Local Development Plan 2030

Technical Supplement 3 Housing

September 2019



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Contents

List of Figures and Tables

1.0	Introduction	4
	Purpose of this document	4
	Planning and Housing	4
2.0	Policy Context	5
_	Regional Policy Context	5
	Local Policy Context	8
3.0	Housing Profile	13
4.0	Survey Work and Studies Informing the Evidence Base for Housing	17
5.0	Preferred Options Paper	21
6.0	Consultee and Councillor Engagement	23
7.0	Draft Plan Strategy Policy Approach	24
	Strategic Housing Allocation	24
	Management of Housing Supply	33
	Housing Strategic Subject Policies	39
8.0	Soundness	42
	Soundness endices	42 43
Арро		
Appo APPI APPI Table	endices	
Appo APPI Table Table Figur	endices ENDIX A Glossary ENDIX B e B1 Breakdown of Mid and East Antrim Housing Stock (2011)	
Appo APPI Tablo Tablo Figur Figur	endices ENDIX A Glossary ENDIX B e B1 Breakdown of Mid and East Antrim Housing Stock (2011) e B2 Breakdown of Mid and East Antrim Housing Stock (April 2018) ENDIX C e C1 Social rented housing waiting list trends in Mid and East Antrim e C2 Five year social rented housing need trend in Mid and East Antrim	
Appo APPI Tablo Tablo Figur Figur Figur APPI APPI	endices ENDIX A Glossary ENDIX B e B1 Breakdown of Mid and East Antrim Housing Stock (2011) e B2 Breakdown of Mid and East Antrim Housing Stock (April 2018) ENDIX C e C1 Social rented housing waiting list trends in Mid and East Antrim e C2 Five year social rented housing need trend in Mid and East Antrim e C3 Social rented housing started and completed – five year trend	
App APPI Table Table Figur Figur Figur Figur Figur APPI Table Table	endices ENDIX A Glossary ENDIX B a B1 Breakdown of Mid and East Antrim Housing Stock (2011) b B2 Breakdown of Mid and East Antrim Housing Stock (April 2018) ENDIX C e C1 Social rented housing waiting list trends in Mid and East Antrim e C2 Five year social rented housing need trend in Mid and East Antrim e C3 Social rented housing started and completed – five year trend ENDIX D Settlement populations (2011) ENDIX E Housing Evaluation Framework (HEF) Methodology e E1 Application of the Housing Evaluation Framework e 23 Breakdown of Housing Evaluation Framework Scores	43

APPENDIX H Evolution of relevant draft Plan Strategy policy

APPENDIX I Urban Capacity Study (see separate document)

Housing

List of Figures and Tables

Figures

Figure 7.1 Housing Allocation figures following application of HEF

- Figure 7.2 Housing unit completions in Settlements and the Countryside 2012-2018
- Figure 7.3 Urban and Rural housing completions 2012-2018 in comparison to yearly average 2012-2030 HGI
- **Figure 7.4** Notional Housing Allocation 2018-2030 in relation to Existing Approvals/Potential Urban Capacity and Windfall sites in main towns and potential in Urban fringe (Whiteland and Undeveloped and Uncommitted extant Zoned housing sites) and current projected Social Rented Need until 2030
- Figure 7.5 Notional Housing Allocation 2018-2030 in relation to Existing Approvals/Potential Urban Capacity and Windfall sites in small towns and potential in Urban fringe (Whiteland and Undeveloped and Uncommitted extant Zoned housing sites) and current projected Social Rented Need until 2030
- **Figure 7.6** 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

Tables

Table 2.1 Neighbouring Councils Position on Housing

- Table 3.1 Household Projections by Household Type 2016 and 2030
- Table 3.2 Social Rented Housing Need for Mid and East Antrim Borough Council by Settlement

Table 4.1 Housing Monitor Summary

Table 4.2 New and replacement dwelling completions in open countryside 1 April 2012 - 31 March 2018

Table 5.1 POP housing allocation figures

Table 7.1 Housing Allocation to Settlement tiers and the Countryside

- Table 7.2 Housing Allocation between Settlements in each Tier
- Table 7.3 RDS Housing Evaluation Framework

 Table 7.4 Urban and Rural housing completions 2012-2018 in comparison to yearly average 2012-2030 HGI

 Table 7.5 Housing Allocation 2018-2030 and Live Residential Planning Permission in Settlements at April 2018

 Table 8.1 Consideration of Soundness

1.0 Introduction

Purpose of this document

- 1.1 This technical supplement brings together the evidence base that has been used to inform the preparation of the Mid and East Antrim Local Development Plan (LDP) 2030 draft Plan Strategy. It is one of a suite of topic based technical supplements that should be read alongside the draft Plan Strategy to understand the rationale and justification for the policies proposed within it.
- 1.2 This technical supplement builds upon and updates LDP Position Paper 2 Housing and Settlement and Position Paper 13 Housing Allocation which provided baseline information on housing and options for housing allocation and formed part of the evidence base for the Preferred Options Paper (POP). It provides an overview of the regional and local policy context and the housing profile of Mid and East Antrim. In addition, it demonstrates how the various strands of the evidence base have been considered in the formulation of strategic spatial proposal/policy SGS3 Strategic Allocation of Housing to Settlements, SGS4 Protection of Zoned Housing Land and SGS5 Management of Housing Supply, strategic policy CS1 Sustainable Development in the Countryside and the 16 strategic subject policies relating to housing (Policy HOU1 HOU16) in the draft Plan Strategy, including responses to the POP and ongoing consultee and councillor engagement.

Planning and Housing

- 1.3 Planning for future housing growth across the Borough is one of the core functions of the Local Development Plan as the provision of housing is key to population growth which in turn provides the critical mass to support the provision of infrastructure and services such as health, education and community facilities.
- 1.4 Housing is recognised as a key driver of physical, economic and social change in both urban and rural areas. In furthering sustainable development it is important to manage housing growth in a sustainable way. Regional planning policies places emphasis on the importance of the relationship between the location of housing relative to jobs, services and infrastructure and generally seeks to ensure that housing is accessible to employment and core services. The regional direction for housing is also to avoid adverse impacts on the natural or historic environment and to ensure that it does not take place in areas posing significant risk to people and property. This will be particularly important in the countryside where through the LDP a balanced approach will be taken between the protection of the environment from inappropriate development and sustaining rural communities.
- 1.5 The LDP has an important role to proactively facilitate the delivery of land for homes which meet the full range of anticipated housing needs overt the Plan period. It also provides a policy approach to help deliver good quality housing in a range of sizes and tenures that strengthens community cohesion and supports the creation of more balanced communities. Balanced communities can contribute positively to the creation and enhancement of shared spaces and vice-versa. Accordingly, housing can be seen as an important part of the delivery mechanism in regard to the core planning principles of the Strategic Planning Policy Statement (SPPS)
- 1.6 The delivery of sufficient and suitable housing through the Local Development Plan will also assist our Community Plan in seeking to fulfil its vision to "*improve the quality of life for all*".

2.0 Policy Context

Regional Policy Context

Draft Programme for Government 2016 - 2021

2.1 At the highest level, the NI Executive has set out its priorities in the draft Programme for Government (dPfG) 2016-2021. Its overall purpose is to improve wellbeing for all, by tackling disadvantage, and driving economic growth. It sets out 14 strategic outcomes some of which have implications for the delivery of housing, and of particular relevance is Outcome 2 (We live and work sustainably - protecting the environment) and Outcome 12 (We have created a place where people want to live and work, to visit and invest). Linked to the Programme for Government, good quality housing can help reduce fuel poverty, promote the use of renewable energy and assist economic growth.

Regional Development Strategy 2035 (RDS)

- 2.2 The RDS is a spatial strategy and provides an overarching strategic planning framework to facilitate and guide the public and private sectors. The RDS provides strategic guidance through Spatial Framework Guidance (SFG) and Regional Guidance (RG) under the three sustainable development themes Economy, Society and Environment. Under the theme of Society the RDS aims to build sustainable communities and describes sustainable communities as *"places where people want to live, work and play, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well-planned, built and run, and offer equality of opportunity and good services for all".*
- 2.3 The particular role of housing in helping to build sustainable communities is evident in RG6 which seeks to encourage mixed housing development in a range of sizes and tenures, within neighbourhoods accommodating diverse populations. Housing also has a role in supporting urban and rural renaissance (RG8), for example as a key component of regeneration in areas of social need.
- 2.4 The RDS also sets out broad policy directions for the spatial distribution of housing growth in a sustainable manner. Generally this means providing additional housing in the hubs (SFG12) and sustaining rural communities living in smaller settlements (i.e. smaller towns and villages) and the open countryside (SFG13). While the emphasis in the RDS is on directing most housing growth to the larger urban areas (or hubs), it also recognises the importance of supporting rural communities so that they remain vibrant and sustainable.
- 2.5 The RDS Regional Guidance (RG8) recognises the need to *Manage housing growth to achieve sustainable patterns of residential development* including promoting more sustainable housing development within existing urban areas, ensuring an adequate an available supply of quality housing to meet the needs of everyone and using a broad evaluation framework to assist judgements on the allocation of housing growth.
- 2.6 In seeking to meet this objective, the RDS sets a regional target of 60% of new housing to be located in appropriate 'brownfield' sites (see Glossary) within the urban footprints (see Glossary) of settlements greater than 5,000 population. In Mid and East Antrim, there are four settlements which have a population greater than 5,000 Ballymena (29,467), Carrickfergus (27,903), Larne (18,705) and Greenisland (5,484).
- 2.7 The RDS provides an estimate of the new dwelling requirement for the Borough as a guide for the preparation of the LDP through a Housing Growth Indicator. In April 2016, the Department for Infrastructure (DfI) published a revised HGI figure of 5,400 dwellings for Mid and East Antrim Borough for the period 2012-2025, using 2012-based household projections. Projecting the figure of 5,400 on a pro rata basis to 2030 for the period 2012-2030 gives a figure of 7,477 (an annualised total of 415 dwellings).

Strategic Planning Policy Statement (SPPS)

- 2.8 The SPPS was published by the former Department of Environment (DOE) in September 2015. It aims to further sustainable development and improve wellbeing through the planning system. The SPPS underpins the regional guidelines in the RDS by promoting sustainable housing development.
- 2.9 The SPPS recognises that good quality housing is a fundamental human need that plays a significant role in shaping our lives and our communities. The SPPS states that the planning system can play a positive and supporting role in the delivery of homes to meet the full range of housing needs of society, within the wider framework of sustainable development. The policy approach requires LDPs to:
 - facilitate an adequate and available supply of quality housing to meet the needs of everyone;
 - promote more sustainable housing development within existing urban areas; and
 - provide mixed housing development with homes in a range of sizes and tenures.
- 2.10 This approach to housing which has been followed in the draft Plan Strategy, includes encouraging more housing within existing urban areas, promoting good design and achieving balanced communities.
- 2.11 The SPPS sets out four broad outputs that the LDP Housing Strategy and accompanying policies and proposals should deliver within settlements, tailored to the specific circumstances of the plan area. These are sustainable forms of development, good design, increased housing density without town cramming and balanced communities.
- 2.12 The SPPS requires the LDP to identify and zone sites in larger settlements that are sufficient to meet general and special housing need over the Plan period. LDPs are also required to provide for a managed release of housing land, in line with a 'plan, monitor and manage' approach to ensure that, as a minimum, a five year supply of available land for housing is maintained. This includes the adoption of a sequential approach for the release of housing land within settlements over 5,000 population in the interest of sustainable development and achieving compact urban forms. The SPPS indicates that housing allocations in LDPs should be informed by:
 - RDS Housing Growth Indicators (HGIs);
 - Use of the RDS housing evaluation framework;
 - Allowance for existing commitments;
 - Urban capacity studies;
 - Allowance for windfall housing;
 - Application of a sequential approach and identification of suitable sites;
 - Housing Needs Assessment (HNA)/Housing Market Analysis (HMA); and
 - Transport Assessments.

In addition the SPPS sets out a list of measures that should be contained in LDPs to achieve these aims and policy direction.

2.13 The overall aim of the SPPS in regard to the countryside is to manage development in a manner which strikes a balance between protection of the environment from inappropriate development, while supporting and sustaining rural communities consistent with the RDS. It requires the LDP to bring forward a strategy for sustainable development in the countryside underpinned by appropriate policies for housing and other forms of development. Broadly, the policy approach expressed by the SPPS is to cluster, consolidate, and group new development with existing established buildings and promote the re-use of previously used buildings.

Planning Policy Statements and Supplementary Guidance

Planning Policy Statement 7 Quality Residential Environments (PPS 7) (2001)

- 2.14 This PPS sets out the DfI's planning policies for achieving quality in new residential development and advises on the treatment of this issue in development plans. The main objectives of PPS 7 are set out below:
 - To promote an integrated approach to achieving sustainable and quality residential environments.
 - To promote quality residential development that:
 - creates places for people which are attractive, locally distinctive and appropriate to their surroundings, safe, convenient, adaptable and easy to maintain;
 - respects and enhances features of value and local character and promotes biodiversity; and
 - reduces reliance on the private car, supports movement by pedestrians and cyclists, provides adequate and convenient access to public transport and connects well with the wider locality.
 - To promote the comprehensive planning and development of residential areas and ensure that adequate information accompanies planning applications which will enable the delivery of an improved design quality.
 - To ensure that adequate provision is made for infrastructure and appropriate local neighbourhood facilities as an integral part of residential development.

Planning Policy Statement 7 (Addendum): Residential Extensions and Alterations (2008)

2.15 This document, designed to be read in conjunction with PPS 7 'Quality Residential Environments', sets out additional planning policy for the extension and/or alteration of a dwellinghouse or flat, including those in multiple occupancy. It seeks to promote high quality design in residential extensions and alterations as well as ensuring the character of the original property and the local area are respected. The policy also seeks to ensure that neighbouring residential amenity is protected.

Planning Policy Statement 7 (Addendum): Safeguarding the Character of Established Residential Areas' (2010)

2.16 This document, designed to be read in conjunction with the preceding policy statements, provides additional planning policy provisions on the protection of local character, environmental quality and residential amenity within established residential areas, villages, and smaller settlements. It also sets out policy on the conversion of existing buildings to flats or apartments. In addition the addendum contains policy to promote the greater use of permeable paving within new residential developments to help reduce the risk of flooding from surface water run-off. The key consideration is to ensure that new residential schemes are sensitive in design terms to people living in existing neighbourhoods and are in harmony with the local character of established residential areas, villages and smaller settlements.

Planning Policy Statement 12 (PPS 12) (2005)

- 2.17 PPS 12 has been prepared to assist in the implementation of the RDS in regard to housing by managing future housing growth and distribution, supporting urban renaissance and achieving balanced communities. It sets regional policy objectives underpinning the RDS and equally relevant to local development plans, in terms of:
 - managing housing needs in response to changing need;
 - directing and managing growth to achieve more sustainable patterns of residential development;
 - promoting a drive for more housing within urban areas;
 - encouraging increased density of urban housing appropriate to the scale and design of cities and towns of Northern Ireland; and
 - encouraging the development of balanced local communities.

2.18 The policy approach is to facilitate an adequate and available supply of quality housing to meet the needs of everyone; promote more sustainable housing development within existing urban areas; and the provision of mixed housing development in a range of sizes and tenures. This approach to housing supports the need to maximise the use of existing infrastructure and services, and the creation of more balanced sustainable communities.

Policy HS 3 (Amended) Travellers Accommodation (PPS12) (2013)

2.19 Travellers have distinctive needs which are assessed as part of the local housing needs assessment undertaken by the Northern Ireland Housing Executive (NIHE). Where a need is identified and a development plan is under preparation, the plan should identify a suitable site(s).

Planning Policy Statement 21 Sustainable Development in the Countryside (PPS 21) (2010)

2.20 This document sets out planning policies for development in the countryside i.e. outside of settlement limits. It seeks to strike a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities. It sets out a range of residential and non-residential developments which are in principle considered to be acceptable in the countryside and that will contribute to the aims of sustainable development.

2.21 Supplementary Planning Guidance is contained in:

- **Creating Places Achieving Quality in Residential Development (2000)**. It is the principle guide for use by prospective developers in the design of all new housing areas.
- **DCAN 8: Housing in Existing Urban Areas (2002)**, will also be material to the determination of planning applications for small unit housing within existing urban areas.
- Living Places: An Urban Stewardship and Design Guide for NI (2014) sets out the key principles behind good place making. It seeks to inform and inspire all those involved in the process of managing and making urban places.
- **Building on Tradition A Design Guide for the Northern Ireland Countryside (2012)** promotes quality and sustainable building design in Northern Ireland's countryside.

Local Policy Context

Legacy Area Plans

- 2.22 The existing development or area plans that apply to Mid and East Antrim Borough are:
 - Ballymena Area Plan 1986-2001, adopted in 1989
 - Larne Area Plan 2010, adopted in 1998
 - Carrickfergus Area Plan 2001, adopted in March 2000
- 2.23 The draft Plan Strategy (para 2.2.3) refers to the somewhat complex situation in regard to the status of the Belfast Metropolitan Area Plan 2015 (BMAP) which included the former Carrickfergus Borough Council area. Whilst the Carrickfergus Area Plan 2001 remains the extant statutory plan for this area, the draft BMAP (2004) as the most recent expression of local planning policy, has also been taken into account in developing the draft Plan Strategy.
- 2.24 Whilst the draft Plan Strategy has taken account of the existing Area Plans, it has also been necessary to consider their longevity and the fact that all pre-date even the original version of the Regional Development Strategy, published in 2001. They also pre-date the SPPS and all the Planning Policy Statements referred to above.

Ballymena Area Plan 1986 – 2001

- 2.25 The Ballymena Area Plan 1986-2001 estimated that 4,500 dwellings would be required over the plan period. The plan directed the majority of housing to Ballymena town by zoning 150 hectares of land for housing to provide over 3,000 units and included a surplus supply in order to provide a degree of flexibility and choice. The Department avoided zoning large tracts of land in favour of a greater number of smaller sites mainly spread around the periphery of the town in areas such as Galgorm, Gracehill, Ballee, Carniny and Dunclug. The LDP Undeveloped Zoned Land Study 2018 indicated that approximately 75% of this zoned housing land has, for the most part, been developed for housing or is committed for housing development.
- 2.26 In the villages, land was not zoned for specific purposes, however sufficient land was included within development limits to allow each village to fulfil its role in the settlement strategy by provide adequate opportunities for housing development. On the proposal maps for the villages of Ahoghill, Broughshane, Cullybackey, Kells/Connor and Portglenone land suitable for housing was identified. The uptake of land identified for housing within the villages has been greater with almost 90% of the land being developed or committed for housing.

Larne Area Plan 2010

- 2.27 The Larne Area Plan 2010 estimated that some 2,370 new dwellings would be required in the Larne Borough over the Plan period. The majority (60%) of Larne Borough's population lived in Larne town, where it was anticipated that much of the demand for new housing would be met. Accordingly, just under 150 hectares of land was zoned for housing in Larne town. Housing policies were aimed at ensuring that an adequate and continuous supply of housing land was available within the urban areas of the Borough providing a range of housing opportunities to meet the needs of the community. The LDP Undeveloped Zoned Land Study 2018 indicated that approximately 66% of this zoned housing land has, for the most part, been developed for housing or is committed for housing development.
- 2.28 The Plan designated six villages and 18 small settlements. Within the villages and small settlements, land was not generally zoned for housing purposes, but was retained within settlement development limits as un-zoned or 'white' land. Within the settlement limits housing development was normally acceptable subject to meeting the relevant planning policy and technical requirements for the particular site. While land may have been acceptable for a variety of uses, it was anticipated that green field sites on the edge of the built-up area of such settlements would predominantly be given over to housing.

Carrickfergus Area Plan 2001/draft BMAP (2004) in combination with the Planning Appeals Commission Inquiry report

- 2.29 The Carrickfergus Area Plan 2001 included the settlements of Carrickfergus, Greenisland, Whitehead, Trooperslane and Knocknagulliagh. The Plan Strategy, underpinned by the principle of sustainable development, was for Carrickfergus town to be the focus for most new growth, while development in the countryside was to be kept to a minimum. With 70% of the Borough's population, Carrickfergus town was the focus for provision of new dwellings over the plan period. Some 95 hectares of land for housing was zoned within the town. Taken together Greenisland and Whitehead accounted for approximately 26% of the Borough's population. CAP 2001 zoned 26.6 hectares of land for housing in Greenisland but did not indicate specific sites for residential development in Whitehead, as there were limited development opportunities owing to infrastructure and topography constraints. The two small settlements of Trooperslane and Knocknaguillagh accommodated local communities and only small-scale development opportunities were provided.
- 2.30 Draft BMAP (2004) zoned a total of 181 hectares of housing land across the Carrickfergus Borough. Of this, 131 hectares were allocated to Carrickfergus Town, 41 hectares to Greenisland and nine hectares to Whitehead. The LDP 2018 Undeveloped Zoned Land Study 2018 indicated that in Carrickfergus 69% of the

land zoned for housing in draft BMAP has for the most part, been developed for housing or is committed for housing development. In Greenisland just under 80% has been developed or is committed for housing and in Whitehead the figure is slightly higher at 83%. There were some slight differences in relation to land zoned for housing under draft BMAP (2004) and BMAP (2015) however the differences relate to lands that are now complete and therefore have no bearing on the identification of undeveloped land.

Mid and East Antrim Borough Council Corporate Plan

- 2.31 Our Corporate Plan sets out the Council's vision, themes and objectives that will shape our work and the services that we provide up until 2023. The aim of the Corporate Plan is to deliver the same long term vision and outcomes for the Borough that are set out in the Community Plan. The key objectives of the Plan are identified under five main themes all of which fall under the wider strategic theme to be a high performing council:
 - Sustainable jobs and tourism.
 - Good health and wellbeing.
 - Learning for life.
 - Community safety and cohesion.
 - Our environment.

Mid and East Antrim Borough Council Community Plan

- 2.32 Our Community Plan 'Putting People First' was published in April 2017 and covers the period from 2017 to 2032. The vision of the Community Plan is that: "*Mid and East Antrim will be a strong, safe and inclusive community, where people work together to improve the quality of life for all*". The strategic priorities set out in the Community Plan have been identified through joint working with 12 statutory partner organisations and informed by extensive consultation with the public and community and stakeholder groups. The strategic priorities are developed around the five key themes that now inform the Corporate Plan.
- 2.33 The Local Government Act (Northern Ireland) 2014 sets out a statutory link between the Community Plan and the LDP, in that the preparation of the LDP must take account of the Community Plan. The strategic priorities of our Community Plan have therefore been taken into consideration in the preparation of the draft Plan Strategy.
- 2.34 Good housing can contribute to achieving many of the Community Plan outcomes. It can assist with health and wellbeing, regeneration, community cohesion and safe neighbourhoods. The delivery of housing through the LDP is recognised as one of the key vehicles to achieving the outcomes of the Community Plan.

Cross Boundary Policy Context

- 2.35 In developing our Strategic Housing Allocation Strategy and housing policies account has been taken of the local policy context as it relates to the emerging LDP's of our three neighbouring councils:
 - Antrim and Newtownabbey Borough Council;
 - Causeway Coast and Glens Borough Council Belfast City Council; and
 - Mid Ulster District Council.
- 2.36 Neighbouring Council's Preferred Options Papers, supporting evidence base and published draft Plan Strategies have been taken account of, as these are regarded as the most relevant documents when considering cross-boundary issues. Because Carrickfergus falls within the Belfast Metropolitan Area, there has also been engagement with Belfast City Council and other councils in the Metropolitan area.

Table 2.1 Neighbouring Councils Position on Housing

Neighbouring Council	Position
Antrim and Newtownabbey Borough Council	 ANBC published its draft Plan Strategy in June 2019. ANBC relevant policies: Strategic Policy 4 Homes covers housing growth and allocation, identification of land for housing, affordable homes and quality and standards, DM17 Homes in Settlements, DM18 Homes in the Countryside, PDM19 Residential caravans and mobile homes, DM20 Traveller Accommodation, DM21 Specialist Residential Accommodation and DM22 Residential Extensions and Alterations. The draft Plan Strategy identifies the need for 9,750 dwellings over the plan period (2015-2030) and distributes the largest growth allocation to Metropolitan Newtownabbey, Antrim and Ballyclare which are the top three tiers of the settlement hierarchy.
Causeway Coast and Glens Borough Council	CCGBC published its POP in June 2018. CCGBC relevant preferred option: Key Issue HS3: Approach to the Split between Urban and Rural Housing. The document also examines issues around Social Housing Distribution, Provision of Social and Affordable Housing and Private amenity space in New Residential development. The POP estimates that 9,270 houses will be required over the plan period. The Council recognise that 'there is the potential for an additional 16,000 units in the borough' based on the lands zoned for development in settlements in the Northern Area Plan and the present rural planning policy regime under PPS 21. This is well over the HGI allocation of 9,270. The preferred option is to review the existing policy framework and it is considered that this option will enable the distribution of housing to more sustainable locations in line with the RDS.
Mid Ulster District Council	Mid Ulster published its draft Plan Strategy in February 2019. Mid Ulster relevant policies: HOU1 Protection of land zoned for housing, HOU2 Quality Residential Development, HOU3 Residential Extensions, HOU4 Conversion of existing buildings to flats, apartments or houses in multiple occupation, TH1 Travellers Accommodation, CTY1 General Policy, CT2 Dwellings in the Countryside, CT3 Social and affordable housing in the Countryside, CT4 Dispersed Rural Communities, CTY5 Temporary/residential caravans/mobile homes. The need for approximately 11,000 dwellings over the plan period is identified. The Growth Strategy and Spatial Planning Framework aim to manage housing growth to achieve sustainable patterns of residential development. In addition there are a suite of policies related to housing in settlements and housing in the countryside. Within settlements, in residential developments of 50 units or more or on sites of two hectares and over, social housing should be provided at a rate not less than 25% of the total number of units. In the countryside additional opportunities for housing have been provided such as those for a carer, holder of a commercial fishing licence and a dwelling in a farm cluster.

2.37 The Council has responded to neighbouring Council's POPs and the draft Plan Strategies for Antrim and Newtownabbey and Mid Ulster as they were published. In addition, the Council is also represented on a number of working groups to discuss cross boundary issues, for example the Metropolitan Area Spatial Working Group and Lough Neagh Forum.

- 2.38 Members of the plan team have also met with officials in the three neighbouring councils during preparation of the POP. In preparation for the draft Plan Strategy, members of the plan team met again in July 2019 with officials in the three neighbouring councils to outline the various broad approaches of the draft Plan Strategy and to discuss cross boundary issues. At these meetings the broad approach to housing, including the scale and allocation of new housing growth in Mid and East Antrim was shared and discussed. No conflicting issues emerged.
- 2.39 In consideration of neighbouring Councils development plan documents and discussions held with them, it is the opinion of this Council that there is no conflict with our draft Plan Strategy, insofar as it relates to housing.

3.0 Housing Profile

Population and Households

- 3.1 The total estimated population currently stands at 139,070 with projections of an increase of 2.2% by 2030 to a total of 142,114. Our population is ageing. In 2015 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%. The growing number of elderly is a key factor in a declining average household size. The average household size is expected to fall from 2.47 in 2011 to 2.37 by 2030. 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.
- 3.2 In 2015 17.9% of the population in the Borough were aged 0 15. By 2030 it is projected that this figure will have decreased to 17.4%. The number of households within the Borough has increased by 10.6% from 49,095 in 2001 to 54,314 in 2011. There has been a slight decrease (1.7%) in the number of households within the main towns and a slight increase in the number of households within villages (1.1%) and the countryside (0.8%).

Housing Tenure

- 3.3 Mid and East Antrim has a slightly higher level of owner occupied dwellings accounting for 72% of the Borough total compared to 67% in NI. Mid and East Antrim has a lower proportion of social housing than the Northern Ireland figure (12% compared to 15%) and the proportion of privately rented properties is also lower than the NI average (13.6% compared to 15%).
- 3.4 Comparing the tenure breakdown within Mid and East Antrim between the 2001 and the 2011 Census, the rise of the private rented sector is notable. This rise was likely caused by the rise in house prices and access to finance during the recession. Conversely, there has been a considerable decrease in the proportion of social housing. The proportion of dwellings in the owner occupied sector has decreased slightly and this is similar to the trend in general for NI in that owner occupation has reduced from 70% to 67%. The LDP will take account of the implications of these trends and variations within the Borough, in seeking to deliver an appropriate mix of tenure as part of the overall provision of new housing over the Plan period.

House Types

- 3.5 The general information on the broad housing mix considered appropriate across the Borough is provided through the up to date Housing Market Analysis (HMA), updated periodically by NIHE and published on their website. 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).
- 3.6 Table 3.1 shows projections by household type. Household growth will be driven by an increase in single person and two person adult households; the rate of growth is projected to be slightly lower than the NI total. It also highlights that there is likely to be a decline in the number of household with children, with the current proportion of 27% of households with children dropping to 20%. It should be noted that household projections are calculated in a policy neutral environment. These findings align with the NIHE Housing Market Analysis (June 2018) which also forecasts that the largest increase to 2037 will be in single person and two adult households (based on NISRA statistics).
- 3.7 The breakdown of the Borough's housing stock in 2011 in terms of type of dwellings is shown in Appendix B, Table B1. It demonstrates that a slightly larger proportion of Mid and East Antrim's housing stock consists of detached houses compared to NI. Conversely, the proportion of semi-detached houses is slightly less (Mid and East Antrim 25.3% compared to 28.5% in NI). The proportions of terraced dwellings and apartments/flats are similar to the NI levels.

- 3.8 While the number of bedroom spaces cannot readily be identified, it could be assumed that units with fewer bedrooms are made up of apartments and terraced dwellings. Using this assumption, the 2011 proportion of smaller properties is 33% of all stock (using the April 2018 LPS figures this equates to 38% of all stock, see Appendix B, Table B2).
- 3.9 We can also calculate that smaller households (single households and two adults without children), made up 57% of all households in 2016. 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.
- 3.10 However, 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.
- 3.11 The 2011 census states that 32% of people had a long-term health problem or disability, which limited their day-to-day activities. The 2011 census also indicated that of all households in Mid and East Antrim, 5.46% were adapted for wheelchair use. The household needs of those with a disability or mobility problems will need to be addressed through policies in planning, housing and social service sectors. This could lead to an increased demand for wheelchair, adapted, and Lifetime Home properties. Currently only social rented housing is required to be built to Lifetime Home standards.

	2016	2030	Change 2016-2030	
	2010	2030	Number	%
	Northern Ireland			
Single person households	201,724	225,795	24,071	12%
Two adults without children	197,748	232,289	34,541	17%
Other households with no children	109,865	117,472	7,607	7%
Lone adult with children	46,045	44,560	-1,485	-3%
Other households with children	169,745	164,464	-5,281	-3%
All households	725,127	784,580	59,453	8%
	Mid and East Antrin	ı		
Single person households	15,347	17,328	1,981	13%
Two adults without children	16,586	18,770	2,184	13%
Other households with no children	8,537	8,900	363	4%
Lone adult with children	3,145	2,951	-194	-6%
Other households with children	12,026	11,276	-750	-6%
All households	55,641	59,225	2,584	6%

 Table 3.1 Household Projections by Household Type 2016 and 2030

Source: NISRA 2016-based Household projections for NI LGDs HHP6_LDP2014

House Prices and Affordability

- 3.12 Land and Property Services (LPS) state that the standardised house price in Mid and East Antrim, at Q1 2019 was £126,004, this compared to the NI house standardised price of £135,626. The Northern Ireland Quarterly House Price Index, produced by Ulster University (<u>https://www.ulster.ac.uk/ data/assets/pdf_file/0007/425266/UU-HPI-Q1-2019-FINAL.pdf</u>) indicates that the average price of properties sold in NI during the first quarter of 2019 was £162,914. Mid and East Antrim is marginally the second lowest region within NI with an average house price of £135,680.
- 3.13 The NIHE commissioned Ulster University to carry out annual analysis of affordability in the private (owner occupied) housing market in NI (<u>https://www.nihe.gov.uk/getmedia/620d7870-3ac0-4013-9f64-</u> <u>c832a5e9b117/affordability-in-the-private-housing-market-2018.pdf.aspx?ext=.pdf</u>). The most recent

research was undertaken in 2017 and published in 2018 and used data from the Quarterly House Price Index to provide indicators of trends in repayment and deposit affordability. The study considers 11 sub-regional housing markets across NI, (which do not necessarily align with Council boundaries). Ballymena is grouped with Moyle, Ballymoney and Coleraine and therefore its affordability is estimated. This research combines the two aspects of affordability into a single relative measure. This single measure highlights that Carrickfergus and Larne remain as the most affordable areas in Northern Ireland and Ballymena is the fifth most affordable area.

Affordable Housing

- 3.14 The SPPS states that affordable housing relates to social rented housing and intermediate housing, and defines each of these (see Glossary). It is acknowledged that DfC launched a consultation paper in June 2019 in regards to the definition of affordable housing. The paper indicates that it is now appropriate to take a broader view of intermediate housing options and to provide a new definition of affordable housing which is more closely integrated with the draft Programme for Government 2016 2021.
- 3.15 The Social Housing Need Assessment carried out by NIHE determines the level of additional accommodation required to meet housing need for general needs applicants who have registered on the Common Waiting List. This is used to help assess the overall pressure for social rented housing in the Borough and the household composition of those on the list provides a broad indication of house types required.
- 3.16 Overall, social rented housing need remained at a consistently high level between 2014 and 2019, albeit that need varies considerably across the Borough (Appendix C, Figure C1). At March 2019, there were 2,528 applicants on the waiting list for Mid and East Antrim with 1,625 in housing stress. Single, older persons and small family households comprise 91% of the housing stress waiting list in the council area, this suggests that future affordable housing mix will need to be targeted to these household groups.
- 3.17 The requirement for new social rented housing in the Borough had increased gradually up to a high of 935 units in 2015, and then decreased by 31% over the three years to 2018 to 643 units as more sites became available to the social sector (Appendix C, Figures C2 and C3). The NIHE Housing Needs Assessment received in January 2019 indicates that the total new build social rented housing need remaining to 2030 within Mid and East Antrim is 1,331, see Table 3.2 overleaf.
- 3.18 NIHE will annually assess demand for intermediate housing in the council area. Currently, the NIHE Housing Investment Plan 2019 2023 indicates that 660 intermediate units are required in Mid and East Antrim for the period 2018-2028.

Settlement/Area	Total social rented housing need to 2030 baseline 2015/16	Total social rented housing need to 2030 baseline 2018/19	Number of units started since April 2015	Number of units programmed with planning approval	Remaining social rented housing need to 2030 using baseline 2018/19
Ballymena town	1,350	726	298	63	365
Carrickfergus town	810	651	103	30	518
Larne town	27	30	3	6	21
Whitehead	30	45	0	0	45
Ahoghill	105	117	2	16	99
Broughshane	159	123	8	0	115
Kells	69	18	10	7	1
Carnlough	45	39	5	0	34
Portglenone	30	30	10	0	20
Cullybackey	120	42	27	0	15
Glenravel	18	30	6	0	24
Ballycarry	6	0	2	0	0
Glynn	0	9	1	0	8
Greenisland	36	54	1	0	53
Islandmagee	0	15	0	0	15
TOTAL	2,805	1,929	476	122	1,331

 Table 3.2 Social Rented Housing Need for Mid and East Antrim Borough Council by Settlement

Source: NIHE 15 Year Social Housing Need Assessment to 2030 Mid and East Antrim (December 2018, received January 2019). Note Glenravel and Islandmagee are areas not settlements.

4.0 Survey Work and Studies Informing the Evidence Base for Housing

4.1 This section refers to studies that have been used to inform the evidence base of the LDP.

Mid and East Antrim Housing Land Availability Study (Housing Monitor)

- 4.2 The SPPS advocates a 'plan, monitor and manage' approach to housing provision to ensure that as a minimum, a five year supply of land for housing is maintained. It states that monitoring should be an ongoing process with annual reporting and review. The annual Housing Monitor is a crucial element of this process. The monitoring of housing within the Borough has been ongoing since the late 1990's and was historically carried out by the DOE. Further to Local Government Reform in 2015 the responsibility transferred to each of the 11 district councils. It is essential to record the number of dwelling completions and the level of housing land supply remaining available within the settlements on a yearly basis in order to ensure that there is an adequate and continuous supply of available housing land within the Borough.
- 4.3 We have carried out three Housing Monitors to date and will continue to do so on a yearly basis. The purpose of the annual Housing Monitor is:
 - 1. To monitor the course of housing development in settlements with regard to the RDS;
 - 2. To monitor progress of housing development in settlements in accordance with the provisions of prevailing Development Plans;
 - 3. To inform the preparation of the LDP with regard to the allocation of land for housing; and
 - 4. To provide information on the available potential for further housing development in settlements.

Area Developed (Ha)		Units Co	Units Complete		Available	
	1 April 2012 - 31 March 2018	1 April 2017 - 31 March 2018	1 April 2012 - 31 March 2018	1 April 2017 - 31 March 2018	Potential (Ha)	potential (Units)
Within the urban fabric*	47.4	17.57	1,402	534	159.44	4,335
Greenfield	41.24	15.31	925	308	161.54	3,517
Settlements Total	88.64	32.88	2,327	842	320.98	7,852
% of all completed units within the urban fabric*	-	-	60.2%	63.4%	-	55.2%

Table 4.1 Housing Monitor Summary

*Refers to the urban fabric of settlements over 5,000 population

Housing in the Open Countryside

4.4 The annual Housing Monitor is limited to settlements within the Borough and there is no similar rural housing monitor currently undertaken to assess the quantum of houses being built in the open countryside. Therefore to help understand build rates in the open countryside, building control completion certificates for dwellings outside settlement limits have been analysed (Table 4.2). It should be noted that the criteria for defining a completed dwelling varies between the Housing Monitor and that deemed necessary to issue a building control certificate, the latter being more stringent.

Year	New dwellings completed (excluding replacements)	Replacements completed	Total
1 April 2012 - 31 March 2013	108	20	128
1 April 2013 - 31 March 2014	87	8	95
1 April 2014 - 31 March 2015	90	12	102
1 April 2015 - 31 March 2016	95*	10	105
1 April 2016 - 31 March 2017	76	5	81
1 April 2017 - 31 March 2018	83	5	88
Total	539	60	599

 Table 4.2 New and replacement dwelling completions in open countryside 1 April 2012 – 31 March 2018

Source: Building Control completion records

*3 dwellings completed in Mill Bay added into the countryside completion count as it is a settlement proposed to be de-designated. Note: The completions for the rural and urban years have been taken as per HM year so each year is 1 April to 31 March. The urban figures for earlier HM years which do not follow this pattern have been pro-rated.

Urban Capacity Study (2018)

4.5 The urban capacity study (Appendix I) involved an initial audit of the potential for future housing capacity within the urban footprint of our towns. Urban capacity sites were identified, assessed and an unconstrained yield per hectare applied. Future potential windfall was also analysed. This study will help to ensure that priority is given to building new dwellings within exiting urban footprints, including the reuse of previously developed or 'brownfield' land, before considering the need to use urban fringe sites or extend the development limits of settlements.

Urban Fringe Study (2019)

4.6 The urban fringe study involved an initial audit of the amount of suitable, undeveloped, unzoned land within the urban fringe of our towns which could potentially be developed for housing. The total yield for undeveloped, unzoned land within the urban fringe which could be developed for housing within the top two settlement tiers is 3,190 units.

Undeveloped Zoned Housing Land Audit (2018)

4.7 To date two audits of land currently zoned for housing under the extant Area Plans¹, but not yet developed have been carried out. The audits were carried out in 2017 and 2018 and whilst they were informed by the Housing Land Availability Reports (Housing Monitor) for those years, the findings provide a more comprehensive review of the lands. The audit provides a consolidated assessment of the amount of housing land that has been developed and sets out the quantum of undeveloped zoned housing land, both committed and uncommitted, which remains available for housing development. A database of the assets and constraints of undeveloped zoned land was also complied as part of the review. It is intended that these lands will continue to be monitored and reviewed on a yearly basis.

Zoned Housing Land Ownership Survey (2017)

4.8 The SPPS states that LDPs should ensure that there is an adequate and available supply of land to meet the identified housing need. In 2017 known landowners of undeveloped zoned housing land within the Borough where contacted via a written questionnaire. The purpose of this was to confirm ownership and to ascertain their intentions with regards to the future development of the land along with a likely timescale for development. Landowners were also asked to advise if there were any known constraints, including legal

¹ This study used the BMAP 2015 zonings rather than the Carrickfergus Area Plan zonings as the former are more comprehensive and have been utilised for housing development. Whilst there were some slight differences in relation to land zoned for housing under draft BMAP and BMAP, these differences relate to lands that are now complete and therefore have no bearing on the identification of undeveloped land.

issues, associated with the land which would impede its development. It should be noted that it was not possible to identify all landowners and overall the response rate to the undeveloped zoned housing land questionnaire was just over 80%. Table 4.3 indicates the likelihood of uncommitted/undeveloped zoned housing land and land identified as suitable for housing as per the undeveloped zoned housing land audit (2018) coming forward for housing in the lifetime of the plan.

 Table 4.3 Summary of intention to develop uncommitted/undeveloped zoned housing and land identified as suitable for housing

			Summary of Response		
	Uncommitted Zoned Housing Land/Land Identified as Suitable for Housing (2018) (Ha)	No Intention to Develop (Ha)	Likely to Develop (Ha)	Intention Unknown (Ha)*	
Main Towns	132.32	3.15	100.06	29.11	
Small Towns and Villages	21.79	1.33	14.72	5.74	
Total	154.11	4.48	114.78	34.85	
	100%	2.9%	74.5%	22.6%	

*Intention Unknown includes land where landowner is unknown, no response has been received or were response is unclear.

Houses in Multiple Occupation Study (HMO) (2018)

- 4.9 In May 2004 the Northern Ireland Housing Executive (NIHE) introduced a statutory registration scheme for HMO's and since 1 April 2013 this scheme was extended to cover all areas in NI and all HMO properties. A new licensing scheme was subsequently introduced in April 2019 which replaces this registration scheme, and in addition local councils across NI took over responsibility for HMO's from the NIHE.
- 4.10 The NIHE HMO register was used as the basis of our HMO study carried out in October 2018. The purpose of the study was to identify the quantum and location of existing HMO's across the Borough and ascertain if there are any potential issues with clustering of HMOs. The study concluded that at present the scale of HMO development with Mid and East Antrim is not a significant issue. This however will remain under review.

NIHE Housing Investment Plan (HIP) Mid and East Antrim (2019-2023)

4.11 NIHE published their second HIP in 2019 which set out the vision for the strategic development for housing across all tenures. The HIP outcomes have been aligned to our Community Plan to show how work by the NIHE supports the work of our Council. This report indicates that within Mid and East Antrim the social rented housing need for 2018 – 2023 is 643 and the intermediate housing need is 660 for 2018 – 2028. It also refers to a residual need (over five years) for 37 wheelchair units, however this figure can fluctuate annually.

NIHE Housing Needs Assessment (HNA) Mid and East Antrim

4.12 The NIHE present a Housing Needs Assessment each year to Council detailing the need for general needs social rented housing, supported housing and traveller's accommodation with the Borough. The social rented housing need is normally projected for a 5 year period and in the latest annual report the total general needs social rented housing need for Mid and East Antrim Council for 2018 - 2023 has been assessed at 643 units. NIHE also carried out a further HNA to project the social rented need until the end of the plan period. This study used the 2015/16 social rented housing need for the Borough as a baseline and took

account of units started since April 2015 and units programmed with planning approval. It estimated a social rented housing need of 1,331 units for the period 2018-2030.

4.13 The SPPS states that the Housing Needs Assessment must be taken into consideration in the allocation 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 Housing Needs assessment will influence how the LDP facilitates a reasonable mix and balance of housing tenures and types.

NIHE Housing Market Analysis Update (HMA) Mid and East Antrim (June 2018)

- 4.14 The purpose of a Housing Market Analysis is to provide evidence to develop integrated housing policies and approaches to ensure household access to appropriate housing. The HMA Update provides a regional and local housing market context, identifying key housing market drivers, and provides an overview of the three main tenures, social housing (including general needs, supported and traveller accommodation), the private rented sector and owner occupied sector. It demonstrates an understanding of current housing market trends and identifies potential future imbalances in the NI housing market.
- 4.15 The level of homelessness in Mid and East Antrim has been fairly consistent over the past five years, with an increasing trend, while the numbers of those accepted as homeless also increased. No traveller need was identified within the Borough.
- 4.16 The report also highlighted a continued trend in decreasing household size along with an aging population. This therefore will increase the demand for smaller units, wheelchair standard housing and houses that can be adapted. In Mid and East Antrim it is anticipated that there will be no reduction the Private Rental Sector (PRS) market and demand is likely to remain high as it will continue to be an important source of housing for those who find it difficult to access both social housing and owner occupation. Regionally, welfare reform, the lack of a NI assembly and the effect of the UK leaving the EU are stated as some of the main influencing factors on housing. Welfare Reform in particular is likely to resort in increased housing stress in the social housing sector and demand for smaller unit accommodation.

DfC - Developer Contributions for Affordable Housing in Northern Ireland (2015)

- 4.17 This report was carried out by the Department for Communities (DfC) in response to the fact that Northern Ireland is the only region in the UK that does not have a contribution scheme to provide affordable housing in mix tenure developments delivered through the planning system. The report builds on two earlier pieces of work initiated in 2014 and which never progressed beyond the consultation stage; draft PPS 22 'Affordable Housing' and a draft consultation on Developer contributions for Affordable Housing as carried out by the Department for Social Development. The aim of the report was to assess if a developer contribution scheme could be introduced in Northern Ireland without impacting on the recovery of the local housing market.
- 4.18 The study confirmed that there is a sufficient aggregate social housing need across NI to justify a developer contribution scheme to some extent. This however is set against a backdrop of the differing views about such scheme from the development industry and those currently providing social housing. It is acknowledged that such a scheme has to be balanced against viability and other practical concerns. The report concluded that introducing a scheme with a single percentage of affordable housing across the region is not realistic or workable for most of NI. The viability analysis concluded that outside of Belfast the housing market is not as strong in terms of values and activity, therefore a developer contribution scheme without public subsidy would not be viable. The main recommendation to come out of the study is that ultimately targets, thresholds and delivery mechanisms for a developer contribution scheme should be set out as part of the Local Development Plan process and that further consideration to these issues is required.

5.0 Preferred Options Paper

- 5.1 Council published its Preferred Options Paper (POP) in June 2017. The main purpose of the POP is to inform the next stage in the LDP process, i.e. the Plan Strategy.
- 5.2 Building on the emerging evidence base², the POP identified some 36 key strategic planning issues relevant to Mid and East Antrim, set out alternative options for addressing most of these key issues, and highlighted Council's preferred option. The POP also included an initial policy review of the operational policies contained in the suite of Planning Policy Statements (PPSs) published by the former Department of Environment (now Dfl), also taking account of the Strategic Planning Policy Statement (SPPS).
- 5.3 The POP was subject to 12 weeks public consultation which resulted in 132 responses from members of the public and statutory consultees. A public consultation report on the POP was published by Council in November 2017.
- 5.4 The POP identified three key issues (4, 14 and 15) and associated preferred and alternative options relating to housing. In addition, Key Issue 10 dealt with protecting and promoting other town centre uses including housing (see Appendix H).

Key Issue 4 – Housing Allocation Strategy

- 5.5 Our preferred option was to maintain the status quo of housing allocation based on the proportion of households living in main and small towns at the time of the 2011 Census and increase the percentage of housing growth to villages and small settlements at the expense of the open countryside (see Table 5.1 below for allocation figures).
- 5.6 The POP also provided two alternative options as follows:
 - Alternative option b) proposed to maintain the status quo in terms of housing allocation based on the proportion of households living in main towns, small towns, villages, small settlements and the countryside at the time of the 2011 Census (see Table 5.1 below for allocation figures); and
 - Alternative option c) proposed to increase the ability to meet the RDS 60% brownfield target in settlements over 5,000 population (see Table 5.1 below for allocation figures).

Settlement Tier	POP Preferred Option a)	POP Alternative Option b)	POP Alternative Option c)
Main towns	58.5%	58.5%	70%
Small towns	14.9%	14.9%	14.9%
Villages	9.6%	6.6%	6.6%
Small settlements	5%	1.8%	2.5%
Countryside	12%	18.2%	6%

Table 5.1 POP housing allocation figures

5.7 Just over half of the public respondents were supportive of the preferred option. In terms of statutory consultees, DfI highlighted that the evidence showed a fall between 2001 – 2011 in the proportion of population in Ballymena and Larne relative to their Boroughs, coupled with slight percentage increase of households in villages. DfI raised concerns that the preferred option would reinforce this trend of disproportionate growth in lower tier settlements and will fail to strengthen the population in the hubs.

² A series of 14 topic based position papers informing the POP, plus our annual housing monitor and bi-annual industrial monitor are available on the Council website.

Key Issue 14 – Facilitating social and affordable housing

- 5.8 Our preferred option proposed a three pronged approach:
 - Zone sites solely for social/affordable housing in the Local Policies Plan;
 - Include Key Site Requirements where a proportion of a general housing zoning should be provided as social housing, where a need has been identified; and
 - 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.
- 5.9 Our alternative options were to set out strategic policy that either b) allowed the spatial zoning of social/affordable housing sites, where a need has been identified, through the LPP or c) enabled the LPP to indicate through key site requirements the proportion of social/affordable housing units to be provided in specific housing zonings, to meet local needs or d) required all housing sites, over certain thresholds, to provide a proportion of social/affordable housing.
- 5.10 Just over half of the public respondents supported the POP preferred option. A key theme coming from the responses was that any affordable housing policy should be applicable where a need is identified. Whilst the NIHE supported the preferred option, they suggested that the option should be amended to ensure key site requirements and developments over a certain unit threshold deliver more affordable housing.

Key Issue 15 – Delivery of housing to meet the needs of people with mobility difficulties

5.11 Our preferred option was to set out strategic policy that all ground floor apartment in block of two storey or above should be wheelchair accessible units. Our alternative option b) was to have no intervention by the LDP for delivery of wheelchair accessible dwelling units. Both the public and NIHE were supportive of the preferred option.

Key Issue 10 – Protecting and promoting other town centre uses

- 5.12 Our preferred option was to facilitate residential use through the protection of existing housing areas and/or including housing as part of the development mix in opportunity sites. In addition Class B1 Business Uses would be facilitating on upper floors in town centres.
- 5.13 Four alternative options were set out. Option b) was to only facilitate the housing element of the preferred option, option c) was only to facilitate the Class B1 Business Use element of the preferred option, option d) was to restrict housing/and Class B1 Uses in town centres to reduce competition for land for retailing and finally option e) suggested having minimal plan intervention, allowing flexibility by assessing applications on their merits, taking account of the SPPS.
- 5.14 Both the public and consultees were in favour of the preferred option. Whilst initially seeking more baseline information to assist appraisal of the option following further discussions with DfI, they recognised that it is widely accepted that town centre living enhances vitality, stimulates evening economy and can reduce vandalism.
- 5.15 In addition to these key issues, the POP included a review of the existing housing policies and made recommendations as to whether to bring these policies forward with or without amendments (see Appendix H). The public were also asked a number of questions about existing policy to assist with formulation of policy wording for the Plan Strategy.
- 5.16 For full details of the main issues raised by respondents to the POP consultation and Councils consideration refer to the POP Public Consultation Report November 2017, available at: https://www.midandeastantrim.gov.uk/downloads/POP_Public Consultation Report.pdf

6.0 Consultee and Councillor Engagement

- 6.1 In order to meet the requirements set out in the Planning Act relating to the need for the Plan Strategy to take account of the RDS, other policy and guidance issued by the Dfl and other relevant government strategies and plans; Council has engaged key consultees representing relevant central government departments and agencies. Representatives from relevant Council departments have also been engaged to ensure that due account has been taken of Council's Community Plan, as well as other Council strategies and initiatives. This engagement was undertaken by way of a series of eight 'Project Management Team' meetings held between April 2018 and April 2019 and has had a significant influence on the development of the strategic policies and proposals.
- 6.2 The Planning Act requires the Plan Strategy to be adopted by resolution of the Council, following approval by the Dfl. Accordingly, elected members have also been engaged in the development of the draft Plan Strategy, to ensure that the document is generally aligned with Council's strategic priorities. This engagement was facilitated through a series of six councillor workshops held between November 2018 and March 2019.
- 6.3 The draft Plan Strategy Housing Allocation Strategy and housing policies were presented at the Project Management Team meetings held on 12 April 2018 and 27 March 2019 and the Councillor workshops held on 31 January 2019 and 14 March 2019. Minor amendments were made to the strategic subject policies following comments made at or following these meetings.

7.0 Draft Plan Strategy Policy Approach

- 7.1 Planning for housing is a core function of the LDP. It is also a multi-faceted function. As is apparent from the policy context set within Section 2.0 of this document, a wide range of considerations need to be factored in and interwoven in bringing forward a package of strategic proposals and policies that will deliver on regional priorities, whilst also meeting local housing needs in Mid and East Antrim.
- 7.2 The draft Plan Strategy policy approach to housing therefore needs to be diverse in order to cover all basis. However, in summary, it is possible to distinguish three main strands in regard to the policy approach to housing in settlements. In line with paragraph 6.136 of the SPPS these are:
 - a) To facilitate an adequate and available supply of quality housing to meet the needs of everyone;
 - b) To promote more sustainable housing development within existing urban areas; and
 - c) To provide an appropriate mix of housing development with houses in a range of size and tenure, and also with due account taken of affordability and the meeting of special housing needs.
- 7.3 The draft Plan Strategy approach in regard to housing development in the countryside reflects and complements the overall approach to housing growth across the Borough. In addition, it aligns with the overarching aim of the SPPS in regard to development in the countryside:
 - To manage development in a manner which strikes a balance between protection of the environment from inappropriate development, while supporting and sustaining rural communities, consistent with the RDS.
- 7.4 The draft Plan Strategy strategic proposals and policies relating to housing are the outworking of the approach outlined above. The remainder of this section demonstrates the supporting evidence base for these proposals and policies. Much of this evidence is derived from the survey work and studies listed under Section 4.0 of this Technical Supplement. In addition evidence is drawn from the POP and responses to it in regard to the selected key issues and the policy review as it relates to housing.

Strategic Housing Allocation

- 7.5 The draft Plan Strategy Strategic Housing Allocation is set out in Strategic Proposal SGS3 of the document. It represents the outworking of that element of the approach referred to above which seeks 'to facilitate an adequate and available supply of quality housing to meet the needs of everyone'.
- 7.6 Paragraphs 7.7 to 7.20 below detail the methodology and information used to arrive at the Strategic Housing Allocation under Strategic Proposal SGS3 in the draft Plan Strategy. This elaborates on the broad methodology described in Appendix A of the draft Plan Strategy and is considered to fully support the proposed Strategic Housing Allocation.

Housing Growth Indicators (HGIs)

- 7.7 The RDS expresses regional housing needs as Housing Growth Indicators (HGIs), which are produced as a guide for the preparation of Local Development Plans. The HGI is an estimate of the new dwelling requirement for the Council area over most of the Plan period. The figures are based on current population/household formation trends making the assumption that these trends will continue in the future. They are therefore guidance, rather than a cap on housing development in the area or a target to be achieved. In addition to the household projections, the HGIs also use data on vacant housing stock, second homes and net conversions/closures/demolitions (net stock loss) to produce the final figure.
- 7.8 In April 2016, the Department for Infrastructure published a revised HGI figure of 5,400 dwellings for Mid and East Antrim Borough for the period 2012-2025, using 2012-based household projections. Projecting the figure of 5,400 on a pro rata basis to 2030 for the period 2012-2030 gives a figure of 7,477. 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.

Allocation of housing to settlement tiers and the countryside

7.9 Taking account of the comments to Key Issue 4 of the POP and in line with our proposed Spatial Growth Strategy, the strategic housing allocation in the draft Plan Strategy sets out to significantly increase the 2011 Census status quo in terms of the proportion of households in main towns, and to marginally increase the percentage in small towns, villages and small settlements. This is in line with the RDS in that most housing growth is directed to the main towns of Ballymena, Larne and Carrickfergus whilst ensuring that the needs of the rural community are met in a sustainable manner. Column two of Table 7.1 sets out the percentage of the HGI to be allocated to the various tiers of the settlement hierarchy and the countryside. Column three of Table 7.1 highlights the difference between the proportion of households in a tier at the time of the 2011 Census and that now aimed for through the allocation.

Tier	Allocation to Tier (% of HGI)	Difference to 2011 Census status quo	Allocation to Tier (2012-2030 Figure)
Main Towns	62%	3.5 percentage point increase	4,636
Small Towns	15%	1 percentage point increase	1,122
Villages	8.5%	1 percentage point increase	636
Small Settlements	2.5%	0.7 percentage point increase	187
Countryside	12%	6.2 percentage point decrease	897
Total	100%		7,477

Table 7.1 Housing Allocation to Settlement tiers and the Countryside

Note: Figures in column four are rounded therefore may not add exactly

Allocation of housing between settlements in each tier

7.10 The starting point for allocating housing between the settlements in each tier was to calculate their share of the allocation to the tier (as set out in Table 7.1 column 2 and 4) based on their share of households in 2011, which gave a preliminary housing allocation to each settlement. Column four of Table 7.2 Housing Allocation between Settlements in each Tier shows the initial allocation to each settlement after working through this exercise.

Table 7.2 Housing Allocation between Settlements in each Tier

		Main towns - small towns -	sehold % in 2011 -3.5% on status quo, +1%, villages +1%, ents +0.7%, countryside -6.2%	Adjusted HGI allocation figure to individual settlements following application
Settlement	Households 2011Census	%	HGI allocation (HGI 2012-2030: 7,477)	of Housing Evaluation Framework
Main Towns				
Ballymena	12,105	23.6%	1,765	1,791
Carrickfergus	11,536	22.5%	1,682	1,667
Larne	8,152	15.9%	1,189	1,178
Main Town total	31,793	62%	4,636	4,636
Small Towns		-		
Greenisland	2,324	4.59%	343	357
Whitehead	1,633	3.22%	241	222
Ahoghill	1,320	2.6%	194	192
Broughshane	1,235	2.44%	182	176
Cullybackey	1,088	2.15%	161	175
Small Towns total	7,600	15%	1,122	1,122
Villages				
Kells/Connor	808	1.7%	127	135
Carnlough	563	1.18%	88	93
Ballycarry	536	1.12%	84	85
Portglenone	498	1.04%	78	81
Ballystrudder	389	0.82%	61	62
Ballygalley	333	0.7%	52	45
Glynn	267	0.56%	42	40
Glenarm	242	0.51%	38	35
Cargan	223	0.47%	35	32
Martinstown	108	0.23%	17	16
Clough	90	0.19%	14	12
Villages total	4,057	8.5%	636	636
Small Settlements				
Small settlements total	1.001	2.5%	187	187
Settlement total	44,451	88%	6,580	6,580
Countryside total	9,863	12%	897	897
Mid and East Antrim Total	54,314		7,477	7,477

Note: Figures are rounded therefore may not add exactly. In column 3 the figures +3.5, +1, +0.7, -6.2 refer to percentage point increases or decrease to the percentage allocated to settlement tiers from the status quo at the time of the 2011 Census.

Applying the RDS Housing Evaluation Framework

- 7.11 The next stage in the housing allocation process involved applying the RDS Housing Evaluation Framework (HEF). The RDS states that, "the broad evaluation framework (set out in Table 3.2 RDS) is to be used to assist judgements on the allocation of housing growth".
- 7.12 The six tests within the HEF (see Table 7.3) are based on the capacity of a settlement to accommodate additional housing growth, with the overall aim of ensuring that the concept of sustainable development is built into the housing allocation process.

Resource Test	Studies should be carried out to assess and detail the existence of community assets and physical infrastructure such as water, waste and sewage, including spare capacity.		
Environmental Capacity Test	An assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made.		
Transport Test	Studies should be carried out to assess the potential for integrating land use and public transport and walking and cycling routes to help reduce reliance on the car.		
Economic Development Test	The potential to facilitate an appropriate housing and jobs balance and to unlock any major strategic development opportunities should be assessed and detailed.		
Urban and Rural Character Test	Assessment should be made of the potential to maintain a sense of place, and to integrate new development in a way that does not detract from the character and identity of the settlement.		
Community Services Test	The potential to underpin and, where necessary, reinforce the community service role and function of the settlement should be assessed and detailed.		

Table 7.3 RDS Housing Evaluation Framework

Source: RDS 2035 p42

- 7.13 The six HEF tests have been applied to the top three tiers of the settlement hierarchy using a broad scoring system and a series of indicators tailored for the different tiers. Whilst the RDS only refers to the use of the framework for main towns and small towns it is considered appropriate to extend the evaluation to the villages. However, the evaluation has not been applied to the small settlements tier and this remains based on the share of households in 2011. The RDS does not require weighting of the tests and therefore equal weight has been given to each individual test.
- 7.14 Each settlement has been judged and given a plus, nil or minus percentage score for each of the six HEF tests. Comparisons of settlements have only been made with others within the same tier. The percentage scores for each of the tests have then been totalled to provide an overall percentage score for each settlement. The overall percentage score for each settlement has then been applied to the preliminary allocation figure which had been given to each settlement based on their share of households in 2011, and this equates to the revised housing allocation for each settlement set out in Figure 7.1 Housing Allocation figures following application of HEF and column five of Table 7.2. Further detail on the methodology used is set out in Appendix E.

Figure 7.1 Housing Allocation figures following application of HEF



Housing unit completions

7.15 The above notional allocation to various settlements was then refined to take account of the number of housing units that have been completed/already constructed in each settlement between April 2012 and March 2018 (Figure 7.2 Housing unit completions in Settlements and the Countryside 2012-2018).

Ballymena	6			800
Carrickfergus			428	
Larne		299		
Greenisland		261		
Broughshane	109			
Ahoghill	98			
Cullybackey	65			
Whitehead				
Kells/Connor	63			
Portglenone	36			
Martinstown	32			
Ballycarry	= 27			
Ballystrudder	22			
Cargan	= 16			
Carnlough	1 0			
Ballygalley	17			
Glenarm	1			
Glynn	1			
Clough	0			
Glenoe	= 20			
Grange Corner	11			
Mullaghboy	5			
Carncastle	1 3			
Crosshill	1 3			
Magheramorne	1 2			
Carnalbanagh	1			
Mounthill	0			
Raloo	0			
Newtowncrommelin	0			
Moorfields	0			
Buckna	0			
Glarryford	0			
Woodgreen	0			
Milltown	0			
Slaght	0			
Craigywarren	0			
Countryside	-		_	539

Figure 7.2 Housing unit completions in Settlements and the Countryside 2012-2018

Note: New small settlements have all be given a figure of 0 as their boundaries are yet to be determined and they are not included in the current settlement housing monitor. Their completions are accounted for in the countryside figure.

Table 7.4 Urban and Rural housing completions 2012-2018 in comparison to yearly average 2012-2030 HGI

	2012/13	2013/14	2014/15	2015/16*	2016/17	2017/18	Total completed units
Settlement completions (Housing Monitor)	163	113	319	431	456	842	2,324
Rural completions (Building Control records)	108	87	90	95	76	83	539
Total Completions	271	200	409	526	532	925	2,863
Difference to HGI	-144	-215	-6	+111	+117	+510	+373

*3 dwellings completed in Mill Bay added into the countryside completion count as it is a settlement proposed to be de-designated. Note: The rural completions exclude replacement dwellings. The completions for the rural and urban years have been taken as per HM year so each year is 1 April to 31 March. The urban figures for earlier HM years which do not follow this pattern have been pro-rated.



Figure 7.3 Urban and Rural housing completions 2012-2018 in comparison to yearly average 2012-2030 HGI

7.16 Since April 2012, 2,324 housing units have been completed within settlements and 539 in the open countryside (excluding replacement dwellings). This is a total of 2,863 housing unit completions within the Borough and equates to an average of 477 per year. Taking away the number of housing units completed from the HGI figure, adjusted by the HEF, for the period 2012-2030 leaves a figure of 4,614 for the Borough (see column two of Table 7.5 Housing Allocation 2018-2030 and Live Residential Planning Permission in Settlements April 2018 for breakdown of individual settlements). The table also shows the residual allocation to each settlement after deducting the number of units built (2012-2018) from the notional allocation to each settlement as shown in Figure 7.1. It is this residual figure (as shown in SGS3) which remains to be allocated to each settlement over the remainder of the Plan period.

7.17 The methodology above has been used as the basis for the Strategic Housing Allocation figures, for the period 2018-2030, set out in the draft Plan Strategy proposal SGS3.

Existing housing commitments

- 7.18 The SPPS process for allocating housing land requires an allowance for existing housing commitments (para 6.139 third bullet refers). Consideration of dwellings already constructed or completed has been discussed above and along with consideration of HGIs and the RDS housing evaluation framework help support SGS3 Strategic Housing Allocation. The remaining types of commitments are listed as approvals not yet commenced and residential development proposals likely to be approved. This list would appear to exclude sites that have commenced but have not been completed. Therefore, for the purposes of commitments these are considered to be dwelling units with live planning permission, some of which may be under construction or approved but where construction has not yet commenced.
- 7.19 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.
- 7.20 The latest Housing Monitor indicates that, in some settlements the existing live planning permission commitments are already greater than their remaining allocation figure for 2018-2030. This situation applies in the main town of Ballymena, in the small towns of Greenisland, Broughshane and Cullybackey and in the villages of Ballycarry, Kells/Connor, Clough and Martinstown. Elsewhere, Carrickfergus, Larne, Ahoghill, Portglenone, Ballystrudder, Cargan are quite close to meeting their allocation figure through existing live permissions. The villages of Ballygalley, Carnlough, Glenarm and Glynn would require around 30-40 more units to meet their allocation. In the small town of Whitehead existing live approvals fall well short of the notional housing allocation figure (see Table 7.5 Housing Allocation 2018-2030 and Live Residential Planning Permission in Settlements April 2018).

Settlement	Housing Allocation 2018- 2030 after HEF adjustment (2012-2030 HGI minus Completions 2012-2018)	Live residential planning permissions (units)	Difference in notional allocation figure and live planning permissions (units)
Main Towns			
Ballymena	991	996	Exceeds allocation by 5
Carrickfergus	1,239	1,222	17 short of allocation
Larne	879	845	34 short of allocation
Main Town total	3,109	3,063	46 short of allocation
Small Towns			
Greenisland	96	167	Exceeds allocation by 71
Whitehead	218	11	207 short of allocation
Ahoghill	94	73	21 short of allocation
Broughshane	67	69	Exceeds allocation by 2
Cullybackey	110	113	Exceeds allocation by 3
Small Towns total	584	433	151 short of allocation
Villages			
Kells/Connor	72	89	Exceeds allocation by 17
Carnlough	83	56	27 short of allocation
Ballycarry	58	173	Exceeds allocation by 115
Portglenone	45	42	3 short of allocation
Ballystrudder	40	34	6 short of allocation
Ballygalley	38	1	37 short of allocation
Glynn	39	0	39 short of allocation
Glenarm	34	3	31 short of allocation
Cargan	16	6	10 short of allocation
Martinstown	-16	9	Exceeds allocation by 25
Clough	12	16	Exceeds allocation by 4
Villages total	421	429	
Small Settlements			
Grange Corner		0	
Carnalbanagh		0	
Carncastle		24	
Crosshill		6	
Glence		0	
Magheramorne		2	
Mounthill		0	
Mullaghboy		11	
Raloo	Combined figure below	0	
Newtowncrommelin			
Moorfields			
Buckna			
Glarryford		Settlement limits	
Woodgreen		not yet defined	
Milltown			
Slaght			
Craigywarren			
Small settlements total	142	72	
Settlement total	4,256	3,997	
Countryside total	358	Unknown	
Mid and East Antrim Total	4,614		
the serve was strendly invest	1,041		

Note: The figure of 72 live approvals in small settlements total includes 29 dwellings within the settlements to be de-designated (they are not listed in this table).

Management of Housing Supply

- 7.21 The draft Plan Strategy seeks to manage housing supply as set out in Strategic Proposal SGS5 of the document. This represents the outworking of that element of the overall approach to housing, which seeks, 'to promote more sustainable housing development within existing urban areas'.
- 7.22 Paragraphs 7.23 to 7.39 below detail the methodology and information used to arrive at Strategic Proposal SGS5 for the Management of Housing Supply. Again, this elaborates on the broad methodology described in Appendix A of the draft Plan Strategy and is considered to fully support the Strategic Proposal (SGS5) for the Management of Housing Supply.

Selection of Settlements

- 7.23 The starting point for considering the management of housing supply was to identify those settlements where such a policy approach is considered appropriate. The SPPS advocates that a sequential approach to housing development is appropriate for settlements with a population exceeding 5,000, in order to maximise the use of 'brownfield' and other sites in the built up footprint and to promote compact urban forms. Accordingly, Ballymena, Carrickfergus, Larne and Greenisland were automatically selected as all exceed the stipulated threshold.
- 7.24 The SPPS also states that it may be appropriate to apply the sequential approach below this threshold in certain (unspecified) circumstances. In Mid and East Antrim it was determined that it would be appropriate to seek to manage housing development in the remaining four small towns given that these are relatively sustainable locations for future housing growth and recognised as such in the LDP Spatial Growth Strategy. It was also recognised that a different policy approach may be appropriate vis-à-vis the larger settlements.

Housing Commitments

- 7.25 The significant level of housing commitment due to live planning permissions has already been referred to and is shown on Table 7.5. This is particularly marked in the four settlements exceeding 5,000 population, where there was permission for 3,230 housing units in total in April 2018, representing 81% of total commitments in all settlements. Whilst it is possible that some of these units may never be built, the level of housing commitment in these larger settlements is one of the main reasons why it is necessary to adopt a managed approach to housing supply. Failure to take account of such commitments and to zone additional land to meet identified housing need (2018 2030) would inevitably result in gross over provision of housing land.
- 7.26 Accordingly, Strategic Proposal SGS5 includes sites with planning permission above the threshold of 0.2 hectares/10 units, as first phase housing land in all of the four largest settlements. In the remaining small towns, the policy also commits to zoning such sites, recognising that in most of these settlements the level of commitments is significant in terms of meeting identified housing need (2018 2030).

Urban Capacity Study

7.27 The draft Plan Strategy policy approach is to promote more sustainable development within existing urban areas, in line with the RDS and the SPPS. To facilitate this, the SPPS suggests that Council should undertake an urban capacity study to assess the potential for future housing growth within the urban footprint and the capacity for different types and densities of housing. At this stage an interim urban capacity study has been undertaken within the main and small towns to inform the housing growth strategy primarily through the identification of sites within the urban footprint that are suitable for new residential development and their potential yield along with an estimate of the likely yield from unidentified sites within the urban footprint; windfall housing. The study also identifies existing commitments within the urban footprints along with the estimated percentage of brownfield land within the urban footprints of settlements over 5,000 population.

For full details on the methodology used see Appendix I Urban Capacity Study which is available as a separate appendix to this technical supplement.

- 7.28 This initial urban capacity study, based on the 2016-2017 housing monitor, and carried out within the main and small towns within the Borough, estimates that urban capacity sites over 0.2 hectares, could provide approximately 4,087 additional housing units. 2,150 of these units are on sites outside existing zoned housing land, with the majority of this capacity in Ballymena and Larne (see Appendix 1 Urban Capacity Study for full details). Most recent figures from the 2017-2018 housing monitor reveal that approximately 571 of the 4,087 unit potential from urban capacity sites have now become live residential planning permissions. This is reflected in Figures 7.4 and 7.5.
- 7.29 The SPPS highlights that windfall potential arising from previously developed land within the urban footprint is central to the assessment of future housing land requirement and is a key element of the urban capacity study. In line with the objectives of the RDS it is necessary to make full allowance for this when deciding the number of sites to identify for development in the plan to prevent excessive allocation of housing land. A current initial estimate of the potential housing returns from previously developed land and smaller vacant pieces of land within the urban footprint which might become available for housing during the lifespan of the LDP indicates approximately 580 additional housing units (see Appendix I Urban Capacity Study).
- 7.30 Whilst acknowledging the scale of housing commitment previously referred to, Figure 7.4 demonstrates that for the three main towns, the level of commitment just about meets anticipated housing need over the remainder of the Plan period. However, the SPPS requires, as a minimum, that a five year supply of land is maintained. Given this requirement, while also recognising that not all approvals may be acted upon, it is apparent that additional land needs to be zoned for housing.
- 7.31 Sites within the urban footprint are the most sustainable option for reasons previously explained. Further, the urban capacity study confirms that there should be an ample supply to meet housing need in all three main towns, even should it transpire that some sites are either not suitable for housing or not available. Figure 7.4 (right hand bar chart for each settlement) demonstrates the additional potential (relative to housing need) that is made possible through full utilisation of the identified urban capacity sites.
- 7.32 Accordingly, it is considered that the circumstances outlined above provide justification for Strategic Proposal SGS5 in including urban capacity sites as Phase 1 housing land in the three main towns. The policy also extends this provision to Greenisland, albeit that there is a greater potential there for housing need to be met through existing permissions.
- 7.33 Figure 7.5 shows that in the remaining small towns, existing permissions are unlikely to meet identified housing needs, therefore the utilisation of urban capacity sites through zoning (as proposed by SGS5) appears to be justified. Whilst this may result in some degree of over provision in Cullybackey, this is not the case in the other small towns, where urban capacity potential and windfall potential combined may be insufficient to meet identified housing need.

Undeveloped Zoned Housing sites from current extant area plans

7.34 Approximately 132 hectares of undeveloped zoned housing lands (without live planning permissions) exist within the Borough's main towns, and this can be divided into sites located within the urban footprint (included in urban capacity unit estimates) and those within the urban fringe. It is currently estimated that these lands could accommodate approximately 3,427 housing units. Within small towns, undeveloped zoned housing land or land identified as suitable for housing in extant area plans could accommodate approximately 495 housing units. An additional 58 units could be accommodated on land identified as suitable for housing be accommodated on land identified as suitable for housing within two villages.

Additional potential from Urban Fringe (excluding undeveloped zoned housing land)

- 7.35 In addition to the sources of capacity for new housing units listed above it is also estimated from a desktop study that currently the potential from the urban fringe (outside the urban footprint but within existing settlement limits) within main and small towns could yield 3,190 units. For this exercise the density was calculated at 25 dwellings per hectare. In villages and small settlements where no urban footprint has been identified, a current desktop estimate of capacity from remaining whiteland within the existing settlement limits indicates potential for 1,744 dwelling units. This estimate assumed all uncommitted whiteland would be proposed, suitable and available for housing, which potentially may not always be the case. For the purpose of this estimated figure (detailed in yellow for individual villages in Figure 7.6) various densities were applied using a judgement based on the character of the particular settlement. For most settlements this was 25 dwellings per hectare but for others it was 20 or 10 dwellings per hectare.
- 7.36 Given the situation in the larger settlements where existing zonings, urban capacity potential and windfall potential will readily meet identified housing needs, there seems to be little justification for zoning land (or retaining existing zonings) in the urban fringe in the short to medium term. Accordingly, in settlements exceeding 5,000 population, Strategic 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.
- 7.37 The situation in three out of the four remaining small towns is somewhat different. Here, there does appear to be some justification for the use of urban fringe land for housing, or where necessary and sustainable, consideration given to extending settlement limits. Accordingly this is provided for in SGS5 as it relates to the remaining small towns.

Housing Needs Assessment/Housing Market Analysis

- 7.38 The SPPS states that the Housing Needs Assessment/Housing Market Analysis provides an evidence base that must be taken into consideration in the allocation of land required to facilitate the right mix of housing tenures. It is difficult to predict affordable housing needs over the length of the plan as needs can and do fluctuate over time in response to changing economic and market trends. However, the latest HNA for the Borough, received in January 2019 highlights that total new build social rented housing need for the period 2018-2030 is currently 1,331 units (Table 3.2). The document sets out the need in individual settlements and in two wider areas, Glenravel and Islandmagee. At January 2019, 406 units were identified on the Social Housing Schemes Programme for the Borough. These units may assist in meeting the need but the programme is tentative and fluid.
- 7.39 Social rented housing need varies within settlements, with Carrickfergus having the highest need followed by Ballymena. Examining this need alongside the notional housing allocation figure for each settlement, uncovers a number of settlements (Ballymena, Greenisland, Broughshane and Cullybackey) where completions and live planning permissions would already meet the allocation figure but these will not meet the social rented housing need (Figures 7.4 and 7.5). For all these settlements, save for Broughshane, the social rented housing need could potentially be met by urban capacity and/or windfall potential. In Carrickfergus and Ahoghill, completions and live planning permissions fall just below the notional housing allocation figure, but the social rented housing need would push the figure beyond this. In Whitehead the use of all current urban capacity sites would meet the predicted social rented housing need, but fall short of meeting the notional housing allocation figure. At present it would appear that only Broughshane, Ahoghill and Whitehead may have difficulty regarding meeting current social rented housing need through urban capacity or windfall potential. However, these is some availability in the urban fringe of Ahoghill and NIHE have advised that they may accept social rented provision in nearby settlements where there is more land availability within existing settlement limits.

Figure 7.4 Notional Housing Allocation 2018-2030 in relation to Existing Approvals/Potential Urban Capacity and Windfall sites in main towns and potential in urban fringe (Whiteland and Undeveloped and Uncommitted extant Zoned housing sites) and current projected Social Rented Need until 2030



Note: The estimated numbers of urban capacity units/windfall units/urban fringe whiteland units and undeveloped zoned units 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.
Figure 7.5 Notional Housing Allocation 2018-2030 in relation to Existing Approvals/Potential Urban Capacity and Windfall sites in small towns and potential in Urban fringe (Whiteland and Undeveloped and Uncommitted extant Zoned housing sites) and current projected Social Rented Need until 2030



Note: The estimated numbers of urban capacity units/windfall units/urban fringe whiteland units and undeveloped zoned units 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.

Technical Supplement 3

Figure 7.6 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



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.

The HNA also highlights a social rented need of 24 in Glenravel, (this area includes the settlements of Cargan, Martinstown and Newtowncrommelin) and a social rented need of 15 in Islandmagee (this area includes the settlements of Ballystrudder and Mullaghboy).

Housing Strategic Subject Policies

7.40 The following section provides explanation and justification of selected housing strategic subject policies where a different approach has been taken to that indicated in a POP preferred option or key issue, and also where amendments to existing planning policies have been made which were not proposed within the POP policy review. In addition, Appendix H illustrates how all of the housing proposals and policies and related Policies CS1 and GP1 have evolved/ been amended through the outworking of the LDP process to date, including Sustainability Appraisal.

Housing in Settlements

- 7.41 The POP included a review of the existing regional housing policies and made recommendations as to whether to bring these policies forward with or without amendments. The public/consultees were also asked a number of questions about existing policy to assist with formulation of policy wording for the Plan Strategy.
- 7.42 The draft Plan Strategy contains a number of strategic subject policies for housing in settlements to secure good design and increased housing density without town cramming and to nurture the development of balanced communities. It is noted that some of these subject policies also apply/partly apply to proposals in the countryside i.e. Policy HOU3 Residential Extensions and Alterations, Policy HOU7 Adaptable and Accessible Homes and Policy HOU8 Travellers Accommodation.
- 7.43 The majority of existing regional urban housing policies have been brought forward in the draft Plan Strategy but have been amended to take account of the SPPS and our new General Policy. Appendix H illustrates how the urban housing policies have evolved through the outworking of the LDP process to date, and provides the rationale where amendments have been made to the POP preferred options and to existing planning policies.

Policy HOU5 Affordable Housing in Settlements

- 7.44 The SPPS states that the LDP process is the primary vehicle to facilitate any identified affordable housing need by zoning land or by indicating through key site requirements, where a proportion of the site may be required for social/affordable housing. It is also noted that this will not preclude other sites coming forward through the development management process.
- 7.45 Whilst our preferred option at POP stage was for 'every tenth unit within housing developments to be a social housing unit' in settlements where a need had been identified, this approach evolved as the draft Plan Strategy was progressed through further analysis and discussion with NIHE.
- 7.46 NIHE agreed that policy requiring the provision of affordable housing was only required in settlements where such a need was identified through the HNA, therefore an analysis of potential yield for affordable housing considered those settlements where the NIHE Housing Needs Assessment (December 2018) identified a need for social rented housing. As a starting point this analysis concentrated on potential yield from undeveloped housing zonings and urban capacity sites in these settlements. Whilst there are other sources that could contribute to meeting the social rented housing need, for example land within the urban fringe, this analysis has concentrated on the existing urban footprint as per SGS5 Management of Housing Supply which focuses growth on these areas.
- 7.47 Different quotas were applied to these initial yield figures to compare how much of the social rented need would be met by them. This analysis illustrated that in some settlements, need significantly exceeds the potential yield, and in some cases there is not enough land within the current settlement limits to accommodate this need (see paragraph 7.39 on how this may be addressed).

Technical Supplement 3

- 7.48 Further discussion with NIHE was centred on the appropriate quotas for provision and it was agreed in principle that a tailored approach would be appropriate according to the status of the settlement in the settlement hierarchy. For the main towns, initially a requirement of 25% was considered following analysis of the yield figures, however NIHE indicated that this may impact on the viability of schemes for developers and that, in their experience, 20% would be more appropriate. In terms of the small towns, initially a quota of 15% was considered but given there is a significant need in these settlements, it was decided that 20% would be more appropriate. Also this would bring the quota in line with the main towns. In terms of the villages, 10% was agreed with NIHE as an appropriate quota. Small settlements were also be included at the request of NIHE, although it is recognised that there are likely to be few applications in these settlements for more than 10 dwellings.
- 7.49 It is recognised that the quotas in Policy HOU5 will not meet 100% of the social rented housing need. However, the justification and amplification of the policy also allows, where necessary, for a higher proportion of affordable housing to be sought at LPP stage through key site requirements attached to specific housing zonings. NIHE acknowledged that planning policy and the private sector will not necessarily meet all social rented housing need and a proportion will continue to be delivered directly through housing associations.

Policy HOU7 Adaptable and Accessible Homes (also applies to proposals in the countryside)

- 7.50 Regional planning policy highlights that the planning system has a positive role to play in the delivery of homes to meet the full range of housing needs of society. This includes provision for those who are elderly, disabled or with mobility issues.
- 7.51 Our population is ageing, and as previously stated it is projected that 24% of the population in the Borough will be 65 and over. To address meeting the housing needs of the general population who require a wheelchair standard dwelling and also the needs of an ageing population, the POP included a preferred option which proposed that all ground floor apartments in blocks of two storey and above should be to wheelchair standards. The preferred option received support from the public and consultees.
- 7.52 During preparation of the draft Plan Strategy, discussions took place with Council's Building Control section to consider in detail the implications of bringing forward a policy for wheelchair standard units in terms of the assessment and enforcement of these standards. The outcome of these discussions was that due to the technical nature of these standards, it would not be practical to bring forward such a policy at this time.
- 7.53 In light of the above discussions, the approach of the draft Plan Strategy is to require all new residential properties to conform to a number of Lifetime Homes Standards through Policy HOU7 Adaptable and Accessible Homes. Lifetime Homes Standards are a nationally recognised set of 16 design criteria to ensure new dwellings are adaptable enough to accommodate a household's changing lifetime needs and enable them to be lived in and visited by people with varying degrees of mobility. It has already been a requirement for housing associations in Northern Ireland to build to full Lifetime Homes standards since 1998. In 2015 Lifetime Homes Standards in England and Wales were superseded by a national standard for accessible and adaptable dwellings incorporated within the Building Regulations.
- 7.54 Existing Building Regulations (Northern Ireland) 2012 focus on ensuring dwellings are accessible for visitors and only some of the Lifetime Homes Standards are included within them, therefore at present there is not the same onus on private developers to provide homes that would meet a broader range of needs within our society.
- 7.55 Lifetime Homes Standards also present practical difficulties in terms of their assessment and enforcement through the planning system given their technical nature. Each Lifetime Home Standard was therefore discussed in detail with Council's Building Control section in terms of cross over with existing Building Control regulations and guidance, and practical application and enforcement (see Appendix F).

- 7.56 It was considered that there were elements of five of the 16 Lifetime Homes Standards that could be assessed and enforced (by planning staff) and these have therefore been incorporated into Policy HOU7. It is acknowledged that Policy HOU7 does not include all 16 of the Lifetime Homes Standards. To introduce all of these would lead to competing standards with Building Control Regulations and guidance and could cause confusion. Mainland UK experience would show it is more appropriate to secure Lifetime Homes Standards via Building Regulations rather than through planning policy. Essentially, this is because the planning application stage is considered too early in the development process to consider all the necessary detail.
- 7.57 It is the intention of Policy HOU7 that homes are accessible for those who live in them and will apply to all proposals for new dwellings, flats and apartments including single dwellings in the countryside. Through this policy the draft Plan Strategy seeks to increase the amount of housing stock which is adaptable and accessible, that will meet the needs of all and which will allow people to remain in their homes for as long as possible.
- 7.58 NIHE have advised that there is limited research on the costs of Lifetime Homes properties but a NI study³ in 2002 estimated the extra building costs to be between £165 and a maximum of £545 per dwelling. However several UK studies have produced higher estimates ranging from £545 to £1615 per dwelling⁴. The most significant factor influencing costs was whether the home had been designed to incorporate Lifetime Homes Standards from the outset or whether a standard design had been modified. 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.
- 7.59 No concerns were raised in regards to Policy HOU7 at the Project Management Team meeting on 27 March 2019. However, NIHE indicated that further consideration should be given to a requirement for a proportion of wheelchair standard dwellings. As stated above it was decided that it would not be practical to bring forward such a policy at this time. They also requested that the justification and amplification of HOU7 should be revised to remove the reference to exceptional circumstances in cases where it may not be feasible to meet all of the criteria, as this could undermine the policy. However, it was decided that provision for exceptional circumstances is necessary to ensure reasonable flexibility, for example some house types e.g. townhouses with internal garage it may not be possible to have a living space on the entrance level.
- 7.60 At the Councillor Workshop on 31 January 2019, members were generally supportive of Policy HOU7 but they considered minimal additional design regulations should be included in the policy to ensure the policy is not overly prescriptive and is flexible. The justification and amplification of Policy HOU7 therefore states that there may be exceptional circumstances when not all of the policy criteria be accommodated and that such cases will be considered on their own merits, which allows for a degree of flexibility.

Housing in the Countryside

- 7.61 The POP included a review of the existing regional housing policies and made recommendations as to whether to bring these policies forward with or without amendments. The public/consultees were also asked a number of questions about existing policy to assist with formulation of policy wording for the Plan Strategy.
- 7.62 The draft Plan Strategy contains a number of strategic subject policies for housing in the countryside to meet the essential needs of rural communities while protecting the environment and rural character. These subject policies reflect the policy approach of the SPPS to cluster and consolidate and group of new development with existing established buildings. The element of the SPPS which promotes the reuse of

³ Lifetime Homes in Northern Ireland: Evolution or Revolution – O'Brien, P; Blythe A and M^cDaid, S report commissioned by the Joseph Rowntree Foundation and Chartered Institute of Housing in Northern Ireland

⁴ http://www.lifetimehomes.org.uk/pages/costs.html

previously used buildings is dealt with under Policy HE8 Non-listed Locally Important Building or Vernacular Building (see Technical Supplement 13).

- 7.63 The majority of existing regional rural housing policies have been brought forward in the draft Plan Strategy but have been amended to take account of the SPPS. Appendix H illustrates how the rural housing policies have evolved through the outworking of the LDP process to date, and provides the rationale where amendments have been made to the POP preferred options and to existing planning policies.
- 7.64 There are two rural housing policies (Policies HOU10 and HOU13) which have been amended from existing regional planning policy as contained in PPS21 to better align with the draft Plan Strategy Spatial Growth Strategy and also to provide greater clarification.

Policy HOU10 Dwelling on a Farm Business

- 7.65 The POP review of the existing regional planning policy relating to farm dwellings (CTY10 of PPS21) proposed to bring forward the existing wording of CTY10 with the following amendments:
 - Update to include the SPPS definition of agricultural activity; and
 - State the information required to demonstrate an active and established farm.
- 7.66 The POP also asked the public/consultees specifically whether they considered a stricter integration test should be applied to those exceptional sites located elsewhere on the farm. The majority of the public and consultees considered a stricter test should be applied in such instances.
- 7.67 Further to the above, Policy CTY10 was evaluated to assess if further amendments beyond that proposed in the POP were necessary. From discussions held with development management planning staff and also the analysis of Commissioner's reports made by the Planning Appeals Commission into farm dwellings appeals, it was apparent that the existing regional policy contained a number of ambiguities. Policy HOU10 now addresses these ambiguities, and the existing regional policy has been amended as follows:
 - Policy HOU10 and its justification and amplification (J&A) are explicit that this policy relates to a dwelling on a farm business, rather than just a farm.
 - The policy states that the farm business must be currently active and also that it has been active and established for the last six years i.e. preceding the application.
 - The J&A defines what constitutes a farm business in that applicants should have a Category 1 Business ID number. Category 1 Business ID numbers are only allocated where DAERA is fully satisfied that the business will operate as a fully separate and independent business both in status and practice.
 - The J&A also details the evidence that may be required to justify an active farm business in the absence of a Category 1 Business ID number.
 - Policy HOU10 states that all proposals will be required to meet the General Policy and therefore clearly sets out that all proposals for a dwelling on a farm business will be assessed in terms of integration.
- 7.68 As Policy HOU10 only makes provision for a dwelling to be granted permission on a genuine farm business it is anticipated that this may reduce the number of new dwellings in the countryside, in line with the draft Plan Strategy Spatial Growth Strategy.

Policy HOU13 Ribbon/Infill Development

- 7.69 Existing regional planning policy (CTY8 of PPS21) allows for the development of a small gap site up to a maximum of two houses. The POP review proposed to bring forward the existing wording with the following amendments:
 - Clarify that only substantial buildings will constitute part of a substantial and built up frontage;
 - Clarify this is a visual test; and
 - Clarify buildings inside settlement limits cannot be used to support proposals for infill development.

- 7.70 The POP also asked the public/consultees specifically whether they agreed that substantial buildings should be counted as part of the built up frontage and if the policy should include a visual test. The majority of the public and consultees agreed with both recommendations.
- 7.71 Further to the above, Policy CTY8 was analysed in the context of local circumstances in Mid and East Antrim. In the five year period from 2012 – 2017 a total of 101 infill dwellings were approved, and of those 36 were for development of a gap for two dwellings. If this past trend was to continue it could result in the approval of a further 202 infill dwellings by the end of the plan period, of which potentially 72 could be in infill sites large enough to accommodate two dwellings.
- 7.72 Policy HOU13 presented an opportunity to reduce this quantity of new dwellings in the countryside in line with our Spatial Growth Strategy and Strategic Housing Allocation Strategy. Therefore the policy has been worded to allow for the development of a gap site to accommodate only one dwelling. In addition, Policy HOU13 incorporates the amendments proposed in the POP policy review in that buildings within a substantial and built up frontage must be visually linked. The justification and amplification clarifies the meaning of substantial buildings, including that they cannot include dwellings located within settlement limits. The new policy also provides clarity on the meaning of the term 'common frontage'.

Policy HOU16 Affordable Housing in the Countryside

- 7.73 The POP review of the existing regional planning policy in PPS21, Policy CTY5 Social and Affordable Housing in the Countryside proposed to bring forward the existing wording of CTY5 in the draft Plan Strategy. Policy CTY5 allows for a group of up to 14 dwellings adjacent to small settlements of a population less than 2,250.
- 7.74 During preparation for the draft Plan Strategy, analysis was carried out to establish whether the threshold of 14 was appropriate in the context of Mid and East Antrim, where all villages and small settlements have a population less than 2,250. The maximum number of dwellings allowed under the current policy context was compared against the existing number of households in the villages and small settlements within the Borough (see Appendix D). This analysis indicated that an increase of 14 dwellings could be significantly out of proportion in some of the smaller settlements and this could have a detrimental impact on their character. In addition they would not have the services to sustain such an increase.
- 7.75 In light of this analysis, discussions took place with NIHE to establish whether it would be viable to reduce the threshold in regard to small settlements. Initially a maximum figure of up to six dwellings was suggested as an appropriate threshold adjacent to a small settlement. However, NIHE advised this may not be viable and for the purposes of Policy HOU16 it was agreed that a group of no more than eight affordable dwellings adjacent to a small settlement was appropriate. The analysis indicated that an increase of 14 would not have a significant impact on the character of the villages within the Borough so in consultation with NIHE, Policy HOU16 allows for a group of no more than 14 dwellings adjacent to a village.

8.0 Soundness

8.1 The draft Plan Strategy has been prepared so as to take due regard to meeting the tests of soundness as set out in the DfI Development Plan Practice Note 6: Soundness (Version 2, May 2017). The draft Plan Strategy insofar as it relates to the Strategic Housing Allocation Strategy and related strategic policies and housing subject policies is regarded as sound, because it meets the various tests of soundness as summarised below:

Table 8.1 Consideration of Soundness

	ural Tests
P2	The Strategic Spatial Proposals/Policies SGS3 Strategic Allocation of Housing to Settlement, SGS4 Protection of Zoned Housing Land, SGS5 Management of Housing, Strategic Policy CS1 Sustainable Development in the Countryside and the strategic subject policies relating to housing (Policy HOU1 – HOU16) have evolved from the POP and POP Public Consultation Report as described in section 5.0 this document.
Р3	The strategic housing proposals/policies and housing subject policies have been subject to Sustainability Appraisal. Further detail is included in the Sustainability Appraisal Report.
Consist	ency Test
C1	The strategic housing proposals/policies and housing subject policies have taken account of the RDS, particularly RG6 – 8 and SFG12 – 13 and the accompanying revised HGI figures published by DfI in April 2016. Refer to paragraphs 2.2 – 2.7 of this document.
C2	The strategic housing proposals/policies and housing subject policies have taken account of our Community Plan, particularly in relation to the main themes of improving health and wellbeing and promoting community safety and cohesion. Regard is also had to respect for our environment. Refer to paragraphs 2.32 – 2.34 of this document.
C3	The strategic housing proposals/policies and housing subject policies have taken account of the SPPS and existing regional planning policies relating to housing.
C4	The strategic housing proposal/policies and housing subject policies have had regard to the existing development plans and Council strategies relating to housing within Mid and East Antrim and the emerging proposals of neighbouring Councils. Refer to paragraphs 2.22 – 2.30 of this document.
Cohere	nce and the effectiveness tests
CE1	The strategic housing proposal/policies and housing subject policies have taken account of the emerging LDP's of our three neighbouring Councils and it is not considered to be in conflict with them. Refer to paragraphs 2.35 – 2.39 of this document.
CE2	The strategic housing proposal/policies and housing subject policies are founded on a robust evidence base including the POP and responses to it, an urban capacity study, an urban fringe study, an undeveloped housing zoned housing land audit, various reports from NIHE (HIP, HNA and HMA) and consultation with consultees including NIHE and DfI.
CE3	The Monitoring Framework (indicators 1 and 4 - 6) within Technical Supplement 1 illustrates how the spatial distribution of new housing, supply of housing land, number of dwellings approved by size and number of affordable homes approved/built will be monitored.
CE4	Housing provision will be reviewed at Plan Review stage, with potential for the re-designation of phase 1 housing land and the release of phase 2 housing land in the larger settlements to take account of changing circumstances while ensuring that there is sufficient provision of housing. Housing policies will also be reviewed to assess whether they are achieving their intended aims.

Housing

APPENDICES

APPENDIX A Glossary

Term/Abbreviation	Definition
Affordable Housing	Comprises of social rented housing and intermediate housing (see separate definitions below).
Brownfield Sites	Sites within a settlement limit which are or were occupied by a permanent structure. These for example may include underused buildings or vacant buildings. May also be referred to as 'Previously Developed Land'.
Density	Measure of the number of dwellings per hectare.
Housing Association (HA)	A housing association is an independent, not-for-profit social business that provides both homes and support for people in housing need, as well as key community services. Housing associations build virtually all NI's new affordable homes e.g. social rented or intermediate housing.
Housing Needs Assessment (HNA)	An assessment by NIHE of local housing needs primarily in relation to general needs social rented, intermediate and supported housing and travellers.
Intermediate Housing	Currently consists of <i>shared ownership housing</i> 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 affordable housing obligations of the policies in the LDP.
Social Rented Housing	This is housing that is provided at an affordable rent by a registered housing association; that is, one which is registered and regulated by DfC as a social housing provider. Social rented accommodation should be available to households in housing need and is offered in accordance with the common selection scheme, administered by NIHE, which prioritises households who are living in unsuitable or insecure accommodation.
Travellers	A generic group as defined by the Race Relations (NI) Order 1997 i.e. "having a shared history, culture and traditions, including a nomadic way of life".
Urban Capacity Study	A study undertaken as part of the LDP process which provides a comprehensive analysis of the potential for future housing growth within the urban footprint/built up areas of larger settlements.
Urban footprint	The continuous built up area of the settlement for towns and cities throughout NI. The boundary will be represented by an uninterrupted line, often lying inside the planned settlement limit. The urban footprint contains land which has a formal urban use including land on the edge of the settlement where it forms part of the curtilage of a building. However, this does not necessarily imply that gardens are acceptable for housing development. Undeveloped zoned land at the edge of the settlement will be excluded. Urban footprints have been identified and use a 2012 baseline.
Whiteland	This term refers to undeveloped land that was previously included within a development limit but was not zoned for a specific use.
Windfall Sites	Sites that are neither zoned nor anticipated during the formulation of the LDP but which may become available during the lifetime of the plan.

APPENDIX B

Table B1 Breakdown of Mid and East Antrim Housing Stock (2011)

	Total Households	Detached	Semi- Detached	Terraced	Flats	Other*
Northern	703,275	264,307	200,577	174,896	62,386	1,109
Ireland		37.6%	28.5%	24.9%	8.9%	0.2%
Mid and East	54,314	22,773	13,760	12,982	4,732	67
Antrim		41.9%	25.3%	23.9%	8.7%	0.1%
				33% combin	ed (rounded)	

Source: NISRA Census 2011 Accommodation Type - Households: QS402NI (administrative geographies)

Notes: (1) In general, a household's accommodation is defined as an unshared dwelling if all the rooms are behind a door that only that household can use. (2) Other* includes caravan, mobile or temporary structure or shared house

Table B2 Breakdown of Mid and East Antrim Housing Stock (April 2018)

	Total Households	Detached	Semi- Detached	Terraced	Flats	
Northern Ireland	790,328	281,526	197,972	226,340	84,490	
Mid and East Antrim	59,538	23,708 39.8%	13,127 22.0%	16,680 28.0%	5,843 9.8%	
				38% combined (rounded)		

Source: DoF (LPS) https://www.finance-ni.gov.uk/publications/annual-housing-stock-statistics

APPENDIX C

Figure C1 Social rented housing waiting list trends in Mid and East Antrim



Source: NIHE











Source: NIHE Note: Does not include supported housing schemes

APPENDIX D Settlement populations (2011)

Main Towns (3)	Ballymena Carrickfergus Larne	(29,467) (27,903) (18,705)		
Small Towns (5)	Ahoghill Broughshane Cullybackey Greenisland Whitehead	(3,403) (2,851) (2,569) (5,484) (3,786)		
Villages (11)	Ballycarry Ballygalley Ballystrudder Cargan Carnlough Clough	(1,371) (818) (922) (588) (1,512) (220)	Glenarm Glynn Kells/Connor Martinstown Portglenone	(345)
Small Settlements (17)	Buckna* Carnalbanagh Carncastle Craigywarren Crosshill Glarryford* Glenoe Grange Corne Magheramor	(101) * (29 dwellings) (105) er (468)	Milltown* Moorfields* Mounthill Mullaghboy Newtowncrou Raloo Slaght* Woodgreen*	(114) (364) mmelin* (18 dwellings)

Source: NISRA 2011 Census and count of dwellings in small settlements with no population data Settlements with population of 2,250 (or less)

*New small settlements – considered as being in the open countryside until new settlement limits identified in Local Policies Plan

APPENDIX E Housing Evaluation Framework (HEF) Methodology

The six HEF tests have been used as the basis of a broad scoring system to inform the allocation of housing between settlements within each tier. The broad scoring system is based upon the following:

- The RDS does not require weighting of the tests and therefore equal weight has been given to each individual HEF test.
- Within each of the six HEF tests, a series of assessments have been carried out, and where necessary these have been tailored to take account of the variation in the size, form and function between the different tiers of the settlement hierarchy.
- Each settlement within the top three tiers of the settlement hierarchy has been judged and given a plus, nil or minus percentage of up to a maximum of +5%/-5% for each of the six HEF tests.
- Within each test, if all of the settlements in any one tier received the same overall plus or minus score, it was not considered necessary to apply these scores as it would not have made a difference when comparing the overall scores for these settlements and a nil score was instead applied.
- Comparisons of settlements have only been made against other settlements within the same tier.
- The percentage scores for each of the tests have then been totalled to provide an overall percentage score for each settlement.
- The overall percentage score for each settlement has then been applied to the preliminary allocation figure which had been given to each settlement based on their share of households in 2011, and this equates to the revised housing allocation for each settlement.

Whilst the RDS only refers to the use of the HEF for main towns and small towns it was considered appropriate to extend the evaluation to the villages. However, as noted above the assessments have been tailored where necessary so that for examples villages were not being assessed against the same parameters as the main towns. The HEF has not been applied to the small settlements tier and the housing allocation for the small settlements is solely based on the share of households in 2011, and is presented as a cumulative figure.

Table E1 Application of the Housing Evaluation Framework

Housing Evaluation Framework Test	Assessment
Resource Test	For all tiers this assessment looked at two aspects, both were scored individually. These scores were totalled to provide an overall score for this assessment:
	Community Assets Each settlement was assessed based on the whether it benefitted from having each of the following facilities: primary school, community centre/hall, library, leisure centre and health centre/GP surgery. These particular facilities were selected on the basis that they were considered to be community assets.
	Each settlement was categorised by the cumulative total of these facilities within them and scored accordingly.
	Physical Infrastructure The RDS highlights that proposed housing development will be dependent on the availability of all necessary infrastructure. Whilst the HEF resource test refers to several types of physical infrastructure, this assessment focuses solely on WwTW capacity as it was considered to be the key resource that should be assessed and in addition, it will vary to a greater extent from settlement to settlement.
	Each settlement was assessed in terms of the current status and capacity for future growth of the WwTW which they are served by and categorised and scored accordingly. The assessment also

	took account of those settlements which are not served by a WwTW. This assessment was based upon information supplied by NI Water in November 2018.
	Note: since the application of the HEF tests, NI Water provided updated WwTW capacity information in August 2019. This has resulted in the current status of Cargan WwTW being changed from green to red, however this would not have a significant impact on the overall score of Cargan.
Environmental Capacity Test	For all tiers this assessment looked at two aspects, but not all settlements were assessed against both of these. Where applicable, these scores were totalled to provide an overall score for this assessment:
	Capacity for Growth in Existing Urban Areas Given the emphasis of the RDS is to develop high quality housing within existing urban areas it was considered that this should be the main consideration under this test.
	All settlements were firstly assessed via a desktop exercise in terms of their capacity for growth on unconstrained land in existing urban areas ¹ , to produce a total potential housing yield for each settlement. This yield was calculated by applying various densities taking account of the character of the particular settlement, and was refined using planning judgement.
	These total figures were then used to compare settlements within each tier and a planning judgement was made as to which settlements were deemed to have a high, medium or low level of unconstrained land within existing urban areas and were scored accordingly.
	Capacity for Outward Growth Whilst the HEF test specifically refers to accommodating outward growth, it was considered that this would only be relevant if a settlement would not have the ability to accommodate growth within unconstrained land within existing urban areas. It was therefore considered it would not be appropriate to penalise a settlement for not being able to expand outwards if it had sufficient capacity to grow within existing urban areas.
	Only those settlements who scored low under the initial assessment were then assessed as to the percentage of unconstrained land in relation to the overall length of the existing development limit. They were scored as to whether this percentage was more or less than 50%.
	¹ Land within existing urban areas was classed as undeveloped housing zonings, urban capacity sites and urban fringes and was informed by the Undeveloped Zoned Housing Land Audit (2018) and Urban Capacity Study (2018) and Urban Fringe Study (2019). In the case of villages, where no urban footprint has been identified, an estimate was made in regards to remaining whiteland within existing settlement limits.
Transport Test	The main towns were assessed against one aspect. The small towns and villages were assessed against two aspects, which were scored individually and totalled to give the overall score.
	<u>Main Towns</u> Walking is considered to be the most appropriate measure of accessibility within the main towns and currently people are more likely to walk than cycle. Walking also provides greater health benefits than public transport. This assessment therefore considered the amount of undeveloped zoned housing land which is within 15 minute walk from the town centre.

	Small Towns and Villages
	Public Transport Travel Time
	As the HEF transport test focuses on reducing reliance on the car, an assessment was carried out as to the length of time to travel by public transport from each settlement to the nearest main
	town centre.
	It was considered that a quicker travel time would be more likely to encourage the use of public transport. Public transport was considered as the most appropriate measure of accessibility between settlements and the main town centres were selected as the destination for this assessment given they have a greatest level of service provision and facilities that people will travel to.
	For those settlements not served by public transport, the travel time includes the time it would take to walk to from the settlement to the nearest public transport stop/station.
	Presence of Train Station
	In addition to considering the travel time to the nearest main town centre, each settlement was
	further assessed as to whether it has a train station (or one within 1km, which was judged to be a reasonable distance to walk). It was considered that ease of access to a train station would encourage the use of public transport beyond the Borough e.g. to Belfast which would help to reduce reliance on the car.
Economic	Main Towns
Development Test	In terms of the main towns two tests were applied, which were scored individually and totalled to give an overall score for this assessment:
	Employment Land The RDS highlights that to accommodate growth in jobs and businesses there should be an adequate and available supply of employment land. The first sub test therefore assessed the amount of undeveloped zoned industrial land and land last used for industry, which is aimed at considering and assessing the amount of industrial land that is available within the main towns which could potentially facilitate strategic development opportunities.
	Small Business Workspace Capacity The study carried out for Mid and East Antrim Borough Council by Ulster University ('Assessing Employment Space Requirements across the Council 2017 – 2030' November 2018) highlighted that the demand for additional workspace is expected to rise within the Borough.
	The second sub test therefore focused on the remaining capacity of small business workspace units within existing estates, and a planning judgement was made on each of these and they were then categorised and scored accordingly.
	Small Towns and Villages It is less likely that strategic development opportunities will occur within small towns and villages and therefore for these tiers the assessment focuses on sources of employment within these tiers as this would contribute to the housing and jobs balance.
	Small Towns
	The small towns assessment was aimed at establishing whether there were any sources of additional employment potential beyond retail/services and the degree of employment these sources bring to the settlement they are located within as. A planning judgement was made as to the cumulative level of employment from these source(s) in each settlement and they were categorised and scored accordingly.

	This assessment excluded employment from retail shops and services as it was considered the settlements within this tier have a similar level of retail/service provision and would therefore provide limited comparison.
	Villages In addition to the sources of employment from businesses, enterprises etc. as per the small towns, a further assessment was applied to the villages which considered the cumulative quantity of convenience, comparison and retail services within each settlement. This was used as a measure as to the potential level of employment within this tier.
Urban and Rural Character Test	The RDS acknowledges that settlements have unique identities and that housing growth must be managed to ensure it does not have an impact on local character.
	Certain settlements may have a distinct sense of place due to their character of their built and natural environment, their street patterns and their historical and architectural heritage. It is important that new housing does not detract from the character and sense of place of settlements.
	This assessment considered several aspects of all settlements, firstly whether they have a distinct sense of place, secondly if they can accommodate future growth without having an impact upon their sense of place and thirdly if they have reached their capacity in terms of growth.
	A planning judgement was made on each settlement as to whether it had a distinct sense of place or not, and also whether new development could be accommodated without impacting on their sense of place. The assessment of whether a settlement has reached their capacity for growth was based on the Urban Capacity Study (2018).
	All of these aspects were considered for each settlement and they were then categorised and scored accordingly.
Community Services Test	A judgement was made using local knowledge to establish the community service and function role of each settlement for example hub, market town, serves a rural hinterland etc. However when the service and function of each settlement was judged against other settlements within the different tiers, it was considered that there was not any particular service/function of a settlement that warranted giving any settlement a positive or negative score. Under this test all settlements have therefore been given a nil score.
	A quantitative assessment of community service provision within each settlement was considered under the Resource Test.

Table E2 Breakdown of Housing Evaluation Framework Scores

	M	Main Towns Small Towns					Villages												
	Ballymena	Carrickfergus	Larne	Greenisland	Whitehead	Ahoghill	Broughshane	Cullybackey	Kells/ Connor	Carnlough	Ballycarry	Portglenone	Ballystrudder	Ballygalley	Glynn	Glenarm	Cargan	Martinstown	Clough
Environmental Capacity	+5%	+5%	+5%	+5%	-2.50%	+2.50%	Nil	+5%	+2.50%	+5%	+5%	+2.50%	+2.50%	-2.50%	+2.50%	-2.50%	+2.50%	Nil	+2.50%
Resource	+2.50%	Nil	-2.50%	Nil	Nil	Nil	Nil	Nil	+5%	+5%	+2.50%	+5%	+2.50%	-2.50%	-2.50%	+2.50%	Nil	Nil	-2.50%
Transport	-5%	-5%	-5%	+5%	+5%	+2.50%	+2.50%	+5%	+2.50%	-2.50%	+2.50%	Nil	+2.50%	+2.50%	+5%	Nil	Nil	Nil	Nil
Economic Development	+2.50%	+2.50%	+5%	Nil	Nil	Nil	Nil	+5%	+2.50%	+5%	-2.50%	+2.50%	Nil	Nil	-5%	+2.50%	-5%	-2.50%	-5%
Urban and Rural	Nil	Nil	Nil	Nil	-5%	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	-5%	Nil	-5%	Nil	Nil	Nil
Community Services	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
TOTAL	+5%	+2.5%	+2.5%	+10%	-2.5%	+5%	+2.5%	+15%	+12.5%	+12.5%	+7.5%	+10%	+7.5%	-7.5%	No change	-2.5%	-2.5%	-2.5%	-5%

Note: The sections highlighted in grey relate to those instances where all settlements within the same tier scored the same and therefore no score was applied for this test.

	Baseline Allocation Figure (BAF) (based on 2011 census)	Overall HEF score	Adjusted HEF figure	Total of adjusted figures	% of each settlements share of adjusted figure	Adjusted Housing allocation based on the application of revised % to original BAF	Adjusted figure rounded up/down
Main Towns - O	verall Housing Allocati	ion for this tier	- 4,636				
Ballymena	1,765	+5%	1,853.25		1,853.25 / 4796.02 = 38.64%	38.64% of 4636 = 1,791.35	1,791
Carrickfergus	1,682	+2.5%	1,724.05	4,796.02	1,724.05 / 4796.02 = 35.95%	35.95% of 4636 = 1,666.64	1,667
Larne	1,189	+2.5%	1,218.72		1,218.72 / 4796.02 = 25.41%	24.41% of 4636 = 1,178	1,178
Small Towns - O	overall Housing Allocat	ion for this tier	- 1,122				
Greenisland	343	+10%	377.3		377.3 / 1187.67 = 31.77%	31.77% of 1122 = 356.46	357*
Whitehead	241	-2.5%	234.97	-	234.97 / 1187.67 = 19.78%	19.78% of 1122 = 221.93	222
Ahoghill	194	+5%	203.7	1,187.67	203.7 / 1187.67 = 17.15%	17.15% of 1122 = 192.42	192
Broughshane	182	+2.5%	186.55		186.55 / 1187.67 = 15.71%	15.71% of 1122 = 176.27	176
Cullybackey	161	+15%	185.15	-	185.15 / 1187.67 = 15.59%	15.59% of 1122 = 174.92	175
Villages - Overa	ll Housing Allocation f	or this tier - 636		1		11	
Kells & Connor	127	+12.5%	142.87		142.87 / 674.68 = 21.17%	21.17% of 636 = 134.64	135
Carnlough	88	+12.5%	99	-	99 / 674.68 = 14.67%	14.67% of 363 = 93.30	93
Ballycarry	84	+7.5%	90.3	-	90.3 / 674.68 = 13.38%	13.38% of 636 = 85.09	85
Portglenone	78	+10%	85.8	-	85.8 / 674.68 = 12.72%	12.72% of 636 = 80.89	81
Ballystrudder	61	+7.5%	65.57	-	65.57 / 674.68 = 9.72%	9.72% of 636 = 61.82	62
Ballygalley	52	-7.5%	48.1	674.68	48.1 / 674.68 = 7.13%	7.13% of 636 = 45.34	45
Glynn	42	No change	42		42 / 674.68 = 6.22%	6.22% of 636 = 39.56	40
Glenarm	38	-2.5%	37.05		37.05 / 674.68 = 5.49%	5.49% of 636 = 34.92	35
Cargan	35	-2.5%	34.12		34.12 / 674.68 = 5.06%	5.06% of 636 = 32.18	32
Martinstown	17	-2.5%	16.57	1	16.57 / 674.68 = 2.45%	2.45% of 636 = 15.58	16
Clough	14	-5%	13.3	1	13.3 / 674.68 = 1.97%	1.97% of 363 = 12.52	12**

* this figure had to be rounded up to get the overall figure of 1,122, although it was not above .5 ** this figure was not rounded up to get the overall figure of 636, although it was over .5. In both cases the settlement with the closest % to .5 was selected for these minor adjustments.

APPENDIX F Assessment of Lifetime Homes Standards for inclusion in Policy HOU7 Adaptable and Accessible Homes

	Lifetime Home Criteria	External/ Internal	Assessment of Lifetime Home Criteria	Relevant HOU7 Criteria
1. Parking (width or widening capability)	 1a – 'On plot' (non-communal) parking Where a dwelling has car parking within its individual plot (or title) boundary, at least one parking space length should be capable of enlargement to achieve a minimum width of 3300mm. (can include adjacent path/grass that could be used to widen in future) and be firm surface 1b – Communal or shared parking Where parking is provided by communal or shared bays, spaces with a width of 3300mm, in accordance with the specification below, should be provided. 	External	Include 1b amended to read two out of every 20 communal or shared bays should be 3300mm wide.	a)
2. Approach to dwelling from parking (distance, gradients and widths)	The distance from the car parking space to the dwelling entrance, should be kept to a minimum and be level or gently sloping. The distance from visitors parking to relevant entrances should be as short as practicable and be level or gently sloping. (i.e. no gradient exceeding 1:60, and/or no crossfall exceeding 1:40).	External	Exclude Covered to some extent by Building Control Regulations.	N/A
3. Approach to all entrances	The approach to all entrances should preferably be level or gently sloping, and in accordance with the specification below. (no gradient exceeding 1:60 and/or no crossfall exceeding 1:40) or gently sloping. A 'gently sloping' approach may have a gradient of 1:12 for a distance of up to 2 metres and 1:20 for a distance of 10 metres, with gradients for intermediate distances interpolated between these values) On steeply sloping sites it is accepted that this requirement may not be practicable, or achievable, and should be discussed with the local planning authority to agree a workable solution.	External	Exclude Very onerous to have all approaches level or gently sloping. Goes beyond Building Control Regulations.	N/A
4. Entrances	 All entrances should: a) Be illuminated (diffused luminaries) b) Have level access over the threshold (max 15mm upstand); and c) Have effective clear opening widths (800mm) and nibs (300mm). In addition, main entrances should also: d) Have adequate weather protection (min depth 600mm) e) Have a level external landing (max gradient 1:60/and or max crossfall 1:40, min size 1200x1200mm). 	External	Exclude Partly covered by Building Control Regulations but goes beyond the detail for planning assessment. Also shelter standards at the main entrance could affect design/aesthetics of bespoke dwellings.	N/A
5. Communal stairs and lifts	 5a – Communal Stairs Principal access stairs should provide easy access in accordance with the specification below, regardless of whether or not a lift is provided (uniform rise not above 170mm, going 250mm handrail extend 300mm beyond top & bottom, height 900mm step nosing, closed risers). 5b – Communal Lifts Where a dwelling is reached by a lift, it should be fully accessible in accordance with the specification below (internal dimensions 1100x1400mm, controls between 900 and 1200mm and 400mm from internal front wall). 	Internal	Exclude Many of the stair standards are in Building Control Regulations and lift specifications go beyond detail for planning assessment and unenforceable through the planning system.	N/A
6. Internal doorways and hallways	Movement in hallways and through doorways should be as convenient to the widest range of people, including those using mobility aids or wheelchairs, and those moving furniture or other objects. As a general principle, narrower hallways and landings will need wider doorways in their side walls. The width of doorways and hallways should conform to the specification below (Halls 900mm, 750mm at pinch points, 1200mm communal area with 1050 at pinch points, Doors 750mm, angles 750mm, 300mm nib).	Internal	Exclude Some specifications are covered in Building Control Regulations but others go beyond and are similar to commercial building requirements. Goes beyond detail for planning assessment and unenforceable through the planning system.	N/A

7. Circulation Space	There should be space for turning a wheelchair in dining areas and living rooms and basic circulation space for wheelchair users elsewhere. (Living rooms turning circle of 1500mm/turning ellipse 1700mx1400mm, Kitchen clear width 1200m between kitchen units and obstructions, bedrooms capable to 750mm to both sides of bed for main bedroom and 750mm in other bedroom)	Internal	Partly include There should be space for turning a wheelchair in dining areas and living rooms. Demonstrating the remaining specification elsewhere goes beyond the remit of planning.	b)
8. Entrance level living space	A living room/living space should be provided on the entrance level of every dwelling.	Internal	Include with amendment A living room/living space shall be expected to be provided on the entrance level of every dwelling (this would allow for exceptions e.g. for townhouses).	с)
9. Potential for entrance level bed- space	In dwellings with two or more storeys, with no permanent bedroom on the entrance level, there should be space on the entrance level that could be used as a convenient temporary bed-space. (750mm wide space to one site of bed, electrical socket within space)	Internal	Exclude Goes beyond remit of planning and not in current Building Control Regulations.	N/A
10. Entrance level WC and shower drainage	Where an accessible bathroom, in accordance with Criterion 14, is not provided on the entrance level of a dwelling, the entrance level should have an accessible WC compartment, with potential for a shower to be installed – as detailed in the specification below = details of WC size with WC/basin, floor construction for shallow fall	Internal	Exclude Building Control Regulations require WC at entrance level but not shower (increasing size for a potential shower could significantly increase the size of downstairs toilets). Details for the shower go beyond planning assessment.	N/A
11. WC and bathroom walls	Walls in all bathrooms and WC compartments should be capable of firm fixing and support for adaptations such as grab rails.	Internal	Exclude Goes beyond remit of planning.	N/A
12. Stairs and potential though- floor lift in dwellings	The design within a dwelling of two or more storeys should incorporate both: a) Potential for stair lift installation; and, (900mm clear width on stairs, 450mm above pitch height) b) A suitable identified space for a through-the-floor lift from the entrance level to a storey containing a main bedroom and a bathroom satisfying Criterion 14. (min 1000mmx1500mm, knock out panel in concrete floor)	Internal	Exclude Building Control will seek lift specifications if lift proposed. LTH exceeds this. Details go beyond remit of planning.	N/A
13. Potential for future fitting of hoists and bedroom / bathroom relationship	Structure above a main bedroom and bathroom ceilings should be capable of supporting ceiling hoists and the design should provide a reasonable route between this bedroom and the bathroom.	Internal	Exclude Building Control could check if additional loading requirements were stated but unenforceable through the planning system.	N/A
14. Bathrooms	An accessible bathroom, providing ease of access in accordance with the specification below, should be provided in every dwelling on the same storey as a main bedroom (specifications about position of WC, wash basin, bath/floor level shower).	Internal	Include an accessible bathroom on the same floor as the main bedroom.	e)
15. Glazing and window handle heights	Windows in the principal living space (typically the living room), should allow people to see out when seated. (Glazing starting no higher than 800mm above floor level) In addition, at least one opening light in each habitable room should be approachable and usable by a wide range of people – including those with restricted movement and reach (750mm wide approach route).	Internal	Include first element and amend to state: The principle window in the principle living space should be sited to enable outlook when seated.	d)

16. Location of service controls	Service controls should be within a height band of 450mm to 1200mm from the floor and at least 300mm away from any internal room corner.	Internal	Exclude First part already in Building Control Regulations. Second part is not but very uncommon if they would be less than 300mm away from the corner of the room. Details go	N/A
			beyond remit of planning.	

APPENDIX G Affordable Housing in the Countryside threshold analysis

Settlement	Population 2011 (all 2,250 or less)	Households 2011 (house count in some small settlements)	+14	% increase in households/ houses
Villages				
Kells/Connor	2,053	808	822	2%
Carnlough	1,512	563	577	3%
Ballycarry	1,371	536	550	3%
Portglenone	1,147	498	512	3%
Ballystrudder	922	389	403	4%
Ballygalley	818	333	347	4%
Glynn	632	267	281	5%
Cargan	588	223	237	6%
Glenarm	564	242	256	6%
Martinstown	345	108	122	13%
Clough	220	90	104	16%
Small Settlements				
Grange Corner	468	191	205	7%
Mullaghboy	364	148	162	9%
Magheramorne	215	86	100	16%
Mounthill	114	46	60	30%
Glenoe	105	41	55	34%
Carncastle	101	36	50	39%
Crosshill	-	24	38	58%
Raloo	-	18	32	78%
Carnalbanagh	-	16	30	88%
Moorfields	-	81	95	17%
Woodgreen	-	70	84	20%
Newtowncrommelin	-	58	72	24%
Craigywarren	-	56	70	25%
Slaght	-	45	59	31%
Glarryford	-	37	51	38%
Buckna	-	27	41	52%
Milltown	-	21	35	67%

Note: Orange indicates increases more than 5% but less than 10% increase and red indicates more than a 10% increase.

Settlements in italics are proposed and their development limits have not yet been defined. Therefore for this exercise an approximate number of existing houses in the vicinity of the proposed settlements have been used and this may not be the final number of houses within the settlement when defined at Local Policies Plan stage.

APPENDIX H Evolution of relevant draft Plan Strategy policy (General Policy and Housing policies HOU1- HOU16, CS1, SGS4 – SGS5) **Current Operational Policy**

PPS 1: General Principles	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
Paragraph 3 - The public interest requires that all development is carried out in a way that would not cause demonstrable harm to interests of acknowledged importance.	Under the SPPS, the guiding principle for planning 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. The SPPS provides five core planning principles as well as strategic policy under 16 overarching subject matters. Across these principles and policies there are a number objectives such as good design and protecting amenity that apply to all development types.	It was recognised in the POP that there were a number of overlapping criteria across the various policies therefore it was suggested that these may be included within a General Policy in order to prevent duplication. It is recommended that consideration is given to bringing forward a General Policy in the LDP Plan Strategy.	No definitive comments received either for or against the inclusion of a General Policy. Post consultation Consideration It is recommended that consideration is given to bringing forward a General Policy in the LDP Plan Strategy.	 Policy GP1: General Policy for all Development New policy wording developed following the amalgamation of general policy criteria from across a number of existing policies such as PPS 3 AMP 1 and AMP 6, PPS 4 PED 9, PPS 7 QD1, PPS 16 TSM 7, PPS21 CTY 13, 14 &15, PPS 18 RE 2 as well as policies DES 2 and DES 10 in the PSRNI. The policy also takes account of planning principles included within PPS 12 and PPS 13. The proposed General Policy seeks to ensure that all development (except minor proposals) is sustainable, accords with the LDP and will not result in demonstrable harm to interests of acknowledge importance. This policy also provides operational policy for specific forms of development e.g. schools, which are not specifically catered for through other subject policies. The General Policy sets out criteria under five headings that all development (except minor proposals) must meet, where relevant. Development vithin the countryside must also meet a number of additional criteria which are particularly relevant to the rural context. Councillor & PMT Comments Some of the original policy criteria have been amended to take account of comments raised through Councillor workshops and meetings with consultees. However, this engagement did not change the overall shape or thrust of the General Policy.

PPS 7 Quality Residential Environments	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
Policy QD 1: Quality in New Residential Development Outlines specific policy criteria for the assessment of new residential developments in relation to site context, site characteristics, layout considerations, local neighbourhood facilities, form, materials and detailing, density, landscape design, public open space, private open space, movement, parking, privacy and security from crime.	SPPS sets out broad strategic policy with emphasis on the contribution that new housing development should strive for in meeting broader government objectives. These include the securing of sustainable forms of development and balanced communities. It also sets out the broad methodology for allocating housing land through the LDP and refers to meeting specific housing needs (e.g. through supported housing and traveller accommodation). In all of this the SPPS is more closely aligned with PPS 12: Housing in Settlements, than with the more design related focus of PPS 7. SPPS states that Councils should bring forward local planning policy or guidance for achieving quality in residential developments including residential extensions and alterations.	Policy QD 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. NIHE did however recommend that new policy requiring nearly zero energy housing, passive solar design and promoting the use of renewable energy could contribute to quality development and benefit the environment. NIHE also recommended that all dwelling units should be designed to Lifetime home standards (see review of Policy HS 4 in PPS 12 below). Consideration of NIHE proposals: Policy in regard to Zero Energy Homes was investigated, taking account of current building control standards, and at present is considered too high a standard to bring forward as policy in the LDP (See review of PPS 18 Policy RE 2 regarding energy efficient design). It is recommended that the wording of Policy QD 1 is amended to introduce an additional criteria promoting energy efficient design and SuDS where appropriate (see Key Issue 24), and brought forward in the LDP Plan Strategy. Alternatively, such criteria may be included in a general policy to apply to all new buildings. In addition, the amplification could provide direction to Creating Places and Living Places.	NIHE stated that they supported the amendments to QD 1 to introduce additional criteria to promote energy efficient design and the use of SuDS. They repeated their aspirations for all new housing to be beyond current building control standards to achieve SAP rating A and promote the use of renewable energy within developments. Post consultation consideration Further to previous consideration in regard to zero energy homes we will work closely with the relevant agencies including NIHE and Council's Building Control Department to investigate further how the LDP can promote energy efficient housing. We may bring forward amended policy if deemed appropriate.	 Policy HOU1: Quality in New Residential Development in Settlements - Amalgamation of 3 existing PPS 7 policies, QD1, QD2 and LC1. Policy HOU1 requires proposals to create a high quality, sustainable and safe residential environment. Sets out need for either a Design Concept Statement or a Concept Masterplan. Sets out that the density of proposals in Established Residential Areas should not be significantly higher (includes exceptions). All proposals must also meet Policy GP1: General Policy for all Development which includes much of the criteria from QD1 and additional criteria in relation to energy efficient design and SUDs. Councillor & PMT Comments No changes further to above consultations. NIHE are supportive of the policy, as a result of their feedback further clarification added to exceptions to established residential areas. Minor amendments also to the J&A to include reference to Design and Access Statements and Sustainable Design.
Policy QD 2: Design Concept Statements, Concept Master Plans and Comprehensive Planning Sets out the criteria for the submission of design concept statements, concept	The Planning (General Development Procedure) Order (Northern Ireland) 2015 makes the submission of a Design and Access Statement mandatory for all major applications or for proposals of 1 dwelling or more in a designated area, such as a	Policy QD 2 appears to be working well, however the threshold for triggering the requirement for a concept master plan (300 or more dwellings/15 hectares or more site area) is considered to be too high	The majority of statutory consultees and public respondents agreed with the amended threshold for the submission of a concept master plan. HED suggested there is potential for policy	

master plans and comprehensive planning as tools in achieving high quality housing schemes that are design- led and responsive to site characteristics and opportunities.	Conservation Area. SPPS does not provide the same level of detail as Policy QD2 and it does not differentiate between design concept statements for all housing development and concept master plans for larger developments. SPPS devalues the need for the submission of a concept statement by using the term 'should be sought' rather than 'will require' as in QD 2. It does however seek the design concept to incorporate sustainable elements such as good linkage to schools, community facilities etc., as well as promoting the use of SuDS and energy efficient design.	for Mid and East Antrim, where most housing proposals are significantly smaller. It is recommended that the wording of Policy QD 2 is amended to reduce the threshold for a concept master plan to 200 dwellings or above or on sites of 10 hectares and above. It is also recommended that the amplification to Policy QD 2 should be expanded to include reference to the need for good linkages to existing infrastructure and community facilities. Whilst new legislation requires housing developments over 50 units/over 2 hectares to submit a Design and Access Statement, failure to retain the wording of QD 2 could result in, housing proposals of less than 50 units/under 2 hectares not being required to submit a concept statement nor a Design and Access Statement.	consideration of a heritage led approach on appropriate sites and settings. Post consultation consideration Bring forward POP recommendation.	
Addendum to PPS 7: Residential Extensions and Alterations	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
Policy EXT 1: Residential Extension and AlterationsSets out criteria to ensure proposals are of an acceptable design, scale, massing and materials and which take account of the existing property, character of the area, landscape features, amenity space and the residential amenity of neighbours.Also sets out detailed guidance in Annex A relating to the appropriate application of the policy criteria.	SPPS provides a strategic approach to achieving quality residential extensions and alterations. It does not provide the detail of Policy EXT 1 in terms of the individual criteria or the additional guidance provided in its associated Annex. SPPS states that Councils should bring forward local planning policy or guidance for achieving quality in residential developments including residential extensions and alterations.	Policy EXT 1 appears to be working well and there is no evidence to suggest that it needs to be amended. It is recommended that the wording of Policy EXT 1 is brought forward in the LDP Plan Strategy.	No comments received from statutory consultees or public respondents to this policy. Post consultation consideration Bring forward POP recommendation.	 Policy HOU3: Residential Extension and Alterations The policy wording of Policy EXT 1 has been carried forward. Councillor & PMT Comments Further to Dfl comments minor changes made to J&A to clarify that policy applies to all dwelling houses and flats including those in the countryside.

Addendum to PPS 7: Safeguarding the Character of Established Residential Areas	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
Policy LC 1: Protecting: Local Character, Environmental Quality and Residential Amenity (in addition to Policy QD1) Seeks to protect local character, environmental quality and residential amenity in established residential areas in addition to the criteria contained within Policy QD1. Sets out criteria in relation to density, pattern of development as well as specifying space standards for new dwellings and apartments.	SPPS generally accords with Policy LC1, however it does not provide space standards.	Policy LC 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. It is recommended that the wording of Policy LC 1 and related Annex A is brought forward in the LDP Plan Strategy. As some criteria in Policy LC 1 overlap with Policy QD 1 there may be opportunity to consolidate policy wording from the two existing policies in the LDP.	No comments received from statutory consultees or public respondents to this policy. Post consultation consideration Bring forward POP recommendation.	Policy LC1 has now been included within Policy HOU1: Quality in New Residential Development in Settlements – see above
Policy LC 2: The Conversion or Change of Use of Existing Buildings to Flats or Apartments (in addition to QD 1) Sets out 5 criteria that must be met one of which states that a building to be converted or adapted must have a floor area greater that 150 sq. metres. Other criteria seek to ensure each unit is self-contained, not solely to the rear of the proposal and access to the public street is maintained.	SPPS encourages sustainable development by accommodating housing through recycling buildings and encouraging compact urban forms. The detail in Policy LC 2 aligns with SPPS strategic policy to increase housing density without town cramming and other policies to achieve quality residential environments. SPPS is not prescriptive.	Policy LC 2 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. It is recommended that the wording of Policy LC 2 is amended to include an additional criteria requiring adequate waste storage areas that are well designed as an integral part of the proposed development, and brought forward in the LDP Plan Strategy. Alternatively, such a criterion could be included within a general policy in the LDP Plan Strategy so it would apply to new apartments. As some criteria in Policy LC 2 overlaps with Policy QD 1 there may be opportunity to consolidate policy wording from the two existing policies in the LDP Plan Strategy.	Strong support from statutory consultees and public respondents for an additional criterion requiring the provision of waste storage areas that are designed as an integral part of the proposed development when assessing of conversions or change of use proposals to apartments. All statutory consultees and public respondents agreed that this should also apply to all new apartments. NIHE considered adequate waste storage areas as important for safeguarding amenity. Post consultation consideration Bring forward POP recommendation.	Policy HOU2: The Conversion or Change of Use of Existing Buildings to Flats or Apartments Policy wording largely brought forward with amendments. Amended to include criteria requiring provision of refuse storage space and to ensure proposals will not prejudice any existing commercial use in the property. Councillor & PMT Comments No changes further to above consultations.
New Policy HOU4: Protected Town Centre Housing Areas Extant Plans for Ballymena, Carrickfergus and Larne identify existing residential areas within these main towns and the	The SPPS states that Local Development Plans should identify areas within Town Centres where existing residential development will be protected.	Key Issue 10 deals with the protection and promotion of other town centre uses.	Both the public and consultees were in favour of the preferred option. Whilst initially seeking more baseline information to assist appraisal of the option following further discussions with Dfl, they	Policy HOU4: Protected Town Centre Housing Areas Policy states that within designated Protected Town Centre Housing Areas, planning permission will not be granted for any development that

associated policy provisions resist any development that results in a change of use from housing.		The preferred option is to facilitate residential use through the protection of existing housing areas and/or include housing as part of the development mix in opportunity sites. Also to facilitate Class B1 Business Uses on upper floor levels in town centres.	recognised that it is widely accepted that town centre living enhanced vitality, stimulates evening economy and can reduce vandalism. Post consultation consideration Bring forward POP recommendation in regards to the protection of town centre housing areas.	results in a change of use from housing. Councillor Comments No changes further to Councillor consultation.
Policy LC 3: Permeable Paving in New Residential Development Promotes the use of permeable paving within new residential developments to reduce the risk of flooding.	SPPS states that a design concept should be submitted with proposals and it should incorporate sustainable elements such as the use of SuDS where appropriate therefore following the thrust of Policy LC 3.	It is recommended that the wording of Policy LC 3 is brought forward in the LDP Plan Strategy.	NIHE supported the use of SuDS. Post consultation consideration It is recommended that the thrust of Policy LC 3 is brought forward or alternatively incorporated into a wider strategic policy on SuDS.	Policy LC 3 is now superseded by new Policy FRD4 - Sustainable Drainage (SuDS) (see Technical Supplement 12).
Annex A: Space Standards Internal floor space standards for apartments and dwellings.	Detail not provided in the SPPS.	It is recommended that the wording of Annex A is brought forward in the LDP.	The majority of statutory consultees and public respondents thought that the space standards set out in Annex A should be retained and that they should be applied to all new apartments and dwellings. NIHE noted that these standards are already mandatory for all new build social housing and are important for creating well- functioning living environments. Post consultation consideration Bring forward POP recommendation.	Appendix StandardsF:ResidentialSpace SpaceSpace standards have been brought forward in relation to housing developments in Established Residential Areas.Councillor & PMT Comments No changes further to above consultations.
Annex E: Definition of an Established Residential Area Definition and in recognition of the desirability of promoting increased density housing in appropriate locations, it lists 3 exceptions when Policy LC 1 will not apply, this includes: designated city centres, designated large town centres, along key and link transport corridors within cities and large towns and sites adjacent to main public transportation nodes in cities and large towns.	Detail not provided in the SPPS.	It is recommended that the wording of Annex E is brought forward in the LDP.	No comments received from statutory consultees or public respondents to this policy. Post consultation consideration Bring forward POP recommendation.	Appendix E: Definition of an Established Residential Area Definition of an established residential area has been largely brought forward and placed in Appendix E of draft Plan Strategy. However, the exceptions have been amended to only include areas in main towns located adjacent to main public transport nodes or areas within or closely associated with town centres and these are now included within the policy wording of Policy HOU1: Quality in New Residential Developments in Settlements (see above). Reference to cities have been removed due to their absence in the Borough. The exception along key and link transport corridors within large towns has been

removed as in our Borough these are often ATCs or areas of strong character that need to be sensitively developed.

Councillor & PMT Comments No changes further to above consultations.

PPS 12: Housing in Settlements	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
PCP 1: Increased Housing Density without Town Cramming A principle rather than policy, but relates to HS 1: Living Over the Shop (set out below) and reiterates PPS 7. Promotes increased density in housing developments by encouraging compact urban forms and promoting more housing within existing urban areas.	The strategic policy of the SPPS generally accords with PCP 1 and promotes higher density housing developments within city and town centres and other locations that benefit from high accessibility to public transport facilities. There are subtle changes to the text in the SPPS such as the word 'privacy' has been substituted with 'amenity' and 'safeguarding' has replaced 'not significantly eroded'.	Principle PCP 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. However, as this planning principle is not operational policy and has been transposed in the SPPS it does not need to be brought forward in the LDP Plan Strategy.	No comments received from statutory consultees or public respondents to this planning principle. Post consultation consideration As per POP recommendation do not bring forward wording of PCP 1.	The principle of increasing housing density without town cramming is accounted for within our strategic approach to housing and within the thrust of the following policies: -Policy HOU2: The Conversion or Change of Use of Existing Buildings to Flats or Apartments -Policy HOU3: Residential Extension and Alterations -Policy HOU4: Protected Town Centre Housing Areas (see above)
PCP 2: Good Design A principle rather than policy and reiterates PPS 7. Promotes that all new housing development should demonstrate a high quality of design, layout and landscaping.	'Good Design' is a regional strategic policy within the SPPS and is also one of the Core Planning Principles identified, alongside 'Place Making'. SPPS recognises the contribution that good design can have on achieving sustainable development by providing safe and attractive places to live, it also calls for roads infrastructure to be considered in relation to good design. SPPS generally accords with PCP 2 and states that Councils should bring forward local planning policy or guidance for achieving quality in residential development including proposals for residential extensions or alterations.	Principle PCP 2 appears to be working well, however this planning principle is not currently operational policy. It is recommended that a General operational policy will be included in the LDP Plan Strategy promoting good design and urban design criteria developed for key strategic locations taking account of the SPPS Core Planning Principles and other relevant guidance such as Living Places and Creating Places.	No comments received from statutory consultees or public respondents to this planning principle. Post consultation consideration Bring forward POP recommendation.	The principle of good design has been included within Policy GP1: General Policy for all Development (see above) and is embedded in the content of all other policies for assessing housing development within the Plan Strategy.

PCP 3: Sustainable Forms of Development A principle rather than policy and reiterates PPS 7. Promotes the reuse of brownfield land and the recycling of buildings within settlements.	'Sustainable Development' is a Core Planning Principle of the SPPS. SPPS accords with PCP 3, and includes the additional line 'the encouragement of compact town and village forms'. SPPS also replaces the wording 'concentrated in sustainable locations' with 'located in sustainable locations'. The minor text revision does not dilute or substantially add to the policy context.	Principle PCP 3 appears to be working well. However, as this planning principle is not operational policy and has been transposed in the SPPS it does not need to be brought forward in the LDP Plan Strategy. Sustainable forms of development will be addressed through the Plan Strategy and will also feed through to the Local Policies Plan, for example through zoning for development in sustainable locations.	No comments received from statutory consultees or public respondents to this planning principle. Post consultation consideration As per POP recommendation do not bring forward wording of PCP 3 and address sustainable forms of development through appropriate zonings in the Local Policies Plan.	As per POP recommendation the wording of PCP 3 has not been brought forward. Achieving sustainable development is at the core of the Plan Strategy and furthermore sustainable forms of development will be addressed through appropriate zonings in the Local Policies Plan.
PCP 4: Balanced Communities A principle rather than policy, but relates to Policy HS 2 to HS 4 (set out below). Promotes the provision of social housing within larger developments, travellers accommodation where there is an identified need and a range of house types and sizes as a means of achieving balanced communities. It also states that where there is a need for Travellers specific accommodation it should be facilitated at specific sites. Suggests the use of planning agreements may be used to secure a portion of social housing in new developments.	 SPPS addresses the need to provide balanced communities and generally accords with PCP 4. It recognises the requirement to provide social housing where need is identified by NIHE and reiterates the text in PCP 4. SPPS is further strengthened by Core Planning Principle 'Creating and Enhancing Shared Space'. SPPS is silent on planning agreements to secure social housing within new developments. SPPS promotes guidance contained within Living Places. 	Principle PCP 4 appears to be working well, however this planning principle is not currently operational policy. The proposed approach to the provision of social housing in the LDP is dealt with under Policy HS 2 below, and proposed operational policy dealing with travellers accommodation and the mix of house types and sizes in housing developments is dealt with under Policy HS 3 and HS 4 respectively (see below).	No comments received from statutory consultees or public respondents to this planning principle. Post consultation consideration See Policies HS 3 and HS 4 below.	The principle of balanced communities is accounted for within our overall strategic approach and will be delivered by the following policies: -Policy HOU5: Affordable Housing in Settlements -Policy HOU16: Affordable Housing in the Countryside -Policy HOU8: Traveller Accommodation -Policy HOU6: Housing Mix (Unit Types and Sizes) -Policy HOU7: Adaptable and Accessible Homes (see below)
Policy HS 1: Living over the Shop Promotes the sustainable reuse of existing buildings and promotes 'Living over the Shop' to provide vitality and viability to town centres. Proposals are subject to the provision of a suitable living environment, adequate refuse storage space and acceptable design and materials. A flexible approach to parking may be acceptable in certain circumstances.	SPPS states that residential use above shops and other businesses should be facilitated where appropriate.	Policy HS 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. It is recommended that the wording of Policy HS 1 is brought forward in the LDP Plan Strategy.	NIHE suggested an amendment to this policy to incorporate reductions in parking standards for these units. They see good quality public realm and accessible green space as making these types of unit more appealing for future residents. HED suggested that preference might be given to utilising historic properties, including industrial heritage, for mixed use accommodation over new build, to promote attractive and distinct places to live and invest. Post consultation consideration We have proposed to bring forward the wording of Policy AMP 7 and this allows for	Policy HS 1 has been included within Policy HOU2: The Conversion or Change of Use of Existing Buildings to Flats or Apartments (see above)

			reduced parking standard in certain circumstances. Bring forward POP recommendation.	
Policy HS 2: Social Housing Outlines that social housing should be provided as an integral element of new residential developments. This should be deliver through the provision of a mix of house types and size to promote choice and assist in meeting community needs in locations where a need has been identified by NIHE. Relates to principle PCP 4 above.	SPPS recognises the requirement to provide social/affordable housing where need is identified by NIHE. SPPS states the LDP process will be the primary vehicle to facilitate any identified social housing need by zoning land or through key site requirements, this however does not preclude other sites coming forward through the development management process.	Key Issue 14 deals with the provision of social/affordable housing. The preferred option is to zone sites for social/affordable housing in the Local Policies Plan and indicate through key site requirements where a proportion of a housing zoning should be provided as social housing, where a need has been identified. This option also set out strategic policy requiring that every 10th unit within new housing developments, in settlements where a need has been identified, shall be a social housing unit. It is recommended that this amended policy approach is brought forward in the LDP Plan Strategy.	Comments received from statutory consultees and public respondents are set out under Key Issue 14. Post consultation consideration We will continue to liaise and discuss the policy wording and potential mechanisms for delivering affordable housing (social rented and intermediate) with the relevant partners as the plan making process progresses, taking account of the NIHE HNA.	 Policy HOU5: Affordable Housing in Settlements New policy wording developed to ensure an approach that is tailored to meet the needs of our Borough. Policy states that where there is a need proposals for housing of 10 dwellings or more, or on a site of 0.2ha or more will only be permitted subject to meeting the following quotas: Main and small towns: 20% Affordable Housing Villages and small settlements: 10% Affordable Housing Villages and small settlements: 10% Affordable Housing Proposals are also required to meet Policy GP1: General Policy for all Development and accord with other provisions of the LDP. The J&A also allows, where necessary, for a higher proportion of affordable housing to be sought at LPP stage through key site requirements attached to specific housing zonings. Councillor & PMT comments No further changes to the policy further to PMT feedback. NIHE strongly support the policy as it will help meet housing needs in the Borough and to promote mixed tenure development to ensure balanced communities. Dfl recognise policy has been developed in consultation with NIHE.
Policy HS 3: Travellers Accommodation (as amended) Provides criteria for the assessment of Travellers Accommodation (a grouped housing scheme, a serviced site or a transit site) identified by a NIHE local housing needs assessment.	Traveller Accommodation is referenced in the implementation section of the SPPS. It states that where a need is identified for a transit or a serviced site which cannot be readily met within an existing settlement proposals will have to meet the policy requirements in respect of rural planning policy for social and	Policy HS 3 (as amended) appears to be working well and there is no evidence to suggest that it needs to be substantially amended. NIHE have indicated that there is no current need for Travellers Accommodation in the Borough.	NIHE requested that Policy HS 3 is adopted without amendment. While they acknowledge that at this time there is no need for Travellers accommodation in the Borough, due to the transient nature of this need group it is not always possible to pre- determine where need may arise. As a	Policy HOU8: Traveller Accommodation Policy HOU8 provides for the assessment of future proposals for the provision of suitable facilities if a need is identified.

The criteria relates to landscaping, site context, environmental amenity and the provision of workspace, play space and visitor car parking. This policy requires a sequential approach in relation to the location of such accommodation. In addition, a single family traveller transit or serviced site will be approved in exceptional circumstances in the countryside, without a requirement to demonstrate a need.	affordable housing. The criteria listed in HS 3 are repeated in the SPPS. SPPS does not set out a sequential approach for locating such accommodation but rather states that those proposed in rural locations should be designed to integrate sympathetically with their surroundings. SPPS does not refer to single family traveller transit or serviced sites in the countryside.	It is recommended that the wording of Policy HS 3 (as amended) is brought forward in the LDP Plan Strategy and amended to remove the exception for permission in the countryside, without a requirement to demonstrate need, for single family traveller transit or serviced sites to reflect the SPPS.	Section 75 group it is important that the plan adequately meets the needs of Travellers. Post consultation consideration Discuss wording of SPPS with Dfl before bringing forward POP recommendation.	The wording of policy H3 (as amended) has been largely brought forward with some amendments to criteria and includes the need to meet Policy GP1: General Policy for all Development. The exception allowing a single family Traveller transit or serviced site in the countryside has been amended and a need should be demonstrated through the NIHE Housing Needs Assessment. Councillor & PMT comments No changes to policy further to above consultations. NIHE support the policy, minor changes made to the J&A further to their comments.	
Policy HS 4: House Types and Size This policy compliments PPS 7 and requires that new residential developments over 25 units/on sites 1 hectare or above should deliver of a mix of house types and sizes to promote balanced communities and create variety and interest. Smaller schemes will be considered on their individual merits.	SPPS includes as a Core Planning Principle and as a strategic policy objective the need to provide a variety of house types, sizes and tenures as a means of providing a good quality housing offering and as a way of achieving balanced communities. SPPS does not specify a threshold.	Policy HS 4 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. NIHE would like new policy to ensure a mix of tenures in all developments tailored to urban and rural locations. This has been dealt with in Key Issue 14 (see Policy HS 2 above) in so far as it relates to social/affordable housing. NIHE also recommended that all dwelling units should be designed to Lifetime Home standards. Bringing forward policy in the LDP for all housing units to be to Lifetime Home standards was considered to be too onerous within current Building Control Regulations. As a compromise, Key Issue 15, deals with the delivery of housing to meet the needs of people with mobility difficulties. The preferred option is to bring forward a new policy that all ground a partments in blocks of 2 storey or above should be wheelchair accessible units.	NIHE welcome the retention of Policy HS 4. They again advocate that Council include Lifetime Home standards for all housing in the LDP. They advise that, currently, all social housing is developed to Lifetime Homes Standard and achieves Building Control approval. Any additional cost of delivering Lifetime Homes standard housing is minimal, and this is often a Plan requirement for all new housing in GB. Lifetime Homes Standard helps to provide housing that is suitable to meet the changing needs of the population throughout their life, particularly the elderly and will minimise potential for costly and disruptive adaptations. Finally they highlight that the inclusion of Lifetime Homes would contribute to meeting the Community Plan outcome "Our older people are active, respected and supported in their community". Post consultation consideration Further to previous consideration in regard to Lifetime Homes we will work closely with the relevant agencies including NIHE and Council's Building Control Department to investigate further how the LDP can promote Lifetime Homes. We may bring forward amended policy if	 Policy HOU6: Housing Mix (Unit Types and Sizes) 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 (refer to Table 3.1). This emphasises the need for 'smaller size, new build houses' within the Borough (Mid and East Antrim Housing Market Analysis Update, NIHE, June 2018). Policy HOU6 requires a mix of house types and sizes and highlights that provision should be made for smaller homes. Policy wording of HS 4 has been brought forward and amended to ensure proposals also meet Policy GP1: General Policy for all Development and accord with other provisions of the LDP. Councillor Workshop & PMT comments No changes to policy further to PMT feedback. NIHE support the policy, minor changes made to the J&A 	
68					

of Policy HS 4 regarding a mix of house types and sizes in new residential developments is brought forward in the LDP Plan Strategy and expanded as per the preferred option in Key Issue 15.		further to their comments. New Policy HOU7: Adaptable and Accessible Homes Approach set out in Key Issue 15 considered to be too onerous. New policy wording developed in response to NIHE and Building control consultation. Policy sets out 5 criteria new dwellings must meet with the aim of making new homes more adaptable and accessible. Councillor Workshop & PMT comments No changes to policy further to above consultations. NIHE strongly supports the policy. NIHE would have liked the policy to have gone a step further to specifically refer to houses constructed to wheelchair standards however it was considered that changes to Building Control regulations are required and the detail required went beyond planning's remit.
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PPS 21: Sustainable Development in the Countryside	SPPS	POP Recommendation/Comment	POP Responses and Post Consultation Consideration	Final Wording for Draft Plan Strategy
Policy CTY 1: Development in the Countryside A directional policy that signposts the types of developments which are considered acceptable in principle in the countryside, and references the policies (in PPS 21 and elsewhere) that are relevant. States that all proposals must be designed and sited to integrate sympathetically into the landscape and that they should meet other planning and environmental considerations including those for drainage, access and	SPPS does not have an overarching policy like Policy CTY 1 but rather has individual regional strategic policies. Aim of the SPPS with regard to the countryside is to manage development in a manner which strikes a balance between protection of the environment from inappropriate development, whist supporting and sustaining rural communities. SPPS omits any reference to Dispersed Rural Communities (DRC's) whereas they are referred to specifically in Policy CTY 1. SPPS policy in relation to development in the Countryside is currently being reviewed.	Policy CTY 1 appears to be working well, however it should be amended to reflect the SPPS removal of reference to Dispersed Rural Communities (CTY 2). It is recommended that a directional policy, in line with the thrust of Policy CTY 1, save for reference to DRC's, is brought forward in the LDP Plan Strategy.	Dfl advise that they are currently undertaking a review of the SPPS, focusing on Development in the Countryside. The review was due for completion by the end of 2018. Post consultation consideration Bring forward POP recommendation and take account of SPPS review when available.	CS1: Sustainable Development in the Countryside A directional policy similar to CTY1, brought forward with amended wording to signpost to all relevant draft Plan Strategy countryside policies. In addition to the requirements of individual policies all proposals must satisfy Policy GP1: General Policy for all Development and accord with other provisions of the LDP.
		69		

road safety.				
Advises that if an area is designated as a Special Countryside Area (SCA) then no development will be permitted unless it complies with the specific policy provisions of the relevant LDP.				
 Policy CTY 2: Development in Dispersed Rural Communities Sets out circumstances where development will be permitted in designated DRC's. Allows for a small cluster or "clachan" style development of up to 6 houses at a focal point in a DRC. This is limited to one cluster per focal point. Appropriate economic, tourism, social or community facilities may also be accommodated in a DRC under CTY 2. Design should be high quality and sympathetic to the rural area. 	There is no provision for DRC's in the SPPS. Note: Mid & East Antrim currently does not have any designated Dispersed Rural Communities.	In order to reflect the SPPS, it is recommended, that Policy CTY 2, regarding development in Dispersed Rural Communities is not brought forward in the LDP Plan Strategy.	No comments received from statutory consultees or public respondents to this policy. Post consultation consideration As per POP recommendation do not bring forward wording of Policy CTY 2.	Policy CTY 2 has not been brought forward in the draft Plan Strategy as the Borough does not have any existing designated Dispersed Rural Communities nor are any proposed. Councillor & PMT comments No changes further to above consultations.
Policy CTY 2a: New Dwellings in Existing Clusters Provides opportunities to gain approval for a dwelling in an existing rural cluster provided the cluster is outside of a farm and consists of 4 or more buildings, 3 of which must be dwellings. The cluster must appear as a visual entity in the landscape and must be associated with a focal point e.g. community building or is located at a cross roads. The site must provide adequate enclosure and be bounded on at least 2 sides with other development in the cluster. The development of the site should not significantly alter the character of the site or countryside and should not impact on residential amenity.	SPPS adopts a policy approach based on clustering, consolidating and grouping new development, particularly new residential development, with existing established buildings. SPPS policy for new dwellings in existing clusters is less detailed than Policy CTY2a in the criteria to be adhered to, however, the main provisions are detailed and no new or additional criteria have been added. SPPS does not detail the types/number of buildings deemed to be a cluster, does not define what constitutes a focal point nor does it state that the site should provide a suitable degree of enclosure or avoid adversely impacting on residential amenity.	Policy CTY2a appears to be working well and there is no evidence to suggest that it needs to be substantially amended. However, unlike the other policies in PPS 21 it lacks any justification and amplification. It is recommended that the wording of Policy CTY 2a is brought forward in the LDP Plan Strategy. In addition it is recommended that amplification is provided to: • state buildings or focal points within settlements cannot be used to support proposals; • explain that the list of focal points is not exhaustive; • explain that a suitable cluster depends on physical proximity as well as visual linkages; and provide direction to guidance in Building on Tradition.	No comments received from statutory consultees or public respondents to this policy. Post consultation consideration Bring forward POP recommendation.	Policy HOU12: New Dwelling in Existing Clusters Policy has largely been carried forward with criteria amended and additional criteria to prevent coalescence and ribbon development. Proposals must meet Policy GP1: General Policy for all Development and accord with other provisions of the LDP. Councillor & PMT comments No changes further to above consultations.
Policy CTY 3: Replacement Dwellings Provides policy for the provision of replacement dwellings where dwelling	SPPS is less detailed than Policy CTY 3 however it covers some of the primary themes.	Policy CTY 3 appears to be working well and there is no evidence to suggest that it needs to be	The majority of statutory consultees and public respondents were supportive of the submission of verifiable evidence, as to the	Policy HOU9: Replacement Dwellings Wording of policy CTY 3 has largely been brought forward with some

will not be eligible for replacement.brSets out when a non-residential building can be replaced with a dwelling and deals with replacement of fire damaged dwellings.ItSeeks to help retain non-listed vernacular dwellings and promote their sympathetic renovation and continued use rather than replacement. However, iexceptions are listed detailing when sets out 5 criteria all replacement proposals must meet including siting, visual impact high quality designIt	single dwelling where their replacement brings about environmental benefits. It is also silent on the replacement of fire damaged buildings nor does it include specific criteria for the replacement of non- listed vernacular dwellings, nor criteria on design, services or safe access for all replacement cases. SPPS refers to unlisted vernacular buildings in Para 6.24, but not specifically under the section Development in the Countryside. It states that applications that directly or indirectly affect such buildings will be judged on the scale of any harm or loss and the significance of the heritage asset. SPPS approach is to promote the re-use of previously used buildings.	 safeguard rural assets. Taking this into account it would appear prudent to, as a minimum, retain the wording of CTY 3 in regard to non-listed vernacular dwellings. It is recommended that the wording of Policy CTY 3 is brought forward in the LDP Plan Strategy and amended to reflect the following: A requirement to submit verifiable evidence as to the extent of the original dwelling; Remove reference to fire damaged dwellings as per the SPPS; Relocate and include the criteria for the replacement of non-listed vernacular dwellings within an amended PPS 6 BH 15 built heritage policy. 	heritage led approach to the reuse and conservation of historic buildings and signposted their published guidance 'Historic Buildings of Local Importance.' NIHE were unsupportive as they felt that an unduly restrictive policy may promote greenfield development. The majority of statutory consultees and public respondents agreed that reference to fire damaged dwellings should be removed as per the SPPS. There was also support for relocating and including the criteria for the replacement of non-listed vernacular dwellings within an amended PPS 6 BH 15 built heritage policy. Post consultation consideration In regard to NIHE's comments, it is considered that a more restrictive replacement policy should not necessarily lead to increased greenfield development in the countryside. Further discuss policy wording for non-listed vernacular dwellings with Dfl and HED before bringing forward POP recommendation.	policy and also Policy HE8 Non-listed Locally Important Building or Vernacular Building. Requirement to provide verifiable evidence is detailed in the J&A. Proposals must also met Policy GP1; General Policy for all Development and accord with other provisions of the LDP. Councillor & PMT comments No changes further to above consultations. Dfl welcome policy being carried forward.
Reuse of Existing BuildingsreadProvides for the conversion of 'a suitable building' to a variety of uses, including use as a single dwelling. The amplification section states this can include school houses, churches and older traditional barns and outbuildings.The amplification section states this can include school houses, churches and older traditional barns and outbuildings.Proposals have to be of high design quality and meet 7 criteria, including be of permanent construction, maintain or enhance the building, should not affect the amenities of nearby residents, proposals for non-residential use should be appropriate to a countryside location, all proposals should provide necessary services and safe access. In addition,	SPPS separates the policy for conversion and reuse into one for 'residential use' and another for when the end use will be 'non- residential'. The policy text in SPPS has been revised to clarify the intent of Policy CTY 4 in respect of the historical or architectural merit of a building to be converted/re-used. SPPS therefore refers to 'a locally important building' rather than 'a suitable building' as stated in Policy CTY 4. Under the policy for the conversion of an existing building to 'residential use', SPPS states that, in cases where an original former dwelling is retained as an ancillary building to the new dwelling, it will not be eligible for conversion back to a dwelling. SPPS does not provide detailed criteria save	When Policy CTY 4 terminology, 'a suitable building' was applied, many inappropriate buildings came forward for consideration. The PAC have found that the wording in the SPPS 'a locally important building' takes precedence over the term 'a suitable building'. In relation to Economic Development, Policy CTY 4 appears to be working well and there is no evidence to suggest that it needs to be amended. It is recommended that the wording of Policy CTY 4 is brought forward in the LDP Plan Strategy and amended to take account of the SPPS and therefore separated into	 Two thirds of statutory consultees and public respondents agreed the policy wording should be amended to reflect SPPS. One public respondent considered the SPPS change in wording would provide little clarification on the policy as both terms are equally ambiguous. HED and some public respondents advocate Council identifying buildings of local importance in their area. Broad support for Council's suggested amendments to CTY 4 to ensure protection of sustainable economic development within the countryside. Post consultation consideration Discuss with Dfl and HED before bringing forward POP recommendation. 	Policy CTY 4 has been accounted for within Historic Environment Policy HE8 Non-Listed Locally Important Building or Vernacular Buildings.

existing building. States that buildings of a temporary construction, including agricultural buildings are not eligible for conversion or re-use. Sets out criteria for the conversion of a traditional non-residential building to more than one dwelling and states that proposals for the conversion of listed buildings will be assessed against PPS 6.	for repeating Policy CTY 4 and stating that conversions to a 'non-residential use' should be appropriate in nature and scale to its countryside location. SPPS (para 6.87) includes the re-use of rural buildings as one of the proposals which will offer the greatest scope for economic development in the countryside.	policies for residential and non- residential end uses, to refer to 'a locally important building' and to state that a former dwelling previously replaced and retained as an ancillary building to the new replacement dwelling will not be eligible for conversion back into residential use. In addition this amended policy should signpost proposals for the conversion and reuse of non-listed vernacular buildings to an amended PPS 6 BH 15 built heritage policy.		
 Policy CTY 5: Social and Affordable Housing Current planning policy normally resists groups of dwellings in the countryside but this policy is an exception, allowing registered Housing Associations approval for up to 14 dwellings, subject to a specific social/affordable housing need being demonstrated by NIHE which cannot be met within an existing settlement. Proposals have to be adjacent or near to a small settlement and a sequential test will be applied in terms of location. Proposals must be sited and designed to integrate with their surroundings and meet other planning criteria and policy requirements. Criteria relating to proposals in Dispersed Rural Communities is also provided and it is stated that only one group will be permitted in close proximity to any particular rural settlement. 	 SPPS is not as prescriptive as Policy CTY 5 and refers to development of a small group where the number will depend upon the identified need and the ability to integrate with its surroundings, rather than 'no more than 14 dwellings'. Unlike Policy CTY 5 it does not state that applications must be made by registered Housing Associations, nor does it set out a sequential test in terms of locating an acceptable site. SPPS also does not limit such proposals to only one group in close proximity to any particular rural settlement. 	Policy CTY 5 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. Such proposals have been limited in this Borough to date and it is anticipated that the new LDP and subsequent reviews should identify sufficient sites within settlements to meet NIHE need. It is recommended that the wording of Policy CTY 5 is brought forward in the LDP, save for reference to Dispersed Rural Communities.	Statutory consultees agreed that applications should only be made by a registered housing association and that dwellings should be limited to 14. NIHE believed this will ensure that properties are allocated to those in housing need and that the limit of 14 dwellings will protect the character of the rural settlement. NIHE also considered only one such grouping should be allowed in close proximity to any given settlement. Public respondents were more divided in relation to CTY 5. One respondent considered that over prescriptive policies would hinder the ability to meet future challenges. Another felt that private landowners should be permitted to make applications for social housing on a voluntary basis, as this could help release land for social housing. Post consultation consideration Further discuss with Dfl and NIHE before bringing forward POP recommendation.	 Policy HOU16: Affordable Housing in the Countryside Policy wording has largely been carried forward. Amendment to the policy which allows for no more than 14 dwellings adjacent to a village and no more than 8 adjacent to a small settlement in order to ensure the character of these settlements is protected. Reference to Dispersed Rural Communities has been removed. Councillor & PMT comments No changes further to above consultations. NIHE are supportive of the policy.
Policy CTY 6: Personal and Domestic Circumstances This policy is centred on permitting dwellings in the countryside for those who may have special personal or domestic circumstances. Includes criteria which requires the	SPPS is less prescriptive than Policy CTY 6. Whilst it requires the applicant to demonstrate compelling and site specific reason for a dwelling as well as demonstrating there are no alternative solutions, it does not go on to refer to the level/type of detail required.	Policy CTY 6 appears to be working well and there is no evidence to suggest that it needs to be amended. It is recommended that the wording of Policy CTY 6 is brought forward in the LDP.	No comments received from statutory consultees or public respondents to this policy. Post consultation consideration Bring forward POP recommendation.	Policy HOU14: Personal and Domestic Circumstances Policy wording has largely been brought forward. Wording amendment to refer to the long term needs of an individual or family rather than applicant. Includes the need to meet Policy GP1: General Policy for all Development and accord

applicant to demonstrate compelling and site specific reasons as to why they				with other provisions of the LDP.
need a dwelling in a particular rural location.				Councillor & PMT comments No changes further to above consultations.
 Policy CTY 7: Dwellings For Non- Agricultural Business Enterprises This policy provides opportunity for an established non-agricultural business in the countryside to secure permission for a dwelling in circumstances where one of the firm's employees must live on site. Site specific need for a dwelling must be demonstrated and if the business has been operating successfully without a dwelling, the need for accommodation must be justified. The dwelling should be located beside or within the boundaries of the business and integrate. It will also be subject to an occupancy condition. 	SPPS is similar but less detailed than Policy CTY 7.SPPS refers to 'an employee of the business' rather than 'one of the firm's employees'.SPPS does not include criteria relating to siting or integration and does not refer to approvals being subject to an occupancy condition.	Policy CTY 7 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. It is recommended that the wording of Policy CTY 7 is brought forward in the LDP, with a slight amendment to reflect the SPPS to refer to 'an employee of the business' rather than 'one of the firm's employees'.	No comments received from statutory consultees or public respondents to this policy. Post consultation consideration Bring forward POP recommendation.	Policy HOU11: Dwelling for Non- Agricultural Business Enterprise Policy wording largely brought forward. Amended to reflect SPPS wording and criteria added to ensure no other development opportunities are available under other policies and that there is no other reasonable alternative solution. Proposals must also meet Policy GP1: General Policy for all Development and accord with other provisions of the LDP. Councillor & PMT comments No changes further to above consultations.
 Policy CTY 8: Ribbon Development This policy resists ribbon development in the countryside but allows for the development of a small gap site, sufficient only to accommodate up to a maximum of 2 houses within a built up frontage and provided this respects existing development patterns. Built up frontages are defined as a line of 3 or more buildings along a road frontage (including footpaths or private lanes) without accompanying development to the rear. In relation to economic development, provision is also made for infilling a small gap with an appropriate economic development proposal, including light industry. Such a proposal must meet 4 criteria -: be in keeping with the scale of adjoining development, be of a high design standard, not impact on the amenity of neighbours, and meet other planning and environmental requirements. 	 SPPS is similar but less detailed than Policy CTY 7. SPPS states that councils may bring forward policies in respect of the development of a small gap site within an otherwise substantial and continuously built up frontage. It does not, define the size of an acceptable gap, nor provide a definition of a substantial and continuously built up frontage unlike Policy CTY 8. SPPS does not have provision for the infilling of a gap site with an economic development proposal. 	Concerns have been raised about the inconsistency in the interpretation of Policy CTY 8, particularly in regard to the wording of 'a line of 3 or more buildings without accompanying development to the rear' and the types of buildings that can be counted as part of the built up frontage. For example, domestic garages may not be considered appropriate. A stricter policy for the infilling of a small gap may help reduce the potential number of new single dwellings in the open countryside. It is recommended that the wording of Policy CTY 8 is brought forward in the LDP Plan Strategy to allow the infilling of a gap site with an appropriate economic development proposal. It is also recommended that the remaining wording of Policy CTY 8 is brought forward in the LDP Plan	The majority of respondents agreed that only substantial buildings should be counted as part of a built up frontage and that the policy should include a visual test. NIHE and NIEA supported the stronger policy test in order to protect the character and visual amenity of the countryside. One public respondent requested clarification on the term 'substantial buildings' in order to prevent uncertainty. HED had concerns regarding criteria to use 'only substantial buildingsas part of a visual test' for development integration in the countryside. Post consultation consideration Bring forward POP recommendation.	Policy HOU13: Ribbon/Infill Development New policy wording developed. Permission refused for a building that creates ribbon development. Provision for development of a gap site sufficient only to accommodate 1 dwelling. Definition of a substantial and built up frontage includes reference to 'substantial buildings' and 'visually linked when viewed from the road'. Proposals must also meet Policy GP1: General Policy for all Development and accord with other provisions of the LDP. Allowance for appropriate economic development has been removed. Councillor & PMT comments Further to discussion at the Councillor workshop regarding the implications of the policy continuing to allow development of a gap sufficient to accommodate up to 2 dwellings to reduce the allowance from 2 dwellings to

		 clarify that this is a visual test; clarify that buildings within settlements cannot be used to support proposals for gaps sites in the countryside. 		approach as seeking to support our spatial strategy. NIHE supportive of the policy.
Policy CTY 9: Residential Caravans and Mobile Homes Sets out two circumstances when a temporary residential caravan or mobile home may be acceptable in the countryside: when it is for provision of temporary accommodation pending development of a permanent dwelling or there are compelling and site specific reasons related to personal or domestic circumstances. Permissions are normally subject to a 3 year time limit and the same planning and environmental considerations as a permanent dwelling. Siting and integration policy also have to be met.	SPPS uses similar wording to Policy CTY 9 and sets out the same two circumstances when a temporary residential caravan or mobile home may be acceptable in the countryside. SPPS does not specify that permissions will be subject to a 3-year time limit nor does it include siting, integration, planning or environmental criteria.	Policy CTY 9 appears to be working well and there is no evidence to suggest that it need to be amended. It is recommended that the wording of Policy CTY 9 is brought forward in the LDP Plan Strategy.	No comments received from statutory consultees or public respondents to this policy. Post consultation consideration Bring forward POP recommendation.	PolicyHOU15:Residential Caravans and Mobile HomesExisting policy wording has been brought forward.Councillor & PMT comments NoNochangesfurthertoabove consultations.
Policy CTY 10: Dwellings on Farms This policy was introduced in recognition of changing farming practices and to help support rural communities. It was considered that there was a continuing need for new dwellings on farms to accommodate those engaged in the farm business and other rural dwellers. To gain permission for a dwelling on a farm, 3 criteria must be met: (i) the farm business must be currently active and established for at least 6 years, (ii) no dwellings or development opportunities should have been sold off from the holding in the previous 10 years and (iii) the new building should visually link/cluster with a group of buildings on the farm.	The SPPS reflects the thrust of Policy CTY 10, and restates the 3 main criteria to be met. The requirement to visually link or site a proposed dwelling to cluster with an existing group of buildings on the farm is restated, however the SPPS does not give the option of siting a dwelling at an alternative site away from the farm buildings. SPPS clarifies the original policy intent of Policy CTY 10 by stating, that in addition to the requirement to cluster or visually link, proposals for dwelling houses must also comply with LDP policies in respect of integration and rural character. SPPS is silent on the assessment of a dwelling for those involved in keeping horses for commercial purposes. Finally, following the repeal of Article 3 of the European Council Regulations No. 74/2009,	Under Policy CTY 10 it is considered that the standard of evidence to demonstrate an active and established farm seems to be low. It is recommend that the wording of Policy CTY 10 is brought forward in the LDP Plan Strategy, updated to refer to the definition of agricultural activity set out in SPPS and amended to: state exactly what information is required in order to demonstrate what qualifies as an active and established farm e.g. make clear hobby farming will not qualify.	In the POP the following question was also posed 'Do you consider that a stricter integration test should be applied to those exceptional sites located elsewhere on a farm?' The majority of statutory consultees and public respondents agreed that a stricter integration test should be applied to those exceptional sites located elsewhere on a farm. Statutory consultees considered this was important to protect the character and visual amenity of the countryside and to prevent the widespread cumulative development within sensitive landscapes (e.g. AONB). NIEA advised caution in this policy approach to ensure that additional pressures are not placed on surrounding woodlands. Public respondents who did not support stricter integration stated the following:	 Policy HOU10: Dwelling on a Farm Business Policy title amended to refer to 'Farm Business' rather than 'Farms', to reiterate the level of farming required to meet the policy. The thrust of the existing policy wording has largely been brought forward but amended to clarify the farm business should currently be active and also have been active and established over the last 6 years. The latter is also a text amendment changing from 'at least' to 'last' 6 years. The J&A of the new policy sets out clarification regarding what constitutes a farm business and the types of evidence that will be required

Provision is also set out for siting elsewhere on the farm in 2 cases, either (i) for health and safety reasons or (ii) if there are verifiable plans to expand the farm business at the existing building group. Proposals must also meet the requirements of CTY 13 regarding integration and design, CTY 14 regarding rural character and CTY 16 regarding sewerage disposal. A dwelling under this policy will only be acceptable once every 10 years. This policy is also used to assess proposals for a dwelling by those involved in keeping horses for commercial purposes.	the definition of agricultural activity for the purposes of the SPPS has been updated to that set out in Article 4 of European Council Regulations (EC) 1307/2013.		 a stricter integration test should be unnecessary if all other integration and design requirements have been met; stricter integration would be unjustifiable in cases where the development of difficult terrain would result in considerable additional expense. Post consultation consideration Bring forward POP recommendation and take account of all comments in developing policy for exceptional sites elsewhere on the farm. 	to demonstrate this. Proposals must also meet Policy GP1: General Policy for all Development and accord with other provisions of the LDP. Councillor & PMT comments No changes further to above consultations.
 Policy CTY 13: Integration and Design of Buildings in the Countryside This policy is applied to all development in the countryside and seeks to ensure new buildings in the countryside are visually integrated and are of appropriate design. Sets out 7 circumstances when a new building will be unacceptable, including when it is prominent, lacks natural boundaries, relies on new landscaping, ancillary works do not integrate, the design is inappropriate, fails to blend with natural or built backdrops and in the case of a dwelling on a farm is not visually linked or clustered with existing farm buildings. 	SPPS is less detailed than Policy CTY 13 and states that all development in the countryside must integrate into its setting, respect rural character and be appropriately designed.	Policy CTY 13 appears to be working well. It is recommended that the wording of Policy CTY 13 is brought forward in the LDP Plan Strategy but amended to set out when a building will be acceptable rather than when it will be unacceptable. It is also recommended that proposals within the AONB are signposted to the additional criteria in the bespoke policy for the AONB.	No comments received from statutory consultees or public respondents to this policy. Post consultation consideration Bring forward POP recommendation.	Policies CTY 13, CTY 14 and CTY 15 have been incorporated within section (f) of Policy GP1: General Policy for all Development; criteria relating to development within the countryside (see above).
Policy CTY 14: Rural Character Seeks to ensure all new buildings in the countryside do not result in a detrimental change to, or further erode the rural character of an area. Sets out 5 circumstances when a new building will be unacceptable, including when it is unduly prominent, results in suburban style build-up, does not respect traditional settlement patterns,	SPPS is less detailed than Policy CTY 14 and states that all development in the countryside must integrate into its setting, respect rural character and be appropriately designed.	Policy CTY 14 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. It is recommended that the wording of Policy CTY 14 is brought forward in the LDP Plan Strategy but amended to set out when a building will be acceptable rather than when it will be unacceptable.	No comments received from statutory consultees or public respondents to this policy. Post consultation consideration Bring forward POP recommendation.	

creates or adds to ribboning, or ancillary works would damage rural character.		It is also recommended that proposals within the AONB are signposted to the additional criteria in the bespoke policy for the AONB.	
Policy CTY 15: The Setting of Settlements Recognises the importance of landscapes around settlements and how they have a role in maintaining the distinction between town and country. Development that mars the distinction between a settlement and the surrounding countryside or that results in urban sprawl will be refused.	SPPS uses similar wording to Policy CTY 15 and states that development in the countryside must not mar the distinction between a settlement and the surrounding countryside, or result in urban sprawl.	Policy CTY 15 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. It is recommended that the wording of Policy CTY 15 is brought forward in the LDP and amended to state that buildings within settlements cannot be used to justify development in the countryside.	No comments received from statutory consultees or public respondents to this policy. Post consultation consideration Bring forward POP recommendation.

NewStrategicHousingAllocationThe strategy of the Ballymena, Carrickfergus and Larne Area Plans was primarily to focus growth in the main towns whilst providing the lowerlowertiersettlements opportunitiesopportunities for growth in line with their role in the hierarchy. The function of lower tier settlements was to sustain the rural areas due to the limited opportunities afforded by greenbelts and rural policy.The above plans pre-dated the publication of the RDS 2025 and as such the plan preparation process did not include the allocation of a regionally derived housing need figure (District HGI) across the plan area.The distribution of housing growth in settlements within BMAP was carried out in accordance with the BMA Housing Strategy. Housing land was allocated to Carrickfergus, Greenisland and Whitehead on a sequential basis in the context of the wider Belfast Metropolitan Area.	The SPPS sets out 8 key elements that should inform housing allocations in Local Development Plans: - RDS Housing Growth Indicators (HGIs) Use of the RDS Hosing Evaluation Framework - Allowance of existing housing commitments - Urban Capacity Studies - Allowance for Windfall Housing - Application of a sequential approach and identification of suitable sites for settlements of over 5,000 population - Housing Needs Assessment/ Housing Market Analysis - Transports Assessments	POP Key Issue 4 Preferred Option was to allocate housing based on the proportion of households living in main towns and small towns at the time of the 2011 Census and increase the percentage of housing growth to villages and small settlements at the expense of the open countryside. This Key Issue addressed housing allocation between the tiers only: Main towns: 58.5% Small towns: 14.9% Villages: 6.6% Small Settlements: 1.8% Countryside: 18.2%	Overall there was general support for the Preferred Option however a variety of responses were received including concern that it is counter to the RDS focus to grow hubs and the allocation to the rural area should be reduced. Some respondents also argued that the housing growth figure (HGI) should be amended Dfl felt that the Preferred Option could reinforce the trend of disproportionate growth in the lower tiers settlements and fail to strengthen the population in the hubs. Post consultation consideration Reassess the Preferred Option and discuss further with Dfl before bringing forward.	 SGS3: Strategic Allocation of Housing to Settlements In response to comments received in relation to the Preferred Option the proposed approach has been revised. The allocation of housing to top tier settlements has been increased and the allocation to the countryside has been reduced to prevent disproportionate growth to the lower tiers: Main towns: 62% Small towns: 15% Villages: 8.5% Small Settlements: 2.5% Countryside 12% The Strategic Housing Allocation also allocates housing between settlements within the top three tiers (main and small towns and villages). A composite allocation is provided for the small settlement tier and the Countryside. Councillor & PMT Comment Consultees contributed towards the development of the Housing Allocation Strategy.
New Protection of Zoned Housing Land The existing area plans zone land for housing with the aim of providing certainty and ensuring that housing needs will be meet. The Larne Area Plan states that other uses ancillary and compatible with the predominant use category may also be acceptable in these zones.	The SPPS states that the policy approach to housing must be to facilitate an adequate and available supply of housing to meet the needs of everyone.	Not discussed at POP stage	This policy was not presented at the POP stage of the LDP process	 SGS4: Protection of Zoned Housing Land Development of non-residential uses on land zoned for housing in settlements will only be permitted where it is ancillary or integral to a major housing development or where there is community need. Councillor & PMT Comments No further changes further to above consultations. NIHE generally supportive.

New Management of Housing Supply

The existing area plans zoned land for housing in the three main towns. In addition the Ballymena Area Plan identified land suitable for housing within 5 of its villages.

Carrickfergus Area Plan recognises development may have to be phased in line with the provision of infrastructure and that permission will not be granted for proposals where infrastructure cannot be provided. The SPPS states that in relation to housing a plan, monitor and manage approach is necessary to ensure as a minimum, a 5 year supply of land is maintained as such LDPs should provide for a managed release of housing land. This includes the adoption of a sequential approach for the release of housing land within settlements over 5,000 population in the interest of sustainable development and compact urban forms.

Not discussed at POP stage.

This policy was not presented at the POP stage of the LDP process. General comments made in relation to ensuring Council is able to deliver housing throughout the plan period and beyond.

Post consultation consideration N/A

SGS5: Management of Housing Supply

The LDP policy approach set out in the draft Plan Strategy is, at LPP stage, to zone housing land in main and small towns. In order to achieve compact urban form and to actively manage the release of legacy housing zonings outside the urban footprint such lands within the 3 main towns and Greenisland (our settlements with over 5,000 population) will be phased.

Sites to be zoned will be 0.2 hectares or above or capable of accommodating 10 dwelling units+. This threshold was chosen to correspond with the size of Type 1 sites in our Urban Capacity Study.

Sites to be zoned may include those:

- with live residential permissions/current residential applications likely to be approved (also identified as phase 1 in 3 main towns and Greenisland);
- previously developed and undeveloped land within the urban footprint (also identified as phase 1 in 3 main towns and Greenisland)- to help met RDS direction to locate the majority of new housing in appropriate brownfield sites within the urban footprint;
- existing housing zonings/whiteland in the urban fringe of settlements with a population over 5,000 where their strategic housing allocation would be met by live permissions, urban capacity sites and windfall potential (identified as phase 2);
- accessible locations in the urban fringe/within extended settlement limits in remaining small towns where there is either:
 - a deficit in meeting their strategic housing allocation after completions/permissions/urban capacity sites and windfall potential have been considered; or
 - where urban capacity sites or windfall potential would not meet affordable housing need.

In addition, windfall housing within the urban footprint will be permitted subject to meeting the General Policy and other provisions of the LDP.

Councillor & PMT Comments No changes further to above consultations.



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