
Consultation Period

Antrim and Newtownabbey Borough Council has published its draft Plan Strategy, the first formal stage of the new Local Development Plan 2030, for public consultation.

The draft Plan Strategy is the first of two documents, which comprise the Local Development Plan 2030. It has been developed following extensive engagement with the public, stakeholders and our elected Members, including the publication of our Preferred Options Paper.

The draft Plan Strategy sets out how our Borough will grow and change up to the year 2030. It puts forward our Plan Vision for the future. It also contains a Spatial Growth Strategy indicating at a strategic level where growth should go in the Borough. It also sets out a range of Strategic Policies and Detailed Management Policies, which together will guide future planning decisions.

The draft Plan Strategy is published for formal public consultation over an 8-week period and the Council is inviting the submissions of representations, beginning on **Friday 26 July and closing on Friday 20 September 2019 at 5pm.**

The submission of representations in relation to the Council's draft Plan Strategy provides an opportunity for the public to influence the policies and proposals for the future planning and development within Antrim and Newtownabbey.

Please note that representations received after the closing period will not be accepted and will be subsequently returned.

Published alongside the draft Plan Strategy are a range of assessments including Sustainability Appraisal (incorporating the Strategic Environmental Assessment), a draft Habitats Regulation Assessment and an Equality (Section 75) Screening and Rural Needs Impact Assessment Report. These assessments are also subject to public consultation during the formal public consultation period closing on Friday 20 September 2019 at 5pm.

Copies of the draft Plan Strategy and all supporting documents are available to view and download from our website at:

www.antrimandnewtownabbey.gov.uk/draftplanstrategy.

Copies of all documents are also available for inspection at the Council Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8.30am to 5pm. Hard copies of the draft Plan Strategy are also available upon request.

Soundness Testing

A key feature of Northern Ireland's new Planning System is 'Soundness' which requires the draft Plan Strategy document to be tested at Independent Examination (IE) in terms of content, conformity and the process by which it has been prepared. Derived from established practices in England and Wales, it is considered that 'Soundness' testing will provide a more effective basis for examining Local Development Plans and consequently contribute towards a shorter IE process.

The purpose of the IE is to determine if the draft Plan Strategy satisfies statutory requirements and is 'sound'. The presumption will be that the draft Plan Strategy is 'sound' unless it is shown to be otherwise as a result of evidence considered at the IE stage.

The tests of soundness are based upon three categories which relate to how the draft Plan Strategy has been produced, the alignment of the document with central government regional plans, policy and guidance and the coherence, consistency and effectiveness of the content of the draft Plan Strategy. The tests of soundness are set out below:

Procedural Tests	
P1	Has the DPD* been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
P2	Has the Council prepared its Preferred Options Paper and taken into account any representations made?
P3	Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?
P4	Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
Consistency Tests	
C1	Did the Council take account of the Regional Development Strategy?
C2	Did the Council take account of its Community Plan?
C3	Did the Council take account of policy and guidance issued by the Department?
C4	Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining Council's district?
Coherence and Effectiveness Tests	
CE1	The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross-boundary issues are relevant it is not in conflict with the DPDs of neighbouring Councils.

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.
*Development Plan Document (DPD) – Comprises of the draft Plan Strategy	

Further information on Soundness can be found in Development Plan Practice Notes published by the Department for Infrastructure (DfI). Of particular relevance is Practice Note 6 'Soundness' (Version 2) and Practice Note 9 'Submission and Handling of Representations', both are available to view at <https://www.infrastructure-ni.gov.uk/publications/development-plan-practice-notes>.

In addition, the Planning Appeals Commission has also produced guidance entitled 'Procedures for Independent Examination of Local Development Plans' available at <https://www.pacni.gov.uk/procedural-guides>.

Making a Representation

As the main purpose of the IE is to determine whether the Development Plan Document (DPD) is 'sound', any person(s) wishing to make a representation to any part of the Plan should do so on the grounds of soundness. Any representation proposing a change to the Plan must demonstrate why the document is not sound having regard to the tests of soundness. Every representation should say precisely how the Plan should be changed in order to achieve soundness and should be supported, succinctly, by all the evidence thought necessary to justify the proposed change. Once the public consultation period has closed, **there will be no further opportunity to submit information unless the Commissioner requests it.**

Where several people share a common view on how the draft Plan Strategy should be changed, we encourage you to co-operate with each other, pool resources and make a single representation, for example, a local community group.

Those who make representations to the draft Plan Strategy should state whether they wish to have their representation considered at IE in writing or as an oral hearing. Unless people specifically request an oral hearing, the Commission will proceed on the basis that you are content that your representation will be considered in writing. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orally or in written form.

Points to Remember:

- Representations will be made publicly available for inspection at the Council's Offices and online for counter-representations;
- Complete all relevant sections of the response form;
- Clearly state why you consider the draft Plan Strategy to be 'unsound', having regard to the soundness tests;
- There will be no further opportunity to submit information once the public consultation period closes unless the Commissioner requests it;
- We would encourage you to submit separate forms for each representation you wish to submit;
- Every representation should say precisely how the draft Plan Strategy should be changed in order to achieve soundness;
- Representations should be supported, succinctly, by all the evidence thought necessary to justify the proposed change; and
- Clearly, state whether you wish for your representation to be heard orally or in writing.

Submitting Your Representation

We recommend that you submit your representation via our on-line consultation hub, at www.antrimandnewtownabbey.gov.uk/consultations, as this is the most efficient way to make a representation.

However, you can make a representation by completing this form and returning to us by **5pm on Friday 20 September 2019** either by email or by post.

Representations received after the closing period will not be accepted and will be subsequently returned.

What Happens Next

When the consultation has closed, the Forward Planning Team will collate the representations received and as soon as reasonably practicable, publish these online for a further 8-week period of consultation to allow counter-objections to be made. The representations will also be available for public inspection during this period at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to 5pm.

Once this period of counter-representations has closed, the Forward Planning Team will collate the counter-representations and publish these online. They will also be made available for public inspection at the Council's Offices in Mossley Mill, Newtownabbey and Antrim Civic Centre, Antrim from Monday to Friday 8:30am to

5pm. The next anticipated step will be for the Council to contact the Department for Infrastructure to request an Independent Examination of the draft Plan Strategy.

Contact Us

For further assistance, please contact the Forward Planning Team at Mossley Mill, Newtownabbey:

By Post – Forward Planning Team

Mossley Mill

Carnmoney Road North, Newtownabbey

BT36 5QA

By Email – planning@antrimandnewtownabbey.gov.uk

By Telephone – 0300 123 6677

SECTION A – DATA PROTECTION AND CONSENT

Antrim and Newtownabbey Borough Council complies with the General Data Protection Regulation (GDPR) by producing a specific Local Development Plan Privacy Notice, which lets you know how we manage any personal information we receive from you. It contains the standards you can expect when we ask for, or hold, your personal information and an explanation of our information management security policy.

The Local Development Plan Privacy Notice can be found on our website at www.antrimandnewtownabbey.gov.uk/gdpr/planning-gdpr/.

Please note that when you make a representation (or counter-representation) to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the Council's website.

Copies of all representations will be provided to the DfI and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for Independent Examination. A Programme Officer will also have access to this information during the IE stages of the Plan preparation

DfI, the Programme Officer the Independent Examiner will, upon receipt, be responsible for the processing of your data in line with prevailing legislation.

1. 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.

You can contact the Council's Data Protection Officer via:

Post - Antrim Civic Centre, 50 Styles Way, Antrim BT41 2UB

Email - DPO@antrimandnewtownabbey.gov.uk

Phone - 028 9446 3113

SECTION B – YOUR DETAILS

2. 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?

If you are responding as an agent or representing an organisation you will be the main point of contact for your client/organisation.

(Please select only one item)

- ☐ Individual
☐ Organisation

☒ Agent

	Personal Details	Agent Details (If Applicable)
Title	Mr	Mr
First Name	Iain	Eamonn
Last Name	McCabe	Loughrey
Job Title (where relevant)		
Organisation (where relevant)		Inaltus Limited
Client Name (where relevant)	C/O Agent	
Address		15 Cleaver Park Belfast
Post Code		BT9 5HX
Telephone Number		07772947761
Email Address		eamonn@inaltus.com

SECTION C – REPRESENTATION

Your comments should be set out in full. This will help the Independent Examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.

3. To which part of the draft Plan Strategy does your representation relate?

i) Paragraph Number: _____7.6-7.15_____

ii) Policy Heading: _____Spatrial Growth Strategy and Homes_____

➤ Strategic Policy (SP) Paragraph Number: __ SP1.7, Table 1, SP.2.1, SP 2.2, Table 3, SP 3.2, SP 4.2_____

➤ Detailed Management Policy (DM) Paragraph Number: _____DM17.3_____

iii) Page Number in Document: _____134-143_____

iv) Proposal Map (if relevant state location): _____

4. Do you consider the draft Plan Strategy to be:

☐ 'Sound' (i.e. support)

☒ 'Unsound' (i.e. object)

5. If you consider the draft Plan Strategy to be '**SOUND**' and wish to support the draft Plan Strategy, please set out your comments below.

Not Applicable

(Continue on a separate sheet if necessary)

6. If you consider the draft Plan Strategy to be '**UN SOUND**' please identify which test(s) of soundness your representation relates to having regard to the

Department for Infrastructure's published Development Plan Practice Note 6 'Soundness' (Version 2).

Soundness Tests:

- ☐ **P1** - Has the DPD¹ been prepared in accordance with the Council's timetable and the Statement of Community Involvement?
- ☐ **P2** - Has the Council prepared its Preferred Options Paper and taken into account any representations made?
- ☐ **P3** - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?
- ☐ **P4** - Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?
- ☐ **C1** - Did the Council take account of the Regional Development Strategy.
- ☐ **C2** - Did the Council take account of its Community Plan?
- ☐ **C3** - Did the Council take account of policy and guidance issued by the Department?
- ☒ **C4** - Has the DPD had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining Council's district?
- ☒ **CE1** - Does the DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross-boundary issues are relevant it is not in conflict with the DPD's of neighbouring Councils?
- ☒ **CE2** - Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?
- ☐ **CE3** - Are there clear mechanisms for implementation and monitoring?
- ☒ **CE4** - Is it reasonably flexible to enable it to deal with changing circumstances?

Details

¹ Development Plan Document (DPD) – Comprises of the draft Plan Strategy

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

Please Note: Your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **This representation will be considered during the IE and here will be no further opportunity to submit information unless the Commissioner requests it.**

See Attached Response and Annex A.

(Continue on a separate sheet if necessary)



Modifications

8. If you consider the draft Plan Strategy to be '**UNSOUND**', 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.

See Attached Response and Annex A.

(Continue on a separate sheet if necessary)



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

Please Note: Unless you specifically request an oral hearing, the Commission will proceed on the basis that you are content to your representations considered in written form only. The Commissioner will give every representation the same careful consideration regardless of whether the person who made it is heard orally or not.

Please select only one item;

☐ Written Representation

☒ Oral Hearing

Signature:

Eamonn Loughrey

Date:

20 September 2019

Thank you for your response.

Antrim and Newtownabbey Borough Council Local Development Plan

Response to Draft Plan Strategy

POP Ref: POP/PR/024
Ref: 16/11 (5)(PS)
Client: Iain McCabe

1. We make this submission on behalf of Mr Iain McCabe. Mr McCabe owns a 33 acre (13.3 ha) infill site abutting the old Antrim Settlement Limit as defined in the Antrim Area Plan 1984-2001. These lands are located at the corner of Stiles Way and Steeple Road, Antrim. It is an obvious infill site, with existing residential development to the western boundary (Kintyre and Glencriag) and to the eastern boundary and along Steeple Road towards the Antrim Area Hospital (Bush Manor) with excellent existing infrastructure/access.
2. Mr McCabe's principal concern relates to housing and the need for a proper Housing Need figure to be determined and for a appropriate housing allocation to help grow Antrim over the Plan period.
3. To this end we append a Working Paper on Plan Strategy Housing Matters at **Annex A**. For ease of reference, we also include at **Annex B** the POP submission we made on Mr McCabe's behalf. Again the main points raised in our POP submission are consistent with our current case. We have elaborated on the case and addressed matters we are concerned with in the Council's approach.
4. In summary the case is that:
 - a. There needs to be a change to the Plan Objectives;
 - b. The hierarchy needs to reflect Antrim's role in the Borough;
 - c. The Housing Need figures need to be objectively reassessed;
 - d. The allocation of housing needs to reflect Antrim's important role in the Borough;

- e. The lands allocated in existing settlements need to be critically reviewed under the LPP in the context of deliverability over the Plan period;
- f. Wording in the Plan Strategy needs to avoid prejudicing future aspects of the LDP process.

Details

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

***Please Note:** Your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. This representation will be considered during the IE and here will be no further opportunity to submit information unless the Commissioner requests it.*

5. The Plan is unsound because:-
 - C4 The Plan Strategy has not had proper regard to the Council’s Economic Strategy insofar as it affects housing need; or properly considered the effect of Belfast’s Draft Plan Strategy in so far as it affects housing need;
 - CE1 The Council has not set out a Strategy from which all policies logically flow as the Strategy does not include robust Housing Need calculations;
 - CE2 The Strategy, policies and allocations are subdued in respect of housing and have not considered the relevant alternatives and material considerations highlighted in **Annex A** and are not founded on a robust evidence base;
 - CE4 The Plan Strategy is not reasonably flexible to deal with changing circumstances. The Plan Strategy does not reflect the potential that Antrim is under provided for in the Housing Needs allocation and other settlements have undue influence on the Housing Needs calculation and allocations.

6. As a general comment the presentation of the Draft Plan Strategy is unclear and merges policies with supporting text. The document should be re-worked to set out clearly what the Plan Visions, Strategies, Policies and Allocations are. Normally such information is clearly set out with specific policies contained in policy boxes within the documents and supporting text is set out clearly and presented differently to distinguish it from policy. This approach would be helpful for readers and users of the Plan Strategy.

7. Specifically Strategic Objective 8 should be re-worded to state that it should “*Ensure a ~~sufficient~~ generous supply of land for new homes, provide a diverse choice of housing and strengthen community cohesion*”. Our Working Paper at **Annex A** shows how the Council area is under performing in its delivery of housing and will not at current rates provide even the rHGs of the RDS by 2025. The Council must act now to ensure adequate housing is provided and this requires facilitating a significant boost to housing supply. The objective can set the framework for this by making provision for a generous supply of housing land.
8. We note that the text for the Spatial Growth Strategy includes Antrim alongside Metropolitan Newtownabbey as a top tier settlement town in category (a). However, Table 1 appears to distinguish between the two settlements areas. This difference is followed through into the housing allocations. Table 1 should include the two settlements in the same rows to give clarity that both Metropolitan Newtownabbey and Antrim are tier 1 settlements and of the same status in the Plan. There is no guidance in the RDS as to the role and function of Newtownabbey and there is no justification to include it in a higher tier of settlement above Antrim, which is clearly defined in the RDS as Main Hub. In order for Antrim to maintain this important status, it needs to be confirm as a tier 1 town in the Plan Strategy.
9. The consequence for Antrim if it is classed as a tier 2 town is that it could lose out to Newtownabbey for investment.
10. Also and perhaps more importantly, looking outside the Borough, it would be quite clear that in Mid and East Antrim Borough Council area, Ballymena will be the Borough town and will be a tier 1 settlement in that Plan Strategy. As such, Antrim’s ability to compete with towns such as Ballymena will be undermined by its own Plan Strategy in this case, which is the result of the Council area having a Metropolitan Area when other Councils do not. Antrim should not be prejudiced in this way.
11. The Map at Figure 3 needs to be amended to reflect the changes in the settlement hierarchy to give Antrim and Newtownabbey equal status.
12. Consistent with above, we would endorse the Council Strategy in seeking to create 9,000 jobs in the Borough by 2030. We therefore support Strategic Policy (SP) 2.1 and the focus on Antrim in para SP2.2 that supports our proposed settlement strategy amendments for

Antrim. Similarly we welcome SP Table 3 that identifies 8 SELs in Antrim. It is notable that this is two more than the 6 SELs identified for Newtownabbey.

13. We further note that Antrim and Newtownabbey's Abbey Centre are both considered as large town centres in Table 4. We would endorse this and consider it to reinforce the case to include Antrim as a tier 1 town.
14. On the basis of the level of retailing, employment and services Antrim and Newtownabbey should be considered equal in the Plan Strategy and equal in terms of ability to accommodate growth.
15. We object to SP 4.2 in that that the background evidence as set out in detail in our Working Paper at **Annex A** does not support the provision of 9,750 dwellings. This level of housing is too low. Whilst it is acknowledged that SP 4.2 includes the words "at least", the reality is that to have additional lands zoned in Antrim beyond the minimal allowance indicated in the Plan Strategy will be unlikely to come forward. Planning Officers and Councillors will be very reluctant to exceed the figures stated in the Plan Strategy. Moreover the Plan Strategy does not include any policy provision for additional housing beyond the allocations stated. If there was to be a proper recognition that the 9750 figure could be exceeded, policy should explicitly set out when and how this would occur. In the absence of such given our **Annex A** evidence, it is vitally important that a full objective calculation of Housing Need is set out in the Plan Strategy. The policy should also include the criteria upon which settlements can exceed their housing allocation.
16. The Council's case appears to be that the Housing Needs figures can be substantially more than met through existing zonings in legacy Plans. If that is the case, the exercise of undertaking the Housing Need calculation is nothing more than an academic exercise. That cannot be allowed to be the case. We look forward to the Council's view on this matter.
17. As set out in **Annex A** the Housing Need figure should be at least 15,600 and SP 4.2 should be updated to substitute 9,750 with 15,600. Table 6 should be amended as set out below.

Location	Growth Allocation Option	% Growth
Metropolitan Newtownabbey	5304	34%
Antrim	5304	34%
Ballyclare	1248	8%
Crumlin	1248	8%
Randalstown	780	5%
Elsewhere	1092	7%
Countryside	624	4%
Total	15600	100%

18. The supporting text, such as that at para 7.6-7.10 should be amended to reflect the figures above and our approach set out at **Annex A**.

19. Similarly para 7.14 should be amended to recognise that Antrim will need to have an increased release of suitably located housing land. The Council's approach to housing land supply as set out in our **Annex A** is insufficient to confidently and compellingly demonstrate that housing land in Antrim is developable and deliverable over the Plan period. It is highly prejudicial for the draft Plan Strategy to make statements such as that made in paragraph 7.14. It undermines the LDP process and has potential to frustrate and deter future public consultation exercises. Comments about the likely outcome of what is clearly a Local Policies Plan matter should be kept out of the Plan Strategy document.

Modifications

If you consider the draft Plan Strategy to be '**UNSOUND**', 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.

20. As set out above the following changes should be made to the Draft Plan Strategy:

- a. Strategic Objective 8 should provide a generous supply of housing land;
- b. Categorise Antrim as a Tier 1 Settlement in Table 1;
- c. Amend SP 4.2 to allow for a minimum of 15,600 units;

- d. Amend Table 6 to redistribute 15,600 units and allow 5,304 units in Antrim;
- e. Amend para 7.14 to recognise Antrim as a location requiring settlement boundary expansion;
- f. Delete any references that may prejudice the outcome of the Local Policies Plan process.

Other Matters

- 21. We would request that the Council give consideration to inclusion of our client's lands in Antrim. Maps of the lands are included in **Annex B**.

Annexes

- A. Working Paper on Plan Strategy Housing Matters
- B. POP Submission (including site maps, Working Paper on Housing Matters and Working Paper on Industry and Employment Matters)

Annex A

Annex A - Working Paper on Plan Strategy Housing Matters

Introduction

1. This paper builds upon our Working Paper submitted in respect of the Preferred Options Paper. We append our POP Submission and Working Papers at **Annex B** and therefore do not repeat it here. Instead we update the key components of it having regard to the Council's latest evidence as set out in Evidence Paper 1 Population (EP 1) and Evidence Paper 6 Housing (EP 6).

Revised Housing Growth Indicators

2. We have nothing further to add to our comments made in the POP.

The Evidence Paper

3. The Council's Evidence Paper 1 Population (EP 1) continues to confirm that the population of the Council area grew significantly more than the Northern Ireland average between 1971 and 2011 (+37% v 17.9%) (Table 2). This is consistent with the attraction of the Council area as a place to live in close proximity to Belfast and having regard to the strong transport network etc. Every decade since 1971 (except 81-91) the Council area has exceeded the NI growth average.
4. Between 2015 and 2017 the population has increased by 1230 people (EP 1 Table 1). That averages at 615 people/year. It would equate to a 15 year population growth of 9,225. EP 1 Table 25 suggests that the population will only grow by 4306 between 2017 and 2030. While unhelpfully this data does not in fact reflect the Plan period of 2015-2030, it can be noted using the previous information that the population will grow by 5,536 over the Plan period (a growth of 369 people per year). Such a figure appears inconsistent with the actual initial 2 years growth of 615 people/year between 2015-2017.

Migration

5. It is unclear why the figures in EP 1 and the previous POP EP diverge on this issue.

6. The POP EP Meeting the Needs of Society provided the following figures:

Page 16	2005-2015	Net Migration = +984
Page 40	2015-2030	Net Migration = -2411
Total	2005-2030	Net Migration = -1427

7. EP 1 now provides the following figures:

Page 7	2005-2017	Net Migration = +1126
Page 26	2018-2030	Net Migration = -858
Total	2005-2030	Net Migration = +270

8. This shows that over the same total timeframe the Council's estimates for migration have swung from an estimate of -1427 people between 2005-2030 to +270 over the same period. That is a swing of +1697. In our POP response we observed that Lisburn was been estimated to have a large inward migration and given the similar geographical locations and indeed the better strategic accessibility of ANBC, it remains unclear why the Council would be predicting a net reduction in migration levels.
9. Moreover, it would be our case that the Council should be planning to increase migration levels into the Council area to achieve the jobs growth that it is seeking.
10. EP 1 Table 5 again confirms that the average household size is predicted to decrease from 2.50 in 2016 to 2.41 in 2030 and that the number of households is predicted to increase by 4614. It is unclear how these figures reflect the rHGI figures provided by the DRD which contends that one of the reasons for the dramatic reduction in rHGIs is caused by higher average household sizes. EP 1 Table 5 confirms that average household size in the Council area is below the expected NI average in 2030.

What is the Housing Need in the Council Area?

11. We recognise that the Council is promoting a Housing Need figure that exceeds the rHGI figures even when rolled forward on a pro-rata basis. While that is welcomed, we are disappointed that the Council have amended downwards their Housing Need estimate from the Preferred Option in the POP. They appear to have done this at the request of

DfI who stated that the five year housing supply should not be built into the Housing Need figure.

12. The Council included this allowance on the realistic recognition that there is a need for a provision of 5 years housing land supply at the end of the Plan period. Despite the RDS confirming that the HGIs are not a cap on housing provision, it seems the DfI are seeking to unrealistically constrain the Council's ability to properly plan and allow for growth. This Plan Strategy is only being consulted upon in 2019, and the Plan Period is 2015-2030. This illustrates that the Plan is already behind schedule and given it will be probably around 2022 before the full Plan is adopted, merely demonstrates the prudence the Council adopted in including an allowance for beyond the Plan period. This is a materially important consideration when towns such as Crumlin have very little available housing land and have not had an up to date plan for almost 20 years.

13. The SPPS para 6.140 states, *"A 'plan, monitor and manage' approach is necessary to ensure that, as a minimum, a 5 years supply of land for housing is maintained"*. The Council's original approach that included an allowance beyond the Plan period for 5 years is vital to ensure that the 5 year supply of housing is maintained. There are three very good reasons for this:
 - a. If the housing need estimate is correct and all lands are taken up by 2030, the chances of the Council having a new Plan in place in 2030, based on past and current evidence is that it will not be replaced in time;
 - b. If the Council's supply of housing is underestimated by way of the number of total houses allowed for there will be shortage of supply towards the end of the Plan period and supply will run out;
 - c. If the Council's allocation is located in too few sites which are of a strategic nature or the ability of house builders to deliver the required allocation is prevented because of long lead-in times or provision of infrastructure or the limited capacity of house builders to build sufficient homes quickly enough the provision of new homes will not meet demand.

14. As such the Council would be prudent in maintaining the extra allocation for the period beyond 2030. It would be a safety valve should either of the three scenarios occur. We consider it should be included.

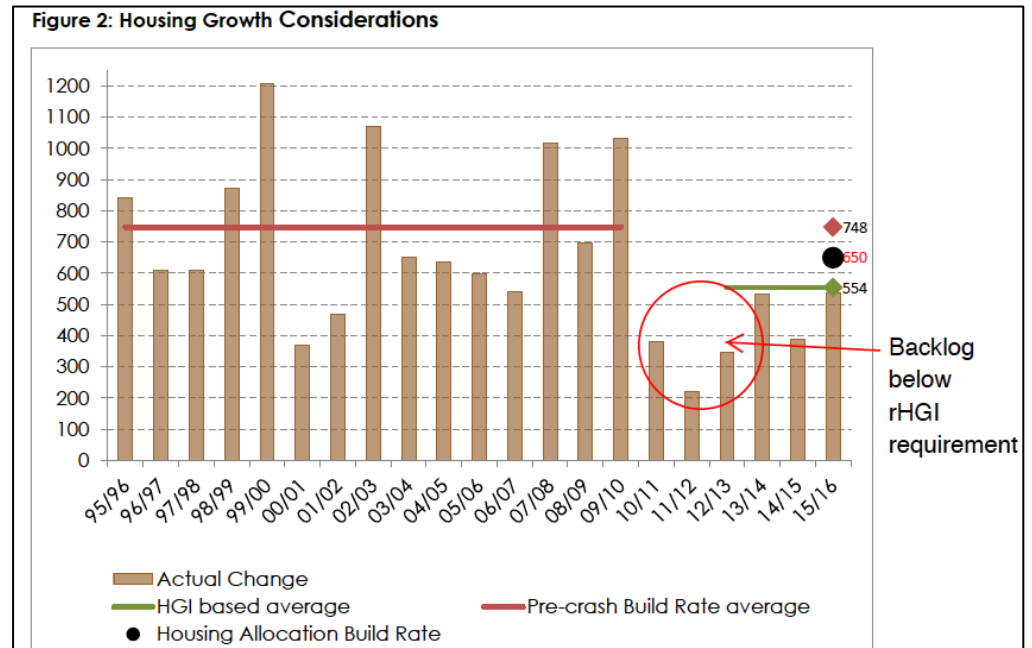
Approach to Determining the Housing Need

15. The approach to determining the Housing Need is guided by the RDS which notes (page 102) that *“Council’s will be able to use the Housing Growth Indicators as baselines or starting points which can subsequently be adjusted in light of the Housing Market Analysis for their area”*.
16. The RDS notes that the *“Northern Ireland Housing Executive is moving to a system of Housing Market Analysis that will aim not only to identify social housing need but also to provide a solid evidence base on which available land can be zoned for housing by planners. There is a growing consensus that there needs to be a broader approach to assessing housing need: one that aims to understand the workings of the wider housing market and that will look holistically at infrastructure, planning, the socio-economic context, regeneration needs, health, education etc”* [Emphasis Added].
17. The RDS notes that Housing Market Analysis will help develop a comprehensive evidence base to inform decisions about the policies required in housing strategies and the development of area plans.
18. The SPPS page 71-73 notes a range of factors to be considered in the process for allocating housing land. It includes the HGIs that are provided as an “estimate” and “guide” for new dwelling requirements. It notes a requirement to make a windfall allowance but notes that the scale of windfall allowances will vary from area to area, and an allowance can be made on past trends. It also notes that the Housing Needs Assessment/Housing Market Analysis provides an evidence base that must be taken into consideration in the allocation through the development plan, 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 traveller accommodation.

19. Whilst we acknowledge the Council note that identification of housing growth is not an “exact science”, it is unclear precisely what factors have been taken into account in reaching the Housing Need. The Council’s method of calculating the Housing Need for ANBC area seems to be to take a pro-rata approach to the rHGI and past housing building rates and applying them to the 2015-2030 period and splitting the difference.
20. If that is the case it fails to comply with the requirements of the SPPS and the need to take a holistic approach to determining an appropriate allocation for housing. It does not provide a full objective assessment of housing need and does not appear to take account of the following five factors:
 - a. Backlog;
 - b. The need of overzoning;
 - c. Social housing needs;
 - d. Migration trends;
 - e. Plan Strategy objectives.

Backlog

21. It is accepted that the rHGIs are a baseline, which means the required housing allocation will be above the rHGI. Of course, it is important to recognise that rHGI indicate that ACBC should, as a baseline, provide 7200 new houses between 2012 and 2025.
22. The Council’s evidence as illustrated below is that there is a backlog in providing the rHGIs requirement of 554 units per annum. The Council’s best figures are that total units completed between April 2012-March 2015 is 698 (POP EP Table 3.8) plus 1499 between 2015 and 2018 (EP 6 para 9.12). This gives a total units built of 2197. (N.B. this is an over-estimate as it includes rural replacement dwellings)



23. Using these figures the following is evident:

rHGI requirement 2012-2025	7200
ANBC Built 2012-2018	2197
ANBC Average Build rate	314
rHGI Requirement 2012-2018	3878
Backlog 2012-2018	1681

24. For the Council to provide the rHGI figures in 2025 it needs to make up the backlog of 1681 units on top of the six year requirement of 554 units x 6 = 3324. That is a total of 5005 units in the next 6 years. This equates to an annual build rate of 834 dwellings per year.

25. Where a Council is unlikely to provide its rHGIs (as is the case in ANBC) and it looks like there could be a significant short fall, it would be prudent and proactive to apply a buffer of additional housing provision of between 5% and 20% to encourage sufficient house builders to commence building on a sufficient number of sites around the ANBC area to ensure the housing requirements are in fact met.

26. Applying a:-

- a. 5% buffer above the rHGI annual requirement of 554 would add a further 28 units, when added to the backlog requirement would equate to 862 units each year, providing 5172 dwellings over the next 6 years. This scenario would provide 7369 units between 2012 and 2025;
 - b. a 20% buffer above the rHGI annual requirement of 554 would add a further 111 units, when added to the backlog requirement would equate to 945 units each year providing 5670 dwellings over the next 6 years. This scenario would provide 7867 units between 2012 and 2025.
27. Based on the current figures in order to achieve the rHGI baseline figures, the Council must significantly boost housing in the Council area.
28. Rolling these figures forward, the Council's average build rate from 2015-2018 is 500 units per annum (although again the Council's figures include replacement dwellings which are not a net increase, and so there is an element of double counting). It has currently about 1,500 units constructed in the current plan period. If the same levels are achieved in the next 12 years, the Council will achieve a further 6,000 dwellings, a total for the Plan period of 7,500. If the Council continue to allow the same lands to continue to be built out by the same builders, (given the fact that the Council considers there to already be an abundance of zoned land) then there is nothing to suggest that the Council will achieve its own stated requirement of 9750 units by 2030.
29. Again, this points to the need for an over provision to be included in the Housing Need calculation to allow alternative locations and alternative builders to contribute to the overall supply of housing in the Council area.
30. Based on the current figures and including a buffer of 5% to the 9750 would indicate a Housing Need of 10,238 units and a buffer of 20% would indicate an allocation of 11,700 units.
31. Our POP Working Paper estimated the need for 12,946 units in the ANBC based on passed house building trends. We would accept that some housing building continued to occur in 2008-2010 and the recession impacts occurred mostly in 2011-2013 as the Table above indicates. As such we would consider housing need baseline to be 11,700 with a 5

year supply at the end giving a total of 15,600. This will clear the existing backlog and provide a realistic baseline for future needs. However, these figures do not account for the other factors discussed below.

32. In essence if the Council simply provides the level of housing that base population growth predicts, it is failing in its requirement to provide sufficient housing to meet the other objectives of the Plan and to take the 'holistic' approach to housing needs identified in the RDS, where consideration needs to be given to the socio-economic context and potential migration issues.

Overzoning

33. The prescriptive approach to the rHGs and the Council pro-rata approach to its own analysis fails to provide any allowance for overzoning should in-fact the population and household growth figures prove to be under-estimates. In the same manner that the RDS HGI figures were found to be over-estimates because new Census data was available, there is also potential that when the 2021 Census is published the current population rates could be found to be inaccurate given they are based on data that is now 8 years old. The Council should have regard to the need for overzoning by a percentage of the final agreed housing need figures.
34. This approach would be wholly consistent with the tests of soundness, in that the Council are required to incorporate flexibility into the Draft Plan Strategy.

Social Housing Needs

35. The Council's EP 6 Housing discusses Social Housing Need. It acknowledges that the LDP process is the primary vehicle to facilitate any identified social housing need and that the LDP needs to take account of NIHE Housing Needs Assessment. The social housing need for the Plan period is 1800 units, with the 2018 social housing need being 1272 units. The EP states that the LDP will have to take this figure of need into account in its preparation. It is also noted that Crumlin displays "a significant localised" social housing need (179 units) compared to Ballyclare (34 units) and Randalstown (77 units) (EP 6 para 8.5).
36. It is wholly unclear how in determining the Housing Need figure of 9750, the Council have incorporated the requirement for 1800 units in the 9750 units required. The pro-rata

approach does not necessarily meet the social housing need requirements as the long term build rates would not have incorporated the equitable supply of social housing as there was no policy requirement for them to do so. Moreover, providing a pro rata figure could not be appropriate as it would not bring down the social housing need figures. Furthermore, the rHGI data does not mention incorporating social housing needs, and as this is a figure that clearly fluctuates over time due to changes in the economy and peoples personal circumstances, it is hard to see how it could have accurately been predicted in the rHGI prepared based on the 2011 Census.

37. EP 6 para 8.8 recognises that the *“in an effort to facilitate an increase in levels of delivery and therefore meet local needs, the Council acknowledges that the LDP process has a role to play in facilitating social housing need”*. The Council does this by seeking to introduce a policy requiring a percentage of new homes to be provided for affordable housing, however, again, it is unclear whether the global Housing Need figures include or exclude the estimates of social housing need as the Council’s methodology does not set this out.
38. To be clear, the Council’s role is to facilitate Housing Need and not to stymie it. We consider the Council needs to be very clear whether or not social housing requirement of 1800 units is included in the 9750 Housing Need calculation.

Migration Trends

39. Belfast has identified a need for 31,600 new homes to house an additional 66,000 people between 2020 and 2035 in the Council area as part of its Plan Strategy. That will increase the population of Belfast by 26,400 by 2030. Belfast also seeks to provide 46,000 additional jobs. This is clearly contrary to EP 1 Table 27 which predicts Belfast will have a total increase in population between 2018 and 2030 of 8,141. Obviously Belfast is planning to significantly boost its attractiveness to development and investors and as a place for people to live and work. Somewhat surprisingly, the Council’s EP 6 (para 4.13) states that *“no neighbouring Council’s growth strategy should have a negative impact on ANBC’s Strategy in terms of ... any necessary housing requirements”*.
40. As illustrated above the migration figures for ANBC are not consistent and it is clear that there is an issue with the figures. Notwithstanding this however, the Council needs to decide on its strategy to reflect the fact that it is ideally placed beside the key economic

engine of the region, being Belfast, and to be ready to benefit from the scale of growth and ambition shown by Belfast. ANBC will become an increasingly important location for the regional economy being the home of the main airport in the area and the location of major employment hubs. Its accessibility and proximity to Belfast means it is already a strong commuter base, and that is likely to continue. Peripheral areas of many large cities such as Dublin and London experience dramatic increases in demands for housing and increased house prices due to under supply. The ANBC Council needs to be satisfied that the ambitious growth being shown in Belfast does not result in increased migration to the ANBC area for housing for which the Plan Strategy has not allowed for.

Plan Objectives

41. The Plan Strategy seeks to provide 9,000 new jobs in the ANBC area (Plan Strategy para 5.8), however, the Housing Needs assessments and indeed the rHGI makes no allowance for a Plan Objective to provide for the needs and demands of people that seek to come into the Council area to live in order to fill the jobs that the Plan Strategy is trying to achieve.
42. The rHGIs are in no way linked to an increased economic boost caused by this ambitious Plan Strategy nor are the historic build rates. They cannot reflect the Council's future Economic Strategy.
43. The purpose of the LDP process is to holistically look at the various scenarios and objectives of the Plan Strategy and make adequate objective allowances for each scenario to occur. For example, if one third of the 9,000 new jobs was taken up by people that wanted to move into the area, to reduce commuting, be more sustainable and achieve a better work life balance, that would equate to 3,000 new households. No account has been made for this potential inward migration that results directly from the Council's Plan Strategy and its Economic Strategy.
44. Furthermore, the Council's (EP 3 Economic Growth para 7.3) predictions that employment levels would follow the NI trends and that *"Unemployment was forecast to reach a 10 year low in 2018, before increasing over the period to 2022, and then declining to the period to 2030"*, has not yet come to fruition. The latest figures (September 2019) for Northern Ireland show unemployment between May and July 2019 to be 2.8% which

is a record low in unemployment in NI. As such the Plan Strategy's reliance on NISRA predictions need to be treated with caution.

Why Does Accurate Housing Need Figures Matter?

45. The Council acknowledge that establishing a Housing Need allowance is a fundamental part of the Plan Strategy, however it is important to set out the reasons why and what happens if there is an under provision.

46. An example of the failure to provide adequate Housing Need figures can lead to increased people living in housing stress. The issue manifests itself in Crumlin. Crumlin has a severe under supply of housing land, has suffered from having an historic and out of date Area Plan, is an attractive location for people from Belfast to move to, is an attractive location for people that work in the International Airport, Randox and Nutts Corner etc to live, has an attractive town centre, has good schools, has large food shops and a modern leisure centre. In addition to these factors it is the only area in ANBC to be identified as displaying significant localised social housing need. The under provision of future housing provides greater potential for housing stress.

47. Beyond this example, landowners and house builders need to be encouraged and facilitated to provide for the ANBC housing needs. Failure to establish a realistic Housing Need figure can:
 - a. Undermine the LDP Strategy;
 - b. Undermine the Council's Economic Strategy;
 - c. Increase the cost of housing in the Borough;
 - d. Increase housing stress and social housing need in the Borough;
 - e. Widen the affordability gap in the Borough;
 - f. Increase rents in the private sector;
 - g. Force outward migration; and
 - h. Increase use of unsustainable transport modes with people travelling longer journeys to work given lack of locally affordable homes.

Summary on Housing Need

48. We acknowledge that the Council has increased its Housing Need estimates above the rHGI figures. However, based on the information presented in the various EPs it does not appear that the methodology employed has had regard to all relevant factors in order to reach a robust Housing Need figure for the area.
49. We would expect the Council to provide a variety of scenarios setting out how the rHGI baseline data should be uplifted to reflect the matters outlined above. Without doing this in a robust manner, the Plan Strategy cannot be considered to be sound.

Housing Allocation

50. The technical background to the Council's Housing Allocations is set out at EP 6. This applies the Housing Evaluation Framework set out in the RDS Table 3.2. The RDS notes that *"The allocation of housing growth to specific locations in a district is a matter for decision through the development plan process. In the allocation process due weight needs to be given to reinforcing the leading role of the hubs and the clusters of hubs. Another important step in this allocation process is making judgements to achieve a complementary urban/rural balance to meet the need for housing in the towns of the district and to meet the needs of the rural community living in smaller settlements and countryside"*.
51. EP 2 carries out the settlement evaluation which is summarised in EP 6. The assessment matrix employed is a subjective assessment and there is little to distinguish between Crumlin and Ballyclare. Both are in the same classification of settlements as both are Settlement Band E with populations between 5,000 and 10,000.
52. Both towns have primary and secondary schools, library, health centres, places of worship, they are each on a linked transport corridor with good connections to the main motorway network. If anything Crumlin is closer to the airport and main areas of employment at the Airport and Nutts Corner. Both are attractive places to live and have similar infrastructure capacities. Both have clear areas of expansion potential. The difference between the two areas is that they have been impacted in different ways by the legacy Area Plans. Crumlin has had its housing growth constrained by the lack of an up to date Area Plan which would have facilitated further housing growth, while

Ballyclare has benefited from having a more up to date Area Plan which has allowed housing to be built and planning applications to be granted. A review of Crumlin clearly shows that the vast majority of its housing land has now been built out. Crumlin has significant potential to grow and is ideally placed to accommodate people looking to leave west Belfast, Dunmurry and Lisburn for a more traditional town environment. Other than the scale of population, which is a result of the availability of housing land, there is little to distinguish Ballyclare ahead of Crumlin.

Countryside Contribution

53. The amount of countryside housing is a diminishing supply. There was a market bubble in the mid 2000s that saw housing on farms applied for by many farmers, however, since the introduction of PPS 21, houses on farms are only granted every 10 years. Alternatives such as infill opportunities are limited in number and when infills are developed there is no scope to add more. As such, the expectation that countryside dwellings will continue at the same constant pace is likely to be an over estimate. It would be more appropriate to allow for a declining allowance unless the Council intends to relax the policy restrictions for countryside homes.

Housing Allocations

54. A fair and equitable distribution of housing would treat Antrim and Newtownabbey and Ballyclare and Crumlin more evenly, to reflect the similar composition and status of the towns, and the fact that Crumlin has little available housing land left and the fact it has a significant need for new social housing. We set out below our Housing Need and Allocations.

Location	Growth Allocation Option	% Growth
Metropolitan Newtownabbey	5304	34%
Antrim	5304	34%
Ballyclare	1248	8%
Crumlin	1248	8%
Randalstown	780	5%
Elsewhere	1092	7%
Countryside	624	4%
Total	15600	100%

Housing Land Supply

55. Housing land supply is a matter that will be principally dealt with through the Local Policies Plan. However a number of points can be raised now given the evidence presented by the Council.
56. The Council are incorrect to suggest that the existing availability of land in settlements is adequate to provide in excess of the Housing Need figures. There is a need to look again at the functioning of the housing market to understand whether the Housing Need can be met in real terms.
57. The Council has not provided a housing trajectory and so has not had regard to deliverability of housing in the area. The Council has no regard to the requirements for infrastructure provision and the likelihood of this being provided and the cost implications this has for a developer. Ballyclare is the key example of this. One of the sites that the Council relies upon is zoning BE03/05 which has permission for 1538 units but has not yet started (2018). If a house builder built this land out at 50 units per year it would only yield 550 units between 2019 and the end of the Plan period in 2030. This site could take 30 years to complete at 50 units a year. Therefore instead of Ballyclare having an available housing supply of 2949 it will possibly only provide 1911 units before the end of the Plan period. This of course does not account for other restrictions to lands in the area. The Council need to be realistic about what lands are developable and deliverable.
58. The analysis of EP 6 Table 12 shows that of the sites with planning permission 4,584 have not in fact started. This contrasts to the 3982 that have started. The fact that lands have planning permission and are not started must be a concern and indicate that some lands may have a site constraint to delivery of the land, or there may be an unwilling landowner that does not wish to see the land developed. There could be a multitude of reasons why land identified by the Council will not yield housing.
59. For a Council that has a significant housing backlog and is going to struggle to reach the rHGI growth indicators before 2025, and a Council that has 1200 households in need of social housing accommodation, the fact that the Council undertakes such a basic and uncritical look at housing land is most surprising. The Council are obliged to be discerning

in its assessment of the availability of housing land and understand whether there is or is not a likelihood of lands coming forward.

Windfall Sites

60. The Council are entitled to have regard to windfall sites, however, it is not sufficient to carry out a mathematical calculation of passed trends to windfall and simply project this forward at a declining scale. The RDS indicates this could be an approach, but in small towns such as Crumlin a reality check is required to consider whether there is in fact any lands where windfall development could be accommodated. The Council's calculation that Crumlin has a windfall potential of 117 is larger than Ballyclare, which the Council consider to be a larger town generally, and it is significantly larger than the 60 in Randalstown.
61. The windfall calculation is also potentially skewed in Crumlin, where the Area Plan zoned lands has largely but been taken up, and any development has had to come forward through windfall sites. In Ballyclare, where zoned land is in abundance, there has been no need for developers to build out windfall lands.
62. In the absence of robust evidence on a site by site basis, the Council's reliance on extant sites that are not yet started; uncommitted zoning sites and windfall sites must be subject to detailed scrutiny.
63. The Council has made reference to its Strategic Urban Capacity Study, and whilst we have requested a copy of this it has only been provided in an inaccessible manner shortly before the end of the Consultation period and we reserve the opportunity to comment on this in due course. The lands that the Council have identified in this Study again needs to be the subject of scrutiny as part of the public consultation exercise. The fact that it is used in EP 6 and not provided to the public is a failure of the consultation process. The Council indicates that the lands included are cleared sites which in some cases includes open space. The lands do not appear to have been considered in terms of deliverability and accessibility from a traffic perspective.

Potential Consequence of Development of Existing Available Lands

64. An alternative way of considering land availability is to assess what impact occurs if all lands are developed.
65. If all Ballyclare housing lands were built out as identified in Table 12 it would create 3511 households x 2.4 people/household = 8461 people. This would increase the population of the town to 18,500 (+85%). Proportionately this is a concern and the Council should consider the ability of Ballyclare to accommodate a population of 18,500. The scale of the available housing land bears no relationship to the Council's estimates of Housing Need for Ballyclare. There is no market evidence that the Council can rely upon that suggests that there is a public demand for this scale of housing in Ballyclare. The change in Council area boundaries inadvertently pitches Crumlin against Ballyclare. This change should not be used to continue to frustrate the sustainable growth of Crumlin.
66. In Crumlin if the notional available 431 units were built this would provide about 1000 extra people living in the town. This is only 17%. If an increase of 2,256 people (+45%) was achieved this would be a significant contribution to sustaining local schools, churches, shops and services. It would be a proportionate increase over the next 15 years.
67. If 1248 houses were allocated to Crumlin for the Plan period plus 5 years this would equate to an entirely achievable delivery of 62 dwellings per year. Two or three house builders could comfortably achieve this level of delivery. Instead, the Council's current allowance of 350 units for the Plan period equates to 23 units per year. If this is accepted and the 50 units per year was delivered, Crumlin will run out of housing land in 7 years. This is not a sustainable approach to housing in Crumlin.

Conclusion

68. The Council needs to:
 - a. Consider migration and set out what the accurate estimates are for the Plan period;

- b. Review the Housing Needs calculation objectively and recognise that house building in the Borough needs a significant boost to ensure the rHGs are provided;
- c. Review the Housing Needs methodology which is unclear and needs to take account of a variety of factors;
- d. Review the Housing Needs calculation to fully and objectively:-
 - i. address the backlog;
 - ii. include an over zoning allowance;
 - iii. ensure social housing needs are incorporated into the calculation;
 - iv. address potential migration issues;
 - v. reflect the impact of the Council's Plan Strategy Objectives;
 - vi. reflect the impact of the Council's Economic Strategy;
- e. Review the housing allocation to reflect the important role of Crumlin and Antrim;
- f. Undertake a critical and robust review of the suggested housing land supply to determine what sites are developable and what deliverability is likely over the Plan period;
- g. Provide a more compelling and objective estimate of windfall allowances;
- h. Make available for full consultation and critical review the Strategic Urban Capacity Study.

69. The foregoing comments inform our views on the approaches to the housing issues set out in the draft Plan Strategy.

Antrim and Newtownabbey Local Development Plan 2030

Response to POP Paper

Ref: 16/11 (5)

Client: Iain McCabe

1. We make this submission on behalf of Mr Ian McCabe. Mr McCabe owns a 33acre (13.3 ha) infill site abutting the old Antrim settlement limit as defined the Antrim Area Plan 1984-2001. These lands are located at the corner of Stiles Way and Steeple Road, Antrim. It is an obvious infill site, with existing residential development to the western boundary (Kintyre and Glenraig) and to the eastern boundary and along Steeple Road towards the Antrim Area Hospital (Bush Manor) with excellent existing infrastructure/ access.
2. The lands owned by Mr McCabe are illustrated at **Annex A**. At an average dwelling per hectare rate of 15dph, these lands could support 200 dwellings in Antrim.

Q.9. Do you agree with our Plan Vision and Objectives?

3. We consider the objectives are not ambitious enough. The fifth objective should be changed as follows:
 - a. To provide a generous ~~sufficient~~ supply of land for mainstream and affordable housing and ensure a diverse choice of housing.

Q.10. Do you agree with our preferred option for our settlement hierarchy?

4. In respect of Antrim being identified as a Major Town/Main Hub we would agree with this as set out in **Option 2**.
5. This is consistent with Antrim's designation as a Main Hub in the RDS 2035 and its location on a Key Transport Corridor, and in very close proximity to the Belfast International Airport.

Q.39. Spatial Growth Strategy – Do you agree with our proposed spatial growth strategy?

6. We agree with the growth strategy insofar as it focuses core growth on the hub of Antrim building upon existing committed development allocations and strengthening its role as the primary location for growth and investment in accordance with the Regional Development Strategy.

Q.40. Determining the amount of housing growth – Do you agree with our Preferred Option of 13,000 dwellings required for growth?

7. We **disagree** with the Preferred Option of 13,000 dwellings (average of 650 per annum).
8. We do not consider the evidence base is supportive of such a limited number of dwellings for the area. We have included a Working Paper on Housing Matters (**Annex B**) and a Working Paper on Industry and Employment Matters (**Annex C**) that discusses these topics.
9. We consider significant more work is required to reach a realistic and robust housing growth figure. We consider the evidence base at present to be limited and overly pessimistic.
10. While we disagree with the approach to the four options presented in the POP for housing figures we find the data is not robust for the following reasons:

Option 1

11. This option fails to address the backlog of housing supply for the RDS rHGs. The Plan will run from 2015 to 2030. To provide the rHGI of 7,200 by 2025, the Plan needs to address the current backlog of housing. The Council are underperforming in ensuring a delivery of housing. By 2015, 1,662 housing should have been built (554 x 3), but only 698 were built. This is a backlog of 964. This leaves 6,502 units to be delivered between 2015 and 2025, an average of 650 units per annum to achieve the rHGI by 2025.

12. Adding this 6,502 to the extra requirement of 2,770 between 2025 and 2030 would require 9,272 units, plus a 5 year supply of 2,770 at the end of the plan period, would require 12,042 units to be provided, and not the 11,080 suggested by Option 1. This is shown below:

2012-2015 built	698
Residual between 2015 and 2025	6502
Annual Ave to Meet rHGI Need	650
2025-2030	2770
Total	9272
Plus 5	2770
Total	12042

Option 2

13. We provide no comments on Option 2 other than to note that, on the basis it is applying deep recession trends for 15-20 years into the future, it is simply not pragmatic and should not even be given consideration as a realistic option. To even consider it would make the Plan unsound.

Option 3

14. Option 3 is incorrect as it applies an annual building rate from 1995 to 2010 of 748. This implies that between those 15 years 11,220 dwellings were built. The figures should have excluded the years between 2008-2010 as the recession prevented any housing building during that period. As such the 11,220 dwellings built would have been over 13 years and not 15 years, equating to a build rate of 863 units per annum. Apply this to the 15 years of the Plan would suggest 12,946 dwellings, plus 5 years beyond of 4,315, would imply a housing allocation of 17,261, and not 14,960 as Option 3 suggests. This scale of housing would be realistic as it is based on longer term trends (especially as the timeline was from the end of the troubles to the end of the market peak giving a strong balance). It also includes flexibility (required for the Plan to be found sound) as, should the 3000+ homes in Ballyclare not come forward, it would still allow the Council to deliver 10,000 units or so over the Plan period. This would allow for additional housing to be built to support future migration of workers to support the Council's economic strategy.

95-10 built	748
15 year total	11220
13 year ave	863
Plan period (15 years)	12946
Plus 5	4315
Total	17261

Option 4

15. Option 4 compounds the two errors highlighted in Options 1 and 3 in that it applies an average of build rates that do not address the backlog and do not discount the recession years. It should in fact take the average between 698 and 863 which is 780.5, and over a 15 year Plan period would require 11,708 units, plus a further 5 years of 3,903, equating to 15,611 units.

Option 1	863
Option 2	698
Average	781
Plan period (15 Years)	11708
Plus 5	3903
Total	15611

16. As such the Council's preferred option would be 15,611 units rather than 13,000 units.
17. In general, we consider the housing allocations do not have any correlation to the Council's economic growth strategy and as we set out in the Housing Paper (**Annex B**), in relying upon the rHGs as a guide the Council are being overly pessimistic.
18. In taking zoned land into account the Council needs to be confident of its ability to address the backlog of housing and understand lead-in times, viability and deliverability of housing land in the area. For example, housing land in Ballyclare is reliant on a bypass that has not been funded in over 20 years and it would be important that a buffer supply of housing is included in the allocation to act as a contingency should these lands fail to come forward.
19. At present the housing allocations fail the test of soundness as they are not based on robust evidence and are not realistic and have not considered appropriate alternative scenarios.

20. We would be keen to have discussions with the Council on the approach to reach a more robust housing allocation, based on up to date and reliable evidence.

Q.41. Allocation of Housing Growth – Do you agree with our preferred allocation of housing growth options, which consolidate the growth planned in Metropolitan Newtownabbey and focuses growth in the selected towns and villages.

21. This question excludes specific reference to Antrim, which we assume is an oversight. The POP figures imply an allocation of 3,500 units to Antrim, but with an existing notional supply of 3,509, this suggests there is no need for additional land. This is plainly not correct and not sustainable. It would be contrary to the RDS as it would undermine Antrim's role as a main hub (see RDS SFG 12 page 72). Antrim's allocation must increase by an increase in the global housing allocation and be given a greater share of the global allocation reflecting its main hub status.
22. The scale of distribution and the actual allocation figure is a matter of objection. Based on our Option 3 allocation above the distribution of supply would be as set out in the Table below.

	Growth Allocation Option	Existing Supply (01/04/2015)	Balance of Allocation and Supply
Metropolitan Newtownabbey	6041	4434	1607
Antrim	5178	3509	1669
Ballyclare	1208	3503	-2295
Crumlin	1208	404	804
Randalstown	1208	560	648
Elsewhere	1553	1493	60
Countryside	863	250	613
Total	17261	14153	3108

23. We again dispute the availability of lands in the settlements as a thorough assessment of deliverability of all housing lands has not taken place, that would look at build rates, lead in times and viability. The analysis above is only provided for illustration and consistency with the Council approach.

24. The analysis shows that, as Ballyclare already has an abundant supply of housing land (that is already approved and zoned) there is no requirement for any further allocations in the town.

Q.42. Existing housing commitments – Do you agree that unimplemented housing zonings in the BMAP and AAP should be carried forward in to our new local development plan?

25. Any zonings that do not have planning permission should be reviewed in accordance with our comments above about deliverability to determine whether they are likely to contribute to housing development over the Plan period. At present the evidence is not sufficient to decide which allocations are deliverable. Certainly, in Ballyclare there are serious questions over the deliverability of lands, that require significant infrastructural works that has not yet transpired.

Other Matters

26. We would request that the Council give consideration to inclusion of these lands within the settlement of Antrim to be zoned for housing development.

Annexes

- A. Site Maps (X 3)
- B. Working Paper on Housing Matters
- C. Working Paper on Industry and Employment Matters





Land & Property Services.
THE LAND REGISTRY

Date: 05 Jan 2016
County: Antrim
Folio: AN13423
Scale: 1:2500
Our Ref: 2015/720913
Your Ref: MC12020014
Map Ref(s): 09609SE2,09609SE4,09610SW,
09613NE2,09614NW1,09614NW2
Sheet 1 of 1

Key to folio labels:
a - AN13423

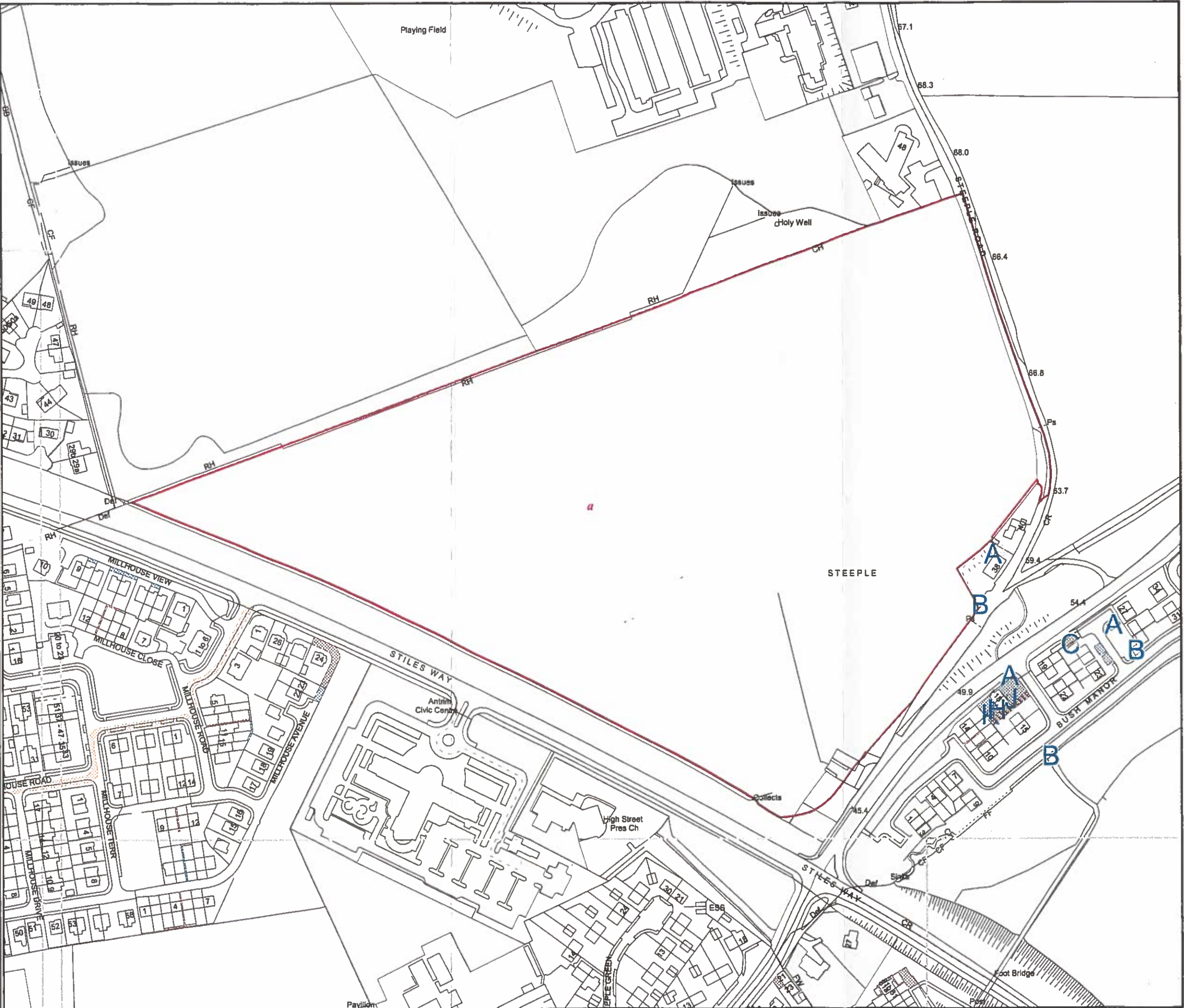
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This map has been prepared using the largest scale Land Registry map available for the area. Any future Deed map should be based on the largest scale OS Irish Grid Plan available for the area. N.B. Folio boundaries are not conclusive (unless so described on the folio). See 994 of the Land Registration Act (NI) 1970. Where there is any doubt concerning boundaries, the original instrument or Document should be inspected.

This copy map shows the location of the lands comprised in the folio listed above.

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Annex B - Working Paper on Housing Matters

Revised Housing Growth Indicators

1. The Council's reliance on the revised HGIs (rHGIs) produced by DRD (now endorsed by DfI) need to be treated with caution. The rHGI's have not been subject to public consultation and examination.
2. The rHGIs are a dramatic reduction in the HGIs produced for Northern Ireland in 2001 under the RDS 2025; also revised in March 2006 following a review of the HGIs; and a dramatic reduction in the HGIs for Northern Ireland set out at Table B2 of the RDS 2035.
3. It is not clear precisely how the DRD reached the rHGIs. A paper has been produced to explain some of the background methodology, but it accepts that there have been differences in data sources and that the information is incomplete in some respects.
4. It is not clear how the rHGIs have been transposed into the new local Council areas. Newtownabbey HGIs figures were previously included in global BMUA figures. No information is provided to understand how the BMUA figures have been split up to the relevant new District Council areas.
5. The rHGIs across NI are dramatically reduced from earlier estimates. This is shown as follows:

RDS 2025		
HGI 1998-2015	160,000	9412 units / annum over 17 years
Uplifted in 2006 to	208,000	12,235 units / annum over 17 years
RDS 2035		
HGI 2008-2025	190,000 ¹	11,176 units / annum over 17 years
Revised RDS 2035 (2012)		
HGI 2008-2025	128,200	7,541 units / annum over 17 years

¹ It is unclear why the Revised Paper Appendix 2 only provides 189,500 dwellings when the RDS clearly notes 190,000.

6. This shows that the global rHGI figures produced in March 2015 for Northern Ireland has dropped by a third since 2012 (when the RDS 2035 was published). This dramatic change in a 3 year period without any public consultation lacks robustness that the process requires.
7. The rHGI figures have changed as a consequence of data that has been produced in 2011, when the most recent Census was undertaken.
8. This Census was taken at the height of the recession in Northern Ireland. During a recession household formation rates are often lower, and household sizes are larger because of uncertainty over jobs and difficulty in funding. The rHGIs do not provide any commentary on the reasons behind why the figures might have dropped in the short period of 3 years from the publication of the RDS in 2012 and the rHGIs in 2015. Either the 2012 figures had an inbuilt allowance that reflected the recessionary times they were prepared in or the rHGIs have an inbuilt allowance. Simply applying the source data without interrogating the information would make the information overly pessimistic. The rHGI Paper (page 4) states that the downward pressure on household projections was noted in other UK countries. Our experience in England, acting for a local authority, is the opposite of this and we would challenge this assumption.
9. Census data in respect of usually resident population is not provided or explained in the paper. It only counts household formation rates. The RDS 2035 (page 17) estimates that by 2023 Northern Ireland population would be 1.946 million. Current predictions below show that Northern Ireland population is likely to be 1.939 million by 2024, a reduction of about 7,000. This is only a 0.36% decline in population. It does not point to a reduction in housing need in Northern Ireland of a third by 2025. The rHGIs presents the proposition that the 94,000 rHGI figure is an optimistic view, and that 70,900 might have been used². This is even more unrealistic given the limited changes in the population projections.
10. It is also noted that RDS 2025 (page 112) considered the Northern Ireland population would grow from 1.689 million in 1998 to 1.794 million in 2015 (a growth of 6% over 17 years). This was the underlying population that supported a HGI then of 160,000. The Table below

² 2012-2025 figures.

shows a growth of 6.8% between 2014 and 2029 (over 15 years). We are unconvinced that the rHGs are robust and must be carefully considered by the Council.

Table 1: Estimated and projected population of the United Kingdom and constituent countries, mid-2014 to mid-2039

					Millions	
	2014	2019	2024	2029	2034	2039
United Kingdom	64.596752	66.927765	69.036245	70.988943	72.720866	74.284443
England	54.316618	56.466327	58.396289	60.188029	61.800146	63.281523
Wales	3.092036	3.139383	3.186839	3.230968	3.261529	3.280122
Scotland	5.347600	5.427982	5.514402	5.595826	5.658708	5.701476
Northern Ireland	1.840498	1.894073	1.938715	1.974120	2.000483	2.021322

Source: Office for National Statistics

Notes:

1. Figures may not sum due to rounding.

11. Similarly, the loss of housing stock through conversion and closures is tainted by data that was recorded during the recession, when the development industry was depressed. The more recent figures of 1,000 dwellings per annum are the beginning of the market recovery, and not reflective of a normal operating market. This is 1,000 below the RDS 2035 and 700 below the RDS 2025 assumption. A more realistic figure would be between 1700 and 2000.
12. The figures of housing need should be more optimistic, as the recessionary trends or post recessionary trends are not likely to continue and are not likely to be reflective of Northern Ireland during the Plan period up to 2030 and beyond.
13. Whilst Council's are required to have regard to rHGs, they can also with justification adopt different figures. In fact alternatives approaches are a key component in the Plan making process as set out in Practice Note 06 (para 5.510). The SPPS requires LDPs to be informed by RDS HGIs, and that they are a guide, however the SPPS also requires a minimum of 5 years housing supply. The rHGs are plainly at the lowest end of the scale and are the starting point for carrying out an objective assessment of need. Our view is that the Council have very good reason to significantly exceed the rHGi figures.

The Evidence Paper

14. The Council's Evidence Paper (EP) on Meeting the Needs of Society provides evidence that the population of the Council area **grew significantly more** than the Northern Ireland average between 1971 and 2011. This is consistent with the attraction of the Council area as a place to live in close proximity to Belfast and having regard to the strong transport network etc. **Every decade since 1971 the Council area has exceeded the NI growth average.**
15. Since 2011 and 2015 the population has increased by 1900 people (EP Table 2.1). That averages at 475 people year. It would equate to a 15 year population growth of 7,125. EP Table 2.25 suggests that the population will only grow by 4,934 in the 15 years between 2015 and 2030 (an average of 329 people per year) about a third lower than occurred between 2011 and 2015.
16. It is not clear why this might be the case, but one explanation appears to be the increase of out migration predicted at EP Figure 2.15. This suggests that the Council area will lose 2411 people, reversing the positive net migration found between 2005 and 2015 (shown at EP Fig.2.4). EP para 2.77 provides no explanation why net migration might reduce so dramatically. No explanation is given why the Council area which has similar characteristics to Lisburn would be affected while Lisburn will have net inward migration of 9,660.
17. The EP (para 2.17) confirms that the average household size is predicted to **decrease** from 2.51 in 2012 to 2.41 in 2030 and that the number of households is predicted to increase. It is unclear how these figures reflect the rHGI figures provided by the DRD which contends the reason for the dramatic reduction in rHGIs is caused by higher average household sizes. EP Table 2.5 also confirms that **average household size in the Council area is below the expected NI average in 2030.**
18. It is notable that the Council area is an attractive place to own a home with 72.22% owner occupation (EP Table 3.3). This is above the NI average of 66.9%.

What is the Housing Demand in The Council Area?

19. In terms of the housing demand in the Council area, EP para 3.11 and 3.53 provide the only figures of a strategic nature that can be considered to objectively look at demand. EP para 3.11 simply applies the rHGI figures of the RDS, which are now 7,200 dwellings (7.55% of the NI total of 94,000).
20. As mentioned above, these rHGI figures have not been tested in the public domain. There is no analysis of how realistic the figures for Antrim and Newtownabbey are. We understand that the Council did not provide any comments to the draft figures when they were provided to them.
21. The RDS (para 3.42) very clearly notes that that the population of Belfast is forecast to fall over the next two decades and the population decline needs to be reversed. In this regard the HGIs at Appendix B of the RDS 2035 were calculated on the basis of growing the population of Belfast, not on the projected population decline. Indeed, current evidence is that the population of Belfast has increased beyond 300,000. This again points towards population growth and not population decline that might support downward revision of HGIs. This is not explained by the rHGI paper.
22. The only figure for Newtownabbey is within the overall BMUA figure of 60,800 to be split among the 6 Council areas. The new figures for the former BMUA Council areas, which cover a larger area by pulling in Antrim and Ards provides a rHGI figure of 37,600 dwellings by 2025. This is a reduction of 23,200 (38%) for the BMUA excluding the reductions for Antrim and Ards.
23. The circumstances for Antrim and Newtownabbey are worse. The EP (para 3.53) indicates that Newtownabbey's share of the BMUA HGI would have been 7,700, which when added to the Antrim HGI, provided a HGI of 15,000. The rHGI figure of 7,200 for the combined Antrim and Newtownabbey area is a 52% reduction in HGI. No analysis is given in the evidence or indeed the POP as to the rational for such a decline, or the implications for the role and function of the new Council area.
24. It is also notable that the rHGI for Antrim and Newtownabbey of 7,200 is even below the 7,500 HGI set out for Antrim alone in the RDS 2025. It will be a self-fulfilling prophesy of

outward migration and population decline if the rHGs are not robustly tested as part of the LDP examination. This would be the opposite of the successful growth in the area over the last 4 decades.

Build Rates and Availability of Land

25. The Council's EP spends time examining the past build rates and uptake of housing land. It seeks to take comfort in the past trends in house building as justification for future housing need. The weight given to past build rates is misplaced. The delivery of housing is only one factor in housing need. There is no evidence set out in the EP that seeks to link what the population might be in the coming years against housing need. The Council leaves this to the rHGs, which are clearly only a starting point for assessment of future housing need, not the answer. As explained above, we are extremely concerned that the rHGs are overly pessimistic.
26. The Council's analysis of build rates (EP para 3.56) looks at the short term rates in the last 3 years (which was a very subdued housing market) and the longer term rates of December 1998-July 2008. However, in combining the figures to reach an average, the Council's approach has included the 3+ years from August 2008 until around April 2012, when construction activity has stopped entirely. It is therefore misleading to take the average build rate over 16.25 years, but more appropriate to take the build rate over 13.5 years, which implies an average annual build rate of 754 units per annum.
27. Applying 754 units per annum over a ten year period from 2015-2025 would just achieve the constrained and untested rHGs, giving Antrim and Newtownabbey a 2025 delivery of 7,500 by 2025³. However given the backlog discussed below, in order to do so would require a significant boost in housing development over the next few years to achieve the rHGI figures. This leads to the urgent delivery of the Plan.

The Unbalanced Supply of Housing

28. The legacy of the previous Council system has resulted in a very unbalanced supply of housing in the Council area. Those settlements in the Antrim area have a severe shortage of housing land while the Newtownabbey area, in particular Ballyclare, has an abundant

³ The POP Option 3 provides a figure of 748/ annum between 1995 and 2010 (i.e. 11,220 units over 15 years), but should exclude the years between 2008-2010, equating to 863 units per annum.

supply of housing land, that despite being zoned since the old Newtownabbey Plan (and retained in BMAP) has never come forward. This is an example of the failure of the planning process. Ballyclare and Crumlin's status is the same in the RDS 2035 (and was the same in RDS 2025). However, as Ballyclare was in Newtownabbey it benefited from BMAP coming forward, while Crumlin's growth has been constrained by the slow progress of the Department producing a new Plan for Antrim. The Council's approach to Ballyclare in the POP is distorted by BMAP and the relationship between Ballyclare and Crumlin is not reflective of the RDS. As such the POP is not sound.

29. In Antrim, the EP states that (para 3.64) that *"as 43% of the original housing zoning or potential for over 2100 dwellings remains. There would appear to have been a very generous zoning of housing land in Antrim Town in the AAP"*. This ignores the fact that the Plan was well beyond its end date of 2001 when the Minister released Phase 2 housing land in the town in 2013 (12 years later). The town's growth during the 2000's was significant. Antrim is a popular place to live, and the vast majority of its Phase 1 housing land was developed. The slow release of Phase 2 lands may in fact have hindered the town's population growth and inward investment.
30. Crumlin has limited zoned housing land available (EP Table 3.10) which is the least amount in any of the main settlements in the Antrim and Newtownabbey area (about 6ha).
31. Slow planning decisions can influence the housing market, development and migration patterns. The outworking of such slow decisions can result in future predictions being the continuation of a problem rather than the recognition and adjustment to address a previous problem. The POP is in clear danger of this in its approach to the Hierarchy of Settlements.
32. The notion that Antrim and Newtownabbey will experience future net outward migration as discussed above as opposed to the inward migration it had during the 2000's is an example of the impact slow housing development, constrained growth in Ballyclare, and the loss of employment in the area during the recession, could have on the Council area. The Council's EP should have included an estimate of housing need based on economic growth projections. In order to be monitored, the Council should identify a number of housing need scenarios, applying household projections as a base line figure and including

additional housing required to facilitate inward migration to support sustainable economic growth in the area which would reflect the Plan objectives. Such a range of scenarios has not yet been prepared.

33. The Council's evidence on the amount of land 'zoned' for housing (a figure of 9,194 at EP paragraph 3.68) is a figure that needs to be carefully scrutinised, particularly when over a third of this is in Ballyclare, which has never come forward in over 20 years. A similarly robust assessment should be taken in respect of the notional 13,903 units available across the Council area. No analysis over availability of this land, lead-in times, build rates or viability is made on any of these sites. A minimum of a 5 year housing land supply must mean that at any time during the Plan period, the Council can demonstrate that there is scope to provide 5 years supply in housing land.
34. The EP suggests that the 13,903 availability of dwellings is a potential excess of 7401 dwellings in the period to 2025, however, it fails to acknowledge that the figure (even adding in the 698 units built between 2012 and 2015 to give 14,601) is similar and indeed below the HGI 15,000 figure that would have applied to the Council area in 2012. This shows that there was a close correlation between the old HGIs and the old Plans. It is somewhat simplistic of DRD to produce a 17 page working paper to slash HGIs and leave the matter to the Council's to rationalise why there is a theoretically large supply of housing land.
35. This is a challenge that the Council must address. Why are the HGI figures are so dramatically less? What consequence has that for the growth strategy envisaged during the previous Plans? and How does the housing allocation support the Plan's Growth Strategy objectives? At present the POP does not adequately tackle these fundamental issues.

Backlog

36. It is also concerning that the Council do not acknowledge the under supply of housing that is taking place, even based on the constrained rHGIs. Even applying the 7200 figure of rHGIs since 2012, this would have required 1662 units (533 X 3) to have been built in the Council area by 2015. Instead, 698 units have been built, showing the Council area has a shortfall of 964 units. If those trends continue, the Council will achieve only 3025 units by

2025. It will fall well below the RDS rHGs. The consequence of not understanding the lead-in times and deliverability of the existing zoned housing land, and reliance on it in the future will have serious negative ramifications for the Council area in the coming decades. A persistent shortfall in supply of this scale in England would warrant a 20% buffer to be included in any objective assessment of housing need. It is our view that the Council should be proactive and seek to add a 5%-20% buffer to the housing figures and that these should be delivered in the first five years of the Plan.

Monitoring

37. The Council should produce a housing trajectory for the Plan period to demonstrate how it intends to deliver the necessary housing over the Plan period to ensure the Council's performance can be measured and monitored and to ensure there is no shortage of housing supply and that the negative societal and economic consequences that that could cause can be avoided.

Housing Supply

38. The evidence presented at EP Table 3.13, which sets out the notional level of housing land supply is too simplistic to be meaningful. Whilst it acknowledged that the long term strategy might be more accurate, as mentioned above, it takes into account distorted build rates, and indeed the build rates should have been 754 per annum, which would give (on the Council approach) 15+3 years of land supply and not the 15+5 years it requires. Again, we dispute these figures as there has been no objective assessment on the delivery of the 13,903 units.

Conclusion

39. The Council's EP needs to:
 - a. Assess why the population projections are so low, when the Council has consistently exceeded the NI average population growth rate for the last 4 decades;
 - b. Why the population projections are constrained, given the 2011-2015 figures already imply a growth exceeding the predictions;

- c. Explain why the Council areas migration levels will change from a net inward migration to outward migration over the Plan period, and what the Plan will do to prevent this;
 - d. Assess the projected household formation rates at a local level and not arbitrarily accept the household formation rates applied in the rHGI, particularly when the evidence shows that Antrim and Newtownabbey will have below average household sizes in future;
 - e. Explain how the Council intends to maintain the strong attraction of Antrim and Newtownabbey area to home owners, given the area has above average owner occupancy rates;
 - f. Set out a range of scenarios based on household formation rates, properly interrogated to reflect the recessionary trends in household sizes, net conversion and to factor in additional housing need to attract inward migration to support and sustain the Council's economic growth strategy;
 - g. Provide a transparent and robust housing trajectory to demonstrate how the housing needs of the Antrim and Newtownabbey will be provided annually to facilitate monitoring and identification of issues in meeting housing needs to avoid overheating of the housing market; and
 - h. How the Council intends to address the already existing backlog of housing which should be addressed during the first 5 years of the Plan.
40. The foregoing comments inform our views on the approaches to the housing issues set out in the POP.

Annex C - Working Paper on Industry and Employment Matters

1. The Council's Evidence Paper (EP) on this issue (Facilitating Economic Development) sets out a number of important considerations. Some of the matters require more careful scrutiny.
2. First it is helpful that the EP (para 2.9) notes the requirement of the SPPS to ensure there is a generous supply, choice and range of economic development land; that economic development is important in sustaining and supporting a vibrant rural community; that re-use of previously developed land is supported; and the SPPS promotes improving integration of economic development and other land uses including housing.
3. The EP (Table 2.2) highlights the importance of manufacturing and service sector work in the area. The construction industry would also fall within the secondary sector, which given many of the construction workers lost their jobs by 2011, would help explain the shift towards tertiary working. The EP fails to provide any analysis of the shifts in the employment sectors between 2001 and 2011, and does not predict whether this is a trend or a blip.
4. The EP (Table 2.2) shows that the employment in the area increased from 58,729 in 2001 to 65,564 in 2011. Given 2011 was a year of recession in Northern Ireland the employment rate was remarkably robust, and this growth of 6,800 (11.6%) over the decade demonstrates the strength of the Council area, and highlights its potential.
5. The EP population projections (para 2.32) show a slowdown in growth. This appears unrealistic given other EPs (see meeting the Need of Society Chapter 2) produced by the Council show that the population of the Council area **grew significantly more** than the Northern Ireland average between 1971 and 2011. This is consistent with the attraction of the Council area as a place to live in close proximity to Belfast and having regard to the strong transport network etc. **Every decade since 1971 the Council area has exceeded the NI growth average.**

6. Between 2011 and 2015 the population increased by 1900 people. That averages at 475 people year. It would equate to a 15 year population growth of 7,125. The EP (Figure 2.1¹) suggests that the population will only grow by 5,435 in the 16 years between 2014 and 2030 (an average of 340 people per year) about a third lower than occurred between 2011 and 2015.
7. It is not clear why this might be the case, and appears to be a highly conservative estimate.
8. The EP (Figure 2.2) confirms that the population of the area will get older, but the EP (para 2.34) suggests the working age population will decline if based on 64 as a retirement age. However, it is generally accepted that people will be working longer in future, in fact from 2019, the state pension age will start to increase for both men and women to reach 66 by 2020. The UK Government is planning further increases, which will raise the state pension age from 66 to 67 between 2026 and 2028. There is evidence that people are retiring later because their jobs are often less strenuous, their knowledge and skill remains a valuable asset to employers and flexible working hours allow people to have a better work life balance, meaning people can gradually retire.
9. The EP (paras 2.43 -2.46) demonstrates that the level of unemployment in the area is low compared to the Northern Ireland average. Overall the evidence confirms the Council area is an attractive place for employers to invest.
10. It is somewhat surprising that the EP (Table 2.5) suggests that over the Plan period employment levels might decline by some 2,000 residents in 2030. This applies wholly conservative assumptions of constant employment rates, which is unsupported by past evidence and a future that is not likely to experience a recession of the scale that occurred in 2008. Behind this prediction must be the assumption that either people over 64 will no longer work (which is wrong), or that the gap in employees will be filled by in commuting to the area or new residents in the area. The consequence of neither scenario occurring is worrying. It would mean companies and jobs leaving the Council area. The Plan therefore needs to Plan either to accommodate more growth (and not less) by analysing how many businesses might start up or expand in the area, and determine how many people will need

¹ This Table runs from 2014. It should run from 2015 and be consistent with data in other EPs.

to be employed to support them. Some of that will involve assessing whether people should commute into the area, whether workers of a post 64 age will fill the gap or whether new residents should be attracted into the area to live close to their work.

11. There is a requirement to cater for a degree of new jobs in the area. The EP (para 2.55) notes that employee jobs increased by 2.8% in the 4 years from 2011 to 2015 (0.7% or 388 per annum). If that trend continued until 2015 it would provide 5,813 new jobs in the area. (it should be noted that 6,800 jobs were created between 2001 and 2011, so again this may be a conservative estimate). If the resident/travel to work area (TTWA) trends of EP (para 2.59) continued, this would support a further 2,790 new jobs for residents in the Council area. This is the opposite of the EP's (Table 2.5) predictions. An ambitious Council would seek to reduce TTWA figures and provide housing and employment in the Council area to improve sustainability and support local rural communities. The POP has not engaged with this concept yet.
12. The EP importantly acknowledges the clear geographical imbalance between the supply of industrial land in the area, with Antrim and Randalstown having very limited industrial land supply and indeed no figures provided for Crumlin (EP Table 2.11).
13. It is helpful, and welcomed that the EP (para 2.76) notes the clear potential for additional industrial lands at Nutts Corner. This is an important strategic location, that is in close proximity to Crumlin and would support population growth in Crumlin. It is located on the strategic transport network, and in close proximity to the airport. It is also previously developed land and its redevelopment is sustainable.
14. We note the Council is likely to continue to collect data and assess relevant evidence to inform the Economic Development aspects of the Plan. We expect that analysis will grapple with:
 - a. The need to reflect more accurately the likely population growth over the Plan period;
 - b. The need to consider the likely employment growth over the Plan period;
 - c. The implications of an older working age population over the Plan period;
 - d. The implications of encouraging increased inward commuting over the Plan period;

- e. The clear geographical imbalance in the supply of industrial land, contrary to the objectives of the SPPS and what will be done to address the imbalance.