



Local Development Plan 2030

draft Plan Strategy Response Form

September 2019

www.midandeantrim.gov.uk/planning



**Mid & East
Antrim**
Borough Council

Mid and East Antrim draft Plan Strategy 2030

Overview

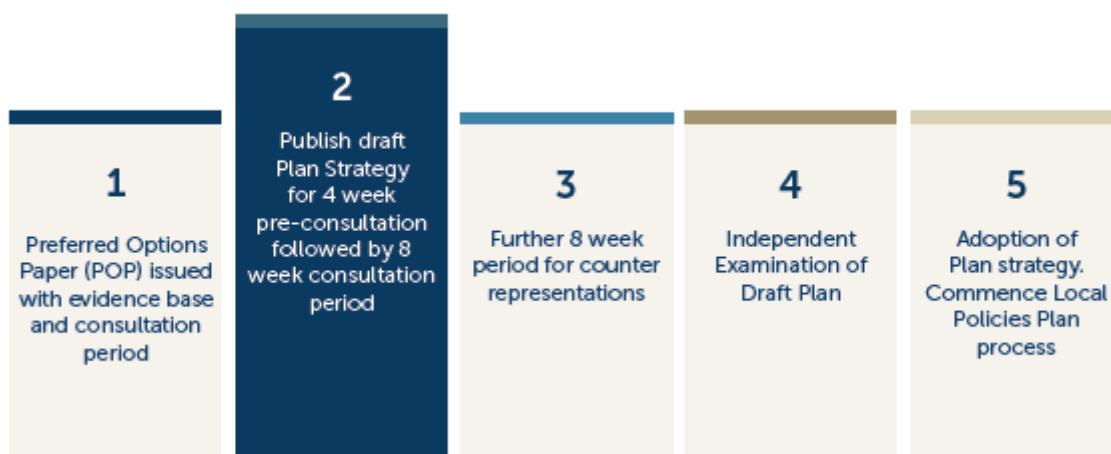
The Local Development Plan is primarily about delivering sustainable development and improving the quality of life and wellbeing of communities in Mid and East Antrim. It sets out a Spatial Growth Strategy underpinned by other strategic policies and proposals as a means of ensuring that development is high quality, meets local needs and is located in the appropriate places convenient to jobs and public services.

The Local Development Plan will also balance competing demands ensuring that new development respects our quality landscapes and our precious natural and historic environment, all of which expresses the unique identity of our Borough and underpins our growing tourism sector. Through guiding future development and use of land in our towns, villages and rural areas, the Local Development Plan will provide certainty as, under the new Plan-led system, it will be the first thing to be taken into account by Council when taking planning decisions. The Local Development Plan is a powerful tool for place-shaping and will assist in the delivery of our Community Plan 'Putting People First'.

The draft Plan Strategy sets out how our Borough will grow and change up to the year 2030. It puts forward our Plan vision and strategic objectives for the future. It also contains a Spatial Growth Strategy and supporting Strategic Spatial Proposals indicating where growth should be directed in the Borough. It also sets out a range of Strategic Subject Policies under the five key themes of Sustainable Economic Growth; Building Sustainable Communities; Transportation, Infrastructure and Connectivity; Stewardship of our Built Environment and Creating Places and Safeguarding our Natural Environment, which together will support the Spatial Growth Strategy and inform future planning decisions.

How we got here

The draft Plan Strategy is the first of two documents, which comprise the Local Development Plan. Once adopted, it will be followed by the Local Policies Plan which will set out our detailed site-specific proposals such as land use zonings and local designations such as settlement limits and town centre boundaries. The draft Plan Strategy has been developed following extensive engagement with the public, stakeholders and our elected Members and follows on from the publication of our Preferred Options Paper in June 2017. The key stages in this phase of the plan making process are shown below



How We Are Consulting

The easiest and quickest way to comment is by completing our online response form:
consult.midandeastantrim.gov.uk

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

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

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

Section A. Data Protection

Local Development Plan Privacy Notice

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

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

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

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

Why are we processing your personal information?

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

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

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

Section B. Your Details

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

Please only tick one

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

Q2. What is your name?

Title

Mrs

First Name **(Required)**

Angela

Last Name **(Required)**

Wiggam

Email

angela.wiggam@turley.co.uk

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

- ☐ Yes ☒ No ☐ Unsure

Section C. Individuals

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

Section D. Organisation

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

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

Organisation / Group Name **(Required)**

Your Job Title / Position **(Required)**

Organisation / Group Address (if different from above)

Address Line 1 **(Required)**

Line 2

Line 3

Town **(Required)**

Postcode **(Required)**

Section E. Agents

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

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

Hagan Homes

Client Contact Details

Title

First Name (Required)

Last Name (Required)

Address Line 1 (Required)

181 Templepatrick Road

Line 2

Line 3

Town (Required)

Ballyclare

Postcode (Required)

BT39 0RA

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

Please only select one.

☐ Agent ☐ Client ☒ Both

Section F. Soundness

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

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

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

Section J. Type of Procedure

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

Please select one item only

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

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

Section K. Is the draft Plan Strategy Sound?

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

Sound

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

(Required)

Section L. Unsound

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

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

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

https://www.planningni.gov.uk/index/news/dfi_planning_news/news_releases_2015_onwards/development_plan_practice_note_06_soundness_version_2_may_2017.pdf

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

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

See Enclosed Representation

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

See Enclosed Representation



**Mid & East
Antrim**
Borough Council

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

Tel: 0300 124 5000
planning@midandeantrim.gov.uk

www.midandeantrim.gov.uk/planning

Representations to Mid & East Antrim Borough Council Draft Plan Strategy

On behalf of Hagan Homes

December 2019

Contents

Executive Summary	i
1. Introduction	1
2. Legislative Compliance	2
3. Strategic Housing Allocation	3
4. General Policy for all Development	11
5. Building Sustainable Communities	12
6. Transportation, Infrastructure and Connectivity	27
Appendix 1: Technical Review of Evidence Underpinning Housing Growth Strategy	
Appendix 2: Greenisland Development Framework	
Appendix 3: Proposal Site	

Contact

Angela Wiggam
Angela.wiggam@turley.co.uk

Client

Hagan Homes

Our reference

BESB3001

Executive Summary

1. This representation is submitted on behalf of the Hagan Homes who welcomes the opportunity to submit comments on the draft plan strategy issued by Mid & East Antrim Borough Council (MEA).
2. We appreciate that this draft Plan Strategy is the first, Local Development Plan prepared by MEA and offer these comments as a 'critical friend' who is keen to see the smooth progression of the draft Plan Strategy from a consultation document to an adopted Plan Strategy.
3. We support the ambition and drive of MEA in terms of its vision for the Council area however, having reviewed and considered the Local Development Plan, we consider the Plan to be unsound. The legal compliance tests have not been met, and the following policies contained within the Draft Plan Strategy are unsound.
4. The table below summarises the changes sought.

Schedule of key draft Policy Comments

Policy	Comment
Strategic Housing Allocation & SGS3	<p>In formulating the Strategic Housing Allocation (SHA) consideration has not been given to other data sets in generating the overall housing number. The policy is not formulated on an up-to-date evidence base and does not contain an appropriate degree of flexibility to respond to market changes.</p> <p>The Strategic Housing Allocation and SGS3 is unsound as the Allocation and associated policy fails soundness tests C3, CE2 and CE4</p>
Draft Policy GP1	<p>The draft policy is inconsistent with the SPPS presumption in favour of sustainable development</p> <p>Draft Policy GP1 is unsound as the policy fails soundness test C3.</p>
Draft Policy HOU1	<p>The draft policy introduces a varied approach to the existing policy position and is not supported by any robust evidence to justify a variation.</p> <p>Parts of the policy are incoherent.</p> <p>Draft Policy HOU1 is unsound as the policy fails soundness tests C3, CE2 and CE3.</p>
Draft Policy HOU5	<p>The draft policy is not supported by a robust evidence base and in its current form would conflict with the SPPS.</p> <p>The Council has failed to consider the implementation of the policy and the potential implications on viability and provision of particular housing types.</p>

Draft Policy HOU5 is unsound as the policy fails soundness tests C3, CE1, CE2, CE3 and CE4.	
Draft Policy HOU6	<p>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.</p> <p>A number of recommendations are provided below to ensure a 'sound' plan</p> <p>Draft Policy HOU6 is unsound as the policy fails soundness tests CE2, CE3 and CE4.</p>
Draft Policy HOU7	<p>The policy is not formulated on an up-to-date evidence base and does not contain an appropriate degree of flexibility.</p> <p>Draft Policy HOU7 is unsound as the policy fails soundness tests CE1, CE2 and CE4.</p>
Draft Policy OSL4	<p>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.</p> <p>A robust, up to date evidence base should be prepared to support this draft policy.</p> <p>Draft Policy OSL4 is unsound as the policy fails soundness tests C3, CE2 and CE4.</p>
Draft Policy TR6	<p>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.</p> <p>Draft Policy TR6 is unsound as the policy fails soundness tests C3, CE 2, CE3 and CE4.</p>

1. Introduction

- 1.1 Turley submits this representation on behalf of Hagan Homes, and welcomes the opportunity to return comments on the Mid & East Antrim Draft Plan Strategy.
- 1.2 In line with Council's procedures, each representation is set out on a separate page within each of the Chapter headings with the policy clearly identified.
- 1.3 The structure of the submission is as follows:
 - **Chapter 2:** Provides an assessment of how the draft Plan Strategy addresses the legislative compliance tests;
 - **Chapter 3:** Details our representations to the Strategic Housing Allocation SGS3;
 - **Chapter 4:** Provides specific commentary on the housing allocation to Greenisland re SGS3;
 - **Chapter 5:** Details our representations to the General Development Policy for all Development;
 - **Chapter 6:** Details our representation to the Housing policies set out in Building Sustainable Communities; and
 - **Chapter 7:** Details our representation to the Parking and Servicing policy.

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.

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 ('DfI') 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 published the dPS within the 3rd Quarter of 2019 as indicated in the approved timetable; the document was publicly available from 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 the 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 out with the agreed timeframe and could result in further conflict with the timetable.

2.6 On the basis of the information available, the draft Plan Strategy fails Procedural Test P1 as the draft Plan has not been prepared in accordance with the approved timetable.

3. Strategic Housing Allocation

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:
 - CE2 and CE4 Coherence and Effectiveness
 - C1 and C4 Consistency
- 3.3 SGS3 fails to identify a sufficient number of new homes with the effect that the under-allocation could potentially undermine the Spatial Growth Strategy and the core principle of sustainable development by not promoting an appropriate number of new homes to main and small towns.
- 3.4 The draft Plan Strategy (dPS) has failed to take account of the RDS insofar as its direction on the role and scale of growth envisaged within settlements within the plan area and accordingly fails Consistency Test C1.
- 3.5 The plan does not sufficiently recognise the cross-boundary connection with Belfast, it also fails Consistency Test C4 and Coherence and Effectiveness Test CE1.
- 3.6 In preparing the overall housing number, consideration has not been duly given to other factors which influence housing growth. Unlike other dPS, Council has not considered other options in formulating the Strategic Housing Allocation other than the Housing Growth Indicators (HGI's) and accordingly fails Coherence and Effectiveness Test CE2.
- 3.7 A full explanation of these points 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 latest¹ 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 of Elected Members, a robust level of resourcing (within the LDP team, consultees and that of the Independent Examiner), as risks.

¹ https://www.midandeantrim.gov.uk/downloads/MEA_LDP_Timetable.PDF

- 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 making 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.
- 3.13 Belfast City Council has taken a slightly longer term view and established a plan period to 2035. It published its POP in January 2017. Derry City & Strabane District Council has set out a plan period to 2032. It published its 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. 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, this would not be a welcome part of the debate for the new Council's first plan.
- 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 Housing Growth Indicators (HGI): recessionary trends and suppressed build rates.

- 3.16 DfI published 2016 based Housing Growth Indicators (HGIs) in September 2019. Whilst the HGI for MEA remained at 5,400 and did not change, the 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 SPSS 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 a '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 the 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
MU	9500	10300	800	8
NMD	10900	10000	-900	-8
	94000	84700	-9300	-10

- 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 p.43).

- 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 comparison would suggest that the split may be of the order of 61/39, so significantly shifting against the Belfast Metropolitan Urban Area 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 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 upon 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 DfI and dPS insofar as there is an acknowledgement that they are for guidance, not a cap/target to be met² (etc), the dPS approach is to adhere to it as far as possible because it *finds no sound reason for departing from it*.³ 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. 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 2006⁴, is projected forward to 2030 ($12 \times 661 = 7932$), or 2035 ($17 \times 661 = 11,237$) the housing requirement would be much higher. A further, more detailed, critique of the evidence base used to support the Housing Growth Strategy is set out in Appendix 1.

Greenisland: Unlocking development potential

- 3.25 Greenisland lies approximately 2.5 miles south west of Carrickfergus between the Shore Road (A2) and the Upper Greenisland Road (B90). The settlement is a popular residential location due to its attractive setting on the Lough Shore and its proximity to Belfast; Belfast is 7 miles away and can be accessed via car and public transport (both bus and rail).
- 3.26 Future growth and expansion of the settlement is constrained due to the shoreline setting of the settlement and Knocknagh Escarpment which runs adjacent to the Upper

² Technical Supplement 3 (TS3): Housing para 7.7.

³ Technical Supplement (TS3): Housing para 7.8.

⁴ Average new dwelling starts in Ballymena (410), Carrickfergus (***) & Larne (230) 1999-2003 were much higher.

Road and provides a dramatic backdrop to the settlement. There are landscape wedges which separate Greenisland from its neighbouring urban areas of Jordanstown and Carrickfergus, and the dualling of the Shore Road provides a clear defensible boundary along the north eastern edge of the town.

- 3.27 The draft plan strategy recognises Greenisland as a small town together with 4 other settlements – Ahoghill, Broughshane, Cullybackey and Whitehead. Yet this role is a demotion from its position within the Carrickfergus Area Plan 2001 and draft the Belfast Metropolitan Area Plan 2015 when it was identified as a town.
- 3.28 The dPS contains contradictory comments about Greenisland. We note that *policy SGS5 Management of Housing Supply* identifies Greenisland as being on an equal footing to the 3 Main Towns, but yet the designation of the settlement as a small town has significantly curtailed its allocation. Similarly, positive comments about the capacity of the settlement are noted within the transport technical supplement. *Technical Supplement 9: Local Transport Study* recognises Greenisland as being an accessible location, primarily due to its access to both the road and rail network. Once again, it places the settlement on the same footing as Ballymena, Larne and Carrickfergus in terms of transport infrastructure.
- 3.29 Over the last 6 years, the rate of housing completions in Greenisland has been one of the highest after the 3 Main Towns. 261 units have been completed; an average of 43.5 units per year. Yet the allocation to the town within the dPS having accounted for approved units stands at 96 units. Based on the housing completion rate this points to a 2 year land supply for the settlement which, while described as a small town, is performing at a higher level given the implied references in the dPS. A land supply of 2 years fails to take account of paragraph 6.140 of the SPPS which directs the LDP's should, as a minimum, ensure that a 5 year supply of land for housing is maintained.
- 3.30 An examination of the housing monitor identifies a remaining capacity within Greenisland of 365 units of which approximately 165 units have the benefit of planning permission but have yet to be commenced. This leaves 200 units of which 100 relate to a zoned housing site GD04/07. No applications have been submitted on this site in the last 5 years, however, working on the basis that this site may in the future make a contribution in the immediate term there is the potential for 100 units to address current housing requirements. This again points to a housing land supply of approximately 2 years.
- 3.31 A closer examination of the information detailed at Figure 7.5 of *Technical Supplement 3*, page 37 identifies that Council understands that there is the potential for approximately 136 units to be delivered on fringe whiteland and undeveloped sites. We note in the supporting text at paragraph 7.35 that figures associated with urban fringe sites are estimates based on a desktop assessment. Yet these figures combined within information in the Housing Monitor and the current level of unimplemented approvals are used to support the case that there is no requirement for additional housing lands within the Greenisland.
- 3.32 Notwithstanding our commentary of the use of statistical data, in formulating the allocation to Greenisland, we can find no analysis which demonstrates that a detailed assessment was undertaken of the settlement to inform the Strategic Housing

Allocation (SHA) to Greenisland. We acknowledge that *Technical Supplement 3: Housing* refers to the six Housing Evaluation Framework (HEF) tests and that they have been applied to the top three tiers of the settlement hierarchy, yet the outworkings of this are not provided in *Technical Supplement 2 – Settlement Hierarchy and Strategic Settlement Evaluation*. The supplement does not contain an evaluation of each settlement as undertaken for other draft Plan Strategies.

3.33 We would have expected that the SHA to Greenisland would have been informed by a detailed analysis of the settlement based on the HEF tests and consideration given to the Regional Development Strategy and other relevant plans, policies and strategies relating to the council's district. Specifically, consideration should have been given to:

- The unique context of the town being within the BMA travel to work corridor as defined within the Regional Development Strategy and requirement of the BMA to support Belfast as the economic driver for the Region
- The Greenisland Development Framework produced in 2015 which identified:
 - That the town was well served by community assets – football clubs and complex; youth centres, Primary Schools, Churches and medical services (GP surgery; dentist and pharmacy)

The opportunity (page 25 of Framework, extract enclosed in Appendix 1) to deliver a modest extension to the settlement limit of the town through the inclusion of lands bound by the dualling of the A2 at Whinfield Lane. The residential assessment which accompanied the Framework identified the importance of providing starter homes within the town as well as opportunities for retirement living. Appendix 3 sets out further information on the case for the inclusion of these lands within the future settlement limit of Greenisland

3.34 We take the opportunity to remind Council of the Planning Appeals Commission commentary into the Ards and Down Area Plan when the commissioner noted that, *'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'*. Based on the information contained within the dPS it appears that the SHA has been a largely mathematical exercise primarily predicated on the HGI for the Council area.

Soundness Test

3.35 Draft policy SGS3 Strategic Allocation of Housing to Settlements fails to satisfy the following soundness test:

- C1 - Did the council take account of the Regional Development Strategy?
- C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

- CE2 - 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 reasonably flexible to enable it to deal with changing circumstances

Recommendation

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

- Re-evaluates the evidence base used to formulate the SHA and gives consideration to other scenarios which influence future housing requirements as discussed in Appendix 1
- The weight attached to the HGI balanced against other key planning documents – The RDS and SPPS is reconsidered
- The findings from other Council strategies – Frameworks and Masterplans which will have considered housing requirements and the importance of place making from a bottom up approach, rather than top down, married together with specific locational requirements is evaluated by way of Strategic Settlement Evaluation for all towns

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 acknowledge 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:

- 4.4 “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.”

- 4.5 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.

- 4.6 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 other material considerations may be applicable. As drafted, Policy GP1 does not facilitate the balanced approach to assessing development proposal.

- 4.7 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 upfront 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.”

5.6 The wording here is unclear as the policy sets a requirement for a Concept Master Plan for all development but then goes on to specify that it is only required in particular circumstances. As drafted this lack of clarity would fail against soundness test CE2 and CE3.

5.7 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 QD1. The council has failed to provide evidence to justify the departure for the threshold set out in PPS7 and therefore does not comply with soundness test C3.

- 5.8 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 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.”

- 5.9 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

- 5.10 Draft Policy HOU5 sets out the Council draft policy position on the provision of affordable housing. Essentially it seeks to secured 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.
- 5.11 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.
- 5.12 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.
- 5.13 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.”

- 5.14 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.”

5.15 The SPPS is therefore clear that the HNA should inform the LDP. Whilst the Council has reference 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.

5.16 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.”

5.17 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 that there is a number of weakness 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 pre-commencement 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

5.18 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.

5.19 The council has acknowledged in the supporting evidence that there are variations in the 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.

- 5.20 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 were considered. On this basis, there is a conflict with soundness test CE3.
- 5.21 Technical Supplement 3 sets out that the approach set out in the POP⁵ has evolved as a result of further analysis and discussions with NIHE.
- 5.22 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.
- 5.23 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.”
- 5.24 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.
- 5.25 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.
- 5.26 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).

⁵ Every 10th Unit in a housing scheme to be social

This would not be consistent with the dPS and therefore the LPP could be unsound. The same paragraph also reinforces the view 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.

- 5.27 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 2011 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%.”

- 5.28 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.

- 5.29 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.”

- 5.30 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

- 5.31 Draft policy HOU5 fails to satisfy the following soundness test:

- P3 – Has the Council prepared its Preferred Options Paper and taken in to 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

- 5.32 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.

5.33 This approach is well established within other jurisdictions.

5.34 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 facility the reuse of heritage assets.

Draft Policy HOU6 – Housing Mix

5.35 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.

5.36 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.

5.37 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’.*
- 5.38 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.
- 5.39 It is clear that draft Policy HOU6 proposes to utilise the threshold identified in HS4. However, having reviewed, draft policy HOU6 and 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.
- 5.40 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).’*
- 5.41 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.
- 5.42 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).
- 5.43 Our client shares DfI’s concerns and considers 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 DfI at the POP stage would conflict with soundness test P2.
- 5.44 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’.*
- 5.45 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).’

- 5.46 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’.

- 5.47 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).*
- 5.48 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.
- 5.49 The ‘Justification and Amplification’ states that the proposed policy facilitates 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.
- 5.50 Developers, will deliver a housing product which is bespoke to that 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.
- 5.51 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.
- 5.52 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

- 5.53 Draft policy HOU6 fails to satisfy the following soundness test:
- P3 – Has the Council prepared its Preferred Options Paper and taken in to 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

5.54 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

5.55 The dPS identifies draft policy HOU7 as being an operational policy that will help to achieve the SPPS objective of nurturing ‘balanced communities’.

5.56 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’.

5.57 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’.

5.58 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.

- 5.59 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'.
- 5.60 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 test CE2.
- 5.61 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.
- 5.62 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).
- 5.63 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.
- 5.64 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.
- 5.65 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'.
- 5.66 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'.

- 5.67 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.
- 5.68 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.
- 5.69 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

- 5.70 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.
- 5.71 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.
- 5.72 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

- 5.73 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, re-consults 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

- 5.74 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.
- 5.75 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.
- 5.76 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.
- 5.77 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;
- 5.78 The 'Justification and Amplification' section of draft Policy OSL4 proposes to introduce the mechanism of developer contributions which is not referred to/contained in PPS 8.
- 5.79 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.
- 5.80 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:
- 5.81 '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'.
- 5.82 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.

- 5.83 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.
- 5.84 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:
- 5.85 '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.'
- 5.86 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.
- 5.87 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

- 5.88 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

- 5.89 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.

5.90 On the basis of the evidence collated, Council should reassess whether they have sufficient evidence to support this draft policy position.

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 (DfI).
- 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 PPS3 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 DfI’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 *‘adequate’* 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’*.
- 6.15 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 DfI’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.

Appendix 1: Technical Review of Evidence Underpinning Housing Growth Strategy

- The overall Strategic Housing Allocation for the Plan period is 7,477 dwellings which minus completions is reduced to 4,614 dwellings. The draft Plan Strategy (dPS) explicitly strives to ‘*deliver sufficient housing*’⁶ 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...”*⁷
- 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 Local Development Plan (LDP) to ‘assist in promoting sustainable economic growth’⁸. 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’⁹. Housing is recognised as ‘essential’ in support of the delivery of sustainable economic development¹⁰.
- Whilst the Council has correctly identified the importance of providing housing through the plan-making 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 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 housing¹¹.
- 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*’¹².

⁶ Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Draft Plan Strategy, paragraph 4.1.3

⁷ *Ibid*, paragraph 5.3.1

⁸ *Ibid*, paragraph 4.15 and p44

⁹ *Ibid*, paragraph 5.4.3

¹⁰ *Ibid*, paragraph 7.1.1

¹¹ Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Technical Supplement 3: Housing

¹² Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Draft Plan Strategy, paragraph 5.3.5

- The reliance on the HGI to justify its policy on housing provision sits in contrast to the simultaneous and correct acknowledgement¹³ 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 '*guidance, rather than a cap on housing development in the area or a target to be achieved*'.
- 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*'¹⁴, 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 which equates to 385 dwellings per annum on average.
- 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*'¹⁵.
- The following analysis comments on the drivers of local housing need and demonstrates 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

- 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).
- At the outset, it is important to recognise that:
- "*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*"¹⁶

¹³ *Ibid*, Appendix A

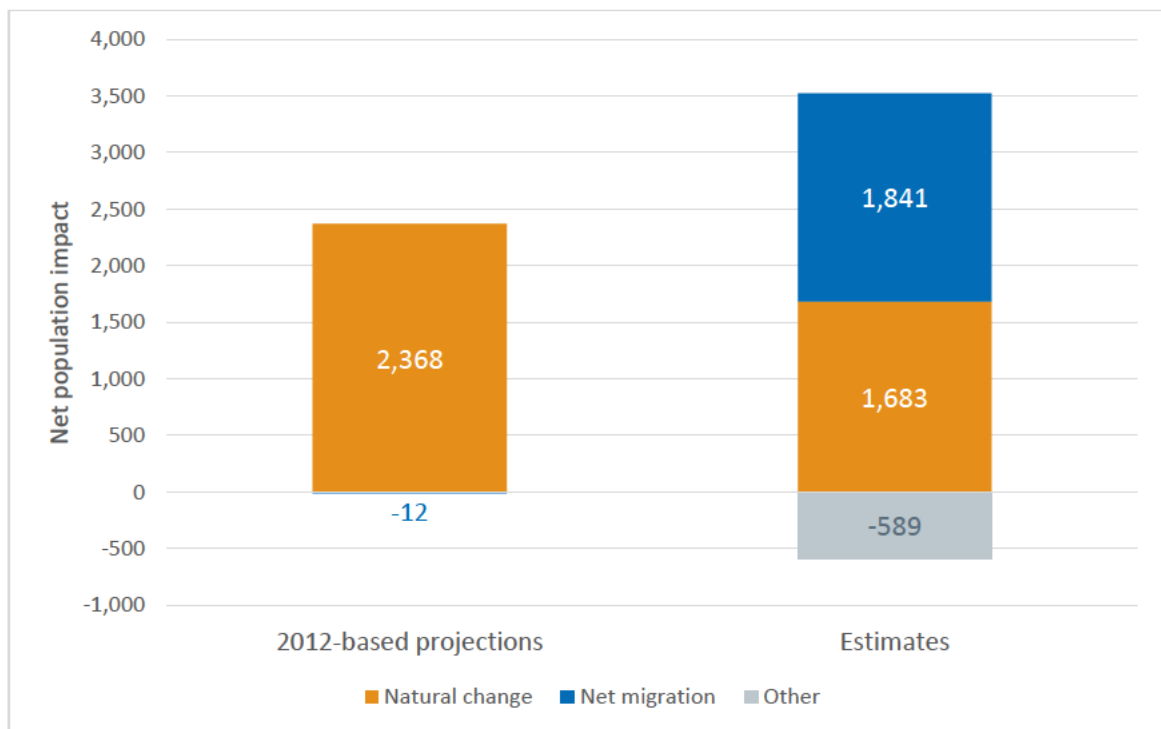
¹⁴ *Ibid*, p62

¹⁵ Department for Infrastructure (2019) Housing Growth Indicators: 2016-based, paragraph 2.1

¹⁶ NISRA (October 2014) Statistical bulletin: population projections for areas within Northern Ireland (2012-based)

- 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’¹⁷.
- 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 2018¹⁸.
- 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” changes¹⁹.

Figure 3.1 Components of Actual and Projected Population Change in Mid and East Antrim (2012-18)



Source: NISRA; Turley analysis

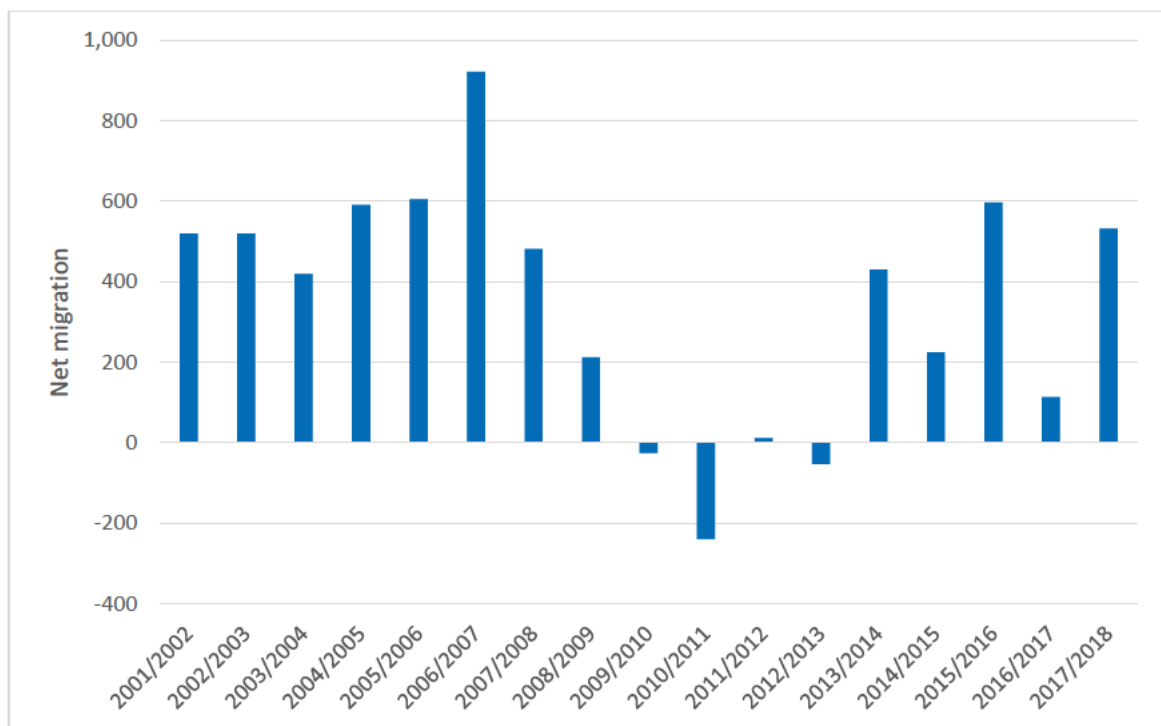
¹⁷ Office for National Statistics (2019) National Population Projections: 2018-based statistical bulletin; Office for National Statistics (2019) National Population Projections: 2016-based statistical bulletin

¹⁸ NISRA (2019) Mid Year Population Estimates

¹⁹ 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

- 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 nature²⁰. 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 3.2 Historic Net Migration to Mid and East Antrim (2001-18)



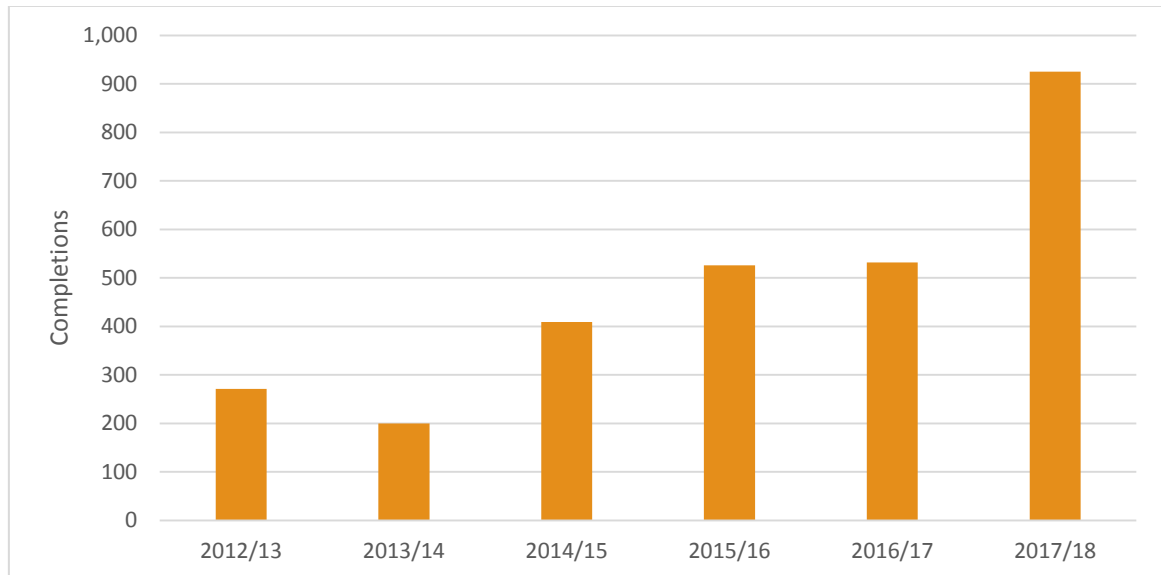
Source: NISRA

- As has already been outlined above and illustrated in Figure 3.1, 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 and retaining

²⁰ 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)

people as the rate of housing development has increased in recent years, as shown in the following chart²¹.

Figure 3.3 Housing Completions in Mid and East Antrim (2012-18)



Source: Mid and East Antrim Borough Council

- 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.
- 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.
- 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 consultation²². This should not be automatically viewed as an endorsement of the Council’s strategy, however, as it would remain a

²¹ Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Technical Supplement 3: Housing, Table 7.4

²² NISRA and Department for Infrastructure (September 2019) Housing Growth Indicators, 2016-based

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:

- 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.
- 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.

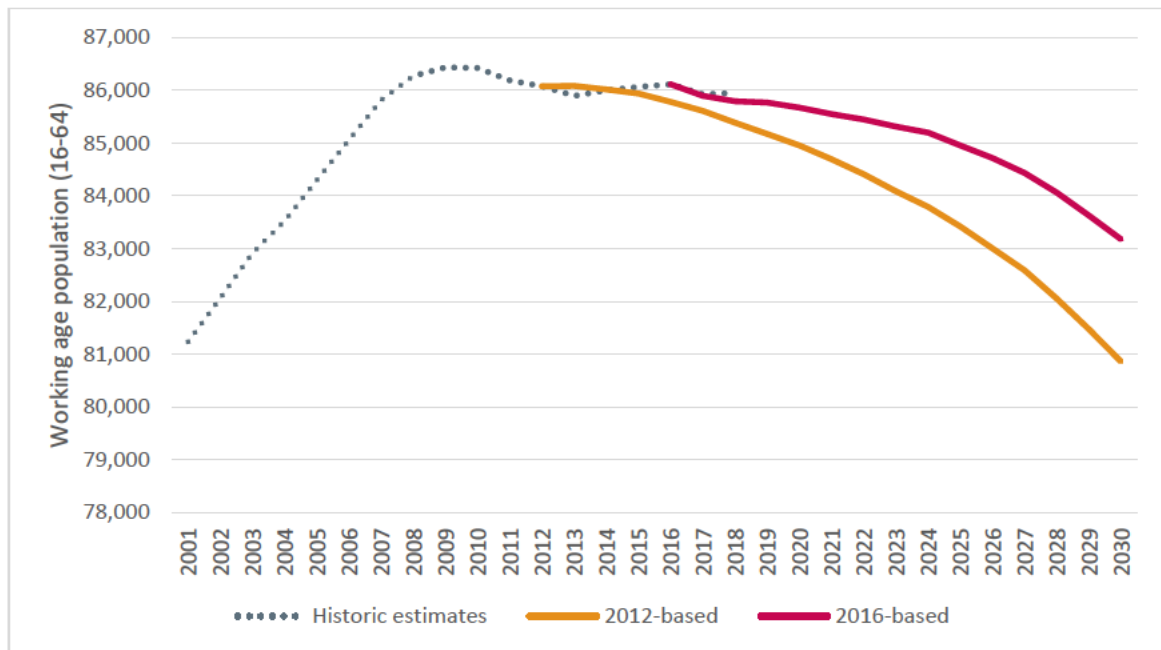
Relationship with the Economy

- 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 behaviour²³. 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.
- 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

²³ NISRA (October 2014) Statistical bulletin: population projections for areas within Northern Ireland (2012-based)
p3

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.

Figure 3.4 Historic and Projected Working Age Population in Mid and East Antrim



Source: NISRA

- 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 economy²⁴. 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*'²⁵. 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.

²⁴ Mid and East Antrim Borough Council (September 2019) Local Development Plan 2030 Draft Plan Strategy, paragraph 4.1.5

²⁵ *Ibid*, paragraph 5.42 and p121

- 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 provision²⁶.
- 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 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

- Our assessment 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.
- 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.
- 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.
- 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

²⁶ 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

seen to result from their basic underestimation of *need*, as appears likely from the analysis in this paper.

- 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.

Appendix 2: Greenisland Development Framework

MEA-DPS-073

Greenisland

Development Framework



Greenisland

Development Framework

March 2015

Table of Contents

1. Purpose
2. Context
3. Analysis
4. Consultation
5. Visioning and Objectives
6. Proposals
7. Action Plan
8. Delivery and Next Steps

Greenisland Development Framework Compendium of Appendices (see www.midandeastantrim.gov.uk)

Appendix A	Stage 1 Baseline Report
Appendix B	Land Use Survey
Appendix C	Planning History Analysis
Appendix D	Built and Natural Heritage Analysis
Appendix E	Stakeholder Engagement Strategy
Appendix F	Consultation Record
Appendix G	Indicative Costings

1. Purpose & Organisational Structure

1.1 Introduction

Carrickfergus Borough Council (CBC) and their funding partner, the Department of Social Development (DSD) appointed URS (now trading as AECOM) in June 2014 to prepare a Development Framework for the settlement of Greenisland. The Development Framework is a non-statutory masterplan and will provide an outline for the promotion, implementation and timing of urban regeneration, physical, social, economic and community development initiatives in the settlement over the next 10-15 years.

The settlement of Greenisland has many physical and natural assets yet there are issues requiring attention. Its situation strikes the balance between being within a 20 minute train journey to Belfast City Centre yet is on the periphery of the Belfast urban area and nestled between the stunning Knockagh Escarpment and Belfast Lough. Despite the advantages that Greenisland has there are considerable challenges that need to be addressed: areas of deprivation, physical and socio-economic severance between the railway and the lack of an identifiable heart. The aim of this study is to identify projects which will ensure the economic and social viability of the settlement for

generations to come.

Normally, urban regeneration, community development and tourism initiatives are developed through a Town Centre Masterplan however considering Greenisland's unique status as a small settlement without an identifiable Town Centre or core, a Development Framework approach was selected as the appropriate means of exploring the regeneration potential of the area and identifying a core.

1.2 Project Structure and Team

The project commenced in June 2014 and the final report was presented on 2nd February 2015. The project has been overseen by the Greenisland Regeneration Steering Group (GRSG). It consisted of the following representatives:

- The Mayor
- Elected members
- Council officers
- Statutory bodies including DOE Planning, DSD, Transport NI, NI Housing Executive, NI Library Service etc
- Local community representatives
- Consultants from URS.

The GRSG has met on the following occasions throughout the course of the project:

- 24th June 2014
- 21st August 2014
- 29th September 2014
- 17th November 2014
- 20th January 2015

There were also various operational meetings with Carrickfergus Borough Council and DSD throughout the course of the project.



The consultancy team comprised the following organisations:

Organisation		Role
URS		Lead consultants, town planning and design
Roderick MacLean Associates		Survey analysis
NEMS		Telephone surveying
Lisbane Consultants		Transport consultants
McConnell Chartered Surveyors		Property consultants



Members of the Greenisland Regeneration Steering Group engaged in discussions during a workshop

2. Context

2.1 The Study Area - Geographical Context

Greenisland is fortunate to be blessed with a superb geographical setting. The Knockagh Escarpment runs adjacent to the Upper Road and provides a dramatic backdrop to the settlement. The south of Greenisland borders Belfast Lough along the A2 which is part of the Causeway Coastal Route, renowned as one of the most scenic driving routes in Europe. Belfast Lough also provides access to a public beach via "The Gut" at low tide. Landscape wedges separate Greenisland from its neighbouring urban areas (Jordanstown and Carrickfergus) creating enough separation for Greenisland to have a distinctive character and classification in its own right. However the lack of an identifiable centre or heart is a

"Greenisland is a popular residential location due to its attractive setting on the Lough Shore and its proximity to Belfast. It is a dormitory commuter settlement for Belfast, with a focus of local retail activity in the small shopping parade at Glassillan Court complemented by a number of local shops dispersed throughout the settlement."

Strategically, the town is accessed mainly by the A2 which is currently being upgraded. The enhanced A2 will provide excellent vehicular and cycling links to Belfast City Centre and Carrickfergus/Larne. Greenisland Railway Station is situated in the centre of the settlement and is an invaluable public transport asset which provides regular links to Belfast City Centre with journey times of 20 minutes and to Carrickfergus in 9 minutes.



2.2 Historical Context

Although today Greenisland is an extended suburb of Belfast, its origins lie with its ties to Carrickfergus. In the 1600s, the West Division of Carrickfergus was established to allocate lands for agricultural purposes west of the town extending to Greenisland. In the 1800s the area along the Shore Road became a popular destination for wealthy merchants to construct summer lodges and bathing houses. It was around this period when the name Greenisland was introduced, due to a mossy islet being exposed at low tide along this stretch of coastline.

In 1845 the railway line was developed in the area. The Belfast to Ballymena line was diverted via a turntable at Greenisland because of the steep gradient at Whiteabbey. The intersection was initially known as Carrickfergus junction however this was changed to Greenisland in 1893 with the construction of a new station.

The improved transport connections led to the development of modest semi-detached dwellings springing

up around the station. The increase in local population required improved access to facilities and so churches and schools began to open in the area. The 9-hole golf course was originally opened in 1894 and the Knockagh monument was erected in memorial of the people of County Antrim lost during the 1st and 2nd World Wars.

After the wars, Greenisland's population was on the increase due to local employment opportunities at the Courtaulds factory and the ease of travel in general to Belfast and Carrickfergus. The "upper estate" was proposed in response to these needs by the Northern Ireland Housing Trust. Initially, 900 new homes were planned to be built by government funds between 1957 and 1958. In 1963 the large ICI factory in the vicinity was opened and in response to demand the lower estate was then developed.

The area is therefore an unusual mix of historic and 20th century (1921 - see below) built development and with that combination there are also socio-economic differences.



2.3 Socio-Economic Context

Greenisland is made up of three wards, Gortalee, Knockagh and Greenisland. Knockagh and Greenisland wards extend further than the extent of the study area for this project (which is the settlement development limits designated by draft Belfast Metropolitan Area Plan), however the 2011 Census data provides a wide range of information and illustrates the contrasting socio economic profile of various areas of Greenisland.

Multiple Deprivation Measures

The Northern Ireland Multiple Deprivation Measure (NIMDM) 2010 provides information on seven types of deprivation and an overall measure of multiple deprivation for small areas.

Wards are ordered from most deprived to least deprived on each type of deprivation measure and then assigned a rank. The most deprived ward is ranked 1, and as there are 582 wards, the least deprived ward has a rank of 582. The deprivation rankings for the Greenisland wards are given in the table below.



Knockagh Ward Boundary



Greenisland Ward Boundary



Gortalee Ward Boundary

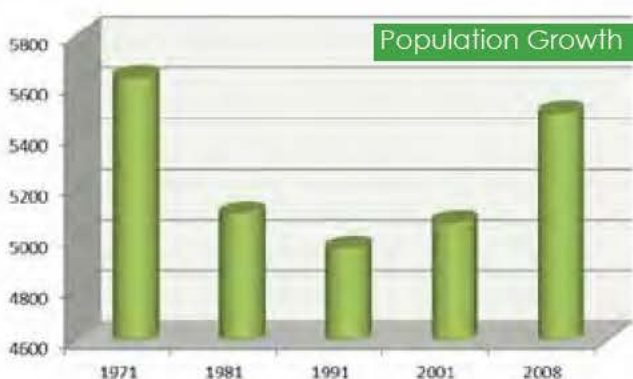
Multiple Deprivation Measure	Gortalee	Knockagh	Greenisland
Multiple Deprivation Measure	152	566	508
Income Deprivation	152	543	486
Employment Deprivation	144	553	491
Health Deprivation and Disability Deprivation	196	543	475
Education Skills and Training Disability	82	569	405
Proximity to Services Deprivation	464	320	370
Crime and Disorder	283	390	326
Living Environment	140	518	464

The following key points can be highlighted:

- Significant contrasts between the 3 wards
- Knockagh ward is ranked very highly and as such is almost one of the least deprived areas in Northern Ireland
- In comparison, Gortalee is very low on the multiple deprivation measures indicating that it is one of the most deprived areas in Northern Ireland
- This can be highlighted by the difference in educational performance between the wards, with Gortalee having only 13.29% of people with a degree or higher education qualifications compared to almost 40% for Knockagh.

2.4 Population Statistics

Greenisland as a settlement had an estimated population of 5,498 during the 2008 settlement development limit estimate. The population of the settlement is rising from early 1980's, illustrated by the graph below. This rise in population may place increasing need on public service provisions within the settlement and pressure on development lands and sites to provide housing and services to cater for the new residents in the longer term.



2.5 Policy Context and Reform of Local Government

2.5.1 Planning Policy Context

A comprehensive review of planning policy at a local and strategic level was undertaken as part of the baseline study for Greenisland. The findings of this can be found in the Stage 1 Baseline Report, which is attached as Appendix A in a separate compendium. The following planning documents were analysed:

- **Carrickfergus Area Plan**

The former area plan for Greenisland. It is now superseded by BMAP 2015

- **Belfast Metropolitan Area Plan 2015**

BMAP 2015 is the current statutory local development plan for the settlement of Greenisland.

- **PAC Report on draft BMAP 2015**

The report details the PAC's recommendations to DOE on objections raised during the consultation period – which include those relating to Greenisland.

- **Regional Development Strategy 2035**

The RDS provides an over arching strategic planning framework to facilitate and guide the public and private sectors. It does not redefine other Department's strategies but complements and guides them from a spatial perspective.

- **Living Places Urban Stewardship Design Guide (DOE)**

This design guide aims to raise the standards of place making across NI. The management of our towns and places has previously been addressed separately from the planning and design process. Living Places provides strategic guidance to public and private sector developers.

2.5.2 Carrickfergus Borough Council Policy Context

Various documents and policies issued by Carrickfergus Borough Council were reviewed as part of the information gathering stage. The findings of this can be found in the separate compendium of appendices.

- Carrickfergus Town Centre Masterplan
- CBC Sustainable Development Audit and Action Plan
- CBC Play Strategy
- CBC Health and Well Being Strategy and Action Plan
- Whitehead Village Masterplan.

2.5.3 Reform of Public Administration

Reform of Public Administration (RPA) is a process that aims to reduce the amount of local councils in Northern Ireland from 26 to 11. The aim is to have stronger and more efficient local councils that deliver a wider range of services such as planning, community planning, economic development and regeneration.

Greenisland will see some major changes due to a review of

administrative boundaries in terms of electoral wards and local council boundaries. The settlement of Greenisland currently consists of 3 electoral wards, Knockagh, Greenisland and Gortalee (these are examined in more detail in the socio-economic profiling chapter). The RPA proposals would see the settlement consist of 2 wards. Knockagh ward is proposed to be abolished and replaced with an extension of Gortalee and Greenisland wards. The Greenisland ward will now extend between the Upper Road and Belfast Lough to the edge of Carrickfergus settlement. Gortalee has claimed land from Greenisland along the Shore Road and also most of the Farm Lodge development north of the railway line under the reform proposals.

Greenisland currently exists within the extent of Carrickfergus Borough Council's jurisdiction. Under the proposed changes, a portion of the settlement to the south east (Hartley Hall development) would be contained within the Antrim and Newtownabbey Council whereas the rest of Greenisland would be within the new Mid and East Antrim Council.



Mid and East Antrim New Ward Boundaries

3. Analysis

3.1 Introduction

A wide range of information gathering and survey methods have been used as part of the analysis stage of the Greenisland study. The mechanisms have ranged from field surveys through to desktop analysis and telephone surveys. The variety of methods used has enabled us to build a detailed profile of how Greenisland is operating today and assists in informing decisions on future proposals.

3.2 Land Use Surveys

A detailed survey of the land uses in Greenisland has been undertaken to gain an understanding of the existing conditions of the settlement. A more detailed version of the land use plan can be found in the separate compendium of appendices. The following observations on land use can be made:

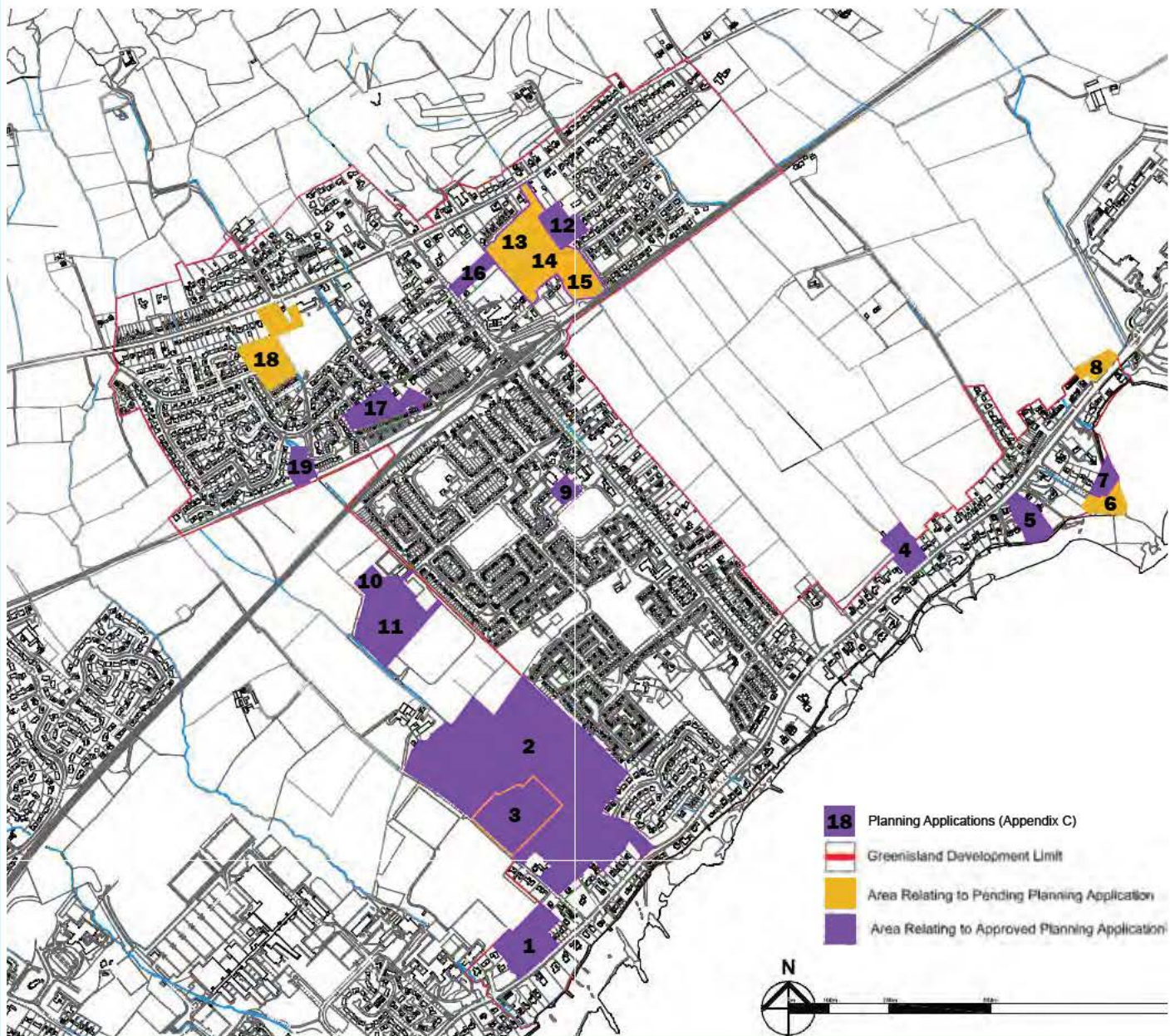
- The majority of land use in Greenisland is for residential purposes.
- It is clearly visible that there are a large proportion of community based land uses present (churches, community buildings, schools, clubs) considering the size of the settlement.
- There is an absence of a clearly defined settlement / commercial core. Retailing is dispersed in small pockets throughout the settlement but low in quantity.
- The Gortalee area (middle estate) has a large proportion of land used as public open space. It is arguable that there is an imbalance of the provision as the area to the north of the railway line has limited open space within its residential areas. In regard to the large development opportunity sites identified for housing, many have witnessed a commencement of development.



3.3 Significant Planning Approvals

A detailed review of relevant planning decisions has been undertaken. The map below shows locations of approvals deemed to be of significance to the wider development. A more detailed version of the drawing can be found in the separate compendium of appendices. The following observations can be made:

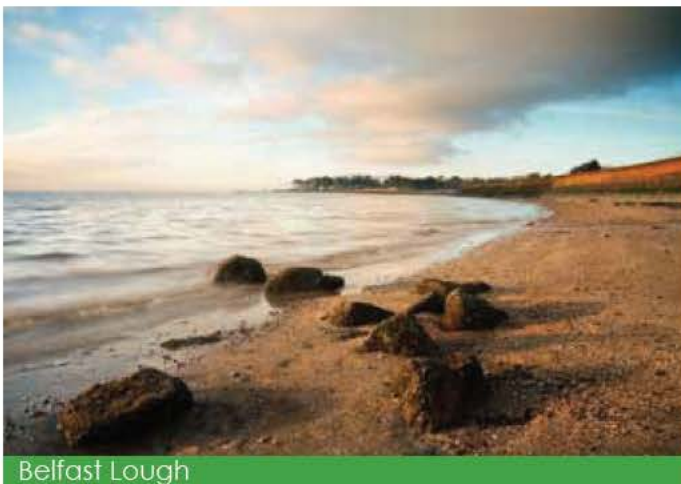
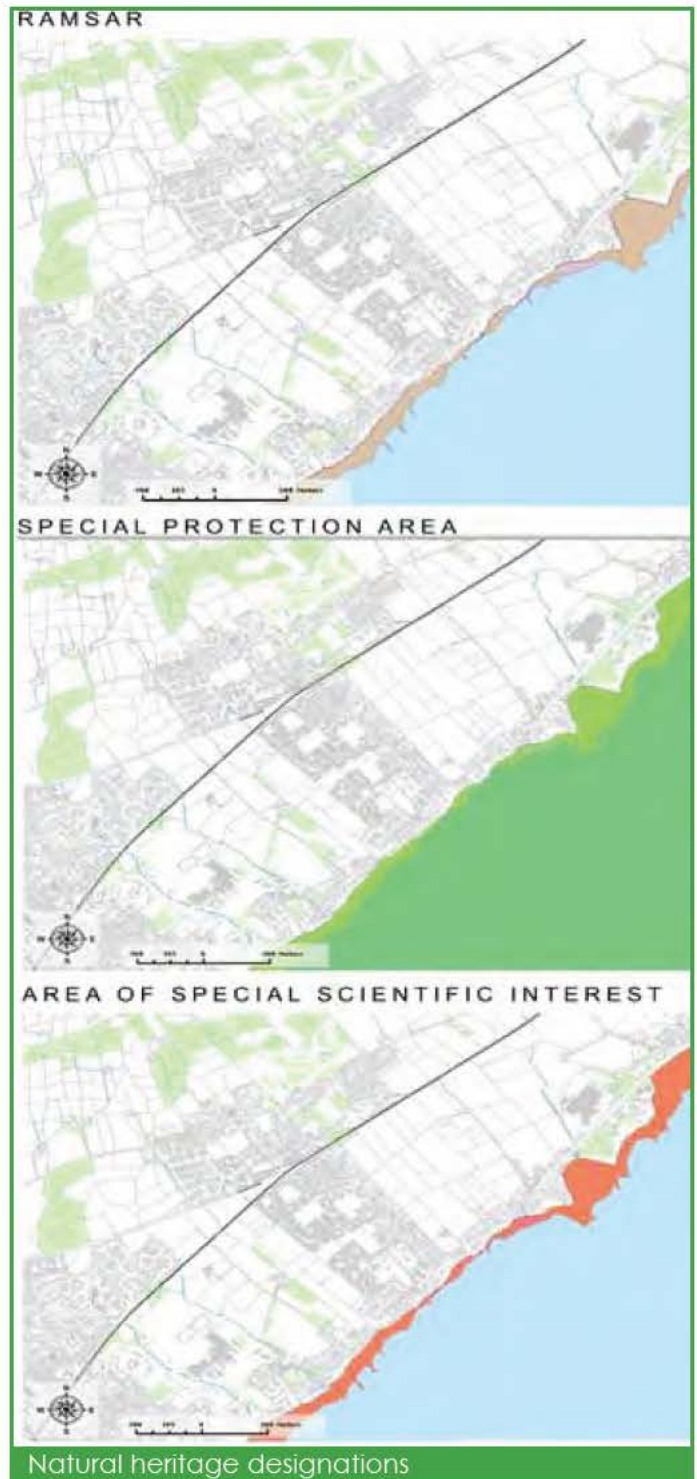
- The majority of the approvals are for residential developments consisting of detached and semi-detached dwellings and apartment buildings.
- Most of the approvals are within sites that were zoned for residential use within the area plan.
- Other major approvals of note are at Greenisland FC where a new 3G facility has been approved and an application by the Baptist Church to construct a new place of worship at Glassillan.
- There is a lack of commercial or retail development activity over the past 10 years. This is reflective of the primary residential function of the settlement.



3.4 Built and Natural Heritage

A detailed analysis of the built and natural heritage assets has been undertaken (Appendix D). There are a range of assets: listed buildings, scheduled monuments, historic parks, RAMSAR, SPA and ASSI designations - see compendium of appendices. The following observations can be made:

- Taking the historical context of Greenisland into consideration, it is a relatively new settlement. This is reflected in the low levels of listed structures within the settlement boundary. Most of the listed buildings of significance are located on the Shore Road and were developed as houses for rich merchants from Belfast during the industrial revolution e.g. Seapark House and Ballynascreen House.
- The area surrounding Greenisland has a rich heritage of scheduled structures. Many of these date from the early Christian period through to medieval defensive fortifications.
- There is an opportunity to make more of the heritage assets of the settlement.



3.5 Community Infrastructure and Facilities Audit

A key element of the baseline survey of the Greenisland Development Framework involved a review of existing facilities, building upon the area profile.

Community Asset	Services and Activities Offered
Greenisland Football Club – Clubhouse, football pitches, astro pitch, changing room	Football coaching for children (6-16), Senior football - 2 teams for over 18s, Gym classes, Community fun days, Karate classes, Computer courses, Digital camera classes
Existing public right of ways	Walks, Method of keeping fit and socialising
Greenisland Golf Club – Golf course, bar, restaurant	Golfing for members only, Cheap membership for children
Greenisland Community Centre	Irish Dancing lessons and competitions, Office for community worker, Host Baptist Church events
Greenisland Youth Centre	Youth facilities
Jubilee Hall – Main hall, committee room	Arts and crafts workshops, Pride of Greenisland Flute Band, Pensioners dinners and group, Orange Lodge, Birthday parties and other local bookings, Training and fun days
Church of Ireland – Church, parish centre and car park	African Child Ministries stall, Sunday worship, Choir and worship groups, Youth groups, Sewing group, Childrens ministries, Toddlers group
Greenisland Baptist Church – Church building, Glassillan Green	Mango Tree Coffee Shop on a Saturday, Mothers and toddlers on Friday, Hosts the citizens advice bureau, Christians against poverty food bank, Kids clubs, Elderly persons ministry
St Coleman's Catholic Church Greenisland – Church building, hall and car park	Badminton club and parish related activities
Greenisland Methodist Church – Multi-purpose church complex for worship and activities	Community activities for all ages, Lunch club, Bowling club, Recreation club
Church of the Nazarene	Church Hall - Scouts
Greenisland Presbyterian Church	Variety of programmes and outreach activities
Greenisland War Memorial Sports Club	Various sports and social facilities
Greenisland Primary School	Educational provision
Silverstream Primary School	Educational provision
The Old School Surgery	Medical facilities
Medicare Pharmacy	Medical facilities
Greenisland Dental Practice	Medical facilities
Greenisland Working Men's Club	Social facility

3.6 Conclusion

The above table demonstrates that Greenisland is a well-served community in regard to the number of facilities given its pro rata population. From our surveys it has become apparent however that interaction and communication between the various groups and associations could be greatly enhanced. It is recommended that a community initiative of sharing information should be explored. This is reflected in the proposals section.

3.7 Property Assessments

3.7.1 Opportunities for Growth in the Residential Sector

The recession and consequent collapse of the housing market across Northern Ireland effectively led to the mothballing of the majority of residential developments, and it was only very recently that we began to see the beginnings of a recovery to the extent that the construction of new schemes once again became economically viable and could go ahead (e.g. The Cairn).

There is no doubt that there is pent up demand in the residential market, particularly for starter homes and properties at the lower end of the price scale, and this appears to be starting to wash through into middle market residential as well. The completion of the A2 Shore Road Project in summer 2015 will greatly improve the accessibility of Greenisland as a commuter village.

New roundabouts off the widened dual-carriageway at both Shorelands and Station Road will present an opportunity to join up the western and eastern sides of the settlement, with the largest residential opportunity site within the study area, which runs from Shorelands up to the southern boundary of the football pitches, potentially being brought into play.

A further site zoned for housing and accessed from Bates Park should become viable as a natural extension to the existing fairly modern development.

The site adjacent to the doctor's surgery might be a more desirable location for elderly or sheltered housing development long term. In Upper Greenisland the most recent development, The Cairn, which is partly completed and occupied and partly still under construction, is testament to the recent improvement in the residential market. The configuration of this development appears to leave access to a further large zoned housing site, and it would seem reasonable to expect that development will spread naturally into this adjacent land.

A further extensive area of zoned residential land at Gorman Close remains undeveloped, however the existing road access to this part of the settlement from the Upper Road is poor, and one might assume that substantial road improvements may be required before this site could be developed.

Any settlement needs the ability to grow and the longer term needs of Greenisland will require more detailed analysis when the new statutory area and community plans are being prepared.

3.7.2 Opportunities for Growth in the Commercial Sector

Greenisland does not compete with its neighbouring towns in attracting mainstream retail outlets, and it would be unrealistic to suggest that it ever will. However, given the

particularly modest level of current commercial activity in the settlement, we would consider that some increase, particularly in the retail offer, may be seen as desirable. Whether any further retail development would be economically sustainable is another matter. The Net Annual Values of the limited number of retail outlets in Greenisland published on the LPS database range from c.£3,000 to c.£6,500 pa. These rateable value figures suggest that rental values in the area are almost certainly low, and most likely below the threshold that would make new development commercially viable at present. Enhanced subsidy may be required.

Consideration might be given to encouraging an increase in the café / coffee shop / restaurant provision and possibly further convenience or small speciality retail, however in view of the strength of offer in the neighbouring towns, it is difficult to see anything other than very modest expansion being sustainable. The potential for developing the large site between Shorelands and the football club, which is currently zoned for housing, could present an opportunity for additional retail provision in addition to new residential development if the zoning were to be reviewed long term. An increase in population through further residential development will of course assist in the viability of further commercial provision.

It is difficult to see where any expansion of commercial activity could be accommodated in the Upper Greenisland area. With the possible exception of a zoned

housing site adjacent to Berkeley Deane, there are no opportunity sites within this part of the study area which would appear suitable for commercial use (further review). The focus therefore, it is suggested, should be at Glassillan Green to supplement the existing retail/ commercial offer present and to provide employment opportunities in the longer term.

3.8 Transport Assessment



- The construction of the upgraded A2 Shore Road will improve traffic progression along this important link, as well as improving pedestrian and cycling facilities.
- However, the sub-standard alignment of Station Road, where it passes under the railway bridge, together with the lack of a footway or cycling facilities at this location, has the effect of severing Greenisland into two parts.
- Public transport facilities are generally considered good. However, the lack of penetration of the existing social housing developments accessed off Station Road is a disincentive to the use of public transport.
- The lack of cycling facilities along Upper Road is also a concern and a disincentive to the use of cycling as a mode of transport.
- The proposals in regard to opening up the disused railway line, enhancing facilities around the station and upgrading the Station Road itself will provide a quality environment and improve accessibility to public transport.

4. Consultation

4.1 Methodology

Consultation has been the cornerstone of the Greenisland Development Framework. The consultant team has communicated with as many local stakeholders and members of the public as possible within the project timescale. This process was invaluable for two reasons. Firstly, it enabled the team to establish an open and honest understanding of what Greenisland has to offer and what Greenisland needs to function better as a place to live and visit. Secondly, it assisted in developing a shared vision and concept for Greenisland. This ensured that any projects or proposals emanated from within the community and therefore were positively received once incorporated into the Development Framework.

A stakeholder engagement strategy document was prepared to manage and record the consultation process with interested groups and individuals. A final version of this document is included in the compendium of appendices. It records all the consultation details from each engagement.

A broad spectrum of consultation methods were engaged and ranged from:

- Site walkabout – June 2014

- Project steering group meetings (4 in total)
- Client meetings (5 in total)
- Individual meetings with key stakeholders (approx. 40 meetings)
- Householder telephone surveys (sample of 200)
- Opinion surveys administered through 5 local churches (36 written responses)
- Workshops held with various sectors within Greenisland e.g. sports organisations, community organisations, churches (3 in total)
- Open house launch event, 3rd October 2014 (approx. 50 attendants)
- Public consultation for 12 weeks (46 written responses).

Consultation should continue to provide the basis on which the Development Framework will be implemented as the new council arrangements come in place in April 2015. The draft proposals were displayed at a number of venues in Greenisland from 3rd October 2014 for a 12 week period up to Christmas 2014. There was a formal launch to the consultation process and every household within Greenisland was invited to attend a Public Open House Event on 3rd October. There was opportunity to engage over the 12 weeks the proposal boards were on display. The draft Public Consultation leaflet is also included within the compendium of appendices.

Final council presentations took place on 19th January and 2nd February 2015 and received full support for the recommendations.

4.2 Who was Consulted

The following groups and organisations were consulted. A comprehensive record can be found in the final Stakeholder Engagement Strategy.

Government Bodies

Organisation	
Elected representatives from CBC	
CBC officers and Chief Executive	
Department for Social Development	
Transport NI	
Northern Ireland Housing Executive	
North Eastern Education and Library Board	
Libraries NI	
Planning NI	
Northern Ireland Environment Agency	
Translink	
PSNI	
University of Ulster	

In addition to the statutory stakeholders, detailed discussions took place with the following groups:

Health and Education

Organisation
University of Ulster
Greenisland Primary School
Silverstream Primary and Nursery School
Rocking Horse Nursery and Play Station
After School Club
Alphabet Nursery
Old School Surgery

Local Businesses

Organisation
Knockagh Lodge
Glassillan Green (Mace)
Greenisland Shop
Russell's Shop 4 U

Churches

Organisation
Church of the Holy Name
Ebenezer Church of the Nazarene
Greenisland Baptist Church
Greenisland Methodist Church
Greenisland Presbyterian Church
St. Colman's Catholic Church

Charities/Community

Organisation
Carrickfergus Community Forum
Sustrans
Greenisland Youth Centre
Greenisland Environment and Heritage Group
GRASP Changing Tracks
Greenisland Community Council
Greenisland Community Association
Greenisland Community Centre

Sports Clubs and Societies

Organisation
Greenisland Golf Club
Greenisland Bowling Club
War Memorial Sports Club
Greenisland Ladies Hockey Club
Greenisland Boys FC
Knockagh Wrestling Club
Knockagh School of Dance
Pride of Greenisland Flute Band
Greenisland Working Men's Club

4.3 Results of the Public Consultation Survey – Exhibition

The formal exhibition was one element of the overall engagement strategy and an important one. The results received were generally positive in response to the proposals presented which demonstrated that the degree of pre-engagement and planning prior to developing options was invaluable. From the very extensive list of individuals and groups consulted the following key points can be stated:

- 46 members of the public contributed to the process
- Respondents were asked if they were in agreement with the shared vision statement for Greenisland: "By 2030, Greenisland will have become a fully integrated community which has retained its own sense of character and identity. There will be a strong community network of activities and services that are based around the new civic, commercial and community hub. The hub will be supported by the improved walking, cycling and vehicular connections throughout Greenisland and its neighbouring settlements. Greenisland will have taken advantage of its surrounding natural assets to attract more visitors through the implementation of a first class network of parks, recreation and sporting and wellbeing facilities."
- 71% of respondents either fully or partially agreed with the

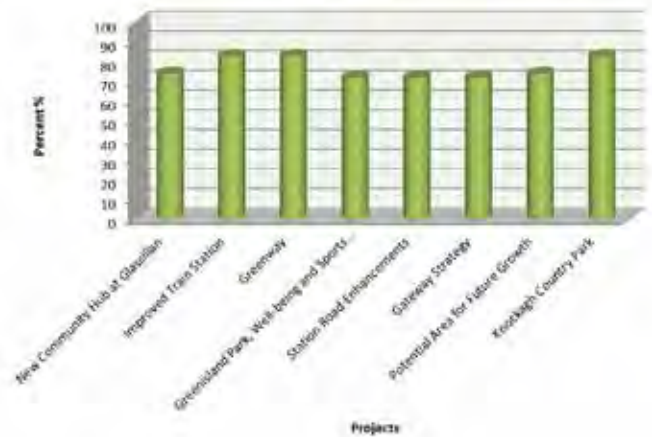


Community Workshop - August 2014

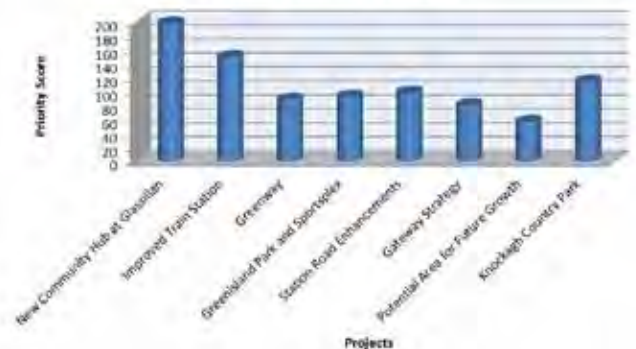
statement.

- All of the proposals presented received at least a 70% "like" rate from the public
- The most "liked" projects were the Greenisland Train Station Improvements (83% liked), The Greenway (83% liked) and Knockagh Country Park (83% liked).
- None of the proposals were disliked by more than 10% of the respondents. This fact in combination with the high rate of "liked" projects demonstrates that the proposals presented were broadly accepted by the public respondents.
- Respondents were asked to prioritise each scheme in terms of its importance to regenerating Greenisland. The projects deemed highest priority by respondents are the Hub at Glassillan (1st), Environmental Improvements to the Train Station (2nd) and Knockagh Country Park (3rd).
- The proposal deemed to be of least priority was the Potential Area for Future Growth.

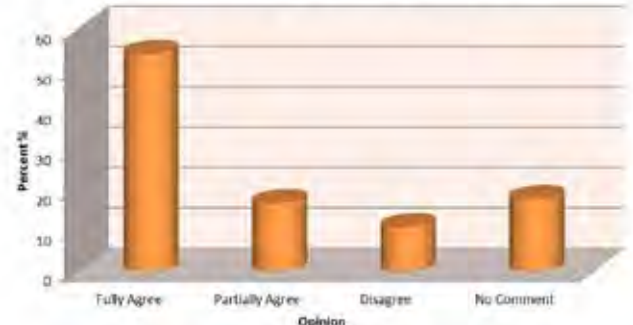
Percentage of Respondants who Like the Proposals



Project Priority Ranking



Public Opinion of the Vision Statement

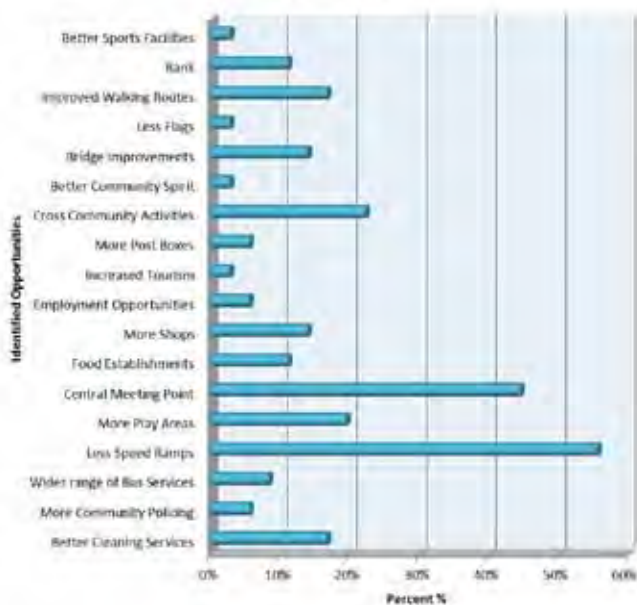


4.4 Results of the Churches Survey

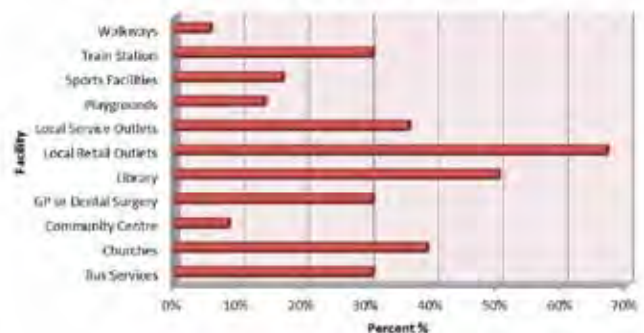
The Churches in Greenisland during the consultation workshop kindly volunteered to contribute further to the project by circulating an opinion survey throughout their Parishes on behalf of the consultant team. The objective of the Churches' survey was to gain an understanding of what facilities are currently well used in Greenisland and what opportunities there were for potential improvements. The key points from the Churches' survey are as follows:

- A total of 36 members from local churches responded. The churches who kindly took part in the survey were: Greenisland Baptist Church, Greenisland Presbyterian Church, St. Colman's Roman Catholic Church, Greenisland Church of the Holy Name Church of Ireland and Greenisland Methodist Church.
- The most commonly used facilities were the Local Retail Outlets (67%), Greenisland Library (50%) and Local Churches (39%).
- Some existing Carrickfergus Borough Council facilities were infrequently used such as Walkways/Right of Ways (6%), Greenisland Community Centre (8%) and Playgrounds (14%).
- Respondents were asked in an open ended fashion what opportunities they believe there are to improve Greenisland. The most commonly identified opportunities were less speed ramps along Station Road and the Estate (56%), a central meeting point or hub (44%) and more cross community activities (22%).

What opportunities are there to improve Greenisland?



What facilities do you use in Greenisland?



4.5 Results of the Householder Telephone Survey

The telephone interview survey by NEMS Market Research covered a randomly selected sample of 200 households in Greenisland, using a structured questionnaire seeking the public's views on a range of community issues in the settlement. The survey was conducted in August 2014. The survey also sought to reveal any differences in the perceptions between residents north and south of the railway line which runs through Greenisland. Thus, the sample was split into quotas of 63 interviews north of the railway line (31%) and 137 interviews south of the railway line (69%), in proportion to the number of residential addresses. The key points are below:

- Despite the perceptions, the majority of housing south of the railway line is privately owned.
- North of the railway, most people make the commute to

Belfast whereas south of the railway people are likely to work locally e.g. Carrickfergus, Newtownabbey.

- The most commonly used facility in Greenisland was the library and this was widely used by people from north and south of the railway. This is highly significant in regard to drawing people into the Estate from all over Greenisland.
- A stark statistic was that on average 50% of respondents did not use any community facilities in Greenisland.

4.6 Summary

A summary of the consultation process is recorded in the separate appendices document. The proposals that form the basis of the action plan all stem from our public engagement and stakeholder consultation. This is very much a plan from the people.

From the varied methods of consultation used a significant range of comments were made and summarised in the strengths, weaknesses, opportunities and threats analysis, outlined in the following pages.

Following the detailed analysis and consultation we have identified two hubs within the settlement. The primary hub is the area around Glassillan Green (defined in section 6.2). The secondary hub is the area around Greenisland Train Station (defined in section 6.3).

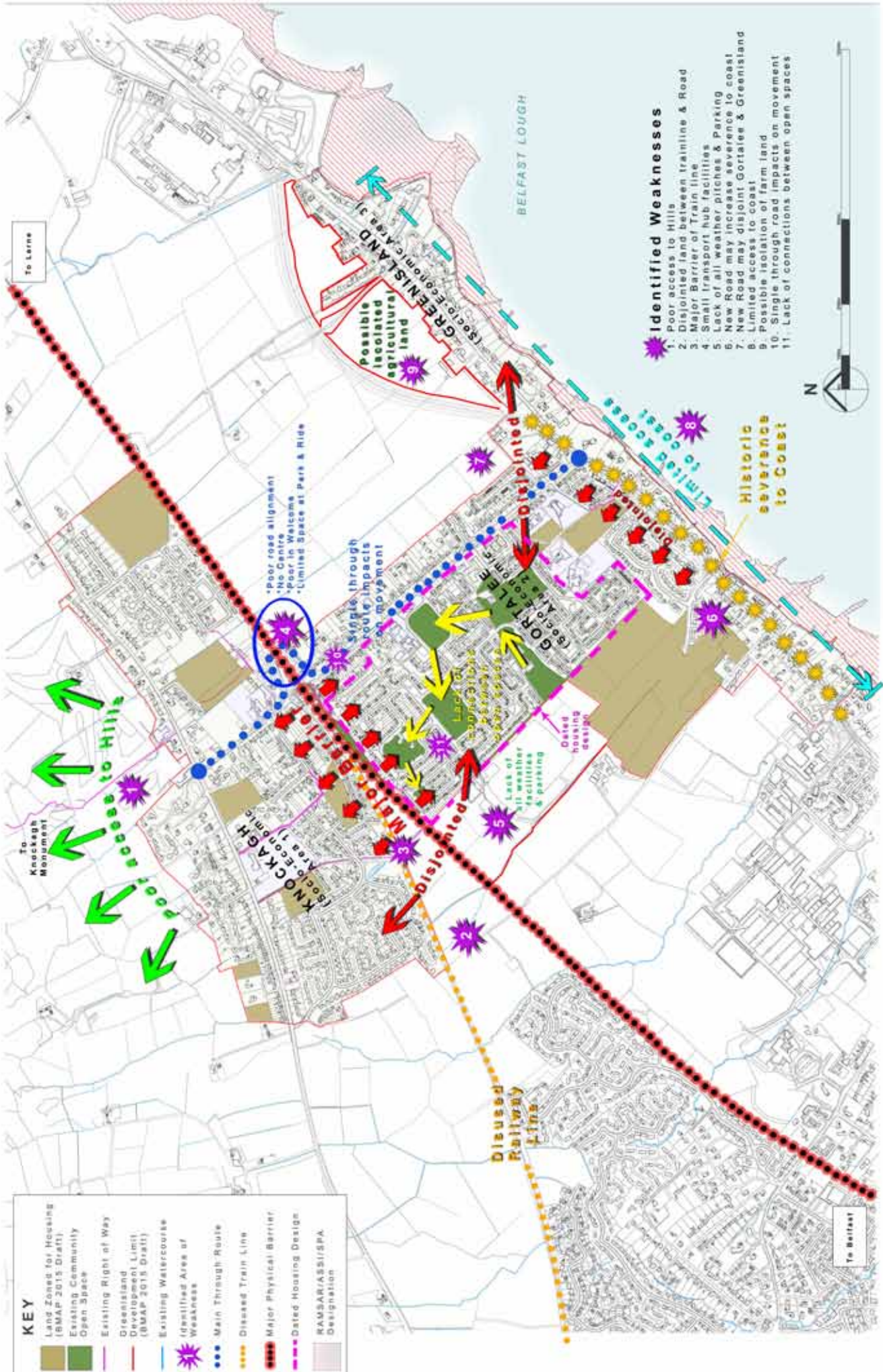


Community Workshop - August 2014

Strengths



Weaknesses



KEY

- Area Zoned for Housing (BMAP 2015 Draft)
- Existing Community Open Space
- Existing Right of Way
- Greenland Development Limit (BMAP 2015 Draft)
- Existing Watercourse
- Area identified as an opportunity
- Potential Community Greenway (Cycling & walking)
- Potential New Community Outdoor Recreation Space
- Potential Coastal Path
- Potential foot bridge link
- Existing RAMSAR/ASS/SPA Designations
- Pedestrian Crossing point (as per new road layout)

Identified Opportunities

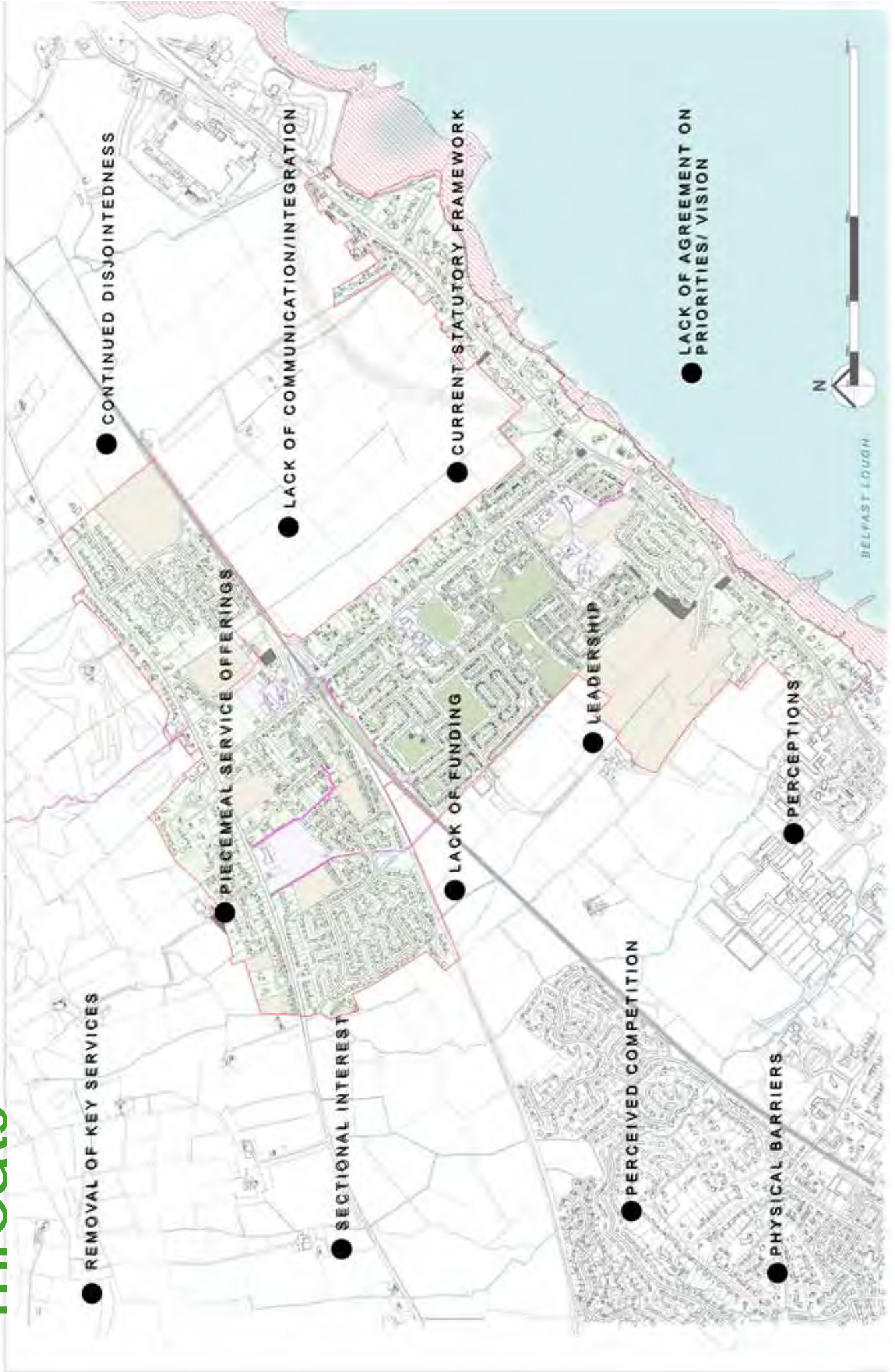
1. Connecting Pedestrian Foot Bridge over Tracks
2. Hub for Sports & Recreation
3. Improved Transport Gateway
4. Potential Community Greenway (cycle/walk path)
5. Connection Between Existing Open Spaces
6. Rambler Pathway to Knockagh Monument
7. Improved Pedestrian & Cycle Coastal Path
8. Community Outdoor Recreation Park
9. New Heart Centre/Community Hub
10. Townscape Character Improvement Scheme

Map Labels:

- To Larne
- To Knockagh Monument
- Knockagh Monument Walk
- Improved park & ride facilities connection to Greenway
- New Community Hub
- Consolidated Community Open Space
- Potential Growth
- Links to Coast
- Links to University
- High Sports Facility
- Residential Green
- Potential Growth
- Sport Hub & recreation
- Walking Routes
- All Weather Pitches
- POTENTIAL COMMUNITY GREENWAY (CYCLING/WALK)
- To Newswater
- To Belfast
- BELFAST LOUGH
- Knockagh Coastal Pathway
- Station
- Station
- Station

Threats

MEA-DPS-073



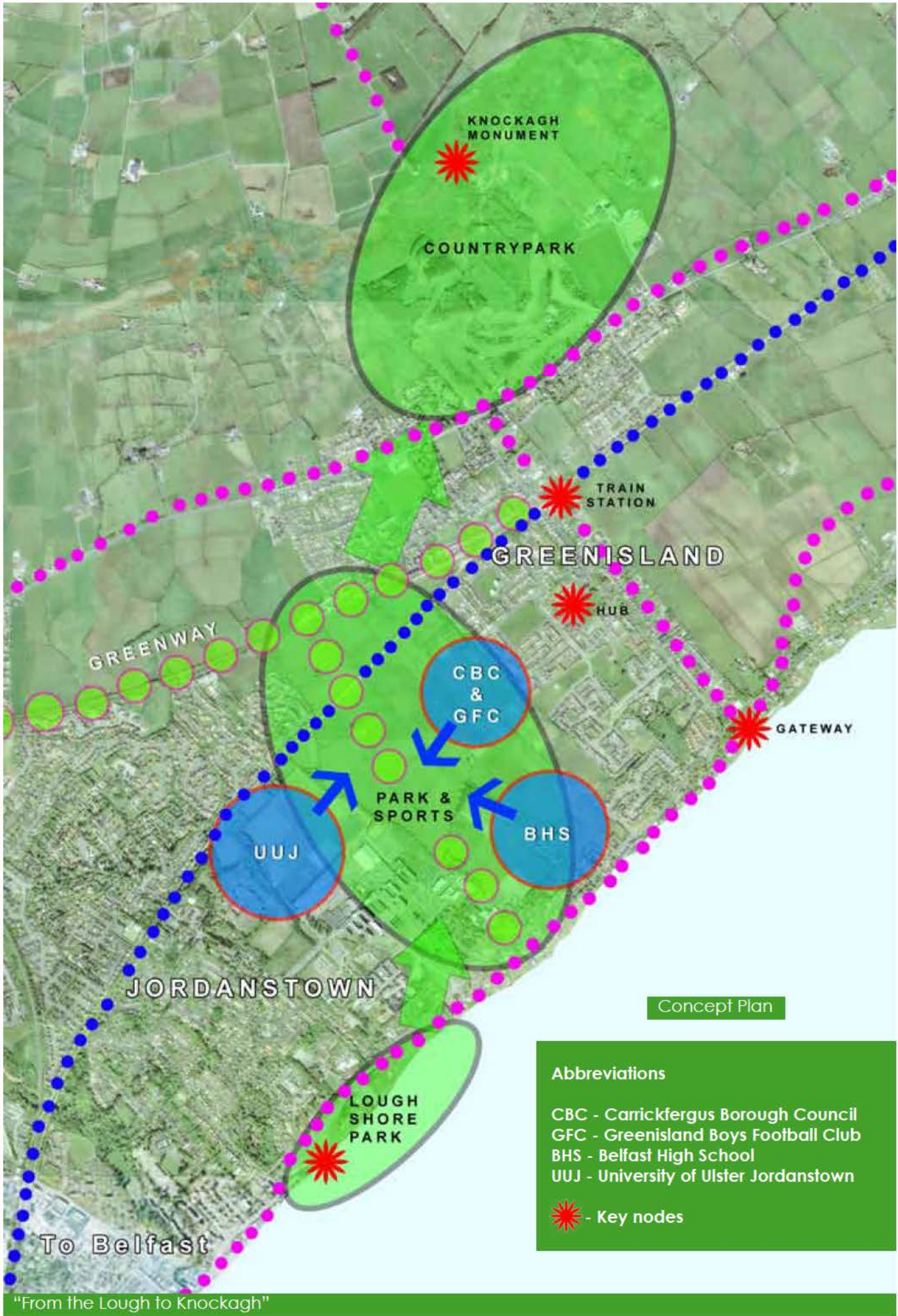
5. Visioning & Objectives

5.1 The Concept

The concept plan for Greenisland is the primary step in achieving the goals of the Development Framework by establishing broad brush themes which individual projects can deliver to fulfil the over arching masterplan.

The key theme is “From the Lough to Knockagh”. This denotes the process of drawing people from the shores of Belfast Lough into Greenisland and providing the residents of Greenisland the opportunity to better connect and interact from “The Lough to Knockagh”, through a network of open spaces, recreational areas, pathways and bridges. Presently, thousands of people travel past Greenisland on a daily basis without the need to visit. Indeed many local people do not avail of the existing natural assets of the area. The concept aims to address this dual problem.





5.2 Vision

The vision was developed through the consultation stage of the project and agreed with the Steering Group.

“By 2030, Greenisland will have become a fully integrated community which has retained its own sense of character and identity. There will be a strong community network of activities and services that are based around the a new civic, commercial and community hub. This hub will be supported by the improved walking, cycling and vehicular connections throughout Greenisland and its neighbouring settlements. Greenisland will have taken advantage of its surrounding natural assets to attract more visitors through the implementation of a first class network of parks, recreation, sporting and wellbeing facilities.”

5.3 Regeneration Objectives

In order to achieve the vision it is important to set out the core objectives which can act as targets to measure success over the next 15 years. The core regeneration objectives which were agreed and identified through consultation are highlighted below and form the foundations of the development framework:

Regeneration Objectives	
A	To improve the physical and social connection within Greenisland and also to its neighbouring settlements
B	The creation of a civic, commercial and community hub that is welcoming and accessible to the entire population of Greenisland
C	Continual improvement of Greenisland as a centre of sport & outdoor recreation excellence and as a focus for recreation and leisure well-being for the wider region
D	Fully utilise and exploit the existing physical assets that Greenisland has in abundance (Belfast Lough, Knockagh Escarpment and the surrounding areas of natural green space).

6. Proposals

6.1 Overview of the Plan

The development framework proposals were established through detailed analysis of the settlement, comprehensive stakeholder engagement and consultation in agreement with the project steering group.

The projects and proposals aim to be realistic and deliverable in the current economic climate without sacrificing the aspirations of the development framework. Regeneration of the key sites in Greenisland shall hopefully be the kick start of further private investments into the area.

Implementation of the projects will seek to realise the agreed vision and concept for Greenisland.




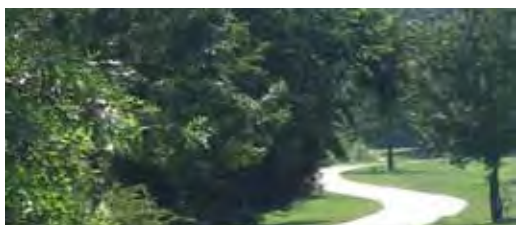




Each of the 8 key projects will be explained in the remainder of this chapter through text, plans and indicative images. Each project contains separate individual components which are detailed in the action plan along with indicative costs, priority status and phasing. The plan overleaf shows the 8 key projects in their geographical context which ties back to the concept plan.



Artist's Impression of the Greenway



The Development Framework Plan for Greenisland - 8 Key Projects

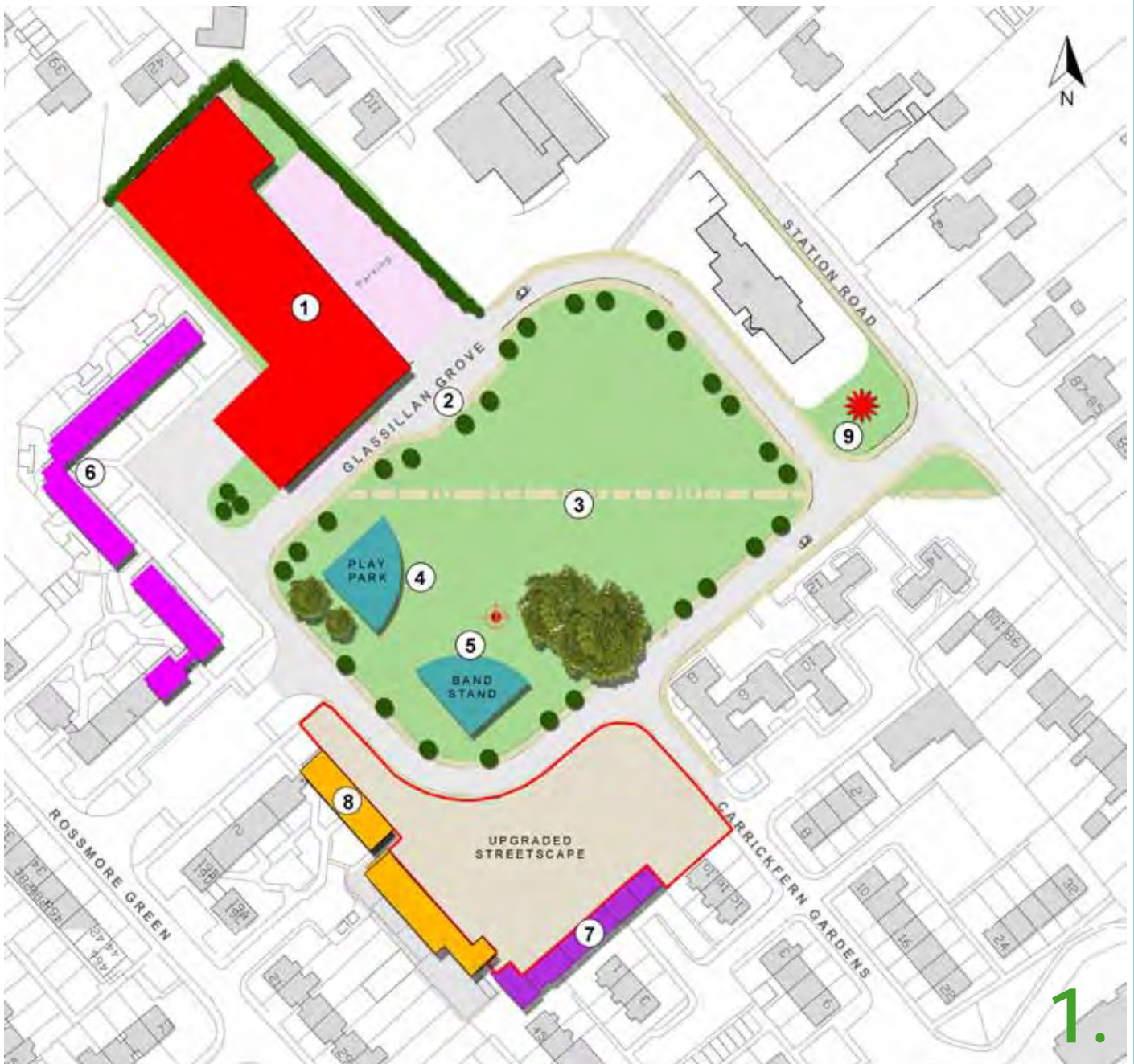
Key		
1	Community Hub - Glassillan <ul style="list-style-type: none"> New Community Centre and civic building Environmental improvements to the Green Shop frontage improvement scheme Residential improvement scheme New commercial/retail space 	
2	Improved layout of Train Station Access <ul style="list-style-type: none"> New mixed use station/commercial building Widened tunnel and new plazas Linkage to Greenway and cycling facilities Potential improvements to station parking facilities 	
3	Greenway <ul style="list-style-type: none"> Development of the disused railway for use as a car free cycling and walking route linking Greenisland with Monkstown 	
4	Greenisland Park and Sportsplex <ul style="list-style-type: none"> New shared sporting facilities - 3G pitch Natural landscaped parkland Rationalised allotment area New pedestrian/cycle footbridge to connect with the Greenway 	
5	Station Road Upgrades <ul style="list-style-type: none"> Public realm upgrades along the length of Station Road To connect to the improved Train Station area 	
6	Gateway Strategy <ul style="list-style-type: none"> Use of artwork as part of a wider branding strategy for Greenisland Installations proposed for Shore Road, Upper Road and the Train Station 	
7	Knockagh Viewpoint and Country Park <ul style="list-style-type: none"> Full access to a new viewpoint at Knockagh Monument Wide range of recreational facilities New parking and visitor facilities 	
8	Potential area for Future Growth <ul style="list-style-type: none"> Long term reserve of land for use as required 	

6.2 The Community Hub – Glassillan Green (1)

The existing facilities of Glassillan Grove are in fairly good condition with the positive benefit of having a potentially beautiful green complete with mature trees as an existing asset that can be upgraded. By utilising the strong open space and strengthening the sense of enclosure and by regenerating the surrounding buildings in the area, we are creating a new and vibrant heart for Greenisland.

The artist's impression below shows a potential image of how the proposals may look - subject to ownership and funding agreements.

- Community Hub - regenerated Glassillan Grove central green and surrounding buildings. The Hub will include the following components:
- A new community and civic building incorporating a range of uses such as the Library, Youth Centre, Baptist Church and Community Centre etc.
- An environmental enhancement scheme on the central green including a new state of the art Childrens' Play facility , a bandstand and multi-functional space for community events and festivals and a re-instatement of an historic pathway
- A shop improvement scheme to enhance the existing row of shops and provide for a superior retail experience
- Provision of new retail and commercial space including start up units providing for employment opportunities
- Upgrading of residential properties overlooking the green
- Improved access from Station Road and associated entrance feature providing stronger visibility of the green and new Hub
- New bus stop on northern edge of open green opposite the new Community and Civic building.



Concept Plan for the Hub at Glassillan

1.

KEY

- ① New Community Building - Mixed use - Youth Centre, Library, Meeting Rooms Baptist Church, Well being Service,
- ② Bus Stop/ Drop off - Pick up Point
- ③ Historical pathway
- ④ Play Facility
- ⑤ Band Stand and Festival Space
- ⑥ Refurbished Residential/Re-Imaging Scheme
- ⑦ Shop Frontage Improvement Scheme - Refurbished commercial units
- ⑧ New Commercial/Retail Units and upgraded
- ⑨ New Entrance/ Gateway Feature - widened access

- Proposed Grass Area
- Paving Scheme/ Footpath Improvement
- New Community Building
- Refurbished Commercial Unit
- New Commercial / Retail Units
- Refurbished residential/ Re-Imaging Scheme
- Gateway Feature
- Existing Tree
- Proposed Tree
- Paved Parking Space
- Existing Building
- Location of Artist's Impression Image



Artist's Impression of the Hub and Green - revitalised Glassillan Green and the Hub in the background.



Precedent Images of Environmental Improvement schemes - Suitable for Glassillan Green.



Precedent Images of Community Hub Buildings - Newlands Community Centre (Top), Gorebridge Community Hub, Gorebridge, Scotland (Bottom)

6.3 Improvements to Greenisland Train Station and adjacent Commercial Node (2)

Upgraded Train Station and provision of new Plaza - new station building incorporating commercial units, widened pedestrian tunnel with feature lighting and entrance plaza at lower level, commercial building and associated parking together with linkage to new Greenway at upper level.

Proposed environmental improvements at the Train Station are intended to improve the connectivity of Greenisland that has been separated due to safety

improvements to the railway lines over time.

Improving access across the railway line is a priority. The Train Station was traditionally the historical centre of Greenisland and is the key area for connection to Belfast and Carrickfergus. It currently bisects the settlement.



Precedent Images for the Commercial Plaza Area



Precedent Images for the Lighting Strategy



Precedent Images for the Commercial Plaza Area



Precedent Images for the Lighting Strategy



2.

Concept Plan for Greenisland Train Station and the Local Environment

Key

- ① New Station Building - Mixed use - Cafe/Restaurant/Shop
- ② Bus Stop/ Drop off - Pick up Point
- ③ Mixed use commercial units
- ④ Multi-storey car parking
- ⑤ New upgraded tunnel with feature lighting
- ⑥ New Station entrance layout
- ⑦ Bicycle Park
- ⑧ Sculptural focal point
- ⑨ Plaza / Outdoor seating area at lower level
- ⑩ Greenway connection/ cyclepath
- ⑪ Townscape Character Improvements to Station Road

- Paving Scheme/ Footpath Improvement
- New Building (as noted)
- Existing building
- Proposed Tree
- Proposed greenway connecting cycle route
- Pedestrian access to cinder path
- Proposed sculptural focal point
- Road surface
- Existing grass embankment

6.4 Greenisland – Monkstown Greenway (3)

The proposal consists of the development of the disused railway line for a combined pedestrian and cycling path. Access shall be gained directly from the train station along the new Greenway to Monkstown and Newtownabbey.

A Greenway linking to Newtownabbey via the disused railway line is proposed to allow users to connect with the station. A plaza, commercial centre and improved access to the station will help create a welcoming environment. The reuse of the line however must be achieved without prejudice to the long term aspiration of Translink to re-instate the rail line if ever needed. Options should be examined that allow for such. Images sourced from nigreenways.com.



The proposed route of the Greenway from Greenisland to Monkstown



Precedent Images of the Greenway



Artists Impression of the Greenway

6.5 Greenisland Sportsplex and Parkland (4)

Building on the existing playing pitches and providing a new synthetic 3G pitch together with circuit walks linking into a newly created wider recreational wellbeing zone is the core of the proposed Sportsplex and associated parkland. A new pedestrian footbridge to the north over the existing rail line and linkage to the allotments area to the south providing connection through to the UUJ and Belfast High School sporting facilities through a formalised park area is a key component. A new network of pathways to be developed throughout the entire area linking the Shore to the Knockagh Monument.

Connectivity north and south linking the shore to Knockagh and east and west from Greenisland to the University of Ulster Jordanstown lands is equally important.

The Greenisland Sportsplex could be a perfect example of how joined up thinking and co-ordination could potentially result in the development of a top class facility for all parties involved. This facility could also act as a bridge between the proposed residential development at the UU and the proposed Hub development at Glassillan. The increase in footfall would help to increase viability for commercial developments in Glassillan.



Precedent Images of the Sportsplex Facility



Precedent Image of 3rd Generation Pitch



Precedent Image of Cycle/Pedestrian Bridge

6.6 Station Road Enhancements (5)

Implementation of a public realm and streetscape enhancement scheme along the entire length of Station Road, the main spine of Greenisland. Station Road has the opportunity to provide a landscape amenity spine to the entire settlement.

This scheme may include the following components:

- Resurfacing pavements
- Rationalised traffic management schemes
- Tree planting
- Street furniture suite
- Feature artwork
- Resurfacing the road
- Cycling route upgrade
- Improved crossing points



Precedent Images of Potential Public Realm Enhancements to Station Road

6.7 Gateway Strategy (6)

Gateway features will be located at Shore Road, Upper Road and the Train station providing identity and legibility to the area. Use of art and sculpture as part of wider signage strategy will help in identifying Greenisland as its own identity.

Greenisland Roundabout Strategy Proposals

- Demarkates arrival in Greenisland for visitors
- Defines Greenisland's boundary therefore separates Greenisland as a specific and individual place in it's own right
- Provides notification to motorists, pedestrians and cyclists that they are at an access point to Greenisland
- Provides a stylish, welcoming and high quality entrance and first impression
- Provides a contemporary journey to Knockagh Monument and other tourist activity
- Provides an improved aesthetic along the Causeway Coastal Route
- Acknowledges Greenisland's unique historic and cultural heritage



Gateway Strategy for Greenisland



6.8 Knockagh Country Park (7)

Utilising the stunning views over Belfast Lough, access path up to the monument and provision for wide range of recreational activities including pony trekking, rambling, bike trail and linkage to tourism potential of Greenisland Golf Club and Equestrian Centre. Knockagh Country Park may consist as the following components: The first step is to create a visitors parking area and formalised route for visitors to access the Knockagh Monument from a designated point in Greenisland. Once this has been established it may be possible to create a network of walking routes and trails through the Knockagh Escarpment. This could consist of a range of walking, mountain biking and horse trekking routes.



Precedent Images of Potential Activities within the Country Park

6.9 Area of Potential Future Growth

Lands set aside for future growth south of the newly created Shore Road infrastructure. This shall allow for enhanced growth but should be subject to the normal scrutiny of an area plan and community planning process.

7. Action Plan*

MEA-DPS-073

Projects are hoped to commence within the timeframe

		Proposal	Description	Obj	Priority	Commencement	Cost
GLASSILLAN HUB	1a	Construction of a new mixed use community/civic building	The Hub building will serve as the youth and community centre, library, meeting space, Baptist Church and associated civic/community services	B	HIGH	0-5 YEARS	£8m
	1b	Environmental improvements to Glassillan Green	To include play park, band stand, upgraded paths, additional tree planting together with relocation of the bus stop and a new gateway entrance	C	MEDIUM	0-5 YEARS	£1.8m
	1c	Residential re-imaging scheme	Exterior rebranding of residential buildings	B	MEDIUM	0-5 YEARS	£1.3m
	1d	Shop frontage improvement scheme	Exterior rebranding of shops to include streetscape and parking upgrades	B	MEDIUM	0-5 YEARS	£1.3m <small>inc £105k shopfronts</small>
	1e	New commercial units	Conversion of some residential units to retail use subject to future demand and consultation	B	LOW	5-10 YEARS	£700k
TRAIN STATION IMPROVEMENTS	2a	Relocation of railway station building	Existing building to be relocated south of the line. Construction of new mixed use building to consist of a mix of station office, retailing and services such as a shop, a coffee shop or a small restaurant	A	HIGH	0-5 YEARS	£1.4m
	2b	Construction of new commercial units	Small retail/service node to replace and add to existing offering	A	MEDIUM	5-10 YEARS	£2m
	2c	Tunnel upgrade and park and ride extension	Widening of existing tunnel and improvements to include feature lighting. Extension of car park to include area of existing station building. Consideration to be given to multi-storey option	A	HIGH	0-5 YEARS	£900k
	2d	Reconfigured station entrances and access arrangements	Redesign of station entrances by high quality public realm design. Access and improvements to the cinder path and cycling provision	A	MEDIUM	0-5 YEARS	£400k
	2e	Creation of Station Plaza	Feature entrance to the station and tunnel	A	MEDIUM	0-5 YEARS	£500k
GREEN WAY	3a	Implementation of the "greenway" between Greenisland and Monkstown	The railway line between Greenisland and Monkstown is no longer in use. An innovative way of using this asset would be to construct a cycling and walking network between the two settlements (without prejudice to the line's possible future re-instatement).	A	HIGH	0-5 YEARS	£600k
SPORTS- PLEX	4a	Implementation of a shared Sportsplex and natural parkland within the landscape wedge between Greenisland and Jordans town	Construction of pathways and a new combined pedestrian/cycle bridge linking to the park	C	MEDIUM	10-15 YEARS	£650k
	4b	Cater for a 3G pitch at Greenisland Boys Football Club	Enhancement of existing facilities with provision of 3G facility for all-weather activities	C	HIGH	0-5 YEARS	£500k
	4c	Creation of new linkages and access points to the park for pedestrians and cyclists	New access arrangements to be identified and built with agreement of landowners and local communities	C	MEDIUM	0-5 YEARS	£200k
STATION ROAD	5a	Public realm / environmental improvement scheme	The entire length of Station Road should be improved aesthetically through high quality public realm treatments and tree planting. Consideration should be given to re-examining the traffic calming measures	A	HIGH	0-5 YEARS	£1.7m
GATEWAYS	6a	Roundabouts strategy	The A2 upgrade has provided an opportunity to provide artwork or sculptural pieces which could act as a gateway for Greenisland. There are 3no. roundabouts highlighted where this may become possible	A	LOW	5-10 YEARS	£1m
	6b	Greenway and Upper Road strategy	Artwork or sculptural pieces installed to denote the start of the greenway at the train station and at the Upper Road	A	LOW	5-10 YEARS	£150k
KNOCKAGH PARK	7a	Construction of visitor car parking off the Upper Road	Creation of a visitor car park which would act as a gateway to Knockagh Country Park and the viewpoint and walking routes	D	MEDIUM	0-5 YEARS	£250k
	7b	Restoration of the public right of ways	Improve the accessibility of the existing right of ways from Upper Road to Knockagh via the golf club	D	HIGH	0-5 YEARS	N/A
	7c	Installation of recreational trails	Various recreational trails can be created which would cater for walkers, horse trekking or biking	D	MEDIUM	5-10 YEARS	£150k
	7d	Creation of a viewpoint facility	From Knockagh Monument, provision should be made for a temporary café/information point	D	MEDIUM	5-10 YEARS	£160k
GROWTH AREA	8a	Lands dedicated for future growth	This land has been designated for future growth if an identifiable need arises in the long term. The A2 upgrade provides a natural boundary to the development site. This would be subject to due process	D	LOW	10-15 YEARS	N/A

* Subject to land ownership, funding, partnership agreements and appropriate phasing. Projects will start within the allocated priority timescales.

8. Delivery

8.1 Funding

The Development Framework sets out a comprehensive programme of proposals and enhancements that aim to regenerate Greenisland over the next 15 years. Funding from a variety of sources including public sector interventions and private sector investments are essential to deliver the high quality developments that will fulfil the Development Framework in its entirety.

Through the Development Framework and Action Plan, delivery agencies will have clearly identifiable steps on how Greenisland can be revitalised as a place to live and a more attractive place for private investors. This section highlights various funding streams considered at the time of publication of this report however the list is not exhaustive and further research will be essential to the delivery of any given project. Research has also been obtained from NI Government Funding Database (<https://govfundingpublic.nics.gov.uk>).

A number of the funding programmes are entering new phases and may have differing criteria in their updated formats.

8.1.1 Local Council Funding Opportunities

The new Council arrangements will

have their own budgets and priorities. Additional funding streams should be available from local councils once regeneration powers and budgets transfer to local councils in 2016. This funding stream may focus on the hub and train station enhancements with other proposals also benefitting depending on the categorisation of the project.

8.1.2 DARD Funding Opportunities

DARD Rural Development Programme

The last round of funding ran until the end of 2014. There is every indication it will reopen in Spring 2015. The grant provides funding for projects that focus on rural development. Certain projects listed on the action plan may benefit from this scheme due to being outside the settlement limits of Greenisland e.g. Knockagh Country Park or the Greenway. This source is likely to be most relevant to the Knockagh Park development.

8.1.3 DCAL Funding Opportunities

Sports NI / Libraries NI

The Active Clubs and Community Capital funds could contribute to shared sporting facilities such as the Greenisland Sportsplex however both schemes are currently closed for 2014, with no announcement on 2015 funding to date. The next round of funding needs to be investigated. The 3G pitch at the GBFC could also benefit from sports funding sources. Future grant from Libraries NI to be sought for the redevelopment of the library.

8.1.4 DETI Funding Opportunities

Northern Ireland Tourist Board

The Built Heritage Programme aims to provide capital assistance towards the development of visitor attractions in NI. The Tourism Development Scheme aims to provide financial assistance to improve visitor attractions in NI. There are a range of grant sizes available and it runs to 2015. Examples of schemes which may benefit from such funding are the Knockagh Country Park/Monument and the Greenway as well as place making and signage proposals for Greenisland in general.

8.1.5 DRD Funding Opportunities

Cycling Unit Funding

DRD Cycling Unit offers funding on a yearly basis to projects which encourage the use of cycling. The Greenway proposal is an obvious potential beneficiary of this scheme. Sustrans would be a key consultee in regard to other funding sources for the `Greenway`.

Translink

Translink operate the "Routes to Stations" scheme which also could benefit the Greenway proposals as it ties directly into Greenisland train station. The land is also owned by Translink who would benefit directly from interventions. Whilst there is no current programme identified for upgrading the station, future contributions should be examined from Translink.

8.1.6 DSD Funding Opportunities

DSD have various live schemes which could benefit programmes in Greenisland all of which have the remit of funding regeneration schemes which tackle community and social issues. Comprehensive Development funding may be available towards the design, implementation and maintenance of regeneration schemes. Given the delay in transferring powers to Councils there remains a central budget within DSD that could be examined for the `Hub` and Train Station nodes in particular.

Responsibility for operational delivery of local urban regeneration, tackling deprivation and community development will transfer from the Department for Social Development to the new councils in April 2016 and the relevant budgets are to be allocated and transferred to the new councils. Some financial assistance may be available from DSD up until the period of when the transfer of functions occurs. This will be particularly crucial in regard to establishing a number of quick wins.

8.1.7 Funding from other Government Departments

Unfortunately there are currently no applicable open schemes operated through the following government departments:

- Department of Education
- Department of Employment and Learning
- Department of Health, Social

Services and Public Safety

- Department of Environment
- Department of Justice
- Office of First Minister and Deputy First Minister

Funding streams from these departments may open in future and should be reconsidered prior to progression of any schemes.

8.1.8 Charitable and Voluntary Sector Funding Opportunities

Biffa Waste Tax

Biffa Award was established in 1997 under the Landfill Communities Fund and through the Fund they are able to support a wide range of community and environmental projects across the UK. Biffa Group Limited has supported this initiative by contributing over £150m since they were established, which to date has been used to help more than 3200 projects. Funding is available of between £10,000 and £50,000. This scheme may be relevant to the Knockagh Country Park or Greenway project.

Ulster Garden Villages

Ulster Garden Villages Limited was established under the Industrial and Provident Societies Acts (Northern Ireland) in 1946. In 1983 the Committee of Management of Ulster Garden Villages took the necessary steps to convert the Society into a charity and under its amended regulations empowered it to transfer from reserves to a common fund such amounts to be available for distribution for general charitable

purposes, as the Committee shall from time to time determine. Ulster Garden Villages generally fund projects which benefit the following areas: Health, disadvantaged sections of our society, young people, culture & heritage and environment. This scheme may be relevant to a number of the projects in Greenisland which can demonstrate conformance with the above criteria.

Woodland Trust

The Woodland Trust is in partnership with MOREwoods and the Forest Service to contribute towards landowners who wish to plant 5 hectares. This may be relevant in due course to the proposed parkland between Greenisland and Jordanstown.

Lottery

Small grants can be awarded through the Awards for All grants which may cover elements of schemes. The Space and Place scheme has future potential to provide funding for community spaces such as the Glassillan "Hub" if reallocated in future.

EU Peace IV

Significant funds will be available through the EU Peace IV fund administered by the Special EU Programmes Body. Consultation was held in 2014 to inform the content of the programmes from 2014-2020. Eligibility of the schemes should be assessed once the final programme is announced.

INTERREG IV

Significant funds will be available through the INTERREG programme administered by the Special EU Programmes Body. Consultation was held in 2014 to inform the content of the programmes from 2014-2020. Eligibility of the schemes should be assessed once the final programme is announced.

8.2 Phasing

Timescales for developing all aspects of the Development Framework will extend up to 15 years. Certain elements within the report will be suitable for short and medium term completion whereas others are longer term aspirations.

Phasing and prioritising of schemes needs to be examined on a scheme by scheme basis at the time of programming and by the appointed project partnership board. Factors which may influence phasing are:

- Funding
- Land availability
- Temporary arrangements if proposals are co-incident
- Parking, traffic and access
- Local support will be vital

It will be essential that the community see demonstrable change in the early stages even if those projects are limited in scale.

8.3 Potential Quick Wins

The following projects could begin work immediately once funding has been secured:

- Environmental improvements to Glassillan Green
- Shop front improvements at Glassillan
- 3G pitch at Council playing fields
- Tunnel upgrade and park and ride extension
- Implementation of the Greenway between Greenisland and Monkstown

8.4 Delivery Mechanisms

The impending RPA is the first major examination in decades of how public services in Northern Ireland will be organised and delivered. Under the reforms, Mid and East Antrim Council will become the statutory local authority responsible for the Greenisland area. The reforms will also transfer central government powers such as planning, economic development and urban regeneration. The new council will therefore have a greater ability to effect change in Greenisland through these additional powers and resources.

An advisory steering group or partnership board should be formed with the remit of delivering the Development Framework and Action Plan for Greenisland. The implementation group should have a clear governance structure. The steering group should consist of a similar mix of individuals as the incumbent group that have overseen the consultation and evolution of the Development Framework up to its draft final stage. Some elements of the Development Framework fall within the newly formed Antrim and

Newtownabbey Council area (west of Hartley Hall). Liaison between the two Councils is important to achieve delivery of some trans-boundary schemes.

This report recommends that the primary delivery agent and key driver for this plan shall be established under the new Mid and East Antrim Council. Carrickfergus Borough Council officials have sought the permission of the new Mid and East Antrim Council to establishing a Greenisland Regeneration steering group to drive forward the Development Framework.

8.4.1 Key Stakeholders

The following key stakeholders will have important roles in delivering the Development Framework:

Greenisland Project Delivery Team/ Steering Group

The team responsible for driving forward the Development Framework. Team composition is to be confirmed by the new council.

Mid and East Antrim Council

The new Council will become responsible for Greenisland on the 1st April 2015. The new Greenisland regeneration group will be taken forward by Mid and East Antrim Council.

Antrim and Newtownabbey Council

As a neighbouring local council which has similar responsibility for

schemes outside of Mid and East Antrim Council's jurisdiction - but are currently part of the Development Framework

Local Community

Given the significant role the local community played in the formulation of the Development Framework, it is anticipated that they will be one of the key stakeholders in taking it forward.

Transport NI

Transport NI is the authority responsible for roads throughout Northern Ireland. Transport NI manage, maintain and development the road network. Enhancements are recommended in the plan which Transport NI will be required to support.

Translink – NI Railways

As landowners of significant lands within Greenisland, Translink will be required to support many of the schemes such as the Greenway and Station Improvements.

Other statutory authorities such as Libraries NI etc.

Private Developers and Landowners

The Council, project steering group and government bodies should encourage and work with private developers, investors and landowners to ensure implementation of the Development Framework.

8.5 Conclusion

In conclusion, the consultancy team would like to thank the project steering group and all the individuals and groups that have assisted in the production of the Development Framework. In the context of a changing world with the transferring of powers back to local government and the emphasis on community planning, the Greenisland Development Framework offers a very real opportunity to realise the vision of a fully regenerated and integrated community which has retained its own sense of character and identity.

It is important that momentum is not lost and that early wins are clearly identified and that the local community is fully engaged to achieve the vision for Greenisland.



Appendix 3: Proposal Site

Shore Road/Whinfield Lane, Greenisland

- The proposal site consists of two parcels of lands which can both be served by way of separate accesses from the Shore Road.
- The southern and western boundaries of the site about the current settlement limit. Residential development is the dominate land use within the immediate area, with dwellings along the Shore Road and Whinfield Lane abutting the site.
- The topography of the site is predominately flat and new development could be easily incorporated into the urban form of the settlement.
- The A2 Shore Road dual carriageway to the north of the site provides a strong definitive physical barrier which prevents any further development and frames the proposal lands as a unique locational opportunity created as a result of the dualling of the A2 Shore Road.



Turley Office
Hamilton House
3 Joy Street
Belfast
BT2 8LE

T 028 9072 3900