

ANTRIM & NEWTOWNABBEY LOCAL DEVELOPMENT PLAN 2030

Draft Plan Strategy Response

**Park Road/Antrim Road,
Mallusk**

Vaughan Homes

September 2019



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1.0 Introduction

- 1.1 We write on behalf of our client Vaughan Homes in response to the recently published Draft Plan Strategy (DPS), forming part of the wider Local Development Plan 2030 process. This submission follows our initial representation submitted to Council in July 2016 (Council Ref: LDP/REP/08) and relates to lands at the junction of Antrim Road and Park Road, Mallusk.
- 1.2 We write at this stage of the LDP process as these lands are potentially effected by Strategic Policy 2 relating to employment and Strategic Employment Locations (SELs) (SP 2.5-2.7). The lands both South of Antrim Road and North of Antrim Road are identified as SELs. It is assumed that at this stage of the plan preparation, the legacy LDPs are likely to have significant influence on the content of the newly emerging LDP. Given such, our clients lands were previously identified for employment use in BMAP 2015 (MNY 07). We do however note and welcome the reference (SP 2.5) that the precise boundaries of the SEL will be brought forward in the Local Policies Plan (LPP).
- 1.3 It is in this context and to assist the Council in the next stages of the LDP process, we would identify that our client is an established housebuilder and would instead seek to bring the lands forward for housing rather than as the proposed employment use. Given such, there exists no intention to bring these lands forward for an employment related use. Therefore, we would respectfully request that due consideration is given to the re-zoning of the subject lands for housing to ensure these lands can come forward and help achieve Council aspirations of supporting sustainable development. This re-zoning would not offend the Strategic Objectives of ensuring an adequate supply of employment land and would remedy some of the identified shortcomings relating to housing allocations (Policy SP 4) which we believe to be unsound.
- 1.4 Reasoning and justification for this has been expanded upon within this representation. We trust our assessment will be given due regard as part of the newly emerging LDP and Council are of a similar opinion that these lands represent a distinguishable opportunity for rezoning. We respectfully request that this submission, in respect of the housing policies, will be given due cognisance throughout the plan preparation period and dealt with by oral hearing.

2.0 Draft Plan Strategy

- 2.1 The representation lands at Antrim Road are subject to a number of proposed policies within the DPS. Commentary regarding each is set out below.

SP 2: Employment

- 2.2 This policy sets out that, *"the Council will identify and safeguard a range of sites for industrial/employment activity and business use in the Local Policies Plan"*. Evidence Paper 3 – Economic Growth (Para 8.2) summarises **recommendation within the Council's Employment Land Evaluation Report (ELER) for "Monitoring the uptake and development of economic designations"**. As concluded by Evidence Paper 3, there is an overprovision of c. 107Ha with limited uptake on these zoned sites. When assessing the future development of the subject

site, this demonstrates a distinct oversupply of employment land which contains several legacy locations yet to come forward/have no committed proposals. This must be re-evaluated in order to ensure lands can be developed in accordance with the greatest local need i.e housing.

- 2.3 Para 9.4 of Evidence Paper 3 – Economic Growth makes reference to Metropolitan Newtownabbey being the largest settlement within the Borough and states that, ***"Metropolitan Newtownabbey has adequate supplies of employment land yet to be developed"***. This equates to c. 130Ha yet to be brought forward for economic/employment uses. The majority of these lands exist at Global Point Business Park (82Ha).
- 2.4 Within the ELER, Storage & Distribution is noted as the sector with the largest demand. When considering these employment space demands (prepared by Webb Advisory), it is speculated that demands estimates for employment uses for the Borough will be between 76,000m²-318,000m² (7.6-31.8Ha) could be required by 2030. Taking into consideration overall development of employment sites (inclusive of car parking & other provision), these figures are upwardly projected by between 25-50%. When using the extremes of both sets of figures, this represents an estimated total requirement of 47.7Ha.
- 2.5 Of the top three tier settlements proposed for SELs (Metropolitan Newtownabbey, Antrim and Ballyclare), Metropolitan Newtownabbey possess the highest level of employment lands (c. 130.75Ha) with the combined total of Antrim and Ballyclare totalling 31.38Ha. This, combined by the figures stated above, demonstrates near capacity within Metropolitan Newtownabbey alone to cater for the Storage & Distribution demands. The argument is further bolstered that there is a distinct overprovision of lands for employment use, specifically within Metropolitan Newtownabbey. This must be considered and the lands afforded a degree of flexibility for future development or alternatives uses, on sites which are yet to come forward for development from the legacy plans.
- 2.6 More recently (July 2019) a Proposal of Application Notice (LA03/2019/0567/PAN) for ***"Proposed storage and distribution warehousing, internal roads, parking landscaping and associated site works"*** was deemed acceptable relating to a western portion of the zoned employment lands (MNY 07), adjacent to the Brett Martin Production Facility at Roughfort Road. This has been brought forward by Brett Martin Ltd./Ballinamallard Dev Ltd and is adjacent to their premises. We welcome this proposed development by an established business and would assert that re-zoning for residential development of c. 2.14Ha would not prejudice the wider potential zoning (i.e the remaining lands previously identified under BMAP for employment as an SEL). As identified above and within the Evidence Paper, significant portions of employment lands exist throughout the Borough in the form of existing and proposed SELs, with further opportunity for employment lands at a local level (Local Employment Sites).
- 2.7 We are of the opinion that housing offers a more appropriate response to the subject lands, given Park Road is primarily characterised by residential development. Established housing exists at Park Manor and The Poplars along with a pending planning application for 162no.

dwelling (LA03/2019/0667/F) to the south. We are of the opinion that the identified lands should be reassessed and zoned for residential development, in order to provide a better distinction between the proposed employment lands and the residential character of Park Road.

- 2.8 Drawing attention to lands south of the subject site which are zoned for residential use at Park Road, and with respect to Draft BMAP, the re-zoning of employment lands at this location has previously been heard to be acceptable. As part of the legacy LDP process, 'Objection 766' concerning the northern most portion of now residential zoning MNY 07 was heard. The PAC agreed with this objection and reference to Policy HOU 1, that housing on this site would not offend the logical limit of the settlement and should be considered so that revised HGI figures could be met. These lands were subsequently included within the aforementioned residential zoning and it was conceded that this would not result in an extension westwards of the urban area. We are of the opinion that similar circumstances dictate and consideration of this previous determination should extend to our clients lands.
- 2.9 A preliminary design concept has been included at Annex 2, identifying how the lands can be read in conjunction with MNY 04/26. They form a natural continuation of this proposed residential development at Park Road. The layout is capable of addressing both Antrim Road and Park Road through double fronted dwellings, which would produce a quality streetscape and promote positive placemaking. Preliminary access surveys have identified a suitable access point onto Park Road, serving the development in its entirety and ensuring road user safety at Park Road would not be negatively impacted upon. Initial viability studies have shown the site is capable of yielding c. 43no dwellings (c. 20dph). This would continue to ensure an adequate and available supply of appropriate housing throughout the Borough, which we will now expand upon.

SP 4: Homes

- 2.10 We would consider this policy to be unsound and that the rezoning of the subject lands at the junction of Antrim Road and Park Road (c. 2.14Ha) would help address the following concerns relating to such.
- 2.11 The growth allocation figures for the Borough have been identified as 9,750no. homes for the plan period of 2015-2030. Of this allocation, 3,900no. dwellings (40%) have been allocated for Metropolitan Newtownabbey. We are of the opinion that this housing allocation is an under estimation from what will be required for the plan period in Metropolitan Newtownabbey evidenced by preceding years build rates. A revised figure of 11,050no. homes has been projected forward to 2032, with the Metropolitan Newtownabbey allocation of 40% remaining which equates to 4,420no. units. This justification will be expanded upon in later paragraphs.
- 2.12 At POP stage of the LDP production, the overall housing growth figure incorporated a 5-Year land supply to 2035 which equated to a total housing growth figure of 13,000no. dwellings. We **note that at Paragraph 5.3 of their POP response, DfI stated "The SPPS provision relating to**

the maintenance of a 5-year supply of land for housing is to ensure that, within the lifetime of the plan, there is always a 5-year supply of genuinely deliverable housing land available. Council should ensure that the plan incorporates monitoring provisions to ensure that this supply is maintained, and the plan reviewed, should monitoring conclude that the housing **supply falls below this threshold**". To this end, as identified on Page 77 of the POP Consultation Report, the Council have revised the housing growth figure for the LDP period. Furthermore, Page 78 of the Consultation report states that the Council undertakes an annual housing monitor to measure the uptake and remaining supply of housing land within the Borough. This ensures continued flexibility throughout the LDP period, along with a sustainable and managed release of housing land.

- 2.13 Whilst **we appreciate the Council's methodology, we note that according to the Council's** revised Timetable (July 2018), the Plan is not due to be adopted until Q4 2023/24. Given that the publication of the Draft Plan Strategy and consultation period is currently 9 to 12 months behind schedule, we feel it is reasonable to presume that the full adoption of the Plan will be delayed past the March 2024 timeframe and this may result in less than 5 years between the adoption of the Plan and the end of the Plan period. Given these delays, and therefore the limited time for review and amendment of the plan prior to 2030, we believe it would be appropriate to allow a housing growth figure to 2032 to allow for adequate flexibility and time to review in the event of a newly amended timetable. This would increase the overall housing growth figure to 11,050no. units (10,200no. for settlements & 850no. for countryside dwellings).

SP 4.3 – The allocation of housing growth to each settlement and the countryside, is based on the **Spatial Growth Strategy for the Borough...**

Test: P1 – Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?

- 2.14 While we agree with the 40% allocation and evidence base for development of new housing in Metropolitan Newtownabbey, this total figure must be updated in line with the revised total housing growth figure previously stated. For 11,050no. units, this would increase to 4,420no. units for the revised period to 2032. Table 12 of Evidence Paper 6 – Housing indicates the total number of committed residential units is 4,572no. However this is inclusion of uncommitted zonings which may not be available or achievable, particularly if they have been zoned for a long period of time. The evidence to support this has not sufficiently reviewed the remaining yield within each settlement.
- 2.15 In order to provide a choice of housing for people in socially balanced and inclusive communities across the Borough, the Council will apply a presumption in favour of the development of new homes provided applications meet the requirements of Policy SP 4 and other relevant policies and provisions of the LDP. As identified at Annex 2, an indicative residential layout has been produced for these lands and has identified they are capable of

yielding c. 43no. dwellings. These lands demonstrate strong potential to be built as an extension of the residential zoning to the south, through sensitive siting and design layout to accord in terms of density and layout. Their location and setting within the Borough will provide homes of a sustainable fashion, with good transport links and in an attractive setting.

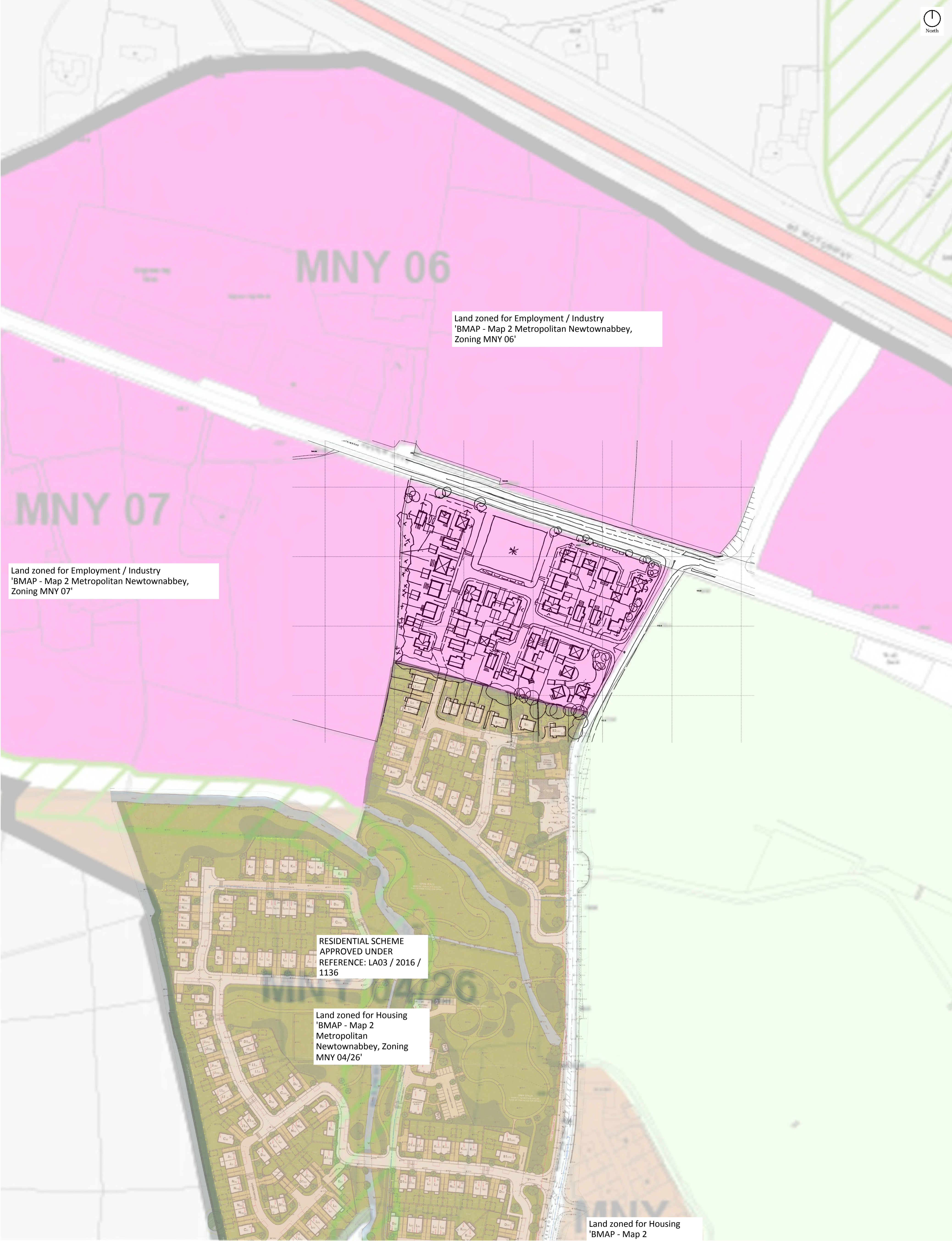
3.0 Conclusion

3.1 The DPS forms a key part of the overall LDP process, providing a policy framework to guide development and encourage investment throughout the defined plan period. The DPS will positively assist with the formation of the Local Policies Plan, the next key stage of the LDP 2030 process which will focus on site specifics/boundaries. Given the adjacent context of proposed residential development to the south of the subject lands (Ref: LA03/2019/0667/F) at Park Road, the most natural and viable use for future development of these lands would be for residential development. This would form a legible extension of the MNY 04/026 housing designation.

3.2 We are of the opinion that policies within the DPS to maintain legacy employment zonings as well as designating a further 2no. SELs within the borough will ensure an adequate and available, if not excessive, supply of employment lands in line with the generous supply required by the SPPS. The rezoning of c. 2.14Ha for housing will not stymie any unexpected future growth of employment uses and would instead assist in addressing the housing policies/allocations for Metropolitan Newtownabbey which we consider to be unsound for the reasons set out above.

3.3 This representation sets out the views of Vaughan Homes in respect of the policies contained with the Draft Plan Strategy. Accordingly, we request that these comments are given favourable consideration by the Council in relation to the adoption of the Plan Strategy. Aware that site specific representation will generally be reserved until the Local Policies Plan, we respectfully reserve the right to make further representations throughout the course of the LDP 2030 process.

Annex 1
Site Location Map



Land zoned for Employment / Industry
'BMAP - Map 2 Metropolitan Newtownabbey,
Zoning MNY 07'

Land zoned for Employment / Industry
'BMAP - Map 2 Metropolitan Newtownabbey,
Zoning MNY 06'

RESIDENTIAL SCHEME
APPROVED UNDER
REFERENCE: LA03 / 2016 /
1136

Land zoned for Housing
'BMAP - Map 2
Metropolitan
Newtownabbey, Zoning
MNY 04/26'

Land zoned for Housing
'BMAP - Map 2
Metropolitan
Newtownabbey, Zoning
MNY 02/47'

Annex 2
Indicative Site Layout

PARK ROAD

ANTRIM

VAUGHAN HOMES

ILLUSTRATIVE CONCEPT LAYOUT

Drawn: AUG 2019 | SV

Scale: 1:500 @ A2

Ref: F4765-050-03-001

SUBJECT TO PLANNING PERMISSION, ALL

RELEVANT SURVEYS, AND ALL OTHER

STATUTORY APPROVALS

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DEVELOPMENT SCHEDULE:

43 NO UNITS

20 NO SEMI DETACHED &
23 NO DETACHED

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