

Submitted to Local Development Plan 2030 - Draft Plan Strategy Representations  
Submitted on 2019-09-20 15:32:43

## SECTION A - DATA PROTECTION AND CONSENT

Please tick to confirm that you have read and understood the Council's Local Development Plan Privacy Notice.

I confirm that I have read and understood the Local Development Plan Privacy Notice and I give my consent for Antrim and Newtownabbey Borough Council to hold my personal data for the purposes outlined.:

Yes

## SECTION B - CONTACT DETAILS

Please specify if you are responding as an individual, as an organisation, or as an agent acting on behalf of an individual, group or organisation?

Respondent Type:

I am an Agent

Please specify your contact details:

Title:

Mr

First name:

Robert

Last name:

Logan

Job Title (where relevant):

Architect

Organisation Name (where relevant):

Robert Logan Chartered Architect

Agent Name (If applicable):

Robert Logan

Client Name (If applicable):

Paul Rea

Address:

19 Main Street

Postcode (please enter your full postcode):

BT39 0QL

Telephone number:

02893342855

What is your email address?

Email:

robertloganarchitects@gmail.com

Please Read Before Continuing. . .

## SECTION C - REPRESENTATIONS

Do you consider the draft Plan Strategy to be SOUND or UNSOUND?

I consider it to be 'Unsound'

### Unsound Representation

Please identify which section of the draft Plan Strategy you consider to be UNSOUND:

**Paragraph Number in Document:**

**Policy Heading:**

Strategic Policy 4, Homes

**Strategic Policy (SP) Paragraph Number:**

SP4.3

**Detailed Management Policy (DM) Paragraph Number:**

**Page Number In Document:**

134

**Proposal Map (If relevant state location):**

**Under which test(s) of soundness do you consider this to be UNSOUND:**

CE2 - Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

**Please give details why you consider the draft Plan Strategy to be UNSOUND having regard to the test(s) you have identified above.**

**Unsound Justification:**

System won't let me upload file. I will deliver hard copy

**Upload File:**

No file was uploaded

## **Modifications**

**If you consider the draft Plan Strategy to be 'UN SOUND', please provide details of what, if any, modifications do you think should be made to the section, policy or proposal which your representation relates to? What specific modifications do you think should be made in order to address your representation? Please briefly state how your proposed alternative would meet the requirements of the Sustainability Appraisal and other published assessments.**

**Modifications:**

Error again list. Included within hard copy to be hand delivered

**File Upload:**

No file was uploaded

**If you are seeking a modification to the draft Plan Strategy, please indicate how you would like your representation to be dealt with at Independent Examination:**

Written Representation

**Would you like to submit another representation?**

No

# Representation Seeking Change to the Draft Plan Strategy



Response prepared by Robert Logan Chartered Architects

For

Mr Paul Rea

27 Seskin Road, Straid, Ballyclare, Co. Antrim, BT39 9NG



chartered architect  
**ROBERT LOGAN**



RIBA 

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Representation is made on behalf of our client seeking change to the draft Plan Strategy as it is considered unsound in relation to its coherence and effectiveness and the associated tests within one of the three broad categories, which have been predetermined to test the soundness of the plan. The developed text will seek to show how Test CE2 (the strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base) demonstrates inconsistency of how settlements designated as villages receive housing growth in line with their size and function.

## CONTEXT

Mr Rea operates a farm business with land immediately adjacent to the current development limits of Straid village. He actively engaged in the various public consultations and subsequent planning appeal associated with the Belfast Metropolitan Area Plan. His interests were related to inclusion of an area of farm land to the south east of the village, sandwiched between Seskin Park and 21 Seskin Road. Please refer to Figure 1.

The PAC considered the case as 'Lands at Seskin Road (south of Seskin Park), Objection 1937' and stated the following:

*The site adjoins the SDL south of Seskin Park and is a relatively flat field. . . The SDL does extend southwards of the opposite side of the road as far as No. 21. The site includes an existing dwelling and could be considered to expand the settlement to a logical boundary aligned with the existing dwelling. The portion of the site within the LLPA would remain free of development. The estimated yield was 22 dwellings. . . The Department considered it should be allocated to meet the three-year supply. It was confirmed that there were no issues related to access development. We consider that the site is acceptable for development and should be included in the STLR, subject to the necessary concept plan. . .*

Following legal challenge to BMAP our client has continued to actively engage in the current process, having personally attended the public consultation events and by review of, in particular the Preferred Option Paper, 2017. The document provided options for the allocation of housing growth which is the material factor in our expression of unsoundness to the current draft Plan Strategy. It should be noted within the POP, table 10 lists the allocation under the four options considered. Straid received an allocation of either 25, 35, 55 or 0. The councils preferred Option 1 was for 25. This was broadly in line with the expectation following on from the BMAP appeal.

It is understood that the housing growth figure for the Borough has been reduced since the POP was produced. The figure for 2015-2030 has been identified as 9750 units.

## DETERMINATION OF HOUSING GROWTH

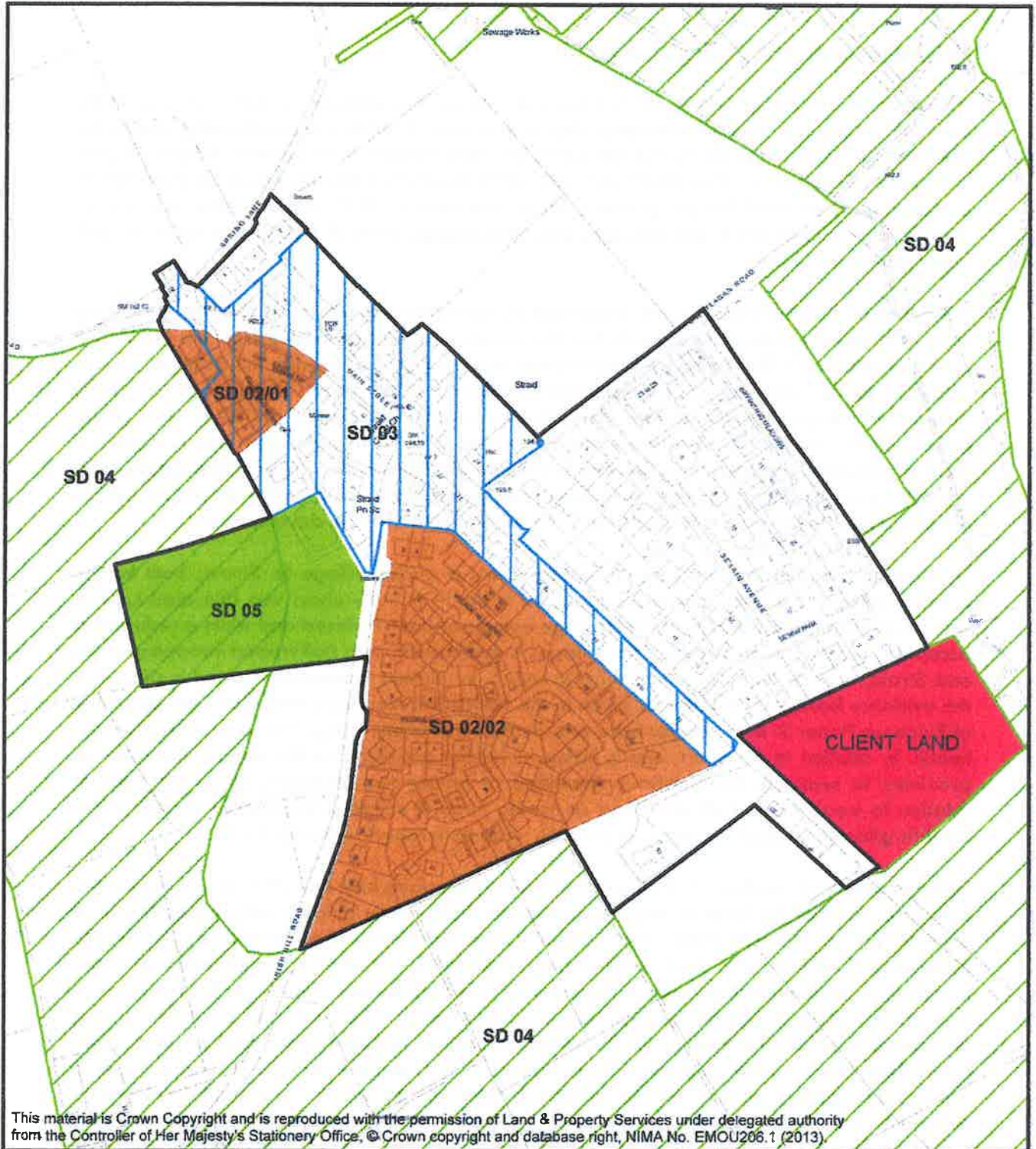
Allocation of housing growth is divided between the various settlements and rural area in the Borough. Straid has received a housing allocation of only 5. While the total housing growth for the Borough has been reduced, the allocation between villages is inconsistent. Evidence Paper 6 : Housing Development Plan 2030 states the SPPS directs that housing should be allocated on a sequential basis which favours growth in larger settlements (10.7), with a smaller allocation to the villages and hamlets in line with their role and function. Each of the villages receives some housing growth (10.13).

It is accepted that there must be an adjustment in expectation for villages in line with the shifting context however we emphasise again that the system of allocation moving from the 2017 POP to the current draft Plan Strategy is inconsistent and unsound. To develop this position, we turn attention to Evidence Paper 2 : Settlement Evaluation. This paper identifies the currently designated villages, including Straid. They have population in the range of 380 – 1440. (8.36) states, smaller villages like Straid are more restricted in terms of population and facilities but have a population, which is considerably more than the hamlet tier. The evidence paper does not state what these restrictions are. Previous consideration of Straid for development, such as BMAP appear to have seen no restriction in terms of possible future development.

To highlight our concern, we compare Ballyrobert, a similar village to Straid, both having primary schools and other community facilities. In the POP Ballyrobert was allocated housing growth of 80 and Straid 25, yet at this stage both have been reduced and while a reduction is accepted, the allocation between the villages is inconsistent, with Ballyrobert dropping to 35 and Straid, a much more significant drop to only 5. In relation to unsoundness and in particular the evidence base, consideration is given to the settlement overviews which form the conclusion of Evidence Paper 2. Both villages have exactly the same utility listings, the same education and health. In relation to transport, one is listing as having proximity to the airport, the other as proximity to seaports. Ballyrobert is identified as having two strengths, Straid has four. In relation to weaknesses, both are listed as having three. It seems unreasonable therefore that Straid's allocation would be reduced by 80% while Ballyrobert was only 56.25%.

Evidence Paper 6, Section 11, Housing Land Supply explains how the SPPS directs the council to take account of the level of housing supply remaining within existing settlements. This is an essential part of the assessment criteria and the principle of retaining undeveloped land within settlements is flawed, in so much as the undeveloped land, it must be assumed, exists only due to a lack of development pressure within the considered settlement. The bias in the reduction of figures seen within village designations has been adjusted to take account of this extant zoning or through windfall. This means that Straid has committed residential unit numbers of 0, while Ballyrobert has 13, with a further 22 commenced. Our view is that while Evidence Paper 2 provides assessment relating to each settlement, ultimately the number of potential new units is skewed to take account of the existing urban capacity. A more robust and proper ordering should surely focus on the qualitative analysis and if necessary, areas with lower development pressure should be adjusted (reduced) to allow more appropriate allocation to areas such as Straid, where there clearly has been and continues to be a demand for new housing. Straid has no uncommitted green field sites. Please refer to the attached letter from Colin Graham Residential who have provided feedback in relation to housing demand.

We have sought to identify how Mr Rea's interests have been impacted due to what we consider to be unsound use of evidence within Evidence Papers 2 and 6. We understand the Commission will proceed on the basis that a representation will be considered in written form only. While our comments focus on Straid village, the weaknesses in how evidence has been applied to reach the allocated housing growth is likely to impact on assessments associated with other settlements within the Borough.



**Belfast Metropolitan Area Plan 2015**  
**Map No. 9 - Straid**

- |  |   |
|--|---|
|  Settlement Development Limit |  Land identified for Open Space  |
|  Housing Land Use Policy Area |  Mr Rea's Land<br>Shaded Colour Red - As may be considered for development |
|  Area of Village Character    |   |
|  Local Landscape Policy Area  |   |

0 50 100 Metres



The Planning Team  
Antrim and Newtownabbey Area Plan  
Planning Section  
Mossley Mill  
Cammoney Road North  
Newtownabbey  
BT36 5QA

12<sup>th</sup> September 2019

Dear Sir/Madam,

## RE PROPOSED NEW HOUSING, STRAID, BALLYCLARE

New government figures for the first quarter of 2019 showed a 3.5% rise in the average price of a home in Northern Ireland, proving itself a strong and resilient market.

As has been the case for the past number of years, demand is currently outstripping supply in the private resale market. In the face of the well documented Brexit uncertainty, we anticipate the housing market to remain steady as, in this market, there is a massive shortfall of new housing following the downturn of 2008 to 2013 when new house building virtually halted.

We estimate that to keep pace with demand around 9,000 new homes should be built year-on-year – and despite an upturn in construction since 2014, this figure is not being met, ultimately leading to increased demand as pressure is put on the supply chain.

According to the new data, the average house price in Northern Ireland stood at £134,811 for the first quarter of 2019, well below the UK average of £226,798.

Average house prices in Northern Ireland remain about five times average salaries, that compares with England and Wales, where the difference is eight-fold.

The affordable level of house prices and potential return on investment is proving attractive to investors – and whilst the market is still dominated by local private buyers – we are seeing more and more interest from buyers outside the market, who are attracted by the value and the average growth of 4% to 5% year on year.

There is also an increased interest from Ireland and the rest of the UK, whilst buyers from Northern Ireland who have lived much of their professional lives elsewhere are choosing to relocate back with young families for the schooling, community and quality of life that Northern Ireland offers.

Straid is a small village in County Antrim, Northern Ireland, approximately three miles east of Ballyclare and circa six miles inland from Carrickfergus. Given its semi-rural, yet very accessible location there is strong demand for homes in this area. Property attracts buyers from not only Straid village but also neighbouring Glengormley, Ballyclare, Carrickfergus and Larne. The recently completely A8 carriageway has added appeal and value to the area also, with Belfast now only being a short commute by car.

There is a definite need for new housing in this area.

Yours faithfully,

Colin Graham  
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Colin Graham Residential  
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