

ANTRIM & NEWTOWNABBEY LOCAL DEVELOPMENT PLAN 2030

Draft Plan Strategy Representation

Strategic Policy 4: Homes

Ballyrobert

Lotus Homes (UK) Ltd.

September 2019

Strategic Policy 4: Homes - A Representation to Antrim and Newtownabbey's Draft Plan Strategy (Local Development Plan 2030)

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1. Introduction

- 1.1 This representation has been prepared by **TSA Planning** on behalf of our client **Lotus Homes (UK) Ltd.**, in respect of Antrim and Newtownabbey Borough Council's published Draft Plan Strategy (DPS), for their Local Development Plan 2030.
- 1.2 The paper assesses Strategic Policy 4: Homes within the Draft Plan Strategy including the associated amplification text which we believe is **unsound** in its current form.
- 1.3 **Section 2** of the paper analyses Policy SP 4.2 and Paragraphs 7.7, 7.13, 7.14 and 7.17 of the DPS, setting out why we currently believe these to be unsound, the appropriate evidence and changes required to ensure the DPS is sound.
- 1.4 **Section 3** relates to the allocation of housing growth to individual settlements set out in SP 4.3 and Table 6, and associated paragraph 7.10 of the DPS.
- 1.5 **Section 4** sets out our views in respect of Policy DM 17: Homes in Settlements in relation to Affordable Housing.
- 1.6 **Section 5** identifies and promotes lands within Ballyrobert.
- 1.6 **Section 6** sets out Conclusions in respect of this representation.
- 1.7 We respectfully request this representation is heard by **oral hearing** at Public Examination stage.

2. Policy SP 4.2 - To provide for a sustainable level of housing growth and an adequate choice of housing the Council will seek to facilitate the delivery of at least 9,750 new homes across the Borough over the Plan period 2015 to 2030; and

Paragraphs 7.7; 7.13; 7.14 and 7.17 of the Draft Plan Strategy

2.1 Summary

- 2.1.1 Given our previous concerns relating to the method of basing housing growth on the revised down HGI figures published in 2016, we welcome that the Council has not solely relied upon the revised HGI Figure to calculate housing growth. It is also welcome that the Draft Plan Strategy states that Council's estimate of 9,750 new dwellings is to be treated as "neither a target to be met, nor a cap which cannot be exceeded (Para. 7.7). However, we believe that in their current form, the above aspects of the DPS are unsound as identified at **Table 1** and our detailed response below.

Table 1: Summary of Relevant Soundness Tests

<i>Soundness Test P1 – Has the DPD been prepared in accordance with the Council's timetable?</i>
The Council produced a revised Timetable in July 2018. The publication of the Draft Plan Strategy and its consultation period is currently running 6-9 months behind schedule
<i>Soundness Test C1 – Did the Council take account of the RDS</i>
Under Policy RG 8 of the RDS requires an <i>adequate and available</i> supply of quality housing to meet the needs of everyone, which has not been fully considered within the evidence base or paragraphs 7.13; 7.14 and 7.17 of the Draft Plan Strategy.
<i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i>
The SPPS identifies that Councils should ensure an adequate and available supply of quality housing to meet the needs of everyone and provision of mixed housing development with homes in a range of sizes and tenures. Within the Draft Plan Strategy and Evidence Paper 6, the Council have not analysed the availability of housing land or indicated that this will be undertaken during the Local Policies Plan.
<i>Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow</i>
The inflexible nature of the current housing growth figure has the potential to result in contradictions between the Draft Plan Strategy and Local Policies Plan when designating housing land. Whilst it is stated that the figure of 9,750 dwellings is not a cap, the method of allocating the growth and the associated policy content does not make allowances for any

additional housing growth over this figure. This essentially means that it is a cap on housing growth.
<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i>
The text within Paragraphs 7.13; 7.14 and 7.17 of the Draft Plan Strategy refer to Evidence Paper 6: Housing and state that committed housing sites represent a significant excess of housing in comparison to the housing growth figure. However, the evidence base has not been thoroughly analysed to ensure that the stated committed housing sites are achievable or available. This will impact upon the deliverability of housing within the plan period.
<i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i>
The identified housing growth figure of 9,750 dwellings does not allow for a probable delay in the adoption of the Plan which could hinder the Council's ability to review and amend the Plan prior to 2030. This is particularly important when its is estimated that build rates will exceed 650 dwellings per annum within 2 to 3 years.

2.2 Detailed Response

Timescales and Flexibility

- 2.2.1 The current housing growth figure of 9,750 dwellings is too restrictive when considering the LDP timetable and any potential change in circumstances prior to the adoption of the Local Policies Plan. Within the Council's Preferred Options Paper, the overall housing growth figure incorporated a 5-Year land supply to 2035 which equated to a total housing growth figure of 13,000 dwellings. We note that at Paragraph 5.3 of their POP response, DfI stated "*The SPPS provision relating to the maintenance of a 5-year supply of land for housing is to ensure that, within the lifetime of the plan, there is always a 5-year supply of genuinely deliverable housing land available. Council should ensure that the plan incorporates monitoring provisions to ensure that this supply is maintained, and the plan reviewed, should monitoring conclude that the housing supply falls below this threshold*". In response, as identified on Page 77 of the POP Consultation Report, the Council have revised the overall housing growth figure to reflect the LDP period 2015-2030. Furthermore, in respect of monitoring provisions, Page 78 of the Consultation report states that the Council undertakes an annual housing monitor to measure the uptake and remaining supply of housing land within the Borough which ensures continued flexibility throughout the LDP period, along with a sustainable and managed release of housing land.

- 2.2.2 Whilst we welcome the Council's methodology, we do not believe these provisions are adequate or realistic to ensure the *delivery* of housing need across the Borough within the Plan period. We note that according to the Council's revised Timetable (July 2018), the Local Policies Plan is not due to be adopted until Q4 2023/24. Given that the publication of the Draft Plan Strategy and consultation period is currently 6 to 9 months behind schedule, we feel it is reasonable to anticipate that the full adoption of the Plan will be delayed past the March 2024 timeframe. This could result in less than 5 years between the adoption of the Plan and the end of the Plan period. Given these delays, and therefore the limited time for review and amendment of the Plan prior to 2030, we believe it would be appropriate to include a housing growth figure to 2032 to allow for adequate flexibility and time to review in the event of a newly amended timetable. This will equate to an overall housing growth figure of 11,050 dwellings.
- 2.2.3 We acknowledge that the Policy (SP 4.2) aims to facilitate the delivery of *at least* 9,750 dwellings by 2030, which would indicate this figure could increase over time. However, this housing growth figure has informed growth allocations for individual settlements and in turn will provide the basis of designating housing land within the Local Policies Plan. Given that the Draft Local Policies Plan is not estimated to be published for another 2 years (and this could be subject to delay), there is a risk that a change in circumstances between the adoption of the Plan Strategy and the designations within the Local Policies Plan could result in the housing growth figures for settlements being inadequate. For example, within Ballyrobert, there have been 61 housing completions in the years 2015-19, which already represents almost double their housing growth allocation to 2030. Should this be the case across other settlements, the allocations within the Plan Strategy would be inconsistent with the Local Policies Plan. As such, the flexibility afforded by the increase in overall housing growth will also allow for any change in circumstances over the Plan period such as an increase in housing needs or variation in market demands.
- 2.2.4 This flexible approach is taken by the Council in respect of economic development land. We note at Paragraph 8.7 of Evidence Paper 3 – Economic Growth, the Council justifies a greater surplus of employment land in order to provide the 'adequate and available' supply of accessible land, in line with the RDS, which will also ensure the potential to readily accommodate unexpected future economic growth. Given the RDS also requires an adequate and available supply of housing, and the volatile nature of the housing market, we believe that a similar strategy should be adopted in respect of housing, which would be facilitated by the increase in the housing growth figure to 11,050 dwellings.

Deliverability and Evidence

- 2.2.5 The Draft Plan Strategy is unsound due to the text's over emphasis on the excess of existing housing commitments, as the evidence on which it is based is not sufficiently robust. The text refers to Evidence Paper 6: Housing and claim that studies in relation to the ability of existing settlements to supply housing units have been undertaken. Whilst we appreciate that Table 12 within the evidence paper sets out the potential remaining yield within settlements, this has not been sufficiently interrogated to ensure the identified "Committed Sites" are both adequate *and* available, as required under Policy RG 8 of the RDS 2035.
- 2.2.6 On Page 88 of the POP Consultation Response, the Council state *"The majority of housing zonings already have live planning permission or have been built on. Remaining sites are part of the fabric of the urban settlement and are largely regarded as acceptable for development. Uncommitted zone sites will be reviewed and identified at the Local Policies Plan stage"*. However, this review of existing housing zonings is not mentioned within the Draft Plan Strategy or Evidence Paper 6. Furthermore, there is no reference as to whether sites are *available* and therefore *deliverable* within the plan period. There are a number of zoned sites, particularly within those settlements under the Antrim Area Plan, which have been zoned, in some cases since 1989, and there has been no evidence of landowners bringing these lands forward for development. Consultations should be carried out with landowners of "committed sites" to assess the availability and deliverability of these lands over the plan period. This should be carried out in respect of zoned sites, however, this will also be vital in respect of committed white lands, as it is reasonable that planning applications for other uses could be submitted, and in some cases implemented, prior to the preparation of the Local Policies Plan. Without consultation with landowners, it is not appropriate or realistic to presume these sites will deliver housing within the Plan period. Discussions with landowners of sites under construction will also identify current build programmes, which can assist the Council in understanding how many extant dwellings are planned to be completed within the plan period prior to 2030. The Plan policy (SP 4.2) states the number of dwellings the Council hope to *deliver* by 2030 and this could be significantly hindered if currently committed or zoned housing sites within the Local Policies Plan are not *available* for development. Without a more robust evidence base and without ensuring a certain degree of flexibility, to identify that the Plan Strategy is relying upon "committed" sites means that the plan is therefore unsound.
- 2.2.7 Whilst we appreciate that further studies will be carried out at the Local Plan Policies stage, we feel that in order to be consistent, the wording of Paragraphs 7.7; 7.13; 7.14 and 7.17 within the Draft Plan Strategy should be amended to remove reference to an excess of committed housing sites as this has not been adequately assessed.

2.3 Changes to the Draft Plan Strategy

2.3.1 Based upon the above commentary, we respectfully suggest the following amendments are made to ensure the Plan Strategy is Sound, as detailed in **Table 2**.

- *Amendment 1:* Amend the overall housing growth figure within SP 4.2 to at least 11,050; and
- *Amendment 2:* Remove reference to an excess/ample supply of committed housing sites within Paragraphs 7.13; 7.14 and 7.17, and replace with a commitment to carry out additional analysis, including consultation with landowners, which will inform the need for, and location of, additional housing lands at the Local Plan Policies stage.

Table 2: TSA suggested changes in relation to tests of soundness

<i>Soundness Test P1 – Has the DPD been prepared in accordance with the Council’s timetable?</i>
Amendment 1 allows for a revised timetable, taking into consideration current delays
<i>Soundness Test C1 – Did the Council take account of the RDS</i>
Amendment 2 provides allowances for further analysis of the evidence base and will ensure an adequate and available supply of quality housing to meet the needs of everyone in line with Policy RG 8 of the RDS 2035.
<i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i>
Amendment 2 provides allowances for further analysis of the evidence base and will ensure an adequate and available supply of quality housing to meet the needs of everyone in line with the SPPS.
<i>Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow</i>
Amendment 2 will ensure that the Plan Strategy and Local Policies Plan are consistent and logical in their approach.
<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i>
Amendment 2 will ensure that the Strategy, Allocations and Designations are realistic and appropriate, founded on a robust evidence base.
<i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i>
Amendment 1 allows reasonable flexibility for changing circumstances between the adoption of the Plan Strategy and Local Policies Plan.

2.3.2 We will assess how housing growth should be allocated across settlements within the **Section 3**.

3. **DPS Table 6: Allocation of Housing Growth 2015 to 2030; and Paragraph 7.10**

3.1 Summary

- 3.1.1 Housing allocations within the Draft Plan Strategy have been amended in line with DfI comments, the RDS Settlement Evaluation Framework and Existing Commitments. Whilst in general we welcome the revised methodology and agree that the above-mentioned factors should form part of the Council's consideration, we feel the Draft Plan Strategy is currently unsound based upon the reasons set out in **Table 3** and the detailed response below.

Table 3: Summary of Relevant Soundness Tests

<i>Soundness Test C1 – Did the Council take account of the RDS</i>
Under Policy RG 8, the RDS states that Council's should also take account of need identified, in the Housing Needs Assessment/Housing Market Analysis when allocating housing land. Whilst we appreciate the Council have considered the Settlement Hierarchy, existing commitments and the RDS settlement evaluation framework in allocating housing lands, the needs of specific settlements do not appear to have formed part of the allocation process.
<i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i>
Sustainable development is at the heart of the SPPS. The DPS does not take sufficient account of this when allocating housing growth within Villages, Hamlets and the Countryside, particularly in respect of the interrelationship between the location of housing, infrastructure and sustainable patterns of transport. The SPPS further identifies that Councils should ensure an adequate and available supply of quality housing to meet the needs of everyone and provision of mixed housing development with homes in a range of sizes and tenures. Within the Draft Plan Strategy and Evidence Paper 6, the Council have not analysed the availability of housing lands or indicated that this will be undertaken during the Local Policies Plan.
<i>Soundness Test 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</i>
In conjunction with Soundness Test C1, whilst Table 7 of Evidence Paper 6 outlines the Social Housing Need for each settlement as sourced from the NIHE Annual Housing Needs Assessment, this does not appear to have been considered when allocating housing between settlements.
<i>Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow</i>

The over allocation of housing growth to Hamlets at the expense of Villages is not in line with the Spatial Growth Strategy or other proposed Policies which promote sustainable development throughout the Plan.
<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i>
Housing allocations for Crumlin and Randalstown are currently unrealistic and inappropriate when considering their size and appropriate evidence including the identified housing need. Furthermore, the allocated growth of 750 dwellings in the countryside is not realistic or founded on a sufficiently robust evidence base.
<i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i>
The allocations within the Draft Plan Strategy are currently too restrictive in respect of Crumlin and Randalstown when considering their size and potential changing circumstances. In addition, the allocation to Villages is currently too restrictive when considering current demand and their role and function in relation to Hamlets.

3.2 Detailed Response

- 3.2.1 Whilst we acknowledge that housing allocations between settlements have been amended in line with the Spatial Growth Strategy, the settlement evaluation framework of the RDS and existing commitments, we believe that further factors should be considered in order to ensure allocations are truly reflective of sustainable development principles and housing need across all settlements.

Metropolitan Urban Area, Major Hub Town, Large Town and Towns

- 3.2.2 The SPPS sets out a process for allocating housing land which should be informed by the RDS Housing Growth Indicators, the RDS Evaluation Framework, existing housing commitments, urban capacity studies, application of a sequential approach, Housing Needs Assessment and Transport Assessments. In this respect, the housing allocation figures should also be informed by housing need within settlements. As stated on page 12 of the Antrim and Newtownabbey Housing Investment Plan Annual Update 2018, the requirement for new social housing in the Borough has continued to increase since 2012 with the greatest need situated in Antrim Town, Crumlin, Randalstown, Glengormley and Rushpark. This is supported by Table 7 of Evidence Paper 6: Housing, which sets out the social housing need for each settlement over the Plan Period 2015-30 as shown at **TSA 1**.

Urban Area/Settlement	Total social housing need to 2030	No. units started since April 2015	No. units programmed	Remaining Social housing need to 2030
Longlands – Glengormley – Mallusk	550	70	74	406
Rathcoole-Monkstown – Whiteabbey	450	144	25	281
Mossley – Ballyduff	150	21	48	81
Antrim Town	200	45	0	155
Ballyclare	80	46	0	34
Crumlin	180	1	0	179
Randalstown	100	1	22	77
Rural settlements	90	11	20	59
TOTAL	1800	339	189	1272

TSA 1: Social Housing Need 2015-30

3.2.3 Page 12 of the Housing Investment Plan Update 2018 also identifies that increasingly, areas of social housing need are emerging in locations where the Housing Executive does not own land. As such, housing associations are competing on the open market against the private sector and this can make it difficult to obtain sites in areas of housing need throughout the Borough. It is particularly important to take this into account when allocating housing lands within the Local Development Plan to ensure *adequate* and *available* housing land is secured, ensuring the delivery of housing to meet the needs of everyone is not hindered.

3.2.4 We appreciate that Ballyclare currently benefits from a considerable level of existing committed housing lands which has been considered during the allocation process. However, we feel that the stated allocation of 11.3% for Ballyclare is at the expense of Randalstown and Crumlin. These two settlements are designated as Small Towns within the settlement hierarchy with populations of over 5,000 people and a significant social housing need remaining to 2030.

Villages, Hamlets and the Countryside

3.2.5 In respect of housing growth allocations to the proposed Villages, Hamlets and the Countryside, the Draft Plan Strategy is currently unsound as there is unsustainable and disproportionate growth allocated to the Hamlets and the open Countryside at the expense of Villages, which provide a more accessible environment for residents. The Council have endeavoured to estimate the number of dwellings which will be completed within the countryside and used this as starting point for housing allocations, with the remaining 9,000 dwellings being assigned

between settlements. Whilst the majority of policies within the Draft Plan Strategy are based on a need for sustainable development in accordance with the RDS 2035 and SPPS, sufficient account of this has not been taken when allocating housing growth. In order to promote sustainable development, the needs and growth of settlements should be allocated in the first instance. This will ensure that housing growth is primarily situated in locations which have the best access to available infrastructure and opportunities for active and sustainable transport options.

- 3.2.6 In their allocations, the Council have not taken sufficient cognisance of the evidence provided and are inconsistent with other policies brought forward within the Plan. As previously mentioned, a number of the proposed policies within the Draft Plan Strategy are centred around the promotion of sustainable development, particularly Section 4 and Strategic Policy 3. Whilst these policies are welcome, sufficient regard has not been given to the provided Evidence Paper 2: Settlement Evaluation when ensuring the housing allocations are consistent with these policies, particularly in respect of Hamlets. As identified in Evidence Paper 2, the majority of proposed Hamlets (18 out of 29) do not avail of connections to Waste Water Treatment Works and as such rely on septic tanks. Furthermore, many Hamlets have minimal or no footpath provision with a number not availing of streetlighting. Therefore, while we appreciate that some level of growth will be expected in Hamlets, and indeed should be encouraged, we believe the overall allocation can be reduced when considering future development proposals will be assessed against the Strategic Policy throughout the Plan which promotes sustainable development.
- 3.2.7 In respect of the Countryside, an allocation of 50 dwellings per annum has been formed on the basis of completion rates from 2015-2018. We accept that this has been marginally reduced from 53 dwellings, as justified by the inclusion of new Hamlets. However, we believe there is evidence to reduce this further. Firstly, Evidence Paper 18: Rural Pressure Analysis shows at Figure 2 the rural dwelling hotspots. Many of these hotspots are situated in locations which tally with proposed new Hamlets, including Creavery, Maghereagh, New Mill, The Diamond and Loanends. Therefore, it is reasonable to presume the designation of new Hamlets will reduce the overall number of completions in the Countryside by more than 3 dwellings per year.
- 3.2.8 Furthermore, policies in respect of Housing in the Countryside appear to be slightly more onerous than those currently within PPS 21, particularly in respect of Infill/Ribbon Development and Dwellings in Existing Clusters. It is therefore reasonable to presume a lower level of housebuilding within the Countryside once the DPS is adopted, in comparison to the existing situation. There is therefore sufficient scope, when considering all the evidence provided, for

a more sustainable allocation of housing growth, located in Villages, whilst maintaining and sustaining sufficient growth to support rural communities within Hamlets and the Countryside.

Overall Allocations

- 3.2.9 In light of the above points, we have endeavoured to prepare an alternative allocation of housing growth, in line with all relevant considerations, which we believe is sound and sustainable. **Tables 4 to 7** below identify different allocation scenarios including their relationship with settlement growth and social housing need (in respect of the 5 largest settlements). **Tables 4 and 6** set out the current allocations suggested by the Council in respect of a housing growth figure of 9,750 dwellings (**Table 4**) and 11,050 dwellings (**Table 7**), as per our rationale discussed in **Section 2**. **Tables 5 and 7** show our revised allocations in respect of the two housing growth scenarios. The TSA revised allocations have taken full account of the principles which have guided the allocations within the Draft Plan Strategy but further promote sustainable growth, respect the Spatial Growth Strategy along with all other proposed Policies and take account of all evidence provided.

Table 4: Draft Plan Strategy Allocations, based on Housing Growth of 9,750 dwellings

Settlement	Allocation	Allocation %	Households (2011)	Growth %	Social Housing Need 2015-30	Social Housing Need as % of Allocation
Metropolitan Urban Area						
Newtownabbey	3900	40%	27371	14.2%	1150	29%
Major Hub Town						
Antrim	2750	28.2%	9978	27.5%	200	7.3%
Large Town						
Ballyclare	1100	11.3%	4184	26.2%	80	7.3%
Towns						
Crumlin	350	3.6%	1847	18.9%	180	51%
Randalstown	350	3.6%	2077	16.8%	100	29%
Villages						
Templepatrick	100	1.0%	629	15.9%		
Doagh	75	0.75%	613	12.2%		
Ballynure	60	0.6%	386	15.5%		
Toome	55	0.55%	265	20.7%		
Burnside	50	0.5%	483	10.3%		
Ballyrobert	35	0.35%	242	14.4%		
Dunadry	10	0.1%	190	5.2%		
Parkgate	10	0.1%	261	3.8%		
Straid	5	0.05%	154	3.2%		
Hamlets	150	1.5%	549	27.3%		
Countryside	750		7141	11%		

Table 5: TSA Revised Allocations based on Housing Growth of 9,750 dwellings

Settlement	Allocation	Allocation %	Households (2011)	Growth %	Social Housing Need 2015-30	Social Housing Need as % of Allocation
Metropolitan Urban Area						
Newtownabbey	3900	40%	27371	14.2%	1150	29%
Main Hub Town						
Antrim	2650	27.2%	9978	26.5%	200	7.5%
Large Town						
Ballyclare	850	8.7%	4184	20%	80	9.4%
Towns						
Crumlin	550	5.6%	1847	29.7%	180	32.7%
Randalstown	500	5.1%	2077	24%	100	20%
Villages						
Templepatrick	150	1.5%	629	23.8%		
Doagh	110	1.1%	613	17.9%		
Ballynure	90	0.9%	386	23.3%		
Toome	80	0.8%	265	30.1%		
Burnside	75	0.7%	483	15.5%		
Ballyrobert	55	0.6%	242	22.7%		
Dunadry	15	0.15%	190	7.8%		
Parkgate	15	0.15%	261	5.7%		
Straid	10	0.1%	154	6.4%		
Hamlets	100	1.0%	549	18.2%		
Countryside	600		7141	8.4%		

Table 6: Draft Plan Strategy Allocations based on Housing Growth of 11,050 dwellings

Settlement	Allocation	Allocation %	Households (2011)	Growth to 2032 %	Social Housing Need 2015-32*	Social Housing Need as % of Allocation
Metropolitan Urban Area						
Newtownabbey	4420	40%	27371	16.1%	1303	29%
Main Hub Town						
Antrim	3120	28.2%	9978	31.3%	226	7.2%
Large Town						
Ballyclare	1250	11.3%	4184	29.8%	91	7.3%
Towns						
Crumlin	400	3.6%	1847	21.6%	204	51%
Randalstown	400	3.6%	2077	19.2%	113	28%
Villages						
Templepatrick	110	1.0%	629	17.4%		
Doagh	85	0.75%	613	13.8%		
Ballynure	65	0.6%	386	16.8%		
Toome	60	0.55%	265	22.6%		
Burnside	55	0.5%	483	11.3%		
Ballyrobert	40	0.35%	242	16.5%		
Dunadry	10	0.1%	190	5.2%		
Parkgate	10	0.1%	261	3.8%		
Straid	5	0.05%	154	3.2%		
Hamlets	165	1.5%	549	30%		
Countryside	855		7141	11.9%		

*Calculated using 2015-30 figures

Table 7: TSA Revised Allocations based on Housing Growth of 11,050 dwellings

Settlement	Allocation	Allocation %	Households (2011)	Growth to 2032 %	Social Housing Need 2015-32*	Social Housing Need as % of Allocation
Metropolitan Urban Area						
Newtownabbey	4420	40%	27371	16.1%	1303	29%
Main Hub Town						
Antrim	3010	27.2%	9978	30.1%	226	7.5%
Large Town						
Ballyclare	960	8.7%	4184	22.9%	91	9.4%
Towns						
Crumlin	620	5.6%	1847	33.5%	204	32.9%
Randalstown	570	5.1%	2077	27.4%	113	19.8%
Villages						
Templepatrick	165	1.5%	629	26.2%		
Doagh	120	1.1%	613	19.5%		
Ballynure	110	0.9%	386	28.4%		
Toome	95	0.8%	265	35.8%		
Burnside	85	0.7%	483	17.5%		
Ballyrobert	65	0.6%	242	26.8%		
Dunadry	20	0.18%	190	10.5%		
Parkgate	20	0.18%	261	7.6%		
Straid	10	0.1%	154	6.4%		
Hamlets	110	1.0%	549	20%		
Countryside	670		7141	9.3%		

*Calculated using 2015-30 figures

3.2.10 The above **Tables 3** and **7** represent a more sound, sustainable and balanced split than that identified within the Draft Plan Strategy for the reasons set out below:

- The split allocated to the 5 Towns still represents c.86% of the housing growth figure as identified within the Draft Plan Strategy;
- Majority of growth is still directed towards Newtownabbey and Antrim in accordance with the Spatial Growth Strategy;
- Large percentage of growth still allotted to Antrim, in line with Policy SFG 12 of the RDS 2035 which aims to grow the population of Hubs and Cluster of Hubs;

- Allocations respect the proportionate level of housing growth within individual Villages as outlined within the Draft Plan Strategy;
- Allocations are appropriate, realistic and in conformity with the Spatial Growth Strategy of the DPS;
- Allocations remain in line with the Settlement Hierarchy identified within the DPS and as such, the role and service provision of each settlement;
- Allocations take in to account social housing need as identified by NIHE, in line with the SPPS;
- Removes the skewing effect of existing housing zonings within Ballyclare, which were previously at the expense of Crumlin and Randalstown;
- More onerous countryside policy and new hamlets considered and reflected in a reduced countryside allocation.

3.3 Changes to the Draft Plan Strategy

3.3.1 Based upon the above commentary, we respectfully suggest the following amendments are made to ensure the Plan Strategy is sound, as detailed in **Table 8**.

- *Amendment 1:* Amend allocations in Table 6 of the Draft Plan Strategy (Page 135) in line with **Table 7** above.
- *Amendment 2:* Amend Paragraph 7.10 to reference that allocations have also been informed by housing need within settlements.

Table 8: TSA suggested changes in relation to the tests of soundness

<i>Soundness Test C1 – Did the Council take account of the RDS</i>
Both amendments allow for housing need to be incorporated into housing allocations.
<i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i>
Both amendments allow for sustainable development to form the basis of housing allocations and have due regard to the SPPS.
<i>Soundness Test 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</i>
Both amendments take into consideration the NIHE Annual Housing Needs Assessment.
<i>Soundness Test CE1 – The DPD sets out a coherent strategy for which its policies and allocations logically flow</i>
Amendment 1 ensures housing allocations take cognisance and are in accordance with other policies within the Draft Plan Strategy which promote sustainable development.

<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i>
Both allocations take in to account all relevant evidence and provide realistic and appropriate alternatives.
<i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i>
Both allocations allow appropriate flexibility to enable changing circumstances, particularly housing demand and needs.

4. Policy DM 17 (DM 17.3 – Affordable Housing) and Amplification Text

4.1 Summary

- 4.1.1 We are supportive of the Council's proposed Policy DM 17.3 in respect of Affordable Housing. The threshold of 40 dwellings and a percentage of 10% is both reasonable and Sound. However, we feel the Policy amplification is not sufficiently clear and therefore Unsound as detailed in **Table 9**.

Table 9: Section 4 Summary of Relevant Soundness Tests

<i>Soundness Test CE3 – There are clear mechanisms for implementation and monitoring</i>
<p>The Policy amplification does not currently provide a clear definition of "Affordable Housing" for the purposes of Policy DM 17.3. This may result in ambiguity in respect of implementing this Policy.</p> <p>Furthermore, as detailed in Sections 2 and 3 of this response, the Council appears to be reliant on committed housing lands to deliver housing growth over the Plan period which already benefit from planning approvals or may not be available for the development of housing. Should this be the case, there will be limited scope for implementing Policy DM 17.3 and delivering affordable housing.</p>

4.2 Changes to the Draft Plan Strategy

- 4.2.1 Based upon the above consideration, we respectfully suggest the following amendments are made to ensure the Plan Strategy is sound, as detailed in **Table 10**.
- *Amendment 1:* Include a definition of Affordable Housing within the amplification text. This should include reference to social housing in order to assist delivering housing to meet housing need. Additional text should therefore read "For the purposes of Policy DM 17.3, affordable housing is taken to mean Social Rented housing and/or Intermediate Housing including Shared Ownership Housing and rent to own". Text should also be added to identify that the NI definition of intermediate housing may be further expanded in the future and where this is the case, additional products (such as Equity Loans, Affordable Rent and Discount Market Sale Housing) will be considered suitable to help meet the affordable housing obligations of this Policy in the future.
 - *Amendment 2:* Carry out amendments identified in Paragraphs 2.3.1 and 3.3.1 of this representation to ensure an appropriate level of housing lands within settlements. This will allow the implementation of this Policy over the Plan period and ensure the delivery of Affordable Housing integrated within wider housing development.

Table 10: TSA suggested changes in relation to tests of soundness

<i>Soundness Test CE3 – There are clear mechanisms for implementation and monitoring</i>
Amendment 1 will remove ambiguity when implementing Policy DM 17.3
Amendment 2 will ensure the Policy can be implemented in respect of housing development over the Plan period.

5. Ballyrobert

- 5.1 The evidence presented in **Sections 2 and 3** above identifies a potential need of 65 no. dwellings within Ballyrobert over the Plan period. Whilst Table 12 of Evidence Paper 6 – Housing identifies a potential remaining yield of 80 no. dwellings, we have previously identified a requirement to further analyse the evidence given within same. Furthermore, detailed analysis of housing land availability at September 2019, carried out by TSA, indicates that when current completions and expired permissions are taken into account, there is a remaining yield of 3 no. dwellings within the Village as evidenced at **Table 11**.

Table 11: Ballyrobert Survey – September 2019

Site ID	Site Address	Potential Units	Units Complete	Remaining Potential	Status
219780	Jubilee Drive	21	21	0	Complete
200820	Forthaven	69	69	0	Complete
220436	Earlsfort	6	6	0	Complete
211428	Adjacent to No.23 The Longshot	1	0	0	Permission Expired (U/1997/0452)
219778	56-58 Ballyrobert Road	4	0	0	Permission Expired (U/2008/0207//F)
219781	40 Mossley Road	8	0	0	Permission Expired (U/2006/0604/F)
220439	108 Ballyrobert Road	1	0	0	Permission Expired (U/2010/0098/O)
220440	107-109 Ballyrobert Road	10	0	0	Permission Expired (U/2009/0556/F)
220442	Between 43 & 47 Wesleydale	3	0	0	Permission Expired (U/2007/0305/F)
221353	73 & 75 Wesleydale	2	0	0	Permission Expired (U/2007/0305/F)
221500	Ballyrobert Manor	13	10	3	Development Ongoing

- 5.2 Additionally, we have previously explored the inconsistency between the Council stating that the housing growth figure is not a cap and the allocations provided essentially acting as a cap to housing growth. Within Ballyrobert, there has been an historic build rate of c. 10 dwellings per annum (2015-2018), indicating a high demand within the Village. The Council have

allocated 35 dwellings to Ballyrobert within the Draft Plan Strategy, however applying the rationale set out in our revised break down tables there is potential to allocate 65 no.dwellings to Ballyrobert in line with a percentage growth allowance of 0.6% (**Table 7**). The current build rate would therefore indicate Ballyrobert will reach its stated allocation within a maximum of 6 years. As the Council have previously stated that the housing growth figure is not a cap, we believe that Ballyrobert should be permitted additional housing lands to accommodate demonstratable demand. As such, an extension to the existing settlement limit will be required.

- 5.3 Whilst we appreciate that any extensions and residential designations are reserved for Local Policies Plan stage, we feel it is expedient to make the Council aware at this stage that our client is committed to bring the lands identified at **Annex 1** forward for residential development within the plan period. As such, these lands are *available* and would assist in *delivering* the minimum housing growth figure in line with Strategic Policy 4 of the Draft Plan Strategy.
- 5.4 The identified lands measure c.2.8ha and are located to the West of Ballyrobert. Fronting The Longshot as shown at **TSA 2** below. The site lies adjacent to the current settlement development limit along the eastern boundary and is bound by existing residential development at Wesleydale. Existing vegetation along the western and northern boundaries provides a natural buffer between settlement and countryside.



TSA 2: Site Location

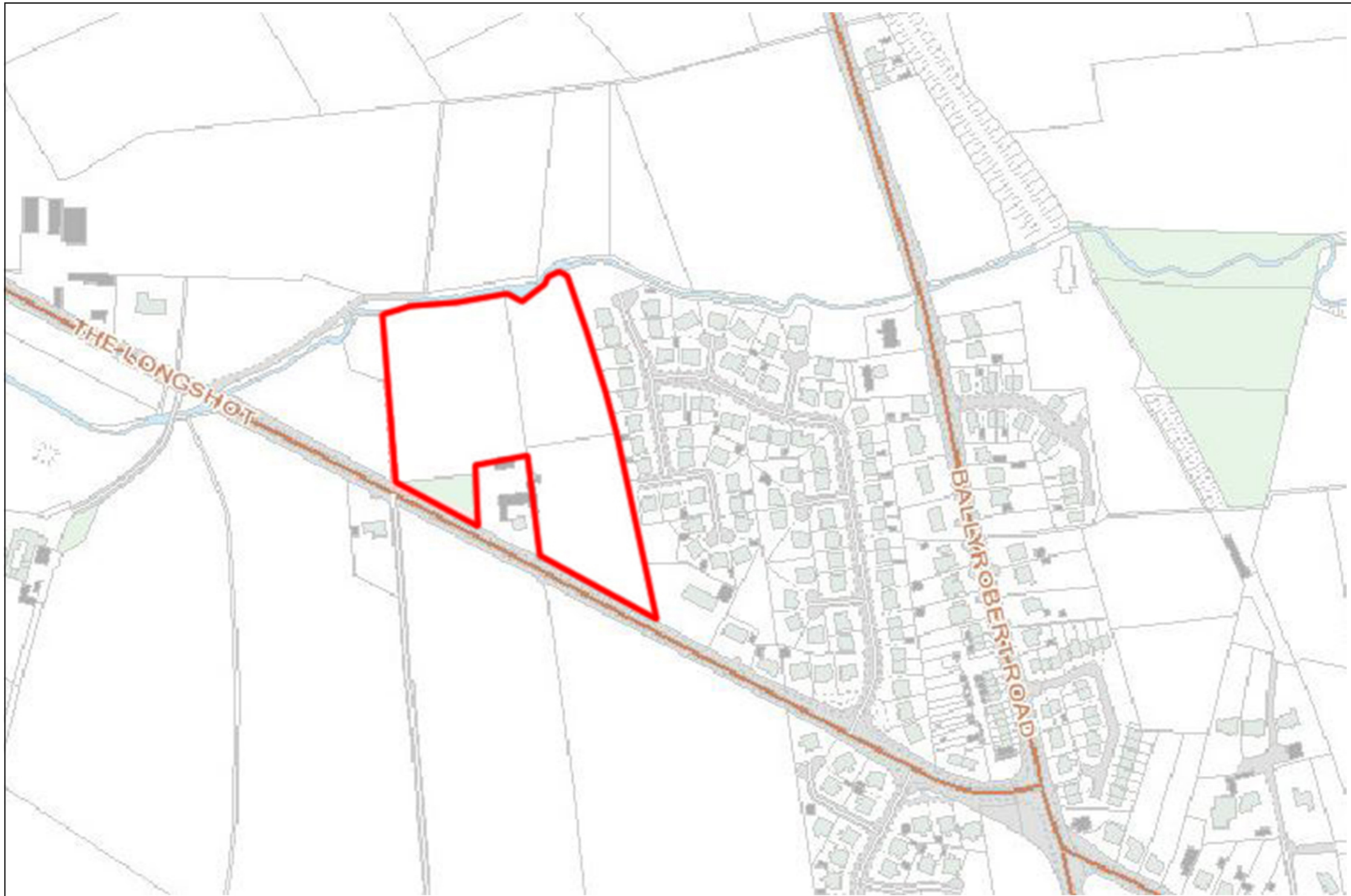
- 5.5 As such, the site represents an appropriate extension to the settlement limit as evidenced at **Annex 2**. Furthermore, this is supported by Evidence Paper 2: Settlement Evaluation, which identifies that there are no obvious development constraints to this site (Page 71).
- 5.6 For the reasons set out above, we respectfully request the Council retain **Section 5** of this representation to inform the Local Policies Plan stage, whereby the identified site would form

a natural extension to the existing settlement of Ballyrobert and assist in delivering residential dwellings to meet housing demand within the plan period.

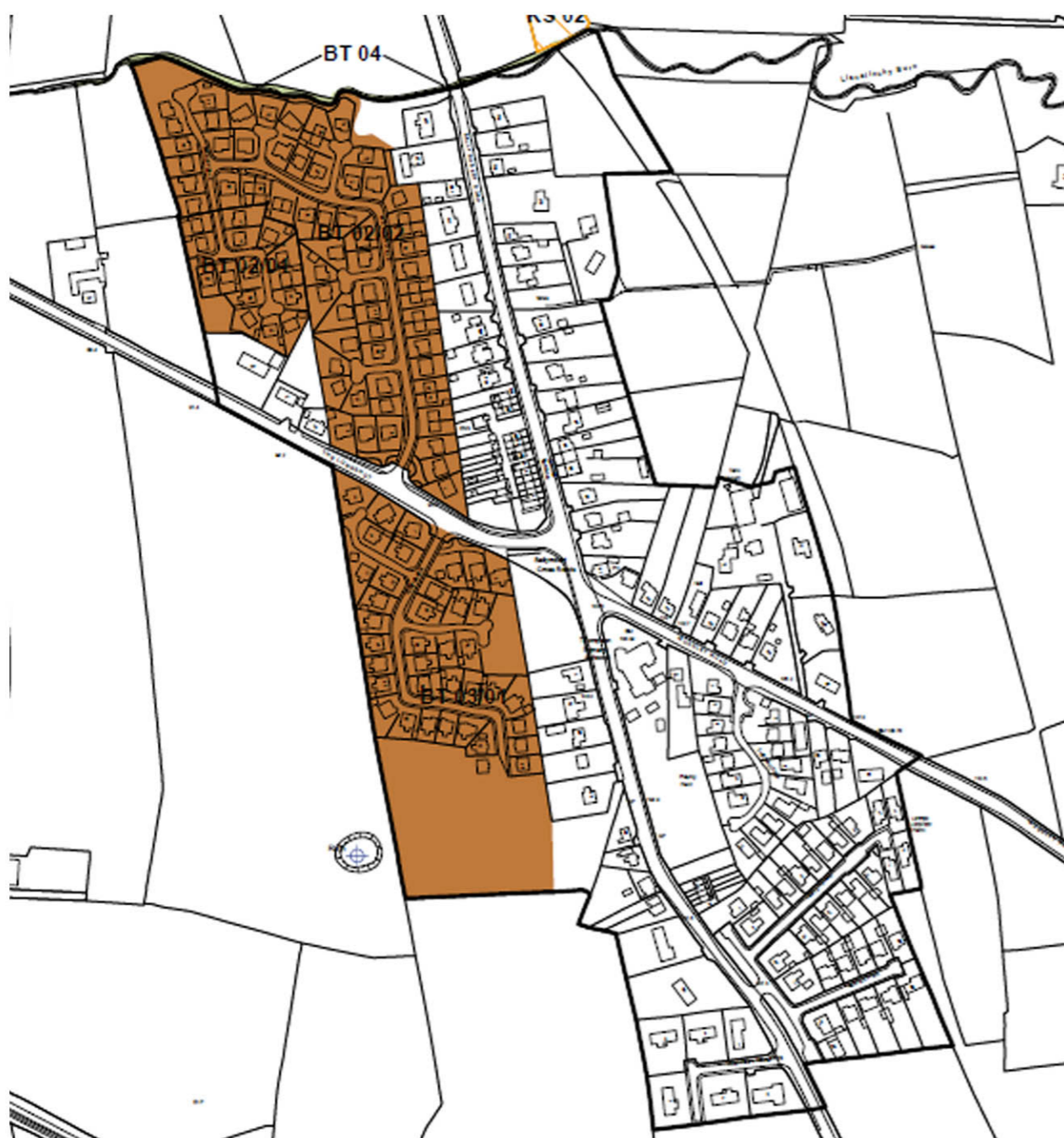
6. Conclusions

- 6.1 In conclusion, this representation has assessed the published Draft Plan Strategy in respect of Strategic Policy 4: Homes and found same to be unsound, taking in to account the soundness tests set out in Development Plan Practice Note 6 – Soundness.
- 6.2 The representation has analysed the overall Housing Growth Figure and identified this should be increased to a figure of 11, 050 in order to accord with the LDP timetable and allow reasonable flexibility to deal with a change in circumstances.
- 6.3 The allocation of housing growth between individual settlements has been reconfigured to take due consideration of planning policy, the Draft Plan Strategy and the promotion of sustainable development.
- 6.4 For the reasons set out within this representation we respectfully request the stated amendments are supported and brought forward within the adopted Draft Plan Strategy.
- 6.5 Additionally, whilst we appreciate that any extensions and residential designations are reserved for Local Policies Plan stage, we respectfully request the Council retain **Section 5** of this representation to inform the Local Policies Plan stage, whereby the identified site would form a natural extension to the existing settlement of Ballyrobert.

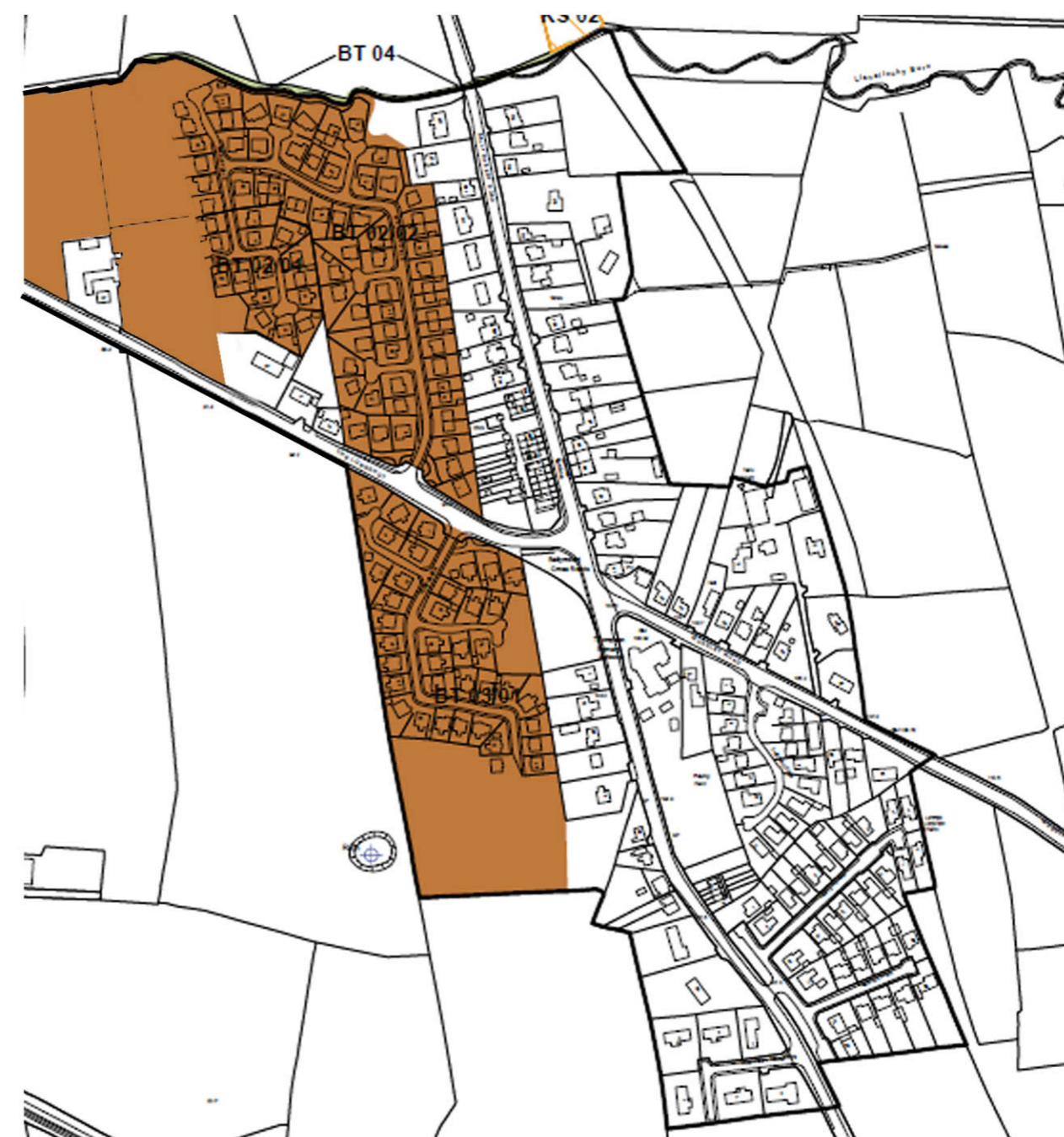
Annex 1
Site Location Plan



Annex 2
Proposed Local Development Plan



Existing Development Limit



Proposed Development Limit