

Submitted to **Local Development Plan 2030 - Draft Plan Strategy Representations**  
Submitted on **2019-09-20 16:56:17**

## SECTION A - DATA PROTECTION AND CONSENT

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

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

Yes

## SECTION B - CONTACT DETAILS

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

**Respondent Type:**

I am an Agent

Please specify your contact details:

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**Last name:**

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**Job Title (where relevant):**

**Organisation Name (where relevant):**

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**Please Read Before Continuing. . .**

## SECTION C - REPRESENTATIONS

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

I consider it to be 'Unsound'

### Unsound Representation

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

**Paragraph Number in Document:**

Various

**Policy Heading:**

Various

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

SP4

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

**Page Number In Document:**

134/135

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

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

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?, 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?

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

**Unsound Justification:**

See attached

**Upload File:**

CRUMLINLDPA&NBC- behalf of CHL .docx was uploaded

**Modifications**

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

**Modifications:**

See attached

**File Upload:**

CRUMLINLDPA&NBC- behalf of CHL .docx was uploaded

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

Oral Hearing

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

No

**Local Development Plan 2030 (Draft Plan Strategy  
A&NB Council (26.07.19 - 20.09.19)**

**WRITTEN REPRESENTATIONS**



**ON BEHALF OF CHL**

Prepared by:

WPB Ltd

Ref: Pre-Consultation DPS

Date: September 2019

Ref:

In connection with the provision of written representations on the Antrim & Newtonabbey Borough Council Local Development Plan (Draft Plan Strategy, September 2019).

**Land at Glenavy Road, Crumlin  
BA3 2BE (SSV1/2/4)**

**20/09/201**

LPA Ref: Strategic Policies 1, 2, 4, 5  
Our Ref: documents/sept2015CRUMLINLDPA&NBC/ behalf of CHL.docX

Submission Date: Sept 20 2019

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## APPENDICES

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## 1. INTRODUCTION

These written representations on the Draft Local Plan Strategy (DPS) are presented on behalf of landowners at Crumlin (CHL).

The main objective of these representations is to highlight inconsistency concerns relating to the *Regional Development Strategy 2035* and the soundness of the DPS. The representations question the requirement for a more robust evidence base for existing housing and employment allocations based on the consideration of other alternatives (*Consistency /Coherence and Effectiveness Test CE1*). This submission also makes a specific recommendation for increased levels of housing in the settlement of Crumlin during the plan period to 2030. This adjustment is suggested to maximise its future potential for sustainable growth based on the Housing Evaluation Framework set out in the Regional Development strategy.

The recommendation over the allocations in Strategic Policy 4 is also based upon a review of need identified, in the Housing Needs Assessment/Housing Market Analysis when allocating housing land, including land for social and intermediate housing such as shared ownership and affordable housing. Details of a specific housing site are provided to demonstrate Crumlin's potential to accommodate future outward growth based on suggested housing levels without significant environmental degradation.

## 2. GENERAL

DPS 2035 recognises that a key step in this housing allocation process is making judgements to achieve a complementary urban/rural balance to meet the need for housing in the towns of the district and to meet the needs of the rural community living in smaller settlements and countryside. This recognition is not evident in the DPS the Spatial Growth Strategy or the earlier POP review stage.

The DPS instructs that the plan making process should also take account of need identified, in the Housing Needs Assessment/Housing Market Analysis when allocating housing land, including land for social and intermediate housing such as shared ownership and affordable housing. The key assumptions underpinning the allocation of housing growth 2015 to 2030 to each settlement are not clear from the supporting information to the DPS (*Evidence Paper 6*).

It appears that levels have been set broadly in accordance with the RDS 2030 although the disaggregation to individual settlements is not fully justified. Whilst an estimate of new dwelling requirement is set out in Appendix B of the RDS 2035 the figures should not be seen as a rigid framework but as guidelines for local planning.

Based upon Table 3.2 of the RDS 2035 the settlement of Crumlin would be likely to score highly for its size when assessed against the No.6 tests. This in turn would appear to justify marginally higher levels of housing growth.

At present there is no evidence of the application of these tests by A& NBC. Whilst Table 3.2 is a broad evaluation framework it would suggest that additional levels of growth are warranted.

In these circumstances the proposed housing levels to 2035 do not appear as a coherent strategy of policies and allocations that logically flow from a robust evidence base (*Coherence and Effectiveness Test CE1*). Detailed settlement assessments of environmental capacity testing were not available at this stage. Similarly Transport, U&R Character CS, ED & Resource Tests were not available.

In accordance with related guidance Crumlin should be allowed to fulfill its role in maintaining a strong network of service centres sustaining rural communities across rural Northern Ireland. This is in accordance with the vision and guiding principles set out in the Regional Development Strategy. This raises questions over the coherence and effectiveness tests.

### 3. SETTLEMENT SPECIFIC COMMENTS

Crumlin is a mid sized town (Pop 5,140) and as such it already serves an important role in supporting economic growth as a place to invest, live and work.

The town currently has a significant range of services and facilities supporting an extended rural hinterland. This correlation is noteworthy in that levels of community infrastructure reflect the combined size of the town and its rural hinterland rather than what its core population would normally dictate.

Significant investment commitments over employment, housing, transport and community infrastructure have already been made at Crumlin to service its growing population. The proposed road linking the most recent housing areas between Lurgan Road and Cidercourt Road is in the process of being delivered by committed developments. Further highway improvements including improvements to the Nutts Corner road interchange could be provided under future planning obligations.

Improved connectivity with Antrim and Belfast will ensure that a healthy community at Crumlin is well placed to support the network of towns and their associated hinterlands. The Spatial Development Strategy shows that Crumlin is crucially located on a key transport corridor within Belfast Metropolitan area. Crumlin's geographic location also means that its continued expansion would be entirely consistent with the objectives for the main hubs of Ballymena, Larne and Antrim cluster recognized in the RDS 2035.

The RDS recognises that there is a need to understand the role and function of settlements like Crumlin and their role in serving rural communities and the importance of promoting co-operation between places. The RDS encourages clustering of towns and cities so that services can be shared and do not need to be duplicated. It identifies those settlements within close proximity to each other which have the potential to cluster.

The RDS seeks to influence the future distribution of development throughout the region and in doing so it identifies the Crumlin area and other areas of Newton abbey as part of the Belfast Metropolitan Area Urban Area where significant investment should be targeted.

Potential use of the Non-Operational Railway Line and improved links to the

Belfast International Airport area also offer a significant and ongoing opportunity for the future of Crumlin. Crumlin is already acknowledged in the DPS to be well positioned in terms of Belfast International Airport and its surrounding hinterland which serves as one of the busiest gateways or interchanges in Ireland. This ongoing opportunity has had key implications for economic development in the Crumlin area not least in terms of existing and future employment generation. Economic growth should be matched with housing growth to improve the overall sustainability of the Crumlin settlement.

Although the current strategy distinguishes the existing strategic employment location on the edge of the settlement (Nutts Corner) from its town centre all sites form part of an extended employment base serving Crumlin.

Table 6 in Strategic Policy 4 (SP4.3) shows a growth allocation of 350 homes to Crumlin in the plan period to 2030.

However to maintain social cohesion and fulfillment of role as a Service Centre it is our contention that additional housing growth will be essential to ensure that the acknowledged relationship between settlement size and the levels of service is maintained. Policy RG7 of the RPG recognises the benefits of such approach for strengthening community cohesion (Strategic Objective 8 DPS) and should be therefore be fully recognised in the strategy for the DPS.

An additional 150 dwelling allocation (500 houses to 2030) should be provided within the plan period to maintain the role of Crumlin. Based upon a review of need identified, in the Housing Needs Assessment/Housing Market Analysis this would provide a level sufficient to allow for expected housing needs over the Plan period and to give a degree of flexibility over the choice of sites.

Further growth will serve to encourage sustainable economic growth including additional town centre shopping, commercial and entertainment/recreational uses.

Initial studies suggest that suggested levels of additional housing growth envisaged in Crumlin could also take place without causing unacceptable damage to the local character and environmental quality or residential amenity of the settlement. This extended level of opportunity to promote community coherence is overlooked in the current DPS.

#### 4. OTHER MATERIAL CONSIDERATIONS

Details of the location of a potential housing site fronting on to Glenavy Road are provided in Appendix 2. Based on existing housing commitments and emerging site opportunities in Crumlin (See Appendix 2) the settlement has the potential to accommodate future outward growth utilising based on suggested housing levels without significant environmental degradation.

The POP assessment acknowledged that the role of Crumlin should develop from position endorsed in the Antrim Area Plan (1984 - 2001) when 45 hectares of land was identified for development. In this regard the dismissal of Preferred Option 1 at the POP stage is fully supported. The reclassification of settlements under Preferred Option 2 does not however recognise that the population of Crumlin is at the margin of the threshold set down in the RDS 2035 (6,000). This should be acknowledged in the revised settlement hierarchy and corresponding allocation recommendations.

As acknowledged in the POP report Preferred Option 2 for housing does not take account of the key differences in the three towns of Ballyclare, Randlestown and Crumlin. The current DPS could be refined to reflect this based on the Table 3.2 tests in the RDS 2035.

## 5. CONCLUSIONS

In short the DPS does not enable the town of Crumlin to maximise its future potential and this is contrary to the expressed aim of the RDS 2013 and previous iterations of the regional strategy (Shaping the Future RDS 2025).

In accordance with related regional guidance Crumlin should be allowed to fulfill its role in maintaining a strong network of service centres sustaining rural communities across rural Northern Ireland. This is in accordance with the vision and guiding principles set out in the Regional Development Strategy. In these circumstances this raises questions over the coherence and effectiveness tests.

Strategic Policies in the DPS should manage housing growth in response to changing housing need and direct future housing growth to settlements like Crumlin to achieve more sustainable patterns of residential development.

The RDS should inform the spatial strategies of all local development plans. It calls for an adequate supply of land to facilitate sustainable economic growth together with a balanced approach to transport infrastructure.

The DPS should seek to maximise the use of existing infrastructure and service development based on increased catchment populations to enable the evolution of settlements like Crumlin which are safe and inclusive and offer equality of opportunity. Crumlin therefore needs to extend its existing population base in accordance with the expressed objectives of RDS 2030.



## Appendix 1 – Extracts Regional Development Strategy 2035



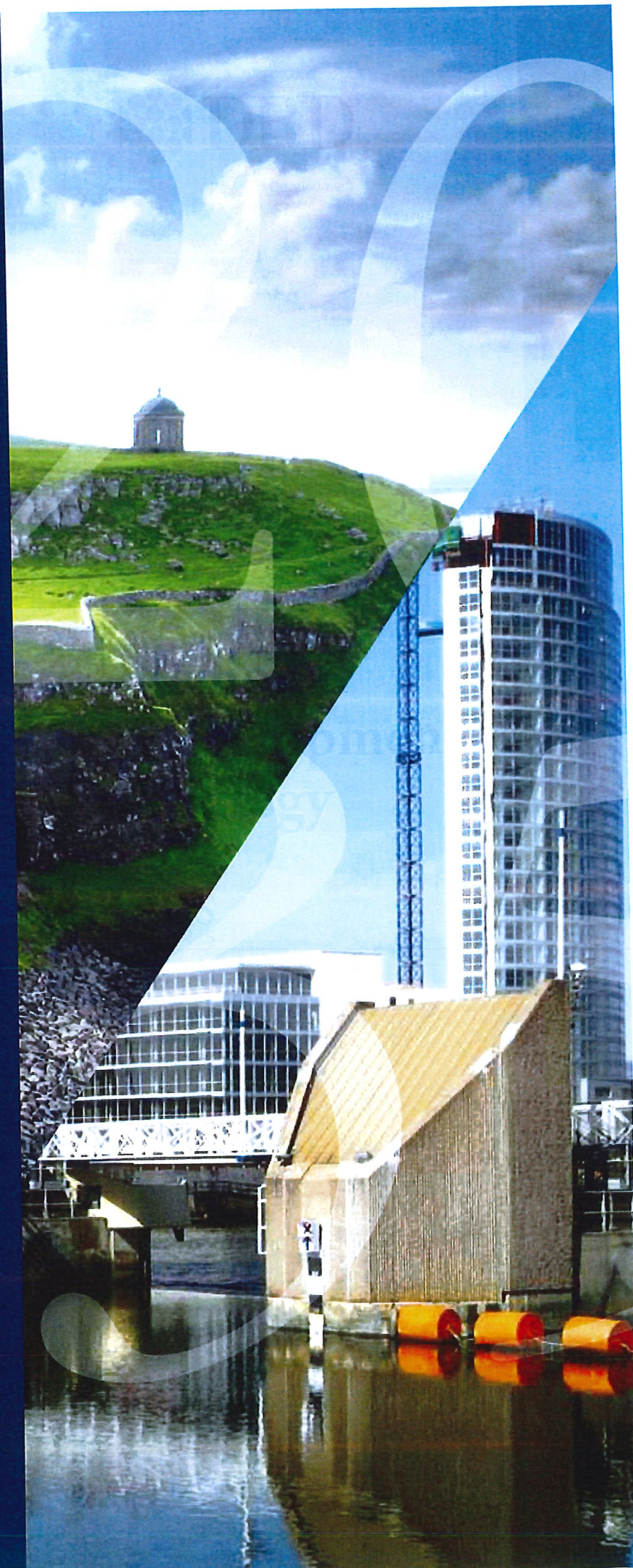


Department for  
Regional Development  
[www.drdni.gov.uk](http://www.drdni.gov.uk)

# Regional Development Strategy

RDS  
2035

*Building a Better Future*





## Society

3.9 Sustainable communities are places where people want to live, work and play, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all.

3.10 The guidance in this section supports the aims of 'A Shared Future' published by the office of the First Minister and Deputy First Minister in March 2005.

### RG6: Strengthen community cohesion

3.11 An integrated and cohesive community is one where people from different backgrounds have similar life opportunities and people know their rights and responsibilities. These are places where there is a sense of belonging for everyone and relationships between people from different backgrounds are positive and differences are valued. The right environment can help strengthen community cohesion, foster a stronger community spirit and increase our sense of place. The village concept is important for both rural and suburban areas as it can bring people together and strengthen communities by sharing a sense of place and identity.

- **Develop integrated services and facilities.** This will enable people to meet and undertake shared activities whilst ensuring there are no barriers, perceived or physical, to access these places.
- **Foster a stronger community spirit and sense of place.** Encourage community participation in the planning process to reinforce a sense of belonging and place.
- **Encourage mixed housing development.** Neighbourhoods with homes in a range of sizes and tenures will allow heterogeneous populations to live together. Diverse populations lead to more stable communities and can help reduce social isolation.

### RG7: Support urban and rural renaissance

3.12 Many places do not offer the quality of facilities required to meet the needs of local people. Cities, towns, villages and many neighbourhoods have unique identities and these should be recognised and built upon and enhanced. Regeneration is necessary to create more accessible, vibrant city and town centres which offer people more local choice for shopping, social activity and recreation.

3.13 Urban renaissance is the process of development and redevelopment in urban areas to attract investment and activity, foster revitalisation and improve the mix of uses. Rural renaissance likewise is about revitalising the centres of small towns and villages so that they meet the immediate needs of the communities they serve. Redevelopment can include the reuse of both Listed Buildings and of locally important buildings, particularly the reuse of vernacular buildings and industrial heritage buildings/structures. Development is dependant upon the availability of necessary infrastructure, including water and sewerage infrastructure but should avoid, where possible, areas that are at risk of flooding from rivers, the sea or surface water run-off.

3.14 In some places community division has created areas and interfaces where businesses are reluctant to invest. Economic deprivation leads to environmental problems characterised by derelict buildings and undeveloped sites. It is important to promote a joined up approach to support urban and rural renaissance to ensure all stakeholders are involved.

- **Develop innovative ways to bring forward under-utilised land and buildings, particularly for mixed use development.** There should be a focus on integrating new schemes within the existing townscape. The sensitive design of interfaces and access arrangements can allow a wide range of uses to co-exist peacefully. Mixed use developments can play a very important role in helping to regenerate and revitalise a declining area.
- **Promote regeneration in areas of social need.** Development initiatives should target areas that suffer low employment and high deprivation.
- **Ensure that environmental quality in urban areas is improved and maintained, particularly with adequate provision of green infrastructure.** Part of the process of urban and rural renaissance requires even greater significance being given to the design and management of the public realm. It is important to promote recreational space within cities, towns and neighbourhoods, and new developments or plans should make provision for adequate green and blue infrastructure. This is particularly important near designated nature-conservation sites as it will help reduce recreational pressure on these sites.
- **Reduce noise pollution.** Noise levels which are above comfort levels can be caused by traffic, construction, industrial, and some recreational activities. It can aggravate serious direct, as well as indirect, health effects. When new developments or plans are being prepared it will be important to take into consideration the European Noise Directive which aims to avoid, prevent or reduce, on a prioritised basis, the harmful effects of noise.



## **RG8: Manage housing growth to achieve sustainable patterns of residential development**

3.15 The varied housing needs of the whole community need to be met. This includes the availability of affordable and special needs housing. Housing is a key driver of physical, economic and social change in both urban and rural areas. Strategic planning places emphasis on the importance of the relationship between the location of housing, jobs, facilities and services and infrastructure. This includes the need for development patterns that do not have an adverse impact on environmental resources and the built heritage and which mitigate the risk of flooding by avoiding those areas known to be at risk.

3.16 The emphasis is on managing housing growth to ensure that there continues to be a focus on developing more high quality accessible housing within existing urban areas without causing unacceptable damage to the local character and environmental quality or residential amenity of these areas. It is recognised that there are significant opportunities for new housing on appropriate vacant and under-utilised land, particularly as part of mixed use developments. Any proposed housing development will be dependant on the availability of all necessary infrastructure, including the availability of sustainable water resources and sewerage capacity.

3.17 This Strategy sets a regional target of 60% of new housing to be located in appropriate 'brownfield' sites within the urban footprints of settlements greater than 5,000 population. The glossary defines both 'brownfield' and 'urban footprint'.

3.18 The Department for Regional Development will carry out research on housing development on brownfield land and will develop its monitoring of housing within urban footprints.

3.19 There is no presumption that brownfield land is necessarily suitable for housing development or that the whole of the curtilage should be developed. Planning Policy Statement 7 'Quality Residential Environments' and the Addendum 'Safeguarding the Character of Established Residential Areas' set out policy for appropriate housing in settlements.

- **Promote more sustainable housing development within existing urban areas.**  
It is important to ensure that the future housing needs in Northern Ireland does not use a disproportionate amount of regional resources including infrastructure, services, industrial and agricultural land. This requires a two-pronged balanced

approach of encouraging compact urban forms, and promoting more housing within existing urban areas. This should support urban renaissance and investment in the clusters of main towns whilst conserving town settings and saving and concentrating resources. This will also mean more urban housing by recycling land and buildings and making use of other suitable sites thereby reducing the use of greenfield land.

- **Ensure an adequate and available supply of quality housing to meet the needs of everyone.** Housing land will be identified in development plans. Planning authorities should take account of existing vacant housing in any assessment of housing need. They should also take account of need identified, in the Housing Needs Assessment/Housing Market Analysis when allocating housing land, including land for social and intermediate housing such as shared ownership and affordable housing. An estimate of new dwelling requirement is set out in Appendix B.
- The figures in Appendix B, Table B2 are not to be seen as a rigid framework but as guidelines for local planning. The distribution across council areas reflects what might be required to achieve the policy objectives of strengthening Belfast as the regional economic driver and Londonderry as the principal city of the North West. They are not based purely on past trends of population movement.
- While the figure is for the whole council area, it is recognised that a proportion of this figure will be built in the open countryside and will depend on the application of PPS 21 "Sustainable Development in the Countryside". The delivery of any housing will be dependent on the availability of water resources and sewerage capacity.
- **Use a broad evaluation framework (Table 3.2) to assist judgements on the allocation of housing growth.**



**TABLE 3.2: Housing Evaluation Framework**

|                                       |   |
|---------------------------------------|---|
| <b>Resource Test</b>                  | Studies should be carried out to assess and detail the existence of community assets and physical infrastructure such as water, waste and sewage, including spare capacity.   |
| <b>Environmental Capacity Test</b>    | An assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made. |
| <b>Transport Test</b>                 | Studies should be carried out to assess the potential for integrating land use and public transport and walking and cycling routes to help reduce reliance on the car.  |
| <b>Economic Development Test</b>      | The potential to facilitate an appropriate housing and jobs balance and to unlock any major strategic development opportunities should be assessed and detailed.  |
| <b>Urban and Rural Character Test</b> | Assessment should be made of the potential to maintain a sense of place, and to integrate new development in a way that does not detract from the character and identity of the settlement.   |
| <b>Community Services Test</b>        | The potential to underpin and, where necessary, reinforce the community service role and function of the settlement should be assessed and detailed.  |

3.20 The regional housing figure was allocated on a 52/48% split between the North/South and West of the Region and the BMUA districts and hinterland in order to help achieve balanced regional development. These figures are not to be seen as a rigid framework but as guidelines for local planning. The distribution across council areas reflects what might be required to achieve the policy objectives of strengthening Belfast as the regional economic driver and Londonderry as the principal city of the North West and is not based purely on past trends of population movement

3.21 The allocation of housing growth to specific locations in a district is a matter for decision through the development plan process. In the allocation process due weight needs to be given to reinforcing the leading role of the Hubs and the clusters of Hubs. Another important step in this allocation process is making judgements to achieve a complementary urban/rural balance to meet the need for housing in the towns of the district and to meet the needs of the rural community living in smaller settlements and countryside.



## Environment

3.22 Improving the quality of the environment can make an important contribution towards achieving a better quality of life. Significant progress towards more sustainable settlements and the conservation and protection of our built and natural heritage cannot be achieved without a change in attitudes and lifestyles of individuals.

3.23 Fossil fuels represent over 90% of the Northern Ireland's power generation and over 70% of households still use oil for home heating. Increasing the contribution that renewable energy can make to the energy mix will reduce reliance on fossil fuels and improve security of supply. To build an outward-looking, dynamic and liveable Region there needs to be significant investment in upgrading the electricity infrastructure, developing the natural gas network and exploring the potential to develop a renewable heat generation and distribution network. Transportation currently accounts for a quarter of the man-made greenhouse gas emissions. It is also the only sector where emissions are rising rather than falling. In order to address this we need to promote ways to make the most efficient use of our infrastructure so that we can move people and freight safely and reliably while also reducing pollution.

**RG9: Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality.**

3.24 Climate change is increasingly seen as one of the most serious problems facing the world. Air pollution from particulate matter is currently estimated to reduce the life expectancy of every person in the UK by an average of 7-8 months. The young and infirm are often particularly affected, as well as people living in deprived areas. In addition, emissions of sulphur ( $\text{SO}_2$ ), nitrogen ( $\text{NO}_x$ ) and ammonia ( $\text{NH}_3$ ) can be deposited on land and water causing either acidification, or nutrient enrichment (eutrophication). Whilst action is required internationally, it is important that Northern Ireland plays its part by reducing air pollution and greenhouse gas emissions and preparing for the impacts of climate change. These include the effects on species and habitats and on health as a result of warmer temperatures, storms, floods and coastal erosion.

3.25 Consideration needs to be given on how to reduce energy consumption and the move to more sustainable methods of energy production. The use of fossil fuels and greenhouse gas emissions can be reduced by recycling waste and recovering energy from it.

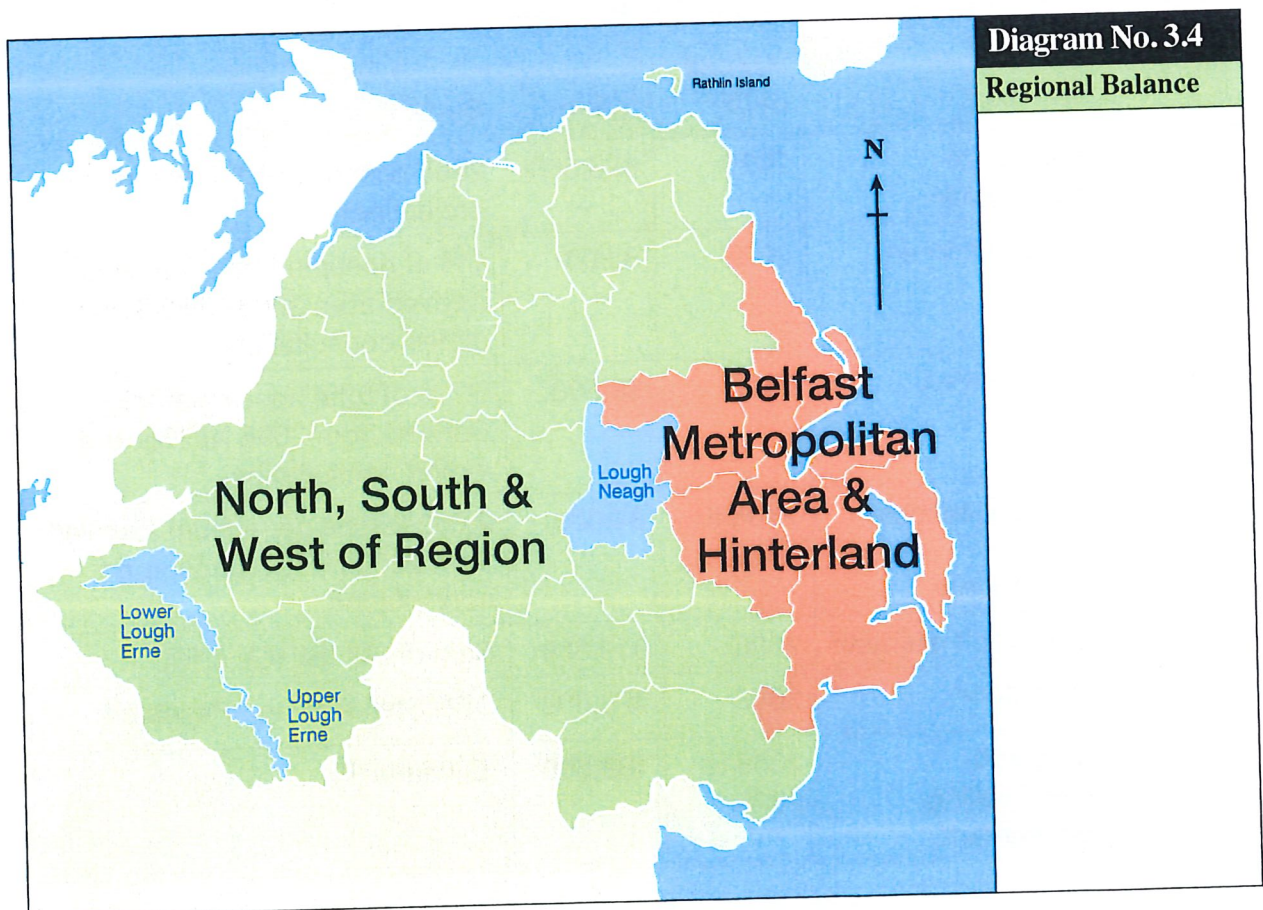


## Appendix B

### Housing

One of the aims of the previous RDS was to maintain a balance of growth between the BMUA and its hinterland and the rest of the region. It therefore proposed that the distribution of future housing provision should be 52% in North, South and West of the region and 48% in the BMUA districts and hinterland.

The actual number of houses built over the 10 years between March 1998 and March 2008 was 131,554. The distribution was 57% in North, South and West with the remaining 43% in the BMUA districts and hinterland. It is not surprising that the 52/48 split was not achieved as many extant development plans pre-date the guidance.



**Housing Growth Indicators (HGI)s** have been produced as a guide for those preparing development plans. The figures are an estimate of the new dwelling requirement 2008-2025 for each of the existing 20 District Councils outside the BMUA and its hinterland and for the 6 BMUA Council areas. It is considered appropriate to maintain the previous 52/48 split given the objectives of this RDS and the timeframe for preparation of development plans.

The starting point for the 2008-2025 set of HGI)s is the previously published 1998-2015 figures. The total requirement over that 17 year period was 208,000. This was derived from examining household projections, existing stock, vacancies etc.

The total requirement for the period 2008-2025 was calculated on the same basis as for 1998-2015 as described in Appendix 3 of the Review of the Regional HGI)s consultation document published in January 2005 but with updated data (see table B1). This total was rounded up to the nearest 1,000 houses and then distributed in the same proportions as those used for 1998-2015 HGI)s. The result is set out in table B2.

**Table B1: Estimate of total housing need 2008-2025**

|     | Variable                               | Year of data | Value          | Source   |
|-----|--|--------------|----------------|--|
| (A) | Number of households                   | 2025         | 826,500        | 2008 based NISRA household projections   |
| (B) | Second homes                           | 2025         | 8,300          | 1% of occupied housing stock. Derived from 2006 NIHCS and expert consultation. |
| (C) | Vacant stock                           | 2025         | 50,500         | 5.7% of total housing stock. Derived from 2006 NIHCS and expert consultation.  |
| (D) | Net conversions/ closures/ demolitions | 2008 to 2025 | 34,000         | 2,000 losses per annum. Derived from 2006 NIHCS and expert consultation.       |
| (E) | New stock estimate                     | 2025         | 919,300        | Sum of (A), (B), (C), & (D)  |
| (F) | Total stock                            | 2008         | 729,800        | DSD Statistics and Research  |
| (G) | Projected new dwelling requirement     | 2008 to 2025 | <b>189,500</b> | (E) minus (F)  |



**Table B2 Housing Growth Indicators 2008-2025**

|                             | HGI           |
|-----------------------------|---------------|
|                             | 2008-2025     |
| BMUA                        | 50100         |
| BMUA Rural Hinterland       | 10700         |
| <b>BMUA Districts Total</b> | <b>60800</b>  |
| Antrim                      | 7300          |
| Ards                        | 9600          |
| Down                        | 9600          |
| Larne                       | 3900          |
| Armagh                      | 5500          |
| Ballymena                   | 6400          |
| Ballymoney                  | 3500          |
| Banbridge                   | 5500          |
| Coleraine                   | 6900          |
| Cookstown                   | 3700          |
| Craigavon                   | 10300         |
| Derry                       | 13700         |
| Dungannon                   | 5000          |
| Fermanagh                   | 6800          |
| Limavady                    | 3900          |
| Magherafelt                 | 4600          |
| Moyle                       | 1800          |
| Newry and Mourne            | 11200         |
| Omagh                       | 6100          |
| Strabane                    | 3900          |
| <b>Regional Total</b>       | <b>190000</b> |

## Housing Need Assessment

The Northern Ireland Housing Executive is moving to a system of Housing Market Analysis that will aim not only to identify social housing need but also to provide a solid evidence base on which available land can be zoned for housing by planners. There is a growing consensus that there needs to be a broader approach to assessing housing need; one that aims to understand the workings of the wider housing market and that will look holistically at infrastructure, planning, the socio-economic context, regeneration needs, health, education etc.

Councils will be able to use the Housing Growth Indicators as baselines or starting points which can subsequently be adjusted in the light of the Housing Market Analysis for their area.

The new Housing market Analysis will help to develop a comprehensive evidence base to inform decisions about the policies required in housing strategies and the development of area plans. It will assist policy development, decision-making and resource allocation by:

- enabling the appropriate authority to develop long-term strategic views of housing need and demand to inform housing strategies and development plans;
- enabling planners to think spatially about the nature and influence of the housing market in respect to their local area;
- providing robust evidence to inform policies aimed at providing the right mix of housing across the whole housing market (both market and affordable housing);
- providing evidence to inform policies about the level of social and affordable housing required, including the need for different types and sizes of social and affordable housing;
- supporting authorities to develop a strategic approach to housing through consideration of housing need and demand across all housing sectors and assessment of the key drivers and relationships within the housing market; and
- drawing together the bulk of the evidence required for authorities to appraise strategic housing options including housing supply targets, social housing allocation priorities, the role of intermediate housing products, stock renewal, conversion and transfer.

The Housing Executive has already developed functional boundaries for functional housing market areas in Northern Ireland and future area plans/strategies are likely to be based on these areas. These functional boundaries are based on the principle of self-contained socio-economic areas and will not be exactly co-terminous with the new



district council administrative boundaries. As such, new councils will need to work closely together when making strategic planning decisions.

### **Urban/rural balance**

Between 2001 and 2008 the population of Northern Ireland increased by 5.1 per cent however the growth was unevenly distributed. The fastest growing areas tended to be located in suburban areas within commuting distance of major urban centres. There was a shift from the most densely-populated urban areas of Belfast and Londonderry. Large, medium and small towns grew slightly faster than the NI average. The fastest rates of growth were seen in villages (+13 per cent) and intermediate settlements (+11 per cent). Small villages, hamlets and open countryside areas registered growth of 9 per cent on average.

An important step in the development plan process is allocating land for housing use. In this process judgements will be made to ensure that a complementary urban/rural balance is achieved having regard to the population growth patterns in the range of settlements within the plan area and the need to reinforce the Hubs and clusters of Hubs. Table B3 will be of assistance when making this judgement.

**Table B3 District Population Balance comparison 2008 with 1998**

| District         | District Pop 2008 | Principal Urban Centre | Pop 2008 | % District Population in urban centre 2008 | % District Population in urban centre 1998 |
|------------------|-------------------|------------------------|----------|--|--|
| Craigavon        | 90843             | Craigavon              | 65136    | 72   | 68   |
| Larne            | 31292             | Larne                  | 18323    | 59   | 58   |
| Ballymena        | 62738             | Ballymena              | 29782    | 47   | 49   |
| Coleraine        | 57006             | Coleraine              | 24455    | 43   | 42   |
| Antrim           | 53243             | Antrim                 | 21819    | 41   | 45   |
| Omagh            | 52115             | Omagh                  | 21297    | 41   | 43   |
| Limavady         | 34117             | Limavady               | 12669    | 37   | 37   |
| Ards             | 77614             | Newtownards            | 28437    | 37   | 38   |
| Strabane         | 39614             | Strabane               | 13875    | 35   | 34   |
| Ballymoney       | 30106             | Ballymoney             | 10355    | 34   | 34   |
| Banbridge        | 46966             | Banbridge              | 15989    | 34   | 37   |
| Moyle            | 16876             | Ballycastle            | 5480     | 32   | 28   |
| Cookstown        | 35944             | Cookstown              | 12006    | 33   | 34   |
| Newry and Mourne | 97289             | Newry                  | 29946    | 31   | 34   |
| Armagh           | 58173             | Armagh                 | 15020    | 26   | 28   |
| Dungannon        | 55386             | Dungannon              | 14380    | 26   | 23   |
| Fermanagh        | 61966             | Enniskillen            | 13757    | 22   | 22   |
| Magherafelt      | 43844             | Magherafelt            | 8881     | 20   | 20   |
| Down             | 69816             | Downpatrick            | 10737    | 15   | 17   |

Average % of district population in principal urban centre

37%

36%

Does not include BMUA or Londonderry

Source 2008 Mid Year Estimates and DRD estimates

## Appendix 2 – Example of Additional Housing Site/s at Crumlin (NCC)

**WPB  
Initial Planning Assessment**

**PROJECT NAME: LAND AT GLENAVY ROAD, CRUMLIN BT29 4LA**

|                              |  |
|------------------------------|--|
| Proposal:                    | <p>Outline residential planning consent involving mix of market and social housing (Circa 120 dwellings) and associated car parking, landscaping and infrastructure improvements</p> <p>Application for outline planning to cover 'Access', 'Scale' 'Layout' with some matters reserved ('Appearance' &amp; 'Landscaping').</p>  |
| Environmental Assessment     | <p>Explicit assumption has been made that an EIS would be prepared based upon size of site ('<i>major development</i>'), quantum of proposed development and the nature of related impacts/constraints. Scoping to determine specific content of EIS (WPB).</p>  |
| Key Planning Considerations: | <p>Indicative Housing Layout incl. potential 20% Social Housing</p> <p>Acceptable levels of traffic generation/Network assessment with potential improvements.<br/>Tangible planning benefits incl. Improved Town centre pedestrian linkages.</p> <p>No constraints following Protected Species (Bats) / Ecology Mitigation/ Pt 1 Completed Assessment of background Noise levels (Adjacent road/railway line.acoustic assessment) FRA GIS Heritage Evaluation.</p> <p>S106 contributions (i.e. provision of infrastructure including road improvements &amp; social housing). Off site works via S106 Agreement &amp; social housing by planning condition.</p> |



|                       |  |
|-----------------------|--|
| Key Decision Makers : | <p>Antrim &amp; Newtownabbey Borough Council<br/>(Development Management) Team</p> <p>Dev Control<br/>Local Plans<br/>Conservation<br/>Planning Policy<br/>Rivers Agency<br/>Economic Dev<br/>Democratic Services</p> <p>Local Parish Council/District Members</p> <p>Statutory Agencies (Historic Environment<br/>Division Belfast), Environment Agency<br/>Ecology</p> |
| Surveys               | <p>Scoping Opinion A&amp;NBC<br/>Topographical for indicative design<br/>scheme</p> <p>First set of key surveys including<br/>Archeology, Ecology (Pt1), Highways,<br/>Landscape FRA GIS (See Full Listing<br/>below) by end of September 2019.<br/>Local Validation Checklists (A&amp;NBC)</p>  |

### Application Fee

Outline @ range of No. 2-3-4 residential units

Exceeds 2.5 ha = £11,432

& every 0.1ha over this figure

multiply by £138 = £3,256

(Max Fee £150K)

Legal Transfer Fees

£14,688

£ 000

Estate Agency (Sales/commission)

£,000

Consultation/Third Party Liaison-

£,000

Sales consultancy

£xx,000

**Estimated Total**

**£xxx,000**

#### Notes

§ Planning strategy assumes both promotion through local planning process and earliest submission of outline planning application and related tasks including pre-application consultation.

§ Planning strategy assumes consultation via No.2 public exhibitions and meetings.

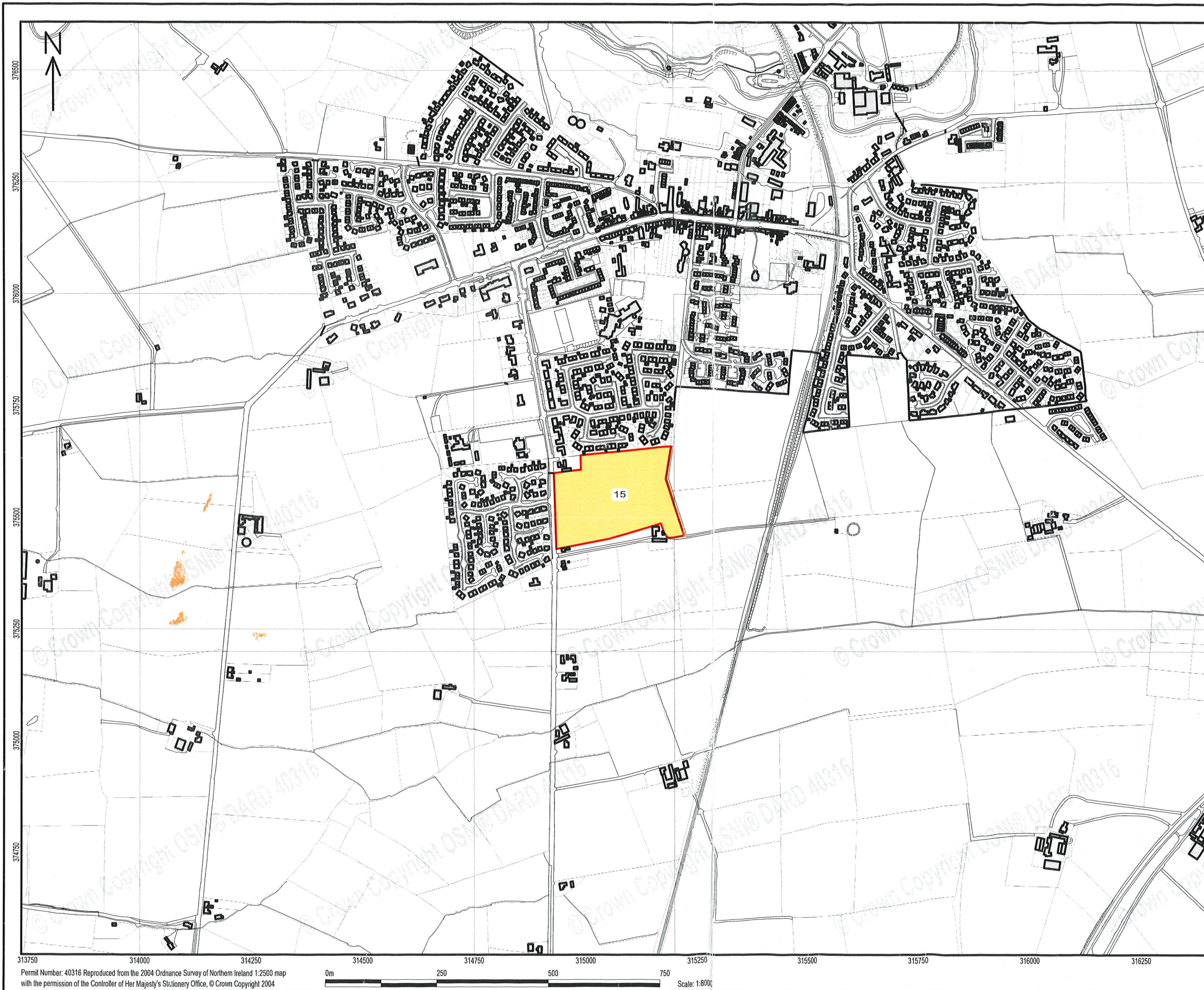
§ Circa 120 dwellings based on indicative design scheme.

§ Planning Fee based upon 4.86 ha site area.

\* Estimated. Final amounts to be preagreed with client subject to tendering and detailed scoping.

Initial Planning Assessment v.4 16/02/19





Applicant 101205 Owned

FSN: 1/113/036  
Field Nb.  
15

Area (Ha)  
4.86

Type  
LL



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Date: 08/03/2006





# Antrim Area Plan

## Crumlin

Development Limit



Development Land  
Primarily Residential



Town Centre



Link Road



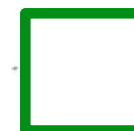
Existing Sewage Works



Recently developed land



Proposed development land (CHL)



Sports Fields



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Scale  
150m 100m 0m 100m 150m  
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ADAPTED FROM DEPARTMENT FOR  
NORTHERN IRELAND

ANTRIM AREA PLAN

PROPOSALS MAP NO. 6 (JUNE 1989)





Field Boundaries

Yellow box: Checked by DARD

Red box: Not checked by DARD

Red X: Field to be deleted

Blue X: Ineligible Feature



Scale: 1:5000

Photo Date(s): 15/05/2008 - 25/03/2012 Printed: 29/12/2012 Page 4 of 4

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