



Local Development Plan 2032

Draft Plan Strategy

Representation Form

Please complete this representation form online and email to LDP@lisburncastlereagh.gov.uk or alternatively print and post a hardcopy to:-

Local Development Plan Team
Lisburn & Castlereagh City Council
Lagan Valley Island
Lisburn
BT27 4RL

All representations must be received no later than 5pm on the 10th January 2020

SECTION A: YOUR DETAILS

Please tick one of the following:-

- Individual
 Planning Consultant / Agent
 Public Sector / Body
 Voluntary / Community Group
 Other

First Name

Last Name

Details of Organisation / Body

Address

Postcode

Email Address

Phone Number

Consent to Publish Response

Under planning legislation we are required to publish responses received in response to the Plan Strategy, however you may opt to have your response published anonymously should you wish.

Even if you opt for your representation to be published anonymously, we still have a legal duty to share your contact details with the Department for Infrastructure and the Independent Examiner appointed to oversee the examination in public into the soundness of the Plan Strategy. This will be done in accordance with the privacy statement detailed in Section C.

- Please publish *without* my identifying information
- Please publish with only my Organisation
- Please publish with my Name and Organisation

SECTION B: YOUR REPRESENTATION

Please set out your comments in full. This will help the independent examiner understand the issues you raise. *You will only be permitted to submit further additional information to the Independent Examiner if the Independent Examiner invites you to do so.*

What is your view on the Plan Strategy?

- I believe it to be **SOUND**

If you consider the Draft Plan Strategy to be **sound**, and wish to support the Plan Strategy, please set out your comments below:-

Not Applicable

(If submitting a hardcopy & additional space is required, please continue on a separate sheet)

OR

I believe it to be **UNSOUND**

PLAN COMPONENT - To which part of the Plan Strategy does your comment relate?

IF YOU WISH TO SUBMIT ANY FURTHER REPRESENTATIONS, PLEASE COMPLETE SECTION B FOR EACH INDIVIDUAL ISSUE

Part 1 – Plan Strategy

- Chapter 1 - Introduction
- Chapter 2 - Policy & Spatial Context
- Chapter 3 - Vision & Plan Objectives
- Chapter 4 - Strategic Policies and Spatial Strategy
- Chapter 4A - Enabling Sustainable Communities & Delivery of New Homes
- Chapter 4B - Driving Sustainable Economic Growth
- Chapter 4C - Growing our City, Town Centres, Retailing & Other Uses
- Chapter 4D - Promoting Sustainable Tourism, Open Space, Sport & Outdoor Recreation
- Chapter 4E - Protecting & Enhancing the Historic & Natural Environment
- Chapter 4F - Supporting Sustainable Transport & Other Infrastructure
- Chapter 5 - Monitoring & Review

Part 2 –Operational Policies

- Operational Policy (Please State Individual Policy using Policy Reference e.g. HOU 1)

SOUNDNESS TEST:

Please identify which test(s) of soundness your representation relates to, having regard to Development Plan Practice Note 6 (available on the Planning Portal website at <https://www.planningni.gov.uk/index/s/development-plan-practice-note-06-soundness-version-2-may-2017.pdf>)

- P1 Has the Plan Strategy 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 Plan Strategy been subject to sustainability appraisal including Strategic Environmental Assessment?**
- P4 Did the Council comply with the regulations on the form and content of its Draft Plan Strategy and procedure for preparing the Draft Plan Strategy?**
- 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?**
- CE1 Does the Plan Strategy set out a coherent strategy from which its policies & allocations logically flow & where cross boundary issues are relevant it is not in conflict with the Plan Strategies 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

Please give details of why you consider the Plan Strategy to be **unsound** having regard to the test(s) you have identified above. Please be as precise as possible.

See Attached Sheet.

(If submitting a hardcopy & additional space is required, please continue on a separate sheet)

MODIFICATIONS

If you consider the Plan Strategy to be **unsound**, please provide details of what changes you consider necessary to make the Plan Strategy sound.

See Attached Sheet

(If submitting a hardcopy & additional space is required, please continue on a separate sheet)

I wish to attach supporting information with my representation e.g. map

IF YOU WISH TO SUBMIT ANY FURTHER REPRESENTATIONS, PLEASE COMPLETE SECTION B FOR EACH INDIVIDUAL ISSUE

SECTION C: DEALING WITH YOUR REPRESENTATION

Please indicate how you would like your representation to be dealt with.

Written Representation

Oral Representation

Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

SECTION D: DATA PROTECTION

In accordance with the Data Protection Act 2018, Lisburn & Castlereagh City Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure.

It should also be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure (DfI) as they will be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the privacy section at www.lisburncastlereagh.gov.uk/information/privacy

By proceeding and signing this representation you confirm that you have read and understand the privacy notice above and give your consent for Lisburn & Castlereagh City Council to hold your personal data for the purposes outlined.

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 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 and the Independent Examiner will, upon receipt, be responsible for the processing of your data in line with prevailing legislation. If you wish to contact the council's Data Protection Officer, please write to:

Data Protection Officer
Lisburn & Castlereagh City Council,
Civic Headquarters,
Lagan Valley Island,
Lisburn,
BT27 4RL

or send an email to: data.protection@lisburncastlereagh.gov.uk or telephone: 028 9244 7300.

Signature

Date

Lisburn and Castlereagh City Council Local Development Plan

Response to Draft Plan Strategy

Ref: 16/11 (26)(dPS)
 Client: North Lisburn Development Consortium

DETAILS

Please give details of why you consider the Plan Strategy to be **unsound** having regard to the test(s) you have identified above. Please be as precise as possible.

Introduction:

1. Our client ^{North Lisburn Development Consortium} is a consortium of major house builders in the LCCC area who request additional lands in North Lisburn are included inside the Lisburn Settlement Limit and zoned for housing with ancillary social care.
2. In summary our client's case is that the Housing Requirement identified by the POP and now the draft Plan Strategy is too low to address the housing market pressure that LCCC is experiencing and that the calculation should be reviewed and increased. We also take issue with the Council's approach to housing allocations as set out in the draft Plan Strategy.
3. We have prepared a Working Paper on Plan Strategy Housing Matters at **Appendix A**. We also provide at **Appendix B** a map of our client's site.
4. We consider the draft Plan Strategy to be unsound because:

P1 The Council has not taken into account the representations made to the POP;

C3 The Council has not had proper regard to the advice of the Chief Planner in determining its Housing Requirement calculation;

CE1 The Council has not set out a Strategy from which all policies logically flow as the Strategy does not include a robust Housing Requirement calculation;

CE2 The Strategy, policies and allocations are subdued in respect of housing and have not considered the relevant alternatives and material considerations highlighted in **Appendix A** and are not founded

on a robust evidence base. The housing allocations have not been critically determined and only reflect remaining housing land that is being monitored in the various LCCC settlements;

CE3 There is no clear mechanisms to monitor the Plan Strategy as the Council have not prepared a robust and transparent housing trajectory;

CE4 The Plan Strategy is not reasonably flexible to deal with changing circumstances. The Plan Strategy does not reflect the potential that a number of towns in the LCCC area are under provided for in the Housing Requirements.

P1 Consideration of POP Representations

5. The Plan has failed to have regard to the representations made to the POP. The POP highlighted a need for 13,300 new homes in the Plan Area and for 6,500 additional jobs.
6. The Council have provided no explanation in the draft Plan Strategy or Technical Supplement 1 (T/S 1) as to why the POP figures, and subsequent representations have been side aside and not built upon in the draft Plan Strategy. Instead, the Council has commissioned external consultants to produce a Housing Requirement figure that applies a limited GB approach to housing growth scenarios.
7. The efforts the public have made to influence the Plan via the POP does not seem to have had any purpose in regard housing.

C3 Failure to have Regard to Advice of the Dfl

8. As set out at **Appendix A** the Chief Planner has provided guidance to the Council on how the uHGIs should be treated. The Council has not set out how it has had regard to the advice of the Chief Planner and as shown in **Appendix A**, it is not clear that the Council's Housing Requirement estimates have had proper regard to the current market conditions of LCCC, nor have they had regard to all factors that can influence the Housing Requirement. Moreover, the Housing Requirement figures do not appear to have regard to the policies and aspirations of the draft Plan Strategy.

CE1 & CE2 The Need for a robust Plan Strategy and Allocations are realistic and founded on a robust Evidence Base

9. The draft Plan Strategy sets out a Settlement Hierarchy in Figure 3 and Table 1. This is merely a reflection of the status quo of what towns and villages exist. There is no strategy or plan for changes in areas to boost their role and function. It is unclear what precisely the Plan Strategy is seeking to achieve other than to keep the towns in the LCCC area to be of the same status as exists. There is no ambition or direction in the Plan Strategy.

10. It is notable that Appendix D states that there is a good supply of housing land in Lisburn. This statement is unconnected to whether there is a need to expand Lisburn or not. The Spatial Strategy is based on a flawed approach to the Housing Requirement. The Council's flawed Housing Requirement and unclear approach to urban capacity means the Council and the public are unable to be confident that there is a realistic Housing Requirement figure provided and whether the lands identified by the Council are available and suitable, and of sufficient volume to meet the Housing Requirement.

11. If the Housing Requirement figure is too low and housing land supply is inflated the draft Plan Strategy of leaving all towns and settlements as they are is flawed. What confidence has the Council in its Housing Requirement figure? Appendix A sets out why we are clearly concerned that both the Council's Housing Requirement figure and its housing land supply are flawed. The Council's evidence is that currently the housing market is under stress – a feature highlighted by the Council's own consultants. Added to this is the concern that the Council's updated Housing Requirement figures are below the DfI uHGIs, despite the Council's consultants warning that it was likely that official Housing Requirement figures would not be sufficient to meet the challenges of the LCCC area and the housing issues it faces.

12. The draft Plan Strategy page 27 somewhat unusually only refers to the HGI figures previously published by DfI. It does not note that the Council's POP found a need for 13,300 dwellings. It is against this base that the revised HGI figure of 10,500 should be considered.

13. Draft Plan Strategy page 58-64 elaborates on the Housing Requirement. It reiterates the baseline Housing Requirement of 10,500. The Council was aware of the uHGIs when it published its draft Plan Strategy as it post-dates the Chief Planner's letter of 25th September 2019. The fact that the draft Plan Strategy applies the 2012 based rHGIs is surprising and inconsistent with the more up to date evidence available. It is a requirement for the draft Plan Strategy to be robust having regard to alternatives. Plainly the DfI's alternative uHGI figures undermine the soundness of the draft Plan Strategy given they provide for higher uHGIs and are policy neutral figures.

14. The Council's attempt to include a buffer into its figures is simply an allowance of a further 10% of housing to support the Council's aspiration for delivery of the Blaris Strategic Mixed Use Site. If the Council's Housing Requirement is incorrect, the buffer provided by Blaris will have no impact as it is not even considered likely to come on stream for 8 years, which is more than likely an ambitious timeframe. If other areas and towns come under housing pressure because land is not available, there is no buffer allowance provided. If the Council's Housing Requirement figures are too low, which

appears the case given the new uHGs, then Lisburn has the potential to experience increased house prices, higher private sector rents and increased housing stress.

15. We have provided at **Appendix A** a re-working of the Housing Requirement figures. Below we provide a housing allocation based on our Housing Requirement figures that takes account of the backlog, overzoning/buffer, social housing and providing a 5 year supply beyond the Plan period.

Housing Allocation 2017-2037

Settlement	%	No of Units
Lisburn City	35%	7332
Lisburn Greater Urban Area	5%	1047
Castlereagh Greater Urban Area	12%	2514
Carryduff	10%	2095
Hillsborough & Culcavy	7%	1466
Moria	7%	1466
Urban Settlement Total	76%	15,920
Villages	15%	3142
Small Settlements	5%	1047
Countryside	4%	733
Total Units	100%	20,843
Strategic Allocation - Blaris	10%	1500
Total No of Units	110%	22,343

16. This allocation ensures that there is a balance between providing high volumes of sustainable housing in the main urban settlements and also providing adequate numbers of housing to help sustain villages small settlements.
17. The Council’s analysis of Meeting Future Housing Needs (draft Plan Strategy page 62) sets out the concerns and issues of the LCCC area, and yet, when it considers the future Housing Requirement, no evidence is provided on how the Council will address the housing market conditions, or address the needs of the aging population or how it will encourage net in-migration. It solely relies on the jobs-led growth scenarios provided in T/S 1 which result in a range of scenarios that are substantially below the official government figures, when by their own admission they need to be in excess of the official forecasts.

18. The supply of housing land as set out in draft Plan Strategy part 3 page 59 shows that the Council relies upon its Housing Monitor of 31st March 2017 to estimate the remaining housing land. It is the remaining availability of housing land in settlements which appears to dictate the housing allocations set out in Table 3 (page 64). A deduction of 10% is made to reflect that some lands may not come forward. However the figures produced do not reflect the actual figures in the Housing Monitor which are reproduced below.

5. Summary Statistics for Settlements

Settlement	Units/Dwellings Complete 2016-2017	Potential (Units/Dwellings) Remaining 2016-2017	Area Developed (Ha) 2016-2017	Area Remaining (Ha) 2016-2017
Lisburn	257	4606	10.8	165
Lisburn Greater Urban Area	50	218	1.7	6.6
Castlereagh Greater Urban Area Including Dundonald	168	1872	9.2	105.4
Carryduff	16	1580	0.3	61.8
Hillsborough & Culcavy	21	486	1	22.5
Moira	34	609	1.3	27.6
Total for City, Greater Urban Areas and Towns	546	9371	24.3	388.9
Total for villages	60	1044	3.1	42.9
Total for small settlements	25	324	1.3	18.2
Overall Total	631	10,739	28.7	450

Table 1: Units Complete, Potential Units Remaining, Area Developed and Area Remaining 2016-2017 in Settlements

Extract from LCCC Housing Monitor 2016-2017

19. It is not clear how the Council produced Table 3 utilising the data in the Housing Monitor. This is a flaw in the evidence base of the draft Plan Strategy.

20. Setting aside any numerical errors or assumptions, the Council’s approach to its Housing Allocations has been to simply rely upon the existing housing land available in the various settlements. With the exception of allowing a 10% buffer of housing to support delivery of Blaris, no effort has been made to consider the Housing Allocation based on anything other than the existing Housing Monitor. There is no evidence of a strategy or vision for any towns in the hierarchy which is driven by housing growth. If the Plan never came forward the future function of the various towns and settlements would continue. This poses the question of the relevance and purpose of the housing allocation in the draft Plan Strategy?

21. It is worrying that even though the Council know the housing market of LCCC has a backlog of housing need, and underperformed in providing housing and has challenges across many levels, that the

Council have not critically reviewed the non delivery of housing land with a view to reallocating housing to towns and areas where delivery is in demand or where it can be provided because there are willing landowners and developers to release land and build homes.

22. The Council relies upon its Urban Capacity Study (UCS) at draft Plan Strategy page 60, when it states that the UCS found that *"for the Plan period there was sufficient supply of housing land to accommodate the growth ambitions of the Council"*. This statement is only correct if:
- a. The Housing Requirement figure was accurate – which it is not;
 - b. The housing land supply was delivering adequate housing units, which it is not given the backlog and under delivery of housing already evident.
23. Overall the draft Plan Strategy in respect of housing numbers is not robust particularly having regard to alternatives. It must follow that the Housing Allocations are unsound as they allocated underestimated Housing Requirement figures.

CE3 & CE4 Monitoring and Flexibility

24. With our concerns about the under estimate of the Housing Requirement figure and the housing market problems that are apparent in the undersupply of housing, it is vital that the Council prepare a housing trajectory to demonstrate that it can meet a 5 year rolling housing land supply and if it is failing to do so, there should be a mechanism for the Council to intervene and release additional lands to relieve and pressure built up in the housing market.
25. Aligned to the concept of monitoring, the Council should also include a proper buffer allowance of additional housing lands to counter balance any non release of lands. The Council's current approach of providing 10% buffer focused solely on Blaris, it would be prudent to add a further 10% allowance to relieve any market pressure across all settlements in the LCCC area.

Lands Available for Housing

26. While the debate about land suitability will be held in detail at the Local Policies Plan stage, we would seek the inclusion of lands north of Derriaghy Road (Lisburn North Feeder Road) to be included inside the settlement limit and zoned for housing. The lands have quick and easy local access to all parts of Lisburn City and are strategically located to provided access to Belfast via the M1 and the international airport via Dundrod. The site would be preferential in the context of traffic and roads capacity when compared to other areas of housing growth in Lisburn.

27. The lands are ideal for development and no significant environmental constraints. In particular, the lands would be free from potential flooding, which is clearly an important benefit in the context of current climate conditions and constraints. There is a rath on the north part of the site, and this could form an attractive environmental/open space feature in any future concept layout. A very small part of the site is located inside the Rural Landscape Wedge designated in the draft Belfast Metropolitan Area Plan between Lisburn and Milltown, but this land can be left as a future landscape buffer and integrated into any future housing layout concept. Access to the lands is already available from the upgraded Derriaghy Road.

Landscape Wedge and Strategic Policy 19

28. We note that the Council propose a Landscape Wedge in Lisburn (MAP 4), and under Strategic Policy 19 note that these landscape wedges have been carried over from draft BMAP. While we do not consider this to be a deterrent to zoning, our client would object to the Lisburn Landscape Wedge insofar as it includes their lands at Derriaghy Road within it. We note that draft Plan Strategy page 128 states that further work in reviewing existing Landscape Wedges will be assessed as part of the Local Policies Plan. We therefore reserve our right to comment further on this matter in due course.

MODIFICATIONS

If you consider the Plan Strategy to be **unsound**, please provide details of what changes you consider necessary to make the Plan Strategy sound.

29. To make the Plan sound it needs to :-

- a. Provide a robust objective assessment of Housing Requirement
- b. Provide a Housing Allocation that supports main urban areas and allows them to grow and thrive and to meet the needs of the changing population profile of LCCC
- c. Our client’s lands should be included inside the Lisburn settlement, zoned for housing use and excluded from the landscape wedge.

Appendix

- A Working paper on Plan Strategy Housing matters
- B Site Map

Appendix A Working Paper on Plan Strategy Housing Matters

Updated Housing Growth Indicators (uHGI)¹

1. It is unfortunate that the Department for Infrastructure (DfI) has only on 25 September 2019 published and presented its updated Housing Growth Indicators. The DfI's figures highlight that Lisburn and Castlereagh City Council (LCCC) has a Housing Requirement between 2016-2030 of 10,700. This would equate to a requirement for LCCC of 11,460 over a 15 year period between 2017-2032 which is the Plan Period. This is considerably above the Council's Housing Requirement calculations identified in the draft Plan Strategy (page 58) of 10,500 - a figure that is rounded up!
2. The release of the DfI figures results in the Council's draft Plan Strategy being immediately out of date. While many Councils treat HGIs as merely a guide, and changes to the DfI figures could be seen as unhelpful, but not serious, LCCC regrettably appears to have calculated its figures to reflect the DfI estimates. Despite LCCC Position Paper 2 (November 2019) acknowledging that DfI had produced updated figures, LCCC take the view that the uHGIs "*very closely align*" with the figures produced by LCCC's consultants who undertook the Housing Growth Study before the uHGIs were released.
3. We enclose at Annex A a copy of the Chief Planner's letter to the Head of Planning at LCCC dated 25 September 2019, wherein the Chief Planner makes a number of important points:
 - a. The uHGIs do not forecast exactly what will happen in the future;
 - b. The uHGIs are '*policy neutral*' estimates based on recent trends and best available data on households and housing stock;
 - c. The uHGIs assume past trends will continue into the future;
 - d. The uHGIs do not attempt to model existing policy or societal factors nor predict the impact that future policies, changing economic circumstances or other future events may have on housing requirements in LDPs;
 - e. uHGIs are not a cap or target, but are a starting point to guide assessment of overall Housing Requirements in LDPs;
 - f. Councils should assess the uHGIs applicability to local circumstances in the context of the SPPS requirements and other Council Strategies/Objectives, the likely impact of

¹ rHGIs refers to revised HGIs produced by DoE in 2016 and uHGI refers to updated HGIs produced in 2019.

corresponding strategies in neighbouring Council's, the capacity of existing or planned infrastructure to facilitate development or other evidence of recent build rates;

- g. LDPs must aim to make provision for the Housing Requirement considered appropriate as a result of analysis of all relevant sources of evidence...This reflects the reality that appropriate LDP Housing Requirements are influenced by a complex range of factors within the Plan Area and beyond.
4. LCCC's figures for Housing Requirement are a reduction on the POP figures of 13,300 (738 dwellings per annum ((dpa)). Dfl's figures now suggest there is an increased annual requirement of 764 dpa in LCCC. The Council are suggesting a requirement for 692 dpa (rounded up to 700dpa).
 5. This is an immediate concern that LCC's consultants have seriously underestimated the Housing Requirement for LCCC.
 6. LCCC include "a buffer of 10% oversupply" to bring their Housing Requirement figure up to 11,550. However, providing a pro-rata allowance of the uHGI's shows that there is a uHGI requirement of 11,460 and that the LCCC "buffer" is only 90 additional units over 15 years (6 units per year). It is a buffer of less than 1% and clearly wholly inadequate.
 7. Despite the suggestion that the LCCC and Dfl figures are "closely aligned" even as a starting point the LCC figures are an underestimate.
 8. This of course still does not include any proper allowance for the factors highlighted by the Chief Planner in his letter outlined above.

Policy Approach to Determining the Housing Requirement

9. The approach to determining the Housing Requirement is guided by the RDS which notes (page 102) that "Council's will be able to use the Housing Growth Indicators as baselines or starting points which can subsequently be adjusted in light of the Housing Market Analysis for their area".
10. The RDS notes that the "Northern Ireland Housing Executive is moving to a system of Housing Market Analysis that will aim not only to identify social housing need but also to provide a solid evidence base on which available land can be zoned for housing by planners. There is a growing

consensus that there needs to be a broader approach to assessing housing need: one that aims to understand the workings of the wider housing market and that will look holistically at infrastructure, planning, the socio-economic context, regeneration needs, health, education etc” [Emphasis Added].

11. The RDS notes that a Housing Market Analysis will help develop a comprehensive evidence base to inform decisions about the policies required in housing strategies and the development of area plans.
12. The SPPS page 71-73 notes a range of factors to be considered in the process for allocating housing land. It includes that the HGIs that are provided as an “estimate” and “guide” for new dwelling requirements. It notes a requirement to make a windfall allowance but notes that the scale of windfall allowances will vary from area to area, and an allowance can be made on past trends. It also notes that the Housing Needs Assessment/Housing Market Analysis provides an evidence base that must be taken into consideration in the allocation through the development plan, of land required to facilitate the right mix of housing tenures including open market and special housing needs such as affordable housing, social housing, supported housing and traveller accommodation. There is no evidence to suggest that the Council have had proper regard to the Housing Market Analysis in the manner suggested by the SPPS.

The Council’s Approach to Housing Requirement

13. The Council need to take account of a variety of factors in deciding the appropriate Housing Requirement. The Council has commissioned a Housing Growth Study included as Technical Supplement 1 Housing Growth Study (T/S 1).
14. T/S 1 makes the following notable points:-
 - a. LCCC is part of the Core Belfast Local Housing Market Area (HMA). This is the largest and most complicated HMA across Northern Ireland. T/S 1 para 3.14 highlights the important relationship between LCCC and the wider Core Belfast HMA and notes that the implication for LCCC is whether any future housing requirement identified is to meet the requirement of LCCC going forward and if there is any unmet demand within the wider market that is required to be accommodated in LCCC or if any unmet demand in LCCC is to be met outside LCCC;

- b. In migration terms T/S 1 paras 3.19-3.22 notes that people moving from Great Britain were concentrated in LCCC, Belfast, Ards and North Down; inter district moves were concentrated between Belfast and Coleraine and to a lesser extent Newtownabbey and Castlereagh; in 30+ age groups in Belfast people moving stayed within an hour's drive of the City. These trends highlight the important relationship between Belfast and LCCC given the increased desire of people to move by a distance which still enables commuting to a place of existing employment. Providing jobs aligned with future housing will be important for LCCC to enable future residents to live and work in the local area;
- c. In terms of house prices T/S 1 para 4.3 indicates that data from Q1 2019 shows that LCCC had the highest average house prices outstripping NI average by 18.9%. Data between 2005-2019 shows LCCC and Ards and North Down have consistently had the highest house prices over 14 years;
- d. In terms of sales T/S 1 para 4.5 notes LCCC has experienced an overall trend of increasing sales since 2011, consistent with NI and suggests a return to the number of sales experienced prior to 2007;
- e. In terms of unaffordability T/S 1 para 4.6 notes that unaffordability in LCCC has dropped from 69% in 2012 to 58% in 2016. This implies that in 2016 LCCC was joint fourth least affordable local government district in NI. It had been second least affordable in 2012;
- f. In terms of the deposit gap T/S 1 paras 4.9-4.10 notes that affordability is a particular issue for LCCC and NIHE notes *"a significant increase in the proportion of private rented sector properties from 2.7% in 2001 to 9.2% in 2011"*;
- g. Rental for family homes is higher in LCCC than the NI average (T/S 1 para 4.12);
- h. Overall LCCC is a strong housing market with high and rapidly increasing house prices, affordability indicators have been rising prior to 2016, and there are concerns for people bridging the deposit gap which is combined with increased numbers of private sector rental properties and rent levels that are slightly above the NI average;
- i. In terms of completions T/S 1 para 4.15-4.16 notes there has been a *"shortfall in housing delivery against estimated future need which has served to create a situation of undersupply which has exacerbated market pressure, leading to high house prices and an increased reliance on the private rented sector. The evidence of market pressure in LCCC implies there is a need for more housing and evidence basing the future*

requirement on the official projections may not be sufficient to deal with the housing challenge that exists in LCCC”; (emphasis added)

- j. In terms of population growth T/S 1 para 5.4 notes that since 2001 the population of LCCC has increased by 14.5% compared to the NI average of 10.8%;
 - k. In terms of population growth T/S 1 para 5.7 notes that the projected 19% increase in population is higher than all other Councils except Armagh, Banbridge and Craigavon Council. It is more than double the NI average growth and almost five times the predicted growth for Belfast;
 - l. In terms of age T/S 1 para 5.8 highlights future population growth will be driven by the 65-84 age group (+66%) and over 85s (+153%). The implication is that by 2041, more than 25% of the LCCC population will be over 65 compared to 17% in 2017;
 - m. In younger age groups, there is limited growth such that there is expected to be a reduction in the population of working age. T/S 1 para 5.9 notes that *“This could have significant implications for the economic well-being of LCCC and highlights the need to ensure that there is a sufficient labour force to support future jobs growth and to help rebalance the ageing population”* This changing demographic profile raises concerns over any future Housing Requirement that looks at past jobs-led scenarios. The demography of LCCC is changing and policies need to be developed to meet the challenges that these changes raise. Forecasts of future Housing Requirements should reflect these new policies;
 - n. In terms of migration there has been a rise in net in-migration in 2016 (+1,089); and
 - o. In terms of household projections T/S 1 notes that applying NISRA data for 2016 housing growth per annum for the plan period is expected to be 581 dpa. T/S 1 para 5.18 notes that the 2016-based projections anticipate a greater level of housing growth than by the 2012-based projections.
15. Despite the above comments which all point towards a higher Housing Requirement, T/S 1 recalculates the Housing Requirement to be 10,380 units. It acknowledges the lower annualised dpa figures however suggests the lower results are because of a different time periods for assessment. Even if this is correct, the Council should step back and consider critically, the characteristics of the LCCC housing market as described above. High rents, a wide deposit gap, significant high private rental sector involvement all point towards a housing market that appears to be under stress. That stress is occurring at a time when (as discussed below) the Council considers there to be adequate existing land in settlements to meet demands. In our view, the Council should acknowledge that even with the level of housing

lands identified the features of the housing market stress means that there is a failing in the housing market.

16. The Housing Growth Study goes on to model a number of scenarios based on jobs growth assumptions. The Study uses a computer package called PopGroup to model outcomes of scenarios. However, there is no transparency in how this model has been developed, and how it has been used. Given that all scenarios presented show a lower dpa than 718, when Dfl have itself found a dpa of 764 and previously had a dpa of 738, it seems again surprising that the Council has not challenged or queried its consultants on why the growth projections are lower than what is already in the public domain. This is particularly important given the consultants themselves state that a future Housing Requirement based on official projections may not be sufficient to deal with the housing challenge that exists in LCCC.

17. Moreover, the Housing Growth Study itself highlights the issue of the changing demographic profile of the Council area and the need to boost jobs to counter balance the aging population in the LCCC area. Indeed, in order to take care of the aging population, there is a need for a strong LCCC economy to generate rates, taxes and salaries to pay of the long term care of an aging population. There will also be a need for young people to work in an expanding care industry. Furthermore, the POP identified the opportunity to expand the employment base through the provision of additional jobs and estimated 6,500 new jobs as shown below.

Economy

In terms of employment, economic activity is high (at 70% compared to the NI average of 66%) however it is recognised that there is potential to further grow and expand the employment base through the provision of additional jobs, of which 6,500 are estimated to be required over the Plan period from 2015-2030.

Given the key strategic location of the Council area regionally, there are significant opportunities to attract a wide range of major employment types, in particular on the two Major Employment Locations at West

Extract of POP page 14.

18. We challenge the Council's modelling on the basis that the Dfl has identified a higher housing requirement than the Council, and that Dfl figures are policy neutral, and based on household formation rates. They do not take into account the Council's policy objectives of developing strategic employment sites at Purdysburn or Blaris nor do they consider the growth of Lisburn City Centre or Sprucefield. Nor do they consider the need for increased employment to cater

for the aging population, the strategic opportunities that the Lisburn Castlereagh area offers given its excellent transport network connections, proximity to Belfast and the Republic of Ireland. Nor does the DfI factors consider the need to address the high house prices in LCCC, the high private rent levels and the deposit gap for people trying to get out of rental accommodation and buy their own home.

19. The Council must fundamentally review its approach to the Housing Requirement looking at the economic and societal demands of LCCC and the wider considerations of social housing need, an increasing elderly population, demands from people seeking to relocate from Belfast and Great Britain. The Council's assessments to date are based on predictions based on past trends. They are policy neutral estimates assuming what happened in the past may happen in the future. They pay no regard to the policy being laid out in the Plan. In order to identify an objective assessment of Housing Requirement the Council's should have sought to reflect the aspirations of the draft Plan Strategy itself.
20. We do not propose to significantly recast our estimates of Housing Requirements however below we work through the implications for taking account of various factors that should be considered in reaching an objectively assessed Housing Requirement. We do this in advance of the Council producing a further revised Housing Requirement that is robust and fully evidence based in line with the requirements of the Chief Planner. We reserve the right to comment further on this in due course.

Backlog

21. The Council has employed consultants that will regularly have undertaken work in Great Britain and dealt with the need for Council's to address the issue of backlog of housing supply. T/S 1 indicates features of housing market pressure that suggests there has been an undersupply of housing. It is surprising that the Council's consultants do not address this issue, even if there is no policy requirement in NI for it, it is an aspect of Housing Requirement methodology that can be assessed to provide an objective assessment of Housing Requirement for LCCC.
22. The DfI's latest uHGIs indicate that LCCCs annual Housing Requirement is 764 dwellings. This would suggest that between 2012 – 2017 there should have been 4,584 dwellings built in the Plan area. Using the figures for completion from T/S 1 Figure 4.3 indicates that there has been 3,050 dwellings completed in the area (a dpa of 508). There is a backlog of 1,534 dwellings in the area. In GB this backlog would be required to be included in the Housing Requirement

figures and included in the first five years of the Plan to ensure that housing land supply is boosted. No allowance is made in any of the scenarios modelled by the Council to address this backlog. Even adding it to DfI figures of 11,460 over 15 years would identify a Housing Requirement of 12,994 dwellings.

Overzoning

23. The Council seeks to include a buffer of 10% in its Housing Requirement, increasing its Housing Requirement figure from 10,500 to 11,550. However, given the evidence of housing market pressure and the fact that LCCC appears to be relying on Blaris to meet the 10% overzoning allowance as set out in draft Plan Strategy Table 3, (which will not come forward for another 8 years), it would be prudent to include an overzoning allowance of 20% (10% to Blaris and 10% to all other settlements). Applying this to the DfI Housing Requirement and including the need to address the backlog would mean the Housing Requirement is $12,994 + 2,599 (20\%) = 15,593$.
24. Generally this approach would be consistent with the tests of soundness, in that the Council are required to incorporate flexibility into the Draft Plan Strategy.

Social Housing Needs

25. The Council's draft Plan Strategy identifies Social Housing Need. The LDP process is the primary vehicle to facilitate any identified Social Housing Need and the LDP needs to take account of NIHE Housing Needs Assessment. The Social Housing Need for the period up to 2032 is 2,490. The Housing Growth Study (T/S 1 para 8.3) states that this figure is built into the HGI figure for Lisburn and Castlereagh. However, we have consulted with DfI who have advised us that:

"The HGIs do not specifically consider social housing need requirements. They are based on demographic and housing stock data and produce an estimate of overall need based only on those aspects. The HGIs do not take into account any social, economic or policy factors.

There will likely be differing needs for affordable housing across each local council district and it is up to Councils as to how they use/apply the HGI figures and apportion them to their circumstances. Councils will present differing forms of evidence as to how they might model for splitting that overall need as presented in the HGIs (or indeed presenting a different need) between social/affordable housing and market housing; what data is used to inform that and how that happens is for each Council's to develop and model in their Local Development Plan. They may wish to use any evidence available from NIHE or other sources around social housing

need in their Plan and supplement the information presented in the HGIs. Whether that is as a proportion of the HGI estimate or in addition to it is also for Council's to evidence/model.

26. The Council are therefore incorrect to suggest that social housing needs are built into the uHGIs. They are not. It is a matter for the Council to decide whether an additional allowance should be made for social housing in addition to the uHGI figures.
27. If the Council included 50% of social housing need as additional housing requirement, it would add 1,245 units to the Housing Requirement bringing the Housing Requirement to 16,838 units.

A Continuing 5 Year Supply

28. The SPPS paragraph 6.140 states, "A 'plan, monitor and manage' approach is necessary to ensure that, as a minimum, a 5 years supply of land for housing is maintained". The Council should ensure that a 5 year supply of housing is maintained and provided beyond 2032. There are three very good reasons for this:
- a. If the Housing Requirement estimate is correct and all lands are taken up by 2032, there is no prospect that the Council will have a new Plan in place in 2032, based on past and current evidence;
 - b. If the Council's supply of housing is underestimated by way of the number of total houses allowed for there will be shortage of supply towards the end of the Plan period and supply will run out;
 - c. If the Council's allocation is located in too few sites which are of a strategic nature or the ability of house builders to deliver the required allocation is prevented because of long lead-in times or provision of infrastructure or the limited capacity of house builders to build sufficient homes quickly enough the provision of new homes will not meet demand.
29. As such the Council would be prudent in maintaining a 5 year Housing Requirement for the period 2032-2037. It would be a safety valve should either of the three scenarios occur. If a further 5 year supply was required, it could add a further 764-1,122 dpa to the Housing Requirement figure indicating a Housing Requirement of between 20,658 and 22,448.

“Policy-On” Considerations

30. The above figures do not provide an allowance for policy aspirations in the draft Plan Strategy itself. The housing market, social housing need, dealing with the backlog, etc have no bearing on what the Council is seeking to achieve in its draft Plan Strategy. Among the Economic Growth objectives in the draft Plan Strategy are *“facilitating the creation of new jobs and encourage existing and new businesses to invest with confidence”* and to *“accommodate population growth to ensure a continuous supply of labour and allow the resident population the opportunity to avail of high-quality employment opportunities in sustainable locations close to where they live”*. Such policy objectives will increase employment in the area and will increase in-migration. This may occur beyond previous trends. No forecasts have been made for increasing employment and in-migration beyond considering that what has happened in short and long terms in the past may happen in the future. That is not a ‘policy-on’ approach. The Council should be ambitious and clearly state what level of new jobs it wants to create, state that these will attract new in-migration levels, and that additional high quality, reasonably priced housing will be provided to facilitate this growth in the economy.
31. Furthermore, as shown above T/S 1 notes there could be a requirement for LCCC to meet demands for the Core Belfast HMA. No assessment has been made for this potential scenario.

Housing Land Supply and Build Rates

32. The Council needs to seek to understand the delivery of sites within settlements. If land has been zoned for many years and has never come forward, even during the economic boom of 2007, the Council must critically consider whether there is any likelihood of it coming forward in the Plan period.
33. Equally, if lands are zoned in large parcels, it would be concerning that single house builders would simply not have the capacity to deliver adequate numbers of houses to the market. If a builder can only build 25 dwellings per annum, it is irrational that all housing land should be allocated in a limited number of land parcels in a limited number of towns. The reality of the Northern Ireland housing market is that in order to deliver housing requires a spread of housing land within and across a separate number of towns.

Housing Trajectory and Monitoring

34. Added to the above requirements for a robust Housing Requirement, the Council must also provide a realistic housing trajectory that demonstrates that there is an availability of housing

land in all settlements to meet housing demands for the duration of the Plan Period. It is inappropriate to undertake an assessment of housing land supply which the Council has done in this case and not apply a proper consideration to the deliverability of the lands.

35. The Council's Urban Capacity Study (UCS) T/S 2 provides an 'indicative' housing trajectory, and candidly admits that it *'does not set out a detailed annual trajectory and does not take account of policy considerations'*. The indicative trajectory is based on 738 dpa (which is the old rHGI figure and relates to the POP Housing Requirement of 13,300 units). Table 15 of T/S 2 indicates that there is a supply of 14,074 units in existing settlements, of which 12,481 are found on suitable housing sites and 1,593 are provided by windfall housing.
36. The housing trajectory provides no details about which sites are meeting demands in which location and provides no transparency of the lead in times other than to set out in the methodology the assumptions being applied.
37. The concern of this 'indicative' approach is that in many cases there are sites being used that are not likely to come forward to meet housing need and yet they are included in the UCS trajectory. The basis for this concern is that despite the level of housing land being identified by the Council's consultants as being deliverable and developable, the evidence presented in the Housing Growth Study is one of a shortfall in housing supply leading to high house prices, high rent levels and a housing market under pressure. That pressure is plainly not going to be relieved if the Council persist to argue that they have lands within existing settlements, zoned or unzoned that can come forward. If lands that are already available and have been available either under the Lisburn Area Plan 2001 or draft BMAP which was first published in 2014, (i.e. for between 15-20 years) and still there is market pressure, the land supply cannot be considering to meeting the needs of the Plan area.
38. The consequence of this is that the Council has presented an unrealistically low Housing Requirement figure and an untested potential available housing land supply figure to contend there is limited requirement for additional housing land release. The subsequent gap between requirement and supply is unrealistic. This is a disproportionate approach to the important and fundamental component of a draft Plan Strategy. It has the impact of giving the users of the planning process the view that there is no point in engaging in the process as there is no need for any additional lands to be provided. However, much of the draft Plan Strategy evidence base needs to be scrutinised further to ensure it is robust.

39. We also note that in the UCS the assumption is that '50% of West Lisburn/Blaris for housing is included in the indicative trajectory'. The consultants assume an 8 year lead in time of this site due to it being unavailable until the LDP is complete and the requirement for major infrastructure works and planning permission to be obtained. The indicative trajectory includes Blaris around 2025. However, it is now 2020 and there is very little likelihood of the draft Plan Strategy being adopted and the Local Policies Plan being adopted before 2025. To subsequently obtain planning permission of a major strategic project which will have environmental impact considerations, possibly a public inquiry, complex Section 76 agreements, and delivery of major infrastructure including the M1-Knockmore Link Road and links to planned public transport at the West Lisburn railway halt, it is ambitious to consider that these lands will make any contribution to housing supply before 2028. A transparent detailed housing trajectory is needed if the Council's argument on housing land supply is to be found robust and sound.

Why Does Accurate Housing Requirement Figures Matter?

- 40. Establishing a robust Housing Requirement is a fundamental part of the Plan Strategy, and it is important to set out the reasons why and what happens if there is an under provision.
- 41. Landowners and house builders need to be encouraged and facilitated to provide for the LCCC Housing Requirements.
- 42. The implications of getting the Housing Requirement wrong can be that house building and the construction industry is constrained because there is insufficient supply of land, housing land supply in settlements is inadequate which undermines the viability of settlements, towns and villages become depopulated and are unable to support educational, health, religious and other civic services, economic output is reduced because the population is not attracted to come into the area as there are insufficient homes in a broad selection of locations, and failure to draw people into the area will undermine the economy's ability to grow. With an aging population the long term ability of an area to sustain itself will be undermined if new young residents were not encouraged into the area. Also there is a need for older people to have adequate choice of living accommodation that reflects their changing needs for their age. Other impacts can be:
 - a. Undermine the LDP Strategy;
 - b. Undermine the Council's Economic Strategy;

- c. Increase the cost of housing in the Borough;
- d. Increase housing stress and social housing need in the Borough;
- e. Widen the affordability and deposit gap in the Borough;
- f. Increase rents in the private sector;
- g. Force outward migration; and
- h. Increase use of unsustainable transport modes with people travelling longer journeys to work given lack of locally affordable homes.

Conclusion

43. The Council needs to:

- a. Review and take account of the Chief Planner's letter as a guide;
- b. Review the Housing Requirement methodology which is inadequate and needs to take account of a variety of factors to fully and objectively:-
 - i. respond to the higher uHGI's of DfI;
 - ii. address the backlog;
 - iii. include an over zoning allowance;
 - iv. provide a 5 year housing supply beyond the notional 2032 Plan end date;
 - v. ensure social housing needs are incorporated into the calculation;
 - vi. include a robust housing land delivery trajectory;
 - vii. assess realistic build rates and lead in times; and
 - viii. reflect the impact of the Council's Plan Strategy Objectives

Annex A

Chief Planner's Letter of 25 September 2019

Annex A

Regional Planning Directorate



Department for

Infrastructure

An Roinn

Bonneagair

www.infrastructure-ni.gov.uk

To
Heads of Planning (Councils)

Clarence Court
10-18 Adelaide Street
BELFAST
BT2 8GB
Tel: 0300 200 7830

Ema.

Your Reference:
Our Reference:

25 September 2019

Dear Heads of Planning

RE: HOUSING GROWTH INDICATORS 2016-2030

You will be aware that the Department recently undertook an exercise to refresh the Housing Growth Indicators (HGIs) set out in the Regional Development Strategy.

The work is now complete and a 2016-based Housing Growth Indicators (HGIs) paper is attached for your information. The paper sets out revised HGIs, taking account of updated data for three of the components which previously made up the HGIs, namely updated NISRA Household Projections, new House Condition Survey data published by NIHE and more recent data from the NISRA Central Survey Unit combined survey sample. The updated HGIs cover the period to 2030, ensuring they better correspond with the timescale for the majority of Local Development Plans (LDPs) currently under preparation.

It is important to note that HGIs do not forecast exactly what will happen in the future. They are policy neutral estimates based on recent trends and best available data on households and housing stock. They assume that recent trends will continue into the future. They do not attempt to model existing policy or societal factors nor predict the impact that future policies, changing economic circumstances or other future events may have on housing requirements in LDPs. For these reasons those preparing LDPs should not regard the HGIs as a cap on housing or a target to be met.

Notwithstanding the above, as the HGIs are based on best available data, they are therefore an important starting point to guide the assessment of the overall housing requirement identified in the LDP. The SPPS identifies a range of further considerations that, in addition to the HGI, should also inform this housing allocation. These include the

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Website: www.planningni.gov.uk

RDS Housing Evaluation Framework; allowance for existing commitments; urban capacity studies; allowance for windfall housing; application of a sequential approach to site identification; Housing Needs Assessment/Housing Market Analysis and transport assessments.

Rather than accepting the HGI estimate as a target to be planned for, Councils should first consider it's applicability to local circumstances in the context of the above-mentioned assessments and other relevant local evidence. This may include, for example, other Council strategies/objectives (for instance in relation to urban regeneration or economic growth); the likely impact of corresponding strategies in neighbouring councils; the capacity of existing or planned infrastructure to facilitate development; or other evidence in respect of recent build rates. This is not an exhaustive overview of the types of local evidence that may be relevant.

In summary, LDPs must aim to make provision for the housing requirement considered appropriate as a result of analysis of all relevant sources of evidence, including the HGI estimates provided by this Department. This reflects the reality that appropriate LDP housing requirements are influenced by a complex range of factors within the plan area and beyond.

Councils should now take account of this revised indicator alongside all other relevant evidence gathered to date, to justify the housing requirement in the draft Plan Strategy; depending on the methodology or approach used to arrive at this requirement, this update may have a variable impact. It is important that Council can demonstrate that they have taken this revised indicator into account. I am of the opinion that it is in the interests of both Local Councils and the Department that Plans are prepared using the most up to date estimates available. This reflects the requirement for LDPs to be prepared using a sound evidence base of which the HGIs are an important element.

Yours sincerely

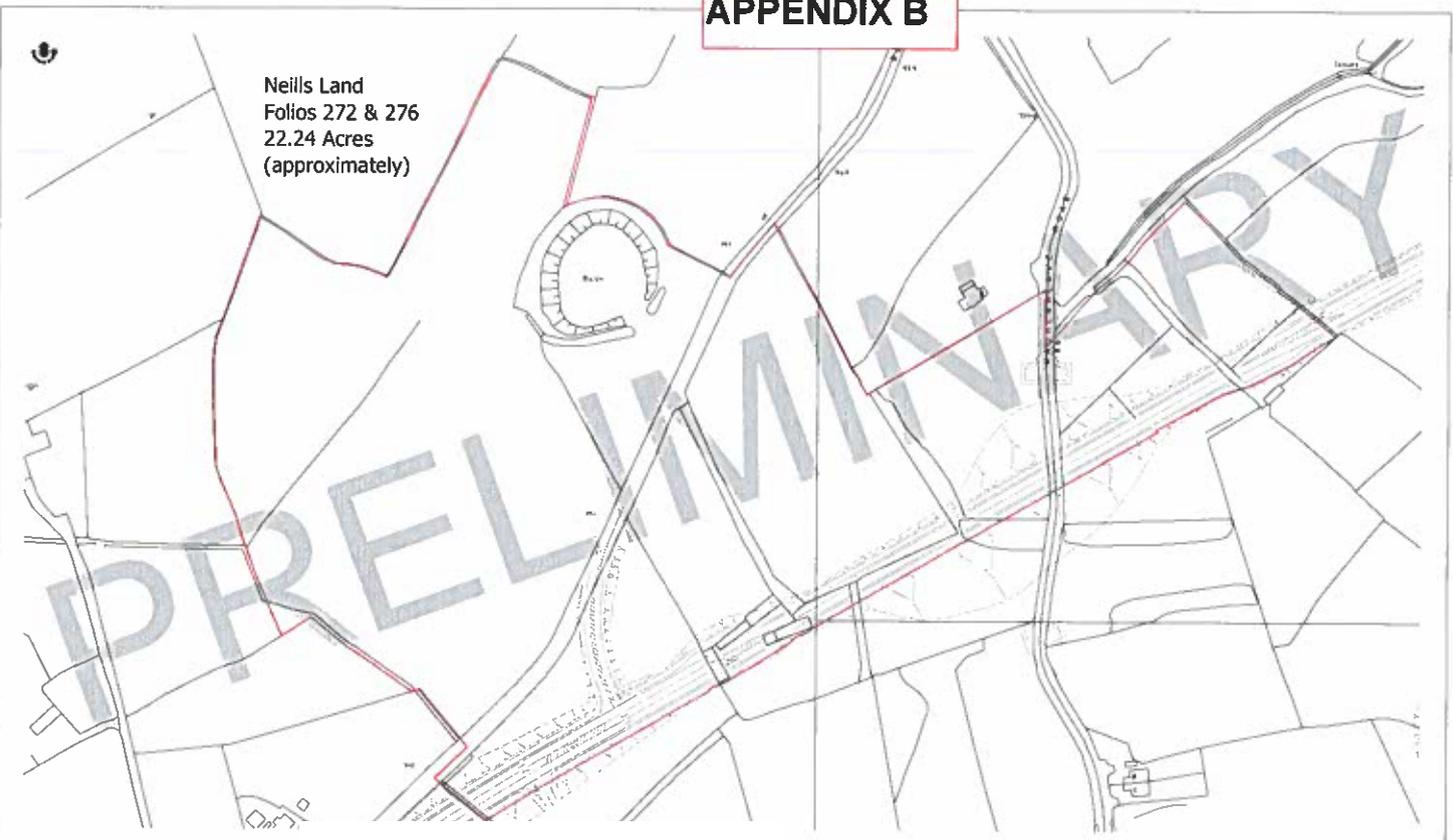
Director of Regional Planning

Encl

Cc Council Chief Executives

APPENDIX B

Neills Land
Folios 272 & 276
22.24 Acres
(approximately)



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PRELIMINARY

<table border="1"> <tr> <td>28-11-12</td> <td>28-11-12</td> </tr> <tr> <td>Lands of North Lisburn</td> <td>28-11-12</td> </tr> <tr> <td>Neills Land Draft Outline (roadway inclusive)</td> <td>1:2500 - A4</td> </tr> <tr> <td>2896-070-01-MUDO</td> <td>OSN/C.N.A</td> </tr> </table>		28-11-12	28-11-12	Lands of North Lisburn	28-11-12	Neills Land Draft Outline (roadway inclusive)	1:2500 - A4	2896-070-01-MUDO	OSN/C.N.A	<p>29</p>		<p>Alan Patterson Design</p> <p>Design team: (1) Alan Patterson (2) Alan Patterson (3) Alan Patterson</p> <p>For: Alan Patterson 123 Main Street Belfast, Northern Ireland</p>	
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