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Forward Planning Team
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BY HAND & E-MAIL

20 September 2019

Our Ref: JAC1000

E: conor@clydeshanks.com

Dear Sirs,

REPRESENTATION TO LOCAL DEVELOPMENT PLAN (LDP) ANTRIM & NEWTOWNABBEY DRAFT PLAN STRATEGY, LANDS AT CARRICKFERGUS ROAD, BALLYNURE (IVAN JACKSON)

We write on behalf of our client Mr. Ivan Jackson 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 at the Carrickfergus Road, Ballynure – see **Annex 1** Site Location.

The purpose of this representation is to set out our client's intention to have lands brought within the settlement development limit (SDL) of Ballynure and zoned for housing in the new plan period 2030.

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 as well as 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 06 March 2017 reference POP/PR/015 (see **Annex 1**).

Site Context

The site (**Annex 1**) is bound to the south west by the SDL of the village of Ballynure. The site, circa. 2.6 ha in size (6.5 acres) consists of undeveloped agricultural land.

The site is bordered by mature trees/hedgerows/tributary to the east and south of the site and a post/wood fencing is located to the north, and west boundaries enclosing the site. The site sits immediately adjacent a completed residential development using an access from Castle Road onto Castlebrook Avenue notably acting as the SDL interface. The site topography gently falls from Castle Road towards the south. It should be noted that there is a live planning application (LA03/2016/0546/F) seeking to develop a further two detached dwellings and ancillary single storey garages on the SDL at entrance to Castlebrook Avenue.

Strategic Matters

Spatial Growth Strategy

Ballynure is identified as a 'Village' (Tier 5) in the proposed settlement hierarchy (Table 1: The Places of our Borough, A&N dPS p66). Page 65 of the dPS for A&N under Strategic Objective (d) aims to;

'Sustain and maintain the role of our villages as centres for providing opportunities for housing and employment of an appropriate scale and character to individual settlements'.

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 in 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: 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 Preferred Options Paper (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. 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.

Ballynure Housing Allocation

The dPS for A&N proposes a housing allocation of 60 units for Ballynure (a reduction of 115 units from POP stage) over the plan period based on a build out rate of 650 units per annum representing approximately 0.6% 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 notional end date of the plan period in 2030. 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**).

Site Specific Matters

The following sets out the high level merits of the land and proposal for progressing this site as a candidate for additional housing lands in Ballynure.

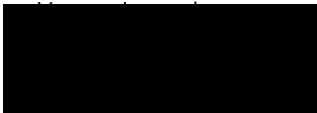
The site, is bound by the SDL to the south west (housing), north (Castle Road), and south/east by a tributary and mature tree line. The site demonstrates a, opportunity for residential development due to its proximity to existing residential development/topography and access arrangements. Furthermore, the topography of the site lends itself to not requiring extensive retaining structures.

Due to the site's proximity to the existing residential development (south west), there is an enabling opportunity to link both residential schemes if brought into the SDL, which would allow orderly residential development/rounding off opportunity.

In terms of environmental constraints, the site is not affected by historical/scheduled areas, however it should be noted that there is a small tributary identified south of the site.

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.



Conor Cochrane
Senior Planner

Enc.
cc. Mr Ivan Jackson

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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

27 March 2017

Our ref: JAC1000

E: gavinmcg@clydeshanks.com

Dear Sirs,

ANTRIM AND NEWTOWNABBEY LOCAL DEVELOPMENT PLAN (LDP) 2030 - PREFERRED OPTIONS PAPER (POP) REPRESENTATION: LANDS IMMEDIATELY EAST OF 33 CASTLEBROOK AVENUE, BALLYNURE, BT39 9GX (IVAN JACKSON)

I refer to the above matter and now enclose our representation relating to lands immediately east of 33 Castlebrook Avenue, Ballynure, Co. Antrim on behalf of our client Mr. Ivan Jackson.

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 Ballynure and zoned for housing for the new plan period 2030 based upon the findings of the POP, Housing Growth Indicators and A&N Council Local Development Plan 2030 Evidence Paper Meeting the Needs of Society January 2017.

Site Context

The site (Annex 1) is bound to the south west by the SDL of the village of Ballynure. The site, circa. 2.6 ha in size (6.5 acres) consists of undeveloped agricultural land.

The site is bordered by mature trees/hedgerows/tributary to the east and south of the site and a post/wood fencing is located to the north, and west boundaries enclosing the site. The site sits immediately adjacent a completed residential development using an access from Castle Road onto Castlebrook Avenue notably acting as the SDL

interface. The site's topography gently falls from Castle Road towards the south. It should be noted that there is a live planning application (LA03/2016/0546/F) seeking to develop a further two detached dwellings and ancillary single storey garages on the SDL at entrance to Castlebrook Avenue.

Strategic Matters

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 common sense approach pursuant to the SPSS 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 local 'selected' village of Ballynure (Option 1 – forecast 175 additional units required, shortfall of 148 added to the 27 unit extant supply) as an obvious candidate. The table below articulates how the Council calculated this figure.

Site ID	Potential units	Units complete	Remaining potential	Built 14/15	Site area	Area developed	Area developed 14/15	Remaining	Status
218553	6	1	5	0	0.153	0.02	0	0.133	Dev ongoing
219775	22	13	9	8	0.39	0.3	0.2	0.09	Dev ongoing
219776	1	0	1	0	0.07	0	0	0.07	Dev ongoing
218140	4	0	4	0	0.13	0	0	0.13	Not started
218555	2	0	2	0	0.098	0	0	0.098	Not started
219777	6	0	6	0	0.26	0	0	0.26	Not started
			27	8			0.2	0.8	

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

Ballynure presents an optimum village for growth given its commuting distance to Belfast, Metropolitan Newtownabbey, Antrim and Larne, 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 ensures that Ballynure is a settlement that will secure additional land moving forward into the new plan period, if not before then.

We further consider that the baseline figures (27 units of current land supply) presented for Ballynure to be since superseded from when the Council undertook their empirical survey in 2015 and therefore as of March 2017, there is plainly not the land supply envisaged or required to accommodate the interim period required to adopt the new plan.

We acknowledge that supply is not a static figure and anticipate that the Council will address same post receiving the DfI recommendations/view on the Councils POP and receipt of representation on strategic matters.

Our review, based on site inspections, shows that the supply remaining appears completely depleted.

Site ID	Potential units	Units complete	Remaining potential	2017 Note	2017 Remaining potential
218553	6	1	5	Built	0
219775	22	13	9	Built	0
219776	1	0	1	Built	0
218140	4	0	4	Removed – see below	0
218555	2	0	2	Yield is 'like for like'	0
219777	6	0	6	Built	0
			27		0

The baseline figure requires review due to:

1. recent construction of committed sites since March 2015 (when the Council reviewed building control completions);
2. zoning BNE03/O1 will not be developed. We understand that this land will not be developed given that it is used for a butcher shops carpark and is required for the future expansion of their business;
3. the initial projected new plan adoption programme has overrun.

In closing, we advocate the Councils preferred respective options, Option 4 relating to HAD and Option 1 relating to GLTSV particularly for the selected village of Ballynure for the new plan period. We also consider that the figures

presented for Ballynure show an obvious shortfall in the short term prior to the new plan being adopted and therefore a housing moratorium.

Site Specific Matters

The following sets out the high level merits of the land. The site, is bound by the SDL to the south west (housing), north (Castle Road), and south/east by a tributary and mature tree line. The site demonstrates a, opportunity for residential development due to its proximity to existing residential development/topography and access arrangements. Furthermore, the topography of the site lends itself to not requiring extensive retaining structures.

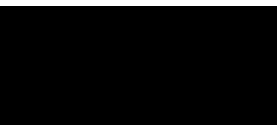
Due to the **site's** proximity to the existing residential development (south west), there is an enabling opportunity to link both residential schemes if brought into the SDL, which would allow orderly residential development/rounding off opportunity.

In terms of environmental constraints the site is not affected by historical/scheduled areas, however it should be noted that there is a small tributary is identified south of the site (Annex 2).

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,



Gavin McGill

Planner

Enc.

cc. Mr Ivan Jackson

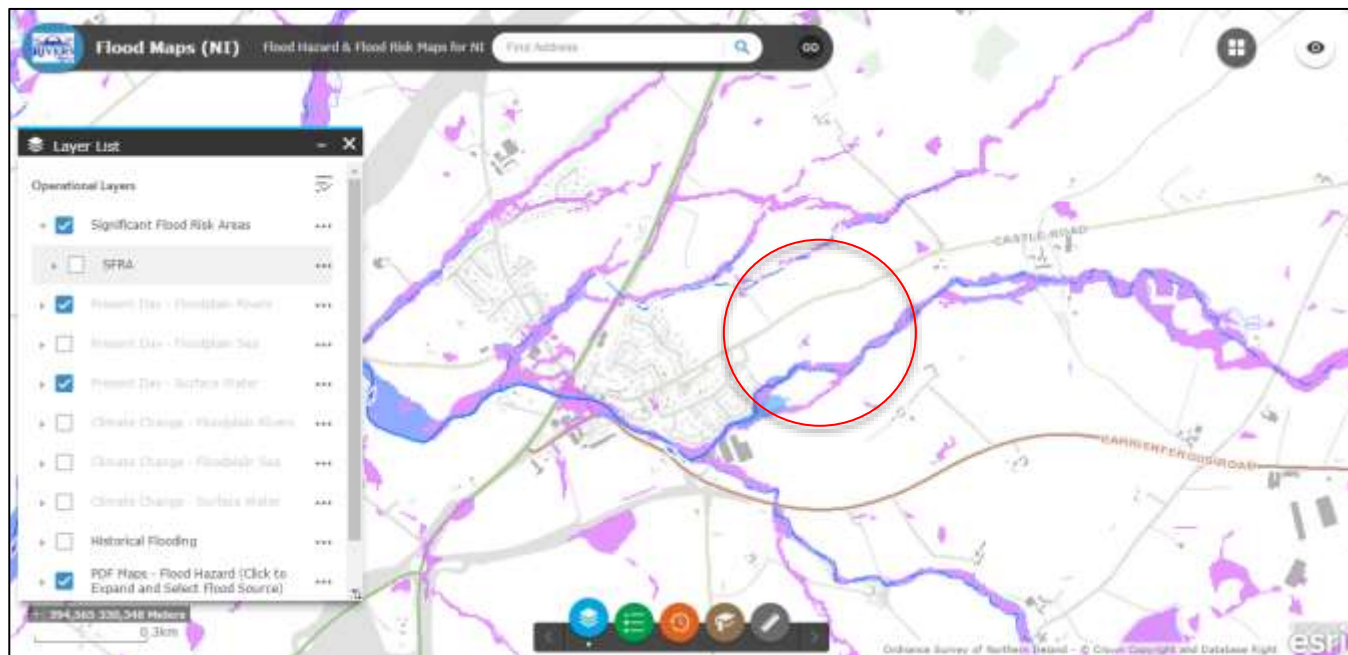
Annex 1 – Site Location Plan



**SITE LOCATION
PLAN**

27 March 2017

Annex 2 – DAERA Strategic Flood Map and Built Heritage Extracts



- The site is bound to the south by a stream



- The site is not affected by historic/scheduled monuments.

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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