## Local Development Plan 2030

# draft Plan Strategy Response Form

September 2019





MEA-DPS-0

### 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: <u>consult.midandeastantrim.gov.uk</u>

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 <u>https://www.midandeastantrim.gov.uk/downloads/privacy\_notice\_ldp.pdf</u>.

### 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 <a href="https://www.midandeastantrim.gov.uk/downloads/privacy\_notice\_ldp.pdf">https://www.midandeastantrim.gov.uk/downloads/privacy\_notice\_ldp.pdf</a>. 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 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 <u>www.midandeastantrim.gov.uk/privacy-notice</u>.

#### Why are we processing your personal information?

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

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

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

### Section B. Your Details

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

#### Please only tick one

Individual (Please fill in the remaining questions in the section, then proceed to Section F.)

Organisation (Please fill in the remaining questions in the section, then proceed to Section D.)

Agent (Please fill in the remaining questions in the section, then proceed to Section E.)

#### Q2. What is your name?

Title

Mr

First Name (Required)

Michael

#### Last Name (Required)

Graham

Email

michael.graham@wyg.com

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

Unsure

	/es
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✓ No

### 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.

<b>Client Contact Details</b>			
Title			
First Name ( <b>Required</b> )			
ast Name (Required)			
Address Line 1 (Required	)		
Line 2			
Line 3			
Town <b>(Required)</b>			
Postcode ( <b>Required</b> )			

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

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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**

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P1. Has the plan been prepared in accordance with the Council's timetable and the Statement of Community Involvement?

MFA-DPS-079



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)**

Please refer to attached report.

#### (and/or)

Relevant Paragraph number(s)

Please refer to attached report.

#### (and/or)

District Proposals Map

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

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



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

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

www.midandeastantrim.gov.uk/planning



MEA-DPS-0

WYG Planning & Environment

part of the WYG group



**On Behalf of** 

Lands at Martinstown, Ballymena

Representation to Mid & East Antrim Borough Council Local Development Plan 2030 - Draft Plan Strategy

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December 2019

A115363

### Draft Plan Strategy Representation – Lands at Martinstown



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- 1.0 Introduction
- 2.0 Consideration of Draft Plan Strategy
- 3.0 Conclusions

#### **Appendices**

- 1 Site Location Plan
- 2 Martinstown Settlement Development Limit as per the Ballymena Area Plan 2001 Alteration No.1
- 3 Map indicating location of Martinstown in relation to the M&EABC area
- 4 Proposal of Application Notice ('PAN') documents in relation to LA02/2019/0410/PAN
- 5 Adjusted Housing Allocation Figures
- 6 Extract from the 2018 Housing Monitor Map
- 7 Draft Plan Strategy District Proposals Map 1

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#### 1.0 Introduction

- 1.1 This representation is on behalf of our client, **Council ('M&EABC') Local Development Plan 2030, Draft Plan Strategy**.
- 1.2 In considering this representation, and whilst site specific representations are for the next stage of this Local Development Plan ('LDP') process, it is important to note that our client has lands at Martinstown of circa 5.1hectares (comprising of 3No. parcels of 0.7Ha, 1Ha and 3.4Ha), which can be made available for future housing development.
- 1.3 Parcel No.1 comprises agricultural land located to the north of Martinstown between the Lisnamanny Road and Glenravel Road. It is bounded on 3No. sides by existing residential development and the existing settlement development limit ('SDL') of Martinstown.
- 1.4 Parcel No.2 and No.3 also comprise agricultural lands are located to the south east of Martinstown, directly adjacent to the SDL between the Glenravel Road and Martinstown Road.
- 1.5 All the parcels of land in question represent logical extensions to, or rounding off opportunities, to the SDL of Martinstown.
- A Site Location Plan showing the location of the various parcels of land owned by our client is at Appendix 1).
- 1.7 To assist M&EABC, our response follows the layout of the **M&EABC Draft Plan Strategy Document** ('DPSD') and sets out:
  - that part of the DPSD to which our representation relates;
  - whether we believe the DPSD to be sound or unsound;
  - the soundness tests which we believe are applicable;

. . . . . .

- details of why we consider the DPSD to be sound or unsound; and
- details of any suggested modifications we believe are necessary to make the DPSD sound.

Draft Plan Strategy Representation – Lands at Martinstown



#### 2.0 Consideration of Draft Plan Strategy

#### <u>Section 4.0</u> <u>Vision and Strategic Objectives (pages 29 to 31)</u>

2.1 We are supportive of the LDP **Vision** as set out on page 42. It sets out:

"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"

- 2.2 We believe that the role of Martinstown as a 'Village' (it is reclassified as such within the LDP) and local service centre, along with its future growth will help to deliver the plan Vision.
- 2.3 In light of this, we are supportive of **Paragraph 4.1.3** of the LDP Vision which states:

"In seeking to realise this Vision, the LDP will strive to deliver sufficient housing that is of good quality, in locations convenient to jobs and services and that meets local requirements in regard to factors such as size, house type and affordability. Quality residential development will also be addressed through appropriate provision of open space, landscaping and links to a wider green infrastructure network within settlements and linking to the surrounding countryside".

- 2.4 Whilst supportive of the LDP Vision in terms of delivering housing, the wording of the LDP Vision must be amended and strengthened in relation to housing. It is suggested it be amended to state: ".....<u>the</u> LDP will strive to deliver a generous provision of housing...".
- 2.5 Such amended wording would provide a more flexible and positive approach to housing provision and would undoubtedly strengthen the LDP Vision.
- 2.6 In addition, we are supportive of a number of the LDP's Economic and Social Strategic Objectives (pages 44 to 46). In particular, the following:

#### Draft Plan Strategy Representation – Lands at Martinstown



"Economic Objectives

*f)* To facilitate the provision or upgrading of public utilities infrastructure (including water, wastewater, energy and telecommunications) to meet economic and community needs; (Page 45).

Social Objectives

Creating and Enhancing Shared Space

a) To support the role of main towns, small towns, villages, and small settlements in accordance with the LDP Spatial Growth Strategy and commensurate with their place in the settlement hierarchy;

c) To provide a sufficient supply of land for new mixed tenure housing in convenient locations to meet the anticipated housing need of around 7,500 dwellings for the period 2012 to 2030, including any identified special housing needs;

*d)* To deliver quality residential environments (including associated public open space and linkages to green infrastructure networks);"(Page 45).

2.7 We are supportive of Social Objectives (a) and (c) for Martinstown (to support the role of villages and to provide around 7,500 dwellings for the period 2012 to 2030). However, to strengthen these objectives, their wording must be amended to the following:

a) To support <u>and grow</u> the role of main towns, small towns, villages, and small settlements in accordance with the LDP Spatial Growth Strategy and commensurate with their place in the settlement hierarchy;

*c)* To provide a <u>generous</u> supply of land for new mixed tenure housing in convenient locations to meet the anticipated housing need of around 7,500 dwellings for the period 2012 to 2030, including any identified special housing needs;

### Draft Plan Strategy Representation – Lands at Martinstown



- 2.8 In order to respect and consolidate such functions set out in the LDP Vision and Strategic Objectives, it will be important to ensure that there is enough land provided to facilitate future housing growth and support Martinstown's reclassified role as a <u>Village</u>. The suggested amended wording will further assist in this being realised during the lifespan of the plan through providing flexibility within the LDP's Strategic Objectives.
- 2.9 Our client has lands available which can be utilised for housing development to deliver part of the identified required provision by 2030.
- 2.10 Within the SDL of Martinstown some housing has been built in recent years with some areas of undeveloped land remaining. Whilst we acknowledge that SDLs will be defined at the Local Policies Plan stage, these remaining areas of undeveloped land within Martinstown are extremely limited. Therefore, to meet the Objectives of the LDP further land must be brought within the SDL as part of the LDP process.
- 2.11 We are also supportive of Social Objective d) which seeks to deliver quality residential environments that provide linkages to green infrastructure networks. Our client's lands are well placed in relation to the 'Regional Greenway Corridor' identified within the LDP and can provide linkages to this corridor if developed for residential or other purposes.
- 2.12 Our client represents lands at Martinstown which, if brought within the SDL, can be made available for housing development. This will support Martinstown's role and future growth as a Village, whilst also meeting and delivering the LDP's Vision and Strategic Objectives.

#### Suggested Modifications

2.13 It is respectfully suggested that the wording of the LDP Vision and Strategic Objectives are not reasonably flexible to deal with changing circumstances and therefore must be revisited and strengthened by being amended to state:

#### LDP Vision

"In seeking to realise this Vision, the LDP will strive to deliver <u>a generous supply of</u> housing that is of good quality, in locations convenient to jobs and services and that

#### Draft Plan Strategy Representation – Lands at Martinstown



meets local requirements in regard to factors such as size, house type and affordability. Quality residential development will also be addressed through appropriate provision of open space, landscaping and links to a wider green infrastructure network within settlements and linking to the surrounding countryside".

#### Strategic Social Objectives

a) To support <u>and grow</u> the role of main towns, small towns, villages, and small settlements in accordance with the LDP Spatial Growth Strategy and commensurate with their place in the settlement hierarchy;

c) To provide a <u>generous</u> supply of land for new mixed tenure housing in convenient locations to meet the anticipated housing need of around 7,500 dwellings for the period 2012 to 2030, including any identified special housing needs;

2.14 This proposed rewording would provide greater flexibility as part of the LDP. In doing so, it would be in line with soundness test **CE4 (Coherence and Effectiveness)**.

#### Section 5.0

#### Spatial Growth Strategy and Countryside Strategy (pages 48 to 109)

#### 5.1 Spatial Growth Strategy

- 2.15 Within the Ballymena Area Plan 2001 ('BAP') Martinstown was identified as a hamlet, with its SDL being defined within Alteration No.1 of the BAP on 11<sup>th</sup> December 1992. For ease, a copy of this map is provided at Appendix 2.
- 2.16 The LDP seeks to reclassify and upgrade Martinstown from its hamlet position in the BAP to that of a Village. As such, we are supportive of the Spatial Growth Strategy (Section 5.1, pages 49 to 53) and, in particular, those points of guidance relevant to the Rural Area set out in Table 5.1 which seek to: "revitalise small towns and villages" and SGS1 Spatial Growth Strategy Table 5.2 which aims to "Sustain rural communities living in and around villages and small settlements".

### Draft Plan Strategy Representation – Lands at Martinstown



#### 2.17 Paragraph 5.1.111 of the Spatial Growth Strategy states:

"Our villages will be sustained, consolidated and revitalised and they will continue to perform a role as local service centres to meet the daily needs of the rural area and accommodate rural businesses <u>and appropriately scaled residential development</u>".

[our underlining emphasis]

- 2.18 In order for those villages identified in the LDP to be sustained, consolidated and revitalised and to allow them to continue to perform their roles, it will be vital to ensure that there is sufficient land provided to facilitate future housing growth to assist in delivering the proposed Spatial Growth Strategy.
- 2.19 <u>The opportunity for new housing sites must therefore be provided, especially in Martinstown</u>. In doing so, this will help sustain and consolidate Martinstown as Village and as a Local Service Centre.
- 2.20 Its existing Local Service Centre function provides a petrol filling station and local convenience store, off license, pub/restaurant, farm supplies store, parish centre, civic amenity/recycling facilities, play area, recreation area and Primary School to the Village and the wider rural area.
- 2.21 In comparison to other Villages, Martinstown is also much better provided for in terms of local service provision. It is also well located within the Council area with excellent connectivity to the M2 motorway and Ballymena to the South West. The Village also benefits from a number of bus stops, which facilitate the No.150 bus service to Ballymena and Cushendun. A map showing the location of Martinstown in relation to the M&EABC area is at **Appendix 3**.
- 2.22 As such, Martinstown is a wholly sustainable location for future growth given its existing facilities, transport connections and existing infrastructure. Indeed, its suitability for future growth is also confirmed by the fact that there is a proposal for a new build 9No. classroom, 1,700sqm, 250No. pupil Primary School for the amalgamation of two existing schools on lands to the north of Martinstown and adjacent to the SDL. Whilst only at Proposal of Application Notice ('PAN') stage under reference LA02/2019/0410/PAN (refer to Appendix 4), it provides further evidence of the importance and support role Martinstown provides to the surrounding area. This role must be supported moving forward.

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2.23 Additional housing allocation is therefore required for Martinstown in order to facilitate the LDP's proposed Spatial Growth Strategy and consolidate and strengthen the Village's sustainable position within the M&EABC area, whilst also maintaining and sustaining its role as a local centre, providing opportunities for housing, services and employment. The inclusion of our client's lands will help assist in providing for future housing to support the Spatial Growth Strategy and role of Martinstown.

#### 5.2 Settlement Hierarchy

- 2.24 The M&EABC LDP Settlement Hierarchy is set out at Section 5.2 and at **SGS2** at **Table 5.3** (Page 58) of the DPSD. This builds upon the M&EBC Preferred Options Paper ('POP') and identifies and reclassifies Martinstown as a village from its small settlement position within the BAP.
- 2.25 It state at its paragraph 5.2.7:

"The Settlement Hierarchy designates 11 villages, including the former small settlement of Martinstown. They will continue to meet the daily needs of the rural area and provide a range of development opportunities appropriate to their location, size and scale".

- 2.26 Given the current position of Martinstown as a hamlet within the BAP, s the LDP's proposed Settlement Hierarchy which seeks to reclassify it as a Village is supported.
- 2.27 It is noted from Council's *Technical Supplement 2 Settlement Hierarchy & Strategic Settlement Evaluation*, that as part of the feedback from a settlement workshop undertaken with Council members "*There was unanimous support for the promotion of Martinstown from a small settlement to a village*" (paragraph 3.8, page 39).
- 2.28 This support is unsurprising given Martinstown is extremely well provided for in terms of local services and transportation/connectivity and is in an extremely sustainable location. Its identification as a village is therefore wholly appropriate and sound.
- 2.29 We therefore support the proposed Settlement Hierarchy in so far as it relates to Martinstown being reclassified as a Village within the M&EABC LDP.

### Draft Plan Strategy Representation – Lands at Martinstown



#### 5.3 Strategic Housing Allocation Strategy

- 2.30 The LDP sets out at Section 5.3 details of M&EABC's *Strategic Housing Allocation Strategy.* The strategy aims *"To achieve <u>sustainable</u> patterns of residential development"* (paragraph 5.3.7, page 61 of the DPSD) [our underlining emphasis].
- 2.31 In achieving this aim paragraph 5.3.1 states:

"Planning for future housing growth across the Borough is one of the core functions of the Local Development Plan as <u>the provision of housing is key to population growth</u> which in turn provides the critical mass to support the provision of infrastructure and <u>services such as health, education and community facilities</u>".

[our underlining emphasis]

2.32 Paragraph 5.3.2 further identifies:

"...While the emphasis in the RDS is on directing most housing growth to the larger urban areas (or hubs), <u>it also recognises the importance of supporting rural</u> <u>communities so that they remain vibrant and sustainable</u>".

[our underlining emphasis]

- 2.33 We are supportive of this aim and the fact that the strategic housing allocation recognises the importance of supporting rural communities so that they remain vibrant and sustainable. In delivering this aspect and supporting rural communities, villages such as Martinstown play a key role.
- 2.34 However, our main concern relates to the soundness of LDP's proposed housing allocation figures for Martinstown and the identified Villages and the methodology used to derive same.
- 2.35 It is our opinion that the housing allocation and methodology used to calculate it is unsound. It is not based upon a robust evidence base, nor does it provide suitable flexibility to address potential change and need during the plan period. We expand below.

### Draft Plan Strategy Representation – Lands at Martinstown



2.36 As set out in the *Strategic Housing Allocation Strategy*, provision of an appropriate housing allocation is key, as it provides the critical mass necessary to support the provision of infrastructure and services such as health, education and community facilities and thus sustain and provide for onward growth of settlements. The aspirations of the LDP for the Village of Martinstown cannot be delivered without the appropriate housing allocation to support it. Paragraph 5.3.4 (page 60) states:

"The proposed strategic housing allocation is considered to align with the RDS and LDP Spatial Growth Strategy. It also takes account of the relevant housing allocation guidelines set out in paragraph 6.139 of the SPPS".

- 2.37 The SPPS process for allocating housing land is further detailed in *Existing Housing Commitments* at paragraphs 7.18 to 7.20 (page 31) of the LDP's *Technical Supplement 3 Housing.*
- 2.38 Paragraph 5.3.5 (page 60) goes on to state:

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

- 2.39 In taking account of the Strategic Planning Policy Statement ('SPPS') Guidelines, the Strategic Allocation of Housing to Settlements 2018-2030 for the M&EABC area (refer to Table 5.4 at page 62 of the DPSD) sets out housing allocations. These consider the Housing Evaluation Framework ('HEF') and completions between 2012 and 2018 as required by the SPPS.
- 2.40 In doing so, the LDP allocates 421No. units to the M&EABC Villages (reduced from 636No. once HEF is considered) of which Martinstown is apportioned a negative allocation of -16No. units.
- 2.41 Paragraph 5.3.8 (page 63) identifies:

"The main determining factor for the distribution of dwellings across the settlement hierarchy was the allocation of the HGI figure to the settlement tiers in accordance

#### Draft Plan Strategy Representation – Lands at Martinstown



with RDS direction and the Spatial Growth Strategy. This means the majority of dwellings were allocated to the main towns tier. Within each tier, its allocation was split among individual settlements taking account of the distribution of households between those settlements at the time of the 2011 Census, followed by application of the RDS Housing Evaluation Framework. Dwellings completed in individual settlements since 2012 were then subtracted to determine the remaining notional allocation for the settlement until the end of the Plan period".

- 2.42 Whilst the above methodology has considered completions between 2012 to 2018, appropriate consideration has not been given to build rates as part of the housing allocation methodology and distribution of the allocation. Whilst basing the allocation on households is rational, the distribution of the allocation based on same only is unsound.
- 2.43 It is our opinion that build rates also need to be factored into the distribution of the allocation amongst the Villages, in order to provide a more appropriate and realistic allocation and also to avoid negative allocations as per Martinstown.
- 2.44 *Appendix A Figure A3 Housing unit completions in Settlements and the Countryside 2012-2018*, at page 319, further sets out the allocation for the various settlements taking into completions during the period 2012-2018 and at **Table 5.4**, identifies an allocation of 421No. to the M&EABC Villages. This results in Martinstown having a negative allocation of -16.
- 2.45 Figure A3 also considers live residential planning permissions for the settlements. In doing so, it identifies that a number of the Villages exceed their allocation through live planning permissions Kells/Connor, Ballycarry, Clough. However, in many cases, final allocations are vastly in excess of historic build rates, which are detailed at Figure A3 at page 319 (refer to the adjusted housing allocation figures spreadsheet at **Appendix 5** Columns G, K, L & M for differences between both).
- 2.46 The completions for the Villages between 2012 and 2018 totals 215No. which equates to an average build rate of 36No. dwellings per year. In the case of Martinstown, it is 32No., which equates to a build rate of 5No. dwellings per year (refer to **Appendix 5**).

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- 2.47 Applying historic build rates to the plan period (to 2030) gives a figure of 394No. required dwellings (refer **Appendix 5**). As such, pro-rata build rates and allocation are relatively similar (refer to column H &L of **Appendix 5**).
- 2.48 In terms of existing commitments page 320 of the DPSD states:

"Using the most up to date Housing Monitor it indicates that, in some settlements the existing live planning permission commitments are already greater than their remaining allocation figure for 2018-2030 e.g. in the towns of Ballymena, Greenisland (by the most 71), Broughshane and Cullybackey and in the villages of Ballycarry, Kells/ Connor, Clough and Martinstown. Carrickfergus, Larne, Ahoghill, Portglenone, Ballystrudder, Cargan are quite close to meeting their allocation figure through existing live permission being just 17, 34 and 21, 3, 6, 6 units below respectively. The villages of Ballygalley, Carnlough, Glenarm and Glynn would require around 30-40 more units to meet their allocation. In Whitehead existing live approvals fall well short of the notional housing allocation figure (see Table A3 Housing Allocation 2018-2030 and Live Residential Planning Permission in Settlements April 2018)".

- 2.49 Live planning permissions are also considered in *Appendix A Table A3 Housing Allocation 2018- 2030 and Live Residential Planning Permission in Settlements at April 2018* Page 321.
  However, when considered against historic build rates these do not provide enough housing allocation.
- 2.50 In the case of Martinstown, 9No. dwellings from live planning permissions are identified within Appendix A. These units are confirmed in the most recent *Housing Land Availability Report 2018* for M&EABC, which identifies 3No. sites (Nos.13341, 14776 and 14975) within the SDL of Martinstown which still have remaining potential of 1No., 4No., and 4No. dwellings respectively. These sites have the benefit of the following planning permissions detailed at **Table 1** below.

### Draft Plan Strategy Representation – Lands at Martinstown



Housing	Planning	Location	Description of	Date of
Monitor 2018	Reference		development	permission
Reference				
13341	G/2000/0075/O	Lisnamanny	Site Of 3 No. Dwellings	10 <sup>th</sup> March 2001
		Road, adjacent		
		to Glenravel		
		Primary School		
14776	G/2007/0790/F	1 Railway Side,	Proposed demolition of	28 <sup>th</sup> October 2008
		Glenravel Road,	existing dwelling and	
		Martinstown	construction of 4	
			apartments and 1no town	
			house	
14975	G/2007/0810/F	79 Glenravel	Demolition of existing	14 <sup>th</sup> August 2009
		Road,	dwelling and construction	
		Martinstown,	of 4 no semi-detached	
		Ballymena	dwellings and 1 no	
			detached dwelling	

**Table 1 – Planning Permissions relating to Housing Monitor Commitments.** \* It is notable that all of these are more than 10No. years ago and the first, no Approval of Reserved Matters appears to have been made. Thus, their deliverability is questionable.

- 2.51 An extract from the 2018 Housing Monitor Map is at **Appendix 6**.
- 2.52 Paragraph 5.3.9 comments on such instances where allocations have been exceeded stating:

"It is acknowledged that in some settlements the existing live planning permission commitments (including those under construction and those approved but not developed) are already greater than their remaining allocation figure (see Appendix A Broad methodology for Strategic Housing Allocation – Existing Commitments). <u>The status of some of these sites may change prior to the Local Policies Plan e.g.</u> permission for some of the undeveloped sites may lapse. This will be reviewed at that <u>stage</u>".

[our underling emphasis]

2.53 In relation to live planning permissions, the LDP also states at its page 320:

. . . . .

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"The latest Housing Monitor indicated that at April 2018, it was estimated that current live planning permissions within settlements (outline, reserved matters and full) could provide approximately 4,000 dwelling units. It is recognised that these may not all be built and as progress is made through the LDP process some may lapse and other planning permissions will be forthcoming. This will be reviewed at Local Policies Plan stage".

2.54 In terms of the *Management of Housing Supply* paragraph 5.3.31 (page 69) states in relation to *Villages and Small Settlements* that:

"To retain flexibility for meeting various local needs, land will not be zoned for housing in villages and small settlements. Instead, where necessary, land will be identified as Housing Policy Areas (HPAs) in villages to indicate where it is anticipated that most new housing should be located. <u>In order to meet the Spatial Growth Strategy, this</u> <u>may require amendments to the existing settlement limits defining our villages. This</u> <u>will be reviewed at Local Policies Plan stage</u>".

[our underling emphasis]

- 2.55 When considering the remaining live planning permissions against historic build rates, this would equate, in the case of Martinstown, to 2No. years supply (based on historic build rates of 5No. per year).
- 2.56 This is inappropriate, as it does not provide enough housing provision to cover a 5No. year period to when a plan review would take place and allocations could be reviewed. As such, this is evidence that the proposed allocation is inflexible and not in line with paragraph 6.140 of the SPPS, which requires: *A 'plan, monitor and manage' approach is necessary to ensure that, as a minimum, a 5 year supply of land for housing is maintained*.
- 2.57 In addition, it is noted that **Figure A6** (page 325) provides *Notional Housing allocation 2018-*2030 in relation to Existing Approvals/remaining potential within settlement limits in Villages and current projected Social Rented Need until 2030.
- 2.58 This provides a graph of the Villages showing live approval units, housing allocation and 'Remaining

#### Draft Plan Strategy Representation – Lands at Martinstown



potential within settlement limits'. The 'Remaining potential within settlement limits' is not referenced or sourced for the Villages.

2.59 In relation to small towns and main towns, such figures come from the Urban Capacity Study. An urban capacity study has however, not been undertaken for the Villages. 'Remaining potential within settlement limits' for Villages is defined within *Figure 7.6 of Technical Supplement 3 Housing Page 38* where it reproduces Figure A6. It states:

"Note: The estimated remaining potential figure for individual settlements (indicated in yellow) is not a conclusion on the suitability/availability of lands for housing nor does it serve to provide a determination that planning permission for housing or housing of this quantity would be granted".

- 2.60 There are no maps or any other evidence to back up these 'Remaining potential figures within settlement limits' or to explain/justify on what basis these estimates have been made. The absence of an urban capacity analysis for the Villages means the potential of available sites to make a meaningful contribution to the housing allocation within the M&EABC area has not been appropriately assessed. As such, the assessment of remaining potential for the villages cannot therefore be considered as sound or in line with the SPPS.
- 2.61 In light of the above, our position is that distribution of allocations based solely on households is unsound as it results in allocations which (in many cases) are in excess and disproportionate to the historic build rate of settlements. Reapportioning is required.
- 2.62 Such a methodology and resultant allocations has resulted in Martinstown being placed with a negative allocation. This is ineffective in a situation where the LDP aims to strengthen the role of Villages such as Martinstown, which is a desirable and sustainable place to live. As such, an adjusted allocation to Martinstown is required to reflect historic build rates and its elevation in the settlement hierarchy to a Village.
- 2.63 Therefore, it is our position that there is a further level of analysis which needs to be undertaken that considers historic build rates and further adjusts allocation on the basis of same. We have undertaken some analysis at **Appendix 5.** The allocation also needs to better reflect where people want to live and where is desirable to live. In terms of Martinstown it is highly accessible with excellent connectivity

### Draft Plan Strategy Representation – Lands at Martinstown



to the M2 motorway and Ballymena to the South West and public transport provision. Its existing Local Service Centre function provides a petrol filling station and local convenience store, off license, pub/restaurant, farm supplies store, parish centre, civic amenity/recycling facilities, play area, recreation area and Primary School to the Village and the wider rural area. It has also been identified as the location for a new merged primary school. As such, Martinstown is clearly a desirable place to live and also a wholly sustainable location for future growth given its existing facilities, transport connections and existing infrastructure and future aspirations, ...

#### Suggested Modifications

- 2.64 The Housing Growth and Allocation in respect of Martinstown is unsound on the basis that it fails to meet tests C3 (Consistency tests) and also CE2 and CE4 (Coherence and Effectiveness tests). The proposed allocation methodology has not fully taken account of the SPPS. The allocation itself is inappropriate and unsustainable and does not provide a reasonable level of flexibility to enable it to deal with changing circumstances.
- 2.65 Modifications must be made to Housing Growth and Allocation in terms of the distribution of allocation to Martinstown in order that it can be provided with a positive allocation to support its role in the LDP as a Village.
- 2.66 Martinstown is well placed, more so than other Villages, within the M&EABC area in respect of connectivity and its location; and, given Martinstown boasts comparable, if not greater services and facilities than other identified villages. A negative strategic housing allocation is therefore unsustainable and ineffective in delivering the LDP's Vision, Strategic Objectives.
- 2.67 If a greater and positive allocation is identified for Martinstown then additional land must be brought forward to allow for flexibility. There are only a small number of potential development sites within the existing SDL thereby further reinforcing that additional land requires identification.
- 2.68 Allocations should be further analysed to take into account historic build rates and allocations adjusted appropriately. Our worked example adjusts the allocations based on the historical build rate and proposes an adjusted allocation to Martinstown of 63No. (refer to column O at **Appendix 5**) It is our opinion that that this provides a more robust and sustainable approach.

### Draft Plan Strategy Representation – Lands at Martinstown



- 2.69 An expansion of the SDL to allow for additional lands to be brought forward would be of benefit and guard against a scenario occurring where future housing development is stifled in Martinstown thereby preventing it from fulfilling its role as a Village and rural service centre. These modifications would ensure that there is flexibility to allow housing to be delivered during the plan period. It simply cannot function as a Village without this flexibility.
- 2.70 Whilst a matter for the Local Policies Plan stage, our client's lands are best placed to facilitate any additional housing provision. The lands would provide an appropriate inclusion to, rounding off and consolidation of the SDL at Martinstown and are best placed to facilitate an increased positive Growth Allocation, as it is not able to be met within existing SDL. The inclusion of our client's lands within Martinstown will provide a sustainable consolidation of the settlement and help to reinforce and strengthen its position within the wider M&EABC area.
- 2.71 In providing such modifications it would provide greater coherence and effectiveness to this part of the LDP, bringing it in line with soundness tests C3 (Consistency tests) and also CE2 and CE4 (Coherence and Effectiveness), whilst better assisting in meeting the needs of the M&EABC 2030 LDP moving forward.

#### <u>5.8 Open Space Strategy</u>

2.72 It is noted that Martinstown within the LDP is identified to be located on a '*Regional Greenway Corridor'* as depicted on *Draft Plan Strategy District Proposals Map 1* (extract at Appendix 7). Such corridors are discussed as part of the LDP's Open Space Strategy under *SGS9 Open Space Strategy* at page 86. It states:

"Facilitating the development of regional and local community greenways as part of a green and blue infrastructure network: The LDP will support the delivery and protection of the following regional greenways proposed within the Borough:

- Belfast to Larne (Primary Network)
- Belfast to Carrickfergus (Secondary Network)
- Mossley to Carrickfergus via Greenisland (Secondary Network)
- Ballyclare to Ballymena (Secondary Network)
- Ballymena to Cushendall (Secondary Network)

### Draft Plan Strategy Representation – Lands at Martinstown



• Ballymena to Kilrea (Secondary Network)

Proposals that protect, complement, extend or improve this network will be supported. The LDP will also support the delivery and protection of local community greenways within settlements and potentially connecting to the regional network beyond settlements. <u>These will be identified in the Local Policies Plan</u>".

[our underling emphasis]

- 2.73 Whilst we support the identification of Regional Greenway Corridors and the benefits that will likely arise through Martinstown being located on same, these must not stifle future development or sterilise land from future development. Indeed, as set out in relation to Social Objective d) of the LPD, our client's lands are well placed in relation to the 'Regional Greenway Corridor' and can provide linkages to this corridor if developed for residential or other purposes.
- 2.74 We comment further below in respect of relevant strategic operational policies relating to Greenways set out under *Section 8.2 Open Space, Sport and Leisure* and also reserve the right to comment further on such matters at the Local Policies Plan stage.

#### Section 6.0 General Policy for All Development (pages 112 to 119)

#### Draft Policy GP1 – The General Policy for All Development

2.75 **Draft Policy GP1 – The General Policy for All Development** is provided to ensure that the development of the M&EABC area occurs in a sustainable way. Paragraph 6.1.1 at page 113 states:

"The General Policy will therefore apply to all development proposals (excluding minor proposals) including development provided for by way of exceptional circumstances...."

- 2.76 **Draft Policy GP1** sets out a number of general principles relating to development and provides that planning permission will be granted for sustainable development where the proposal accords with the LDP and there is no demonstrable harm to interests of acknowledged importance.
- 2.77 **Draft Policy GP1** relates to a number of areas which include:

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- a) Criteria relating to Design Quality and Respecting Local Character and Distinctiveness;
- b) Criteria relating to Safeguarding Residential Amenity;
- c) Criteria relating to Access/Movement/Car Parking;
- d) Criteria relating to Safety and the Safeguarding of Human Health/Wellbeing;
- e) Criteria relating to Sustainable Development; and
- f) Criteria relating to Development in the Countryside.
- 2.78 Whilst the provision of a general principles planning policy is supported in broad terms, we believe that it is unsound in respect of its criteria (b) Criteria relating to Safeguarding Residential Amenity in that it fails to meet tests **CE4 (Coherence and Effectiveness)**. We expand below.
- 2.79 *Criterion (b)* relating to Safeguarding Residential Amenity requires under its part iii that:

### "New residential development shall be sited so as to maintain sufficient separation distance from existing or approved infrastructure likely to prejudice residential amenity or safety".

2.80 It is our position that this criterion of *Draft Policy GP1* fails to satisfy the test CE4 (Coherence and Effectiveness) in that the policy does not incorporate, an appropriate degree of flexibility in cases where new development cannot be sited to maintain sufficient separation distance from existing or approved infrastructure likely to prejudice residential amenity or safety.

#### Suggested Modifications

2.81 It is respectfully suggested that the use of the policy wording be revisited or clarified to state:

"New residential development shall be sited, <u>insofar as possible</u>, so as to maintain sufficient separation distance from existing or approved infrastructure likely to prejudice residential amenity or safety".

2.82 This proposed rewording would provide greater flexibility to this policy and would therefore be in line with soundness test **CE4 (Coherence and Effectiveness)**.

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#### Section 8.0 Building Sustainable Communities

#### Section 8.1 Housing (pages 168 - 193)

2.83 **Section 8.0** relates to building sustainable communities and it deals specifically with Housing under **Section 8.1**. It states:

"Creating sustainable communities is at the heart of both regional planning policy and Council's strategic plans. The provision of a range of well-designed house types and sizes and achieving a balance between affordable houses to rent, other types of tenure and market housing for sale are all considered as important factors in building sustainable communities. The LDP has an important role to perform by supporting the delivery of this mix of homes to meet the full range of housing needs and creating places that are safe, inclusive, well planned and where people want to live, work and play".

2.84 In achieving this, a number of operational policies relating to housing are set out. We comment on these where relevant below.

### <u>Draft Policy HOU1 Quality in New Residential Development in Settlements (pages 172 -</u> <u>174)</u>

- 2.85 **Draft Policy HOU1 Quality in New Residential Development in Settlements** is provided to ensure that housing development in the M&EABC area provides a quality residential development. It sets out a broad summary of criteria and requirements for residential development in settlements along supporting justification and amplification.
- 2.86 The requirements of the policy are reflective of, and consistent with, current operation policy under *PPS7 Quality Residential Developments* and its addenda and also current planning guidance in the form of Creating Places. As such, the inclusion of the policy is supported. Such an approach will ensure that any proposals being brought forward are of a sustainable nature and provide a high-quality residential development.
- 2.87 The policy states at page 173:

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"All proposals for residential development will be expected to meet the General Policy and accord with other provisions of the LDP. In addition, the guidance set out in Appendix D and in the 'Creating Places' design guide, alongside the principles outlined in 'Living Places – An Urban Stewardship and Design Guide' will be taken into account when assessing proposals. Any proposal for residential development which fails to produce an appropriate quality of design will not be permitted, even on land identified for residential use in the Local Development Plan".

- 2.88 *Creating Places Achieving Quality in Residential Developments* which is specifically referred to in the draft Policy is operational planning '*guidance*' and we welcome the consistency that will occur through the LDP taking account of this document and referencing it within its draft policy.
- 2.89 It is also noted that 'Appendix D Guidance for New Residential Development in Settlements' referred to within the policy provides a brief summary of the key elements of the existing guidance relating to the design of new residential developments in settlements but clarifies its position by confirming: "...the guidance published by DfI and previously referred to, should be consulted". Again, this refers to Creating Places, operational planning guidance and we welcome the consistency that will occur through the LDP taking account of this document.
- 2.90 We are therefore supportive of *Draft Policy HOU1* and of the opinion it be retained as part of any final Plan Strategy.

#### Policy HOU5 Affordable Housing in Settlements (Page 178)

2.91 This sets out M&EABCs policy for affordable housing and requires:

"Where a need for Affordable Housing is established by the Northern Ireland Housing Executive (NIHE) or other relevant housing authority through a Housing Needs Assessment; proposals for housing developments of 10 dwellings or more, or on a site of 0.2 hectare or more, will only be permitted subject to meeting the following quota:

• Main and Small Towns: 20% Affordable Housing

#### Draft Plan Strategy Representation – Lands at Martinstown



• Villages and Small Settlements: 10% Affordable Housing

All proposals for residential development will also be required to meet the General Policy and accord with other provisions of the LDP.

- 2.92 This draft policy on affordable housing fails to satisfy the tests of **C3 (Consistency)** and **CE4 (Coherence and Effectiveness)** in that they are not consistent with, nor do they incorporate, an appropriate degree of flexibility in line with the SPPS and RDS.
- 2.93 The SPPS which states at its **paragraph 6.143** that:

"The HNA/HMA undertaken by the Northern Ireland Housing Executive, or the relevant housing authority, will identify the range of specific housing needs, including social/affordable housing requirements. <u>The development plan process will be the primary vehicle to facilitate any identified need by zoning land or by indicating, through key site requirements, where a proportion of a site may be required for social/affordable housing. This will not preclude other sites coming forward through the development management process".</u>

[our underling emphasis]

2.94 The SPPS clearly indicates that affordable housing is a matter to be addressed through: "...*zoning land or by indicating, through key site requirements, where a proportion of a site may be required for social/affordable housing".* The zoning of land and key site requirements are all matters for the Local Policies Plan and not the Plan Strategy Document.

#### Suggested Modifications

- 2.95 **Draft Policy HOU5** must be removed from the LDP and the matter of allocation of affordable housing dealt with at the Local Policies Plan stage which will deal with the zoning of land and key site requirements, methods through which the SPPS identifies for identifying affordable housing.
- 2.96 Alternatively, if the above policy is to be kept within the DPSD it must only be as an interim measure until such times that the Local Policies Plan brings forward sites with Key Site Requirements addressing

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affordable housing needs. Similarly, if retained as an interim measure, such a policy must only apply where a need for social housing has been identified by the Northern Ireland Housing Executive.

2.97 In making such an amendment it would provide greater consistency and coherence to the LDP and bring it in line with soundness tests **C3 (Consistency)** and **CE4 (Coherence and Effectiveness)**.

#### Policy HOU6 Housing Mix (Unit Types and Sizes) (Page 180)

2.98 **Draft Policy HOUG** sets out M&EABCs strategic policy for housing mix (unit types and sizes) in new residential development. It states:

"Planning permission will be granted for new residential development of 25 or more units, or on sites of one hectare or more, where a mix of house types and sizes are provided. Provision should particularly be made for smaller homes to meet future household requirements in Mid and East Antrim. In smaller schemes the need to provide greater variety in type and size will be considered on its individual merits.

The required mix of house types and sizes will be negotiated with developers, taking account of the specific characteristics of the development, the site and its context and the nature of the local housing need. In locations where apartment development of 25 or more units is considered acceptable, variety in the size of units will be required.

All proposals for residential development will also be required to meet the General Policy and accord with other provisions of the LDP".

- 2.99 We support and welcome this policy in broad terms in that it will ensure a mix of housing types, tenures and sizes within settlements thereby helping to assist in delivering sustainable development proposals.
- 2.100 We are also supportive of the flexibility built into the draft policy in respect of smaller schemes, where it indicates: "*the need to provide greater variety in type and size will be considered on its individual merits"*.
- 2.101 We are therefore supportive of *Draft Policy HOU6* and of the opinion it be retained as part of any final Plan Strategy.
#### Draft Plan Strategy Representation – Lands at Martinstown



#### Section 8.2 Open Space, Sport and Leisure (Page 194)

2.102 *Section 8.2 Open Space, Sport and Leisure* (page 194) sets out operational policies relating to open space. We comment, where relevant, below.

#### Policy OSL2 Greenways (Page 196)

2.103 *Draft Policy OSL2* relates to Greenways and states:

"Development proposals that create, protect, extend, complement and/or improve regional or community greenways, including those designated in the LDP, will be granted planning permission where they meet the General Policy and accord with other provisions of the LDP. Where appropriate, development proposals shall include open space linkages to designated regional or community greenways.

Planning permission will not be granted for development either within or adjacent to a designated regional or community greenway which could prejudice the retention, enhancement or further development of an identified route".

2.104 It is noted that Paragraph 8.2.7 of the DPSD states:

"Details of the broad location of designated regional greenways are set out on the District Proposals Maps. Details of designated community greenways will be set out in the Local Policies Plan alongside more detailed proposals for regional greenways where finalised".

- 2.105 Within the Draft Plan Strategy District Proposals Map 1 it is noted that the proposed '*Regional Greenway Corridor'* which Martinstown is located on, is shown to broadly run adjacent to our client's lands. Again, we reserve the right to comment further on such matters at the Local Policies Plan stage once further detailed proposals and policies for greenways are formulated.
- 2.106 However at this stage we broadly support Draft Policy OSL2 and acknowledges the need for a policy to protect identified greenways. That said, and as previously identified, policy relating to greenways must not stifle future development or sterilise land from future development. We are conscious that a

### Draft Plan Strategy Representation – Lands at Martinstown



balance between protection of greenways and facilitating new development needs to be met. Again, as set out in relation to Social Objective d) of the LPD, our client's lands are well placed in relation to the broadly identified 'Regional Greenway Corridor' and, if developed for residential or other purposes, can provide linkages to this corridor, in line with proposed **Draft Policy OSL2**.

#### Policy OSL4 Public Open Space in New Residential Development (page 198)

2.107 This sets out M&EABC's policy for provision of public open space in new residential developments. It states:

"Council will only permit proposals for new residential development of 25 or more units, or on sites of one hectare or more, where public open space is provided as an integral part of the development. In smaller residential schemes the need to provide public open space will be considered on its individual merits.

An exception to the requirement of providing public open space will be permitted in the case of apartment developments or specialised housing where a reasonable level of private communal open space is being provided.

An exception will also be considered in cases where residential development is designed to integrate with and make use of adjoining public open space.

Where the provision of public open space is required under this policy, the precise amount, location, type and design of such provision will be negotiated with applicants taking account of the specific characteristics of the development, the site and its context and having regard to the following:

- a) A normal expectation will be at least 10% of the total site area or 15% where the site is 10 hectares or more.
- *b) Provision at a rate less than the above requirements may be acceptable where the residential development:*
- is located within a town centre; or

#### Draft Plan Strategy Representation – Lands at Martinstown



- is close to and would benefit from direct and unobstructed access to areas of existing public open space; or
- provides accommodation for special groups, such as the elderly or people with disabilities.

For residential developments of 100 units of more, or for development sites of five hectares or more, an equipped children's play area will be required as an integral part of the development, unless otherwise specified through key site requirements on sites zoned in the Local Policies Plan. Until the adoption of the Local Policies Plan, an exception to this requirement will be considered where an equipped children's play area exists within reasonable walking distance (generally around 400 metres) of the majority of the units within the development scheme.

Public open space required by this policy will be expected to meet the General Policy criteria, accord with other provisions of the LDP and to meet all the following criteria:

- *i) it is designed in a comprehensive and linked way as an integral part of the development;*
- *ii) it is of demonstrable recreational or amenity value;*
- *iii) it is designed, wherever possible, to be multi-functional; and*
- *iv) it provides easy and safe access for the residents of the dwellings that it is designed to serve.*

#### Management and Maintenance

Planning permission will not be granted until the developer has satisfied Council that suitable arrangements will be put in place for the future management and maintenance in perpetuity of areas of public open space required under this policy".

### Draft Plan Strategy Representation – Lands at Martinstown



- 2.108 We are supportive of this wording given it is consistent and in line with current guidance and planning policy on such matters.
- 2.109 We welcome the consistency of the proposed draft operational policy with current planning policy. It should be retained as part of any final Plan Strategy.

### Draft Plan Strategy Representation – Lands at Martinstown



#### 3.0 Conclusions

3.1 In accordance with **Section 10(7)** of **The Planning Act (Northern Ireland) 2011**, should M&EABC submit the DPSD in its current form to the Department for Infrastructure for an Independent Examination, we request that we are given the opportunity on behalf of our client to appear before and be heard at the examination by way of an **Oral Hearing**.

WYG Planning on behalf of **Second Second** December 2019

# Draft Plan Strategy Representation – Lands at Martinstown



Appendix 1



#### Legend

Settlement Development Limit for Martinstown as defined in the Ballymena Area Plan Alteration  $\ensuremath{\mathsf{No.1}}$ 

Parcel 1 - 0.7Ha of land between Lisnamanny Road and Glenravel Road
Parcel 2 - 1Ha of land between between Glenravel Road and Martinstown Road
Parcel 1 - 3.4Ha of land between between Glenravel Road and Martinstown Road



Appendix 1 – Lands at Martinstown

### Draft Plan Strategy Representation – Lands at Martinstown



Appendix 2



### Draft Plan Strategy Representation – Lands at Martinstown



Appendix 3





Draft Plan Strategy Representation – Lands at Martinstown



Appendix 4

	Official Use OnIMEA-DPS-079						
Form PAN1	Reference No.:						
	Associate Application No.:						
	Registration date:						
Proposal of A	Mid & East Anore, Borough Council Planning RECEIVED						
Planning Act (N	orthern Ireland) 2011 3 1 MAY 2019						
Planning (General Development Pr	orthern Ireland) 2011 J 1 MAY 2019 rocedure) Order (Northern Ireland) 2015						
To be completed for all developments	within the major category of development						

Please note that when you submit this form the information, including plans, maps and drawings, will appear on the Planning Register which is publicly available and, along with other associated documentation (with the exception of personal telephone numbers, email addresses or sensitive personal data), will also be published on the internet on the Public Access site (www.planningni.gov.uk/public-access-info). The Department for Infrastructure and the 11 Councils will process your information in line with the General Data Protection Regulations (GDPR) requirements. A copy of the full Privacy Statement is available at www.infrastructure-ni.gov.uk/dfi-privacy. To request a hard copy, please contact the relevant Data Protection Officer as listed in the statement.

1a. Applicant's name and address

**1b. Agent's** name and address (if applicable)

Name:	Mary Queen of Peace Primary School	Name:	Andrew English		
Address:	116 Dunaghy Wood, Glenravel	Address:	Hamilton Architects, Hamilton House,		
			3 Joy Street		
Town:	Ballymena	Town:	Belfast		
Postcode:	BT43 6QJ	Postcode:	BT2 8LE		
Tel:		Tel:	028 9033 4250		
E-mail:		E-mail:	andrew.english@hamiltonarchitects.co.uk		

2. Address or Location of Proposed Development Please state the postal address of the

prospective development site. If there is no postal address, describe its location. Please outline the site on an OS base plan and attach it to this completed notice.

116 Dunaghy Wood, Glenravel, BT43 6QJ

Please also find attached (00) 01 Site Location Map

3. What is the area of the site in hectares?

1.84

**4. Description of Proposed Development** Please describe the development to be carried out, outlining its characteristics. Please also enclose appropriate drawings, including: plan, elevations and site layout of the proposal.

Construction of new build 9 classroom, 1,700sqm, 250pupil Primary School, for the amalgamation of two existing schools and associated works to the proposed school site.

5. What is the total gross floorspace of the proposed development?  $|_{1}$ 

1,700sqm

6. If the proposed development includes a renewable energy project, what is the total amount of power (in kilowatts or megawatts) expected to be generated per year?

7. Which type of planning perr	nission does this Proposa	of Application Notice relate to?
(Please tick)		••

Full planning permission

<u> </u>		
Outline	planning	permission

# 8. Has a determination been made as to whether the proposed development would be of Regional Significance?

Yes

(Please enclose a copy of the determination made under Section 26 of the Planning Act (NI) 2011)

### 9. Has an Environmental Impact Assessment determination been made?



(Please enclose a copy of the determination made under Part 2 of the Planning [Environmental Impact Assessment] Regulations [NI] 2015)

#### 10. Please give details of proposed consultation

Proposed public event	Venue	Date and Time
01	St Marys Parish Centre, Glenravel	Wednesay 19.06.19 @ 7pm
02	St Marys Parish Centre, Glenravel	Wednesda 18.09.19 @ 7pm
Name of publication(s) used:		
Ballymena Guardian and Ballyme	na & Antrim Times	
Proposed newspaper advert d	ate(s):	
10th/11th June 2019 and 9th/10th	September 2019.	
Please specify details of any o	ther consultation methods including distance	from site for notifying
and with whom):	00m, 200m etc) and method of notification (p	please include date, time
,	vith notification of PAN events and met with the o	where of all properties which
share a boundary with the application	tion site including those which would share a bou	ndary but for the road.
	-	,
	ethods (such as leaflets, posters, etc):	
Notice to be published on official S residents.	chool Facebook page & Website, Public event le	aflets distributed to local

No

No

#### **11. Please state which other parties have received a copy of this Proposal of Application Notice** (Please continue on a separate sheet if necessary)

	1
Elected member(s) for District Electoral Area	Date notice served
Other	Date notice served
	Date notice served

#### 12. Council Employee / Elected Member Interest

Are you / the applicant / applicant's spouse or partner, a member of staff within the council or an elected member of the council?

Or are you / the applicant / the applicant's spouse or partner, a relative of a member of staff in the council or an elected member of the council or their spouse or partner?

Yes	

Yes

**\_\_\_\_** 

lf	you hav	e answered	yes,	please	provide	details	(name,	relationship	and	role	):
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#### 13. Declaration

Signature:	• 1
Print name:	Andrew English
Date:	31.05.19

**PLEASE NOTE:** A planning application for this development cannot be submitted less than 12 weeks from the date the Proposal of Application Notice is received and without the statutory requirements having been undertaken. The application must be accompanied by the Pre-Application Consultation report.

We will respond within 21 days of receiving the Notice. We will confirm whether the proposed preapplication community consultation is satisfactory, or if additional notification and consultation is required. The minimum statutory consultation activity includes holding one public event and its advertisement in a local paper. We also require this Notice to be sent to local councillors for the District Electoral Area in which the proposed development is situated, and evidence of additional publicity of the event.



Draft Plan Strategy Representation – Lands at Martinstown



Appendix 5

							Append	ix 5							
Α	В	С	D	E	F	G	н	I	J	К	L	М	N	0	Р
Settlement	Settlement Households in 2011	% per Households in LDP Area at 2011	HGI Allocation of 7477 based on % household		Difference between HEF Adjustment Figure & HGI Allocation of 7477 based on % household (D - C)	Completions 2012-18 (6No. Years)	HGI Allocation affter HEF Adjustment & Completions (E - G)	Live Planning Permissions	Plan Strategy - Difference in Allocation & Live Planning Permissions (I - H)	Build rate per annum (between 2012-2018 - 6No. Years) (G ÷ 6No. Years)		Difference between Allocation and Build Rate to 2030 (H - L)	% Build Rate by settlement		Difference in Revised Allocation by Settlement Build Rate & Live Planning Permissions (I - O)
Main Town Total	31793	62	4636												
	7600														
Small Towns Total	7600	15	1122												
Kells - Connor	808	1.7	127	135	8	63	72	89	17	11	116	-44	29.3	123	-34
Portglenone	498	1.04	78	81	3	36	45	42	-3	6	66	-21	16.7	70	-28
Martinstown	108	0.23	17	16	-1	32	-16	9	25	5	59	-75	14.9	<u>63</u>	-54
Ballycarry	536	1.12	84	85	1	27	58	173	115	5	50	9	12.6	53	120
Ballystruder	389	0.82	61	62	1	22	40	34	-6	4	40	0	10.2	43	-9
Cargan	223	0.47	35	32	-3	16	16	6	-10	3	29	-13	7.4	31	-25
Carnlough	563	1.18	88	93	5	10	83	56	-27	2	18	65	4.7	20	36
Ballygally	333	0.7	52	45	-7	7	38	1	-37	1	13	25	3.3	14	-13
Glenarm	242	0.51	38	35	-3	1	34	3	-31	0	2	32	0.5	2	1
Glynn	267	0.56	42	40	-2	1	39	0	-39	0	2	37	0.5	2	-2
Clough	90	0.19	14	12	-2	0	12	16	4	0	0	12	0.0	0	16
Villages Total	4057	8.5	637	636		215	421	429		36	394	27	100	421	
				Note * figures may	y be rounded and therefore r	may not add exactly.									
Small Settlments Total	1001	2.5	]												
Countryside Total	9863	12	]												
Overall Total	54314	100	7477												

Draft Plan Strategy Representation – Lands at Martinstown



Appendix 6







673UFH VUL L'LWDOOREH HARH DUWKWDU HARUDBALFV & \$UEX/6 \$5 65 \$UF37,1 DOG WKH,16 &HU \$#FOLW/ k &UR22 &SULJKW DWDEDVH 5UKW k DIGODORH 6UVH ,UHO DOG 650WLDO,1 LV D VHUYLFH SUR/LGHG E

HE\$\$\$%LOGHUIRU\$JF;6

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KUREQKREULKWDWDEDXH5.KW KUGDDOFHOUYH, UHO DOG 6DWLDO 1 LVDVHUYLFHSURYLGHGEEDIGDDOFHOUYHR RUWKHUQ, UHO DOQE\_L'LWDOO REH DFURARW\_

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Draft Plan Strategy Representation – Lands at Martinstown



Appendix 7



#### Mid and East Antrim Borough Council Local Development Plan 2030 Draft Plan Strategy District Proposals Map 1 For information only:





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