



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

Miss

First Name **(Required)**

Emma

Last Name **(Required)**

Walker

Email

emma.walker@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.

Vaughan Homes

Client Contact Details

Title

First Name (Required)

Last Name (Required)

Address Line 1 (Required)

Aercon Works

Line 2

556 Antrim Road

Line 3

Town (Required)

Newtownabbey

Postcode (Required)

BT36 4RF

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

MEA-DPS-077



**Mid & East
Antrim**
Borough Council

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MEA draft Plan Strategy Representations

Vaughan Homes

December 2019

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Client

Vaughan Homes

Our reference

VAUB3001

11 December 2019

Executive Summary

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

Schedule of key draft Policy Comments

Policy	Comment	Para Ref
Draft Policy SGS3	<p>The draft policy sets out plans for too few new homes and under-allocates, with the potential to undermine the Spatial Growth Strategy. It does not take sufficient account of the RDS insofar as it is understood to direct a scale of growth to the main settlements. Neither does it sufficiently recognise and plan for cross-boundary connections.</p> <p>Draft Policy SGS3 is unsound as the policy fails soundness tests C1, C4, CE1 and CE4.</p>	3.1-3.51
Draft Policy SGS5	<p>The overall intent of this policy is welcomed insofar as it provides a mechanism for review of the housing land supply but, as drafted, the approach limits its potential effectiveness by restricting itself to existing settlement limits.</p> <p>Draft Policy SGS5 is unsound as the policy fails soundness tests CE1 and CE4.</p>	3.52-3.57
Draft Policy GP1	<p>The draft policy is inconsistent with the SPPS presumption in favour of sustainable development and lacks clarity.</p> <p>Draft Policy GP1 is unsound as the policy fails soundness tests C3 and CE2.</p>	4.1-4.6
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>	5.2-5.8
Draft Policy	<p>The draft policy is not supported by a robust evidence base and in its current form would conflict with the</p>	5.1-5.26

HOU5	<p>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> <p>Draft Policy HOU5 is unsound as the policy fails soundness tests C3, CE1, CE2, CE3 and CE4.</p>	
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>	5.27-5.46
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>	5.47-5.65
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>	5.66-5.80
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>	6.1-6.23
Draft Policy FRD4	<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>FRD4 is unsound as the policy fails the test of CE2, CE3 and CE4</p>	6.24-6.34

1. Introduction

- 1.1 This representation is submitted on behalf of Vaughan Homes in response to the consultation on the Mid & East Antrim (MEA) Borough Council draft Plan Strategy (dPS). The Vaughan Homes representation made in response to the publication of the Preferred Options Paper (POP) is at Appendix 1.
- 1.2 Since their inception in 1985 Vaughan Homes has grown considerably, building a reputation for creating properties of quality and distinction having completed numerous developments throughout the NI, including in MEA.
- 1.3 The company has a keen interest in planning and the delivery of quality neighbourhoods that meet the needs of current and future generations of MEA residents.
- 1.4 This submission is structured to respond to the key sections of the draft Plan Strategy that are of relevance to Vaughan Homes.

2. Legislative Compliance

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

2.2 This section identifies issues in the compliance of the dPS with the Act and the Regulations.

Planning Act (Northern Ireland) 2011

2.3 Part 2 of the Act stipulates that the Plan Strategy should be prepared in accordance with the Council's timetable, as approved by the Department for Infrastructure ('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 did publish the dPS within the 3rd Quarter of 2019 as indicated in the approved timetable as it was made public on 17 September. However, we would highlight that the timetable shows that this timeframe will include:

- An 8 week statutory public consultation period; and
- An 8 week statutory consultation on counter representations.

2.5 We note that the formal consultation period on the dPS did not commence until 16 October 2019 and therefore falls outside of the broad timeframe set out in the timetable. This also means that the counter-representation stage falls outwith the agreed timeframe and could result in further conflict with the timetable.

2.6 In preparing a Plan Strategy, the Council must take account of:

- "the regional development strategy;
- The council's current community plan;
- Any policy or advice contained in guidance issued by the Department;
- Such other matters as the Department may prescribe or, in a particular case, direct, and may have regard to such other information and considerations as appear to the council to be relevant."

2.7 This representation identifies specific instances where, in particular, policy issued by the Department has not been adequately assessed.

2.8 The Act also requires that the Council:

"(a) carry out an appraisal of the sustainability of the plan strategy; and

(b) prepare a report of the findings of the appraisal."

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

3. Strategic Housing Representations

Draft Policy SGS3 - Strategic Allocation of Housing to Settlements

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

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

- 3.8 The plan horizon is to 2030 – presumably calculated as 15 years from 2015 when Council assumed plan making responsibility. On the basis of the Council's 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

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

of Elected Members, a robust level of resourcing (within the LDP team, consultees and that of the Independent Examiner), as risks.

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

Issues with HGIs; recessionary trends & suppressed build rates

- 3.16 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

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

useful reminder of the purpose and value of HGIs (Appendix 3). 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 'policy neutral' is a particularly important point to consider. If, as the evidence discussed below would suggest, this means that the disaggregation/distribution of HGIs calculated at regional level, to Council level has not had regard to policy such as the RDS' regional spatial strategy and is simply a projection of population and household trends which the RDS direction has yet to properly influence, this must reduce extent to which the Council should take account of it.
- 3.18 The table below compares the 2012 based HGIs to the recently published 2016 based HGIs, with the difference identified in the final column. It is clearly evident that Belfast's HGI has been significantly reduced by the refresh exercise undertaken by DfI (-46%), as has fellow Belfast Metropolitan Area (BMA) Councils Antrim & Newtownabbey (-42%) and Ards & North Down (-23%). The HGI for other Councils such as ABC has been significantly increased (+19%). These changes are at odds with the RDS policy objective of strengthening Belfast as the regional economic driver within a framework of balanced regional growth.

Table 3.1: HGI Analysis

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

Sources: 2012 & 2016 Based HGIs

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

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

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

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

examination could usefully reflect on the assumptions and evidence base which underpins the figures, including vacancy rates, second home ownership and stock replacement. The extent to which the household formation figures are influenced by the forward projection of recessionary household characteristics such as involuntary sharing arising from challenges securing mortgages could also have been considered. As it stands, these figures have been produced with no public or stakeholder scrutiny whatsoever.

- 3.22 Despite the consistency of use of language between the DfI and dPS insofar as there is an acknowledgement that they are for guidance, not a cap/target to be met⁴ (etc), the dPS approach is to adhere to it as far as possible because it *finds no sound reason for departing from it*.⁵ Unlike other Councils, such as Belfast and Lisburn & Castlereagh, MEA has not commissioned independent analysis of the HGI so the extent to which the Council has investigated the asserted position of HGIs as 'best available evidence' is unclear. 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 2006⁶, is projected forward to 2030 ($12 \times 661 = 7932$), or 2035 ($17 \times 661 = 11,237$) the housing requirement would be much higher.

Insufficient housing allocated to the Main Hubs

- 3.25 The constraining effect of uncritically adopting the HGI as foundation is apparent in the allocation to the main settlements as reported in TS3 Tables 7.1 and 7.2. The main town total share of the allocation has been increased by 3.5% from the option identified as preferred in the Preferred Options Paper (POP), apparently as a result of concerns raised by DfI in respect of the risk of disproportionate share of growth in lower tier settlements, which would fail to strengthen the population in the hubs.⁷

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

⁵ Technical Supplement 3 (TS3): Housing para 7.8.

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

⁷ Technical Supplement 3 (TS3) para 5.7.

The 3.5% increase is described as intended to significantly increase the 2011 baseline proportion of households in the main towns.⁸

- 3.26 Whilst the objective, consistent as it is with RDS direction, is welcome, the scale of the allocation is unlikely to achieve the significant shift sought. The combined effect of the sheer number of other settlements in the settlement hierarchy and the diluting effect of the rural policy, in combination with the adherence to the HGI was unlikely to yield an allocation to Main Hubs which was consistent with the RDS direction. As a result, the risk of disproportionate growth in lower level settlements undermining the pursuit of sustainable enhancement of critical mass in the Main Hubs remains. As does the potential to undermine the Spatial Growth Strategy intent to manage growth to secure sustainable patterns of development across MEA and focus major (our emphasis) population growth and economic development in the three main towns of Ballymena, Carrickfergus and Larne, strengthening their roles as the prime locations for business, retail, housing, administration, leisure and cultural facilities within the Borough. Our comments on the Sustainability Appraisal underpinning the dPS are at Appendix 2.
- 3.27 The only way to address this issue is to significantly exceed the HGI derived allocation. Taking account of the RDS direction on main hubs is a sound reason for departing from it and there should be sufficient flexibility available within the application of the Housing Evaluation Framework to facilitate such a departure.
- 3.28 It is important to note that the objective of enhancing the critical mass of main hubs has been well established for some time now but the evidence would suggest that it has proven to be difficult to deliver. For example, Table B2 of the RDS shows that the proportion of district population in Ballymena town was 49% in 1998, falling to 47% in 2008. TS3 Appendix D provides a 2011 population figure of 29,467, 46% of the 2011 Borough population of 64,044, so the direction of travel is downwards. In this context the planning intervention needs to be of sufficient scale to achieve the desired result and certainly of a higher order of magnitude than 3.5%; the HEF/allocation for the main hubs is considered further below.

Carrickfergus: Limited consideration of potential requirement to accommodate overspill from Belfast

- 3.29 Carrickfergus is different to the other main hubs of Ballymena and Larne insofar as it is the only one of MEA's main hub within the Belfast Metropolitan Urban Area (BMUA), the area defined in the RDS as the continuous built up area centred on Belfast with an arc from Jordanstown to Knocknagoney, including the city of Lisburn and towns of Bangor, Carrickfergus and Holywood.⁹ The RDS (para 3.36) recognises the BMUA as the major conurbation in Northern Ireland with a thriving retail, service, administration, cultural and educational centre in the City of Belfast. It is the Region's largest employment centre and is at the centre of the regional transport network and the major gateway for national and international trade.
- 3.30 The Plan recognises the RDS references to Carrickfergus in that it picks up references to, for example, the need to promote the regeneration of Carrickfergus town centre but the functional role of Carrickfergus as part of the BMUA, particularly the

⁸ Technical Supplement 3 (TS3) para 7.9.

⁹ RDS Glossary p107

relationship between the respective housing and employment markets does not come through strongly in the draft PS. Whilst it has a scale and critical mass of its own, it also has a physical and functional relationship. With its attractive setting on the shores of Belfast Lough and its high quality road and rail connectivity with Belfast City Centre, Carrickfergus makes an important contribution to meeting the housing needs of the wider conurbation. The Council recognises its part within the wider City-Region and is now one of the six partner Councils included in the Belfast Region City Deal (BRCD).

- 3.31 Strategic planning for this relationship is important because if Belfast City Council's ambitious plans to grow its economy, consistent with RDS SFG1, are to be realised, there will be a significant need for additional housing. In Regional Guidance 8 (RG8), the RDS (para 3.15) states that 'strategic planning places emphasis on the importance of the relationship between the location of housing, jobs, facilities, services and infrastructure'. However, the evidential basis of the dPS is also weak insofar as notwithstanding the well-established transboundary housing market which extends to Antrim & Newtownabbey and Belfast, it appears to not have been informed by either a Council specific or BMA wide Housing Market Analysis by the NIHE or others. This is important, not least because Belfast City Council flag the possibility of neighbouring districts within the wider metropolitan area – specifically Lisburn & Castlereagh and Antrim & Newtownabbey – potentially identifying land to be used for housing to accommodate some of Belfast's population growth.
- 3.32 If Belfast's ambitious plans, founded on economic growth, are adopted but it cannot meet its own housing requirement, other options could be explored such as neighbouring authorities in the wider metropolitan area, such as MEA, zoning land to accommodate some of Belfast's population growth.
- 3.33 Belfast City Council Draft Plan Strategy Technical Supplement 2: Housing para 4.18 states that any such areas agreed would need to have excellent connectivity to Belfast, including public transport links such as BRT and rail, along key transport corridors. Whilst there is reference to Antrim & Newtownabbey and Lisburn & Castlereagh but none to MEA (presumably because MEA does not immediately adjoin Belfast), Carrickfergus in its capacity as part of the BMUA would clearly satisfy the sustainable transport related criteria given its excellent rail links to Belfast. Paragraph 5.4.14 of Appendix A of Technical Supplement 9: Transportation confirms that Carrickfergus Rail Station is located on the Larne to Belfast railway line and operates services approximately every 30 minutes on Weekdays and Saturday.
- 3.34 The functional relationship between Carrickfergus and Belfast as an important planning consideration which bears upon its housing allocation through the HEF process is supplemented by a concern about the way in which the dPS deals with transportation more generally.

Disconnect between land use & transportation planning

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

transport and land use as fundamental to the objective of furthering sustainable development (SPPS 6.293). Taking this forward in the context of plan-making, paragraph 6.299 of the SPPS is as follows:

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

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

3.42 Paragraph 7.5.10 states that these routes are considered to be most applicable as developer led schemes to support potential land zonings.

3.43 The Transport Study (p62) contains the following conclusion:

2: Consider new orbital capacity around key town centres in conjunction with public realm enhancements or improvements to active travel modes. Capacity schemes to be developer led.

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

3.44 Taking Carrickfergus as an example, the obvious difficulty is that the Carrickfergus Spine Road as shown on Figure 2.1 of Technical Supplement 9: Transportation, a non-strategic developer led road which has been assessed as having sufficient potential benefit to Carrickfergus to have been identified in the draft Carrickfergus Area Plan 2001, further endorsed in the BMTP 2015 and protected in draft BMAP 2015, relies in substantial part on land being zoned (for housing) which is presently outside the development limit of any plan. On the basis that the road is of sufficient potential value to the town to have endured for almost 25 years it must reasonably be regarded as an opportunity to address the transport needs, problems and opportunities within the town but the potential to achieve integration between transportation and land use planning is being frustrated by the deferral of the assessment of this opportunity until LPP stage by which time the obvious risk is that the housing allocation for the town will be too low to justify the scale of expansion necessary for a developer-led transport scheme like this.

3.45 The POP submission on behalf of Vaughan Homes (Appendix 1) highlighted the opportunity, which could still be realised, potentially on a phased basis, for a sustainable urban extension to Carrickfergus on land which has previously demonstrated its suitability to the Department. The lands are on the Belfast side of the town, could contribute to the delivery of the Carrickfergus Spine Road and are roughly equidistant between Carrickfergus Train Station and Trooperslane Halt.

3.46 Notwithstanding the change in plan-making system, the comments of Commissioners T A Rue, G Scott and J B Martin at paragraph 2.12.75 of their 14 March 2008 report into Public Local Inquiry Into Objections To The Draft Ards And Down Area Plan 2015 remain pertinent:

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

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

- 3.47 The overall analysis of the dPS is that when the housing allocation is compared to the various different sources of housing land supply, there is no requirement for any additional zonings and indeed a failure to take account of commitments and the zoning of additional land would inevitably result in gross overprovision of housing.¹⁰ Proposal SGS5 proposes to zone for housing in the urban fringe and hold in reserve as Phase 2 land, to be released only if required to meet the Strategic Housing Allocation.¹¹
- 3.48 Whilst elsewhere the plan recognises that not all permissions may be built, the plan does tend to largely uncritically rely upon some fairly large white land, undeveloped housing zonings and urban capacity sites within its overall housing land supply.
- 3.49 When reviewed on a site by site basis, the data shows that a very significant number of the sites are longstanding and have not delivered any houses. For example, the review of Carrickfergus set out at Appendix 4 shows how many sites which are relied upon from a housing land supply perspective have not made a housing contribution for many years, and in some cases, show no prospect of doing so in the continued absence of a planning application.
- 3.50 The briefing note at Appendix 5 provides evidence on how long it can take for housing to make an effective contribution. The dPS is not supported by any evidence on the housing trajectory, which undermines the robustness of its assertions around oversupply of housing land.
- 3.51 To ensure the delivery of a sound plan, it is incumbent on the Council to interrogate the housing land supply data in order to satisfy itself that there is a deliverable supply. This may mean that long standing sites which have not delivered houses are discounted from the housing land supply because they cannot be relied upon. With evidence suggesting housing completions have increased in recent years, the supply of deliverable housing land in the larger sites may be exhausted well before the stated end date of the Plan.

Draft Policy SGS5 - Management of Housing Supply

- 3.52 The LDP strategic approach to the management of housing supply is grounded in the policy aims below.
- To ensure an appropriate supply of land to accommodate the new homes required to meet the full range of housing needs; and
 - To promote sustainable housing development within the urban footprint of our largest towns to achieve a compact urban form and more sustainable development patterns.
- 3.53 In order to provide a managed release of housing land in settlements, SGS5 proposes phasing the release of housing land according to a sequentially preferable approach.

¹⁰ Technical Supplement 3: Housing (para 7.25).

¹¹ Technical Supplement 3: Housing (para 7.36).

- 3.54 In the Main Towns and Greenisland two phases are proposed, with Phase 2 land (existing urban fringe) held in reserve until Phase 1 land (live permissions/likely permissions & urban capacity sites).
- 3.55 Based on the justification and amplification text, the intent of this approach is summarised below:
- Create compact towns, through a sequential approach to the phasing of land, in order to avoid urban sprawl by, in the first instance, focusing the growth of the residential population within the existing urban footprint;
 - Holding Phase 2 lands, located outside the urban footprint but within the settlement development limits, as a land bank to meet future need (providing a vision for the long term expansion of the largest towns within existing settlement limits);
 - Phase 2 lands will not be released for housing development until its designation changes to phase 1 as a consequence of an LDP amendment following a Plan review;
 - When releasing phase 2 land, account will be taken of the latest Housing Growth Indicators, the strategic housing allocation, current land availability, housing building rates and infrastructure capacity;
 - To ensure a sequential approach to development, when determining which land should be released to phase 1, account will be taken of its accessibility to the town centre and core services and also the availability of infrastructure;
 - During reviews of the LDP, consideration will be given to the level of commitment and investment made by landowners to release and progress delivery of phase 1 housing land. Where no demonstrable progress has been made, consideration will be given to re-designating the land at review stage;
 - The release of phase 2 housing land may also be considered where it has been demonstrated that there is insufficient uncommitted phase 1 housing land to meet affordable housing needs. Such a need should be supported by NIHE and should be selected taking into account the sequential approach above.
- 3.56 The overall intent of this policy is welcomed insofar as it provides a mechanism for review of the housing land supply which seeks to address over-reliance on sites which are not being brought forward for housing. However, the approach limits its potential effectiveness by restricting itself to existing settlement limits, which is understood to mean settlement limits in the current set of statutory plans.
- 3.57 To ensure the overall coherence and effectiveness of the Plan Strategy and so satisfy soundness tests CE1 and CE4 this policy needs to be reviewed alongside SGS3 and extended in scope to consider the potential requirement for urban fringe land outside of existing settlement limits. This will support the Spatial Growth Strategy intent to:

- Manage growth to secure sustainable patterns of development across Mid and East Antrim.
- Focus major population growth and economic development in the three main towns of Ballymena, Carrickfergus and Larne, strengthening their roles as the prime locations for business, retail, housing, administration, leisure and cultural facilities within the Borough.

4. General Policy for all Development

Draft Policy GP1 – General Policy for all Development

- 4.1 The first paragraph of draft Policy GP1 states:

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

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

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

- 4.3 Furthermore the SPPS goes on to say that:

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

- 4.4 The policy approach endorsed in the SPPS is in accordance with Section 45 of the Planning Act which requires that regard is had to the local development plan in the determination of a planning application.

- 4.5 Furthermore, as set out in the SPPS a balanced approach to development proposals is required. There may be cases where a proposal represents sustainable development but is in conflict with a policy within the LDP. In this case other material considerations may be attached more weight. As drafted, Policy GP1 does not facilitate the balanced approach to assessing development proposal.

- 4.6 We recommend that, in order to prevent a conflict with soundness test C3 that draft Policy GP1 should be revised to reflect the wording contained within the SPPS.

5. Building Sustainable Communities

5.1 Section 8.0 of the dPS sets out the Council's policy aims with respect to Building Sustainable Communities, including the delivery of housing and open space. This section of the representation comments upon the following draft Policies:

- HOU1 – Quality in New Residential Developments in Settlements
- HOU5 – Affordable Housing in Settlements
- HOU6 – Housing Mix
- HOU7 – Adaptable and Accessible Homes; and
- OSL4 – Public Open Space in New Residential Developments.

Draft Policy HOU1 – Quality in New Residential Developments in Settlements

5.2 Draft Policy HOU1 sets out the requirements for all new residential development to provide a high quality, sustainable and safe residential environment. This requirement is supported.

5.3 The draft policy states:

“Where a need is identified adequate provision should be made for necessary local neighbourhood facilities to be provided by the developer as an integral part of the development.”

5.4 It is unclear how the need will be identified. This information should be available to ensure that developers know up front 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 A concept masterplan is to be required for a development of 200 dwellings or more of where the site is 10 hectares or more. We note that this is a lower threshold than is currently applied within PPS7 Policy QD2. The council has failed to provide evidence to justify the departure for the threshold set out in PPS7 and therefore it does not comply with soundness test C3.

5.7 The Council has also failed to consider the legislative requirement for some forms of planning applications, including major residential applications to be accompanied by a Design and Access Statement. The General Development Procedure Order 2015 (Article 6(3)) prescribes that a design and access statement must explain the design principles

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

“also demonstrate how the proposed development’s context has influences the design.”

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

Draft Policy HOU5 – Affordable Housing in Settlements

- 5.1 Draft Policy HOU5 sets out the Council draft policy position on the provision of affordable housing. Essentially it seeks to secure 20% affordable housing within main and small towns and 10% affordable housing with other defined settlements where the development will comprise of 10 or more dwellings or a site size of 0.2ha or more.
- 5.2 It is acknowledged that the Housing Strategy presented within the draft Plan Strategy aligns with regional policy objectives as set out in the Regional Development Strategy (RDS), specifically the inclusion of policy mechanisms to provide for the needs of everyone and the provision of mixed tenure housing developments.
- 5.3 Whilst the principle of securing a mix of tenure provision is supported we are concerned that there is insufficient evidence provided to support the Council’s draft policy.
- 5.4 Technical Supplement 3 on Housing expands upon the provisions of draft Policy HOU5. It sets out that the policy has been prepared in consultation with NIHE. Paragraph 8.1.37 of the dPS sets out that:

“in applying this policy, the up to date Housing Needs Assessment (HNA) for Mid and East Antrim, currently carried out annually by the NIHE will be a material consideration.”

- 5.5 The supporting information provided in Technical Supplement 3 indicates that the 2018 assessment was used in defining the draft policy, however this information is not provided in support of the dPS. It would be expected that the Council would publish all relevant supporting information which it is reliant upon to inform policy alongside the dPS which is out for consultation. This significant void in evidence to support the draft policy is worrying and would result in the plan failing against soundness test CE2. The SPPS sets out at Paragraph 6.139 that:

“Housing Needs Assessment/Housing Market Analysis – provides an evidence base that must be taken in to consideration in the allocation, through the development plan, of land required to facilitate the right mix of housing tenures including open market and special housing needs such as affordable housing, social housing, supported housing and travellers accommodation. The HNA will influence how the LDPs facilitate a

reasonable mix and balance of housing tenures and types. The Northern Ireland Housing Executive, or the relevant housing authority, will carry out the HNA/HMA.”

5.6 The SPPS is therefore clear that the HNA should inform the LDP. Whilst the Council has referenced the HNA, it is not specifically included within the supporting evidence base for the draft Plan Strategy and therefore it could not be demonstrated that the plan would comply with soundness test C3.

5.7 Technical Supplement 3 seeks to summarise the assessment by NIHE in various sections and it is acknowledged in paragraph 7.39 of the supplement that the social housing need varies within settlements. The same paragraph goes on to state:

“Examining this need alongside the notional housing allocation figure for each settlement, uncovers a number of settlements where completions and live planning permissions would already meet the allocation figure but would not meet the social rented housing need. For all these settlements, save for Broughshane, the social rented housing need could potentially be met by urban capacity and/or windfall potential.”

5.8 The Council is reliant upon land identified in the Urban Capacity Study (Technical Supplement 3) to secure the delivery of affordable housing; however we consider that there are a number of weaknesses 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.

5.9 Based on these weaknesses, the conclusions reached on the ability for social housing to be secured on such sites could be flawed. Without undertaking a detailed site assessment of the proposed sites we are concerned that the Council cannot robustly demonstrate that this is the case and therefore the policy conflicts with soundness test CE2.

5.10 The council has acknowledged in the supporting evidence that there are variations in need for social and intermediate housing across the borough. However, the policy approach proposed in the draft Plan Strategy does not adequately reflect the variances. Furthermore the borough wide approach is a departure from the approach endorsed in the SPPS (Paragraph 6.143). There is no evidential case for a departure from the SPPS in this case and as such fails soundness test C3.

- 5.11 The draft Policy is seeking to set a threshold of 10 or more units or 0.2 hectares or more, however we can find no evidence of how this threshold has been determined and whether any alternatives were considered. On this basis, there is a conflict with soundness test CE3.
- 5.12 Technical Supplement 3 sets out that the approach set out in the POP¹² has evolved as a result of further analysis and discussions with NIHE.
- 5.13 It was initially proposed that for Main Towns the requirement would be for 25% and for Small Towns it would 15%, however NIHE raised potential concerns about the viability of development at that level and that 20% would be more appropriate. The 20% applies also to Small Towns given the substantive need for provision in those locations. No substantive evidence is provided with the dPS to support this view and therefore there is a conflict with soundness test CE3. It is also noted that the policy as drafted does not facilitate flexibility to ensure viability or exceptions to the provision of affordable housing. As such the draft policy conflicts with soundness test CE4.
- 5.14 The supporting text to draft Policy HOU5 defines affordable housing as including social rented and intermediate housing. Intermediate housing is defined in the dPS Glossary as consisting of:
- “shared ownership housing provided through a registered housing association and helps households who can afford a small mortgage, but that are not able to afford to buy a property outright. The property is split between part ownership by the householder and part social renting from the registered housing association. The proportion of property ownership and renting can vary depending on householder circumstances and preferences. The NI definition of intermediate housing may change over time to incorporate other forms of housing tenure below market rates. Where this is the case, such additional products will be considered suitable to help meet the affordable housing obligations of the policies in the LDP.”*
- 5.15 The flexible approach alluded to above is welcomed, however this should be expressed within the main policy section of the dPS to ensure that the policy is considered flexible enough to respond to future changes in the definition of affordable housing. This flexibility will assist in ensuring that the policy complies with soundness test CE4.
- 5.16 At the time of preparing this representation, the Department for Communities (DfC) had launched a consultation paper on proposed changes to the definition of Affordable Housing. While the proposed change would have no direct impact upon social housing, it would provide an opportunity for the private sector to provide intermediate housing products alongside registered housing associations.
- 5.17 As currently worded the policy is reliant upon the Housing Needs Assessment to identify the need for affordable housing. We would urge the council to ensure that the HNA is able to provide evidence of need for all future forms of affordable housing, should the definition change.

¹² Every 10th Unit in a housing scheme to be social

5.18 Paragraph 8.1.39 of the dPS provides further supporting text for the draft Policy. We are concerned that this paragraph suggests that a higher affordable housing provision requirement may be identified in some locations through the Local Policies Plan (LPP). This would not be consistent with the dPS and therefore the LPP could be unsound. The same paragraph also reinforces the view that a site specific approach may be more appropriate if evidence suggests that the current draft policy would be insufficient in some locations. Such an approach would align with paragraph 6.143 of the SPPS.

5.19 We note that the dPS does not include a policy relating to the provision of specialist accommodation, including care or elderly accommodation. Section 3 of Technical Supplement 3 (Housing) acknowledges that the Council area has an ageing population and goes on to say that:

“In 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%.”

5.20 It would therefore be appropriate to ensure that a policy to provide for changing demographics is included within the dPS, particularly given that it will guide the form and location of development for at least the next 15 years.

5.21 The Council goes on at in Section 3 to say:

“The LDP will take account of the implications of these trends, for example in the delivery of appropriate housing in areas accessible to health and community services.”

5.22 Given the recognition of the need for the LDP to take account of demographic trends we would recommend that the Council include a policy relating to the specialist accommodation. A gap in this policy would not be reflective of the Council’s evidence base.

Soundness Test

5.23 Draft policy HOU5 fails to satisfy the following soundness test:

- P3 – Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- C3 – Did the council take account of policy and guidance issued by the Department?
- CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;
- CE3 - There are clear mechanisms for implementation and monitoring; and
- CE4 - It is reasonably flexible to enable it to deal with changing circumstances

Recommendation

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

- Undertakes a robust and coherent assessment of the effectiveness of the policy by:
 - Identifying a sample of sites of varying scales and types across the housing markets within the borough;
 - Undertaking a feasibility appraisal to understand the residential capacity of the sites;
 - Identifying the other policy requirements and developer contributions that would be applied to the development.
 - Identifying a series of affordable housing requirements (e.g. 5, 10 and 20% - ‘reasonable alternatives’).
 - Undertaking a strategic viability appraisal of each requirement level for each site to understand the threshold for viability; and
 - Applying the findings of the viability assessment to inform a proposed policy approach.

5.25 This approach is well established within other jurisdictions.

5.26 The Council should also consider any potential exceptions to the provision of affordable housing, for example the provision of elderly housing or development which would facilitate the reuse of heritage assets.

Draft Policy HOU6 – Housing Mix

5.27 The dPS identifies draft policy HOU6 as being an operational policy that will help to achieve the SPPS objective of nurturing ‘balanced communities’. In addition, the dPS considers the ‘*...provision of a range of well-designed house types and sizes...*’ to be an important factor in building sustainable communities.

5.28 Having reviewed draft policy HOU6, it is clear that it seeks to mirror the provisions of the extant Policy HS4 of PPS 12 – Housing in Settlements. However, it is noted that draft Policy HOU6 contains new provisions and modifications which are not contained within Policy HS4 of PPS12.

5.29 We summarise below the main differences between draft policy HOU6 and HS4 of PPS12:

- HOU6 proposes to remove reference to the word ‘only’ from the first sentence of HS4;
- HOU6 proposes to insert the following new requirement not contained in HS4 – ‘*...Provision should particularly be made for smaller homes to meet future household requirements in Mid and East Antrim*’;

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

‘Currently, analysis of the local housing market in Mid and East Antrim shows an ageing population, reducing household size and a decline in the number of households with children. This emphasises the need for ‘smaller size, new build houses’ within the Borough (Mid and East Antrim Housing Market Analysis Update, NIHE, June 2018).’

- 5.38 It is noted that the above rationale flows from the analysis of PPS12’s HS4 set out in Appendix H of Technical Supplement 3. In addition to the above, Paragraph 3.9 of Technical Supplement 3 seeks to reinforce draft Policy HOU6’s approach in stating the following:

‘By 2030, it is projected that small households will make up 61% of the population. Consequently, this suggests that smaller size, new build housing, across all tenures, will be required to meet future household need in Mid and East Antrim’.

- 5.39 However, and importantly, Paragraph 3.10 of Technical Supplement 3 advises that *‘...this **needs to be caveated** as **not all** one or two people households may **want to live in a smaller property** if they can afford a larger property’ (our emphasis).*
- 5.40 So far as housing mix is concerned, relevant policies need to incorporate an appropriate degree of flexibility to allow developments to respond to the local market context and the local market need/demand. This flexibility will ensure that: innovation is not stifled; a product that the market wants is being provided; and development viability can be secured. Otherwise, these new developments will not be delivered. The overly restrictive wording with the draft policy conflicts with the flexible approach to be applied under soundness test CE4.
- 5.41 The ‘Justification and Amplification’ states that the proposed policy 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.
- 5.42 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.
- 5.43 This new component of policy (when compared with HS4 of PPS12) is not supported by an appropriate evidence base which has considered the implications of such a policy on the ability of new residential developments to deliver a product that the market wants and on the overall viability of such a development. Indeed, Council has accepted that not all smaller households want a smaller home.
- 5.44 In terms of the ‘smaller schemes’ approach, the proposed policy fails to provide clarification on what considerations will be taken into account when assessing the individual merits of the site/proposal and as such fails against soundness test CE3.

Soundness Tests

- 5.45 Draft policy HOU6 fails to satisfy the following soundness test:

- P3 – Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- C3 – Did the council take account of policy and guidance issued by the Department?
- CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;
- CE3 - There are clear mechanisms for implementation and monitoring; and
- CE4 - It is reasonably flexible to enable it to deal with changing circumstances.

Recommendation

5.46 To ensure that the dPS can be considered a ‘sound’ plan, we respectfully request that the Council:

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

Draft Policy HOU7 – Adaptable and Accessible Homes

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

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

- 5.50 Our client welcomes the overall intention of the draft policy. Indeed, the delivery of accessible and adaptable homes capable of meeting the needs of their future users will help to improve the attractiveness of the housing product being provided. Our client also welcomes the acknowledgment that there may be instances where not all of the proposed policy criteria can be accommodated.
- 5.51 However, it is considered that the ‘exceptional circumstances’ test would be too high a threshold in terms of justifying a relaxation of the proposed policy, particularly noting that the policy only appears to suggest a single ground for an exception, i.e. ‘...meeting other planning policy requirements’.
- 5.52 The draft policy is entirely different from the preferred option set out under Key Issue 15, which referred only to apartments. Furthermore, having reviewed Technical Supplement 3 – Housing, we are unable to find any evidence which supports the Council’s proposed policy or sets out: why the policy should be applied to every new home and not a proportion of new homes; or how the Council assessed the implications of the proposed policy with respect to development viability. As such the draft policy would fail soundness test CE2.
- 5.53 We note that the POP, under Key Issue 15, advises that the proportion of the Mid and East Antrim population aged 65+ years is projected to rise from 16.5% in 2011 to 25% by 2030. The POP also advises that the 2011 Census revealed that 11% of people in Mid & East Antrim suffered a mobility or dexterity difficulty.
- 5.54 Technical Supplement 3 also makes reference to the above figure re: ageing population. However, these figures do not justify the application of the proposed policy to every new home. People tend to move through different housing products at different stages in their life and choose a home based on their financial circumstances and specific needs (which vary over time).
- 5.55 A sound approach would be to ensure that a proportion of new housing is tailored to these more specialised needs rather than forcing developers to construct every new dwelling to this standard. Indeed, further evidence would be required to establish the appropriate proportion taking into account development viability and any subsequent policy should incorporate an appropriate degree of flexibility. In its current form the draft policy would conflict with soundness test CE2 and CE4.
- 5.56 In terms of the financial consequences of the proposed policy, Technical Supplement 3 makes reference to a study undertaken in NI in 2002 and other research undertaken in the UK. Based on this study/research, it identifies that the additional costs associated with delivering the requirements of Lifetime Homes is estimated to range between £165 and £1,615 per dwelling.
- 5.57 Technical Supplement 3 then concludes that ‘Given that those elements of the Lifetime Homes Standards which have been incorporated into HOU7 are not onerous, it is not anticipated that this policy would have significant additional cost implications’.
- 5.58 We are concerned by the lack of evidence base upon which the Council avows that the new requirements, which will apply to every new house in a new development, are ‘not onerous’.

- 5.59 Technical Supplement 3 appears to base this conclusion on a perceived cost that is presented in isolation from all of the other costs associated with delivering new housing. No consideration has been given to how these costs or the implications of the proposed policy will affect overall development viability, particularly constrained sites or sites with abnormal costs associated with them.
- 5.60 It is common knowledge that brownfield sites represent some of the most difficult sites to redevelop/regenerate noting the inherent issues around physical constraints, infrastructure/access issues and legacy issues, such as contamination/remediation. Further policy requirements, like this proposed policy, which lacks an appropriate degree of flexibility, could unintentionally restrict the regeneration of brownfield sites. This outcome would be at odds with the overarching regional policy direction set out in the RDS of locating ‘...the majority of new housing in appropriate brownfield sites within the urban footprint of larger towns’ as acknowledged in Para. 5.3.17 of the dPS.
- 5.61 This statement also fails to consider the cumulative impact of other policy developer requirements/contributions on the cost and viability of development and therefore would fail soundness test CE1.

Soundness Tests

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

Recommendation

- 5.65 To ensure that the dPS can be considered a ‘sound’ plan, we respectfully request that the Council:

- prepares an up-to-date evidence base to support this policy, particularly the requirement for all new dwellings, flats and apartments to comply with the proposed policy;
- reassesses whether the evidence supports this policy position or an approach which requires a proportion of new housing to achieve the identified standards;
- if after the assessment, is minded to pursue the proportion approach, 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

- 5.66 The Council's overall 'Open Space Strategy' is set out within Section 5.8 of Part One of the draft Plan Strategy. The dPS advises at paragraph 5.8.4 that *'The policy aims [of the Open Space Strategy] will be delivered primarily through the open space operational strategic subject policies set out in Part 2'*, i.e. draft Policies OSL1 to OSL7.
- 5.67 This submission focuses specifically on the provisions of draft Policy OSL4, which sets out policy requirements and exceptions for the provision of public open space in new residential development.
- 5.68 Having reviewed draft Policy OSL4, it is clear that it seeks to mirror, by and large, the provisions of the extant Policy OS2 of PPS 8 - Open Space, Sport and Outdoor Recreation. However, it is noted that draft Policy OSL4 contains new provisions and/or modifications which are not contained within Policy OS2 of PPS8.
- 5.69 We summarise below the main differences between OS2 of PPS8 and proposed policy OSL4:
- proposes to include an open space requirement of 15% for sites of 10 hectares or more –PPS8 Policy OS2 applies this requirement only to residential developments of 300 units or more or development sites of 15ha or more and no justification for a variation to the prevailing policy is provided by the Council;
 - proposes to replace the phrase 'ease of access' contained in the 2nd bullet point of criterion (iii) of PPS 8 Policy OS2 with 'direct and unobstructed access'. No further clarify on how direct and unobstructed access will be defined or the rational for the variance in the wording is provided within the dPS.
 - proposes to remove the exception 'incorporates the 'Home Zone' concept' contained in the 4th bullet point of criterion (iii) of PPS8 Policy OS2. Again no justification for the removal of this approach is provided within the dPS.;

- proposes, after the adoption of the Local Policies Plan, to remove the exception in PPS8 Policy OS2 for an equipped play space to be provided in residential developments of 100 units or development sites of 5ha if an equipped children's play area exists within reasonable walking distance (generally 400m) of the majority of units within the development;
 - proposes, after the adoption of the Local Policies Plan, to replace the abovementioned exception with 'unless otherwise specified through the key site requirements on sites zoned in the Local Policies Plan';
 - proposes to remove the following criterion of PPS8 Policy OS2 for public open space – 'its design, location and appearance takes into account the amenity of nearby residents and the needs of people with disabilities'; and
 - proposes to remove the following criterion of PPS8 Policy OS2 for public open space – 'it retains important landscape and heritage features and incorporates and protects these in an appropriate fashion'.
 - proposes to remove the acceptable arrangements with respect to maintenance and management of public open space areas from the policy text and insert them into the 'Justification and Amplification' section only;
 - proposes to remove the requirement for all developers to be responsible for the laying out and landscaping of public open space from the policy text and insert it into the 'Justification and Amplification' section only;
- 5.70 The 'Justification and Amplification' section of draft Policy OSL4 proposes to introduce the mechanism of developer contributions which is not referred to/contained in PPS8.
- 5.71 As set out above the draft Policy seeks to vary extant planning policy within PPS8. The dPS does not contain nor is it supported by the required evidence base to justify the requirements of proposed policy OSL4, particularly the 15% open space requirement for 10 hectare sites or more.
- 5.72 Furthermore, the dPS does not provide any justifications or explanations for why the proposed policy does not accord with the 'preferred option' set out in the Preferred Options Paper (POP) under Key Issue 19 - Open Space Provision in New Residential, this being:
- 'Retention of the current strategic criteria based policy regarding public open space contained in Policy OS 2 of PPS 8 i.e. setting out a 10% requirement of open space in residential developments of 25 units or more and a 15% requirement for development over 300 units and an amended list of exceptions where a rate less than 10% may be acceptable unless otherwise specified through key site requirements'.*
- 5.73 It is noted that Section 6.1 of Technical Supplement 4 - Open Space, Sport & Leisure, dated September 2019, states that 'The preferred options and recommendations from the POP have generally been brought forward to the draft Plan Strategy, with minor amendments'. Table 6.1 of Technical Supplement 4 sets out these 'minor' amendments.

5.74 It is considered that the proposal to apply the 15% open space requirement threshold to sites over 10 hectares rather than 15 hectares/300 units is considered to be a 'significant' amendment not a 'minor' amendment, which is not supported by robust justification.

5.75 Section 6.3 of Technical Supplement 4 seeks to provide the following justification for why the proposed amendment to the 'preferred option' identified under Key Issue 19 of the POP is considered acceptable:

'In regards to Key Issue 19 and draft Plan Strategy Policy OSL4, it was considered that the threshold for 15% open space requirement should be reduced from 15 hectares to 10 hectares given that the size of residential applications in Mid and East Antrim are generally well below 300 units.'

5.76 The justification provided is inadequate as it fails to consider the potential impact that such a requirement could have on the overall viability of a project or the implications arising out the maintenance and management of such areas. This could have a significant impact on the delivery of the policy and indeed the delivery of housing land within the district, resulting in a conflict with soundness test CE2.

5.77 In its current form, the proposed policy does not provide an appropriate degree of flexibility, particularly for sites that may have development constraints, which could include topography issues, ecological and environmental sensitivities, contamination issues, access issues and built heritage considerations. As such the draft policy conflicts with Soundness test CE4.

Soundness Test

5.78 Draft policy OSL4 fails to satisfy the following soundness test:

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

Recommendation

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

- prepares an up-to-date evidence base to support this policy, particularly the new 15% open space requirement affecting sites of 10 hectares or more, and then reassesses whether the evidence supports this policy position;
- ensures the proposed policy incorporates an appropriate degree of flexibility by making it clear that open space requirements will take into account the site

specific merits of each individual planning application, such as land constraints, site enabling costs and development viability;

- defines what is meant by ‘direct and unobstructed access’ to areas of existing public open space contained in the exceptions provided under b) of OSL4; and
- ensures that any proposed requirements for developer contributions or future guidance related to developer contributions builds in development viability considerations.

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

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.

Draft Policy FRD4 Sustainable Drainage

- 6.24 Section 9.2 of the dPS sets out the Council’s policy aims with respect to ‘Flood Risk and Drainage’ and it sets out a number of operational strategic subject policies, i.e. FRD1 to FRD6, which will assist in achieving these aims. Draft policy FRD4 sets out policy requirements and exceptions for sustainable drainage solutions (SuDS). It is clear from the dPS that the draft policy is intended to promote the use of SuDS and this is welcomed.

- 6.25 The dPS (at Para 9.2.6) claims that the ‘...policy aims [of the Flood Risk and Drainage section] fully embrace the... regional strategic objectives and guidelines for LDPs set out in the SPPS’. Paragraph 6.104 of the SPPS sets out the regional strategic objectives for the management of flood risk which includes encouragement of the use of sustainable drainage. Paragraph 6.118 then goes on to state:

“in managing development, particularly in areas susceptible to surface water flooding, planning authorities should encourage developers to use sustainable drainage systems (SuDS) as the preferred drainage solution.”

- 6.26 We note that the policy wording in the SPPS identifies a preference for SuDS, whilst the draft Policy in the dPS is enforcing the use of the sustainable drainage. We would suggest that the approach set out within the dPS provides no flexibility as it would require all developments of 10 or more units to provide for SuDS unless the site is unsuitable. Paragraph 9.2.44 of the dPS states:

“Where an applicant considers a site to be fundamentally unsuitable for SuDS, the reasons for this must be set out in the Drainage Assessment and supported by a suitably qualified engineer.”

- 6.27 This would indicate that only technical drainage reasons can be used to challenge the suitability of a site for SuDS. As drafted, the policy also fails to consider the implications on development viability for smaller schemes. As such it is considered that the draft Policy would conflict with soundness test CE2 and CE4.

6.28 Part two of draft Policy FRD4 states:

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

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

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

6.30 It is our understanding that there are currently no management companies within Northern Ireland who would take on the management and maintenance of SuDS. Furthermore, to date NI Water has not been open to adopting soft SuDS and we are not aware of the Council confirming that they would adopt SuDS as indicated in the dPS. Given the lack of assurance around the adoption of SuDS it is unclear how, or if, this policy will be implemented.

6.31 Furthermore, the policy requires maintenance in perpetuity. No consideration has been given to the burden of such a requirement on the developer and potential onward cost for the end users. Costs associated with maintenance and management could render smaller developments unviable.

6.32 As such the draft policy conflicts with CE2, CE3 and CE4.

Soundness Tests

6.33 Draft policy therefore FRD4 fails to satisfy the following soundness test:

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

Recommendation

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

Appendix 1: POP Response

Mid & East Antrim
Local Development Plan
Preferred Options Paper Response
Vaughan Homes – Woodburn Road,
Carrickfergus

September 2017

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Client

Vaughan Homes

Our reference

VAUB3001

6 September 2017

Executive Summary

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

1. Strategic Response

Do you agree with the Vision for the LDP?

- 1.1 The proposed vision for the LDP is:

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

- 1.2 We support the vision from the Council to develop a sustainable and well connected district. This vision is founded on the three pillars of sustainable development. The objectives set out on page 41 of the POP elaborate on these further.

Do you agree with our LDP Strategic Objectives?

- 1.3 We support the approach taken in establishing objectives for each of the pillars of sustainable development. The delivery of housing is identified as a key social objective and this is welcome. We support the objective to:

“Provide a sufficient supply of land for new housing by 2030 in convenient locations to meet general housing needs.”

- 1.4 In practice we would encourage the Council to understand this objective to mean going beyond the supply of land and connect it's development management activity to ensure that planning permissions for housing developments are processed as quickly as possible to ensure that build rates can be enhanced across the district.

- 1.5 We also support the objective to:

“Meet the diverse range of specific housing needs and anticipated changes over the Plan period.”

- 1.6 We would, however, stress that housing land should be identified in suitable locations. That is, land should be identified in locations where there is a market or social demand for housing. This will ensure that land is developed and therefore the objective is achieved. We would also highlight that land should be suitable for housing development, in that residential development should be feasible and viable.

- 1.7 It is our view that the delivery of housing will also assist in supporting the delivering of other key social objectives identified in the POP, namely:

“To development the particular strengths of Ballymena, Larne and Carrickfergus, so as to enable them to realise their full potential as the main centres of population, employment and services in Mid and East Antrim;

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

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

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

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

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

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

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

² SPPS Paragraph 5.69

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

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

- 1.15 It is therefore important that more detail on the nature and scope of developer contributions are set out in the preparation of the plan in order for comment to be made. However, at this stage we would highlight that this should be determined based on sound consideration of:

- Infrastructure requirements that will be generated as a result of future development;
- Existing infrastructure deficits;
- Costing analysis for the delivery of infrastructure; and
- Viability of development sites.

- 1.16 Furthermore, the Council will need to liaise closely with and establish partnerships with infrastructure providers to ensure that developer contributions are feasible. We would reiterate that the Department clearly states that:

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

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

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

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

³ Development Management Practice Note 21 – Section 76 Planning Agreements

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

- 1.20 The Council is proposing a housing requirement of 6,230 new homes across the 15 year plan period. This requirement is based on the HGI published in April 2016 and represents a significant reduction from the previous HGI. The POP does not include any consideration of alternative housing requirements and as such fails to present options for consideration. This approach is unsound as there is no evidence of the options considered within the POP and no robust evidence of how the proposed requirement has been derived.

- 1.21 The use of the HGI places an unnecessary limitation on growth ambitions for the Council. The Council acknowledged that HGIs are not ceilings or targets and are a guide for the preparation of the LDP. The Council should be more ambitious in pursuit of its vision and growth aspirations than the HGIs. Against the proposed housing requirement, there appears to be a large supply of undeveloped zoned land remaining, however, the conclusion that there is a limited requirement to find additional supply seems to be founded on an un-evidenced assertion that every house in the Housing Monitor can be relied upon to be delivered within the Plan period.

- 1.22 Whilst Housing Monitor information is provided on a settlement level to give an indication of remaining supply there is no evidence presented at a site by site level to demonstrate that all committed sites (zoned and/or consented) are suitable and can be delivered, indeed the evidence provided by a comparison of successive housing land availability reports would suggest that there are several large sites in each of the main towns which have so far failed to deliver any housing whatsoever. The table below identifies (only) sites capable of yielding 100 or more houses where development has not started. Whilst each of these zoned/committed sites must be treated on its own merits and in some instances their locations within the urban footprint and relative to existing areas of housing would strongly militate against any 'dezoning', the Council's analysis of its effective housing land supply should be informed by the type of trend tracking envisaged by the Plan-Monitor-Manage approach set out in PPS12.

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

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

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

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

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

- 1.27 The Council is proposing to:

“zone sites solely for social/affordable housing in the Local Policies Plan and include key site requirements where a proportion of a general housing zoning should be provided as social housing, where a need has been identified. In addition set out a strategic policy requiring that every tenth unit within new housing developments, in settlements where a need has been identified, shall be a social housing unit.”
- 1.28 Whilst we recognise the need for affordable housing we would stress the importance of ensuring that a robust evidence base is provided in support of such a policy approach. It is important when considering such policies to have regard to the impact of an affordable housing requirement on the viability of market housing sites. Such implications should be considered when zoning land to ensure that land zoned for housing is deliverable.
- 1.29 Any such policy requiring affordable housing should only be applicable where a need is identified. This should be key factor in the Annual Monitoring Report and appropriate flexibility should be incorporated into policy wording.

2. Site Specific Response

Site Promotion

- 2.1 The site (see map at Appendix 1) is situated between the Woodburn Road to the north-west, Upper Road to the west and the Belfast/Larne railway line to the south. It extends to some 59.5 hectares (147 acres) and comprises a large number of agricultural fields delineated by mature hedgerows. A single dwelling is located within the centre of the site which is generally undulating with a fall in levels to the railway line to the south. Mature vegetation buffers the site from the rear properties of the Woodburn Road to the east.
- 2.2 Immediately north of the site are the two storey residential properties of Rathview. A mixture of commercial and residential properties provide the immediate context along the Woodburn Road, including a mixture of bungalows, semi-detached and detached properties. There is a community centre along the Woodburn Road and further to the south west is Carrickfergus Rugby Club and Woodford Fly Fisheries.
- 2.3 The site abuts the Woodburn Site of Local Nature Conservation Importance at its southern most point and the Woodburn River/The Mount Local Landscape Policy Area to the south west corner (draft Belfast Metropolitan Area Plan).

Proposal

- 2.4 These lands sit adjacent to the settlement limit of Carrickfergus and could represent an orderly and logical expansion of the settlement whether zoned in full or part. The Department's assessment in 2001 considered the lands as an appropriate location for expansion of the town as part of the draft Carrickfergus Area Plan (CAP, Appendix 2). However the lands were ultimately regarded as too extensive to bring forward in their totality and, in the absence of the presentation of any smaller scale alternative, were later removed from the development limit in the adopted plan.
- 2.5 Paragraph 4.2.8 of the presiding Commissioner's report to the Planning Appeal Commission (PAC) on the Public Local Inquiry into objections to the Carrickfergus Area Plan 2001 states:

'I do not accept that the site constitutes a natural rounding off of Carrickfergus at this point in time and, in my opinion, its release would be detrimental to any efforts to encourage brownfield development within the limit of development identified in the previous plan. No evidence was presented to me that a smaller site at this location would be appropriate'.

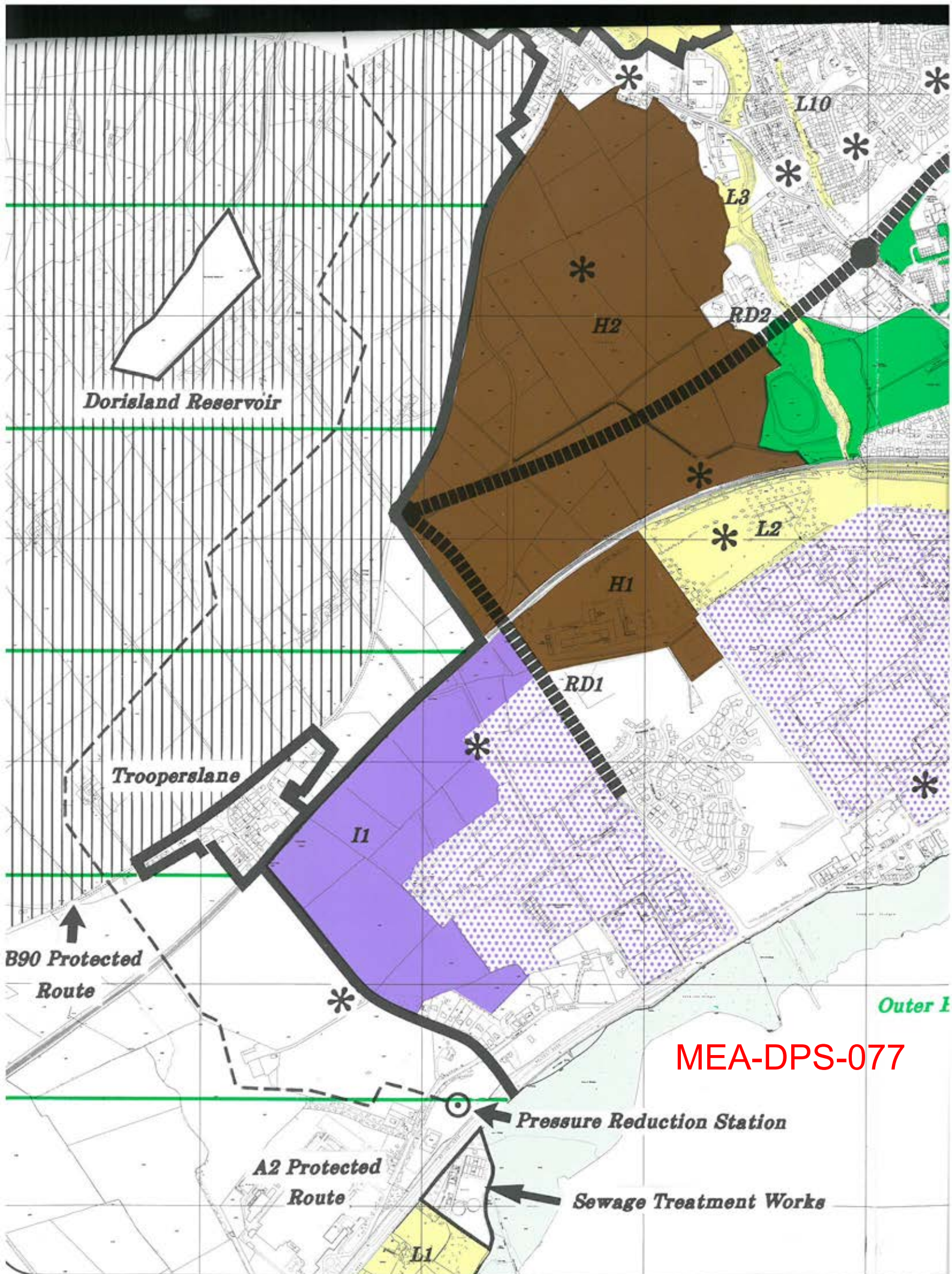
- 2.6 Importantly, no discrete section of the wider site was put forward as an alternative scale of expansion, either by the Department or any other party. In this respect, whilst the wider former draft H2 site continues to represent an opportunity for the identification of a strategic land reserve for the Carrickfergus area, which would provide certainty about the future long term urban expansion of the town, there is also an opportunity for fresh consideration to be given to options for smaller scale zonings within it. The development of such land could potentially be phased and released according to the

take up of other lands within the urban footprint, consistent with the Plan, Monitor and Manage approach to the management of an effective housing land supply.

- 2.7 An immediate opportunity exists to bring forward that part of the wider lands which lie into Woodburn Road which are identified on the plan in Appendix 1. The release of these lands, which extend to some 17 ha (42 acres) would represent orderly development within defensible boundaries and maintain the compact urban form of the town, indeed there are other potential development limits within even this smaller area should there continue to be a concern about even this scale of potential development.
- 2.8 There are access options available either off the Upper Road (B90) or from Woodburn Road, opposite Pheasant Drive.
- 2.9 Vaughan Homes has a good appreciation of the local housing market in Carrickfergus and are confident that the site could deliver approximately 30-50 completions per year depending on the scale of site released. Their intention would be to make a planning application at the earliest opportunity and commence construction as soon as practically possible thereafter.

Appendix 1: Site Location Plan

Appendix 2: Draft Carrickfergus Area Plan Extract



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Appendix 2: Review of Sustainability Appraisal

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

December 2019

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

1. A review of the Sustainability Appraisal (SA) documents produced in support of the Mid and East Antrim (M&EA) Local Development Plan (LDP) Draft Plan Strategy September 2019 has been undertaken.
2. The documents that have been reviewed are;
 - 1.2.1 Mid and East Antrim District Council Local Development Plan 2030, Draft Plan Strategy, September 2019 (hereafter referred to as the DPS).
 - 1.2.2 Mid and East Antrim District Council Local Development Plan, Sustainability Appraisal (hereafter referred to as The Draft SA Report) of the LDP Draft Plan Strategy Incorporating the Strategic Environmental Assessment, September 2019.
3. For Northern Ireland the relevant guidance with respect to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is;
 - 1.3.1 Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 (the EAPP Regulations); and
 - 1.3.2 Development Plan Practice Note. Sustainability Appraisal incorporating Strategic Environmental Assessment. April 2015.
4. Given the complexity of the SA process and the experience (including relevant case law referenced in these representations) of its application in England, Scotland and Wales, it is also recommended by the guidance above¹ to refer to the following guidance where necessary;
 - 1.4.1 A Practical Guide to SEA. Department of Communities and Local Government, September 2005
 - 1.4.2 National Planning Practice Guidance. Strategic environmental assessment and Sustainability appraisal. (<http://planningguidance.communities.gov.uk/>).
 - 1.4.3 SEA and SA; Planning Practice Guidance (PPG); Ministry of Housing, Communities & Local Government (HCLG); February 2015;
 - 1.4.4 Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans; RTP1; January 2018; and

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

1.4.5 SEA & Climate Change: Guidance for Practitioners; Environment Agency; 2011.

5. We are fully supportive of the principles of sustainable development and the need to positively tackle the climate crisis by ensuring that new housing is allocated in the most sustainable locations to encourage the use of sustainable modes of transportation for commuting and travel.

Concerns relating to the SA process

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

Draft Policy - SGS1 Spatial Growth Strategy

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

² https://www.planningni.gov.uk/index/advice/practice-notes/dp_practice_note_4_sa.pdf. Paragraph 3.1

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

13. Technical Supplement 2 (TS2), Appendix B identifies Ballymena as a highly sustainable location:

- *Ballymena benefits from an excellent location on the edge of the BMUA with easy access to the International and City airports and Ports of Larne and Belfast. It has a significant retail centre which is complimented by nearby tourism attractions, including the Causeway Coast and Glens.*

14. Section 3.2.1 of the draft SA presents the summary of the assessment of draft Policy SGS1 to which we have the following comments:

- The draft SA confirms that no reasonable alternatives have been considered for this policy as it is considered to uphold the principles of the Regional Development Strategy (RDS) Framework. Table 5.1 of TS 3 (Housing) indicates that overall percentage of housing to be allocated under the preferred option is 62% (an increase of only 3.5%) to the main towns.
- Representations by Turley Planning demonstrate that there is a strong justification for Carrickfergus to be viewed more positively given its location within the Belfast Metropolitan Urban Area, thereby justifying a greater potential of housing.
- Appendix B of TS2 (Settlement Hierarchy) describes Larne as:
 - *Larne is situated in a strategic coastal location. It provides strong linkages between NI and Scotland. Its road and rail links form part of the Trans-European Networks. Its position on the Causeway Coastal Route has potential to create a centre for tourism*
- Given the strong description of Ballymena as an economically active retail destination, the consideration of Carrickfergus within the BMUA and the view that Larne is a potential tourist hub, we believe there is ample justification to consider reasonable alternatives to the distribution of housing between the three main towns. Under this scenario it is reasonable to suggest that the greater majority of housing within the three main towns should go to Ballymena and Carrickfergus as Larne (given its function as a tourist hub) does not justify the same percentage of housing compared to key economically active towns.

15. Page 142 of the draft SA presents the summary of the assessment of draft policy SGS1 against the SA Framework for which we have the following comments:

- The SA scores a minor positive impact against SA Objective 5 (sustainable economic growth) as a result of the strategy. We believe that this scoring reflects a lack of ambition from M&EA District Council as, given the importance of the main towns as economic hubs, further housing and employment allocations should be made to create a **major positive** benefit to sustainable economic growth.
- The SA Scores a major positive impact upon SA Objective 8 (sustainable travel) as a result of the allocations within the main towns. Representations within this document and by

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

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

Draft Policy SGS2 – Settlement Hierarchy.

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

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

Draft Policy SGS3 – Strategic Allocation of Housing to Settlements

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

Draft Policy HOU5 – Affordable Housing in settlements.

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

of evidence to support the 20% target, it is evident that this figure will change based on these factors.

- Given the above, the SA should have identified alternatives to the affordable housing provision (lower and higher than the preferred option) and tested these against the SA framework to identify the most sustainable option.

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

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

Contact

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Appendix 3: DRD 2016 HGIs

Regional Planning Directorate



Department for

Infrastructure

An Roinn

Bonneagair

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To

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Your Reference:
Our Reference:

25 September 2019

Dear Heads of Planning

RE: HOUSING GROWTH INDICATORS 2016-2030

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

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

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

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

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

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

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

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

Yours sincerely



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Housing Growth Indicators

2016-based

Housing Growth Indicators (HGIs)

2016 - 2030

WHAT INFORMS THE HGIs?



Background to the HGIs

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

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

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



Using the HGIs

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

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



NI STOCK REQUIREMENT ESTIMATE FOR 2030



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1. Background to the HGIs

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

2. Uses of the HGIs

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

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

3. Northern Ireland Housing Growth Indicators 2016-2030

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

84,800

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

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

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

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

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

potential sources were considered and a sound, consistent rationale was employed to make the decisions that formed the final estimate calculations.

- 3.6. The variables informing the calculation of the Northern Ireland estimate are shown in Table 2 and this largely reflects the methodology that was used in the 2012 based HGIs.

Table 2: Variables that comprise 2016-2030 HGIs¹

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

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

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

Number of households 2030 (A)

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

Second homes 2030 (B)

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

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

Vacant stock 2030 (C)

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

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

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

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

New stock requirement estimate 2030 (E)

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

Total stock 2016 (F)

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

Projected new dwelling requirement 2016 to 2030 (G)

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

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

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

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

4. User Information – data sources

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

4.1.1. NISRA household projections

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

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

4.1.2. NI Housing Executive House Condition Survey

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

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

4.1.3. Land and Property Services (LPS) publications

Building Control new dwelling completions data

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

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

Housing stock data - NI Domestic Valuation List

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

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

4.1.4. NISRA Central Survey Unit combined survey sample

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

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

5. Changes to data sources since 2012 based HGIs

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

5.1.1. Number of households

Data source: NISRA household projections (2016 based).

Changes to data

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

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

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

5.1.2. Second homes/Vacant stock

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

Changes to data

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

NIHE advice was that the NIHCS sample was considered too small to provide robust data for the second homes variable. Given that issue with regards to second homes and NIHCS data, it was considered that the preferred approach was to ensure consistency of data source across the calculations/relevant variables and as NISRA CSU data informed the second homes variable, the NISRA CSU data was also chosen to inform the vacant stock variable.

Additionally, using vacant stock estimates provided by NIHCS and LPS lead to an overall gain in some LGDs, which would lead to an indicator suggesting no additional requirement of homes within these areas over the HGI estimate period. This issue also occurred in aspects of the 2012 based update and was a driver for variable decision making at that time. As this is a refresh of that 2012 method, the issue has been handled similarly.

5.1.3. Net conversions/closures/demolitions

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

Changes to data

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

Calculation of estimates

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

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

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

5.1.4. Total stock

Data source: LPS Northern Ireland Housing Stock publication

Changes to data

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

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

6.1. Background to LGD level estimates

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

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

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

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

¹ Estimates are rounded to the nearest hundred.

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

6.3.1. Issues when producing LGD level data

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

Appendix 1

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

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

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

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

Household projection 2030

Data source: 2016 based household projections

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

Changes to data

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

Second homes 2030

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

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

Changes to data source

No change

Vacant stock 2030

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

To produce LGD level data:

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

Changes to data source

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

Net conversions/closures/demolitions 2016 to 2030

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

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

Change to data source

No change

Issues to note

- *Using average over 9 years*

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

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

New stock estimate 2030

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

Total stock 2016

Data source: LPS NI Housing Stock publication

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

Projected new dwelling requirement by LGD for 2016 to 2030

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

Appendix 2

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

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

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

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

Appendix 3

Useful links

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

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

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

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

RDS 2035 available on the DfI website at:

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

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

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

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

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

Land and Property Services NI Housing Stock publication is available on the DoF website:

<https://www.finance-ni.gov.uk/publications/annual-housing-stock-statistics>

Appendix 4: Analysis of Housing Land Supply

Housing Supply Analysis: Carrickfergus

Table 1: Review of Larger Type 1 Urban Capacity Sites

Ref	Size (ha)	Location	Potential Yield	Comment
11CS	13.48	Between Woodburn Road & North Road	337	<ul style="list-style-type: none"> No planning application submitted. Ownership unknown.
16CS	17.26	NW Ulidia College	432	<ul style="list-style-type: none"> Zoned within Carrickfergus Area Plan 2001. No planning application submitted. Understood NIHE identified a Preferred Developer several years ago.
37CS	5.08	Land south of 14 Bashford Drive	127	<ul style="list-style-type: none"> Zoned within Carrickfergus Area Plan 2001. No planning application submitted.
40CS	13.12	Land south of 22-36 Red Fort Drive	328	<ul style="list-style-type: none"> Zoned within Carrickfergus Area Plan 2001. Planning permission (LA02/2016/0919/F) for 289 units granted October 2017

Source: Technical Supplement 3 Appendix I – Urban Capacity Study, Table 7.2 plus LDP review and planning history searches

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

HLA Ref	Type of Site	Potential Yield	Status
17818	Zoned	207	<ul style="list-style-type: none"> No planning application submitted
17820	Zoned	429	<ul style="list-style-type: none"> No planning application submitted
17965	Zoned	95	<ul style="list-style-type: none"> Planning permission (LA02/2015/0100/F) for 96 units granted September 2016
18073	Zoned	285	<ul style="list-style-type: none"> No planning application submitted
20853	Zoned	164	<ul style="list-style-type: none"> Planning permission (LA02/2018/0154/F) for 146 units granted November 2019
20968	Zoned	125	<ul style="list-style-type: none"> No planning application submitted
21533	Redevelopment	80	<ul style="list-style-type: none"> Planning permission (V/2008/0131/O) for residential development granted February 2017

Source: 2018 Housing Land Availability Report plus planning history search

Appendix 5: Note on Lead in Times

Briefing

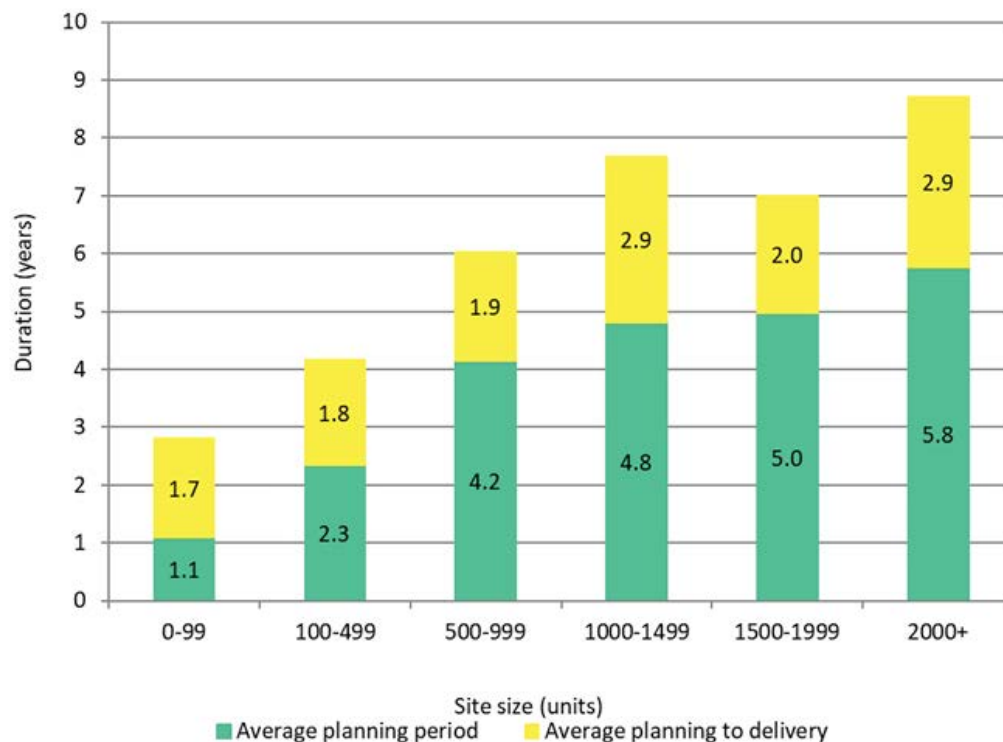
Lead-in Times

December 2019

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

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

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



Source: Lichfields, 2018

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

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

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

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

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

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

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