below:
 - Ballymena Town over 1,000 new homes completed to date
 - Beech Drive, Cushendall Road
 - Rockgrove, Ballymoney Road
 - Carnvale, Carniny Road
 - Prospect, Old Galgorm Road
 - The Beeches, Old Galgorm Road
 - Grangegorm, Cambridge Avenue
 - Galgorm Hall, Galgorm Road
 - Forthill, Old Antrim Road
 - Ballymena Villages
 - Broughshane Woodlands and The Knockans
 - Cullybackey Shellinghill Lane
 - Ahoghill Belgrano and Carnmoyne
 - Gracehill Gracefields and Academy House
 - Moorefields Fairlands
 - Larne over 500 new homes completed to date
 - Killyglen Killyglen Road
 - Heatherdale Old Glenarm Road
 - Inverary Heights Carrickfergus Road
 - The Hamptons Ballyhampton Road

- Porter Green off the Ballyhampton Road
- Larne Villages
 - Gynn Glenburn
 - Islandmagee Island Village
- Carrickfergus Town over 1,000 new homes completed to date
 - Copperwood Marshallstown Road
 - Burleigh Heights Middle Road
 - Glenburn Manor Prospect Road
 - Downshire Manor Prince Andrew Way
 - Broadridge Prince Andrew Way
 - Broadlands Prince Andrew Way
 - Castle Meadows Tudor Road
- Greenisland
 - Farmlodge
- 1.3 As generational businesses rooted in its local communities, the company has a keen interest in planning and the delivery of quality neighbourhoods that meet the needs of current and future generations of MEA residents.
- 1.4 This submission is structured to respond to the key sections of the draft Plan Strategy that are of relevance to ACC.

2. Legislative Compliance

- 2.1 In preparing their draft Plan Strategy (dPS), Mid & East Antrim Borough Council ('the Council') is required to adhere to the provisions of the Planning Act (Northern Ireland) 2011 ('Act') and the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 ('Regulations').
- 2.2 This section identifies issues in the compliance of the dPS with the Act and the Regulations.

Planning Act (Northern Ireland) 2011

- 2.3 Part 2 of the Act stipulates that the Plan Strategy should be prepared in accordance with the Council's timetable, as approved by the Department for Infrastructure ('Dfl') and in accordance with the Council's Statement of Community Involvement.
- 2.4 The Council's Timetable, as approved and published on the Council's website is dated 2019. We note that the Council did publish the dPS within the 3rd Quarter of 2019 as indicated in the approved timetable as it was made public on 17 September. However, we would highlight that the timetable shows that this timeframe will include:
 - An 8 week statutory public consultation period; and
 - An 8 week statutory consultation on counter representations.
- 2.5 We note that the formal consultation period on the dPS did not commence until 16 October 2019 and therefore falls outside of the broad timeframe set out in the timetable. This also means that the counter-representation stage falls outwith the agreed timeframe and could result in further conflict with the timetable.
- 2.6 In preparing a Plan Strategy, the Council must take account of:
 - "the regional development strategy;
 - The council's current community plan;
 - Any policy or advice contained in guidance issued by the Department;
 - Such other matters as the Department may prescribe or, in a particular case, direct, and may have regard to such other information and considerations as appear to the council to be relevant."
- 2.7 This representation identifies specific instances where, in particular, policy issued by the Department has not been adequately assessed.
- 2.8 The Act also requires that the Council:
 - "(a) carry out an appraisal of the sustainability of the plan strategy; and
 - (b) prepare a report of the findings of the appraisal."

2.9 We have identified significant flaws with the Council's Sustainability Assessment and identify them in Appendix 2 of this representation.

3. Spatial Growth Strategy

Draft Policy SGS3 - Strategic Allocation of Housing to Settlements

- 3.1 SGS3 states that the draft Plan Strategy will make provision for 4,256 dwellings within settlements for the period 2018-2030 and 350-400 new dwellings in the countryside over the same period, as detailed in Table 5.4 in order to ensure the HGI is met.
- 3.2 SGS3 is unsound as the draft policy fails the tests of:
 - CE1 and CE4 Coherence and Effectiveness
 - C1 and C4 Consistency
- 3.3 SGS3 sets out plans for too few new homes and under-allocates, with the potential to undermine the Spatial Growth Strategy intent to:
 - Manage growth to secure sustainable patterns of development across Mid and East Antrim;
 - Focus major population growth and economic development in the three main towns of Ballymena, Carrickfergus and Larne, strengthening their roles as the prime locations for business, retail, housing, administration, leisure and cultural facilities within the Borough.
- 3.4 Coherence and Effectiveness Test CE1 is failed on this basis.
- 3.5 It also fails Consistency Test C1 insofar as the Plan does not take sufficient account of the RDS to the extent that it is understood to direct a scale of growth to these settlements.
- 3.6 Insofar as it does not sufficiently recognise and plan for the cross-boundary connection with Belfast, it also fails Consistency Test C4 and Coherence and Effectiveness Test CE1.
- 3.7 The rationale for these conclusions is set out below.

Plan Period: Need to get maximum value from process; so extend/plan for longer

- 3.8 The plan horizon is to 2030 presumably calculated as 15 years from 2015 when Council assumed plan making responsibility. On the basis of the Council's latest published timetable, the Local Policies Plan (LPP) part of the plan is not anticipated to be adopted until Q4 2022, roughly half way through the plan period.
- 3.9 Paragraph 5.3 recognises that there are many factors that could potentially impact upon the timescale for delivery of the LDP. Other LDP timetables, such as Ards & North Down describe such factors, including effective governance arrangements, involvement

¹ https://www.midandeastantrim<u>.gov.uk/downloads/MEA_LDP_Timetable.PDF</u>

- of Elected Members, a robust level of resourcing (within the LDP team, consultees and that of the Independent Examiner), as risks.
- 3.10 Whilst it is accepted that the timetable is indicative, subject to review and can be revised, taking into account the potential risks to the process it may be optimistic to suggest that the LPP part of the Plan would be adopted by the end of 2022. Comparisons with the pre-2015 plan making regime may be difficult to make given the changes but as a matter of fact, even if the Council's indicative timetable is achieved, it will have taken six years to get to the point of adoption of the draft Plan Strategy (dPS). Even working on the basis that the Local Policies Plan (LPP) takes half of this time to adopt takes LPP adoption to 2025.
- 3.11 The length of time it takes to prepare applications and secure planning permission on freshly zoned land (should it be required) is also an important consideration a newly zoned site for housing or employment in 2025 of reasonable scale would not be likely to be able to be commenced and make any significant contribution until 2027, with substantive delivery likely to extend well into the next plan period on the basis of the current stated end date of the plan.
- 3.12 Whilst it is obviously understood that plans are material beyond their stated end date, given the time and resources being invested in the process by the Council, consultees and stakeholders, getting the most out of the plan making process is critical, particularly given the age of the statutory plans for Ballymena and Larne (both adopted 1989).
- 3.13 Belfast City Council has taken a slightly longer term view and established a plan period to 2035. It published it's POP in January 2017. Derry City & Strabane District Council has set out a plan period to 2032. It published it's POP in May 2017, around the same time as MEA.
- 3.14 A longer plan period, to 2035 would also make it more likely that the final plan could clearly and distinctively move the statutory plan for the Borough beyond the 'inherited' strategies, limits and zonings of the legacy plans. This would also bring it into line with the relevant guidance from the Department.² Otherwise the risk is that when the LPP part of the plan is finally adopted, comparison with the previous plans could raise questions around what has actually changed. Given the relatively limited change from Carrickfergus Area Plan 2001 to BMAP, the concern would be that plans adopted nearly 40 years apart would not be that different. With the repatriation of planning to local government the expectation around the new Council's first plan is understandably high.
- 3.15 An alternative to selection of a longer plan period would be to identify additional reserves of land to bridge a gap which might emerge in future. This has been the practice in other plan-making exercises such as the Lisburn Area Plan 2001 and BMAP.

Issues with HGIs; recessionary trends & suppressed build rates

3.16 Dfl published 2016 based Housing Growth Indicators (HGIs) in September 2019 (Appendix 3). Whilst the HGI for MEA remained at 5,400 and did not change, the

8

² DPPN1 para 2.6 bullet 1 states that a plan should provide a 15-year plan framework

publication provided a useful reminder of the purpose and value of HGIs. The following statements in the Chief Planner's covering letter are important:

- 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...predict the impact that....changing economic circumstances or other future events may have on housing requirements.
- 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 other further considerations that, in addition to the HGI, should also inform this housing allocation.
- These include the 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.

HGIs as Policy Neutral

- 3.17 The HGIs as 'policy neutral' is a particularly important point to consider. If, as the evidence discussed below would suggest, this means that the disaggregation/distribution of HGIs calculated at regional level, to Council level has not had regard to policy such as the RDS' regional spatial strategy and is simply a projection of population and household trends which the RDS direction has yet to properly influence, this must reduce extent to which the Council should take account of it.
- 3.18 The table below compares the 2012 based HGIs to the recently published 2016 based HGIs, with the difference identified in the final column. It is clearly evident that Belfast's HGI has been significantly reduced by the refresh exercise undertaken by DfI (-46%), as has fellow Belfast Metropolitan Area (BMA) Councils Antrim & Newtownabbey (-42%) and Ards & North Down (-23%). The HGI for other Councils such as ABC has been significantly increased (+19%). These changes are at odds with the RDS policy objective of strengthening Belfast as the regional economic driver within a framework of balanced regional growth.

Table 3.1: HGI Analysis

Council	2012 HGI	2016 HGI	+/-	% Change
A&N	7200	4200	-3000	-42
A&ND	7100	5500	-1600	-23
ABC	14400	17200	2800	19
Belfast	13700	7400	-6300	-46
CCG	6700	5600	-1100	-16
DCS	5000	4100	-900	-18
FO	4500	4300	-200	-4
LC	9600	10700	1100	11
MEA	5400	5400	0	0
ми	9500	10300	800	8
NMD	10900	10000	-900	-8
	94000	84700	-9300	-10

Sources: 2012 & 2016 Based HGIs

3.19 The RDS itself confirms that the HGIs are not policy neutral nor are they based on past trends:

The figures in Appendix B, Table B2 are not to be seen as a rigid framework but as guidelines for local planning. The distribution across council areas reflects what might be required to achieve the policy objectives of strengthening Belfast as the regional economic driver and Londonderry as the principal city of the North West. They are not based purely on past trends of population movement. (RDS p43)

- 3.20 The extent to which the refreshed HGIs conflict with the policy objective of regional balance expressed as a 52%/48% split between the North, South and West of the region and the BMUA districts and hinterland is difficult to be precise about given the change in Council boundaries in 2015 but a crude comparison³ would suggest that the split may be of the order of 61/39, so significantly shifting against the BMUA districts.
- 3.21 The fact that this change to HGIs has been made without consultation must make them difficult for local Councils to handle in the context of Plan-making. When the lineage of HGIs is reviewed it can be seen that they were subject to public consultation and independent examination in 1999 and 2005/6 (five year review) and consultation in 2011 (ten year review), however, there has been no public consultation or associated independent examination since then. If, as is suggested by the simple analysis set out

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³ Antrim & Newtownabbey, Ards & North Down, Belfast, Lisburn & Castlereagh and Mid & East Antrim have a 39% share of the 2016 total HGI

here, the refreshed HGIs mark a shift away from RDS policy objectives they should be subject to consultation and independent examination. Such consultation and examination could usefully reflect on the assumptions and evidence base which underpins the figures, including vacancy rates, second home ownership and stock replacement. The extent to which the household formation figures are influenced by the forward projection of recessionary household characteristics such as involuntary sharing arising from challenges securing mortgages could also have been considered. As it stands, these figures have been produced with no public or stakeholder scrutiny whatsoever.

- 3.22 Despite the consistency of use of language between the Dfl and dPS insofar as there is an acknowledgement that they are for guidance, not a cap/target to be met⁴ (etc), the dPS approach is to adhere to it as far as possible because it *finds no sound reason for departing from it.*⁵ Unlike other Councils, such as Belfast and Lisburn & Castlereagh, MEA has not commissioned independent analysis of the HGI so the extent to which the Council has investigated the asserted position of HGIs as 'best available evidence' is unclear (our Technical Review of the Evidence Base Underpinning the Housing Strategy is at Appendix 3). What is clear is the extent to which the dPS housing analysis works with the pro-rated HGI figure of 7,477. It clearly underpins the process of distributing the Housing Allocation in TS3 Table 7.1 which is only marginally adjusted through the Housing Evaluation Framework (HEF) process reported in TS3 Table 7.2, a table which is further addressed below.
- 3.23 The Council reviews completions against the yearly HGI, calculated as 415, in TS3 Table 7.4 and TS3 Figure 7.3. This information shows how the number of completions has grown year on year between 2012/13 and 2017/18, essentially doubling between 2012/13 and 2016/17 before almost doubling again in 2017/18. The 'average' annual HGI figure is shown as a line across the graph in Figure 7.3 but no comment is made on the data. The interpretation must be that increasing numbers of houses are being built as the housing market and the capacity of the housebuilding industry improves beyond the recession. The yearly HGI (415) compares unfavourably with the average build rate between 2015/16 and 2017/18 (661).
- 3.24 It remains to be seen whether the 2017/18 high of 925 units will be maintained but even the most basic analysis would suggest that a reliance on the HGI would be in danger of representing an entrenchment in recessionary trends. If the 2015/16-2017/18 build rate, a figure still well below the pre-recession build rates between 1999 and 2006^6 , is projected forward to 2030 (12 x 661 = 7932), or 2035 (17 x 661 = 11,237) the housing requirement would be much higher.

Insufficient housing allocated to the Main Hubs

3.25 The constraining effect of uncritically adopting the HGI as foundation is apparent in the allocation to the main settlements as reported in TS3 Tables 7.1 and 7.2. The main town total share of the allocation has been increased by 3.5% from the option identified as preferred in the Preferred Options Paper (POP), apparently as a result of

⁴ Technical Supplement 3 (TS3): Housing para 7.7.

⁵ Technical Supplement (TS3): Housing para 7.8.

⁶ Average new dwelling starts in Ballymena (410) & Larne (230) 1999-2003 were much higher.

concerns raised by DfI in respect of the risk of disproportionate share of growth in lower tier settlements, which would fail to strengthen the population in the hubs. The 3.5% increase is described as intended to significantly increase the 2011 baseline proportion of households in the main towns.

- 3.26 Whilst the objective, resonant as it is with RDS direction, is welcome, the scale of the allocation is unlikely to achieve the significant shift sought. The combined effect of the sheer number of other settlements in the settlement hierarchy and the diluting effect of the rural policy, in combination with the adherence to the HGI was unlikely to yield an allocation to Main Hubs which was consistent with the RDS direction. As a result, the risk of disproportionate growth in lower level settlements undermining the pursuit of sustainable enhancement of critical mass in the Main Hubs remains. As does the potential to undermine the Spatial Growth Strategy intent to manage growth to secure sustainable patterns of development across MEA and focus major (our emphasis) population growth and economic development in the three main towns of Ballymena, Carrickfergus and Larne, strengthening their roles as the prime locations for business, retail, housing, administration, leisure and cultural facilities within the Borough. Our comments on the Sustainability Appraisal underpinning the dPS are at Appendix 4.
- 3.27 The only way to address this issue is to significantly exceed the HGI derived allocation. Taking account of the RDS direction on main hubs is a sound reason for departing from it and there should be sufficient flexibility available within the application of the Housing Evaluation Framework to facilitate such a departure.
- 3.28 It is important to note that the objective of enhancing the critical mass of main hubs has been well established for some time now but the evidence would suggest that it has proven to be difficult to deliver. For example, Table B2 of the RDS shows that the proportion of district population in Ballymena town was 49% in 1998, falling to 47% in 2008. TS3 Appendix D provides a 2011 population figure of 29,467, 46% of the 2011 Borough population of 64,044, so the direction of travel is downwards. In this context the planning intervention needs to be of sufficient scale to achieve the desired result and certainly of a higher order of magnitude than 3.5%; the HEF/allocation for the main hubs is considered further below.

Ballymena: Unfavourable comparison to Antrim

- 3.29 Ballymena is the largest main hub in MEA, with a 2011 population of 29,782. As a Main Hub it has the same RDS status as Carrickfergus and Larne but, like each of the other settlements, it has its own unique function and character.
- 3.30 Regarded as the County Town of County Antrim, it serves a large rural hinterland. The former Ballymena Borough, at 200 square miles, was much larger than Larne (120 square miles) and Carrickfergus (30 square miles) Borough Councils. The geographical extent of its sphere of influence includes four of the six small towns in the MEA settlement hierarchy (Ahoghill, Cullybackey, Broughshane and Portglenone), as well as four of the 10 villages and more than half of the 17 small settlements.

⁷ Technical Supplement 3 (TS3) para 5.7.

⁸ Technical Supplement 3 (TS3) para 7.9.

- 3.31 This influence and position in the settlement hierarchy is reflected in the scale, relative strength and vitality of its town centre which includes a good mix of independents and national chains in both shopping centre and high street settings. Its retail catchment extended well beyond the former Ballymena Borough Council boundary and continues to extend beyond that of the MEA Borough. The 2001 Family of Settlements Report described Ballymena as being the main retail centre for the north-east of the region, indicative of the town's sub-regional role. The dPS Mid & East Antrim Retail & Commercial Leisure Need & Capacity Study confirms the importance of the settlement and its attraction.
- 3.32 Whilst recent events at Wrightbus, on the back of JTI and previous manufacturing job losses, have been a blow to the town, its function as a major centre for jobs has been important to its standing. It also includes both higher level education and health related services. The scale of the town is also reflected in its relative share of the Borough's social rented housing need. Technical Supplement 3: Housing Table 3.2, which sets out a total rented need to 2030 of 1,350 compares to 810 in Carrickfergus town and much less elsewhere.
- 3.33 When Ballymena is traced through regional planning exercises over the past 20 years or so, taking account of the type of characteristics set out above 9, when translated into HGI terms, Ballymena has consistently had a much higher housing allocation than Larne Table B2 of the RDS sets out an HGI for Ballymena of 6,400, whereas Larne's is 3,900. It is also worthwhile noting that Antrim and Ballymena have tended to have had broad parity of treatment. The same table sets out an HGI for Antrim of 7,300. Antrim & Newtownabbey Borough Council's draft Plan Strategy actively seeks to grow Antrim town as a main hub.
- 3.34 Taking this into account it would appear that either the low HGI figure or a desire to maintain parity between the three Main Hubs has adversely affected the housing allocation to Ballymena. A residual housing allocation of 991, compared to 1,239 for Carrickfergus and 879 for Larne does not properly reflect the Settlement Evaluation of Ballymena, which clearly has the capacity and policy support for further growth.
- 3.35 Further analysis of the capacity of Ballymena for growth is provided in Appendices 1, 5 and 6. Appendix 1 is a representation submitted in response to the POP for this Plan. Appendix 5 provides Settlement Evaluation information. Appendix 6 is a representation submitted in response to the Antrim, Ballymena & Larne Area Plan Issues Paper (ABLAP) in January 2004 which considers opportunities and constraints in the town.

Disconnect between land use & transportation planning

3.36 As noted in the Dfl's covering letter in relation to the HGl's, Transportation
Assessments are a factor in arriving at a housing allocation. This is reflected in the integration between land use and transport planning sought by the RDS, New Approach to Regional Transportation and SPPS. The inclusion of the Transport Test in the HEF must be in support of the SPPS' pursuit of the successful integration of transport and land use as fundamental to the objective of furthering sustainable

⁹ See also Appendix 5 – Settlement Evaluation (Ballymena)

development (SPPS 6.293). Taking this forward in the context of plan-making, paragraph 6.299 of the SPPS is as follows:

The preparation of a LDP provides the opportunity to assess the transport needs, problems and opportunities within the plan area and to ensure that appropriate consideration is given to transportation issues in the allocation of land for future development, including appropriate integration between transport modes and land use. Preparation of a local transport study will assist in this process. Councils should seek early engagement with DRD, or the relevant transport authority, and take account of their 'The New Approach to Regional Transportation' document and any subsequent transport plans.

- 3.37 So to achieve the integration sought, there is a clear emphasis on the LDP as an opportunity to assess transport needs, problems and opportunities. In this dPS, however, the indication is that a full analysis of the problems and opportunities at main hub level has been deferred to LPP stage. This postponement unfortunately fetters the ability of the plan to build in the fundamental integration between land use and transportation planning since it is clearly a factor which must bear upon arriving at a housing allocation for main hubs following application of the HEF.
- 3.38 Technical Supplement 9: Transportation and its Appendix A, Dfl's draft Transport Study are being brought forward in advance of the Belfast Metropolitan Transport Study (BMTS). A note in bold on p1 of the draft Transport Study states that the BMTS has yet to be completed and therefore this study is provided in draft form. It will remain as a draft until the BMTS is finalised and until then it is subject to change. The Department has agreed that the Mid and East Antrim Borough Council (MEA) may use the Draft MEA LTS as a technical supplement to the MEA LDP Plan Strategy.
- 3.39 Notwithstanding this attempt to inform the dPS, various difficulties are highlighted by a review of the report.
- 3.40 Measure 2 (of 10) in the draft Transport Study is to consider new orbital capacity around key town centres in conjunction with public realmenhancements or improvements to active travel modes (capacity schemes to be developer led).
- 3.41 Paragraph 7.5.8 states that a number of schemes have been designated within extant Area Plans covering the Mid and East Antrim Borough Council area, including:
 - B62 Cullybackey Bypass (Cullybackey Throughpass);
 - Ballymena South West Distributor Road; and
 - Carrickfergus Spine Road and Sloefield Road
- 3.42 Paragraph 7.5.9 states that these schemes, if ever implemented, may provide benefits to each of the town centres, including facilitating access to development lands and removal of traffic from town centres, so providing high quality public realm.
- 3.43 Paragraph 7.5.10 states that these routes are considered to be most applicable as developer led schemes to support potential land zonings.

- 3.44 The Transport Study (p62) contains the following conclusion:
 - 2: Consider new orbital capacity around key town centres in conjunction with public realm enhancements or improvements to active travel modes. Capacity schemes to be developer led.

While there are no current requirements to implement a bypass within the town centres of Ballymena, Carrickfergus, Greenisland and Larne, this option will be retained for potential consideration in the future. Should a need arise for this type of infrastructure, this measure will be reviewed. A number of potential non-strategic developer-led schemes will be considered and their benefits to the town centres reviewed.

- 3.45 Taking Ballymena as an example, the obvious difficulty is that on the basis that roads of sufficient potential value to the town have been protected for almost 35 years¹⁰, they must reasonably be regarded as an opportunity to address the transport needs, problems and opportunities within the town but the potential to achieve integration between transportation and land use planning is being frustrated by the deferral of the assessment of this opportunity until LPP stage by which time the obvious risk is that the housing allocation for the town will be too low to justify the scale of expansion necessary for a developer-led transport scheme like this. As confirmed in the RPS submission in Appendix 8, ACC are willing to discuss making a contribution to the delivery of a developer-led road.
- 3.46 Notwithstanding the change in plan-making system, the comments of Commissioners T A Rue, G Scott and J B Martin at paragraph 2.12.75 of their 14 March 2008 report into Public Local Inquiry Into Objections To The Draft Ards And Down Area Plan 2015 remain pertinent:

It seems to us that housing land allocation is an iterative process, requiring examination of both strategic and site-specific factors and seeking the best fit between them. The strategic conclusions set out above have a bearing on our assessment of the housing-related site-specific objections and the converse is also true. We return to this subject in the final chapter of our report.

Over-reliance on urban capacity study sites/long standing zonings which have demonstrably failed to deliver

- 3.47 The overall analysis of the dPS is that when the housing allocation is compared to the various different sources of housing land supply, there is no requirement for any additional zonings and indeed a failure to take account of commitments and the zoning of additional land would inevitably result in gross overprovision of housing. ¹¹ Proposal SGS5 proposes to zone for housing in the urban fringe and hold in reserve as Phase 2 land, to be released only if required to meet the Strategic Housing Allocation. ¹²
- 3.48 Whilst elsewhere the plan recognises that not all permissions may be built, the plan does tend to largely uncritically rely upon some fairly large white land, undeveloped housing zonings and urban capacity sites within its overall housing land supply.

¹⁰ See Appeal decision 2017/A0207 at Appendix 7.

¹¹ Technical Supplement 3: Housing (para 7.25).

¹² Technical Supplement 3: Housing (para 7.36).

- 3.49 When reviewed on a site by site basis, the data shows that a very significant number of the sites are longstanding and have not delivered any houses. For example, the review of Ballymena set out at Appendix 9 shows how many sites which are relied upon from a housing land supply perspective have not made a housing contribution for many years, and in some cases, show no prospect of doing so in the continued absence of a planning application. The extent to which these sites are currently affected by NIW infrastructure issues is unknown.
- 3.50 The briefing note at Appendix 10 provides evidence on how long it can take for housing to make an effective contribution. The dPS is not supported by any evidence on the housing trajectory, which undermines the robustness of its assertions around oversupply of housing land.

Draft Policy SGS5 - Management of Housing Supply

- 3.51 The LDP strategic approach to the management of housing supply is grounded in the policy aims below.
 - To ensure an appropriate supply of land to accommodate the new homes required to meet the full range of housing needs; and
 - To promote sustainable housing development within the urban footprint of our largest towns to achieve a compact urban form and more sustainable development patterns.
- 3.52 In order to provide a managed release of housing land in settlements, SGS5 proposes phasing the release of housing land according to a sequentially preferable approach.
- 3.53 In the Main Towns and Greenisland two phases are proposed, with Phase 2 land (existing urban fringe) held in reserve until Phase 1 land (live permissions/likely permissions & urban capacity sites).
- 3.54 Based on the justification and amplification text, the intent of this approach is summarised below:
 - Create compact towns, through a sequential approach to the phasing of land, in order to avoid urban sprawl by, in the first instance, focusing the growth of the residential population within the existing urban footprint;
 - Holding Phase 2 lands, located outside the urban footprint but within the settlement development limits, as a land bank to meet future need (providing a vision for the long term expansion of the largest towns within existing settlement limits);
 - Phase 2 lands will not be released for housing development until its designation changes to phase 1 as a consequence of an LDP amendment following a Plan review;

- When releasing phase 2 land, account will be taken of the latest Housing Growth Indicators, the strategic housing allocation, current land availability, housing building rates and infrastructure capacity;
- To ensure a sequential approach to development, when determining which land should be released to phase 1, account will be taken of its accessibility to the town centre and core services and also the availability of infrastructure;
- During reviews of the LDP, consideration will be given to the level of commitment and investment made by landowners to release and progress delivery of phase 1 housing land. Where no demonstrable progress has been made, consideration will be given to re-designating the land at review stage;
- The release of phase 2 housing land may also be considered where it has been demonstrated that there is insufficient uncommitted phase 1 housing land to meet affordable housing needs. Such a need should be supported by NIHE and should be selected taking into account the sequential approach above.
- 3.55 The overall intent of this policy is welcomed insofar as it provides a mechanism for review of the housing land supply which seeks to address over-reliance on sites which are not being brought forward for housing. However, the approach limits its potential effectiveness by restricting itself to existing settlement limits, which is understood to mean settlement limits in the current set of statutory plans.
- 3.56 To ensure the overall coherence and effectiveness of the Plan Strategy, and to satisfy soundness tests CE1 and CE4, this policy needs to be reviewed alongside SGS3 and extended in scope to consider the potential requirement for urban fringe land outside of existing settlement limits. This will support the Spatial Growth Strategy intent to:
 - Manage growth to secure sustainable patterns of development across Mid and East Antrim.
 - Focus major population growth and economic development in the three main towns of Ballymena, Carrickfergus and Larne, strengthening their roles as the prime locations for business, retail, housing, administration, leisure and cultural facilities within the Borough.

4. General Policy for all Development

Draft Policy GP1 - General Policy for all Development

4.1 The first paragraph of draft Policy GP1 states:

"Planning permission will be granted for sustainable development where the proposal accords with the LDP and there is no demonstrable harm to the interests of acknowledged importance. Where this is not the case there will be a presumption to refuse planning permission."

4.2 We object to the proposed wording as it runs contrary to the provisions of the SPPS which supports a presumption in favour of sustainable development. Paragraph 3.8 of the SPPS is clear that:

"the guiding principle for authorities in determining planning applications is that sustainable development should be permitted having regard to the development plan and all other material considerations, unless the proposed development will cause demonstrable harm to interests of acknowledged importance."

4.3 Furthermore the SPPS goes on to say that:

"in practice this means that development that accords with an up-to-date development plan should be approved and proposed development that conflicts with an up to date development plan should be refused, unless other material considerations indicate otherwise."

- 4.4 The policy approach endorsed in the SPPS is in accordance with Section 45 of the Planning Act which requires that regard is had to the local development plan in the determination of a planning application.
- 4.5 Furthermore, as set out in the SPPS a balanced approach to development proposals is required. There may be cases where a proposal represents sustainable development but is in conflict with a policy within the LDP. In this case, more weight may be attached to other material considerations. As drafted, Policy GP1 does not facilitate the balanced approach to assessing development proposal.
- 4.6 We recommend that, in order to prevent a conflict with soundness test C3 that draft Policy GP1 should be revised to reflect the wording contained within the SPPS.

5. Building Sustainable Communities

- 5.1 Section 8.0 of the dPS sets out the Council's policy aims with respect to Building Sustainable Communities, including the delivery of housing and open space. This section of the representation comments upon the following draft Policies:
 - HOU1 Quality in New Residential Developments in Settlements
 - HOU5 Affordable Housing in Settlements
 - HOU6 Housing Mix
 - HOU7 Adaptable and Accessible Homes; and
 - OSL4 Public Open Space in New Residential Developments.

Draft Policy HOU1 - Quality in New Residential Developments in Settlements

- 5.2 Draft Policy HOU1 sets out the requirements for all new residential development to provide a high quality, sustainable and safe residential environment. This requirement is supported.
- 5.3 The draft policy states:
 - "Where a need is identified adequate provision should be made for necessary local neighbourhood facilities to be provided by the developer as an integral part of the development."
- 5.4 It is unclear how the need will be identified. This information should be available to ensure that developers know at the outset what contributions will be required. Further clarity here is required.
- 5.5 The second part of draft Policy HOU1 states:
 - "All proposals for residential development are required to submit a Design Concept Statement or a Concept Master Plan. A Concept Master Plan will be required for developments of 200 dwellings or more or for the development in part of full, of sites of 10 hectares or more zoned for housing in the Local Development Plan or residential development on any other site of 10 hectares or more."
- A concept masterplan is to be required for a development of 200 dwellings or more of where the site is 10 hectares or more. We note that this is a lower threshold than is currently applied within PPS7 Policy QD2. The council has failed to provide evidence to justify the departure for the threshold set out in PPS7 and therefore the draft policy does not comply with soundness test C3.
- 5.7 The Council has also failed to consider the legislative requirement for some forms of planning applications, including major residential applications to be accompanied by a Design and Access Statement. The General Development Procedure Order 2015 (Article 6(3) prescribes that a design and access statement must explain the design principles

and concepts which have been applied to the development and how issues relating to the access of the development have been dealt with. Development Management Practice Note 12 goes on to state at Paragraph 5.1 that a statement must:

"also demonstrate how the proposed development's context has influences the design."

5.8 It would be prudent of the Council to consider whether the requirement for such a statement on some forms of development would result in duplicate work having to be undertaken by the applicant. A more effective approach would be for a policy to identify where information above and beyond that required by legislation may be required.

Draft Policy HOU5 – Affordable Housing in Settlements

- 5.1 Draft Policy HOU5 sets out the Council draft policy position on the provision of affordable housing. Essentially it seeks to secure 20% affordable housing within main and small towns and 10% affordable housing with other defined settlements where the development will comprise of 10 or more dwellings or a site size of 0.2ha or more.
- 5.2 It is acknowledged that the Housing Strategy presented within the draft Plan Strategy aligns with regional policy objectives as set out in the Regional Development Strategy (RDS), specifically the inclusion of policy mechanisms to provide for the needs of everyone and the provision of mixed tenure housing developments.
- 5.3 Whilst the principle of securing a mix of tenure provision is supported, we are concerned that there is insufficient evidence provided to support the Council's draft policy.
- 5.4 Technical Supplement 3 on Housing expands upon the provisions of draft Policy HOU5. It sets out that the policy has been prepared in consultation with NIHE. Paragraph 8.1.37 of the dPS sets out that:
 - "in applying this policy, the up to date Housing Needs Assessment (HNA) for Mid and East Antrim, currently carried out annually by the NIHE will be a material consideration."
- 5.5 The supporting information provided in Technical Supplement 3 indicates that the 2018 assessment was used in defining the draft policy, however this information is not provided in support of the dPS. It would be expected that the Council would publish all relevant supporting information which it is reliant upon to inform policy alongside the dPS which is out for consultation. This significant void in evidence to support the draft policy is worrying and would result in the plan failing against soundness test CE2. The SPPS sets out at Paragraph 6.139 that:

"Housing Needs Assessment/Housing Market Analysis – provides an evidence base that must be taken in to 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 travellers accommodation. The HNA will influence how the LDPs facilitate a

- reasonable mix and balance of housing tenures and types. The Northern Ireland Housing Executive, or the relevant housing authority, will carry out the HNA/HMA."
- The SPPS is therefore clear that the HNA should inform the LDP. Whilst the Council has made reference to the HNA, it is not specifically included within the supporting evidence base for the draft Plan Strategy and therefore it could not be demonstrated that the plan would comply with soundness test C3.
- 5.7 Technical Supplement 3 seeks to summarise the assessment by NIHE in various sections and it is acknowledged in paragraph 7.39 of the supplement that the social housing need varies within settlements. The same paragraph goes on to state:
 - "Examining this need alongside the notional housing allocation figure for each settlement, uncovers a number of settlements where completions and live planning permissions would already meet the allocation figure but would not meet the social rented housing need. For all these settlements, save for Broughshane, the social rented housing need could potentially be met by urban capacity and/or windfall potential."
- 5.8 The Council is reliant upon land identified in the Urban Capacity Study (Technical Supplement 3) to secure the delivery of affordable housing; however we consider there to be a number of weaknesses to the methodology applied within the Council's assessment of urban capacity. These are summarised as follows:
 - Lead-in times included within the assumptions do not accurately reflect the time taken to zone land within the local development plan; secure planning permission in accordance with the draft Policy and discharge precommencement conditions to allow a lawful start;
 - Lead-in times do not accurately reflect site preparation works for the commencement of development or annual build rates;
 - The Council is reliant on the delivery of long-standing zoned/undeveloped housing sites; and
 - The Council assumes an unconstrained yield for sites.
- 5.9 Based on these weaknesses, the conclusions reached on the ability for social housing to be secured on such sites could be flawed. Without undertaking a detailed site assessment of the proposed sites we are concerned that the Council cannot robustly demonstrate that this is the case and therefore the policy conflicts with soundness test CE2.
- 5.10 The council has acknowledged in the supporting evidence that there are variances in need for social and intermediate housing across the borough. However, the policy approach proposed in the draft Plan Strategy does not adequately reflect the variances. Furthermore the borough wide approach is a departure from the approach endorsed in the SPPS (Paragraph 6.143). There is no evidential case for a departure from the SPPS in this case and as such fails soundness test C3.

- 5.11 The draft Policy is seeking to set a threshold of 10 or more units or 0.2 hectares or more, however we can find no evidence of how this threshold has been determined and whether any alternatives where considered. On this basis, there is a conflict with soundness test CE3.
- 5.12 Technical Supplement 3 sets out that the approach set out in the POP¹³ has evolved as a result of further analysis and discussions with NIHE.
- 5.13 It was initially proposed that for Main Towns the requirement would be for 25% and for Small Towns it would 15%, however NIHE raised potential concerns about the viability of development at that level and that 20% would be more appropriate. The 20% applies also to Small Towns given the substantive need for provision in those locations. No substantive evidence is provided with the dPS to support this view and therefore there is a conflict with soundness test CE3. It is also noted that the policy as drafted does not facilitate flexibility to ensure viability or exceptions to the provision of affordable housing. As such the draft policy conflicts with soundness test CE4.
- 5.14 The supporting text to draft Policy HOU5 defines affordable housing as including social rented and intermediate housing. Intermediate housing is defined in the dPS Glossary as consisting of:

"shared ownership housing provided through a registered housing association and helps households who can afford a small mortgage, but that are not able to afford to buy a property outright. The property is split between part ownership by the householder and part social renting from the registered housing association. The proportion of property ownership and renting can vary depending on householder circumstances and preferences. The NI definition of intermediate housing may change over time to incorporate other forms of housing tenure below market rates. Where this is the case, such additional products will be considered suitable to help meet the affordable housing obligations of the policies in the LDP."

- 5.15 The flexible approach alluded to above is welcomed, however this should be expressed within the main policy section of the dPS to ensure that the policy is considered flexible enough to respond to future changes in the definition of affordable housing. This flexibility will assist in ensuring that the policy complies with soundness test CE4.
- 5.16 At the time of preparing this representation, the Department for Communities (DfC) had launched a consultation paper on proposed changes to the definition of Affordable Housing. While the proposed change would have no direct impact upon social housing, it would provide an opportunity for the private sector to provide intermediate housing products alongside registered housing associations.
- 5.17 As currently worded the policy is reliant upon the Housing Needs Assessment to identify the need for affordable housing. We would urge the council to ensure that the HNA is able to provide evidence of need for all future forms of affordable housing, should the definition change.

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¹³ Every 10th Unit in a housing scheme to be social

- 5.18 Paragraph 8.1.39 of the dPS provides further supporting text for the draft Policy. We are concerned that this paragraph suggests that a higher affordable housing provision requirement may be identified in some locations through the Local Policies Plan (LPP). This would not be consistent with the dPS and therefore the LPP could be unsound. The same paragraph also reinforces the view that a site specific approach may be more appropriate if evidence suggests that the current draft policy would be insufficient in some locations. Such an approach would align with paragraph 6.143 of the SPPS.
- 5.19 We note that the dPS does not include a policy relating to the provision of specialist accommodation, including care or elderly accommodation. Section 3 of Technical Supplement 3 (Housing) acknowledges that the Council area has an ageing population and goes on to say that:
 - "In 20115 18.1% of the population in Mid and East Antrim was aged 65 and over. By 2030 it is projected that this figure will have increased to 24%."
- 5.20 It would therefore be appropriate to ensure that a policy to provide for changing demographics is included within the dPS, particularly given that it will guide the form and location of development for the next 15 years.
- 5.21 The Council goes on at in Section 3 to say:
 - "The LDP will take account of the implications of these trends, for example in the delivery of appropriate housing in areas accessible to health and community services."
- 5.22 Given the recognition of the need for the LDP to take account of demographic trends we would recommend that the Council include a policy relating to the specialist accommodation. A gap in this policy would not be reflective of the Council's evidence base.

Soundness Test

- 5.23 Draft policy HOU5 fails to satisfy the following soundness test:
 - P2 Has the Council prepared its Preferred Options Paper and taken into account any representations made?
 - C3 Did the council take account of policy and guidance issued by the Department?
 - CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;
 - CE3 There are clear mechanisms for implementation and monitoring; and
 - CE4 It is reasonably flexible to enable it to deal with changing circumstances

Recommendation

5.24 To ensure that the dPS can be considered a 'sound' plan, we respectfully request that the Council:

- Undertakes a robust and coherent assessment of the effectiveness of the policy by:
 - Identifying a sample of sites of varying scales and types across the housing markets within the borough;
 - Undertaking a feasibility appraisal to understand the residential capacity of the sites;
 - Identifying the other policy requirements and developer contributions that would be applied to the development.
 - Identifying a series of affordable housing requirements (e.g. 5, 10 and 20% 'reasonable alternatives').
 - Undertaking a strategic viability appraisal of each requirement level for each site to understand the threshold for viability; and
 - Applying the findings of the viability assessment to inform a proposed policy approach.
- 5.25 This approach is well established within other jurisdictions.
- 5.26 The Council should also consider any potential exceptions to the provision of affordable housing, for example the provision of elderly housing or development which would facilitate the reuse of heritage assets.

Draft Policy HOU6 – Housing Mix

- 5.27 The dPS identifies draft policy HOU6 as being an operational policy that will help to achieve the SPPS objective of nurturing 'balanced communities'. In addition, the dPS considers the '…provision of a range of well-designed house types and sizes…' to be an important factor in building sustainable communities.
- 5.28 Having reviewed draft policy HOU6, it is clear that it seeks to mirror the provisions of the extant Policy HS4 of PPS 12 Housing in Settlements. However, it is noted that draft Policy HOU6 contains new provisions and modifications which are not contained within Policy HS4 of PPS12.
- 5.29 We summarise below the main differences between draft policy HOU6 and HS4 of PPS12:
 - HOU6 proposes to remove reference to the word 'only' from the first sentence of HS4;
 - HOU6 proposes to insert the following new requirement not contained in HS4 –
 '...Provision should particularly be made for smaller homes to meet future
 household requirements in Mid and East Antrim';

- HOU6 proposes to insert the following new requirement not contained in HS4 with respect to factors that will influence the required mix of house types or sizes '...and the nature of the local housing need';
- HOU6 proposes to insert the following new requirement not contained in HS4 –
 'All proposals for residential development will also be required to meet the
 General Policy and accord with other provisions of the LDP'.
- 5.30 The requirement for new residential developments to provide a mix of house types and sizes is not new. It is referred to within PPS7 and PPS12 and it forms a Core Planning Principle and a strategic policy objective of the SPPS. However, unlike PPS12, the SPPS does not specify a threshold for when the policy must be complied with. In this regard the SPPS is the prevailing policy and a conflict with the SPPS would be contrary to soundness test C3.
- 5.31 It is clear that draft Policy HOU6 proposes to utilise the threshold identified in HS4. However, having considered draft policy HOU6 and reviewed the relevant supporting documents, we have not been able to find any evidence which would support the continued use of the thresholds set out in policy HS4 of PPS12. As such the draft policy would fail against soundness test CE2.
- 5.32 The only justification that we've been able to find is the following sentence taken from Appendix H entitled 'Evolution of Relevant Draft Plan Strategy Policy' of Technical Supplement 3 entitled 'Housing':
 - 'Policy HS 4 **appears** to be working well and there is **no evidence** to suggest that **it needs to be substantially amended' (our emphasis**).'
- 5.33 The Council seems to rely on the perception that HS4 '... appears to be working well...' and that there is '... no evidence to suggest that it needs to be substantially amended'. This approach raises serious concerns with respect to the 'soundness' tests that all Local Development Plans must be assessed against.
- 5.34 Indeed, we note that DfI raised similar concerns in its response to the Council's POP and Key Issue 15, wherein it stressed the '...need to ensure evidence justifies the approach and that the implications of such a policy, in terms of development viability, should be considered' (see . pg. 48 of the Preferred Options Paper Public Consultation Report, dated November 2017).
- 5.35 We share the concerns previously raised by Dfl and having reviewed the supporting information it is our view that draft policy HOU6 is not supported by an appropriate evidence base. Furthermore the Council's decision not to review the draft policy or secure further evidence to address comment from Dfl at the POP stage would conflict with soundness test P2.
- 5.36 In terms of the preferred housing mix, draft Policy HOU6 does not provide a detailed breakdown but it states that 'Provision should particularly be made for smaller homes to meet future household requirements in Mid and East Antrim'.

- 5.37 The 'Justification and Amplification' section of draft Policy HOU6 provides the following rationale for this approach:
 - 'Currently, analysis of the local housing market in Mid and East Antrim shows an ageing population, reducing household size and a decline in the number of households with children. This emphasises the need for 'smaller size, new build houses' within the Borough (Mid and East Antrim Housing Market Analysis Update, NIHE, June 2018).'
- 5.38 It is noted that the above rationale flows from the analysis of PPS12's HS4 set out in Appendix H of Technical Supplement 3. In addition to the above, Paragraph 3.9 of Technical Supplement 3 seeks to reinforce draft Policy HOU6's approach in stating the following:
 - 'By 2030, it is projected that small households will make up 61% of the population. Consequently, this suggests that smaller size, new build housing, across all tenures, will be required to meet future household need in Mid and East Antrim'.
- 5.39 However, and importantly, Paragraph 3.10 of Technical Supplement 3 advises that '...this needs to be caveated as not all one or two people households may want to live in a smaller property if they can afford a larger property' (our emphasis).
- 5.40 So far as housing mix is concerned, relevant policies need to incorporate an appropriate degree of flexibility to allow developments to respond to the local market context and the local market need/demand. This flexibility will ensure that: innovation is not stifled; a product that the market wants is being provided; and development viability can be secured. Otherwise, these new developments will not be delivered. The overly restrictive wording with the draft policy conflicts with the flexible approach to be applied under soundness test CE4.
- 5.41 The 'Justification and Amplification' states that the proposed policy facilities the flexibility needed. Our client does not agree that the policy provides the appropriate flexibility needed. Conversely, the proposed policy provides an opportunity for the Council to be prescriptive on the size and type of housing to be provided on a site by site basis.
- 5.42 Developers are guided by market demand for housing products within a housing market area i.e. a product that home owners want to buy. To be overly prescriptive could have impacts on house prices for products for which there is a market demand but limited supply.
- 5.43 This new component of policy (when compared with HS4 of PPS12) is not supported by an appropriate evidence base which has considered the implications of such a policy on the ability of new residential developments to deliver a product that the market wants and on the overall viability of such a development. Indeed, Council has accepted that not all smaller households want a smaller home.
- 5.44 In terms of the 'smaller schemes' approach, the proposed policy fails to provide clarification on what considerations will be taken into account when assessing the individual merits of the site/proposal and as such fails against soundness test CE3.

Soundness Tests

- 5.45 Draft policy HOU6 fails to satisfy the following soundness test:
 - P2 Has the Council prepared its Preferred Options Paper and taken into account any representations made?
 - C3 Did the council take account of policy and guidance issued by the Department?
 - CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;
 - CE3 There are clear mechanisms for implementation and monitoring; and
 - CE4 It is reasonably flexible to enable it to deal with changing circumstances.

Recommendation

- 5.46 To ensure that the dPS can be considered a 'sound' plan, we respectfully request that the Council:
 - prepares an up-to-date evidence base to support this policy which takes into account all relevant considerations such as development viability and market demand;
 - amends draft policy HOU6 to include the following considerations when determining the 'required mix of house types and sizes': development viability and market demand;
 - amends draft policy HOU6 to include detail on the considerations that will be taken into account when determining the individual merits of 'smaller schemes' and the need to provide a greater variety in type and size of units; and
 - re-consults on the proposed considerations that will be taken into account when
 determining the individual merits of 'smaller schemes' and the need to provide a
 greater variety in type and size of units.

Draft Policy HOU7 - Adaptable and Accessible Homes

- 5.47 The dPS identifies draft policy HOU7 as being an operational policy that will help to achieve the SPPS objective of nurturing 'balanced communities'.
- 5.48 The 'Justification and Amplification' section of draft Policy HOU7 advises that the intention of this policy is to deliver '...homes that are accessible for those who live in them' and not just for those who visit, as required by the Building Regulations (2012). It then adds that the draft policy will apply '...to all proposals for new dwellings, flats and apartments including a dwelling located in the countryside'.
- 5.49 Furthermore, the 'Justification and Amplification' section states the following at Paragraph 8.1.47:

'It is recognised that there may be some exceptional circumstances where not all of these policy criteria can be accommodated whilst still meeting other planning policy requirements. Such cases will be considered on their merits whilst carefully balancing all policy and other material considerations'.

- 5.50 Our client welcomes the overall intention of the draft policy. Indeed, the delivery of accessible and adaptable homes capable of meeting the needs of their future users will help to improve the attractiveness of the housing product being provided. Our client also welcomes the acknowledgment that there may be instances where not all of the proposed policy criteria can be accommodated.
- 5.51 However, it is considered that the 'exceptional circumstances' test would be too high a threshold in terms of justifying a relaxation of the proposed policy, particularly noting that the policy only appears to suggest a single ground for an exception, i.e. '...meeting other planning policy requirements'.
- 5.52 The draft policy is entirely different from the preferred option set out under Key Issue 15, which referred only to apartments. Furthermore, having reviewed Technical Supplement 3 Housing, we are unable to find any evidence which supports the Council's proposed policy or sets out: why the policy should be applied to every new home and not a proportion of new homes; or how the Council assessed the implications of the proposed policy with respect to development viability. As such the draft policy would fail soundness text CE2.
- 5.53 We note that the POP, under Key Issue 15, advises that the proportion of the Mid and East Antrim population aged 65+ years is projected to rise from 16.5% in 2011 to 25% by 2030. The POP also advises that the 2011 Census revealed that 11% of people in Mid & East Antrim suffered a mobility or dexterity difficulty.
- 5.54 Technical Supplement 3 also makes reference to the above figure re: ageing population. However, these figures do not justify the application of the proposed policy to every new home. People tend to move through different housing products at different stages in their life and choose a home based on their financial circumstances and specific needs (which vary over time).
- 5.55 A sound approach would be to ensure that a proportion of new housing is tailored to these more specialised needs rather than forcing developers to construct every new dwelling to this standard. Indeed, further evidence would be required to establish the appropriate proportion taking into account development viability and any subsequent policy should incorporate an appropriate degree of flexibility. In its current form the draft policy would conflict with soundness test CE2 and CE4.
- 5.56 In terms of the financial consequences of the proposed policy, Technical Supplement 3 makes reference to a study undertaken in NI in 2002 and other research undertaken in the UK. Based on this study/research, it identifies that the additional costs associated with delivering the requirements of Lifetime Homes is estimated to range between £165 and £1,615 per dwelling.

- 5.57 Technical Supplement 3 then concludes that 'Given that those elements of the Lifetime Homes Standards which have been incorporated into HOU7 are not onerous, it is not anticipated that this policy would have significant additional cost implications'.
- 5.58 We are concerned by the lack of evidence base upon which the Council avows that the new requirements, which will apply to every new house in a new development, are 'not onerous'.
- 5.59 Technical Supplement 3 appears to base this conclusion on a perceived cost that is presented in isolation from all of the other costs associated with delivering new housing. No consideration has been given to how these costs or the implications of the proposed policy will affect overall development viability, particularly constrained sites or sites with abnormal costs associated with them.
- 5.60 It is common knowledge that brownfield sites represent some of the most difficult sites to redevelop/regenerate noting the inherent issues around physical constraints, infrastructure/access issues and legacy issues, such as contamination/remediation. Further policy requirements, like this proposed policy, which lacks an appropriate degree of flexibility, could unintentionally restrict the regeneration of brownfield sites. This outcome would be at odds with the overarching regional policy direction set out in the RDS of locating '...the majority of new housing in appropriate brownfield sites within the urban footprint of larger towns' as acknowledged in Para. 5.3.17 of the dPS.
- 5.61 This statement also fails to consider the cumulative impact of other policy developer requirements/contributions on the cost and viability of development and therefore would fail soundness test CE1.

Soundness Tests

- 5.62 Draft policy HOU7 fails to satisfy the following soundness test:
 - CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;
 - CE 2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;
 - CE 4 It is reasonably flexible to enable it to deal with changing circumstances.
- 5.63 The dPS does not contain nor is it supported by the required evidence base, which has taken into account all of the relevant considerations, such as development viability, to justify the requirements of draft policy HOU7, particularly its proposed application to all new dwellings, flats and apartments.
- 5.64 Finally, HOU7 does not incorporate an appropriate degree of flexibility as the requirement for 'exceptional circumstances' is considered to be too high a test to justify departure from the policy and the proposed policy does not include reference to all of the relevant factors that should be taken in to account, such as development constraints, which could include topography issues, ecological and environmental

sensitivities, access/infrastructure issues contamination issues and built heritage considerations

Recommendation

- 5.65 To ensure that the dPS can be considered a 'sound' plan, we respectfully request that the Council:
 - prepares an up-to-date evidence base to support this policy, particularly the requirement for all new dwellings, flats and apartments to comply with the proposed policy;
 - reassesses whether the evidence supports this policy position or an approach which requires a proportion of new housing to achieve the identified standards;
 - if after the assessment, is minded to pursue the proportion approach, reconsults on the proposed approach and the preferred proportion;
 - removes the 'exceptional circumstances' test; and
 - ensures the proposed policy incorporates an appropriate degree of flexibility by making it clear that the requirement to comply with this policy will take into account the site specific merits of each individual planning application, such as land/physical constraints, site enabling costs and development viability.

Draft Policy OLS4 - Public Open Space in New Residential Development

- 5.66 The Council's overall 'Open Space Strategy' is set out within Section 5.8 of Part One of the draft Plan Strategy. The dPS advises at paragraph 5.8.4 that 'The policy aims [of the Open Space Strategy] will be delivered primarily through the open space operational strategic subject policies set out in Part 2', i.e. draft Policies OSL1 to OSL7.
- 5.67 This submission focuses specifically on the provisions of draft Policy OSL4, which sets out policy requirements and exceptions for the provision of public open space in new residential development.
- 5.68 Having reviewed draft Policy OSL4, it is clear that it seeks to mirror, by and large, the provisions of the extant Policy OS2 of PPS 8 Open Space, Sport and Outdoor Recreation. However, it is noted that draft Policy OSL4 contains new provisions and/or modifications which are not contained within Policy OS2 of PPS8.
- 5.69 We summarise below the main differences between OS2 of PPS8 and proposed policy OSL4:
 - proposes to include an open space requirement of 15% for sites of 10 hectares or more –PPS8 Policy OS2 applies this requirement only to residential developments of 300 units or more or development sites of 15ha or more and no justification for a variation to the prevailing policy is provided by the Council;
 - proposes to replace the phrase 'ease of access' contained in the 2nd bullet point of criterion (iii) of PPS 8 Policy OS2 with 'direct and unobstructed access'. No

further clarify on how direct and unobstructed access will be defined or the rational for the variance in the wording is provided within the dPS.

- proposes to remove the exception 'incorporates the 'Home Zone' concept' contained in the 4th bullet point of criterion (iii) of PPS8 Policy OS2. Again no justification for the removal of this approach is provided within the dPS.;
- proposes, after the adoption of the Local Policies Plan, to remove the exception in PPS8 Policy OS2 for an equipped play space to be provided in residential developments of 100 units or development sites of 5ha if an equipped children's play area exists within reasonable walking distance (generally 400m) of the majority of units within the development;
- proposes, after the adoption of the Local Policies Plan, to replace the
 abovementioned exception with 'unless otherwise specified through the key site
 requirements on sites zoned in the Local Policies Plan';
- proposes to remove the following criterion of PPS8 Policy OS2 for public open space – 'its design, location and appearance takes into account the amenity of nearby residents and the needs of people with disabilities'; and
- proposes to remove the following criterion of PPS8 Policy OS2 for public open space 'it retains important landscape and heritage features and incorporates and protects these in an appropriate fashion'.
- proposes to remove the acceptable arrangements with respect to maintenance and management of public open space areas from the policy text and insert them into the 'Justification and Amplification' section only;
- proposes to remove the requirement for all developers to be responsible for the laying out and landscaping of public open space from the policy text and insert it into the 'Justification and Amplification' section only;
- 5.70 The 'Justification and Amplification' section of draft Policy OSL4 proposes to introduce the mechanism of developer contributions which is not referred to/contained in PPS8.
- 5.71 As set out above the draft Policy seeks to vary extant planning policy within PPS8. The dPS does not contain nor is it supported by the required evidence base to justify the requirements of proposed policy OSL4, particularly the 15% open space requirement for 10 hectare sites or more.
- 5.72 Furthermore, the dPS does not provide any justifications or explanations for why the proposed policy does not accord with the 'preferred option' set out in the Preferred Options Paper (POP) under Key Issue 19 Open Space Provision in New Residential, this being:

'Retention of the current strategic criteria based policy regarding public open space contained in Policy OS 2 of PPS 8 i.e. setting out a 10% requirement of open space in residential developments of 25 units or more and a 15% requirement for development

- over 300 units and an amended list of exceptions where a rate less than 10% may be acceptable unless otherwise specified through key site requirements'.
- 5.73 It is noted that Section 6.1 of Technical Supplement 4 Open Space, Sport & Leisure, dated September 2019, states that 'The preferred options and recommendations from the POP have generally been brought forward to the draft Plan Strategy, with minor amendments'. Table 6.1 of Technical Supplement 4 sets out these 'minor' amendments.
- 5.74 It is considered that the proposal to apply the 15% open space requirement threshold to sites over 10 hectares rather than 15 hectares/300 units is considered to be a 'significant' amendment not a 'minor' amendment, which is not supported by robust justification.
- 5.75 Section 6.3 of Technical Supplement 4 seeks to provide the following justification for why the proposed amendment to the 'preferred option' identified under Key Issue 19 of the POP is considered acceptable:
 - 'In regards to Key Issue 19 and draft Plan Strategy Policy OSL4, it was considered that the threshold for 15% open space requirement should be reduced from 15 hectares to 10 hectares given that the size of residential applications in Mid and East Antrim are generally well below 300 units.'
- 5.76 The justification provided is inadequate as it fails to consider the potential impact that such a requirement could have on the overall viability of a project or the implications arising out the maintenance and management of such areas. This could have a significant impact on the delivery of the policy and indeed the delivery of housing land within the district, resulting in a conflict with soundness test CE2.
- 5.77 In its current form, the proposed policy does not provide an appropriate degree of flexibility, particularly for sites that may have development constraints, which could include topography issues, ecological and environmental sensitivities, contamination issues, access issues and built heritage considerations. As such the draft policy conflicts with Soundness test CE4.

Soundness Test

- 5.78 Draft policy OSL4 fails to satisfy the following soundness test:
 - C3 Did the Council take account of policy and guidance issued by the Department?
 - CE 2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base; and
 - CE4 It is reasonable flexible to enable it to deal with changing circumstances.

Recommendation

- 5.79 To ensure that the DPS can be considered a 'sound' plan, we respectfully request that the Council:
 - prepares an up-to-date evidence base to support this policy, particularly the new 15% open space requirement affecting sites of 10 hectares or more, and then reassesses whether the evidence supports this policy position;
 - ensures the proposed policy incorporates an appropriate degree of flexibility by making it clear that open space requirements will take into account the site specific merits of each individual planning application, such as land constraints, site enabling costs and development viability;
 - defines what is meant by 'direct and unobstructed access' to areas of existing public open space contained in the exceptions provided under b) of OSL4; and
 - ensures that any proposed requirements for developer contributions or future guidance related to developer contributions builds in development viability considerations.
- 5.80 On the basis of the evidence collated, Council should reassess whether they have sufficient evidence to support this draft policy position.

33

6. Transportation, Infrastructure and Connectivity

Draft Policy TR6 Parking and Servicing

- 6.1 The Council's overall 'Transport Strategy' is set out within Section 5.7 of Part One of the draft Plan Strategy. The dPS advises that the Transport Strategy is represented by the Local Transport Study for Mid and East Antrim (LTS), prepared by the Department for Infrastructure (Dfl).
- 6.2 The dPS also advises, at paragraph 5.7.6 that the promotion of more sustainable forms of transport such as walking, cycling and public transport will be achieved through the operational strategic subject policies relating to Transportation, i.e. proposed policies TR1 to TR7 and through the Local Policies Plan.
- 6.3 This submission focuses specifically on the provisions of draft policy TR6, which sets out the parking and servicing requirements for new development and criteria for when a reduced level of car parking will be acceptable.
- 6.4 Having reviewed draft policy TR6, it is clear that it seeks to mirror the provisions of the extant Policy AMP7 of PPS3 Access, Movement and Parking. However, it is noted that TR6 contains new provisions and/or modifications which are not contained within Policy AMP7 of PPS3.
- 6.5 We summarise below the main differences between AMP7 of PPS3 and draft policy TR6:
 - TR6 proposes to remove the following text currently included within PPS3 Policy AMP7 - '... or any reduction provided for in an area of parking restraint designated in a development plan';
 - TR6 proposes to replace 'the flow of traffic' contained in PPS3 Policy AMP7 with 'the flow of goods and people';
 - TR6 proposes to remove reference to 'beyond areas of parking restraint' as contained in PPS3 Policy AMP7 with respect to acceptable circumstances for reduced levels of car parking;
 - TR6 proposes to apply the acceptable circumstances for reduced levels of car parking to all areas of the borough;
 - TR6 proposes to remove the following exception contained in PPPS3 Policy AMP7 '...where the exercise of flexibility would assist in the conservation of the built or natural heritage, would aid rural regeneration, facilitate a better quality of development or the beneficial re-use of an existing building';
 - TR6 proposes to insert a new exception not contained in PPS3 Policy AMP7 –
 "...Where the exercise of flexibility would assist Council in securing broader

- planning gain and public benefit that would outweigh the reduced level of parking';
- TR6 proposes to remove the requirement relating to car parking spaces for people with disabilities from the policy text and insert it into the 'Justification' and Amplification' section only;
- The justification and amplification text supporting draft Policy TR6 proposes to reword the requirement in PPS3 Policy AMP7 relating to car parking spaces for those with disabilities to read 'In all cases where a reduced level of parking is considered acceptable, the applicant will still be required to reserve an appropriate proportion of reserved parking spaces for those with disabilities or impaired mobility';
- The justification and amplification text supporting draft Policy TR6 proposes that proposals with car parking in excess of the published standards will only be permitted in exceptional circumstances. This requirement is currently contained within the policy wording of PPS3 Policy AMP7; and
- TR6 proposes to remove reference to car parking '... which exceed a reduction provided for in a development plan' contained in AMP7 with respect to car parking in excess of the published standards.
- 6.6 The 'Justification and Amplification' text supporting draft Policy TR6 contains the following requirements:
 - In all cases where a reduced level of parking is considered acceptable, the applicant will still be required to reserve an appropriate proportion of reserved parking spaces for those with disabilities or impaired mobility;
 - Parking provision in excess of the published standards will only be permitted in exceptional circumstances;
 - Parking provision should include an appropriate amount of electric charging points; and
 - In town centre locations, applicants will normally be expected to include proposals for the provision of rear servicing facilities where practicable.
- 6.7 It is clear that the dPS does not propose to include any areas of parking restraint within the Borough, despite Technical Supplement 9 entitled 'Transportation' accepting that 'Statutory consultees were more supportive of designating areas of parking restraint as a proactive measure towards bringing about successful place making, reducing private car usage and encouraging more sustainable forms of transportation such as walking and cycling in the Borough'.
- 6.8 Having reviewed the dPS and relevant documents supporting this proposed policy, it appears that the only justification provided for the approach on areas of parking restraint is set out in section 4.8 of Technical Supplement 9, which states the following:

- 'Due to lack of clear support for either option, coupled with Councillors' desire not to have them, the Council has decided not to bring forward a strategic policy to enable the designation of Areas of Parking Restraint in the draft Plan Strategy'.
- 6.9 We also note that Technical Supplement 9 refers to comments received during the POP stage which claimed that the public transport network wasn't strong enough to justify a reduction in parking and that others felt the town centres were already suffering from parking restrictions. Indeed, the DPS (at para. 9.1.33) also makes reference to '...the absence of an adequate public transport network'.
- 6.10 It is clear, having reviewed the dPS and its supporting documents, that there isn't any clear or up-to-date evidence which supports the proposal to not include any areas of parking restraint within the Borough against the advice of statutory consultees. As such the draft policy conflicts with soundness test CE2.
- 6.11 So far as the 'precise amount of parking' is concerned, we note that the specific characteristics of the proposed development, its location and Dfl's published standards are important considerations. However, the dPS fails to acknowledge other important considerations, these being occupier/market requirements and project/development viability.
- 6.12 Indeed, we would argue that these are as important as, if not more important than, the considerations contained within draft Policy TR6 with respect to determining the appropriate quantum of parking. We base this on the understanding that if developments are unviable or are do not achieve occupier/market requirements then this would seriously damage the deliverability and success of a development or lead to the delivery of a sub-standard development that will not be occupied. The Council's failure to adequately assess the wider effects of the draft Policy would conflict with soundness test CE1 and CE2.
- 6.13 We also note that it is difficult to determine what is to be regarded as an 'a dequate' provision of car parking, especially for the all-important speculative build component.
- 6.14 To ensure that an appropriate degree of flexibility is built into the dPS, and to ensure that future development proposals can deliver an attractive product that aligns with the site specific and operational requirements of occupiers, then TR6 should also include these components as factors that are to be considered by the Council when determining the 'precise amount of car parking'.
- In some instances, there may be a requirement to provide a higher level of car parking than what is currently provided for by draft Policy TR6 and Dfl's published standards. So, to ensure certainty, and to help de-risk potential investment, further clarification with respect to the 'exceptional circumstances' required would be beneficial. In its current form there is no clarity around how exceptional circumstances would be considered and therefore the draft policy would conflict with soundness test CE3.
- 6.16 To this end, we respectfully request, at the very least, that the draft policy TR6 includes an acknowledgment that if occupier/market requirements dictate a higher parking provision then this is something that will satisfy the exceptional circumstances test.

- 6.17 In the interest of certainty and to remove any potential confusion/inaccuracies in interpretation and to improve policy application/decision making with respect to draft policy TR6, we would respectfully ask the Council to amend the dPS to include clarity on the following matters:):
 - What is to be regarded as a 'highly accessible location' for policy TR6?
 - What is to be regarded as 'nearby' for a development to benefit from spare parking capacity?
 - Is the flexibility component associated with securing a broader planning gain/public benefit to be read as an 'and/or' or just 'and' scenario?
 - Paragraph 9.1.35 refers to 'a better quality development' and 'an appropriate design in a Conservation Area' as examples of broader planning gain further clarity is required on what would be considered a broader planning gain/public benefit.
 - What is to be regarded as an 'appropriate proportion' of reserved parking spaces for those with disabilities or impaired mobility?
 - What are the types of 'exceptional circumstances' that the Council is willing to accept in terms of allowing a parking provision in excess of the published standards?
 - What is to be regarded as an 'appropriate amount' of electric charging points?
- 6.18 Finally we note that the footnote to draft Policy TR6, references the 2005 Parking Standards provided by the Departments and the relies upon these as the policy standard. As such the draft policy would fail soundness test CE4 as it does not facilitate a flexible approach should the department publish revised parking standards.

Soundness Tests

- 6.19 Draft policy therefore TR6 fails to satisfy the following soundness test:
 - C3 Did the Council take account of policy and guidance issued by the Department
 - CE 2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;
 - CE 3 There are clear mechanisms for implementation and monitoring; and
 - CE 4 It is reasonably flexible to enable it to deal with changing circumstances.
- 6.20 The dPS does not contain nor is it supported by the required evidence base to justify the requirements of draft policy TR6, particularly the strategy around areas of parking restraint.
- 6.21 Draft Policy TR6 does not incorporate an appropriate degree of flexibility as it fails to identify all of the relevant factors which would inform a reasonable and balanced

- assessment under its provisions/requirements. It also fails to allow for revisions to department parking standards to be reflected in policy.
- 6.22 Finally, draft Policy TR6 does not contain clear mechanisms for implementation as further clarity is required for certain components to ensure certainty and to remove any potential confusion/inaccuracies in interpretation and to improve application/decision making.

Recommendation

- 6.23 To ensure that the DPS can be considered a 'sound' plan, we respectfully request that the Council:
 - prepares an up-to-date evidence base to support the variations to the existing policy provisions contained within PPS3 Policy AMP7; and
 - Provides further clarity on the policy criterion proposed within draft Policy TR6.

Draft Policy FRD4 Sustainable Drainage

- 6.24 Section 9.2 of the dPS sets out the Council's policy aims with respect to 'Flood Risk and Drainage' and it sets out a number of operational strategic subject policies, i.e. FRD1 to FRD6, which will assist in achieving these aims. Draft policy FRD4 sets out policy requirements and exceptions for sustainable drainage solutions (SuDS). It is clear from the dPS that the draft policy is intended to promote the use of SuDS and this is welcomed.
- 6.25 The dPS (at Para 9.2.6) claims that the '...policy aims [of the Flood Risk and Drainage section] fully embrace the... regional strategic objectives and guidelines for LDPs set out in the SPPS'. Paragraph 6.104 of the SPPS sets out the regional strategic objectives for the management of flood risk which includes encouragement of the use of sustainable drainage. Paragraph 6.118 then goes on to state:
 - "in managing development, particularly in areas susceptible to surface water flooding, planning authorities should encourage developers to use sustainable drainage systems (SuDS) as the preferred drainage solution."
- 6.26 We note that the policy wording in the SPPS identifies a preference for SuDS, whilst the draft Policy in the dPS is enforcing the use of the sustainable drainage. We would suggest that the approach set out within the dPS provides no flexibility as it would require all developments of 10 or more units to provide for SuDS unless the site is unsuitable. Paragraph 9.2.44 of the dPS states:
 - "Where an applicant considers a site to be fundamentally unsuitable for SuDS, the reasons for this must be set out in the Drainage Assessment and supported by a suitably qualified engineer."
- 6.27 This would indicate that only technical drainage reasons can be used to challenge the suitability of a site for SuDS. As drafted, the policy also fails to consider the implications on development viability for smaller schemes. As such it is considered that the draft Policy would conflict with soundness test CE2 and CE4.

6.28 Part two of draft Policy FRD4 states:

"planning permission will not be granted until the applicant has satisfied the Council that suitable arrangements will be put in place for the future management and maintenance, in perpetuity, of SuDS required under this policy. A Section 76 planning agreement may also be sought."

6.29 It is unclear from the dPS what is meant by 'management and maintenance' and the supporting justification and amplification text provides little more clarity. Paragraph 9.2.42 of the dPS states:

"An appropriate maintenance and management plan for SuDS will be required to be submitted with the planning application to ensure continuity in the future operation of SuDS by, for example, a property management company or for adoption by Council or another public authority. This planning will be required to be agreed with the Council and may involve a S76 planning agreement where necessary to ensure effective ongoing maintenance."

- 6.30 It is our understanding that there are currently no management companies within Northern Ireland who would take on the management and maintenance of SuDS. Furthermore, to date NI Water has not be open to adopting soft SuDS and we are not aware of the Council confirming that they would adopts SuDS as indicated in the dPS. Given the lack of assurance around the adoption of SuDS it is unclear how, or if, this policy will be implemented.
- 6.31 Furthermore, the policy requires maintenance in perpetuity. No consideration has been given to the burden of such a requirement on the developer and potential onward cost for the end users. Costs associated with maintenance and management could render smaller developments unviable.
- 6.32 As such the draft policy conflicts with CE2, CE3 and CE4.

Soundness Tests

- 6.33 Draft policy therefore FRD4 fails to satisfy the following soundness test:
 - C3 Did the Council take account of policy and guidance issued by the Department
 - CE 2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;
 - CE 3 There are clear mechanisms for implementation and monitoring; and
 - CE 4 It is reasonably flexible to enable it to deal with changing circumstances.

Recommendation

6.34 It is recommended that this draft Policy is withdrawn and that the Council relies upon the prevailing policy on SuDS contained within the SPPS.

Appendix 1: POP Submission on behalf of ACC

Mid & East Antrim Local Development Plan Preferred Options Paper Response Antrim Construction Company – Oldpark

Road/Sand Road, Ballymena

September 2017



MEA-DPS-070

Contents

Executive Summary			
1.	Strategic Response		
2.	Site Specific Response		
Appen	dix 1: Site Location Plans		
Appen	dix 2: Concept Plan		

Michael Gordon Michael.gordon@turley.co.uk

Client

Antrim Construction Company

Our reference

ANTB3001

6 September 2017

Executive Summary

- 1. Antrim Construction Company (ACC) welcomes the opportunity to engage with the Council's LDP preparation at this early stage.
- 2. The delivery of housing is fundamental to the achievement of sustainable communities, as well as bringing attendant economic benefits. ACC can make a practical contribution to achieving the Council's strategic housing objectives through the delivery of housing in sustainable locations.
- 3. A sharp focus on the delivery of necessary housing in the right places requires careful analysis of the performance of sites which make up the existing housing land supply.
- 4. On the basis that it is necessary to identify additional lands to ensure the housing needs of the Borough are met, ACC has identified lands on the edge of Galgorm which could be brought forward to meet a range of housing needs, including a retirement element.
- 5. We look forward to participating in the remainder of the plan making process.

i

1. Strategic Response

Do you agree with the Vision for the LDP?

- 1.1 The proposed vision for the LDP is:
 - "Mid and East Antrim will be shaped by high quality, sustainable and connected places for people to live, work, enjoy, invest and visit, so as to improve the quality of life for all."
- 1.2 We support the vision from the Council to develop a sustainable and well connected district. This vision is founded on the three pillars of sustainable development. The objectives set out on page 41 of the POP elaborate on these further.

Do you agree with our LDP Strategic Objectives?

- 1.3 We support the approach taken in establishing objectives for each of the pillars of sustainable development. The delivery of housing is identified as a key social objective and this is welcome. We support the objective to:
 - "Provide a sufficient supply of land for new housing by 2030 in convenient locations to meet general housing needs."
- 1.4 In practice we would encourage the Council to understand this objective to mean going beyond the supply of land and connect it's development management activity to ensure that planning permissions for housing developments are processed as quickly as possible to ensure that build rates can be enhanced across the district.
- 1.5 We also support the objective to:
 - "Meet the diverse range of specific housing needs and anticipated changes over the Plan period."
- 1.6 We would, however, stress that housing land should be identified in suitable locations. That is, land should be identified in locations where there is a market or social demand for housing. This will ensure that land is developed and therefore the objective is achieved. We would also highlight that land should be suitable for housing development, in that residential development should be feasible and viable.
- 1.7 It is our view that the delivery of housing will also assist in supporting the delivering of other key social objectives identified in the POP, namely:
 - "To development the particular strengths of Ballymena, Larne and Carrickfergus, so as to enable them to realise their full potential as the main centres of population, employment and services in Mid and East Antrim;

To support the role of small towns, villages and small settlements as local service centres and commensurate with their place in the settlement hierarchy;

To improve community safety and cohesion through the layout and design of new housing and other development; and

To facilitate the provision and integration of public open space within housing developments and linked open spaces within and beyond the wider urban fabric."

- 1.8 In addition to supporting the social objectives of the LDP, the delivery of housing can also make a significant contribution towards the delivery of the economic and environmental objectives. In providing homes within the Borough the population is retained within the district which supports its economic growth. Furthermore the Council's own preparatory paper¹ demonstrates that c. 2,240 people are currently employed in the construction sector. The construction of housing, and other forms of development, will continue to support this sector.
- 1.9 In relation to the environmental objectives, the identification of land in suitable locations is important in ensuring that environmental assets are protected. The suitable of location of housing also promotes sustainable forms of development and open space provided as part of residential development will contribute towards the district's green infrastructure.

Do you agreed with our Preferred Option to securing developer contributions from landowners and/or developers?

1.10 The Council's preferred options is to:

"Provide strategic policy of developer contributions through the Local Development Plan."

- 1.11 The supporting text indicates that a policy would be developed which will establish the type and thresholds of development that would trigger a requirement for a developer contribution. The text also indicates that the anticipate level of contribution will be identified within a policy.
- 1.12 We recognise that the SPPS² promotes the use of developer contributions but would stress that these should only be sought from developers in relation to costs associated with works required to facilitate their development and where:
 - A proposed development requires the provision or improvement of infrastructural works over and above those programmed in the LDP;
 - Earlier than planned implementation of a programmed scheme is required;
 - A proposed development is dependent upon the carrying out of works outside the site; and
 - Archaeological investigation or mitigation is required.

¹ Mid & East Antrim Local Development Plan Preparatory Studies, Paper 3: Employment and Economic Development, Appendix B – Employment by Industry (February 2015) ² SPPS Paragraph 5.69

- 1.13 It is therefore important that the LDP clearly identifies what infrastructure schemes will be programmed and their timeframes.
- 1.14 The Department's guidance³ on Section 76 Planning Agreements does indicate that policies for use of planning agreements should be considered within the LDP. The same document states that this:

"creates an opportunity to involve the local community and development industry in the process of policy development and to clarify at the earliest stage the expected nature, scope and levels of contributions that may be sought from developers."

- 1.15 It is therefore important that more detail on the nature and scope of developer contributions are set out in the preparation of the plan in order for comment to be made. However, at this stage we would highlight that this should be determined based on sound consideration of:
 - Infrastructure requirements that will be generated as a result of future development;
 - Existing infrastructure deficits;
 - Costing analysis for the delivery of infrastructure; and
 - Viability of development sites.
- 1.16 Furthermore, the Council will need to liaise closely with and establish partnerships with infrastructure providers to ensure that developer contributions are feasible. We would reiterate that the Department clearly states that:

"It is important that all planning agreement policies are informed by a sound and robust evidence base."

1.17 To date the council has not provided any evidence base in support of the introduction of such policy. The lack of such evidence could jeopardise the soundness of the LDP.

Do you agree with the Spatial Growth Strategy proposed for our Borough?

- 1.18 The Council's spatial growth strategy for the LDP takes account of the RDS. The strategy will focus major population and employment growth within the three main towns whilst facilitating appropriate levels of growth for the small towns and sustaining rural communities.
- 1.19 We support the approach that the main focus of growth will be the main towns of Ballymena, Larne and Carrickfergus albeit small towns should also see appropriate levels of growth. The spatial strategy should determine the extent of housing and economic land that is zoned within each settlement.

³ Development Management Practice Note 21 – Section 76 Planning Agreements

Do you agree with our Preferred Option for allocation housing growth across the Borough?

- 1.20 The Council is proposing a housing requirement of 6,230 new homes across the 15 year plan period. This requirement is based on the HGI published in April 2016 and represents a significant reduction from the previous HGI. The POP does not include any consideration of alternative housing requirements and as such fails to present options for consideration. This approach is unsound as there is no evidence of the options considered within the POP and no robust evidence of how the proposed requirement has been derived.
- 1.21 The use of the HGI places an unnecessary limitation on growth ambitions for the Council. The Council acknowledged that HGIs are not ceilings or targets and are a guide for the preparation of the LDP. The Council should be more ambitious in pursuit of its vision and growth aspirations than the HGIs. Against the proposed housing requirement, there appears to be a large supply of undeveloped zoned land remaining, however, the conclusion that there is a limited requirement to find additional supply seems to be founded on an un-evidenced assertion that every house in the Housing Monitor can be relied upon to be delivered within the Plan period.
- 1.22 Whilst Housing Monitor information is provided on a settlement level to give an indication of remaining supply there is no evidence presented at a site by site level to demonstrate that all committed sites (zoned and/or consented) are suitable and can be delivered, indeed the evidence provided by a comparison of successive housing land availability reports would suggest that there are several large sites in each of the main towns which have so far failed to deliver any housing whatsoever. The table below identifies (only) sites capable of yielding 100 or more houses where development has not started. Whilst each of these zoned/committed sites must be treated on its own merits and in some instances their locations within the urban footprint and relative to existing areas of housing would strongly militate against any 'dezoning', the Council's analysis of its effective housing land supply should be informed by the type of trend tracking envisaged by the Plan-Monitor-Manage approach set out in PPS12.

Town	HLA 2016 Ref	Type of Site	Available/Remaining
			Potential
Ballymena	2694	Zoned	150
	2730	Zoned	405
	2732	Zoned	230
	2737	Zoned	718
	2741	Zoned	159
	14419	Whiteland	120
			1782
Carrickfergus	17818	Zoned	175
	17820	Zoned	475
	18073	Zoned	285
	19902	Redevelopment	176
	20853	Zoned	164
	20968	Zoned	125
	20970	Zoned	322
			1722
Larne	2614	Zoned	291
	2619	Zoned	102
	2621	Zoned	112
	2637	Zoned	248
	13706	Zoned	303
	13730	Zoned	121
	14890	Zoned	150
	15217	Redevelopment	184
			1511
3 Town Total			5015

- 1.23 The POP indicates that there is a potential existing land supply to deliver 8,390 dwellings across the plan period, with supply of 5,955 across the main towns. However detail of the Urban Capacity Study referred to is not available so it is unclear whether it has been prepared according to latest Best Practice in respect of Housing and Economic Land Availability Assessment (HELAA), with a focus on 5 year land supply and deliverability.
- 1.24 We would also highlight that against a general housing requirement of 6,230 dwellings, a social housing need of 2,359 dwellings has been set. This would equate to some 38% of the overall housing requirement for the Borough. Given the level of social housing and affordable housing need, and the Council's proposed introduction of an affordable housing requirement for market housing, this could place an unnecessary restriction of the delivery of market housing depending on the planning approach taken. In order to help achieve the levels of affordable housing through contributions on site the overall housing allocation for the borough could be increased. Furthermore an increase in the housing requirement for market housing will assist in improving affordability.

Do you agree with our Preferred Option for allocating housing growth across the Borough?

- 1.25 The Council is proposing to distribute housing requirements for each settlement based on the current proportion of households living in main towns and small towns at the time of the 2011 Census and increase the percentage of housing growth allocated to villages and small settlements.
- 1.26 The risk of this approach is that it could perpetuate an unsustainable pattern of growth which would run counter to the RDS Strategy to focus growth in main urban hubs.

Do you agree with out Preferred Option for addressing social/affordable housing need within the Borough?

1.27 The Council is proposing to:

"zone sites solely for social/affordable housing in the Local Policies Plan and include key site requirements where a proportion of a general housing zoning should be provided as social housing, where a need has been identified. In addition set out a strategic policy requiring that every tenth unit within new housing developments, in settlements where a need has been identified, shall be a social housing unit."

- 1.28 Whilst we recognise the need for affordable housing we would stress the importance of ensuring that a robust evidence base is provided in support of such a policy approach. It is important when considering such policies to have regard to the impact of an affordable housing requirement on the viability of market housing sites. Such implications should be considered when zoning land to ensure that land zoned for housing is deliverable.
- 1.29 Any such policy requiring affordable housing should only be applicable where a need is identified. This should be key factor in the Annual Monitoring Report and appropriate flexibility should be incorporated into policy wording.

2. Site Specific Response

Site Promotion

- 2.1 The land at Old Park Road (see maps at Appendix 1) is situated between the Old Park Road to the west and Sand Road to the east.
- 2.2 Immediately south of the site are the established housing developments of Woodcroft Hollow, Woodcroft Hill and Woodcroft Brae which consist primarily of one and a half storey/ two storey detached dwellings.
- 2.3 The site comprises a patchwork of agricultural fields and extends to some 17.16 ha (42.41 acres). Ground levels rise gently from Sand Road to a central point along the northern boundary, marked by a single dwelling accessed via a laneway, levels fall from here to the south. The site sits slightly below road level to the Old Park Road, undulating gently and generally rising to its central point. There are a number of mature hedgerows within the site, notably along the north-west boundary, surrounding the single dwelling.
- 2.4 Properties facing the site along the Old Park Road are a mixture of bungalows in single plots and the rear boundaries of the large detached properties of Old Park Manor/Old Park Avenue. To the Sand Road the developments of Fairyhill and Sandmount provide the immediate development context.
- 2.5 Galgorm Village, with its local centre, employment, community, sporting and recreation facilities is approximately 0.6km to the south west. Whilst located within the development limits of Ballymena, the village retains a distinct identify of its own and has proven to be a popular area to build and buy houses, with almost all of the Ballymena Area Plan housing zonings having been built out.

Proposal

- 2.6 A Concept Plan has been prepared (see Appendix 2) for the site which demonstrates how the identified lands could be developed. The lands which are illustrated for development in the Concept Plan would extent the edge of the urban area to a logical and defensible limit, taking into account the location of existing development on the Sand and Old Park Roads. This edge of Galgorm presents in such a way that there are various options available should the Council agree in principle to allocate additional housing land in the area, including both larger and smaller areas of land than that shown for development in the Concept Plan.
- 2.7 This is a sustainable location, in close proximity to the Galgorm village centre to the south west, to local amenities and to local public transport links along the Galgorm Road, Sand Road and Old Park Road. A housing allocation of this scale at this location would represent an opportunity for a further round of residential development at a well established location with no obvious planning constraints and without extensive urban sprawl.

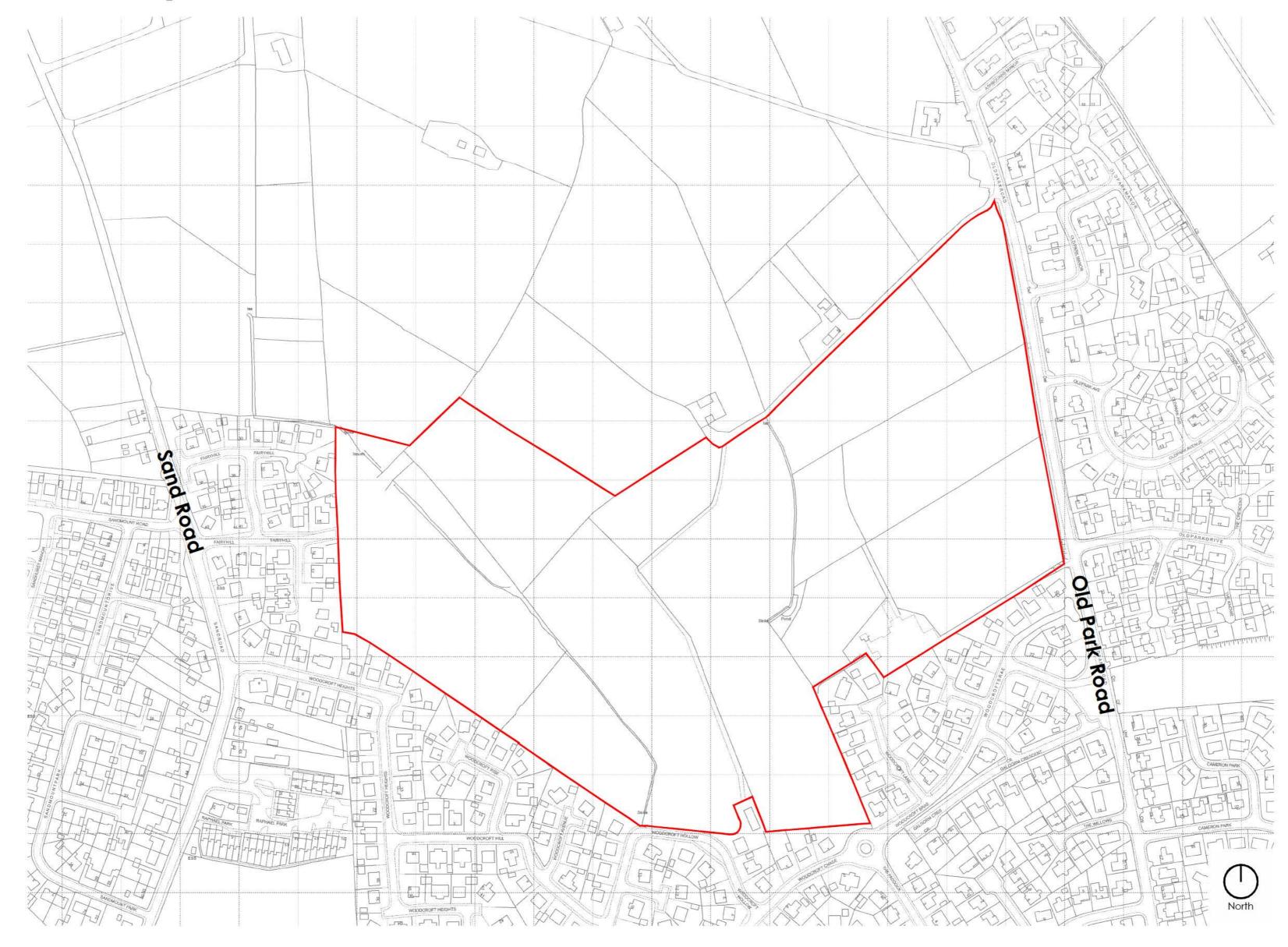
MEA-DPS-070

- 2.8 The site illustrated in the Concept Plan has the potential to accommodate a mix of house types and tenures, including market housing, social housing, affordable housing and retirement living.
- 2.9 The Concept plan demonstrates how the different elements of residential development could be accommodated, along with appropriate amenity open space and landscape buffers, within an overall networking concept linking the different development areas to one another.
- 2.10 To the northeast off Old Park Road, the concept boundary follows an existing laneway as a logical development limit. There is ample frontage to Old Park Road to achieve a new access for this side of the development. The proposed development would sit behind the existing Fairyhill development off Sand Road from where access can also be achieved. In addition, access to the central part of the site may be available from Woodcroft.
- 2.11 ACC have a good appreciation of the local housing market in Galgorm and are confident that the site could deliver approximately 25-30 completions per year. Their intention would be to make a planning application at the earliest opportunity and commence construction as soon as practically possible thereafter.

Appendix 1: Site Location Plans

Site Location Plan

Proposals for Residential & Retirement Living Old Park Road, Ballymena



Ref|F4373-050-01-001 :: Scale 1:2500 @ A2 :: Drawn|JC :: Date|August 2017

Site Area 42.41 acres (or 17.16ha)



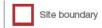
MEA-DPS-070 Tullaghgarley Bridge

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Client Antrim Construction Company

Project

Oldpark Road / Sand Road, Ballymena

Drawing Site location plan

Project No. ANTB3001 Final Drawing No. 1001 Scale 1:10,000 @ A4

Revision 00 Date August 2017



Appendix 2: Concept Plan

Proposals for Residential & Retirement Living Old Park Road, Ballymena

Illustrative Development Proposal



Ref | F4373-050-03-001~RevA :: Scale 1:2500 @ A2 :: Drawn | AWP :: Date | August 2017



MEA-DPS-070

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MEA-DPS-070

Appendix 2: Review of Sustainability Appraisal (Turley Sustainability)

A Review of the draft Sustainability Appraisal accompanying the Mid and East Antrim Draft Plan

December 2019

A review of the Sustainability Appraisal supporting the Mid and East Antrim Borough Council LDP Draft Plan Strategy 2030.

- 1. A review of the Sustainability Appraisal (SA) documents produced in support of the Mid and East Antrim (M&EA) Local Development Plan (LDP) Draft Plan Strategy September 2019 has been undertaken.
- 2. The documents that have been reviewed are;
 - 1.2.1 Mid and East Antrim District Council Local Development Plan 2030, Draft Plan Strategy, September 2019 (hereafter referred to as the dPS).
 - 1.2.2 Mid and East Antrim District Council Local Development Plan, Sustainability Appraisal (hereafter referred to as The Draft SA Report) of the LDP Draft Plan Strategy Incorporating the Strategic Environmental Assessment, September 2019.
- 3. For Northern Ireland the relevant guidance with respect to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is;
 - 1.3.1 Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 (the EAPP Regulations); and
 - 1.3.2 Development Plan Practice Note. Sustainability Appraisal incorporating Strategic Environmental Assessment. April 2015.
- 4. Given the complexity of the SA process and the experience (including relevant case law referenced in these representations) of its application in England, Scotland and Wales, it is also recommended by the guidance above to refer to the following guidance where necessary;
 - 1.4.1 A Practical Guide to SEA. Department of Communities and Local Government, September 2005
 - 1.4.2 National Planning Practice Guidance. Strategic environmental assessment and Sustainability appraisal. (http://planningguidance.communities.gov.uk/).
 - 1.4.3 SEA and SA; Planning Practice Guidance (PPG); Ministry of Housing, Communities & Local Government (HCLG); February 2015;
 - 1.4.4 Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans; RTPI; January 2018; and

¹ https://www.planningni.gov.uk/index/advice/practice-notes/dp_practice_note_4_sa.pdf. Page 42.



- 1.4.5 SEA & Climate Change: Guidance for Practitioners; Environment Agency; 2011.
- 5. We are fully supportive of the principles of sustainable development and the need to positively tackle the climate crisis by ensuring that new housing is allocated in the most sustainable locations to encourage the use of sustainable modes of transportation for commuting and travel.

Concerns relating to the SA process

- 6. Our overriding concern with the dPS and the SA process is that the policies have failed to allocate sufficient housing to the main settlements, which therefore risks undermining the Spatial Development Strategy's intent to achieve sustainable development and focus major population growth in the larger urban centres with their own economic activity to justify additional housing to reduce commuting to and from these settlements.
- The SA is a fundamental part of the plan making process with its fey function being²: 7.
 - The purpose of SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation plans and programmes such as local development plans.
- 8. Achieving sustainable development within the M&EA plan area means improving the economic, social and environmental performance of the plan and the district through the consideration and identification of reasonable alternatives to plan policies. One of the most effective mechanisms for the dPS to secure this goal for the housing sector is the ability to locate as much housing as possible as close as possible to the main urban centres to reduce the need for private car travel and encourage the use of sustainable modes of transportation.
- 9. The identification of the most sustainable locations for housing is assessed through a number of draft policies which have been reviewed below.

Draft Policy - SGS1 Spatial Growth Strategy

- 10. The aim of Draft Policy SGS1 is to manage growth within the M&EA plan area in a sustainable manner. The draft Policy has established a hierarchy whereby growth will be located in the 3 main towns of Ballymena, Carrickfergus and Larne whilst facilitating appropriate growth in the smaller villages and settlements.
- 11. Representations submitted to the dPS by Turley Planning suggest that the percentage increase sought to Ballymena is only circa 3.5% with historical data suggesting that the proportion of residents within Ballymena relative to the district has been falling since at least 2008 thereby indicating that insufficient housing has been allocated to this area.
- 12. There is ample evidence for a marked further increase in housing allocation within the dPS. Ballymena is identified as being a Main Hub in the Regional Development Strategy (RDS) 2035 with the potential to cluster with Antrim and Larne. The RDS 2025 recognised Ballymena, Omagh and Newry as Main Hubs that have a well-established sub-regional role and more extensive

https://www.planningni.gov.uk/index/advice/practice-notes/dp_practice_note_4_sa.pdf. Paragraph 3.1



sphere of influence reflecting their larger size and the availability of a wide range of higher order urban functions. Such centres were 'expected to generate higher levels of future growth reflecting their established role and strength as local engines of economic activity in their respective subregions' (RDS 2025 p48). Whilst the RDS has been reviewed, the essential characteristics of Ballymena have not changed.

- 13. Technical Supplement 2 (TS2), Appendix B identifies Ballymena as a highly sustainable location:
 - Ballymena benefits from an excellent location on the edge of the BMUA with easy access to the International and City airports and Ports of Larne and Belfast. It has a significant retail centre which is complimented by nearby tourism attractions, including the Causeway Coast and Glens.
- 14. Section 3.2.1 of the draft SA presents the summary of the assessment of draft Policy SGS1 to which we have the following comments:
 - The draft SA confirms that no reasonable alternatives have been considered for this policy
 as it is considered to uphold the principles of the Regional Development Strategy (RDS)
 Framework. Table 5.1 of TS 3 (Housing) indicates that overall percentage of housing to be
 allocated under the preferred option is 62% (an increase of only 3.5%) to the main towns.
 - Representations by Turley Planning demonstrate that there is a strong justification for Carrickfergus to be viewed more positively given its location within the Belfast Metropolitan Urban Area, thereby justifying a greater potential of housing.
 - Appendix B of TS2 (Settlement Hierarchy) describes Larne as:
 - Larne is situated in a strategic coastal location. It provides strong linkages between NI
 and Scotland. Its road and rail links form part of the Trans-European Networks. Its
 position on the Causeway Coastal Route has potential to create a centre for tourism
 - Given the strong description of Ballymena as an economically active retail destination, the consideration of Carrickfergus within the BMUA and the view that Larne is a potential tourist hub, we believe there is ample justification to consider reasonable alternatives to the distribution of housing between the three main towns. Under this scenario it is reasonable to suggest that the greater majority of housing within the three main towns should go to Ballymena and Carrickfergus as Larne (given its function as a tourist hub) does not justify the same percentage of housing compared to key economically active towns.
- 15. Page 142 of the draft SA presents the summary of the assessment of draft policy SGS1 against the SA Framework for which we have the following comments:
 - The SA scores a minor positive impact against SA Objective 5 (sustainable economic growth) as a result of the strategy. We believe that this scoring reflects a lack of ambition from M&EA District Council as, given the importance of the main towns as economic hubs, further housing and employment allocations should be made to create a major positive benefit to sustainable economic growth.
 - The SA Scores a major positive impact upon SA Objective 8 (sustainable travel) as a result of the allocations within the main towns. Representations within this document and by



Turley Planning confirm that insufficient housing has been allocated within the dPS and that reasonable alternatives should have been considered to different allocations of growth between the three main towns. Given that draft Policy SCG1 only directs circa 63% of housing to the main towns, the **major positive score is unwarranted** given that just greater than half of the total housing allocation is being directed to the most sustainable locations.

• The SA scores an uncertain effect against SA Objective 10 (Climate Change) which is disappointing given the critical role that housing allocations can have with respect to reducing carbon emissions through private vehicle use. We believe that the dPS should allocate additional housing in both Ballymena and Carrickfergus which would justify a minor positive score against this SA Objective as this would facilitate a reduction in private car use.

Draft Policy SGS2 - Settlement Hierarchy.

- 16. Draft Policy SGS2 presents the settlement hierarchy which guides the distribution of housing within the Plan Area. TS2 (settlement hierarchy) presents the evidence to support the hierarchy.
- 17. We fully support the identification of Ballymena as one of the three main towns able to accommodate the majority of the housing allocations. However, we believe that the evidence base should have considered the relative sustainability performance of the three main towns to enable further consideration of individual allocations.
- 18. We fully support the conclusion within Appendix 2 of TS2 which states that Ballymena is an economically active town and warrants inclusion within the main town category. However given the economic activity of Ballymena and Carrickfergus, further work should have been undertaken to characterise the relative sustainability of each of the three towns to guide individual allocations.
- 19. Page 146 of the SA presents the summary of the assessment of Policy SGS2 against the SA Framework to which we make the following comments;
 - The SA scores a major positive impact against SA Objective 5 (sustainable economic growth) as a result of the settlement hierarchy. We believe that this scoring is unwarranted given that Ballymena and Carrickfergus (key economic hubs) have not secured significant additional allocations above the base increase allocated to main towns. Whilst the principle of the settlement hierarchy is supported, the economic benefits of the strategy will not be secured. This reflects a lack of ambition from M&EA Council as, given the importance of these areas as economic hubs, further housing and employment allocations should be made to justify the major positive benefit to sustainable economic growth.
 - The SA Scores a minor positive impact upon SA Objective 8 (sustainable travel) as a result of the settlement hierarchy. Representations within this document and by Turley Planning confirm that, whilst the principle of the settlement hierarchy is supported, insufficient housing has been allocated within the dPS to secure even the minor positive impact. The dPS should be prioritising the location of housing to the most sustainable locations and it is disappointing to see this SA objective only securing a minor positive rating. We believe that, with additional allocation in the main towns, this objective should secure a major positive benefit to secure a shift in sustainable travel.



• The SA scores an uncertain effect against SA Objective 10 (Climate Change) which is disappointing given the critical role that housing allocations can have with respect to reducing carbon emissions through a shift private vehicle use to sustainable modes of transportation. We believe that the dPS should allocate additional housing in both Ballymena and Carrickfergus which would justify a minor positive score against this SA Objective.

Draft Policy SGS3 - Strategic Allocation of Housing to Settlements

- 20. Draft Policy SGS3 allocates the housing in accordance with the spatial distribution policy and confirms that only 991 dwellings of the total allocation of 4614 dwellings have been directed to Ballymena.
- 21. Section 3.2.3 of the draft SA presents the summary of the assessment of this policy and states that three different reasonable alternatives were tested for the distribution of housing within the Settlement hierarchy which secure the same score when tested against the SA Framework. We would like to make the following comments:
 - The description of the Option 1 (preferred option) is insufficient to allow a meaningful comparison with Options 2 and 3. Without a clear description of the additional housing allocated under Option 1 as a result of 'tailoring to reflect the capacity of the assessment' then the impacts of option 1 cannot be differentiated from option 2.
 - The SA scoring of these three options is also flawed given that it has resulted in exactly the same score for all three options considered which in itself suggests there is no meaningful difference between the three options. Option 1 appears in principle to be the most sustainable option given that it allocates growth but also considers the individual sustainability of each settlement within the relevant tier although the exact numbers involved are not confirmed.
 - To ensure this is a sound assessment, we believe that the difference in housing numbers between each option should be confirmed and reappraised. Within this appraisal it is anticipated that Option 1 contains a significant uplift in housing to Ballymena and Carrickfergus.

Draft Policy HOU5 - Affordable Housing in settlements.

- 22. Draft Policy HOU5 is the principle policy that guides the requirement for affordable housing in the settlements with a requirement of 20% for main and small towns.
- 23. Section 3.5.3 of the SA presents the assessment of this policy to which we have the following comments:
 - It is noted that no reasonable alternatives have been considered to the 20% requirement for main and small towns identified in the preferred option. There appears to be no specific evidence that justifies the 20% target or any evidence that alternative figures have been identified.
 - We fully support the need for affordable housing provision and are committed to ensuring that their development activities meet this need. However affordable provision is affected by a number of factors such as viability, infrastructure provision and local need. In the absence



- of evidence to support the 20% target, it is evident that this figure will change based on these factors.
- Given the above, the SA should have identified alternatives to the affordable housing provision (lower and higher than the preferred option) and tested these against the SA framework to identify the most sustainable option.

Summary of representations to the draft Mid and East Antrim Sustainability Appraisal

- 24. We have reviewed the draft SA and, have a number of concerns with respect to its soundness, compliance with the SEA Regulations and its effectiveness in achieving sustainable development within M&EA by focusing development within the major urban centres. Our concerns can be summarised as:
 - A spatial development strategy that does not recognise Ballymena and Carrickfergus as key economic zones and allocates a proportionally higher quantum of housing in this area
 - A settlement hierarchy which does not characterise the sustainability of individual settlements thereby facilitating a proportionate allocation for Ballymena and Carrickfergus.
 - A lack of reasonable alternatives to explore the sustainability of allocating different quantums of housing to the main towns and specifically Ballymena and Carrickfergus.
 - A lack of reasonable alternatives to test the most sustainable approach to the provision of affordable housing in M&EA
- To rectify these deficiencies, we recommend that further work is undertaken on the SA and subject to further consultation prior to the finalisation of the dPS.

Contact

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Appendix 3: September 2019 HGIs 2016-2030



Regional Planning Directorate

To

Heads of Planning (Councils)

Clarence Court 10-18 Adelaide Street BELFAST BT2 8GB

Tel: 0300 200 7830

Email: angus.kerr@infrastructure-ni.gov.uk julie.maroadi@infrastructure-ni.gov.uk

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

E-mail: planning@infrastructure-ni.gov.uk Website: 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 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 <u>all relevant sources of evidence</u>, 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



Housing Growth Indicators

2016-based



Housing Growth Indicators (HGIs) 2016 - 2030



WHAT INFORMS THE HGIS?



Household projections & current housing stock



Vacant stock, conversions, closures & demolitions



Second homes

Background to the HGIs

Housing Growth Indicators (HGIs) provide an indication of future housing need in Northern Ireland.

The indicators have been updated at the request of Regional and Strategic Planning within the Department for Infrastructure and are produced to provide guidance for those preparing development plans.

Household projections produced by NISRA form the basis of the estimate. The estimates are based on current population & household formation trends with the assumption that these trends will continue into the future.



Using the HGIs

These estimates are purely for guidance & should not be considered as a cap or a target on development, they present a robust starting point which can subsequently be adjusted taking account of the full range of factors that may influence housing requirements over the plan period. Various other factors will also have an influence on housing requirements over longer time periods.

They are intended to support the development process by giving an indication of where development is most likely to be needed given the current trends.



NI STOCK REQUIREMENT ESTIMATE FOR 2030



Contents

		Page
1.	Background to the HGIs	5
2.	Uses of the HGIs	5
3.	Northern Ireland Housing Growth Indicators 2016-2030	6
4.	User information – data sources	11
5.	Changes to data sources since 2012 based HGIs	13
6.	Local Government District (LGD) level figures – 2016 based Housing Growth Indicators	15
Арр	pendices	
1.	LGD level Northern Ireland Housing Growth Indicators 2016-20 – estimating each of the 5 key components	16
2.	Comparison of LGD level Housing Growth Indicators 2016-30 with recent new dwelling completion rates	19
3.	Useful links	20

1. Background to the HGIs

- 1.1. Housing Growth Indicators (HGIs) provide an indication of future housing need in Northern Ireland. Household projections produced by NISRA form the basis of the estimate. The estimates are based on current population/household formation trends with the assumption that these trends will continue into the future.
- 1.2. As population and household formation projections are regularly updated and housing stock data presents the most up to date position annually, the HGIs should be used for guidance. The estimate does not take account of any future policy development or social factors and, as such, should not be considered a target or seen as a cap on housing development in the area.
- 1.3. Following a public consultation, an agreed methodology was established in 2005. This methodology has been replicated as closely as possible for all HGI updates since, including this latest 2016 based update. The variables that make up the HGI calculations have been updated using the most recently available information from robust sources. The 2012 based update of the HGIs contains more detailed information on the earlier applications of the methodology and can be found at https://www.infrastructure-ni.gov.uk/publications/2012-based-housing-growth-indicators-hgis-and-methodology-paper.
- 1.4. In addition to the household projections which are considered the main component of the HGIs, data on vacant housing stock, second homes and net conversions/closures/demolitions (net stock loss) are also used to produce the final estimates. As new, updated data was available for household projections, housing stock, vacant stock and second homes, updating the HGIs at this time is in line with the commitment to refresh estimates when updated household projections are published. This update ensures that any decision making or planning taken forward can be supported by the most robust, up-to-date information as evidence.
- 1.5. A number of updates of the HGIs have been produced, including being part of the first Regional Development Strategy which was published in 2001. Housing Growth Indicators were last published in May 2016 for the time period 2012-2025. The household projections used for these HGIs were based on 2012 data. The latest HGIs use 2016 based household projections and have been calculated for the time period 2016-2030 to align with the timeframe for the majority of Local Development Plans.
- 1.6. The HGIs have been calculated for Northern Ireland and also for each of the 11 Local Government Districts (LGDs). Further detail on how the HGIs are calculated, user information and methodology is presented throughout this document.

2. Uses of the HGIs

2.1. The indicators have been updated at the request of the Department for Infrastructure Planning Group and in line with the commitment to refresh estimates when updated household projections are published. They are produced primarily to provide guidance for those preparing development plans. They are intended to support the development process by giving an indication of where development is

most likely to be needed given the current understanding of population, current data on the housing infrastructure and expected population growth. As mentioned above, these estimates are purely for guidance and should not be considered as a cap or a target on development and, as such, represent a robust starting point which can considered while also taking account of the full range of factors that may influence housing requirements over the plan period in terms of how many houses are needed in any area.

3. Northern Ireland Housing Growth Indicators 2016-2030

- 3.1. Following a period of gathering the required data from a variety of sources (detailed on paragraph 3.7 and also section 4); examining the previous methodology; confirming with Planning representatives on a way forward for the 2016-based update; and engaging in various meetings and conversations with subject experts, Analysis, Statistics and Research Branch within the Department for Infrastructure took forward HGI calculations using the most recent available data.
- 3.2. Once the data analysis was complete, the updated HGI figures calculated for the period 2016-2030 show that the estimated new dwelling requirement in Northern Ireland for the period is:

84,800

3.3. As well as calculating an updated estimate for Northern Ireland, estimated dwelling requirements for the 11 Councils were also produced.

Table 1: Estimate of total housing need in Northern Ireland by Council 2016-2030¹

Council	2030 estimated dwelling requirement
Antrim and Newtownabbey	4,200
Ards and North Down	5,500
Armagh City, Banbridge and Craigavon	17,200
Belfast	7,400
Causeway Coast and Glens	5,600
Derry City and Strabane	4,100
Fermanagh and Omagh	4,300
Lisburn and Castlereagh	10,700
Mid and East Antrim	5,400
Mid Ulster	10,300
Newry, Mourne and Down	10,000
Northern Ireland	84,800

¹ Estimates are rounded to the nearest hundred. Totals may not add due to rounding.

- 3.4. This report and its appendices provide further detail on the methodologies, data used and further insight into how these estimates have been produced. As mentioned previously, these estimates are an indication of likely need and should not be considered as a definitive target. The social and policy environment is likely to be subject to much change over the next decade and these estimates are modelled from currently available data. There has been no attempt to model future events into these estimates, so the data presented should be considered 'policy neutral'.
- 3.5. However, these should be considered as 'a best estimate' given the data available at this point in time. Data used has been obtained from professional, reliable sources and the updated HGIs have been developed by NISRA statisticians based on an agreed methodology, in consultation with subject experts. A number of

- potential sources were considered and a sound, consistent rationale was employed to make the decisions that formed the final estimate calculations.
- 3.6. The variables informing the calculation of the Northern Ireland estimate are shown in Table 2 and this largely reflects the methodology that was used in the 2012 based HGIs.

Table 2: Variables that comprise 2016-2030 HGIs1

Variable		Year of data	Value	Notes
(A)	Number of households	2030	784,600	2016 based NISRA household projections (occupied stock)
(B)	Second homes	2030	8,700	1.11% of occupied housing stock. NISRA Central Survey Unit combined survey sample
(C)	Vacant stock	2030	57,000	6.70% of total housing stock. NISRA Central Survey Unit combined survey sample
(D)	Net conversions/ closures/ demolitions	2016 to 2030	11,100	Net stock loss estimated using LPS housing stock and new dwelling completions data. Based on 9 year average.
(E)	New stock requirement estimate at end of period	2030	861,400	Sum of (A), (B), (C), & (D)
(F)	Total stock at start of period	2016	776,500	LPS Northern Ireland Housing Stock data www.finance- ni.gov.uk/publications/annual- housing-stock-statistics - stock at beginning of 2016/17
(G)	Projected new dwelling requirement	2016 to 2030	84,800	(E) minus (F)
(H)	Projected new annual dwelling requirement		5,700	

¹ Estimates are rounded to the nearest hundred. Totals may not add due to rounding.

3.7. Further information on the data sources used and changes compared to the previous 2012 based HGIs is available in 'User Information – data sources' (page 9) and 'Changes to data since 2012 HGIs' (page 11). However, at a basic level, the detail of each variable listed above is as follows.

Number of households 2030 (A)

The estimate of the number of households in 2030 of 784,600 comes from the 2016 based household projections produced by NISRA, available at this link.

Second homes 2030 (B)

The term 'second home' used in this calculation relates to a dwelling, not permanently occupied, whose owner resides principally in another dwelling. This includes holiday homes and residences used for easy access to business, but excludes dwellings privately rented to other tenants. Following review of the previous potential sources for this update only one robust data source for second homes data was identified: the NISRA Central Survey Unit (CSU) combined survey sample 2016-17, which provides a factor of 1.11% (see 'Changes to data since

2012 HGIs' section (page 11)). Applying the CSU second homes factor (1.11%) to the data gives an estimated second homes figure of 8,700 in 2030.

Vacant stock 2030 (C)

Two possible data sources were identified for these data: the NI House Condition Survey 2016 (NIHCS) and the CSU combined survey sample 2016-17 (see 'User Information – data sources' (page 9)). In the NIHCS 2016, the proportion of vacant properties was 3.65%. In the CSU combined survey sample 2016-17, this proportion was 6.70%.

To maintain consistency with the data used for second homes, the NISRA CSU data was also used as the source for this variable and this results in an estimated vacant stock figure of 57,000 in 2030.

Net conversions/closures/demolitions 2016 to 2030 (D)

Estimates were produced, using housing stock numbers and new dwelling completions data from Land and Property Service (LPS) (see 'Calculation of estimates' section on page 12). These estimates suggest a figure of 741 stock loss per annum.

New stock requirement estimate 2030 (E)

This is calculated by adding the estimated number of second homes (B), vacant stock (C) and stock loss adjustment (D) to the estimated number of households (A). This results in a stock requirement estimate of 861,400 in 2030.

Total stock 2016 (F)

The LPS publication 'Northern Ireland Housing Stock' reports on data from the NI Valuation List (see 'User Information – data sources' on page 9). At April 2016, total NI housing stock was 776,500.

Projected new dwelling requirement 2016 to 2030 (G)

This is calculated by subtracting the 2016 total stock figure (F) from the 2030 total stock estimate (E).

3.8. Development of the updated HGIs based on the variables as outlined above results in a projected new dwelling requirement of 84,800 between 2016 and 2030 (approximately 5,700 per annum). While past trends are not necessarily an indicator of future trends and house building is not a linear, constant development, it is worth considering the projected annual requirement against recent numbers of new dwelling completions in Northern Ireland. In the past 9 years these are as follows (https://www.finance-ni.gov.uk/publications/new-dwelling-statistics-report):

2010-11	6,213
	•
2011-12	5,719
2012-13	5,526
2013-14	5,315
2014-15	5,501
2015-16	5,771
2016-17	6,463
2017-18	7,096
2018-19	7,809

So a figure of around 5,700 per annum is a broadly central point amongst these nine annual figures and as such the updated HGI figure sits within the recent trend of completions over the past decade.

4. User Information - data sources

4.1. This section describes the data sources that were used or considered as part of the development process for the latest 2016 based HGIs. The decision was made early on in this refresh process to replicate the agreed methodology that was used for the 2012 based HGIs and, as far as possible, this is the process that has been employed. However, due to data quality or data availability at the time of this refresh, it is important to note that some data sources may have changed since the previous 2012 based HGIs were derived. This is fully discussed in the section 'Changes to data sources since 2012 based HGIs' on page 11. Generally any changes are due to lack of availability of the original data source or considerations related to consistency of data use across HGI variables.

4.1.1. NISRA household projections

Household projections are formed using population projections and household formation trends. The projected population is assigned into household groups using the trends in household formation from one Census to the next. The 2016 based household projections are based on the most up-to-date trend data on household formation between the 2001 and 2011 Census. 2016 based household projections data have been calculated for the 11 new LGDs.

The 2016 based data were used as the starting point for the HGI calculations.

4.1.2. NI Housing Executive House Condition Survey

The NIHCS is conducted by the NI Housing Executive (NIHE). A detailed technical survey is carried out on the interior and exterior of properties and, in addition, a short interview is conducted with the householder or their partner. The data are weighted and grossed to ensure final figures reflect the actual housing stock. The achieved sample size in 2016 was 2,023.

Data from the NIHCS 2016 were considered as a potential source to estimate the proportion of second homes and proportion of vacant houses. Advice was also sought from the research team in NIHE in support of the development of these updated HGIs and the producers of this report are grateful for that support and expert advice. During the conversations with NIHE, the advice provided was that due to small sample sizes, NIHCS data on second homes was not robust enough to be used to inform the HGIs. Therefore NISRA CSU data was used for second homes estimates. In the interests of consistency across the calculations, this provided a rationale for also using the NISRA CSU data for vacant stock estimates.

4.1.3. Land and Property Services (LPS) publications

Building Control new dwelling completions data

Figures are collected quarterly by LPS from Building Control offices in each council on the number of new dwellings that have been completed during that quarter. The date of a new dwelling completion is the date on which the building control completion inspection takes place. New dwellings include both houses and apartments.

New dwelling completions data were used in the calculations to estimate net stock loss.

Housing stock data - NI Domestic Valuation List

LPS publish housing stock figures based on their domestic valuation list. The data represents housing stock at a point in time usually in April. The download is taken on the first working day of the month. Housing stock data are available from 2008 to 2019 for the 11 LGDs.

Total housing stock data is one of the elements of the HGIs model. The data were also used in the calculations to estimate net stock loss.

4.1.4. NISRA Central Survey Unit combined survey sample

Central Survey Unit (CSU) has amalgamated samples from their main surveys which took place over each financial year from 2013-14. These are the complete samples that were selected from the LPS address database and so the data include properties that were found to be vacant or second homes when the interviewer went to visit. The combined sample for the year used in the HGI calculations (2016-17) includes 25,400 properties.

A sample size of 25,400 allows for data analysis at LGD level. Data on second homes and vacant properties have been used in the HGI calculations at LGD level and to confirm data used at Northern Ireland level. The data source is not an official estimate of data on second homes or vacant properties. It is a by-product of survey research and it is considered to be a representative sample of houses at Northern Ireland level and LGD level.

5. Changes to data sources since 2012 based HGIs

5.1. The changes outlined in this section include where a new data source has been used to calculate the HGIs and also if there have been any significant changes to a data source since the last HGIs were calculated. Looking at each of the 5 key elements in the Northern Ireland level HGI calculations:

5.1.1. Number of households

Data source: NISRA household projections (2016 based).

Changes to data

The latest household projections (2016 based) replaced the previous household projections (2012 based).

The 2016 based figures are lower than the 2012 based figures. As stated in NISRAs methodological paper, the main driving force behind the 2016-based projections being lower than the 2012 based projections is due to a lower population base. Similar findings are also found in household projections for countries in the rest of the UK and indeed for areas within Northern Ireland.

For further details of differences between the 2012 based household projections and 2016 based household projections, see <u>the methodology report</u> on the NISRA website ('Useful links' section on page 19).

5.1.2. Second homes/Vacant stock

Data source: NISRA CSU Combined Survey Sample 2016/17.

Changes to data

2016/17 figures from the NISRA CSU Combined Survey Sample replace the figures from the 2011 NIHCS. 2016/17 was considered the most relevant year for the 2016 based HGI update.

NIHE advice was that the NIHCS sample was considered too small to provide robust data for the second homes variable. Given that issue with regards to second homes and NIHCS data, it was considered that the preferred approach was to ensure consistency of data source across the calculations/relevant variables and as NISRA CSU data informed the second homes variable, the NISRA CSU data was also chosen to inform the vacant stock variable. Additionally, using vacant stock estimates provided by NIHCS and LPS lead to an overall gain in some LGDs, which would lead to an indicator suggesting no additional requirement of homes within these areas over the HGI estimate period. This issue also occurred in aspects of the 2012 based update and was a driver for variable decision making at that time. As this is a refresh of that 2012 method, the issue has been handled similarly.

5.1.3. Net conversions/closures/demolitions

Data source: Estimates produced using published LPS data on new dwelling completions and housing stock.

Changes to data

NIHE advice obtained on net demolitions, conversions and closures across NIHE stock suggested a figure of 200 per annum. Advice was also sought from LPS on available data. The LPS figures that were available represent all Northern Ireland housing stock so the decision was taken to give precedence to these estimates. The latest net stock loss estimate based on the average of the time series available (9 years (2010-11 to 2018-19) is 741 per annum. This results in an estimated stock loss of 11,100 dwellings over the period to 2030. The previous 2012 based HGIs used a 2 year average and an annual estimated stock loss of 1,000 but this update has used the full time series available to provide a more robust average to smooth out any volatility across the period.

Calculation of estimates

Housing stock numbers and new dwelling completions data from LPS were used to give some guidance on approximating net stock loss data. Estimates were produced as follows:

- Take housing stock at the beginning of the year (LPS NI Housing Stock publication) and add in new dwellings completed during the year (LPS NI Building Control Starts and Completions publication). If no net stock loss, this figure would be the total housing stock at the end of the year.
- Compare this estimated 'housing stock if no loss' figure with the actual housing stock at the beginning of the next year (LPS NI Housing Stock publication). If the actual housing stock is less than the estimated 'housing stock if no loss', this would suggest that some stock has been lost during the year.
- Subtract actual housing stock at the beginning of the next year from estimated 'housing stock if no loss' to get an estimate for net stock loss during the year.

Due to the nature of the data and considering these figures are estimates, there can be wide variation from year to year. Therefore, averages have been taken over nine years to smooth the variations in the data and look at longer term trends.

5.1.4. Total stock

Data source: LPS Northern Ireland Housing Stock publication

Changes to data

The LPS NI Housing Stock publication remains the source of housing stock statistics with the most recent statistics available up to 2019. This HGI update has used the relevant data available at the time of update.

6. Local Government District (LGD) level figures – 2016 based Housing Growth Indicators

6.1. Background to LGD level estimates

Each time the HGIs have been calculated, estimates at LGD level have been produced. These are produced by using existing data or estimating LGD level data for each of the key components of the HGIs detailed in Table 2: number of households, second homes, vacant stock, net conversions/closures/demolitions (net stock loss) and total housing stock for start year. The individual components are then combined to produce the HGIs at LGD level.

6.2. Data sources for each of the 5 key components are the same as those listed for the NI HGI figure (see 'User Information – data sources' on page 9) and more detail on the LGD calculations can be found in Appendix 1, page 15.

Table 3: Estimate of total housing need in Northern Ireland by Council 2016-2030¹

Council / Region	2030 estimated dwelling requirement
Antrim and Newtownabbey	4,200
Ards and North Down	5,500
Armagh City, Banbridge and Craigavon	17,200
Belfast	7,400
Causeway Coast and Glens	5,600
Derry City and Strabane	4,100
Fermanagh and Omagh	4,300
Lisburn and Castlereagh	10,700
Mid and East Antrim	5,400
Mid Ulster	10,300
Newry, Mourne and Down	10,000

¹ Estimates are rounded to the nearest hundred.

6.3. These figures have been used as a starting point for allocating housing land as part of the Local Development Plan process. The figures presented here at LGD level are solely based on the data, are 'policy neutral' and use similar methodology to that used to produce the NI HGI estimate.

6.3.1. Issues when producing LGD level data

There are fewer data sources available to calculate the HGIs at LGD level. Some data that are robust for Northern Ireland are not robust when broken down to LGD level. In addition, some data that were used in the past may no longer be available or not available at suitable quality levels (see 'User Information – data sources' on page 9).

Appendix 1

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

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

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

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

Household projection 2030

Data source: 2016 based household projections

To produce LGD level data: Household projections data have been calculated for the new 11 LGDs.

Changes to data

The latest household projections (2016 based) replaced the 2012 based household projections. The 2016 based figures are lower than the 2012 based figures (see 'Number of households' section on page 11 for some of the reasons why the figures are lower).

Second homes 2030

Data source: Central Survey Unit combined survey sample 2016-17

To produce LGD level data: As with the NI HGI calculation, the term 'second home' relates to a dwelling, not permanently occupied, whose owner resides principally in another dwelling. This includes holiday homes and residences used for easy access to business, but excludes dwellings privately rented to other tenants. Following review of the previous sources for this update only one robust data source for second homes data was identified: the NISRA CSU combined survey sample 2016-17. The overall NI second homes figure was apportioned across each of the 11 Councils to reflect the distribution present in the NISRA CSU combined survey sample data.

Changes to data source

No change

Vacant stock 2030

Data source: Central Survey Unit combined survey sample 2016-17

To produce LGD level data:

As with the NI HGI calculation, to maintain consistency with the data used for second homes, the NISRA CSU data was also used as the source for this variable. Again, similar to the second homes calculations, the overall NI vacant stock figure was apportioned across each of the 11 Councils to reflect the distribution present in the NISRA CSU combined survey sample data.

Changes to data source

For the 2012 based HGIs, NIHCS data was used. However, as detailed previously, for this 2016-based HGI update it was decided to maintain consistency across data used to ensure a more robust estimate using figures obtained from one source where possible and so, given only one suitable source was available for estimating second homes, that same source was used for vacant stock estimation. Therefore the source for vacant stock estimation has changed from NIHCS to NISRA CSU Combined Survey Sample.

Net conversions/closures/demolitions 2016 to 2030

Data source: Estimates produced using published LPS data on new dwelling completions and housing stock.

To produce LGD level data: Approximations were produced for each LGD as per the estimation of the NI level figure (see 'Calculation of estimates' section on page 12). These LGD level data have been used to apportion the NI level net conversions/closures/demolitions figure of 11,100.

Change to data source

No change

Issues to note

Using average over 9 years

As per the NI level figure, due to the nature of the data there can be wide variation from year to year. Therefore averages have been taken over a number of years to smooth the variations in the data and look at longer term trends.

Previously a 4 year average was used to calculate LGD level estimates. For this refresh, to produce a more robust estimate, the full data available covering the period 2010-11 to 2018-19 was used.

New stock estimate 2030

The new stock estimate for 2030 is calculated by adding the estimated number of second homes, vacant stock and stock loss adjustment to the estimated number of households for each Local Government District area.

Total stock 2016

Data source: LPS NI Housing Stock publication

To produce LGD level data: Data are available for the new 11 LGDs from this publication

Projected new dwelling requirement by LGD for 2016 to 2030

This is calculated by subtracting total stock estimate for 2016 from total stock estimate for 2030 for each LGD.

Appendix 2

Table A2: Comparison of LGD level Housing Growth Indicators 2016-2030 with recent new dwelling completion rates

Local Government District	Projected new dwelling requirement 2016-2030 ¹	Comparison 15 year figure using recent completion rates ²		
Antrim and Newtownabbey	4,200 dwellings	8,160 (544 x 15)		
Ards and North Down	5,500 dwellings	10,275 (685 x 15)		
Armagh, Banbridge and Craigavon	17,200 dwellings	13,755 (917 x 15)		
Belfast	7,400 dwellings	10,065 (671 x 15)		
Causeway Coast and Glens	5,600 dwellings	8,565 (571 x 15)		
Derry City and Strabane	4,100 dwellings	7,680 (512 x 15)		
Fermanagh and Omagh	4,300 dwellings	4,935 (329 x 15)		
Lisburn and Castlereagh	10,700 dwellings	11,580 (772 x 15)		
Mid and East Antrim	5,400 dwellings	6,405 (427 x 15)		
Mid Ulster	10,300 dwellings	10,680 (712 x 15)		
Newry, Mourne and Down	10,000 dwellings	9,690 (646 x 15)		

¹ Estimate of housing need by Local Government District 2016-2030 (see Table 1 and Table 3 on pages 6 and 13 respectively) - derived by estimating each of the key components at LGD level and combining to form the HGI for each LGD.

² An approximate figure of new dwelling completions per annum (given in brackets) has been worked out using LPS new dwelling completions data over the time period 2015-16 to 2018-19 (the full time series available at 11 LGD level). 2016 to 2030 is a 15 year period so the calculated average figure has been multiplied by 15 to give a figure that can be compared with the projected new dwelling requirement 2016-2030.

Appendix 3

Useful links

2012 based Housing Growth Indicators and methodology paper are available on the Dfl website at:

https://www.infrastructure-ni.gov.uk/publications/2012-based-housing-growth-indicators-hgis-and-methodology-paper

Details of the household projections data and methodology are available on the NISRA website at:

https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/HP16-bulletin.pdf

RDS 2035 available on the Dfl website at:

https://www.infrastructure-ni.gov.uk/publications/regional-development-strategy-2035

Details on the NI Housing Executive Northern Ireland House Condition Survey (including results from the survey) are available on the NIHE website:

https://www.nihe.gov.uk/Working-With-Us/Research/House-Condition-Survey

Land and Property Services NI Building Control Starts and Completions publication is available on the DoF website:

https://www.finance-ni.gov.uk/publications/new-dwelling-statistics-report

Land and Property Services NI Housing Stock publication is available on the DoF website: https://www.finance-ni.gov.uk/publications/annual-housing-stock-statistics

Appendix 4: Technical Review of the Evidence
Base Underpinning the Housing
Strategy (Turley Economics)

Technical Review of the Evidence Underpinning the Housing Growth Strategy

Mid and East Antrim Local Development Plan: Draft Plan Strategy

December 2019

Introduction and Scope

- 1. Mid and East Antrim Borough Council ('the Council') is in the process of preparing its Local Development Plan (LDP), and is consulting on the draft Plan Strategy¹ (DPS) until 11 December 2019. This paper has been prepared by Turley to provide a technical review of the level of housing growth proposed therein, and the underlying evidence base.
- 2. It is produced in the context of practice guidance produced by the Department for Infrastructure which emphasises that the 'strategy, policies and allocations' of an LDP must be 'founded on a robust evidence base' if it is to ultimately be found sound².

Housing Growth Strategy and Supporting Evidence

- 3. The DPS explicitly strives to 'deliver sufficient housing' and further acknowledges that:
 - "Planning for future housing growth across the Borough is one of the core functions of the Local Development Plan as the provision of housing is key to population growth which in turn provides the critical mass to support the provision of infrastructure and services..."⁴
- 4. It equally recognises the broader role of the planning system in securing 'the economic prosperity of individuals and communities', with a firm desire for the LDP to 'assist in promoting sustainable economic growth'⁵. It is seen to have 'a key role to play in achieving a vibrant economy and facilitating employment', not simply through 'the zoning of land' but also in 'the development of planning policy to support business development and job growth'⁶. Housing is recognised as 'essential' in support of the delivery of sustainable economic development⁷.
- 5. Whilst the Council has correctly identified the importance of providing housing through the planmaking process, there is little evidence as to how it has robustly given consideration to the housing growth that could be needed to support the economy of Mid and East Antrim, nor to the



¹ Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Draft Plan Strategy

² Department for Infrastructure (May 2017) Development Plan Practice Note 6 – Soundness, version 2 (CE2)

³ Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Draft Plan Strategy, paragraph 4.1.3

⁴ *Ibid,* paragraph 5.3.1

⁵ *Ibid*, paragraph 4.15 and p44

⁶ *Ibid*, paragraph 5.4.3

⁷ *Ibid*, paragraph 7.1.1

- wider range of factors that will influence the scale of housing need in the borough. Such considerations are absent from both the DPS and the technical supplement on housing⁸.
- 6. Indeed, in the supporting justification for its policy on housing provision the Council has limited itself by only referencing the Housing Growth Indicator (HGI) produced by the Department for Infrastructure in 2016. It has taken an apparently unsubstantiated view that this figure is 'based on the best available evidence' such that there is 'no sound reason for departing from it'9.
- 7. The reliance on the HGI to justify its policy on housing provision sits in contrast to the simultaneous and correct acknowledgement 10 that the HGIs are produced only 'as a guide for the preparation' of LDPs, making the core assumption that 'current population/household formation trends... will continue in the future'. As such, the Council appears to have accepted that the HGIs are 'quidance, rather than a cap on housing development in the area or a target to be achieved'.
- 8. Despite this concession, its uncritical retention of the HGI leads the Council to suggest that only 7,477 dwellings need to be provided in Mid and East Antrim over the period from 2012 to 2030, equivalent to 415 dwellings per annum on average. Completions to 2018, which 'have already exceeded allocation' 11, are deducted from this figure to produce a residual requirement for 4,614 homes between 2018 and 2030. This forms the basis for the housing allocation under Policy SGS3 and equates to only 385 dwellings per annum on average.
- 9. In adopting this approach, the Council has failed to recognise the value and importance of diagnosing or addressing the limitations of the HGIs, which provide only a 'starting point' and are not intended to replace an assessment of 'the full range of factors that may influence housing requirements over the plan period in terms of how many houses are needed in any area' 12.
- 10. The following critical review of the drivers of local housing need confirm that the Council's generalised claim that its HGI figure reflects 'the best available evidence' does not stand up to scrutiny. It is strongly recommended that the Council revisits its evidence base to ensure that it has robustly examined and understood the implications of all of the drivers of future housing need and the consequences associated with limiting its planned housing provision to align with the HGIs.

Influence of Trend-based Projections

- 11. The HGI is highly sensitive to its underlying assumptions on how the population will change in future, as it is essentially derived from a trend-based projection of future population and household growth. The figure referenced in the DPS is ultimately based on the premise that the population of Mid and East Antrim will grow to the extent implied by the 2012-based population projections released in October 2014 by the Northern Ireland Statistics and Research Agency (NISRA).
- 12. At the outset, it is important to recognise that:



⁸ Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Technical Supplement 3: Housing

 $^{^{9}}$ Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Draft Plan Strategy, pa ragraph 5.3 5

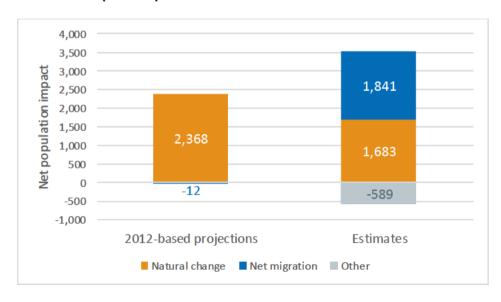
¹⁰ *Ibid*, Appendix A

¹¹ *Ibid*, p62

"These projections are not forecasts and do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour" 13

- 13. It has been similarly and consistently recognised at UK level that any such projections 'will inevitably differ to a greater or lesser extent from actual future population change', because 'assumptions about the future cannot be certain' due to the 'many factors' influencing 'patterns of births, deaths and migration' 14.
- 14. As such, it is considered important to test the reliability and suitability of assumptions that were made over five years ago in developing the population projections that underpin the HGI figure now favoured by the Council. This is enabled through the continuous estimation of annual population change by NISRA, up to and including 2018¹⁵.
- Such an exercise notably reveals that the population of Mid and East Antrim has grown some 25% faster than was envisaged by the 2012-based projections, over its initial six years (2012-18). This is largely attributable to migration, because the 2012-based projections assumed that inflows to the borough and outflows in the opposite direction would be largely balanced with a small net outflow of 12 people but there has actually been a net *inflow* of some 1,840 people over the six years, largely from outside the UK. As illustrated in the following chart, this deviation offsets the impact of lower than anticipated natural change (births minus deaths) and "other" changes¹⁶.

Figure 1: Components of Actual and Projected Population Change in Mid and East Antrim (2012-18)



Source: NISRA; Turley analysis

¹⁶ This by definition excludes births, deaths and migration, with NISRA explaining that this captures 'changes in armed forces personnel stationed in Northern Ireland' for example



 $^{^{13}}$ NISRA (October 2014) Statistical bulletin: population projections for areas within Northern Ireland (2012 -based) p3

Office for National Statistics (2019) National Population Projections: 2018-based statistical bulletin; Office for National Statistics (2019) National Population Projections: 2016-based statistical bulletin

¹⁵ NISRA (2019) Mid Year Population Estimates

16. The recent level of net migration is not without precedent in Mid and East Antrim. Indeed, as shown in the chart below, the inflows recorded in recent years are actually more consistent with the long-term trend. The borough has evidently attracted and retained more people than it has lost in all but three years since 2001, with a departure from this trend of net in-migration only during a period influenced by recession (2009-13). The assumption, made within the 2012-based projections, that there will be essentially zero net migration into the borough over the period covered by the HGI would appear to have been unduly influenced by the recessionary period which preceded its base date, as would be expected given their trend-based nature ¹⁷. The extent to which a forward projection based on this period alone is representative should warrant further consideration and comparison with trends recorded over a longer period including a number of economic and demographic cycles.

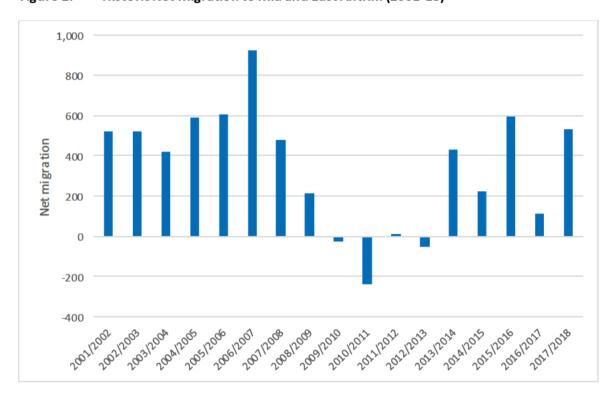


Figure 2: Historic Net Migration to Mid and East Antrim (2001-18)

Source: NISRA

17. As has already been outlined above and illustrated in Figure 1, the assumed balance between inflows and outflows of migrants within the projections underpinning the HGI figure favoured by the Council is clearly not materialising in Mid and East Antrim. Instead, there is clear evidence, drawing on subsequent estimates of population change, of a return to a more positive long-term trend of net in-migration. Given that housing is generally needed to accommodate population growth, it is no coincidence that the borough has returned to being more effective at attracting

¹⁷ The 2012-based projections draw their migration trends from the five preceding years (2007-12). They assume that on average there will be a net outflow of 15 people from Mid and East Antrim each year during the period for which the HGIs were originally calculated (2012-25)



and retaining people as the rate of housing development has increased in recent years, as shown in the following chart¹⁸.

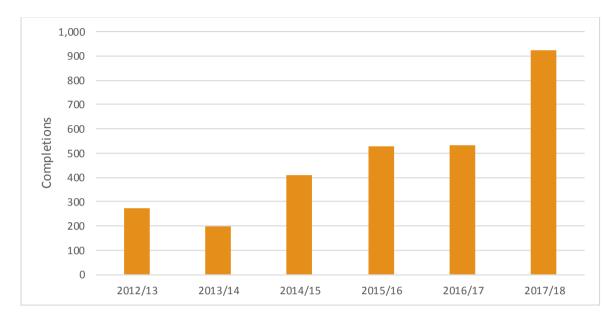


Figure 3: Housing Completions in Mid and East Antrim (2012-18)

Source: Mid and East Antrim Borough Council

- 18. Given the relationship between housing and population growth, recent delivery rates also provide a further means through which the realism of the assumptions implicit in the HGI can be tested at a high level. Since 2012 the earliest year for which Council data is available the borough has proven that demand locally exists to support the average provision of circa 477 homes annually, rising to exceed 900 homes in the latest reporting year. The HGI of 415 dwellings per annum appears modest and arguably regressive in this context.
- 19. The DPS does recognise that the rate of development has exceeded the HGI, but simplistically considers this to be indicative of "overprovision" rather than a signal that need itself has been potentially underestimated, not least due to the symbiotic relationship between housing and population growth. This stance illogically leads the Council to reduce its future housing allocation still further to provide only 385 dwellings per annum over the remainder of the plan period (2018-30). This is some 20% lower than the 477 homes completed annually on average in recent years, and would reverse the recovery that has been achieved over the past four years.
- 20. It is conceded that the residual housing requirement almost precisely aligns with the revised HGI of 386 dwellings per annum released for the borough around the time at which the Council launched its DPS consultation¹⁹. This should not be automatically viewed as an endorsement of the Council's strategy, however, as it would remain a regressive step in the context of recent delivery and continues to be highly influenced by assumptions made in the underlying 2016-based projections which envisage that:

Turley

5

Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Technical Supplement 3: Housing,

 $^{^{19}}$ NISRA and Department for Infrastructure (September 2019) Housing Growth Indicators, 2016 -based

- The population of Mid and East Antrim grows by an average of 0.22% annually over the period for which the HGI is calculated (2016-30). The population of the borough has historically grown at a faster rate in all but two of the past 17 years, averaging 0.50% per annum in this time;
- The borough receives an average net inflow of 181 people annually over the period to 2030, which remains comparatively modest in the context of the long-term trend shown at Figure 2. Since 2001, Mid and East Antrim has recorded an average inflow of circa 344 people each year, and the Council would be implicitly relying on a 47% fall in this long-term average if it considered the new HGI to be representative of future needs; and
- Mid and East Antrim will have received a net inflow of 225 people in the first two years of its projection period (2016-18), for which population estimates have already been produced by NISRA. While it is recognised that there is scope for short-term fluctuation, it remains notable that a net inflow of some 645 people has actually been recorded in that time. This is almost three times the inflow envisaged by the latest HGI to date.
- 21. The above emphasises the importance of properly interrogating both the previous and updated HGIs, viewing them correctly as a 'starting point' rather than 'a target to be achieved'. The Council's failure to yet prepare and publish an evidence base which recognises and tests the robustness of the informing datasets risks underestimating future growth in the population of Mid and East Antrim and providing fewer homes than are needed through the LDP as a result. Furthermore, as considered in the next section, beyond its direct impact on the operation of the housing market and the housing choices available to the resident population this also has potentially more far-reaching consequences with regards the integration of planning policies and ability of the Council to achieve wider economic strategy objectives.

Relationship with the Economy

- 22. As noted earlier in this paper, the projections that sit beneath the HGIs openly make no attempt to predict how changing economic circumstances will influence demographic behaviour²⁰. As such, they do not account for any need to attract additional people to provide a suitably sized labour force for local businesses, or retain potentially skilled residents that would otherwise be inclined to move elsewhere to pursue economic opportunities.
- 23. The projections instead simply assume that past trends, including those recorded during the recession, will continue. As a result, in the case of Mid and East Antrim, the HGI favoured by the Council only illustrates the scale of housing need that would be generated where the working age population is assumed to diminish without being replaced. This is illustrated in the following chart, which additionally confirms that a similar assumption is embedded in the latest iteration of the HGIs for the borough. In reviewing the information shown in the chart, the stark switch from a historic growth in the working age population in Mid and East Antrim to a projected decline is significant. Recognising and responding to such a significant change in the potential underlying profile of the area's population, where provision is aligned with the HGIs, should form a critical consideration for the emerging policies for housing as well as other aspects of the LDP related to supporting the future resilience of the economy.

 $^{^{20}}$ NISRA (October 2014) Statistical bulletin: population projections for areas within Northern Ireland (2012-based) p3



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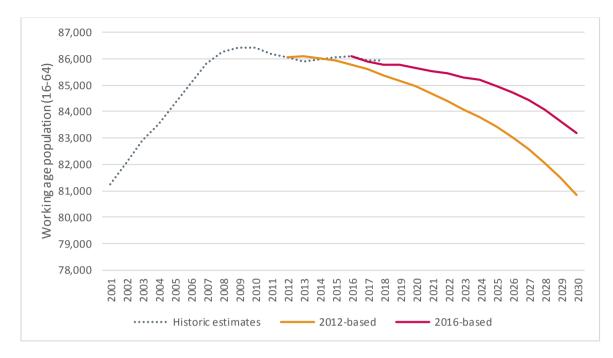


Figure 4: Historic and Projected Working Age Population in Mid and East Antrim

Source: NISRA

- 24. The implied substantive reduction in the size of the available labour-force in Mid and East Antrim, where the HGIs are used as the singular basis for future housing provision, would appear likely to undermine the economic objectives of the Council. These stated objectives are aimed directly at responding positively to recent job losses by ostensibly taking a proactive approach through the LDP that seeks to 'instigate economic recovery' and diversify the economy²¹. Economic growth and diversification is explicitly described as 'the top priority' of the Corporate Plan, and there is acknowledgement that the borough needs to improve its competitiveness if long-term economic growth is to be achieved so as to 'create more employment and higher paid jobs thereby enhancing the health and living standards of everyone'22. The extent to which a shrinking working age population would even sustain, let alone improve, economic competitiveness is debatable. The failure to either acknowledge or respond to an issue of this magnitude is a considerable shortcoming of the published evidence base.
- 25. In this context, it is also important to recognise that the Council's implicit acceptance of this outcome, through the uncritical use of the HGIs, contrasts with a notably more positive approach taken towards land zoned for employment use. The DPS proposes to retain some 156ha of previously zoned land, and actually boosts this by a further 7% to address a perceived gap in provision²³.
- 26. There is a clear risk that investment in the development of this land, and subsequent creation of jobs, could be actively curtailed by a shrinking labour force. The Council could take a more

²³ Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Technical Supplement 5: Economic Development, paragraph 4.5; Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Draft Plan Strategy, Policy SGS6



²¹ Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Draft Plan Strategy, paragraph 4.1.5

²² *Ibid*, paragraph 5.42 and p121

positive approach in this regard that seeks to replenish its working age population, and aims to attract and retain skilled people to secure economic recovery and growth. This important relationship between housing and the economy is not considered to have been adequately explored by the Council, and could well have provided a 'sound reason' for departing from the HGI had the issue been properly assessed.

Summary

- 27. This paper demonstrates that the Council has to date failed to provide sufficient justification or evidence in support of the planned level of housing provision proposed in the DPS, which is directly derived from HGIs intended for use only as a 'starting point' and would lead to the provision of 415 dwellings per annum on average between 2012 and 2030.
- 28. The Council has claimed that there is 'no sound reason' for departing from the HGI, but does not appear to have adequately considered the need for such a departure nor interrogated the factors that influence the calculation of this figure. The Council's belief that the now superseded HGI is based on the 'best available evidence' for Mid and East Antrim belies the fact that its underlying demographic assumptions have been locally proven incorrect in recent years; the population has to date grown by 25% more than it anticipated, and the borough has actually attracted an inflow of people rather than the small outflow that was predicted based on a misrepresentative recessionary trend.
- 29. There are similar limitations to the revised HGIs, released as the Council launched its current consultation on the DPS. They ultimately assume that future population growth in Mid and East Antrim will markedly slow to a rate that is largely without recent precedent. While some allowance for the housing needs of those attracted to and retained within the borough is made, the scale of the assumed net inflow of people is almost half that recorded historically and has been exceeded in all but one year outside of the recession.
- 30. Both the revised and previous HGI figures for Mid and East Antrim would reverse the recent recovery in housing development, the latter still more so following adjustments made by the Council to account for perceived "overprovision" in the early years of the plan period and reduce future provision to only 385 dwellings per annum. The proven demand for housing beyond the level suggested by the HGIs could actually have been seen to result from their basic underestimation of need, as appears likely from the analysis in this paper.
- 31. The HGIs also make no attempt to predict the influence of economic factors, simply assuming that the working age population of Mid and East Antrim will diminish based on a continuation of past trends without intervention. The Council has not considered the extent to which such an outcome could undermine its economic objectives, despite a firm desire to instigate economic recovery and a recognition that housing is essential in supporting the delivery of sustainable economic development. Proper consideration of this issue could well have provided a 'sound reason' to depart from the HGI, but it has not been adequately explored to ensure that policies on housing and employment provision are sufficiently integrated.
- 32. The Council is advised to consider the above factors in evaluating the extent to which its proposed strategy can be judged as sound, mindful of the need for 'a robust evidence base'. Current deficiencies mean that a comprehensive review is considered to be necessary, and is likely to require an increase in planned housing growth to meet needs in full.



December 2019

IPRP0001



Appendix 5: Settlement Evaluation – Ballymena

Settlement Evaluation

December 2019

Ballymena

Ballymena Town			
Settlement Category	Population (2011 Census)	Area (ha)	No. of dwellings (2011 Census)
Main Town	29,551		

Overview of Settlement

Ballymena is broadly defined by the M2 to the north, the A26 to the west, Braid River in the south and the east. Ballymena is identified as being a Main Hub in the Regional Development Strategy (RDS) 2035 with the potential to cluster with Antrim and Larne. The RDS 2025 recognised Ballymena, Omagh and Newry as Main Hubs that have a well-established sub-regional role and more extensive sphere of influence reflecting their larger size and the availability of a wide range of higher order urban functions. Such centres were 'expected to generate higher levels of future growth reflecting their established role and strength as local engines of economic activity in their respective sub-regions' (RDS 2025 p48). It has a significant retail centre which is complimented by nearby tourism attractions, including the Causeway Coast and Glens. Further services and facilities include a wide range of health, education, commercial leisure, sport and recreation provision.

RDS Settlement Evaluation Framework

Resource Test

All households have access to a clean water supply as well as having waste/sewage disposal connection to the mains sewer flowing to Ballymena WWTW. NI Water's sewerage network capacity mapping tool has identified wastewater network capacity issues in parts of Ballymena, Carrickfergus, Greenisland, Ballycarry, Portglenone, Carnlough & Glenarm. Superfast broadband and 4G mobile data coverage is available throughout the settlement. Ballymena and Broughshane fall within the '10 towns' licence area where gas distribution networks are being developed by Firmus energy. The settlement contains further education facilities, primary and secondary schools, hospital services, pharmacies, health centres, day care centres, a leisure complex, supermarkets, a mix of retail centres, a range of restaurants, police/fire/ambulance station, recycling centre and industrial/business centres. In relation to the RDS Settlement Hierarchy and Related Infrastructure Wheel, Ballymena possesses a significant amount of the resources and facilities which are found at Level 3 (Regional Towns).

Environmental Capacity Test

The Braid River and River Maine provide a floodplain landscape setting to the east and south-west of Ballymena. The wooded Galgorm Castle Registered Historic Park, Garden and Demesne and associated golf course is an important local landscape feature associated with the River Maine corridor. The River Maine corridor south of Gracehill is an attractive open landscape which provides a pleasant setting for Gracehill Conservation Area and Galgorm Castle and golf club. The M2 and A26 link define the eastern and south-eastern edge of this settlement creating a hard edge in these areas; however, the ECOS park on the Braid River corridor provides an area of open space which helps soften the landscape. There are no LLPA's designated in the



extant Ballymena Area Plan as these types of designations were introduced after the plan was adopted. The Ballymena Flood Map shows potential for some minor river and surface water flooding throughout the town centre. The majority of river flooding (Q100) is located around the Braid, and in the north west segment of Ballymena. Surface water flooding (I200) is seen at isolated locations throughout the centre. The Ballymena constraints map prepared by the Council identifies defence and industrial heritage assets, sites and monuments, and listed buildings. These assets are located throughout the centre, constraining development in some parts of Ballymena. A Tree Preservation Order exists along the stretch of the Ballymoney Road which falls within the town centre boundary. Public Realm works have recently been completed on Church Street, Wellington Street, Ballymoney Street and Broughshane Street, including widening and re-surfacing of footpaths, soft landscaping, reduction of onstreet parking, and installation of street furniture. Most central parts of the town centre were found to be a good standard.

Transport Test

Transportation in Ballymena is primarily provided by the road network. The A26 is identified in the RDS as a Link Corridor which connects Ballymena to Coleraine and the north and with Antrim to the south. It links on to the M2 Ballymena By-Pass connecting to Belfast. The A36 (Moorfields Road/Shanes Hill Road) links Ballymena to Larne. There are four main bus routes into the Town Centre, with 36 services operating each weekday, and 23 services on Saturdays. These bus routes do not operate on Sundays. There are also Ulsterbus Services servicing 14 destinations, and Goldline services to Belfast daily. Park and Ride Facilities are located at the Bus/Train Station off Princes Street and also Ballee Park and Ride on Antrim Road off A26/Ballee Roundabout. Ballymena Rail Station operates services to both Belfast and Derry/Londonderry and connections to a number of other key locations within NI. These services call at Ballymena Rail Station on an hourly basis, with half hourly services at peak hours. A regular hourly service also operates at weekends. The Rail Station is located alongside the Bus Station, so providing the ability to interchange modes and potentially minimise the need for car travel. The Town Centre is well catered for in terms of parking, with the January 2018 Parking Study Baseline Report completed by Systra, identifying 3,320 car parking spaces, 1,986 of which are in Council run car parks, and 1,244 within private car parks. There are 5.5 km of cycle network infrastructure in Ballymena.

Economic Development Test

Ballymena is the largest centre in MEA Borough, and had 603 retail units within the town centre at the time of the MEA Borough Council retail surveys. Ballymena has the most comprehensive and diverse offer of retail and services of the three main towns in the Borough and as a result, is the most popular of three. The centre has two main shopping centres within the town centre boundary; the Fairhill Centre and the Tower Centre. The Fairhill Centre in particular is very popular, although it is located towards the edge of the town centre boundary. The Braidwater Retail Park is also located on the edge of the town centre boundary, partially in, and partially out. Ballymena Town Centre includes an extensive list of national multiples and major retailers, testimony to Ballymena being the largest centre within the Borough. 76 national multiples and major retailers were identified at the time of Mid & East Antrim Borough Council centre survey, including H&M, Superdrug, EE, New Look, Next, Primark, River Island and Topshop.



Ballymena has a higher than average proportion of retail services and a lower than average proportion of leisure services. The proportion of financial and business services meanwhile is marginally higher than both the NI and UK averages. In terms of retail services, Ballymena has a proportion of 18.1% retail services units. This is higher than the NI average of 12.8% and the UK average of 14.5%. This is a trend present in all three MEA town centres. Regarding leisure services, Ballymena has a lower proportion of leisure services in the town centre (14.6%) compared with the NI average of 19.3% and the UK average of 24.0%. Again, this is a trend across all three town centres within MEA indicating that we are yet to see the influx of restaurants and cafes and other non-retail town centre uses into the MEA town centres.

Ballymena has a high proportion of vacant units within the town centre, with 20.7% of units vacant at the time of the MEA Borough Council retail survey. This is above the NI average of 18.1% and the UK average of 11.2%. Notwithstanding, Ballymena had the lowest vacancy rate of the three main town centres in MEA and has seen a slight reduction in vacancies since 2012 when the Experian survey found 22.7% vacant units.

Employment in food manufacturing is part of the total 9,173 manufacturing jobs in the Borough and includes Moy Park, based in Ballymena, which is one of the area's key employers. There are recognised opportunities for sector growth. With a growing global focus on food quality, safety and provenance, Mid and East Antrim is well placed to develop as a leading centre of excellence. The Agri-food Strategy Board predicts an annual jobs growth of 3-4% in NI and major increases in GVA.

The new innovation facility developed at the Ecos Centre in Ballymena will be important in creating potential for more technology jobs. There are opportunities for sector growth in software engineering, data analytics, networks and sensors and cyber security. New business accommodation of around 20,000 sq ft is now available at The Innovation Centre at Ecos, Ballymena. The facility provides 'science park-styled' shared and private workspaces with meeting space and business support. Ballymena Business Centre has over 100 units around 100,000 sq ft of workspace and office space across five sites around Ballymena and is 95% occupied.

The Ballymena Area Plan contains a section relating to 'Employment & Industry'. The plan highlighted Ballymena town as the main focus of industrial employment and referred to a considerable amount of zoned land remaining undeveloped as well as a decline in manufacturing resulting in several mills becoming vacant, with favourable consideration being given to their re-use for manufacturing, commercial and other uses. Large-scale industry was encouraged to locate to sites designated in the urban area as below:

- Woodside Rd 63 Ha
- Galgorm 8 Ha

Ballymena only has undeveloped zoned land remaining in the north-eastern sector of the town, will require further land to be zoned in order to fulfil the SPPS requirement to offer a range and choice of sites.

Urban and Rural Character As noted above, the Braid and Maine Rivers contribute to the landscape setting to the east and south-west of Ballymena. The wooded Galgorm Castle Registered Historic Park, Garden and Demesne and associated golf course is an important local landscape feature associated with the River Maine corridor. The River Maine corridor south of



Gracehill is an attractive open landscape which provides a pleasant setting for Gracehill Conservation Area and Galgorm Castle and golf club. The Galgorm Road area is also designated as an Area of Townscape Character. The M2 and A26 link define the eastern and south-eastern edge of this settlement creating a hard edge in these areas; however, the ECOS park on the Braid River corridor provides an area of open space which helps soften the landscape. The principal opportunities for lateral expansion, by way of rounding off, are to the north and west where there is least physical constraint presented by the road network and areas of high landscape quality which combine to define the town's setting. Community Ballymena is well supplied with resources and facilities, performing a key community service role for its inhabitants, surrounding towns, villages and the rural area. Ballymena has the most comprehensive and diverse offer of retail and services of the three main towns in the Borough. The centre has two main shopping centres within the town centre boundary; the Fairhill Centre and the Tower Centre. The Braidwater Retail Park is located on the edge of the town centre boundary. Ballymena Town Centre includes an extensive list of national multiples and major retailers. Ballymena is served by 16 preschools, 16 primary schools, 6 secondary schools and 2 special and independent schools. Planning approval was received in August 2019 for the Northern Regional College consisting of construction of a new Further Education Campus to consolidate the three existing campuses. The town also has numerous care homes and folds, a leisure complex, library, hospital, 11 GP surgeries, 13 dental surgeries, churches encompassing all of the main religious denominations, church halls and community centres. Various sporting clubs are located in the town, including Ballymena Hockey Club, Ballymena Bowling Club, Ballymena Rugby Club and Ballymena Raceway. A new leisure centre has been granted outline planning approval in March 2019 as part of the redevelopment of the St Patricks Barracks site in Ballymena. **Qualitative Analysis** Strengths Established sub-regional role and extensive sphere of influence reflecting its scale and the availability of a wide range of higher order urban functions. Excellent connection to the strategic transport network via major roads (M2 and A26), train line and bus services. • Located in proximity to Larne Port and Belfast International Airport - potential to cluster with Antrim and Larne. • A wide range of employment opportunities exist within the settlement. · Large, diverse and relatively strong town centre with varied retail offer and large catchment. Weaknesses • Limited coverage of cycle network. Incomplete legacy road schemes. Opportunities Potential to provide increased capacity at Park and Ride facilities. Potential to redevelop the current Bus Station and Rail Station to provide a modern multi-modal transport hub. · Potential to further enhance the strong base of employment uses, maximising the strategic location of settlement.



	 Potential to develop more leisure services, such as restaurants and bars, in the town centre to continue to strengthen the leisure services offer of Ballymena Town Centre and continue to reduce the reliance on comparison goods shopping as the main draw for visitors, as trends away from traditional comparison goods shopping are continued to be seen. Potential to develop mixed use developments in appropriate locations throughout
	the town centre, including for residential led mixed-use developments, to increase footfall within the town centre.
Constraints	Potential for river flooding along the watercourse in the settlement.
	Landscape setting in certain parts of the town.



Appendix 6: Representation in response to

Antrim, Ballymena & Larne Issues

Paper, January 2004



Land at Blairstown, Ballymena

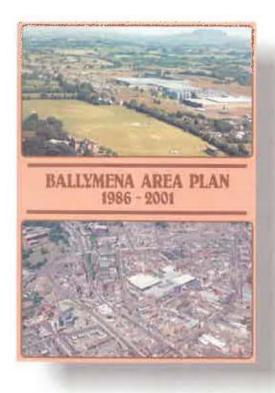
Representation to Antrim, Ballymena & Larne Area Plan January 2004

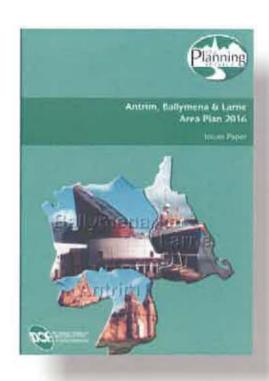
On behalf of Antrim Construction Company & Patton Group



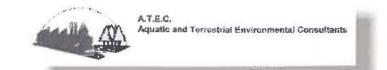
CONTENTS

	Chapter	Page
1.	Introduction	1
2.	Planning Context	2
3.	Settlement Issues - Ballymena	4
4.	Potential Expansion - Ballymena	6
5.	Settlement Issues - Galgorm	7
6.	Potential Expansion - Galgorm	8
7.	Site Context	9
8.	Visual Analysis	11
9.	Development Principles	12
10.	Summary & Recommendations	13















1. INTRODUCTION

1.1 The purpose of this representation to the Antrim Ballymena and Larne Area Plan is to build on an earlier representation in response to the Antrim Ballymena and Larne Area Plan issues Paper (August 2002) submitted on behalf of Antrim Construction Company and Patton Group.

1.2 The Antrim Ballymena and Larne Area Plan (ABLAP), currently under preparation by the Department, will replace the Ballymena Area Plan 1986-2001 as the statutory Development Plan for Ballymena Borough. It will be prepared in accordance with the regional framework established by the Regional Development Strategy (RDS) which identifies a housing growth indicator or requirement for 5,900

houses for Ballymena District between 1998 and 2015. The ABLAP will allocate land for this residential development according to the RDS search sequence where contributions from previously developed land and undeveloped land will be considered first within existing urban areas ibefore extensions to cities and towns. In this way the RDS aims to achieve more sustainable patterns of residential development and the ambitious regional target of 60% of urban housing growth for the period

up to the first review in 2010.

1.3 The aim of this representation is to Site location plan identify a strategic opportunity for a fresh release of land for residential development in a location consistent with the sustainable development principles which underpin both the RDS and the new suite of planning policy statements currently under preparation by the DOE and DRD which seeks to translate the RDS into practice.

1.4 This representation is, therefore, necessarily strategic in scope, identifying the regional planning context for the ABLAP, together with the important framework for the

allocation of growth of Ballymena town and more specifically in the Galgorm area. Other land around the edges of Ballymena both currently zoned and freshly promoted will be under consideration by the ABLAP team during plan preparation. This representation demonstrates that the representation site satisfies the important principles of planning policy and guidance more successfully than alternative sites. After establishing the strategic opportunity for growth in this location, the representation addresses the specific characteristics of the expansion site, identifies opportunities and constraints and formulates an illustrated concept plan which indicates one way in which the land might be developed.

Given the relatively early stage of the ABLAP process, this representation has been prepared without specific knowledge of the statistical base of the Development Plan. Consequently it represents only the identification of an opportunity for the Development Plan team to test. Antrim Construction Company, Patton Group and the design team are willing to engage with the Department in consultation

and discussion to confirm the initial plan views expressed in this representation.

Further representations and objections (if necessary) will be submitted in due course.





2. PLANNING CONTEXT

Regional Development Strategy (RDS)

- 2.1 The RDS was prepared under the Strategic Planning (Northern Ireland) Order 1999. A framework for the future development of Northern Ireland to 2025, it provides a spatial planning context for (inter alia) protecting and enhancing the physical, natural and manmade assets of the region and housing, transport, air and water quality, energy and waste strategies. The RDS is material to decisions on individual planning applications and planning appeals and development plans should be in general conformity with it.
- 1.2 The RDS contains a Spatial Development Strategy (SDS) and related Strategic Planning Guidelines (SPG's) which aim to provide long term policy directions, from a strategic spatial perspective, for the public and private sector and the whole community.
- 1.3 The SDS for Northern Ireland is based on a hub, corridor and gateway approach to give a strategic focus to future development and achieve balanced growth within the region.
- 1.4 The aim of the SDS 2025 is to achieve a balance of growth, which will maintain a strong economic heart in the wider Belfast 'travel to work' hinterland while encouraging decentralised development at identified growth poles across the region. This will be focused on the North West and the main towns throughout rural Northern Ireland, located on the key and linked transport corridors. The key would be to exploit local potential for the benefits of all.
- 1.5 The SDS recognises that the key to achieving an optimum balance between over concentration around the Belfast Metropolitan Area (BMA) and excessive dispersal is to sustain a reinforced network of strong urban hubs (such as Ballymena), linked by an upgraded strategic transport network. This is designed to 'provide accessible counter magnetic development opportunities to the metropolitan core, thus helping to ease development and transport pressures in and around Belfast' (RDS, p 46).
- 1.6 The main hubs identified in the RDS thus have a recognised strategic role in achieving a regional balance across Northern Ireland. Ballymena and other towns are identified as

- having the potential to develop as growth poles for the clustering of economic activity. The RDS commits to developing these main towns as the major locations providing employment, services, and a range of cultural and leisure amenities. They will also have a leading role in accommodating the need for urban housing at district level. This balance between concentration and decentralisation has to be struck in the context of a wide B MA hinterland.
- 1.7 The RDS recognises the importance of good planning in delivering the 160,000 dwellings needed in the region to 2015. Consequently, the RDS aims to promote a concerted housing drive within urban areas over the next 10 years and sets an ambitious regional target of 60% for the period up to the first review in 2010, subject to monitoring and a five year review of the target in the light of the latest housing data. This target establishes a clear change of direction towards more sustainable forms of housing development. A specific target for the Ballymena urban area will be set through the ABLAP within the context of the regional target.
- 1.8 The RDS aims to direct and manage future housing growth to achieve more sustainable patterns of residential development (SPG-HOU2). In practice this means planning on the basis of the following principles:
- concentrating major housing development in sustainable locations facilitating a high degree of integration with centres of employment, community services and public transport, including requiring a master plan approach for major urban extensions;
- encouraging mixed use developments including more housing in town centres;
- making efficient use of land by promoting more housing within existing urban areas and maintaining compact town forms;
- encouraging mixed use developments including more housing in town centres;
- adopting a sequential approach in the development plan process to the allocation of housing in towns;

- avoiding areas of significant environmental quality for extensions to towns and villages;
- placing an emphasis on creating quality places by taking account of the local development guidelines for urban and rural areas and using the guidance in Creating Places.
- 2.9 The RDS establishes a search sequence for land to meet urban housing needs.
- 2.10 In terms of the character of residential development envisaged, SPG-HOU5.1 promotes imaginative and innovative forms of housing development within urban areas and on greenfield extensions which:
- encourage medium to high density housing appropriate to its location, incorporating a mix of housing designs and sizes to meet the needs of a

range of household types, and to achieve compact settlement forms;

- densification of housing development near to public transport corridors and around centres a community facilities which include employment, shops, churches and local health facilities;
- applying the principles and standards in Creating Places.

profiles and potential of the district towns within the Family of Settlements.

2.12 The Family of Settlements report describes Ballymena as being the main retail centre for the north-east of the region, with a substantial manufacturing base and is a major service and administrative centre. It states "In the regional context,

Shaping our

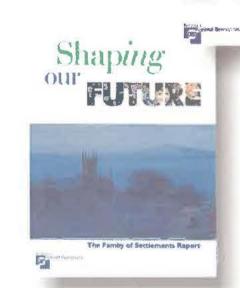
for Northern Ireland 2025

Ballymena has an exceptionally strong economy, which includes a major commercial and retail function... It has a stable manufacturing base which, coupled with a vibrant commercial centre, has enhanced the town's reputation for prosperity."

2.13 In terms of strengths and opportunities, Ballymena is said to

have many attributes "which provide a sound basis for a substantial increase in the rate of housing development, subject to environmental constraints in some sectors".

2.14 Ballymena is also described as a town which has "...continuing retail and employment potential, and could further enhance its performance as a major service centre, with good external links".



Shaping Our Future - The Family of Settlements
Report (September 2001)

1.11 The Family of Settlements report is a supplementary report to the RDS which explains how the dwellings required to meet housing need up to 2015 will be distributed across the administrative districts of Northern Ireland and sets out the

2.15 The FOS makes specific reference to the legacy of larger housing estates with some physical, economic and social problem in Ballymena.

2.16 In terms of future potential Ballymena is recognised as possessing most of the infrastructure needed to support substantial future growth and as having a well proven record as an attractive location for inward investment.

2. PLANNING CONTEXT ctd...

2.17 In summary, Ballymena has clear policy support as the principal location for residential development in the Borough. This status is derived from its critical mass, strategic accessibility, range of services and infrastructural capacity.

A Planning Strategy for Rural Northern Ireland (PSRNI)

2.18 The PSRNI sets out a number of strategic policies of relevance to the representation site. These are summarised below:

Strategic Policy SP2 Towns

2.19 States that the development plan will set out how each town will accommodate future development taking account its physical layout and character. Limits of development will be defined. For reasons of topography, amenity and environment, the limit of development may define a permanent boundary for the built up area.

Strategic Policy SP 12 Rural Landscapes

2.20 The aim of this policy is to protect rural landscapes from excessive or inappropriate development by the designation of Green Belts and Countryside Policy Areas.

Policy GB/CPA1 Designation of Green Belts and Countryside Policy
Area

- 2.21 This policy is set to establish Green Belts and Countryside Policy Areas through the development plan process. The strategic objectives of green belt policy are as follows:
- to prevent the unrestricted sprawl of large built up areas;
- to prevent neighbouring settlements merging;
- to safeguard the surrounding countryside;
- to protect the setting of settlements; and
- to assist in urban regeneration.

Planning Policy Statements

2.22 In terms of planning for the growth of Ballymena, principles established by the RDS, which emphasise the potential for imaginative, higher density greenfield development in appropriate locations are now being interpreted through a new suite of Planning Policy Statements prepared by the DOE and DRD.

Draft PPS12: Housing in Settlements (November 2002)

- 2.23 Draft PPS12 (Housing in Settlements) identifies a series of criteria which will be taken into account in the identification of land for residential development according to the RDS search sequence. These include:
- physical and environmental constraints, environmental setting, character, natural and built heritage, contamination, land stability and flood risk;
- degree of integration with employment, services, other facilities, public transport and other non-car modes:
- capacity of existing infrastructure including public transport, water, sewerage, other utilities, social and community facilities;
- ability to integrate new development without detracting from the character and identity of a settlement whilst maintaining a sense of place.
- 2.24 The above criteria and the additional factor of a site readiness for development will determine which phase of release a site will be assigned too. Appendix 2 of Draft PPS12 states that 'only sites that are realistically going to be developed in a certain time frame are assigned to the relevant phase. For example, phase 1 sites ideally already have permission'.

Draft PPS13: Transportation and Land Use (December 2002)

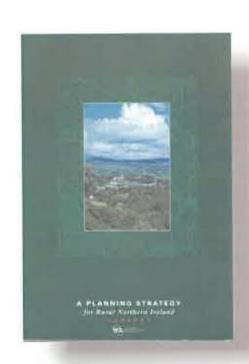
2.25 Draft PPS13 (Transportation and Land Use) aims to support and facilitate the improvement of public transport services and innovative transport alternatives to the private car. Accessibility and the location of development in order to reduce the need to travel and offer realistic alternatives to the private car are key objectives. Draft PPS13 sets out a number of locational criteria for land use allocation including;

- accessibility by alternative modes of transport;
- the critical importance of promoting higher density development on the most accessible sites;
- making the best use of public transport.
- 2.26 Draft PPS13 emphasises that sites which are readily accessible from the main traffic interchanges and well served by public transport are to be maximised.

Summary - Regional Planning Principles

- 2.27 Taken together, where greenfield releases are required the regional planning policy framework favours the allocation of land:
- where the location is sustainable, with a high degree of integration with employment, services and public transport;
- where compact forms are deliverable and areas of significant environmental quality are avoided;
- where there is capacity in existing infrastructure;
- where the location is accessible by public transport services, and where there is a viable alternative to the use of the private car.
- 2.28 The next section provides some background on the Ballymena Urban Area before explaining how these principles should be taken into account in the allocation of greenfield land for residential development around Ballymena town.





3. SETTLEMENT ISSUES - BALLYMENA

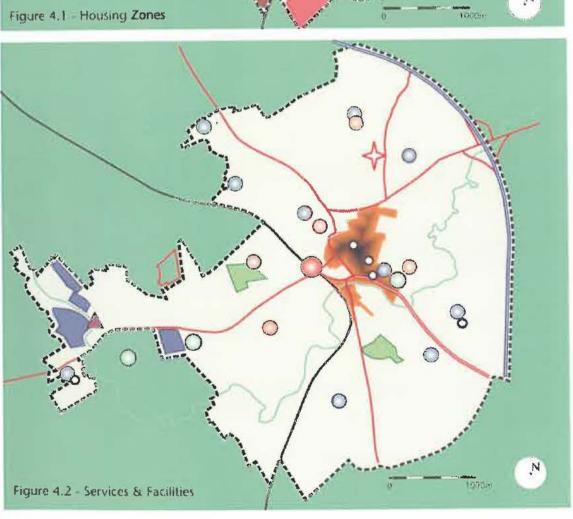
- 3.1 Ballymena is a main hub, centrally located within Northern Ireland, with a good road and rail communications network. It is served by the M2 motorway and has a rail station on the Belfast to Londonderry/Derry rail line. The town is located within close proximity to the International Airport and Seaports of Belfast and Larne.
- 3.2 Ballymena is a regional administrative centre for many organisations in the north eastern part of Northern Ireland, including the Health and Social Services, Education and Library Board and Government Departments. It is a popular retail area with a mixture of high street stores and locally owned outlets. The Borough has a strong manufacturing industry base. Farming and agricultural related industries also play a major role in the economy of the Borough.
- 3.3 Ballymena has been categorised by the RDS as falling within Rural Northern Ireland. In relation to Rural Northern Ireland the RDS set out a number of development objectives. One of the key objectives is promoting the continuing renewal and revitalisation of towns and villages.
- 3.4 The RDS also identifies Ballymena as a main hub within the spatial framework for Rural Northern Ireland. It is noted by the RDS as having a well established sub regional role and an extensive sphere of influence. Ballymena provides a strategic role as a centre of employment and services for the urban and rural communities within and around the area. As a main hub Bailymena has the potential to develop as a 'growth pole' for clustering economic activity, thereby providing a counter balance to the BMA. The RDS also states that centres such as Bailymena are expected to generate higher levels of future growth reflecting its established role and strength as a local engine of economic activity in the north sub region.(RDS Page 48)
- 3.5 The RDS allocates 82,500 dwellings of the 160,000 regional requirement to the north, south and west region (including Ballymena District). Ballymena District has been allocated a housing growth indicator of 5,900 dwellings over the period 1998 and 2015. The RDS establishes that the allocation of housing growth to specific locations within a district is a matter to be determined through the Development Plan process. In terms of the important judgement associated with the complementary urban/rural balance, the RDS recognises that due weight needs to be given to reinforcing the

leading role of the major centre of administration, employment and services. Appendix 7 of the RDS indicates that 49% of the Ballymena district population is resident within Ballymena town (13% above the regional average). The RDS recognises that successful counter magnets require critical mass and this is an important aspect of a district growth strategy.

Ballymena Area Plan 1986 - 2001 (BAP)

- 3.5 The Ballymena Area Plan (BAP), adopted in November 1989, is the current statutory Development Plan for Ballymena Borough. In line with the Regional Physical Development Strategy (RPDS, 1975-1995), the BAP established a settlement hierarchy which formed the basis of growth distribution. The strategy identified Ballymena town, the district town, as the focus for growth over the plan period (to 2001).
- 3.6 The population of Ballymena Borough has increased from 49,000 persons in 1971 to 55,800 in 1985 to 59,100 in 1998 Ballymena town, throughout this period has continued to be the principal focus of population growth. The BAP estimated that approximately 4,500 dwellings would be required in the District during the Plan period, of which up to 2,500 were planned to be built in Ballymena itself. As a result over 150ha (370 acres) was zoned for housing and it was considered that this area could accommodate over 3,000 dwellings. A surplus of land was provided to offer a degree of flexibility and choice in the provision of housing growth. The BAP did not specify recommended densities so as to eliminate any element of inflexibility which could result from the Development Control process.
- 3.7 Based on the Housing Capacity Figures for 2001 produced by Planning Service, over 1/3 of the zoned housing land under the BAP has been developed. The concentration of this development has taken place to the north and west of the town. Zoned housing land to the south has remained relatively undeveloped within the plan period.
- 3.8 Figure 4.1 illustrates zoned housing land. It differentiates between housing land already developed and not developed to date
- 3.9 Figure 4.2 Illustrates the location of existing services and facilities in Ballymena.





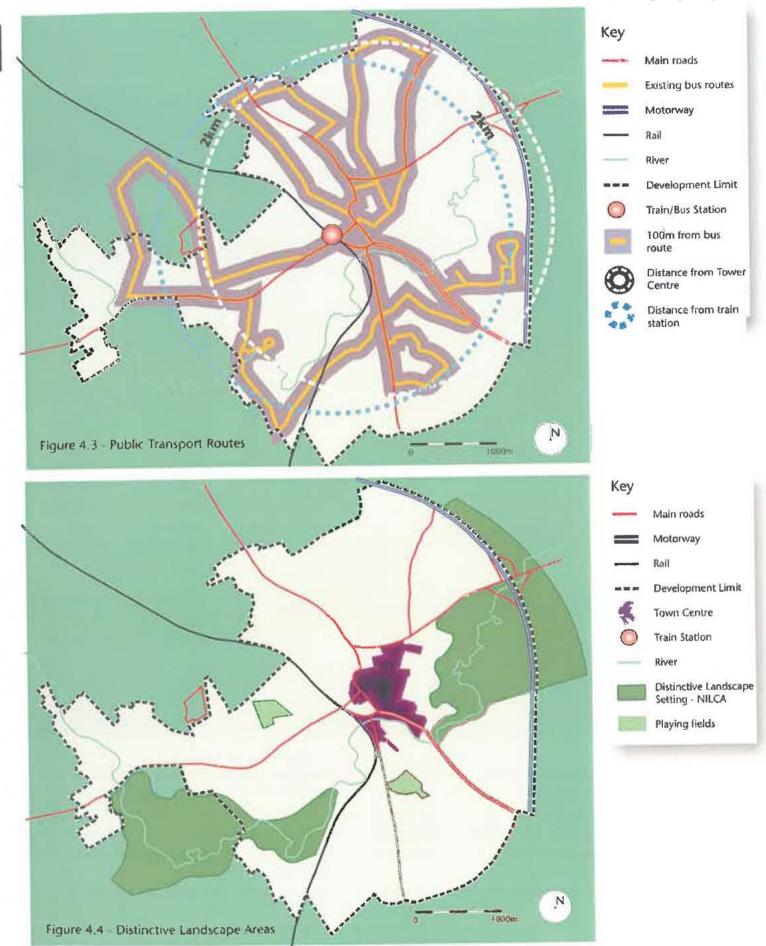




3. SETTLEMENT ISSUES - BALLYMENA ctd...

- 3.10 As stated in the BAP, surplus land was provided in order to offer a degree of flexibility and choice. Based on past trends relating to housing growth, evidence would indicate that the market choice has been to locate housing where concentrations of housing already exists, to take advantage of existing services and facilities in the urban area. In Ballymena, the trend has been to locate new housing to the north and the west of the town rather than to the south and east. This is an indication of the sequential considerations when assessing development sites, given that throughout the plan period the preference has been to develop sites for housing where services and infrastructure provision exist within close proximity to the development site.
- 3.11 Three major undeveloped BAP housing zones currently exist to the south of the town at;
- Lands along Ballee Rd West,
- Lands to Ballee School, and
- Lands along Ballee Road East.
- 3.12 All of these sites have remained undeveloped throughout the plan period (almost 20 years). A number of factors could have attributed to market forces restricting the development of this land. These factors amongst other things may include;
- landownership issues, availability of land for development;
- reluctance of people wanting to live in the area leading to a lack of demand for houses;
- lack of infrastructure provision in terms of roads, drainage and effluent disposals;
- lack of service provision in terms of local shops, schools and community facilities.
- 3.13 When considering these factors in relation to the undeveloped zoned housing lands it rises serious debate as to whether or not these sites will come forward for development over the plan period of ABLAP.
- 3.14 Figure 4.3 illustrates the location of existing public transport networks through Ballymena town. The representation site is already service by existing public transport networks. The site is located within 2km radius of the town centre and well within a 2km radius of the train and bus station.
- 3.15 Figure 4.4 illustrates areas noted as sensitive landscapes. These sensitive landscapes restrict future development of Ballymena to the east and to the south west.

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4. POTENTIAL EXPANSION - BALLYMENA

- As previously stated this representation seeks to identify a strategic opportunity for a fresh release of residential land to accommodated housing growth in Ballymena. Reflecting the Departments anticipated approach to the assessment of potential greenfield residential sites through ABLAP, six study areas have been assessed for their suitability for residential expansion. The six areas are as follows:
- Area 1 Ballyloughan
- Area 2 Galgorm Parks including Blairtsown
- Area 3 Lisfillian
- Area 4 Galgorm/Tullaghgarley
- Area 5 Ballee
- Area 6 Broughshane Lower
- The areas are illustrated on Figure 4.1

Area Description

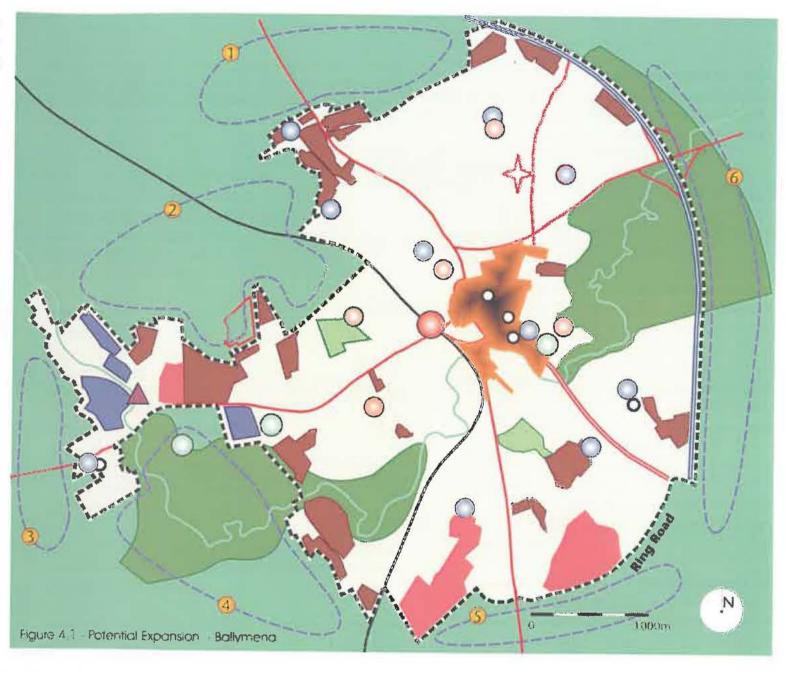
- Area 1 is located to the north of Ballymena, bounded to the north by the M22 ring road. The area is served from the town by the A36/A26. Land released for development in this area would extend beyond the existing urban form. The Northern Ireland Landscape Character Assessment (NILCA) identifies this area as the first choice for further expansion but recommends that the area would be more suitable for industrial development given its proximity to direct access from the ring road.
- Area 2 is physically and visually linked to the existing urban form. Land released for development in this area would represent a rounding off of the settlement and acheive a compact urban form. The urban footprint envelopes this area to the east and west. New development could be integrated in this area without detracting from the setting of Ballymena. This area represents a sustainable option for a greenfield release in Ballymena. The area is physically linked to existing community and commercial facilities and is serviced by exiting road and public transport networks which would complement additional housing in the area.
- Area 3 located on the most western side of Ballymena. The existing urban area has extended in a linear form. Further extension of this western area would extend

this unstainable linear form. The adjacent urban land uses within the settlement limits to the west are dominated by commercial and industrial uses. Residential development adjacent to this area may generate conflicting land uses which may prejudice the future operations of the existing industrial and commercial area.

- Area 4 is located to the south of Galgorm. It is dominated by an 85 acre estate of forest and parkland which surrounds Galgorm Castle (a listed building). The area is noted by the NILCA as an area of distinctive landscape owing to the setting of the estate and the River Main flood plain. Release of land in this area for residential purposes may pose a threat to the distinctive landscape as identified by the NILCA.
- Area 5 is located to the south of the town. This area is restricted by the line of the ring road. The road provides a physical barrier to contain the development of the town in a compact form. The area has significant undeveloped BAP zoned housing land inside the ring road. This would suggest that there is no need to expand the town in this area for housing given low market demand.
- Area 6 located to the east of Ballymena. The ring road provides a physical boundary to the east. The NILCA also notes this area to the east as a distinctive landscape area owing to the open river landscape character, which bring valuable green space into the town. It is therefore inappropriate location for future growth.

Future Growth Pattern

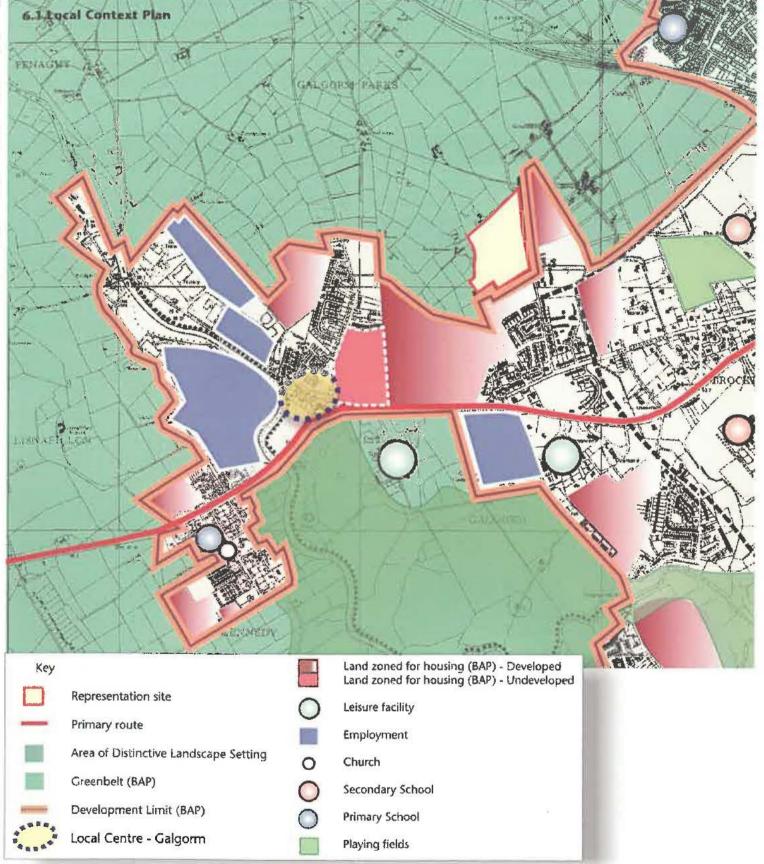
The principal opportunities for the expansion of Ballymena are to the north and west where there is least physical constraint presented by the road network and areas of high landscape quality, which combine to define the town setting. The NILCA notes that the rolling countryside to the north and the west of the town is under pressure for the development of individual houses and larger housing developments. It acknowledges that there is scope for some further small scale residential development in this area.



4.10 The shape and size of the existing urban area, the topography 4.11 The most obvious opportunity for plan led expansion of and setting and the disposition of its peripheral road network the existing urban area is to the west of Ballymena. Development suggests that development should not extend beyond the line of the of this land would provide the best opportunity for residential ring road to the east and south and that the concentration of released development according to the guiding principles for expansion of land should be to the north and west of Ballymena. Development land outside the existing development limit. The next section opportunities beyond the existing settlement limits should be assesses in detail the opportunities for expansion to the west of confined to logical rounding off rather than a significant peripheral Ballymena focussing particularly on the Galgorm area. expansion beyond the physical limit of the ring road. Land to the west of the settlement offers opportunity for rounding off the settlement.



5. SETTLEMENT ISSUES - GALGORM



5.1 Galgorm is located on the west side of Ballymena, approximately 2.5km from the town centre. It is an established 'villlage' which has been the focus of westward expansion of Ballymena. Galgorm is one of 15 ward areas within the urban area of Ballymena with a estimated resident population of 2850 in 2001. Galgorm is widely known for Galgorm Castle, now a converted gentleman's residence located within an 85 acre forest and parkland estate.

The area is a popular residentia environment with many local shops and services and a distinct identity within the wider urban area. Galgorm offers employment for the wider Ballymena area with a wide range of high order urban functions located within and around the area. These functions include leisure, offices, industry and education. Such examples include Galgorm Castle & Golf Course, Tullyglass House, County Hall, Gallaghers Tobacco Factory, Ballymena Business Centre, Ballymena Academy and Cambridge House Grammar School.

5.3 The area is well served in terms of public transport provision and is located within close proximity to the main train and bus station for the town.

5.4 Substantial land was zoned for housing in Galgorm under the Ballymena Area Plan 1986-2001. A significant proportion of this zoned land has now been developed or is currently under construction for housing. This demonstrates Galgorms status as a popular residential area located within the context of Ballymena town. The up take of the majority of zoned lands leaves a lack of capacity in this area to accommodate future demand to live in the Galgorm area.

Northern Ireland Landscape Character Assessment (NILCA)

5.5 The NICLA identifies the Braid River and Maine River providing a floodplain landscape setting to the east and south west of the town. It acknowledges that the wooded Galgorm Estate is an important local landscape feature on the edge of the Main River floodplain.

4.6 The NICLA identifies principles for siting and design of new development. In relation to Galgorm it states:

the rolling countryside to the north and west of the townis under pressure for the development of individual houses and larger housing estates. However it states that there is scope for some further small scale residential development in this area, but a substantial tract of open countryside should separate Ballymena from

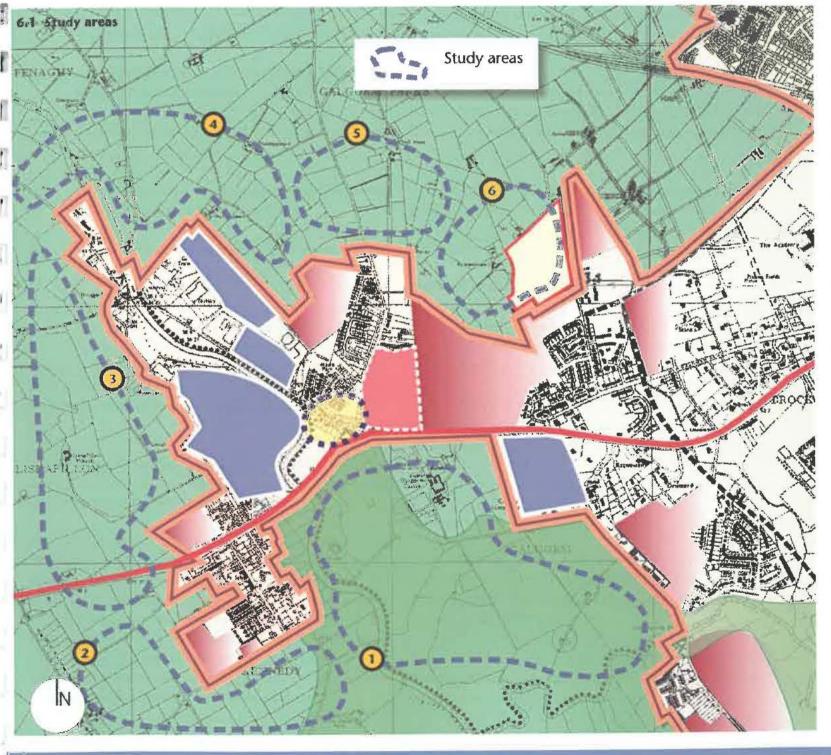
there is hardly any scope for further development in the Galgorm/Gracehill areas to the west; the small scale pastures and wetland character of the parkland around Lisfillian House and Galgorm Castle are particularly distinctive and the special character of all the small settlements in this area should be conserved.

Cullybackey;



6. POTENTIAL EXPANSION - GALGORM

6.1 As stated this representation seeks to identify a strategic opportunity for a fresh release of land to accommodate housing growth in the Galgorm area up to 2016. It is recognised that within the wider Ballymena town area there remains are areas of zoned housing which have not come forward for development. However, this land will not fulfil the ambitions of people to live in the Galgorm area. A review of BAP housing zones indicates that potential for further growth in Galgorm is limited when compared to other areas of the town. This limited potential together with market pressure to live on the west side of Ballymena, means there is a strategic need to expand the settlement limits of Ballymena in the Galgorm area.



6.2 Having assessed the potential expansion opportunities for Ballymena as a whole. The Galgorm area is specifically addressed below to consider its sustainability merits. Figure 6.1 illustrates an overview of the areas studied for potential expansion taking account the RDS sustainability principles. The paragraphs below provide an analysis of the suitability of each area for development taking account the RDS sustainability principles for the identification of new housing allocations.

Study Areas

- 1. Galgorm Castle this area is located south of Galgorm and is within the existing BAP green belt. It is currently utilised for recreational land, uses include Galgorm Castle, forest and park and Galgorm Golf Course. The Main River transverses this area. The area is also noted by the NILCA as an area of distinctive landscape owing to quality of both the estate and the River Main flood plain. Further expansion in this area would be contrary to the RDS principles in that development of this area would result in the loss of a landscape of significant environmental quality.
- 2 Gracehill/Ballykennedy This area is also located to the south west of Galgorm and known widely as Gracehill. The area is characterised by small field parcels. Further extension of the settlement in this area would add to the existing pattern of linear development in this area and would be contrary to the principles of the RDS in that its development would not deliver a compact urban form.
- development limits. The NILCA identifies the parkland around Lisfillian House as a distinctive landscape. Development in this area would create an unsustainable western extension to the town, contrary to the RDS sequential approach. The area is also adjacent to an existing commercial and industrial area. Housing in this area may restrict the future potential of the adjacent commercial and industrial area...
- **McFallston/Fenaghy** This area is on the north west edge of the settlement limits. The extension of the settlement limits in this location would create an unsustainable urban extension and close the gap between

Ballymena and the settlements Ahoghill and Cullybackey.

This area is also adjacent to existing commercial and industrial land. Housing in this area could restrict the future potential of this area. The area is also on the floodplain of the Maine River, so the development potential of the land may be restricted.

- **5 Dunlopstown** This area is located to the north west of the settlement. Development of this would area encroach further into the open countryside and would fail to achieve a compact settlement pattern.
- adjacent to the development limits and is physically linked to the existing urban form. The area is surrounded to the east, west and south by existing built development. It represents a gap/infill area in the context of the urban footprint. The representation is located to the east side of this area and offers an opportunity to achieve an expansion site which affords a high degree of integration with existing housing, employment, service and public transport networks. This area would round of the settlement in a compact and orderly form and avoids the loss of an area of high environmental quality.

The removal of the representation site from the BAP Green Belt will not present a threat to the strategic Green Belt objectives established in PSRNI (Policy GB/CPA1). The inclusion of this site within settlement limits will not:

- result in further urban sprawl considering the site is already surrounded by built development to the east, south and west;
- result in Ballymena merging with any of the surrounding settlements particularly Ahoghill and Cullybackey;
- pose any threat to the surrounding countryside given the urban context of the area;
- pose any threat to the setting of the settlement, as given the views of this area from the surrounding countryside would be read within the context of the existing urban area; and
- due to its relatively modest scale will not pose any threat to the regeneration of Ballymena.



7. SITE CONTEXT

Principles

- 7.1 The well established RDS and PPS principles in allocating new housing lands are as follows:
- maintenance of a compact urban form and avoidance of urban sprawl;
- avoidance of areas of significant environmental quality;
- integration with centres of employment, community services and public transport;
- protection of environmental setting, character and natural and built heritage;
- integration of new development without detracting from a settlement's distinct identity;
- respect for infrastructure capacity of utilities, public transport and social and community facilities.

Site and Surroundings

- 7.2 The proposed expansion site is located to the north west side of Ballymena and north of Galgorm. The site is roughly rectangular in shape and extends to approximately 6.4ha (15.8acres) over seven fields and is currently used as agricultural land.
- 7.3 The site is bounded by the Oldpark Road to the east, by a laneway to the north, by a watercourse to the west and by the Woodcroft housing development to the south.
- 7.4 Oldpark Road is characterised to the east side by housing (Oldpark Manor, Oldpark Avenue and The Close) and to the west side by open countryside (the representation site). The existing built development on the east side of the road extends to the north, beyond the northern boundary of the representation site. To the east boundary of the site along Oldpark Road, is restricted to a 40 mile speed limit and has a footpath and associated street lighting. Housing in the immediate area is of mixed density, scale and design.

Landscape Context

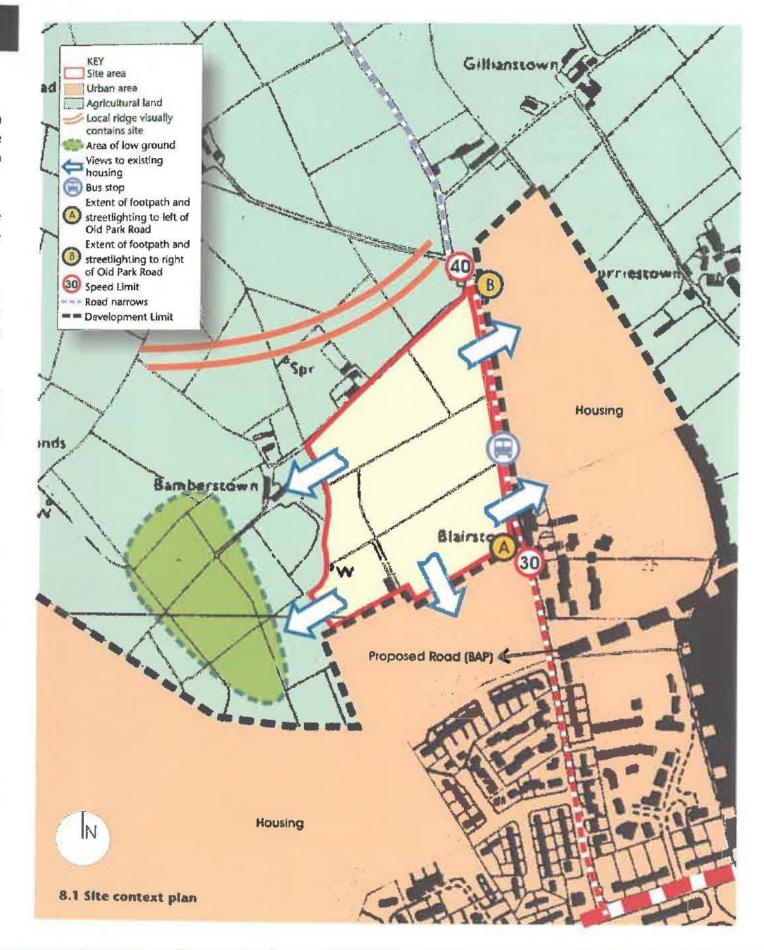
- 7.5 The landscape character of the site is defined by a number of natural features that can be used to maximise the quality of the proposed development and integrate it within the wider landscape context.
- 7.6 The land is generally flat but gently rises along the middle of the site. Each of the field parcels within the site are defined by mature hedge and tree boundaries.
- 7.7 The surrounding land to the south and east are urban in context, set within the development limits of Ballymena. The land to the north and west are currently undeveloped with the exception of some farm holding.
- 7.8 The combined effect of the site's topography and its the existing hedgerows and trees act to contain the site visually and restrict views of the site from the open countryside to the North West.

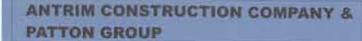
Site Access and Movement

- 7.9 The site is bounded to the east by the Oldpark Road. This road is a secondary road leading in a northerly direction from Galgorm.
- 7.10 Access to the site would be from the Old Park Road. Existing footpaths and street lighting are already in place to service the existing housing in the immediate area.
- 7.11 Public transport services run past the site.

Ecology

- 7.12 ATEC (Aquatic and Terrestrial Environmental Consultants) undertook an ecological survey of the site on the 28 August 2003. The survey included an appraisal of flora and fauna including bird life on the site.
- 7.13 In ecological terms the site comprises of cereal stubble and semi-improved pasture fields. Hedgerows are the most common form of field boundary.





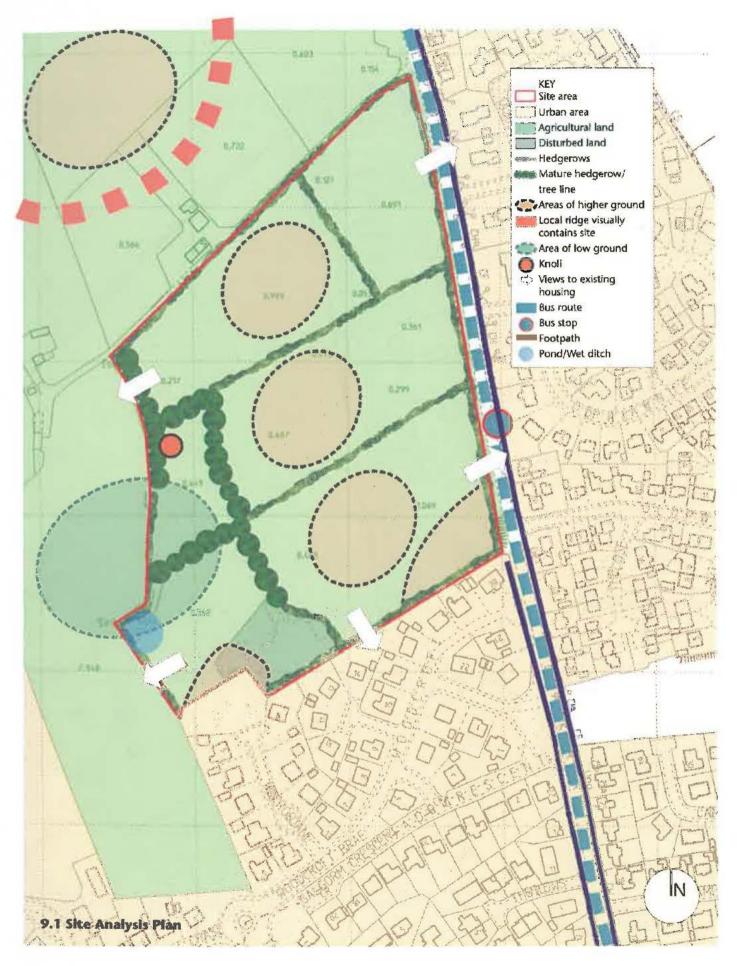
7. SITE CONTEXT ctd...

Habitat Description

- 7.14 The majority of the site is composed of species poor arable stubble and semi-improved pasture and is of relatively low botanical diversity. There is a complex network of interconnected field boundaries, consisting of species rich hedgerows with abundant semi-mature trees and a number of associated ditches which create a landscape suitable for supporting numerous plant and animal communities...
- 7.15 Arable fields comprise the major habitat on the site. Arable margins are species rich and generally exist in the areas which have not been managed. A small part of pasture exists within the site but has not been grazed for sometime.
- 7.16 Hedgerows are the most common type of field boundary. Roadside hedgerows and those surrounding residential areas are generally managed, no more than 2m tall and box shaped with few trees. Boundaries to the east of the site are tall (6-8m in height) and unmanaged with many semi-mature trees. Mature trees are a common feature of the field boundaries. Larger trees are more common towards the east of the site.
- 7.15 The eastern boundary of the site runs along a wet ditch. To the west exists a wet area (referred to as a pond) surrounded by mature trees and impenetrable thicket.
- 7.16 Waste ground/disturbed land exists in the south west corner of the site. The area comprise what may have previously been an old lane or dwelling as much of the ground is concrete. Large piles of earth and vegetation are piled in this area, much of which appears to have been dumped.
- 7.17 ATEC's report recommends standard mitigation measures should be adopted during the development of the site. ATEC recommends the following priority mitigation measures.
- retail all mature hedgerows;
- retain the hedgerows within the site;
- fully protect the pond area and ditch where possible, by allowing a 5m wide buffer zone of intact vegetation;
- Any necessary clearance of trees, hedgerow or areas of tall scrub should preferable take place outside of the nesting season, ie between September and early March.

Archaeology

- 7.18 Archaeological Development Services Ltd undertook a review of the archaeological potential of the representation site on 3 September 2003 (Appendix 2). The review concluded that there no known sites within the boundaries of the proposed development, although the wider area is archeologically sensitive being particularly well represented in the Early Christian period, with a number of known archaeological sites recorded within the vicinity of the proposal. None of these would be affected by the development.
- 7.19 As with all sites the review noted there may be archaeological deposits below the site surface. The site visit flagged up two areas which may have archaeological potential. The first area is along the ridge of higher ground on the site. It is noted that higher ground was often favoured as settlement areas, affording good drainage and better views of the surrounding countryside. The bias towards higher ground has been noted in the archaeological record dating from the Neolithic to Medieval periods.
- 7.20 The second area of archaeological potential is conversely, a low lying field and in particular there is a small knoll noted. The knoll has been interpreted as a possible Fulachta Fiadh. Knolls such as this are generally located close to a water source a stream or river, though marshy ground with standing water was also used.
- 7.21 The review makes recommendations on the appropriate mitigation measures which can be implemented regarding archeologically monitoring of the site at construction stage.



8. VISUAL ANALYSIS

8.1 This visual analysis aims to demonstrate the site and its surroundings, identifying elements which can be incorporated within future design concepts.

Photograph 1

8.2 West view across the site, illustrating the gentle topography along with mature field boundaries. A single dwelling occupies the south west corner immediately outside the boundary of the site.

Photograph 2

8.3 Existing lane which possibly accessed a former dwelling from the Oldpark Road. The lane is defined by mature boundaries.

Photograph 3

8.4 Laneway which runs along the south west part of the site, defined by mature hedgerow along the east boundary.

Photograph 4

8.5 View to the north west of the site, showing the rolling topography which dips towards the west boundary of the site.

Photograph S

8.6 View to the west of the site, showing the setting of Ballymena in the countryside going beyond the expanse of the representation site.

Photograph 6

8.7 West boundary of the site defined by a mature tree and hedgerow.

Photograph 7

8.8 West boundary of the site inter dispersed with mature trees, flat agricultural land.

Photograph 8

8.9 West boundary of site with mature hedgerows and trees.

Photograph 9

8.10 Oldpark Road, illustrating the urban context along the Oldpark Road. Footpaths, street lighting and 40mph speed limit in place.





9. DEVELOPMENT PRINCIPLES

Opportunities and Constraints

- 9.1 A number of issues have been identified in relation to the site. The opportunities and constraints of the site can be summarised as follows:
- The existing landscape features of the site have the potential to be retained and reinforced through additional planting as part of future development of the site. The existing peripheral tree and hedge boundaries of the site will provide screening for the site when viewed from the North.
- The opportunity should be taken to provide open space 9.6 features within the site.
- Some of the existing hedgerows can be used as rear garden boundaries to provide more beneficial habitats for a range of species.
- A new footpath should be provided along Oldpark Road. The opportunity should be taken to provide pedestrian permeability will be identified through the site.
- In terms of vehicular access, the opportunity exists for two vehicular site access points to be provided.
- It is considered that the frontage on to Old Park Road could be enhanced as part of the development. Buildings could be arranged so that their fronts will face the road, with as strong landscaped setting.

Built Form and Landscaping

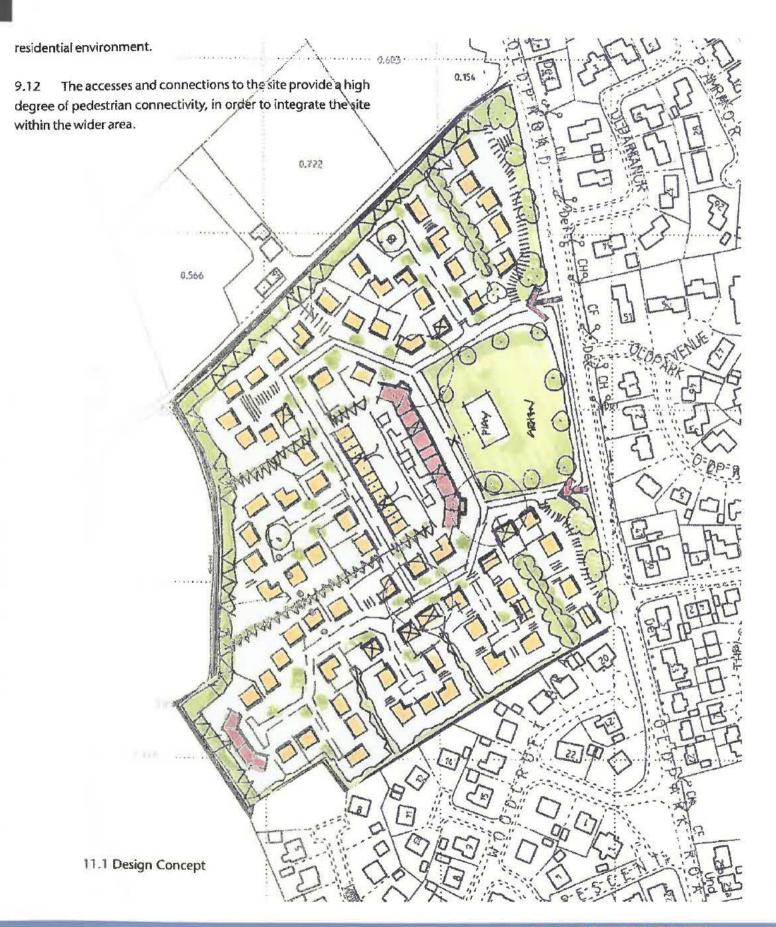
- 9.2 The proposed development of this site has been master planned to make the best use of the sites mature landscaped setting and delivering a development that will maintain a high quality of townscape, landscape and architectural design.
- 9.3 The development incorporates the existing landscaping features to provide key focal points and views within the development. The development layout uses these features to create a public realm that is 'legible', allows visitors to orientate themselves and find their way into and out of the area with ease.
- 9.4 The legibility of the development is also to be enhanced by providing a variety of dwelling types. A range of residential densities will also be provided to add variety within the overall development.

residential densities will also be provided to add vitality within the overall development.

- 9.5 The architectural style and form of the dwellings will be based on the surrounding developments. A mix of housing densities will be used, higher density clusters located to the centre and to the rear of the site and lower densities to the front and the periphery of the site. This overall mix of density will provide variety and offer the opportunity to provide high quality architectural style, townscape character and urban design in order to develop a genuine sense of place.
- 9.6 The form of development will reflect the existing local built form. This is based on the traditional form of development, whereby buildings are arranged to face the public realm, and private backs of houses are placed at the core of the block. This arrangement is necessary in order to create a lively, attractive and safe public realm. In particular, building entrances should face the street rather than be located at the rear, to keep the street scene overlooked and active.
- 9.7 The existing mature boundary provides a good degree of visual enclosure to the site. The existing trees and hedgerows within the site also provide a strong landscape focus. The proposals will seek to retain the existing boundary planting of hedgerows and trees, plus features within the site to create a development that responds positively to the landscape character of the area. The large area of open space to the front of the development, will provide a soft 'village green' edge to the development..

Summary

- 9.8 Development of this site can deliver a high quality area of residential development that can be well integrated with the surrounding context and complements the existing land uses within the area.
- 9.10 The quality of development will match the quality of the site, by providing a built form that respects the landscape setting and creates a strong sense of place in its own right.
- 9.11 The architectural style will be a mix of traditional terraces and townhouses and detached country house style dwellings, in order to create a legible and qualityinteresting





10. SUMMARY & RECOMMENDATIONS

10.1 The RDS identifies Ballymena as a main hub within the spatial framework for Rural Northern Ireland. It is noted by the RDS as having a well established sub-regional role and an extensive sphere of influence. Ballymena provides a strategic role as a centre for employment and services for the surrounding urban and rural communities. The RDS specifically states that centres such as Ballymena are expected to generate higher levels of future growth reflecting its established role and strength as a local engine of economic activity in the north sub region.

10.2 This representation has established the requirement for the emerging ABLAP to allocate additional land for greenfield development to accommodate future growth within Ballymena. The representation identifies Galgorm as an area which can absorb additional growth in a sustainable way. Through a review of peripheral land on the edge of Ballymena and a further review of peripheral land in the Galgorm area, an expansion site along Oldpark Road has been identified as a sustainable opportunity which warrants identification in the emerging ABLAP as a site for a housing development.

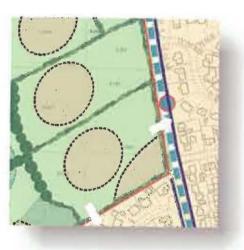
Future Growth Pattern

10.3 In summary the representation site:

- represents a logical rounding off of the existing urban area;
- is not in an area of significant environmental quality;
- is well located to centres of employment, community services and public transport;
- could be developed without detriment or harm to the setting of the town, its character, natural and built heritage;
- is serviceable and immediately available for development; and
- would not prejudice the strategic objectives of the Green Belt.

- 10.4 The development of the site is therefore consistent with the principles of existing planning policy as outlined by the RDS and relevant Planning Policy Statements. The inclusion of this site within the settlement limits would successfully contribute to the creation of a compact urban form.
- 10.5 The proposed design concept clearly illustrates how the site can successfully integrate into the existing urban form in terms of infrastructure and surrounding land uses.
- 10.6 As a consequence it can be argued that the inclusion of this site within the development limits of Ballymena would;
- achieve a compact urban form that respects the individual character and identity of Ballymena;
- represent a sustainable option for development in terms of its accessible location to existing services, public transport sources of employment and wider community facilities.
- 10.7 The development of the representation site would not have a detrimental impact on the setting of Ballymena, given that the public views of the site are restricted by the surrounding landscape and topography of the area.
- 10.8 On behalf of Antrim Construction Company and Patton Group we respectfully request that the representation site should be included with the revised development limits for Ballymena and specifically zoned for housing development.







On the ground in:

www.rta.co.uk



Appendix 7: Appeal Decision 2017/A0207

(Ballymena Area Plan 1986-2001

Road Scheme)



Appeal Decision

Park House 87/91 Great Victoria Street BELFAST

BT2 7AG T: 028 9024 4710

F: 028 9031 2536 E: info@pacni.gov.uk

Appeal Reference: 2017/A0207 **Appeal by:** Nuport L & R Ltd

Appeal Against: The non-determination of an application for full planning

permission

Proposed Development: Residential development of 9 no detached and 2 no semi

detached dwellings and garages with access from Old Park

Road

Location: Land east of Old Park Road, south of The Close, The Knowe

and The Hollow (off Old Park Drive) and north of Cameron

Park, Ballymena

Planning Authority: Mid and East Antrim Borough Council

Application Reference: LA02/2017/0878/F

Procedure: Informal Hearing on 9 May 2018

Decision by: Commissioner D McShane, dated 29 June 2018.

Decision

1. The appeal is allowed and full planning permission is granted, subject to the conditions set out below.

Preliminary Matter

2. The Council sought to submit new evidence to the Hearing. A segment of a preferred option drawing, which was discovered after the submission of the Statement of Case, was reported to give a more detailed projection of how the proposed connection road would tie into the existing road network and the proposed distributor road to the east of the site. The drawing was described as having been produced by Roads Service engineers over 20 years ago; it has not been subject to public consultation, has not been published, is not currently and never has been in the public domain. The drawing relates to a Roads Service scheme; however the DFI Roads witness stated that the scheme would be developer led. In this context, I have not been persuaded that the information is relevant to this appeal or that it would make any meaningful difference to my assessment. The Council readily accepted this approach and the appeal has been determined on the basis of the information already submitted.

Reasons

3. The main issue in this appeal is whether the proposed residential development would prejudice the implementation of a transport scheme identified in the Ballymena Area Plan 1986-2001 (BAP).

- 4. Section 6 (4) of the Planning Act (NI) 2011 requires that the determination of proposals must be in accordance with the local development plan (LDP) unless material considerations indicate otherwise. Notwithstanding that the Ballymena Area Plan 1986-2001 (BAP) was adopted in 1989 and is now 17 years after its stated end date, it operates as a LDP. The BAP envisaged 5 road schemes for Ballymena during the plan period. One of these is the west link, which includes a connection to Old Park Road. The 0.8 ha appeal site incorporates land required to implement the proposed connection road. Consequently, the proposal falls to be assessed against Policy AMP 4 of Planning Policy Statement 3: Access, Movement and Parking (PPS 3), which states that planning permission will not be granted for development that would prejudice the implementation of a transport scheme identified in a development plan.
- 5. Paragraph 5.30 of PPS 3 sets out three matters that must be taken into account in assessing whether the implementation of a particular scheme would be prejudiced by a development proposal: the nature of the proposal; the programming of the transport scheme; and the extent to which implementation of the scheme would be compromised by the carrying out of the proposed development.
- 6. The proposed west link transport scheme is shown on Map 2 of the BAP as an indicative dashed line. It runs from Ballymoney Road in the north to Galgorm Road in the south. In addition, it includes a connection, a short spur approximately 160m in length, to Old Park Road to the west. The purpose of the road scheme is not set out in the BAP; however, it seems reasonable to accept the rationale of DFI Roads that the west link was intended to serve as a distributor road that would divert traffic flow around Ballymena to ease congestion in the town centre while the connection to Old Park Road would increase interconnectivity from the distributor road to the western part of Ballymena. Land in this area that was zoned for housing in the BAP has since been developed. As such, the purpose of the road scheme is local and not strategic. I am reinforced in this conclusion by the statement in the Mid and East Antrim Borough Council Preferred Options Paper (2017), which indicates that "DFI has confirmed that all the road schemes yet to be implemented in the Borough are classed as "Non-Strategic Road Schemes".
- 7. In terms of programming, the BAP states that the west link is not likely to be implemented early in the plan period as it is anticipated that the existing system of roads will accommodate the anticipated traffic for a considerable time. Paragraph 7.2 of the plan states that the need for individual elements of the future highway network will be reviewed in the light of actual traffic growth and changing circumstances. Traffic flow is monitored on an ongoing basis. The blueprint map for Ballymena presented in the Sub Regional Transport Plan 2015, which was published in 2007, includes the indicative line of the west link road scheme; however the indicative connection to Old Park Road is not shown. The DFI Roads witness was unable to explain why the connection road had been omitted.
- 8. In terms of funding it was confirmed that the west link, including the connection road, does not appear in the Strategic Road Improvement Programme and nor is it listed in any other public construction roads programme. The expectation of DFI Roads is that the road scheme would be provided by developers. However, while a road corridor has been preserved free of development, the housing zonings have already been developed. Significantly, this includes the land immediately to the north and to the south of the appeal site. There is no indication that any of the

developers of the housing land were required to contribute financially to the provision of the connection road to Old Park Road or the wider scheme. In these circumstances, there is considerable uncertainty about how the road scheme would be funded.

- 9. The third matter to be addressed is the extent to which implementation of the scheme would be compromised by the carrying out of the proposed development. The housing development would have no impact on the wider west link scheme. Therefore, the question is whether it would compromise the connection road to Old Park Road.
- 10. It was not disputed that the connection road to Old Park Road does not represent the sole means by which interconnectivity from the proposed distributor road to western Ballymena may be achieved. Further opportunities are provided via Old Galgorm Road and Galgorm Road. However, I accept that it is likely that the proposed connection to Old Park Road would ease traffic on other junctions: namely the roundabouts at Galgorm Road and the access from Old Galgorm Road onto Galgorm Road.
- 11. It is noteworthy that the access road proposed from Old Park Road to serve the dwellings has been designed significantly above the standard required for a housing development of this scale; a 6m wide carriageway with 2m wide footpaths either side run the length of the site resulting in a total width of 10m. DFI Roads argue that this falls short of the standards required for a distributor road; a 7.3m wide road, 2m wide footpaths and 1m wide maintenance strips either side resulting in a total width of 13.3m. It was stated that the absence of a road to these dimensions would be contrary to the development plan; however the plan contains no specific advice on geometry and it refers clearly to this portion of the scheme as a connection road not as a distributor road.
- 12. With some flexibility in the dimensions of the road, the connection road and the housing development would not be mutually exclusive. However, there is a recognised pinch point at the eastern end of the site in the vicinity of Site 11 and the shared private drive to the dwellings on Site nos.10, 11 and 12. This is a full application; however the Appellant agreed that if it was considered necessary to overcome concerns, the proposed dwelling on Site 11 may be omitted from the development and this can be secured by condition. Such a reduction in the scheme would not cause any prejudice to the public and the description of development has been amended accordingly. Providing the dwelling on Site 11 is omitted from the proposed housing development, a connection road and the proposed housing development are not mutually exclusive. The erection of the remaining 11 dwellings would not prejudice the implementation of a connection road.
- 13. DFI Roads expressed concern that if the appeal development were to be approved an unacceptable precedent would be created for all other road schemes identified in the BAP, which are yet to be constructed. The road corridor as shown by the indicative dashed line in the BAP has been maintained free from development in its entirety for over 30 years. However, it is significant that the proposed housing development would impact only the connection road between the proposed distributor road and Old Park Road; a distinct portion approximately 160m long. Furthermore, I have already concluded above that, providing the dwelling on Site

- 11 is omitted, the connection road and the housing development can co-exist. Consequently, no unacceptable precedent would arise in respect of the west link distributor road corridor or other road schemes identified in the BAP. Accordingly, the Council has failed to sustain its draft reason for refusal based upon Policy AMP 4 of PPS 3.
- 14. A small stream marks the eastern site boundary; however a Drainage Assessment submitted with the application confirmed that there is no development in the floodplain. Furthermore, a drainage hydro-brake, which will be adopted and therefore maintained by NI Water, has been incorporated to ensure that surface water run-off will be maintained at green field rates. I have not been persuaded that the sewage system would be incapable of dealing with an additional eleven dwellings. I note that there is no objection from DFI Rivers or NI Water to the proposal. I have not been persuaded that there would be a negative impact on any protected or priority species. I am satisfied that the housing layout in terms of design and scale is acceptable. Furthermore, the design, separation distances and ground levels are such that any unacceptable overlooking or impact on light would be precluded. These Third Party concerns are not sustained.

Conditions

- (1) The dwelling on Site 11 shall be omitted from the development.
- (2) The development shall be begun before the expiration of five years from the date of this permission

This decision approves the following drawings, with the exception of the dwelling on Site 11, which shall be omitted from the development:-

- Drwg 01: Site Location Map (Scale 1:2500)
- Drwg 03: Site Analysis (Scale 1:500)
- Drwg 04: Concept Plan (Scale: 1:500)
- Drwg 05: House Type 'RG 2256' (Triple Aspect) Plans Section & Elevations (Scale1:100)
- Drwg 06: House Type 'RH 1382' Plans, Section & Elevations (Scale 1:100)
- Drwg 07/1: House Type 'RL 1774' (Dual Aspect) Plans, Section & Elevations (Scale 1:100)
- Drwg 09: Detached & Semi Detached Garage Plans, Section and Elevations (Scale 1:100)
- Drwg 10: Site Sections a-a and b-b (Scale 1:100)
- Dwrg 11: Road Construction Details (Scale 1:20, 1:25 and 1:200)
- Drwg 12/1: Private Streets Determination (PSD) Layout (Scale 1:250)
- Drwg 13: Road Sections (Scale as noted 1:500 and 1:100)

Drawings submitted with Statement of Case:

- Drwg 1708-10: Screen Walling and Fencing Details (Scale 1:50 and 1:20)
- Drwg 1708-01 LP Rev A: Landscape Proposals (Scale 1:500)
- Drwg 1708-01 Rev K: Site Plan Fencing and Walling (Scale 1:500)

COMMISSIONER D MCSHANE

2017/0878

List of Appearances

Planning Authority:- Mr H McAllister (Mid and East Antrim BC)

Mr G Lynch (DFI Roads)

Appellant:- Mr S Beattie (instructed by Donaldson Planning)

Mr D Donaldson (Donaldson Planning)
Mr J Keenan (Transportation Consultant)

Mr B Orr (TJK Consulting)

Third Parties:- Mr J Boland

Ms J Robinson Mr D Hoey

List of Documents

Planning Authority:- "LPA 1" Statement of Case

Appellant:- "AP 1" Statement of Case and Appendices

Third Parties:- "TP 1" Statement of Case

Appendix 8: RPS note on Developer-Led Road

Potential Development Site Old Park Road, Ballymena Highways Technical Note



Introduction

RPS have undertaken an initial feasibility assessment of the potential development lands for inclusion in Mid & East Antrim Plan (the lands are currently outside of the development limit). The location of the lands is indicated in Figure 1 below;



Figure 1 - Development Lands - Proposed for inclusion in Mid & East Antrim Plan

The potential development site is located between Old Park Road and Sand Road to the west of Ballymena Town Centre and is surrounded by residential development to the east, south and west, with green fields to the north.

Access Arrangements

From an initial desktop review of the development lands there are a number of potential access points through the existing housing lands and also directly onto Old Park Road. Access will primarily be via Old Park Road and Sand Road.

The Old Park Road frontage is ~310m and is subject to a 40mph speed limit. This frontage would be more than suitable to allow a site access with associated right turn ghost island to be provided to serve the site as a main access point.

Other minor accesses (subject to land availability) could be created via Woodcroft Chase / The Paddock / Woodcroft Brae junction, Woodcroft Hollow and Fairy Hill which would ensure good permeability throughout the site and connections to the wider network.

Bus stops and pedestrian facilities are currently provided on both Sand Hill and Old Park Road and therefore the site would also be accessible to public transport provision.

Ballymena Area Plan (1986-2001)

The currently adopted Ballymena Area Plan is the 1986 – 2001 version and RPS has undertaken a review of the information contained within this document to determine if there are any highway schemes in the vicinity of the site which would provide a benefit to the existing road infrastructure. An extract of the Area Plan is indicated in Figure 2.

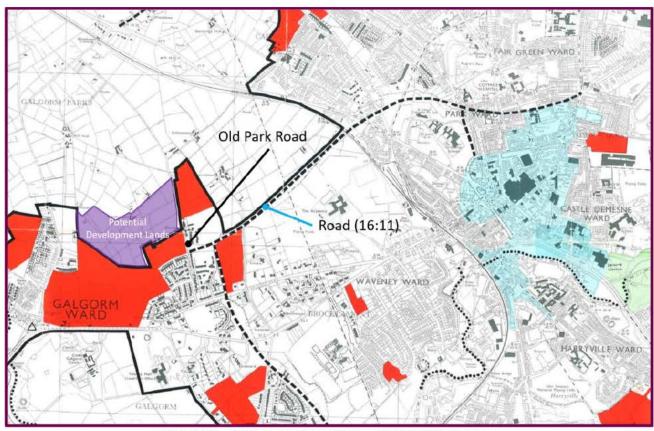


Figure 2 - Ballymena Area Plan - Highway Schemes

This road is identified in the Area Plan as 3. West Link Ballymena, Ballymoney Road to Galgorm Road with connection to Old Park Road. The Area Plan does go on to say that this road is not likely to be implemented early in the Plan period as in general the existing systems of roads within the Town will accommodate the anticipated traffic for a considerable time.

On review of the road line within Figure 2 and the aerial image in Figure 1 it is clear that the road line has been substantially protected for >30no. years from the date of the Area Plan (with the exception of 1no. commercial yard between Cullybackey Road and Carniry Road).

At a recent Planning Appeals Commission (PAC) hearing (Ref 2017/A0207) this section of Link Road was raised and DFI Roads confirmed that it would be a developer led scheme, with the West Link assisting in diverting traffic around Ballymena to ease congestion in the town centre, with the connection to Old Park Road increasing interconnectivity from the West Link to the western part of Ballymena. The road scheme is local and not strategic, which is reinforced by the Mid & East Antrim Borough Council Preferred Options Paper (2017) which indicates that DFI Roads have confirmed that all the road schemes yet to be implemented in the Borough are classed as "Non-Strategic Road Schemes". Therefore it would be likely that the development of this road scheme would be developer led. However, it is also clear that a number of parcels of land adjacent to the Link Road are now developed without any contribution towards future construction.

Traffic Impact

Should the development lands be included within the updated Area Plan then the traffic impact of the lands on the surrounding highway network would need to be considered in terms of both the existing highway network and the associated West Link.

Whilst it is envisaged that the existing road network could accommodate the traffic generation for these lands, consideration could be given to a contribution to the Link Road. However, it is unlikely that any 1no. developer will be in a position to provide the funding for the full Link Road and therefore it is important that, subject to detailed assessment and analysis and formal review by DFI Roads that a mechanism is in place to allow developers to make a contribution towards the Link Road.

However, whilst the Link Road was proposed in the 1986 – 2001 Ballymena Area Plan, more recently there has been a move away from the creation of more road space for vehicles and a promotion of sustainable modes of transport.

Therefore, it could be that the proposed contribution could be directed towards the West Link Road or redirected towards improving bus frequency to this area of town or potentially opening the corridor as a walking / cycling link between the residential lands and Ballymena Town Centre, which would enhance the use of sustainable modes of travel in this area of West Ballymena.

It is understood that DFI Roads would welcome any contribution to the proposed West Link Road.

Appendix 9: Housing Land Supply Analysis

Ballymena Housing Supply Analysis

Table 1: Review of Larger Type 1 Urban Capacity Sites

Ref	Size (ha)	Location	Potential Yield	Comment
9BA	4.92	Agricultural land to the north east, east and south east of 170 Galgorm Road		No planning application submitted
11BA	4.48	Agricultural land to the north west, west and south west of Cambridge House Grammar School	112	No planning application submitted
27BA	5.6	Former Concrete works	140	Unable to identify site
32BA	14.2	St. Patrick's Barracks	355	Outline planning permission granted for a mixed use regeneration scheme (LA02/2017/0997/O) in March 2019
44BA	2.04	Vacant house at no. 50 Woodtown Road and agricultural land to south	51	 Zoned within Ballymena Area Plan 1986 - 2001 Latest planning permission (G/2009/0655/O) granted February 2010 – appears to have lapsed
51BA	3.24	Land kept clear for proposed roadway north of St Louis Grammar School	81	No planning application submitted
6BA	1.74	Overgrown grassland and agricultural field to the north, north east and south east of 28 Cameron Park	44	 Zoned within Ballymena Area Plan 1986 - 2001 Planning permission for residential development of 12 dwellings (LA02/2017/0878/F); residential development of 5 dwellings (LA02/2018/1093/F); and residential development of 4 dwellings (LA02/2019/0237/F) granted in June 2018, February 2019 and June 2019 respectively
19BA	1.69	Agricultural land west of 127 Toome Road	42	No planning application submitted
26BA	1.33	Vacant site (previously John Crane UK Ltd) Queen Street	33	No planning application submitted
38BA	1.64	Vacant land south of 5 Kensington Park	41	No planning application submitted



46BA	1.64	Agricultural land north of 4 88 Carniny Road	41 (Zoned within Ballymena Area Plan 1986 - 2001
			•	 Planning permission (LA02/2017/1122/O) granted August 2018
60 BA	1.1	Lands to west Ballee Drive 2	28	 Zoned within Ballymena Area Plan 1986 - 2001 No planning application submitted
61BA	1.8	Lands to east Ballee Drive 4	45	 Zoned within Ballymena Area Plan 1986 - 2001 No planning application submitted
63BA	1.03	Land south of 114 2 Galgorm Road	26	Planning permission (G/2009/0499/F) granted for 13 units in September 2012
64BA	1.96	Land south of 106 Rosses 4 Farm, Tullaghgarley	19	 No planning application submitted
66BA	1.8	Housing Executive land with an application for open space pending redevelopment in Ballykeel 2	45 (Unable to identify site

Source: Technical Supplement 3 Appendix I – Urban Capacity Study, Table 4.1 plus LDP review and planning history searches.

Table 2: Review of Housing Land Availability Information on Larger Sites (2018)

HLA Ref	Type of Site	Potential Yield	Status
2694	Zoned	146	 Planning permission (LA02/2019/0146/RM) granted for 50 units in October 2018; PAN (LA02/2019/0681/PAN) submitted for a further 72 units
2730	Zoned	409	No planning application submitted
2732	Zoned	246	No planning application submitted
2737	Zoned	718	This site appears to be a duplicate of the Green Pastures site refs 15406 &1540 and so doubled counted in the Monitor
2741	Zoned	120	Planning permission (LA02/2017/0346/F) granted for 179 units on June 2018
15406	Zoned	125	Planning permission granted for 'new church buildings
15407 (Green	Zoned	92	and community leisure facilities comprising main auditorium, classrooms, meeting spaces, studio café,
Pastures)			crèche and ancillary offices; gym and fitness studio, 3G pitch; wedding chapel; associated car parking, internal



access roads including new link between Ballee Way and Ballee Road East; alterations to Ballee Road East and Larne Road Roundabout; site preparation works including regrading across site and other ancillary development' (Planning Ref: G/2013/0239/F & amended under Planning Ref LA02/2017/0634/F).

- Development of Church ongoing at present.
- Outline planning permission for mixed use (non residential) G/2013/0229/O on eastern part of site granted 20 May 2015.
- Outline planning permission G/2013/0230 granted 30 March 2015 includes provision for nursing home & up to 213 units of mixed supported housing.

Source: 2018 Housing Land Availability Report plus planning history searches



Appendix 10: Note on Housing Lead in Times (Turley Economics)

Briefing

Lead-in Times

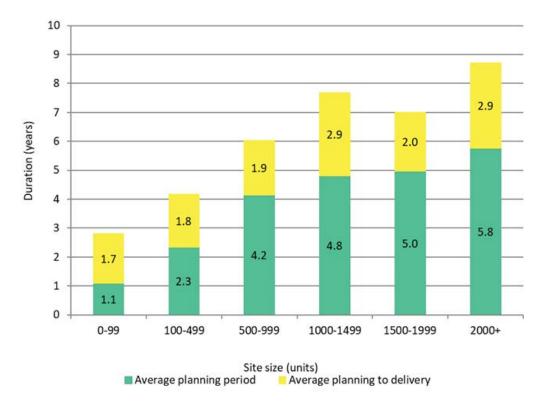
December 2019

- 1. There is a "lead-in time" before homes are completed which spans the period from initial site promotion through to completion of the first home on that site.
- 2. To determine how many dwellings may be deliverable in the plan period, it is necessary to make a reasonable judgement to estimate the lead-in time from allocation and/or application, to completions on site.
- 3. In order to provide a reasoned justification for such a judgement, it is necessary to have a sufficiently robust evidence-based understanding of the factors which will affect lead-in times on housing sites. This needs to recognise that there are a multitude of factors which can influence the time taken to progress a site through to the point at which it delivers homes, including market conditions, the promoters' financial position, market considerations and specific planning challenges. Furthermore, on a site by site basis, consideration needs to be given to the size and complexity of the development, accounting for whether there is a need for land assembly or infrastructure provision for example. These factors can have significant implications for the length of the lead-in time.
- 4. In general terms, it is important to recognise that the whole process captured within a lead-in time can include, but is sometimes not limited to:
 - Site promotion to securing an allocation;
 - Site acquisition;
 - Preparation of supporting evidence, survey data potentially a masterplan or development brief, where appropriate;
 - Public consultation;
 - Securing a planning consent;
 - The disposal of phases to suitable developers (if required) and the agreement and exchange of contracts, including securing relevant insurances, finance and legals;
 - Discharge and agreement of pre-commencement conditions;
 - Design, approval and completion of initial preparatory works and provision of infrastructure connections;
 - The commencement of building the new homes;
 - Discharge and fulfilment of pre-occupation conditions and requirements; and



- The completion of the first home on that site.
- 5. Available research into the issue of lead-in times on around 200 housing sites in England and Wales¹ provides valuable context, mindful that the above factors will similarly influence developers in Northern Ireland. It reveals the average time taken for sites of different sizes to secure planning permission and then progress to delivery, as illustrated in the following chart.

Figure 1: Average Planning Approval Period and Delivery of First Dwelling by Site Size



Source: Lichfields, 2018

- 6. The research confirms that, in England and Wales, the time taken to secure full planning consent typically increases with site size. It is notable that there is a significant jump between the average time taken to approve a scheme with less than or more than 500 units, which is foreseeable to an extent given that larger sites can potentially have greater environmental impacts and infrastructure requirements and will therefore need to resolve a wider range of potential issues than smaller schemes. Accepting the principle and agreeing the detail of development is often more time consuming in such circumstances, and this can be compounded where outline rather than full planning permission is sought given that such applications generally progress at a slower rate owing to the twin determination stages that give rise to a greater potential for issues and delays.
- 7. The planning to delivery period is also longer for larger sites, albeit with less variance than might have been expected. Indeed, earlier comparable research based on a more limited sample of sites had indicated that smaller sites actually took *longer* to deliver the first home after planning

¹ Lichfields (October 2018) Driving housing delivery from large sites [blog] updating the "Start to Finish" report produced in 2016



^{*} note: 0-99 homes category understood to exclude sites with fewer than 50 units

approval, on average². While this no longer appears to be the case, the broad commonality now shown across sites of all sizes means that a reasonable lead-in time can be expected in most if not all circumstances. This must be properly recognised in developing a housing trajectory, because reliance on sites coming forward for development at unprecedented speed risks failing to meet housing needs and artificially downplaying the contribution required from other sites.

- 8. The above draws on national research which is considered to provide important context in establishing reasonable judgements for sites of more than 50 dwellings. However, in order to develop a robust trajectory, it is recommended that the Council undertakes more detailed analysis of the lead-in times recorded locally for a comparative sample of sites delivered over recent years. This should include a disaggregation of analysis to understand locally specific average lead-in times for sites of different sizes (i.e. sites of under 50 dwellings, 50 dwellings to 99 dwellings, 100 to 249 dwellings and larger sites of 250 dwellings plus). Such analysis should also seek to ensure that the review of sites covers a representative period of housing market cycles, to ensure that it is not unduly skewed towards either a period of comparatively poor market conditions or unrepresentatively positive periods of development activity.
- 9. The presentation of such analysis will ensure that a robust assessment of locally specific and reasonable assumptions around lead-in times are built into a trajectory. Recognising the importance of ensuring flexibility and mitigating risk, it is considered appropriate that such assumptions adopt a comparatively prudent approach. This also recognises that over the plan period there will be inevitable market cycles which will, as reflected in the period following the recession, potentially have significant impacts on the pace at which development progresses.

6 December 2019

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² NLP (2016) Start to Finish: how quickly do large-scale housing sites deliver? p8

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