
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 | Mrs |
| First Name | Gareth | Angela |
| Last Name | Hay | Wiggam |
| Job Title (where relevant) | | Director |
| Organisation (where relevant) | Racarbry Developments Ltd | Turley |
| Client Name (where relevant) | | |
| Address | 8 Annvale Road Keady | Hamilton House 3 Joy Street Belfast |
| Post Code | BT60 2RP | BT2 8LE |
| Telephone Number | | 028 9072 3900 |
| Email Address | gareth@racarbry.com | angela.wiggam@turley.co.uk |



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: _____

ii) Policy Heading: _____

➤ Strategic Policy (SP) Paragraph Number:

SP4

➤ Detailed Management Policy (DM) Paragraph Number:

DM17

iii) Page Number in Document: _____

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.



(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

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.

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



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.**

Refer to enclosed report



(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.

Refer to enclosed report



(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:

Catriona Blair on behalf of Turley

Date:

20 September 2019

Thank you for your response.



Representations to Antrim & Newtownabbey Borough Council Draft Plan Strategy

On behalf of Racarbry Development Ltd

September 2019

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Contact

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Client

Racarbry Developments Ltd
RACB3000

20 September 2019

Executive Summary

1. This representation is submitted on behalf of Racarbry Developments Ltd who welcomes the opportunity to submit comments on the draft plan strategy issued by Antrim and Newtownabbey Borough Council (ANBC).
2. We appreciate that this draft Plan Strategy is the first, Local Development Plan prepared by ANBC and offer these comments as a 'critical friend' who is keen to see the smooth progression of the draft Plan Strategy from a consultation document to an adopted Plan Strategy.
3. We support the ambition and drive of ANBC in terms of its vision for the Council area however, having reviewed and considered the Local Development Plan, we consider the Plan to be unsound. The legal compliance tests have not been met, and the following policies contained within the Draft Plan Strategy are unsound.
4. The table below summarises the changes sought.

Schedule of Key Comments

| Policy | Comment | Cross ref. |
|---------------------------|---|------------|
| Strategic Growth Strategy | Reconsider the scale of new growth to Crumlin Change Required Item (c) redrafted, moving reference to Crumlin's role as being one of consolidation and recognising its role and status within the BMA: Travel to Work Area | Section 3 |
| SP4 | Housing Growth & Allocation Change required: A robust evidence base should be prepared which takes account of quantitative and qualitative data to support the policy with consideration given as to whether the objectives of the housing policies can be met within the proposed allocation of 9,750 residential units | Section 4 |
| DM 17 | Affordable Housing Change required: The policy should be redrafted (in parts) and supported by robust evidence to underpin proposed thresholds. Further evidence should be prepared to demonstrate the coherence of the overall strategy and how HOU2 emanates from it | Section 5 |

1. Introduction

1.1 Turley submits this representation on behalf of Racarbry Developments Ltd, and welcomes the opportunity to return comments on the Antrim & Newtownabbey Draft Plan Strategy.

1.2 In line with Council's procedures, each representation is set out on a separate page within each of the Chapter headings with the policy clearly identified.

1.3 The structure of the submission is as follows:

- **Chapter 2:** Provides an assessment of how the draft Plan Strategy addresses the legislative compliance tests;
- **Chapter 3:** Sets out the case for growth within Crumlin, commensurate to its role within the Belfast Metropolitan Area – travel to work corridor;
- **Chapter 4:** Details our representations Section 7 - Homes; Strategic Policy 4;
- **Chapter 5:** Details our representations to DM 17 – Affordable Housing; and
- **Chapter 6:** Sets out our conclusions.

2. Legislative Compliance

The draft Plan Strategy is unsound as Procedural Tests P1 and P4 have not been met:

- The draft Plan Strategy has not been prepared in accordance with Council's timetable (P1)
- There is insufficient supporting information to support proposed policies (P4)

2.1 In preparing their Draft Plan Strategy (dPS), Antrim and Newtownabbey Borough Council (ANBC) is required to adhere to the provisions of the Planning Act (Northern Ireland) 2011 ('Act') and the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 ('Regulations').

2.2 This section identifies weaknesses in the compliance of the draft Plan Strategy (dPS) with the Act and the Regulations.

Planning Act (Northern Ireland) 2011

2.3 Under Part 2 (8) of the Act the Plan Strategy must set out:

- the council's objectives in relation to the development and use of land in its district;
- its strategic policies for the implementation of those objectives; and
- such other matters as may be prescribed.

2.4 The Act also stipulates that the Plan Strategy should be prepared in accordance with the Council's Timetable, as approved by the Department and in accordance with Council's Statement of Community Involvement.

2.5 The latest version of the Local Development Plan (LPD) timetable available on Council's website, dated July 2018 cites the publication of the dPS in Q4 2018/2019¹. We acknowledge that this was an estimate, however in practice the dPS was published in Q2 2019/2020; 4 months after the agreed date set out in the timetable. In line with the direction set out in the Act, we would respectfully suggest that consideration should be given to modifying the timetable.

The Planning (Local Development Plan) Regulations (Northern Ireland) 2015

2.6 Regulation 15 identifies a schedule of the information that should be made available alongside the publication of the dPS. This includes:

¹ Dates refer to financial year; not calendar year

“Such documents as in the opinion of the council are relevant to the preparation of the local development plan.”

- 2.7 Our reading of this Regulation is that supporting evidence used to inform or support a draft policy should be provided alongside the draft plan strategy. We have identified several instances where there is a gap in the information base and accordingly contend that the Plan has failed to address procedural test 4.

3. Seizing a unique opportunity – The case for growth in Crumlin

The Strategic Growth Strategy is unsound and fails Soundness Test C1 and C4. The Strategy has failed to take account of the Regional Development Strategy and other planning strategies which identified the growth potential of Crumlin and critically, its inclusion within the Belfast Metropolitan Area: Travel to Work corridor

Context

- 3.1 Within the draft Plan Strategy Crumlin is identified as a town, its role in the settlement hierarchy largely unchanged in over 35 years; identified as a local town within the Antrim Area Plan (APP) 1984 -2001. The town has an attractive countryside setting close to the eastern shore of Lough Neagh, with the Crumlin River and Glen important environmental features to the north of the town.
- 3.2 The settlement is within close proximity to key transport corridors, has good accessibility to both the M1 and M2 motorways and both airports, particularly the International Airport. The town is also accessible to major employers including Randox, and Nutt's Corner (identified within the draft Plan Strategy as a Strategic Employment Location).
- 3.3 Given its high level of accessibility the town is located within the travel to work catchment for the Greater Belfast Area. This factor combined with the construction of new homes from 1999 to 2005 contributed to an increase in the town's population base and fuelled the growth of Crumlin as commuter settlement. Table 4.1 identifies the scale of population change from 2001 to 2017 benchmarked again Randalstown².

Table 3.1: Scale of Population Change 2001 - 2017

| Population Change | 2001-2005 | 2006-2010 | 2011-2015 | 2016-2017 |
|-------------------|-----------------|----------------|----------------|----------------|
| Crumlin | +442 (10.1%) | +262 (5.6%) | -56 (-1.2%) | -9 (-0.19%) |
| Randalstown | +214 (6.7%) | +103 (3.1%) | +17 (0.5%) | -31 (0.9%) |

Source: Population Estimates, NISRA (2017)

² Randalstown is identified for comparison purposes, as it too is identified as a town in the settlement hierarchy

- 3.4 Table 4.1 illustrates the extent of population change over a 16 year period, and the significant level of growth experienced during 2001 to 2005. While the populations within both Crumlin and Randalstown increased by 16.3% and 13.9% respectively both settlements have witnessed a slight reduction in their population base over recent years. This in part, maybe due to a lack of available housing land. Evidence from the Housing Needs Assessment and within Evidence Paper 6 notes that registered housing associations currently have no pipeline of sites within the town despite the level of unmet social housing need.
- 3.5 It is worth noting that the scale of growth within Crumlin during the 10 year period of 2001 to 2011 was one of the highest in Northern Ireland. The Key Statistics for Settlements Report ³prepared in 2015 references that in a 10 year period a number of small towns, with a population range of 5,000 – 9,999 (referred in the report as Band E) experienced a significant rise in population. The towns impacted were:
- Warrenpoint / Burren (25% increase)
 - Dromore (21%increase)
 - Crumlin (20% increase)
 - Coalisland (17% increase)
 - Ballyclare (13% increase)

Location Specific Needs

- 3.6 Paragraph 7.14 of the draft Plan Strategy states that there will only be a minimal requirement for the zoning of additional housing land in the Local Policies Plan, unless locational specific needs dictate otherwise. Our case for reconsidering the overall housing number of 9,750 units is set out in Section 4 of this report. In short, we contend that there are gaps in the evidence base used to formulate the figure. Principally, that there is statistical data together with the findings of housing market and urban capacity assessments which require closer analysis to inform the overall level of housing within the borough council area.
- 3.7 The Spatial Growth Strategy (page 65) of the draft Plan Strategy sets out Council's expectations for the level of growth within each settlement and outlines its role and function. The language used to describe Crumlin focuses on the word 'consolidate' – *consolidate the role of the town as a local service centre for housing, employment, facilities and services to support a growing population and its wider rural hinterland.*
- 3.8 We disagree with Council's assessment of Crumlin in term of its growth ambition. There is a locational specific need which has been ignored; this relates to its previous identification as a location for growth and that it forms part of the BMA Travel to Work Area.

³ <http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2015/general/9915.pdf>

Regional Development Strategy 2035

- 3.9 The Regional Development Strategy (RDS) 2035 was published in March 2012. The previous RDS 2025 identified Crumlin as one of seven small towns which were to be the location of '*significant planned expansion*'. Whilst, the RDS 2035 does not specifically identify Crumlin or any other settlements for planned expansion, the town remains within the Belfast Metropolitan Area (BMA) Hinterland (as illustrated on diagram 3.4) and an appropriate location for growth.
- 3.10 The aims of the RDS include, inter alia, support strong, sustainable growth for all parts of Northern Ireland; supporting towns, villages and rural communities to maximise their potential ('they offer opportunities in terms of their attractiveness as places to invest, live and work'); promoting development which improves health and well-being; improving connectivity; and protecting the environment. The spirit of these aims have been incorporated into the Strategic Objectives of the draft Plan Strategy.
- 3.11 The RDS contains Regional Guidance around the themes of Economy, Society and Environment including, inter alia, guidance in relation to the ensuring an adequate supply of land to facilitate sustainable economic growth; strengthening community cohesion; and managing housing growth. Critically, the RDS retains the same broad evaluation framework of resource, environmental capacity, transport, economic development, character and community services tests from the RDS 2025, within which Crumlin was identified as a location of significant planned expansion.
- 3.12 We note that the draft Plan Strategy has also adopted the same approach. The settlement evaluation for Crumlin, specifically notes:
- Lands to the south of the settlement, off Ballytromey Road have no obvious development constraints
 - The settlement lies in a valley and is well screened from higher ground to the north and south due to mature vegetation
 - There are no constraints on water supply and there is capacity within the WWTW to receive additional units
 - There is a reasonable level of services and resources within the town to support the community
 - Crumlin is located near strategic employment locations such as Belfast International Airport and Nutts Corner
 - There are limited opportunities for small scale employment uses; a weaknesses which should be addressed
- 3.13 In formulating the Strategic Growth Strategy, we can find no analysis which demonstrates that in assessing the role of Crumlin that any consideration was given to its role within the BMA travel to work corridor in supporting Belfast as *the primary economic driver of the region*. Moreover, the narrative which supports the RDS Evaluation Framework (described in Evidence Paper 2) depicts a fairly positive context of the town which does not chime with the low evaluation score awarded in Evidence

Paper 6. Moreover, the characteristics of Crumlin are unchanged from when it was first identified as a location for significant growth,

- 3.14 Notwithstanding the previous comment, in formulating the Plan, limited consideration has been given to previous planning documents which supported further development of Crumlin (Antrim, Ballymena and Larne Issues Paper) by encouraging new development to be focused on lands to the south of the settlement. While we appreciate that site specific issues will not be considered until later in the plan process (Local Policies Plan), it is important to consider the impact of a positive planning stance upon Crumlin. Enclosed within Appendices 1 and 2, we identify and provide details of a site which aligns with a significant number of Council's strategic objectives.
- 3.15 The lands to the south of the town offer the greatest potential to accommodate new development as shown on page 54, Evidence Paper 2; Settlement Evaluation. Rather than seeking to consolidate growth, Council should seize this opportunity and consider how future growth within Crumlin would assist Council in delivering on the strategic objectives of the Plan, particularly opportunities to create jobs through the delivery of business units; a broad spectrum of housing units, including homes for the active elderly; sheltered and assisted living together with a nursing home. In view of the attractive setting of the town and mindful of the close proximity of Crumlin to the airport an 80 bed hotel together with separate lodges is proposed, complemented by a neighbourhood centre.
- 3.16 A development proposal of this order would not only support residents of Crumlin but would assist in supporting the wider rural community by providing residential care opportunities for the aging population; and job opportunities during the lifespan of the projects from its construction through to operation.
- 3.17 We respectfully ask that Council reconsider the approach taken to Crumlin.

4. Strategic Policy 4: Homes

Strategic Policy 4: Homes is unsound as the policy fails the tests of CE1, CE2 and CE4

The proposed level of housing is unrealistic as it has not been informed by robust evidence (CE2) , and it is unclear how the Affordable Homes policy can achieve its operational goals as a result of a lack of robust evidence (CE1). Moreover, in its current form the policy has no mechanisms by which it is able to adapt to changing and unforeseen circumstances (CE4)

We respectfully suggest that a robust evidence base is prepared to support the policy with consideration given as to whether the objectives of the Housing policies can be met within the identified housing allocation of 9,750. All information should be publicly available for review and consideration

Full Response

Housing Growth & Allocation

- 4.1 Strategic Policy 4 identifies the requirement for 9,750 new homes of the period 2015 to 2030. We acknowledge that in formulating this figure, Council has sought to balance the pre-crash build rate of 748 units per annum against the Housing Growth Indicator (HGI) average build rate of 554. The figure of 9,750 units is based on an average of these two rates and projected forward i.e. 650 units x 15 years = 9,750.
- 4.2 At paragraph 7.7 (page 137), Council confirms that the level of new housing units for the period 2015 to 2030 is neither a target to be met or a cap which cannot be exceeded. While we welcome this comment we have concerns that the approach adopted by Council is flawed as to fails to take account of other statistical data and assessments:
- *Build rates* - within the Council area residential build rates have been steadily rising over the last 3 years. Evidence Paper 6 – Housing, paragraph 9.13 indicates that the completion rate for 2019 is likely to be 600 units; a higher rate than the HGI when broken down over the plan period.
 - *The Plan Period* – currently we are 4 years into the Plan period. By the time the dPS is presented for Examination in Public and thereafter adopted, it is likely that other 18 months to 2 years will have past. With this in mind, consideration should be given to ‘rolling forward’ 5 years of allocation.
 - *Housing Market Analysis* – while Evidence Paper 6, paragraph 3.28 notes that the SPSS indicates that housing allocations in LDPs should be informed by (inter-alia) a Housing Market Analysis we cannot find any reference to the assessment. The Council area forms part of the greater Belfast area and travel to work zone, yet there has been no analysis of this socio economic trend and its impact on the local housing market.

- 4.3 Further consideration is required of these factors. The information collated under each topic needs to be considered and analysed when formulating the final housing requirement for the plan area.

Identification of Lands for Housing

- 4.4 Notwithstanding the comments above, we note at paragraph 7.14 Council's indication that it is *unlikely that new lands will be zoned for additional housing* beyond those currently identified. In forming this position we are unaware of any assessment undertaken to determine whether zoned sites and/or windfall sites are suitable, available or viable for residential development⁴. Details contained within the appendices to Evidence Paper 6 (Housing) quantifies the *potential level* of available housing from windfall, but there is no assessment of constraints or site specific issues which may impact on the delivery of these sites. In the absence of an urban capacity analysis which rigorously assesses the potential of each site to make a meaningful contribution to housing within the borough Council area, we respectfully urge Council to maintain an open mind. The question as to whether new lands are required can only be fully answered having completed a robust urban capacity analysis of identified sites (zoned and windfall) and consideration given to infrastructure constraints.

Recommendation

- 4.5 Racarbry Developments respectfully seeks that Council gives consideration to collating further statistical data to inform their assessment of the overall number of homes required, which should include the preparation of a Housing Market Area assessment and a robust urban capacity analysis.

⁴ Drawing on good practice guidance from the NPPF - Housing and economic land availability assessment, paragraphs 20 -26 <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#method--stage-4-assessment-review>

5. Policy DM 17: Homes in Settlements

Affordable Housing

Policy DM 17 is unsound as the policy fails the tests of CE1 and CE4

The policy is incoherent and Racarbry Development Ltd respectfully seeks that Council reviews its evidence base to support this policy

Full Response

- 5.1 Policy DM17, part 17.3 outlines Councils intention to introduce an affordable housing proposal. We note that the policy threshold applies to developments of 40 residential units or more with a minimum of 10% to be for affordable housing. The policy also requires that affordable homes be distributed throughout the development and should not be easily distinguishable i.e. tenure blind.
- 5.2 Racarbry Development Ltds acknowledges that the Housing Strategy presented within the draft Plan Strategy aligns with regional policy objectives as set out in the Regional Development Strategy (RDS), specifically the inclusion of policy mechanisms to provide for the needs of everyone and the provision of mixed tenure housing developments.
- 5.3 While we support the inclusion of policy 17.3, we have concerns about two aspects of the policy.

Lack of Definition

- 5.4 The Strategic Planning Policy Statement (SPPS) defines affordable housing as relating to social rented and intermediate housing. These are defined as:

“Social rented housing is housing provided at an affordable rent by a registered housing association; that is, one which is registered and regulated by the Department for Social Development as a social housing provider. Social rented accommodation should be available to households in housing need and is offered in accordance with the common selection scheme, administered by the Northern Ireland Housing Executive (NIHE), which prioritises households who are living in unsuitable or insecure accommodation”

“Intermediate housing consists of shared ownership housing provided through a registered housing association (e.g. the Northern Ireland Co-ownership Housing Association) and helps households who can afford a small mortgage, but that are not able to afford to buy a property outright. The property is split between part ownership by the householder and part social renting from a registered housing association. The proportion of property ownership and renting can vary depending on householder circumstances and preference.”

- 5.5 Within the draft Plan Strategy the subtle, but important distinction between the two tenures is not set out. We would strongly urge Council to include a definition within

the policy amplification to avoid any confusion, and acknowledge that the definition may be subject to change.

- 5.6 At the time of preparing this representation, the Department for Communities (DfC) had launched a consultation paper on proposed changes to the definition of Affordable Housing. While the proposed change would have no direct impact upon social housing, it would provide an opportunity for the private sector to provide intermediate housing products alongside registered housing associations.
- 5.7 We would suggest that the policy should be reworded clearly identifying the two primary forms of housing tenure.

Threshold & Need Test

- 5.8 The current policy applies to any residential development over 40 units with the requirement being set at a minimum of 10%. Within the supporting papers, we can find no evidence or rationale to support the threshold requirement of 10% and indeed whether alternative thresholds were considered. In addition, no details are provided to confirm that the proposed threshold provides for a reasonable profit level to be secured by the developer.

Recommendation

- 5.9 Racarbry Development Ltd respectfully seeks that Council reviews its evidence base to support the proposed policy threshold of 10% and confirms whether any viability testing was undertaken to support/inform the policy threshold.

6. Conclusion

- 6.1 We support the ambition and drive of ANBC in terms of its vision for the Council area but having reviewed and considered the Local Development Plan as issued, we consider the Plan to be unsound. The legal compliance tests have not been met, the strategic growth strategy does not take account of direction outlined in the RDS and policies SP4 and DM17 should be supported with robust up to date evidence in order to address the tests of Soundness.
- 6.2 As expressed in the representation we are concerned that the future development within Crumlin is being stymied and the opportunity lost to enhance the sustainability credentials of the settlement by failing to identify new lands for development which would improve the economic, social and environmental context of the town.

Appendix 1: Boundary of Development Site

Appendix 2: Development Proposal: Lands at Ballytromeey Road

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RICE GROUP
& ASSOCIATES



BEECHVALE

**A MIXED USE DEVELOPMENT PROPOSAL
CRUMLIN, COUNTY ANTRIM**

OUR GROUP

The Rice Group & Associates founded in the 1960s completed many major contracts for Public and Private Sectors.

Established from Buildings Contractors formed by brothers of the Rice family, in Keady, the Rice Group now consists of Builders Merchants, Supermarkets and Building Contractors.

Their experience includes, the construction and renovation of Hospitals, Colleges, Schools, Leisure Centres, Sewerage Works, Vehicle Inspection (MOT) Centres, Telephone Exchanges, Sheltered Accommodation for Housing Associations, Supermarkets and Builders Merchants.

In addition, they have also completed many projects including Offices, Warehouses and various types of Dwellings.

The Group has an annual turnover averaging in excess of £17,500,000 over the last 15 years, employing an average of 225 people per annum over the same period.



RICE GROUP



“Experienced developers of all types of construction across Northern Ireland”

The Rice Group of companies today includes Supermarkets, Builders Merchants, and Constructions firms, all descended from the original Rice Brothers, who went into business together.

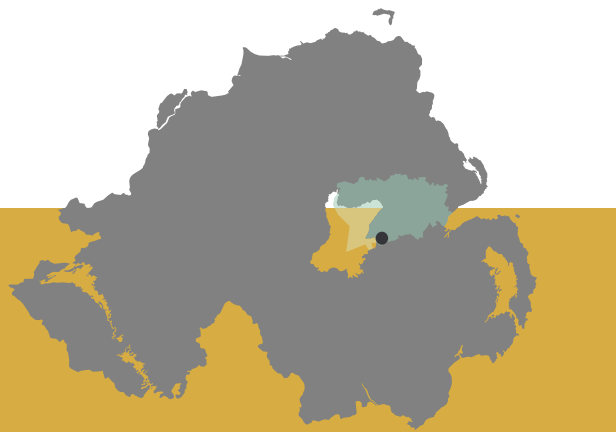
Some of the non-residential projects completed by the various members of the group include :-

- Saint Patrick's College, Armagh
- Armagh Girls High School
- Armagh Recreation Centre
- Telephone Engineering Centre, Belfast
- P.S.V. Centre, Lisburn
- Purdysburn Hospital

Numerous residential developments have been completed, with sites in Keady and Castlecaufield currently being constructed.



SITE LOCATION



The subject site consists of approximately 30 hectares to the South Eastern edge of Crumlin town.

The Northern and Eastern edges of the site are adjacent to over 600m of the current Settlement Development Limit, with the Ballytromery Road running past the Eastern edge for 450m, giving ample room for access.

To the West the existing railway line is close-by with rural landscape to the South

Crumlin is situated near the Shores of Lough Neagh, at the Southern end of the Antrim and Newtownabbey Borough.

Close to the Belfast International Airport and Nutts Corner.

SITE SUITABILITY

Multiple independent planning reports have indicated the site as a preferred site for the expansion of Crumlin, with statutory consultees having no objections during previous planning processes.

UNRIVALLED LOCATION

With geographical and land ownership issues to the majority of lands bordering Crumlin, this site represents a unique opportunity.

CRUMLIN

Crumlin is a historic town within the Borough, its name meaning “The Crooked Glen”. It became established as a mill town hosting the first industrial flour mills in the North of Ireland. Boasting the listed and unique 3-line bridge, where the rail crosses the road, whilst both crossing a river.

Today Crumlin has a population in excess of 5000 people, and is one of the most sought after places to live in the Borough, with significant investment in recent years in areas such as recreation facilities.



OUR PROPOSAL

A mixed-use development scheme to benefit the people of Crumlin and the wider Borough.

It has always been the intention to develop the site, and a number of proposals have been made to the various Area Plan processes over many years. Although no new Area Plan has been forthcoming.

A previous mixed-use scheme which had gained some Antrim Borough political and planning progress, reached pre-Application stage prior to the Borough Council merger.

With planning responsibilities being conferred on the new Councils, new advice indicated that we should not proceed with the mixed-use scheme, and a change to a residential scheme was ultimately refused planning permission on the basis of the site being outside the Development Limit of Crumlin Town.

Given the current delays and potential for future delays to a new Area Plan, we are forwarding this proposal as a necessary and bespoke way to grow the Settlement of Crumlin and to prevent housing supply exhaustion within Crumlin Town.

**LIVE
WORK
PLAY**

**PROPOSAL
INVESTMENT**

£70M

**NUMBER OF JOBS
CONSTRUCTION**

890

**NUMBER OF JOBS
CREATED**

205

PROPOSAL CONTEXT

The extant Area Plan remains the **Antrim Area Plan 1984**, in which Crumlin is defined as a settlement in the 2nd Tier of importance for growth, behind Antrim Town and with equivalence to Randalstown. [p2 3.1-3.2]

The **Preferred Options Paper**, published by Antrim & Newtownabbey Borough Council (Jan 2017), indicated that Crumlin would be in the 3rd of 4th Tier for growth, behind Newtownabbey and Antrim Town. In two the options additionally behind Ballyclare. [p39-41]

The Settlements of Newtownabbey, Antrim and Ballyclare all currently have capacity for growth, as does similar level settlement Randalstown. However, Crumlin is experiencing the effects of Settlement Development Limit constriction and lack of available housing. The Council figures are outdated and incorrect in this regard.

Both the **SPPS** and **RDS2035**

indicate it is a key priority to ensure an adequate and available supply of quality

housing to meet the needs of everyone. [RDS2035 p43, SPPS p69 6.136]

“an adequate and available supply of quality housing to meet the needs of everyone”

Current methodology does not have regard for “availability”. A number of sites within the current Housing Availability figures from the Council have no prospect of being developed, either at all, or in the medium term. Making decisions, or formulating strategic plans based on this methodology is not consistent with the aims of the RDS2035 or SPPS and contrary to good planning.

Given the current level of available housing in Crumlin falls short of 100 dwellings, development becomes essential. The flexibility of this mixed-use scheme allows Stakeholders to provide more than a development of dwellings, but an opportunity to satisfy the needs of the community.

The purpose of this document is a starting point for discussions towards the consensual development of the site, to meet the needs of the community and all other stakeholders.

HOUSING SUPPLY
CRUMLIN
<70

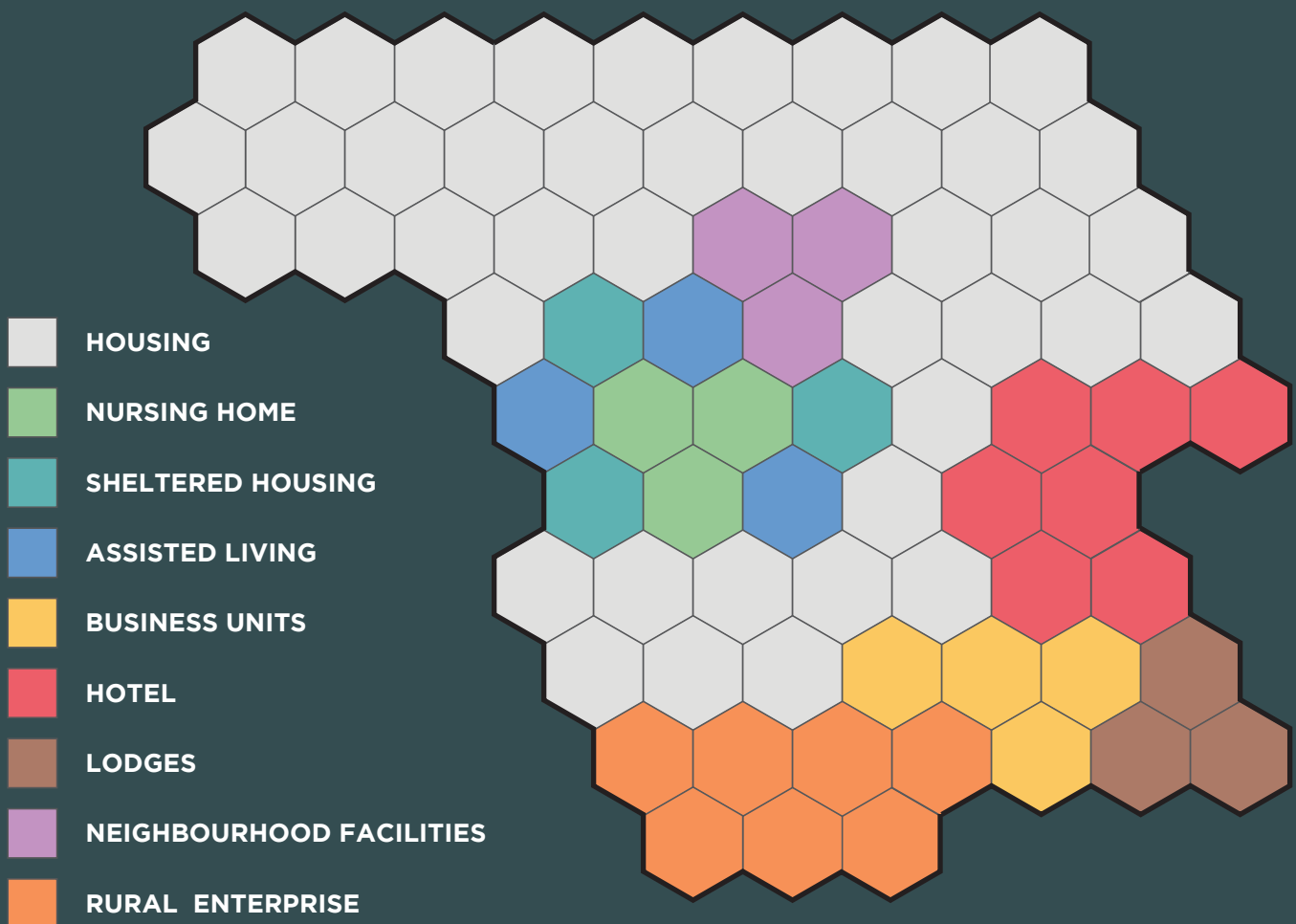
MIXED PURPOSE

| TYPE | NUMBERS | ACRES |
|---|---------|-----------|
| HOUSING Bungalows (1,2 bed), Townhouses, Semi-Detach, Detached | 300 | 42 |
| BUSINESS UNITS Various sizes, with or without secretarial services | 60 | 4 |
| NURSING HOME 70 units | 70 | 3 |
| SHELTERED / ASSISTED LIVING Independent and Assisted living properties | 70 | 6 |
| NEIGHBOURHOOD FACILITIES Small shops, Childcare / Crèche to support development | | 3 |
| HOTEL & LODGES 80 bed hotel with individual fishing-style lodges | 100 | 10 |
| RECREATION / RURAL ENTERPRISE Garden centre, potential for recreation space | | 7 |
| TOTAL ACRES | | 75 |

The table shows an initial proposal for the breakdown of the site into differing uses. The hextile diagram shows an approximation of how this allocation may be laid out across the site.

SCHEME DESIGN

The Neighbourhood facilities placement is key so as to benefit the whole of Crumlin as well as the proposed development. In addition, a primary concern for some users of nursing homes, sheltered accommodation and assisted living accommodation is the proximity to facilities.



In the outline above, the nursing home is in close proximity to the neighbourhood facilities, with the assisted living and sheltered accommodation distributed around the nursing home. The remaining mixed density residential dwellings surround.

With two accesses on the Ballytromery road, the majority of residential access will be via the northern most access, allowing the business units and hotel a somewhat segregated southern access.

SUPPORTED LIVING

Of the 5099 people recorded in Crumlin on the 2011 Census, a maximum of 78 people were housed in some form of supported living home.

The number of people aged 85 and over in Northern Ireland has grown by around 900 people per annum throughout the decade ending mid-2016.

Over the last 10 years the population of Northern Ireland has grown by 6.8% overall, however, the age of this population has increased, with the largest percentage population growth being the over 65 category, which has experienced growth of 25.1%.

CURRENT PROVISION

Crumlin currently has two main providers of aged and assisted living suppliers.

The Whins, built in 1994, is situated on the Lurgan Road has 36 units, communal areas and residential staff. Catering to persons 60 and over.

Lakeview, situated off Main Street, has 30 single units and 6 shared units. None of these have en-suite facilities, and are aimed at 65 and over and persons with physical disabilities.



CURRENT
PROVISION

78
PERSONS

POPULATION
65 OR OVER

16.2%
ANBC BOROUGH

POPULATION
65 OR OVER

490
CRUMLIN



POPULATION
65 OR OVER

9.5%
CRUMLIN

SUSTAINABILITY

The statistics show that only 1.5% of the population of Crumlin can be housed in units specifically designed for persons over the age of 65. Given that 16.2% of the Borough population has reached this age demographic, and only 9.5% (or 490 of 5099 persons) are able to live in Crumlin, a clear problem has been identified.

OUR PROPOSAL

A nursing home with 70 bedrooms, communal areas and residential staff, would form a central hub, around which 50 sheltered accommodation units would be intermingled with 20 independent living dwellings.

“Private owners will not be left behind with our range of fully accessible bungalows also planned in the scheme.”

In addition to the specialist living units provided, there would be a generous supply of fully wheelchair accessible bungalows included in the housing portion of the development.

This proposal would add double the current provision of specialist care units available in the Crumlin area, which we believe to be a more sustainable level and bring the overall population distribution of Crumlin closer to that of the Borough.

Private owners would also be catered for in the development with 1 and 2 bed bungalows.

CREATING SPACES

Our proposal is community focused and driven by a desire to create spaces which facilitate community needs.

The restricted growth of Crumlin in recent years has led to many developments with units tightly packed, some in former gardens or even town centre spaces.

“There is a unique opportunity here to deliver more than just houses, but to deliver spaces fit for the community”

Our solution delivers all types of quality homes integrated into a design ethos putting community first and which gives unprecedented ability for stakeholders to shape the spaces created and not just deliver another block of new houses.

In addition to a mix of housing types, it is fundamentally important to have a mix of ownership options, from affordable homes right through to co-ownership options.

With differing types of housing mixed throughout the scheme, Crumlin can grow and fill the needs of everyone.

Phased Delivery



GRADUAL GROWTH

With the correct design and distribution of the differing types of housing, a natural phased approach to the development will emerge. This will allow Crumlin to grow at a steady rate across many years, in contrast to the famine or feast approach associated with the current system, where a rush of new houses are completed when a new Area Plan is published, with none built towards the end - or beyond - because of the Settlement Development Limits.

| TYPE | PERIOD (YRS) | PER YEAR |
|--|--------------|----------|
| HOUSING Bungalows, Townhouses, Semi-Detach, Detached | 10 | 30 |
| BUSINESS UNITS Various sizes, with or without secretarial services | 2 | 30 |
| NURSING HOME 70 units | 2 | 35 |
| SHELTERED HOUSING Independent and Assisted living properties | 2 | 25 |
| ASSISTED LIVING Independent and Assisted living properties | 2 | 10 |
| HOTEL 80 bed hotel with associated facilities | 2 | 40 |
| SHORT STAY LODGES Individual fishing-style lodges | 2 | 10 |

These lines are identical

One needs changed



BUSINESS & NEIGHBOURHOOD

Crumlin requires employers and new facilities to adequately grow.

For some time now Crumlin has lacked space for retail & commercial business to start or grow.

The conversion of multiple Town Centre sites to residential developments, and the Old Mill site gaining permission for full conversion to Residential use are two key factors.

In addition any future planned expansion of the Town Centre is severely hindered by and encircled by residential properties and geographical features, namely the Crumlin Glen.

The creation of adequate Business Units over 4 acres within this proposal will provide spaces for existing business to expand into along with attracting new businesses. Local stakeholders have already stated many times there are business desperate to relocate within the Town.

Facilities as those proposed would provide services and employment to the people of Crumlin and the Borough and help to attract new employers and residents.



THE GOAL

“ ...to bring Crumlin’s facilities and employment opportunities to the level of similar towns in the borough hierarchy. ”



LOCAL SUPPORT

Business units will serve the local community by supplying facilities and products as well as offering much needed local employment.

There is potential for a new Medical Centre within this development to serve the needs of the people of Crumlin and the wider area.

1

CHILDCARE

With an estimated 300 new homes there will be a number of new families who will require the support of pre-school and after school childcare facilities.

2

SPECIALIST FACILITIES

There will be specialised needs for over 65s and vulnerable users. These may be met with a range of specialist shops to small convenience shopping.

3

COHESION

Small social business that bring the community together, such as coffee shops, cafés and hairdressers should also be considered.

4

COMMUNITY

Spaces for fitness classes, such as Pilates and Yoga, and small gatherings such as birthdays or community events, would serve these community needs.

REST & RELAXATION

With no hotel, Crumlin's business users and visitors are restricted to B&B style options.

Modern business travellers are less interested in spending time inside guest rooms and more interested in

interacting in public areas of their hotel.

Alongside the proposed 80 bedrooms, there should be a usable lobby space and lounge.

Business users may also have need for conference facilities, small meeting rooms, or even hot-desks. Crumlin's good internet infrastructure would facilitate these needs well.

Another benefit many hotels offer communities and guests are gym facilities.

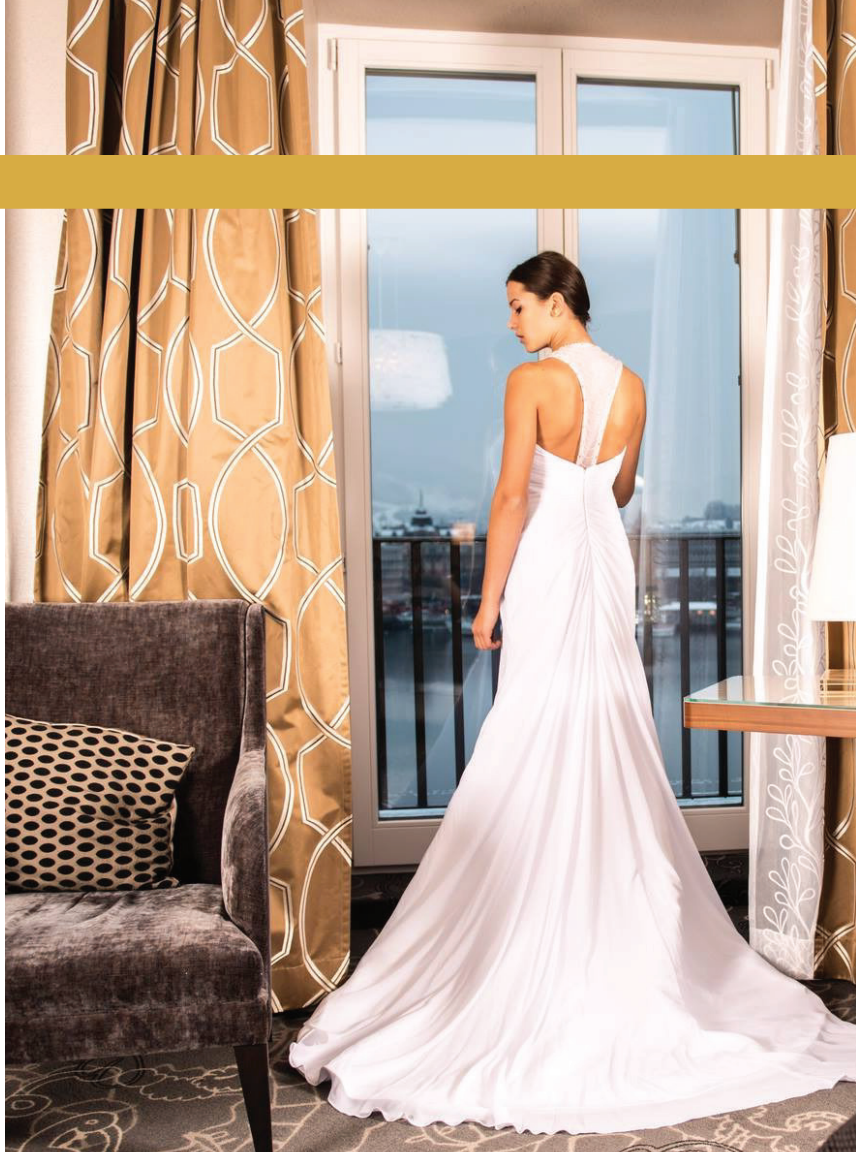


TARGET USERS

In 2017, Belfast International Airport exceeded its passenger record of 5.2 million, eventually handling over 5.8 million passengers.

The top 9 destinations were all within the UK which indicates a large number of passengers were business users.

Given the proximity of Crumlin to the airport, a hotel away from the aircraft noises, avoiding the transport problems of Belfast, in a quiet town is an attractive destination option.



COMMUNITY USE

Crumlin currently does not have a venue for wedding receptions which can also accommodate guests.

The proposed 80 beds along with a hall suitable for functions would allow couples from near and far to get married in their locality and cater to all their guests needs.

In the first 9 months of 2017 there were 2 million holiday trips for 13.7 million night stays to Northern Ireland, an increase of 20%.

Not only is Crumlin ideally placed next to the airport, but it is also on the shores of the largest lake on the island of Ireland and in the British Isles - Lough Neagh.

It is an attractive spot for bird watchers due to the number of species which winter and summer there.

Fishing is also popular with salmon, trout and perch common. Bream, gudgeon, pike and rudd can also be found by the lucky fisherman.

LODGES

With local opportunities for bird watching and fishing, the proposed lodges would cater for tourists from near and far.

Lodges separated from the main hotel also offer an opportunity to cater to a growing market, corporate away days and team building sessions.

Given the privacy of the lodges combined with the facilities and infrastructure of the hotel these lodges would provide an excellent setting for local and further afield businesses.

GREEN CREDENTIALS

All modern development has to strike a balance between progress and protecting the environment.

Crumlin is uniquely placed to benefit from the green credentials of Antrim and Newtownabbey borough council.

“Petrol and Diesel are a thing of the past. The future is electric.”

The UK Government and car manufactures are already taking great strides towards a fossil fuel-less future.

With the creation of solar farms in the locality of Crumlin, infrastructure for electric vehicle charging should be built-in to this development, to allow business and residential users to benefit fully from this resource.

In addition, we intend to retain as much as possible of the existing hedge-lines and compliment them, where appropriate.

Another consideration should be the solar electricity generation that may be possible on-site, for the business units and hotel. Adding further incentives to inward investment in Crumlin and the borough.



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OUR VISION



This proposal is the foundation and basis on which we engage stakeholders.

Our aim is to work with stakeholders to shape the vision of this development into something to benefit everyone, from the local community to the wider borough.

We are seeking engagement to begin the process of delivering this project and the expected investment of £70 million to the town of Crumlin and the Borough of Antrim and Newtownabbey as soon as practically possible.

We look forward to listening to your feedback and working together to deliver this project.

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Rice Group
8 Annvale Road
Keady, BT60 2RP

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