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Forward Planning Team
 Antrim and Newtownabbey Borough Council
 Mossley Mill
 Carnmoney Road North
 Newtownabbey
 BT36 5QA

BY HAND & E-MAIL

20 September 2019

Our Ref: JFM1000

E: conor@clydeshanks.com

Dear Sirs,

REPRESENTATION TO LOCAL DEVELOPMENT PLAN (LDP) ANTRIM & NEWTOWNABBEY DRAFT PLAN STRATEGY, LANDS AT AND EXTENDING BETWEEN CASTLE ROAD AND BARNISH ROAD, RANDALSTOWN (JFM CONSTRUCTION LTD)

We write on behalf of our client JFM Construction Ltd in relation to the Council's recently published draft Plan Strategy. This representation relates to the strategic theme of housing, and also provides commentary on our client's lands on the eastern edge and adjacent to the Settlement Development Limit (SDL) of Randalstown (See Annex 1).

Introduction

The draft Plan Strategy (dPS) published in July 2019 sets out a range of strategic planning issues and is the second formal publication in the preparation of the LDP for the Antrim & Newtownabbey (A&N) council area. The dPS aims to stimulate public comment and facilitate meaningful engagement with the preparation of the LDP in order to help identify relevant local issues which should be considered at the outset.

The dPS is one of two development plan documents which, when combined with the Local Policies Plan (LPP) will form the LDP for the Borough.

As stated above, this representation focuses on the strategic theme of housing (notably the Council have removed their Randalstown as a candidate for a Strategic Employment Location 'SEL') and the Spatial Growth Strategy which takes direction set by the Regional Development Strategy (RDS) in order to ensure that settlements within the Borough are sustainable to live, work and visit.

This representation provides commentary on the strategic key issues of the settlement hierarchy, housing growth and housing allocation.

Recognising that the preparation of the LDP is still on-going and future components of the LDP are forthcoming, our client reserves the right to comment further on the subsequent LDP publications.

Note this representation follows on from our previous representation to the council's Preferred Options Paper (POP) submitted on 23 March 2017 reference POP/PR/013 (see **Annex 1**).

Site Context

The site borders the eastern edge of the SDL of Randalstown which is identified as a town in the proposed Settlement Hierarchy (Antrim & Newtownabbey dPS: fig 3, p71). The total ownership/control extends approx. 27.14 ha comprising largely undeveloped agricultural land, part developed (dwelling and implemented foundations, access and curtilage) and a belt of mature trees.

The site is bound to the north by the Barnish Road and defined by a mixture of hedgerows and fencing to the north, south, east and west. The topography of the site comprises undulating land with an existing residential development bordering the site to the east.

Strategic Matters

Spatial Growth Strategy

The dPS for A&N proposes to re-classify Randalstown from a 'Local Town' (Tier 5) to a 'Town' (Tier 4) in the proposed Settlement Hierarchy (A&N dPS Table 1: The Places of our Borough p66). This re-classification is welcomed and we contend that it is imperative to recognise the growing service / function of Randalstown in line with Strategic Objective (c) of the Spatial Growth Strategy which states;

'Consolidate the role of the towns of Crumlin and Randalstown as local service centres for housing, employment, facilities and services to support the local population and their rural hinterlands' (A&N dPS Spatial Growth Strategy, Strategic Objective 'C') p65).

Similar to the POP, Randalstown by the Councils own analysis provides a clear opportunity for growth given its commuting distance to Belfast, Metropolitan Newtownabbey, Antrim and location on arterial routes and growing population.

Housing Allocation

It is noted that Strategic Policy (SP) 4.2 *Housing Growth and Allocation* seeks to facilitate the delivery of at least 9,750 new homes across the Borough over the Plan period 2015 – 2030 (Antrim & Newtownabbey dPS SP 4.2 p134).

The new housing allocation proposes an approximate split of 750 units to be allocated to the rural area and 9,000 units to be allocated in the various settlements across the Borough. This is based on an average build out rate of 650 dwellings per annum multiplied by the plan period of 15 years (see Table 1 below).

Table 1 LDP 2030 Housing Growth Figures 2015 – 2030

1	HGI average build rate		554
2	Pre-crash build rate		748
3	Housing Growth average build rate	average of rows 1 and 2	650
4	Housing growth 2015-2030	Row 3 x 15 years	<u>9750</u>

Source: A&N dPS - Evidence Paper 6; Housing p27

It is recognised that the new housing allocation results in a significant reduction (3250 units) from the previous figure proposed in the Council's POP of 13,000 units over the plan period.

This reduction in housing allocation comes as a result of the removal of a 5 year housing land supply being incorporated at the end of the plan period.

It is recommended that the housing allocation afforded to the Borough maintains this 5 year housing land supply as originally proposed at POP stage in order to facilitate an adequate and available supply of housing at the end of the plan period.

The provision of a 5 year housing land supply provides a sound approach to a balanced distribution of housing across the Borough and will facilitate the delivery of housing demand beyond and during the period at which the plan enters its monitoring stage and can be zoned accordingly for same at the LPP stage.

Alternatively given that the current progress of LDP publications which is not in line with the proposed timetable (as revised in July 2018), from our analysis it's likely the LPP will not become adopted until quarter 4 2025/26. At present this will only allow a shelf life of four years before the plan expires which will not allow time for a 5 year review before the LDP's end date. Therefore extending the plan period to at least 2031 will allow for a minimum of 5 years to pass before the 5 year review / monitoring period commences. However, not do either could potentially leave the Council exposed with a shortfall of available housing land at the end of the plan period.

While it is accepted that the Council are not intending to undertake any de-zoning during the preparation of the LDP it cannot be guaranteed that existing zonings identified in the draft / adopted Belfast Metropolitan Area Plan (dBMAP / BMAP) will come forward for development either due to deliverability issues, market conditions and/or land owner appetite.

It is also understood that the Council intend to undertake a full assessment of the deliverability of existing zonings at LPP stage, however this exercise could prove futile if there is no mechanism to de-zone sites that are not likely to be developed. Therefore, in order to ensure that there will be an available capacity remaining (that is likely to come forward for development) at the end of the plan period the Council should give serious consideration to increasing the total housing allocation incorporating the 5 year housing land supply.

Randalstown Housing Allocation

The dPS for A&N proposes a housing allocation of 350 units for Randalstown (a reduction of 300 units from POP stage) over the plan period based on a build out rate of 650 units per annum representing approximately 3.6% of the total housing allocation (*Table 6: Allocation of Housing Growth 2015 – 2030, A&N dPS p135*).

As alluded to in the previous section, it is recommended that the Council re-introduce the 5 year housing land supply to ensure a sound and balanced approach for housing distribution across the Borough particularly after the end date of the plan period in 2030 which is very likely to arrive before the first 5 year monitoring review. This will ensure that the Council will not run the risk of running out of adequate and available housing land supply and the end of the plan period particularly if previous trends continue whereby many of existing housing zonings do not come forward for development.

This is illustrated in Table 12 of Evidence Paper 6: Housing where approximately 21% / 2088 units (uncommitted zonings) of the existing housing zonings have not come forward for development since they were originally zoned in the old Antrim Area Plan 1984 - 2001 and therefore are very unlikely to contribute to the housing growth during the plan period (**See Annex 2**).

It is recognised that the majority of existing zonings within Randalstown are either built out or exist as committed housing sites. Evidence Paper 6 identifies Randalstown as having a remaining capacity of 277 units, however 78 units of this potential yield are located on sites that have not come forward development since they were originally zoned. Therefore we would question the soundness of the Council's assertion of the current capacity of Randalstown as it is very likely that there may be fundamental concerns relating to the deliverability of these sites particularly zoning reference 7B which is located within the floodplain (**See Annex 3**).

Site Specific Matters

The following sets out the high level merits of the land and proposal for progressing this site as a candidate for a large scale mixed use scheme.

The site is strategically located on a major interchange connecting B52, A6, M22 and M2. Randalstown is north-west of Antrim, east of Toome and south of Ballymena. The site is bound by the SDL to the west which comprises residential and economic development the A6 to the south and Barnish Road to the north.

The site has a number of permissions for a nursing home and infill dwellings (some of which have been implemented). This combination advocates the site as a robust candidate for growth both for housing and economic development land. In terms of any environmental constraints (**see Annex 1**), it is clear that this site is the optimum location for new housing in the revised SDL of settlement given that it is absent from any significant landscape, flood plain and/or built heritage matters which impacts on alternative sites bordering the wider SDL of Randalstown to the south and west.

Draft and Indicative Masterplan

To inform this representation, a design team supported by a roads engineer has appraised the site. See **Annex 4** for a high level concept predicated upon;

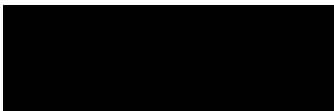
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- Residential development to the north and west;
- Economic development to east (c. 6 ha) – this was incorporated to reflect the then Councils SEL direction in the POP;
- Relief road – added traffic network benefits to reduce traffic flows coming from Barnish Road having to currently go into the town to use the M22/M2;
- Expand the ‘park and share’ – potential for a new and larger park and ride (c 0.27 ha of the site); and
- Ability to provide a linear greenway through the site and exploit extant landscape features

I trust this representation is clear in setting out our advocacy of the strategic matters and our intention moving forward to advocate the said lands.

Should you require any further information and/or clarification, please do not hesitate to contact me.

Yours Sincerely,



Conor Cochrane
Senior Planner

Enc.

cc. JFM Construction Ltd

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ANNEX 1

PREFERRED OPTION PAPER REPRESENTATION

Mr. John Linden
Antrim and Newtownabbey Borough Council
Planning Section
Mossley Mill
Carnmoney Road North
Newtownabbey
BT36 5QA

BY POST

23 March 2017

Our ref: JFM1000

E: thomas@clydeshanks.com

Dear Sirs,

ANTRIM AND NEWTOWNABBEY LOCAL DEVELOPMENT PLAN (LDP) 2030 – PREFERRED OPTIONS PAPER (POP) REPRESENTATION: LANDS AT AND EXTENDING BETWEEN CASTLE ROAD AND BARNISH ROAD, RANDALSTOWN (JFM CONSTRUCTION LTD)

I refer to the above matter and now enclose our representation relating to the above lands on behalf of our client JFM Construction Ltd.

The purpose of the representation is to set out our client's ambition to have the lands brought within the settlement development limit (SDL) of Randalstown and zoned for future mixed use development comprising employment and housing land for the new plan period to 2030 based upon the findings of the POP, Housing Growth Indicators (HGIs) and A&N Council Local Development Plan 2030 Evidence Paper 'Meeting the Needs of Society' January 2017.

Site Context

The site (see Annex 1) bounds the eastern edge of the SDL of the local town (proposed as a 'Town as part of the PoP) of Randalstown. The site, circa. 27.14 ha in size (67.06 acres) comprises largely undeveloped agricultural land, part developed (dwellings and implemented foundations, access and curtilage) and a stand of mature trees.

The site is bordered by a mixture of hedgerows and fencing to the north, south, east and west boundaries. The site sits immediately adjacent to residential development to the west and bound to the north by Barnish Road and by the Castle Road/roundabout to the south. The topography comprises undulating land.

Strategic Matters

Housing

We advocate A&N Council's Preferred Options for 'Housing Allocation and Distribution' (HAD) and 'Grow Local Towns and Selected Villages' (GLTSV).

The Council has adopted a balanced approach by preferring Option (4) for HAD which advocates 13,000 dwellings (average 650 per annum plus additional 5 year land supply) predicated on average build rate and HGI rate over the new plan period which takes cognisance of the Housing Growth Indicators (HGIs) provided by DfI against pre-recession build rates. This is a pragmatic approach pursuant to the SPPS objective of facilitating an adequate and available supply of quality housing to meet the needs of everyone and is to be welcomed.

We further advocate the Council's preferred Option (1) regarding GLTSVs.

In particular, we consider growing the town of Randalstown (Option 1 – forecast 650 additional units required, shortfall of 90 added to the 560 unit extant supply) as an obvious candidate. The PoP on page 86 states that;

'...this growth allocation option may eventually lead to new land being identified for housing in the Local Policies Plan for Crumlin, Randalstown...'

The following two tables below articulates how the Council calculated this figure and the uptake of zoned housing land in 2015.

COMPLETE IN 14/15 SURVEY YEAR

DEVELOPMENT ON-GOING

NOT STARTED

HOUSINGZONING/HOUSING LANDUSE POLICY AREA

	REMAINING POTENTIAL UNITS	UNITS BUILT 14/15	UNITS DEVELOPED 14/15	AREA REMAINING
GREENFIELD	229	0	0	13
URBAN FOOTPRINT	331	1	0.05	13

Housing Monitor 2015 (source: A&N Council dated Jan 2017 'Annual Housing Monitor 2015')

Table 11: Uptake of zoned housing land at March 2015

Location	Zoned through the extant plan (hectares)	Area Remaining on zoned land (hectares)	Remaining potential on zoned land (units)	% of zoned land remaining
Metropolitan Newtownabbey	270.4	124.22	3,169	46.2
Antrim Town	177	77.18	2,164	43.6
Ballyclare	183	149.17	3,082	81.5
Crumlin	45	6.24	168	13.8
Randalstown	45	10.65	269	23.6
BMAP Villages	44.22	14.41	342	32.5
Total	763.62	381.87	9,194	50

PoP and Local Development Plan 2030: Evidence Paper Meeting the Needs of Society January 2017 (source: A&N Council)

Evidence Paper 'Meeting the Needs of Society' January 2017 para 3.63 further states that;

'...There is however significant spatial variation amongst the settlements. Crumlin and Randalstown have quite limited amounts of zoned housing land remaining...'

Randalstown, by the Council's own analysis presents a clear opportunity for growth given its commuting distance to Belfast, Metropolitan Newtownabbey, Antrim main hubs, airport and location on arterial routes and growing population which has resulted in a shortfall of future land supply.

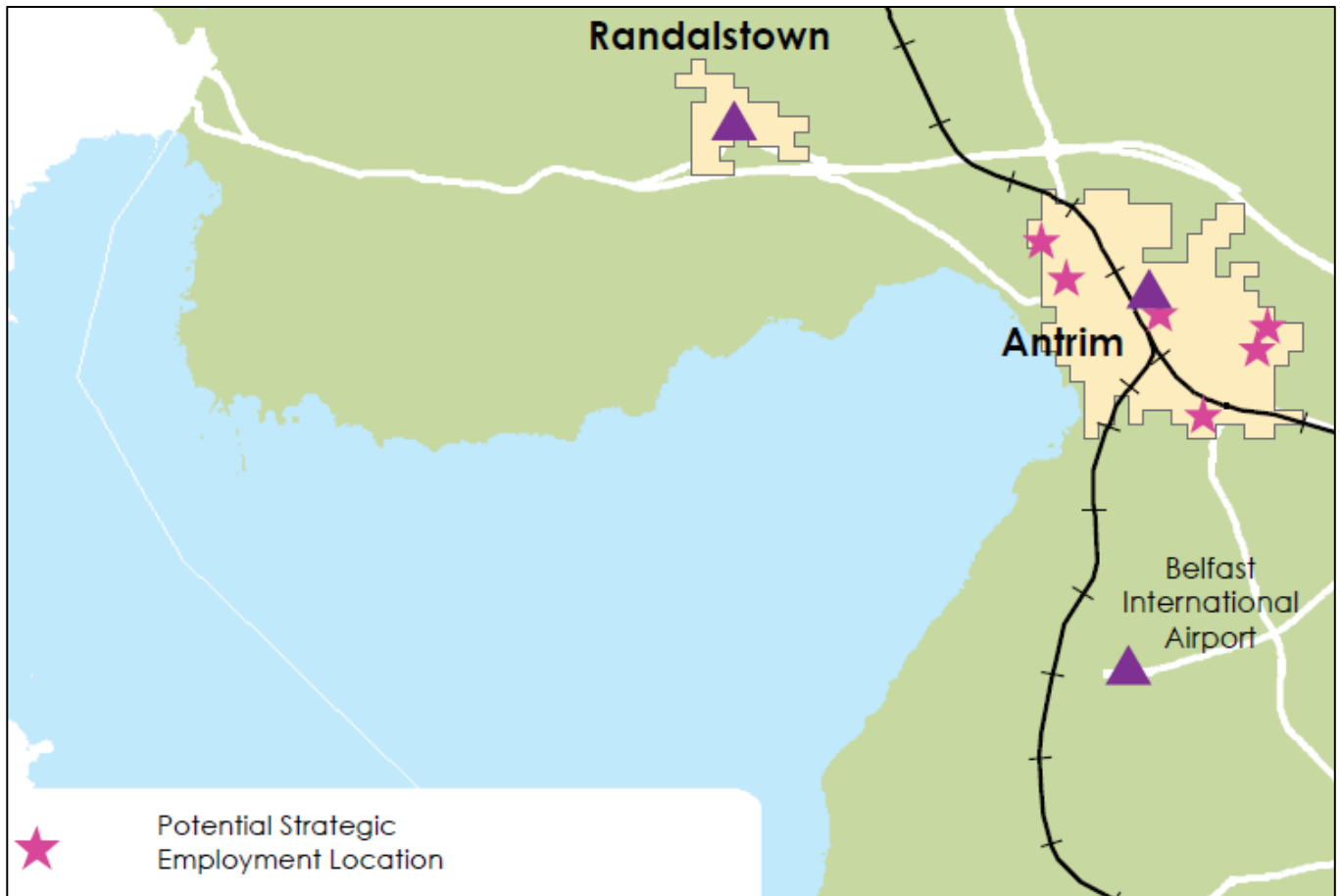
We recognise that the preferred options for the HAD and GLTSV are subject to change but, even when framed against the alternative mainstream options presented by the Council, ensure that Randalstown is a settlement that will likely secure additional land moving forward into the new plan period.

In closing, we advocate the Councils preferred respective options, Option 4 relating to HAD and Option 1 relating to GLTSV particularly for the Randalstown for the new plan period.

Employment

We note the Councils preferred option in respect of new Strategic Employment Locations (SELs) Sub-Option 2b which allows the Council to provide and maintain appropriate protection to those larger strategically located employment sites in the Borough and consider the need for additional sites to promote job creation and employment prospects throughout the key settlements of the Borough

There is acknowledgment within the PoP that there are currently no areas of employment land greater than 10 hectares in either Crumlin or Randalstown and that in terms of identifying new sites it is proposed that any future SEL should be situated in or near to our largest settlements and in a favourable position in relation to key transport infrastructure anticipating that consideration of new SELs is likely to focus on the settlements such as Randalstown – as per below.



Site Specific Matters

The following sets out the high level merits of the land and proposal for progressing this site as a candidate for a large scale mixed use scheme.

The site is strategically located on a major interchange connecting B52, A6, M22 and M2. Randalstown is north-west of Antrim, east of Toome and south of Ballymena. The site is bound by the SDL to the west which comprises residential and economic development the A6 to the south and Barnish Road to the north.

The site has a number of permissions for a nursing home and infill dwellings (some of which have been implemented). This combination advocates the site as a robust candidate for growth both for housing and economic development land.

In terms of any environmental constraints (see Annex 2), it is clear that this site is the optimum location for new housing in the revised SDL of settlement given that it is absent from any significant landscape, flood plain and/or built heritage matters which impacts on alternative sites bordering the wider SDL of Randalstown to the south and west.

Given the above, we consider that this location represents a site which, addresses the shortfall in housing and is the ideal site for a SEL in Randalstown given its location and proximity to a main arterial route/transport corridor.

Draft and Indicative Masterplan

To inform this representation, a design team supported by a roads engineer has appraised the site. See Annex 3 for a high level concept predicated upon:

- residential development to the north (c. 6.6ha – thus could accommodate at least 90 units);
- economic development to the south (c. 16ha) – thus substantial supply of land required for a new SEL which would complement the extant economic development to the west;
- relief road – added traffic network benefits to reduce traffic flows coming from Barnish Road having to currently go into the town to use the M22/M2;
- expand the ‘park and share’ – potential for a new and larger park and ride (c. 1.25ha site); and
- ability to provide a linear greenway through the site and exploit extant landscape features.

I trust this representation is clear in setting out our advocacy of the strategic matters and our intention moving forward to advocate the said lands.

Should you require any further information and/or clarification, please do not hesitate to contact me.

Yours sincerely,



Thomas Bell

Associate

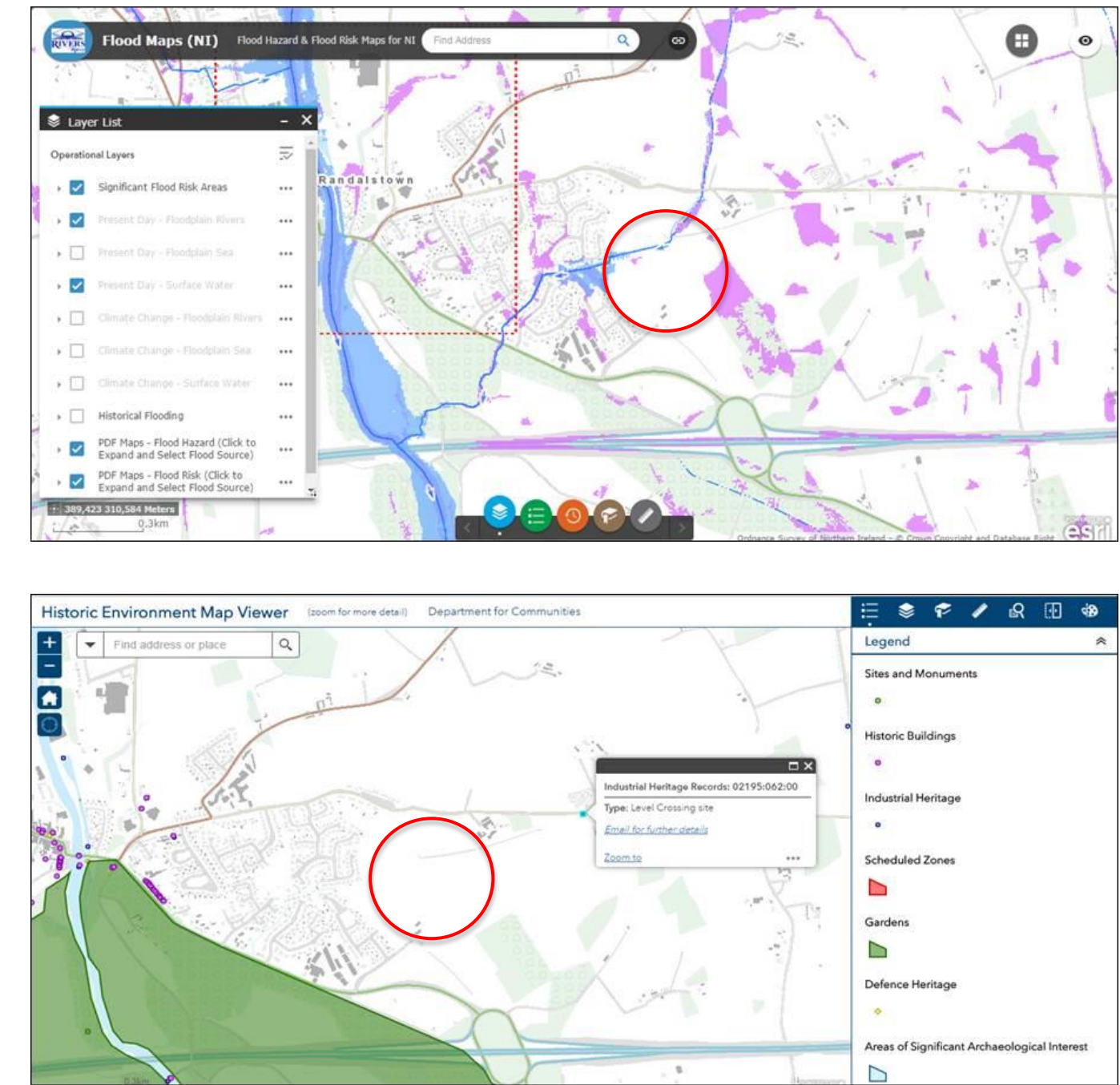
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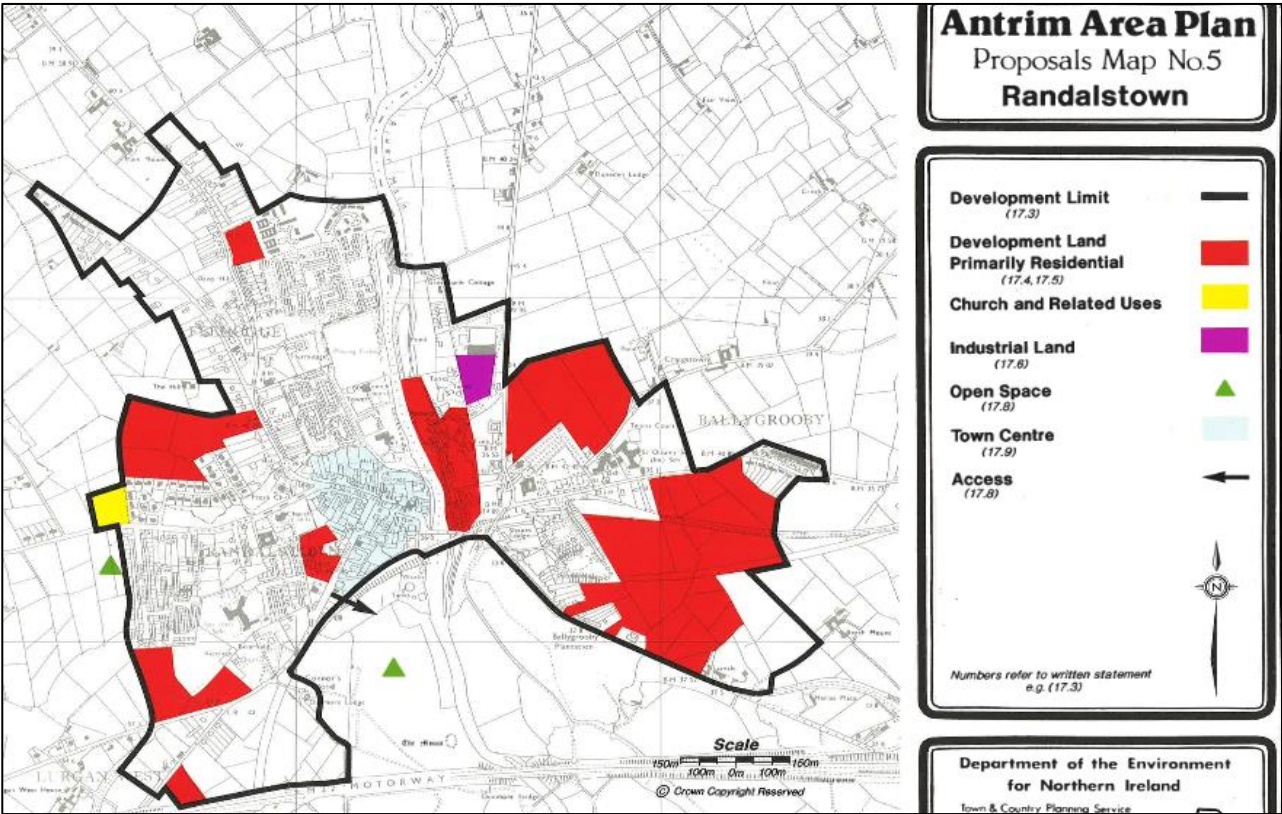
cc. JFM Construction Ltd.

Annex 1 – Site Location Plan

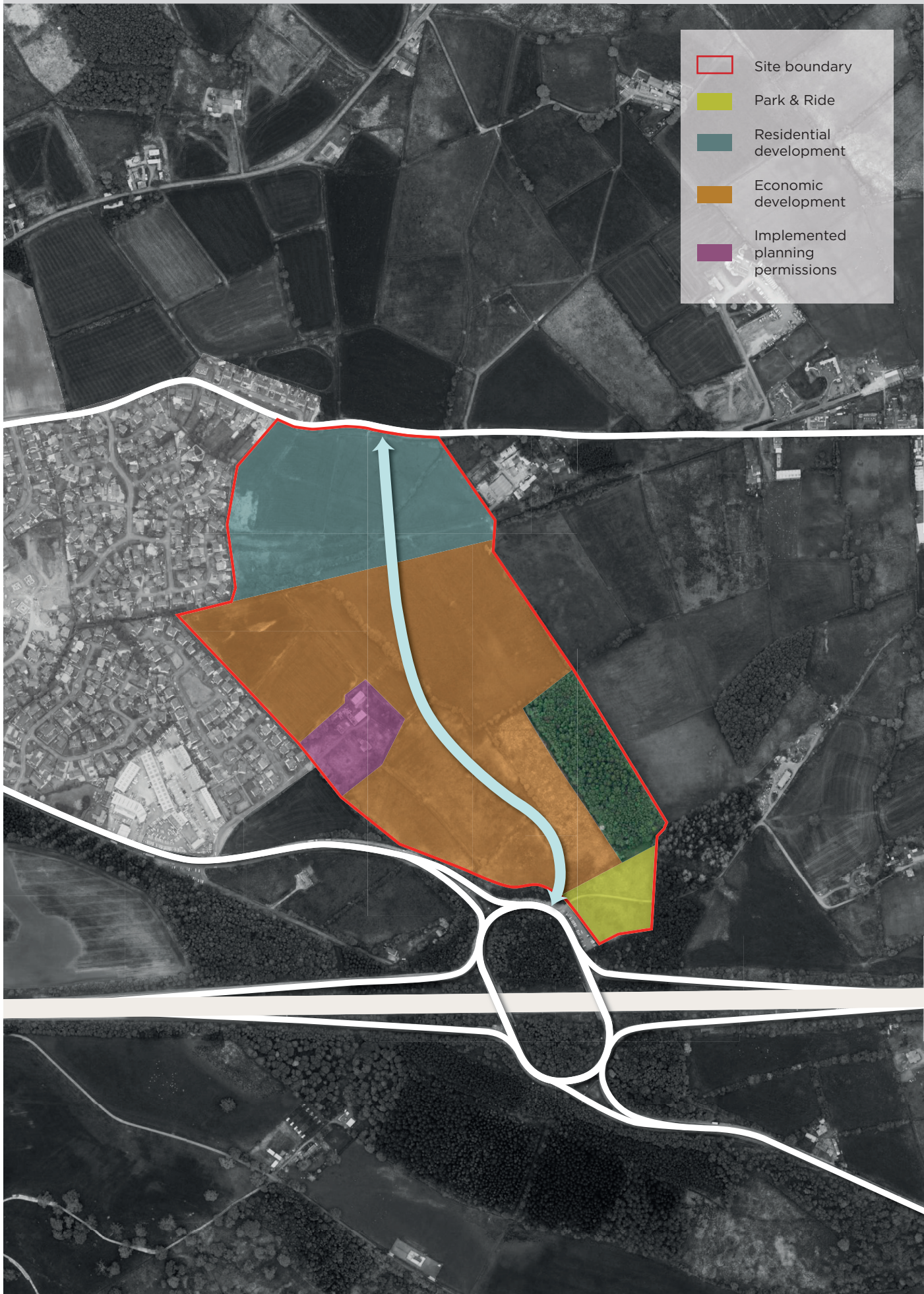


Annex 2 – DAERA Strategic Flood Map, Built Heritage and Area Plan Extracts





Annex 3 – Draft and Indicative Masterplan



Concept Plan



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ANNEX 2

TABLE 12 ANTRIM & NEWTOWNABBEY DPS (EVIDENCE PAPER 6)

		COMMITTED RESIDENTIAL UNITS						POTENTIAL ADDITIONAL UNITS				TOTAL POTENTIAL UNITS
Location	Housing Allocation	Built since 2015	Extant Units - Site Commenced	Extant Units - Site Not Started	Uncommitted Zoning	Windfall	Sub-total	Urban Capacity	Uncommitted Greenfield	DOS	Sub-total	TOTAL
Metropolitan Newtownabbey	3900	637	1650	622	1114	549	4572	717	30	n/a	747	5319
Antrim	2750	232	1155	1494	100	252	3233	787	1292	n/a	2079	5312
Ballyclare	1100	176	417	1998	701	90	3382	44	85	n/a	129	3511
Crumlin	350	99	176	14	0	117	406	25	0	n/a	25	431
Randalstown	350	13	130	179	68	63	453	139	59	n/a	198	651
Ballynure	60	15	8	1	0	n/a	24	n/a	n/a	0	0	24
Ballyrobert	35	29	22	13	2	n/a	66	n/a	n/a	14	14	80
Burnside	50	13	15	1	33	n/a	62	n/a	n/a	60	60	122
Doagh	75	15	51	131	70	n/a	267	n/a	n/a	0	0	267
Dunadry	10	0	5	19	0	n/a	24	n/a	n/a	0	0	24
Parkgate	10	11	6	13	0	n/a	30	n/a	n/a	23	23	53
Straid	5	0	0	0	0	n/a	0	n/a	n/a	3	3	3
Templepatrick	100	31	86	42	0	n/a	159	n/a	n/a	53	53	212
Toome	55	10	175	19	0	n/a	204	n/a	n/a	219	219	423
Hamlets	150	29	86	38	n/a	n/a	153	n/a	n/a	142	142	295
Countryside	750	750 (2015-30)	n/a	n/a	n/a	n/a	750	n/a	n/a	n/a	n/a	750
TOTAL	9750	2060	3982	4584	2088	1071	13785	1712	1466	514	3692	17477

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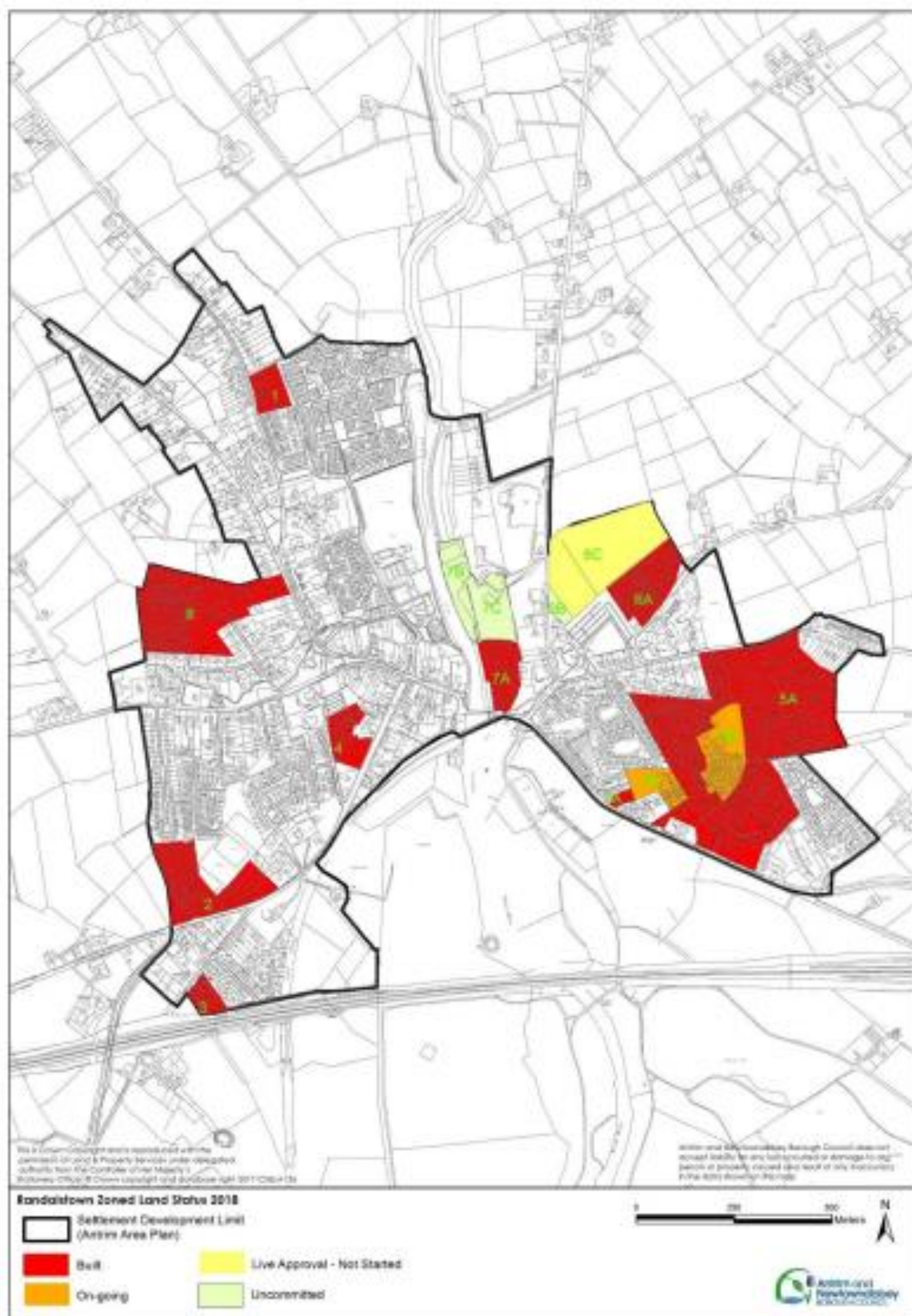
ANNEX 3

RANDALSTOWN HOUSING MONITOR ANTRIM & NEWTOWNABBEY DPS (EVIDENCE PAPER 6)

Randalstown

As indicated below, within Randalstown, the majority of extant housing zonings are committed, while the 3 uncommitted sites are located well within the urban footprint of the settlement.

RANDALSTOWN Zoned Land 2018			
MAP REF	STATUS	REMAINING POTENTIAL	NOTES
1	Built	0	
2	Built	0	
3	Built	0	
4	Built	0	
5a	Built	0	
5a	Built	0	
5a	Built	0	
5b	Development On-going	46	
5c	Development On-going	16	
6A	Built	0	
6B	Uncommitted	8	
6C	Live Approval -Not Started	137	
7A	Built	0	
7B	Uncommitted	35	majority of site is water, site yield therefore reduced
7C	Uncommitted	35	
8	Built	0	
8	Built	0	
8	Built	0	
8	Built	0	
8	Built	0	
		277	



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ANNEX 4

CONCEPT PLAN LANDS EAST OF THE SDL OF RANDALSTOWN



Legend

-  Primary Access Point
-  Primary Route
-  Indicative Secondary Route
-  Residential Land Use
-  Commercial / Business Land Use
-  Park and Ride

Project
Land North of Castle Road
Randalstown

Drawing Title
Land Use Plan

Date	Scale	Drawn by	Check by
08-04-19	1:2500@A2	HJ	MW
Project No	Drawing No	Revision	
28745	Ind05	E	

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