



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 that 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) 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 (8)(dPS)

Client: Porter

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 Porter Homes is a major house builder in the LCCC area. We have made a representation to the Preferred Options Paper (POP) seeking the uplift in the Housing Requirement calculation and for additional lands to be allocated for housing on lands at Lisburn, Hillsborough, Carryduff, Drumbeg, Ravernet, Ballyskeagh and Lower Ballinderry.
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 our POP Submission at **Appendix B** which includes maps of our client's various sites.
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; limited scope for new development in the greater Urban Area; Carryduff has sufficient land remaining for housing to meet the requirements; Hillsborough has a good supply of undeveloped housing land; villages can accommodate small housing estates and small settlements have potential for small scale housing. These statements in Appendix D are unconnected to whether there is a need to expand the settlements 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 Spatial Strategy (4A) of the Plan cannot be found to be sound if it is based on a flawed approach to Housing Requirement and housing land supply. There is scope that some settlements should be given a boost in terms of housing land supply. Plan Objective 4A) seeks to support towns and small settlements providing homes and services appropriate to their role in the settlement hierarchy whilst protecting their identity from excessive development. However, the flawed Housing Requirement figure prevents the balance being struck between supporting small towns and protecting them from too much development. If there is a need for a higher Housing Requirement, the Spatial Strategy needs to set this out and allocate the additional housing based on a robust strategy.

13. 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.

14. 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.

15. 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 towns such as Hillsborough 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 uHGIs, then towns such as Hillsborough, Carryduff and Drumbeg, Ravernet and Lower Ballinderry have the potential to experience increased house prices, higher private sector rents and increased housing stress.

16. 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

17. 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.
18. 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.
19. 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

20. 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.

21. 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?

22. 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.

23. 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.

24. 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

25. 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.

26. 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

27. We have set out in our POP submission an initial case for additional housing lands in a number of settlements. While the debate about land suitability will be held in detail at the Local Policies Plan Stage, we would note the following in comments made in Technical Supplement 6 Countryside Assessment (T/S 6) which provides Settlement Appraisals. Maps of our client's lands are at **Appendix**

B. In respect of the 7 settlements our clients seeks lands to be included in:

- a. T/S 6 identifies that there remains housing lands in **Hillsborough**, however, our client is currently building homes at Carnreagh and foresees demand on the north side of the Carnreagh Road. The Settlement Appraisal of T/S 6 does not identify any environmental constraints on this site, which would provide sustainable housing land in close proximity to Saddler's Hall. While T/S 6 raises comments by NI Water the site would be a modest size and would not cause an issue for sewerage capacity. The site would be a rounding off of the settlement limit on the northside of the town which sits alongside existing housing on the northside of the road. These lands should be included for housing in the Plan;
- b. T/S 6 identifies environmental constraints on the expansion to the north of **Carryduff**. Our client's lands are to the south of Carryduff at Killynure Avenue. T/S 6 identifies a concern regarding ribbon development to the south. This would relate to the Saintfield Road and the Ballynahinch Road. However there would be no concerns regarding ribbon development along Killynure Road. As highlighted in our POP submission, part of the proposal lands would be made available for community infrastructure such as a new school. These lands should be included for housing in the Plan;
- c. T/S 6 considers the character and development potential of **Drumbeg**. It notes that there is development potential along the eastern edge of the western village node. This expansion area could be extended to include our client's lands. There are constraints on new connections to the sewerage network, however the site can be designed to provide on-site package treatment plants to address any concerns of the sewage capacity. As set out in our POP submission these lands could be used to provide additional homes, local community services and a retirement village. This is particularly important given the aging population of the LCCC area as set out in T/S 1. These lands should be included for housing in the Plan;

- d. T/S 6 in respect of **Ballyskeagh** the Settlement Character appraisal finds there *“is limited land supply remaining of approximately 0.2hectares in the existing settlement to accommodate future development opportunities”*. The lands identified as suitable for development would be our client’s lands at the southwest of the settlement and is available for development. These lands should be included for housing in the Plan;

- e. T/S 6 in respect of **Ravernet** notes that *“development opportunities could be possible to the south-west of the village along Carnbane Road”*. This would be our client’s lands which has been highlighted in our POP. It was previously zoned for housing land. While T/S 6 notes there to be over 2ha of land supply remaining in the settlement limit, it is unclear where this land is and whether it is actually available. As noted in the POP paper PP2 the Council found no land available for housing. The proposal site will round off the village settlement limit. Again in regard to sewerage capacity it is noted that some restrictions are applied, but it is not the case that connections are not being provided. These lands should be included for housing in the Plan;

- f. T/S 6 does not set out any environmental constraints that would prevent expansion of **Lower Ballinderry**. T/S 6 takes the position that as lands remain within the existing settlement limit, new development should be resisted. This approach has no regard to what land exists and whether it is available and developable for future housing growth. As set out in our original submission our client’s lands abut the settlement limit and are bound to the north by the river forming a defensible boundary, and they are in close proximity to the local school and within easy walking distance to the other services in the village. These lands should be included for housing in the Plan;

- g. Our client’s lands at **McKinstry Road, Lisburn** are also highlighted at **Appendix B**. The McKinstry Road lands would offer an opportunity of additional land to the north of the City. There has been limited increase in housing to the north of the City in recent years and with the completion of the Lisburn North Feeder Road this makes this area attractive for new home development. The infrastructure in the wider area, with good access to Lisburn, Dunmurry, Belfast, the M1 motorway and the Belfast-Lisburn railway line means it would be sustainable to allocate these additional lands within Lisburn City. Bringing the settlement limit to McKinstry Road would form a defensible boundary. The setting of the lands are ideal to provide a quality residential layout. These lands should be included for housing in the Plan;

28. While we anticipate further discussion on land zoning to take place in the Local Policies Plan, and there may be a call for sites for future housing as stated in T/S 2, our client is putting all these lands forward for meeting the Housing Requirement for LCCC.

Policy HOU 1

29. Policy HOU 1 provides three overly prescriptive criteria for future housing lands. It should include the word “normally” to allow for exceptions to the policy. This policy will raise issues for development of housing on whiteland sites. The policy suggests that housing can be built in “*designated ... small settlements*”. It should be confirmed that this policy allows for all lands in all small settlements to be suitable for housing subject to other general policy compliance.

Landscape Wedge and Strategic Policy 19

30. We note that the Council propose a Landscape Wedge in Lisburn (MAP 4), and Strategic Policy 19 notes that these landscape wedges have been carried over from draft BMAP. Our client would object to the Lisburn Landscape Wedge insofar as it includes his lands at McKinstry 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.

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

- a. Provide a robust objective assessment of Housing Requirement;
- b. Provide a Housing Allocation that provides a balance between supporting main urban areas but also providing sufficient housing allocations to smaller towns and small settlements to allow town to grow and thrive and to meet the needs of the changing population profile of LCCC;
- c. Clarification should be provided in respect of policy HOU 1 as outlined above;
- d. included our client’s various sites inside their respective settlements and zoned for housing use.

Appendix

- A Working Paper on Plan Strategy Housing Matters
- B POP Submission

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 Council's 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. Council's 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)). DfI'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 DfI 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 DfI 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 DfI has identified a higher housing requirement than the Council, and that DfI 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 uHGs 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 rHG 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

Email

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

Lisburn and Castlereagh City Council Local Development Plan**Response to POP Paper**

Ref: 16/11 (8)

Client: Porter

1. We make this submission on behalf of Bill Porter. Mr Porter is a major house builder in Lisburn and Castlereagh and is currently developing lands within the Council area. Going forward Mr Porter intends to continue development in the City of Lisburn, and in the towns of Hillsborough, Carryduff, Drumbeg, Ravernet and Ballyskeagh. Lands owned by Mr Porter that are suitable for future expansion of the settlements of Hillsborough, Carryduff, Drumbeg, Ravernet and Ballyskeagh are at Annex A.

Q.1. Do you have any comments on the opening Section 1-4 of the Preferred Options Paper that should be taken into account when preparing the Plan Strategy?

2. The context of Lisburn needs to be more detailed and more comparison with Northern Ireland and the other Northern Ireland Council areas should be set out. It is not clear where LCCC sits in a NI context. Is the 13.1% growth in population high compared to other Council areas? In housing terms the background information is limited. The revised HGI (rHGI) figures are not from 2015, instead they are published in 2016 and based on 2012 data. The figure of 13,300 is a modest uplift on the rHGI figures which are themselves a dramatic reduction from HGI figures published in 2012 in the RDS. The language in the Plan implies something unusual that 'whilst' household size decreases, household numbers will increase. That is the normal course of events as the two are linked.
3. The Council area clearly has many strengths which includes high levels of economic activity, and a high level of inward migration as well as important infrastructure supporting substantial potential for economic growth. The Plan should reflect this important strategic context, again in comparison to other Council areas.

Q.2. Do you agree with the aims of the Council's Growth Strategy and Spatial Framework as outlined in Section 5 of the Preferred Options Paper?

4. We consider the objectives are not ambitious enough. The first objective should be changed as follows:
 - a. Support the significant growth and regeneration of our city, towns and villages ...'

Q.3. Do you agree with the cross-cutting themes outlined in Section 5 of the Preferred Options Paper?

5. We consider the issues of economic growth and housing needs are cross cutting themes, and the Plan should seek to address how the economic growth of the area can attract new people and families into the area and how these can be accommodated in the demand for housing and indeed the supply of attractive family homes.
6. We also consider the theme if 'enhancing quality of life' should include reference to provision of quality homes for the ageing population in the area.

Q.6. Key Issue 1: The Settlement Hierarchy

7. We agree with the hierarchy and the towns included within it.

Q.7. Key Issue 2: Facilitating Future Housing Growth (Settlements)

8. We disagree with the fact that the POP does not offer a range of options for future housing need and presents the rHGI figures, pro rata rolling forward these figures, to suggest that the LCCC area needs only 13,300 dwelling over the Plan period.
9. We also note that the POP suggests a modest 10% allowance to provide for any shortfall in the housing supply over the Plan period, and that 75% of this increase is proposed to be allowed at West Lisburn/Blaris as a replacement of employment land.

10. The POP suggests that of the 330 remaining, 11% (i.e. 36 houses) could be spread between Carryduff, Moira and Hillsborough. This level of housing allocation is nothing more than a token gesture. That is simply windfall allowance and wholly unrealistic.
11. We do not consider the evidence base is supportive of such a limited number of dwellings for the area. We have included a Working Paper on Housing Matters (**Annex B**) that discusses this topic.
12. We consider significant more work is required to reach a realistic and robust housing growth figure. We consider the evidence base at present to be limited and overly pessimistic.
13. We disagree with the approach that the only option presented is the application of the rHGI figures. These are only a guide and should not be slavishly followed.
14. Whilst previous house building rates are not the sole factor that should be used to predict future demand, even considering the build rate set out in the POP Table 3 shows that the area is already under performing. Page 42 states that between 2012 and 2015, 1,544 units have been built in the area. This is a rate of 515 units per year. The rHGIs require of 9,600 units over 13 years which is an annual requirement of 738 units per year. This indicates that even on the constrained figures, LCCC is already in a backlog position, with 671 units less built than the 2,215 requirement.
15. If the build rate of 515 units per annum continues, it will deliver only 6,695 units by 2025 (only 70% of the rHGI figure). To reach the rHGI figure in 2025, the Council needs to significantly boost house building in the area and achieve a build rate of 805 units per annum. To achieve this land must be released that is free from constraints, available and has minimal lead in times.
16. At this time there is no evidence on whether there is sufficient land available now to deliver the housing that the LCCC area will need over the Plan period. Large areas of Lisburn are strategic sites, that will take time to deliver because of infrastructure up grades and the fact that NI's largest house builders can only deliver up to 25 units per year. To avoid a shortage of housing supply over the Plan period, it is necessary to increase zoning in smaller

settlement lands to spread house builder activity and provide housing that can meet short term demands.

17. Also despite the issue being raised in the Position Papers, no housing demands of elderly people have been addressed in the POP. Our clients site at Drumbeg is ideally suited for a retirement village complex that could meet the needs of elderly people as part of their own community area. It is an attractive area to retire to. A map of the potential layout is at **Annex C**.

18. The POP does not address the concern that the allocation of the RDS HGI in 2012 (as shown in the PP 2), for Lisburn and Castlereagh Council areas was between 18,000 and 22,000 new dwellings. To now plan for only 13,300 with potential for a 10% over zoning equates to an allocation of 14,630. That is 20% below the Council's lowest estimates of the previous 2012 HGIs.

19. The Council housing need figures need to be linked to the future economic growth and the Council's growth strategy, which as mentioned above is a cross cutting theme. The housing need figures need to be more detailed and considered in the draft Plan Strategy and allow proper interrogation.

20. At the least they must include a range of scenarios looking at:
 - a. high and low level population and household formation rates;
 - b. needs of the elderly;
 - c. impacts of net inward migration; and
 - d. scenarios based on varying levels of economic performance growth.

21. The Plan, must also address the issue of land availability considering factors such as:
 - a. Availability and suitability of land;
 - b. Yields;
 - c. Lead in times;
 - d. Windfall rates;
 - e. Build rates; and
 - f. Site constraints.

22. Based on the evidence at present a realistic housing need figure is set out below.

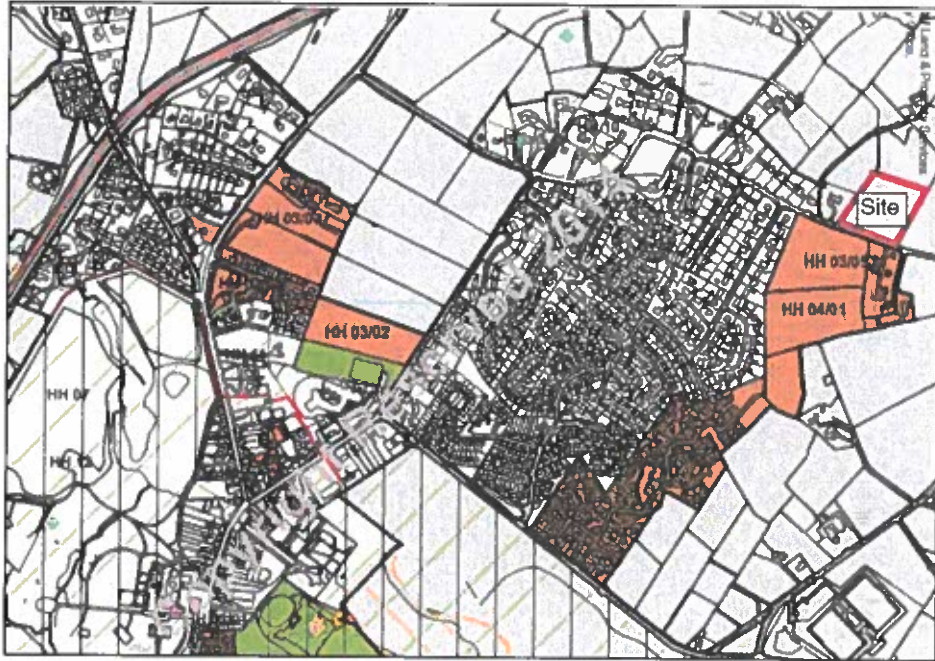
Minimum Housing Requirement 2015-2035	
RHGI	9600
Annual Build Rate	738
Basic Plan requirement	13300
Backlog	671
Plus 20% allowance for over zoning/persistent backlog	2794
Sub Total	16766
Windfall 5%	838
Total	17604
Plus 5 year to 2035	5868
Total by 2035	23472

*Other Councils are predicting housing land supply to 2035 to ensure continuous 5 year housing land supply.

23. In general we consider the housing allocations do not have any correlation to the Council's economic growth strategy and as we set out in the Housing Paper, in relying upon the rHGIs as a guide the Council are being overly pessimistic.
24. In taking zoned land into account the Council needs to be confident of its ability to address the backlog of housing and understand lead-in times, viability and deliverability of housing land in the area. For example, housing land in Lisburn is reliant on major infrastructure requirements and it would be important that a buffer supply of housing is included in the allocation to act as a contingency should these lands fail to come forward.
25. Having regard to the Council's proposed allocation of the 1,330 additional units, which we consider to be too limited, we further consider the apportionment of any future housing land needs to be more evenly spread among the towns and villages, in particular the settlements of Hillsborough, Carryduff, Drumbeg, Ravarnet and Ballyskeagh. Our client owns land in each settlement and we provide maps at Annex A showing the location of each site and comment further below on each.

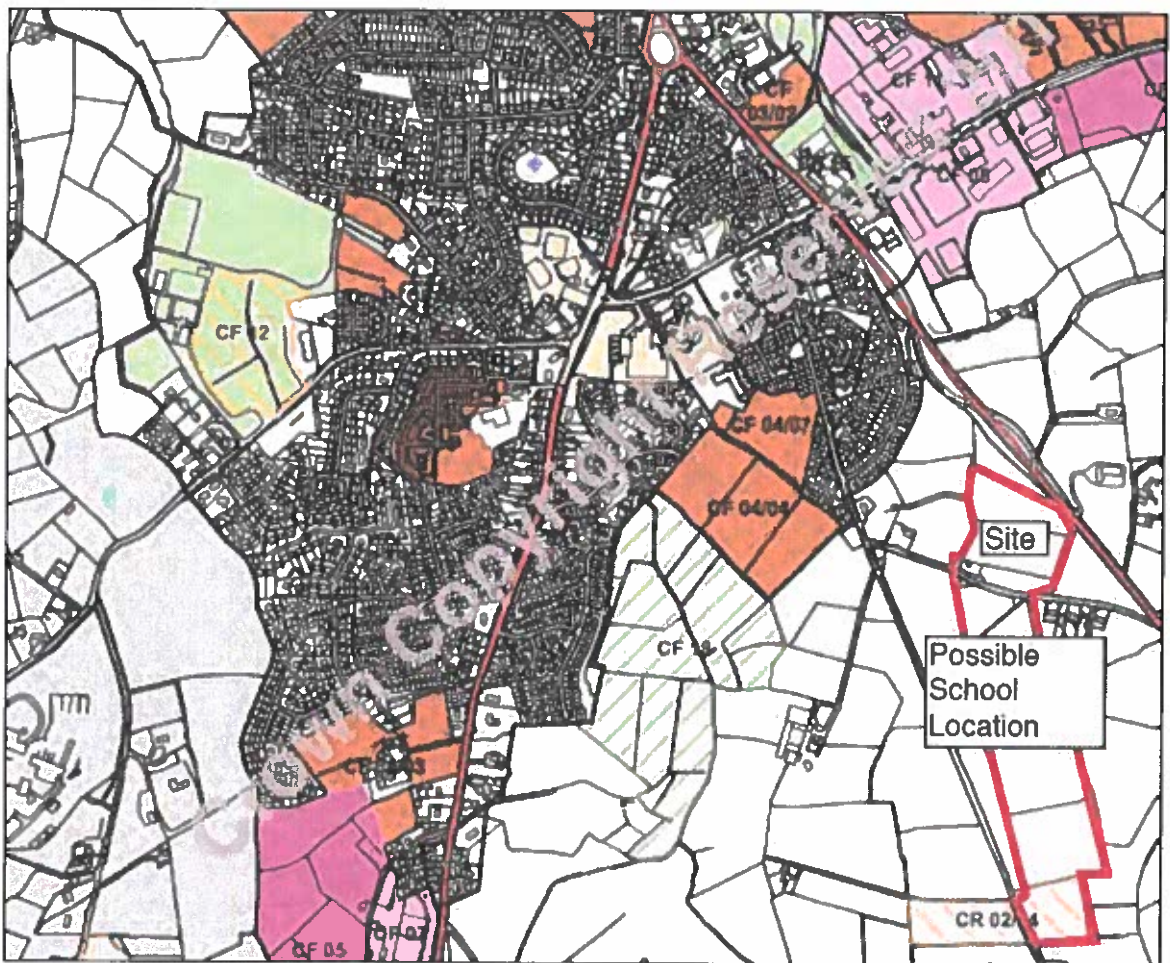
Hillsborough

26. Our client is currently building homes at Saddlers Hall, Carnreagh Road and own lands directly opposite. This single field would allow for a modest expansion of the settlement boundary in an area that is already very popular with new home buyers.



Carryduff

27. Carryduff is an increasingly popular area with people from south Belfast moving into the area to find larger family homes. The local schools in the area are considered to be reaching capacity and there is demands for new homes in a semi-rural location, with good links to the town centre and the main Belfast Road. Our clients land either side of Killynure Avenue, is within a short walk of Carryduff town centre and the services there. The lands to the north side of the Killynure Avenue are ideally suited for new homes, while the lands to the south could be made available for new community infrastructure such as a new school. It is notable that further along the Killynure Road a new Church has recently been constructed. This would provide local services to residents of the area.

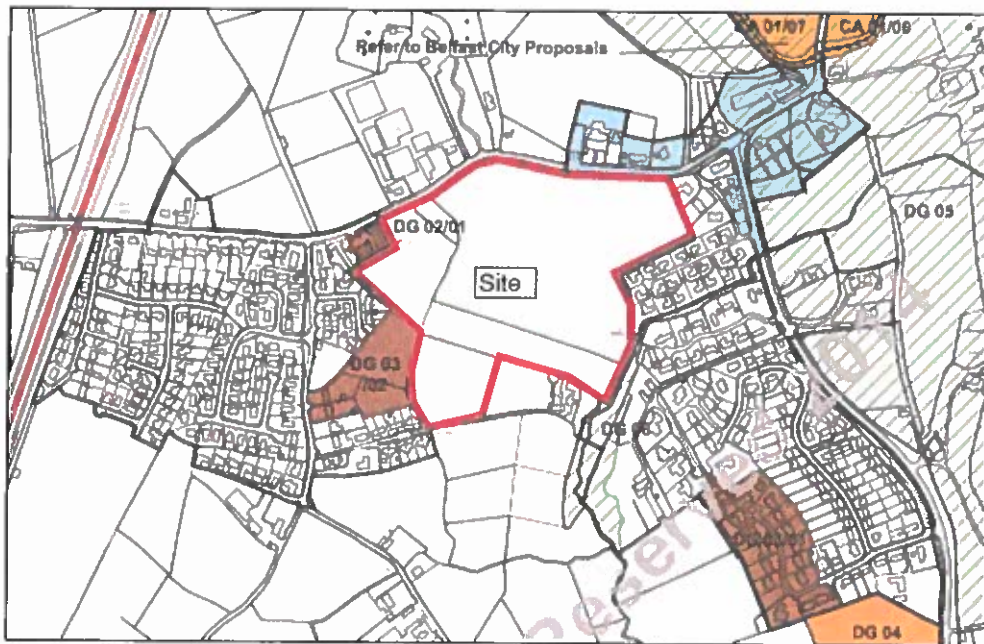


Drumbeg

28. Our client owns land in Drumbeg, which is ideal for a retirement village for the LCCC area. A concept plan of the village is at Annex C. The lands are of adequate size to accommodate the necessary variation in homes and associated facilities such as a local shop and health care services. The lands are well suited to allow improved access to the existing zoned land at Zenda Park, providing access onto the Ballyskeagh Road.

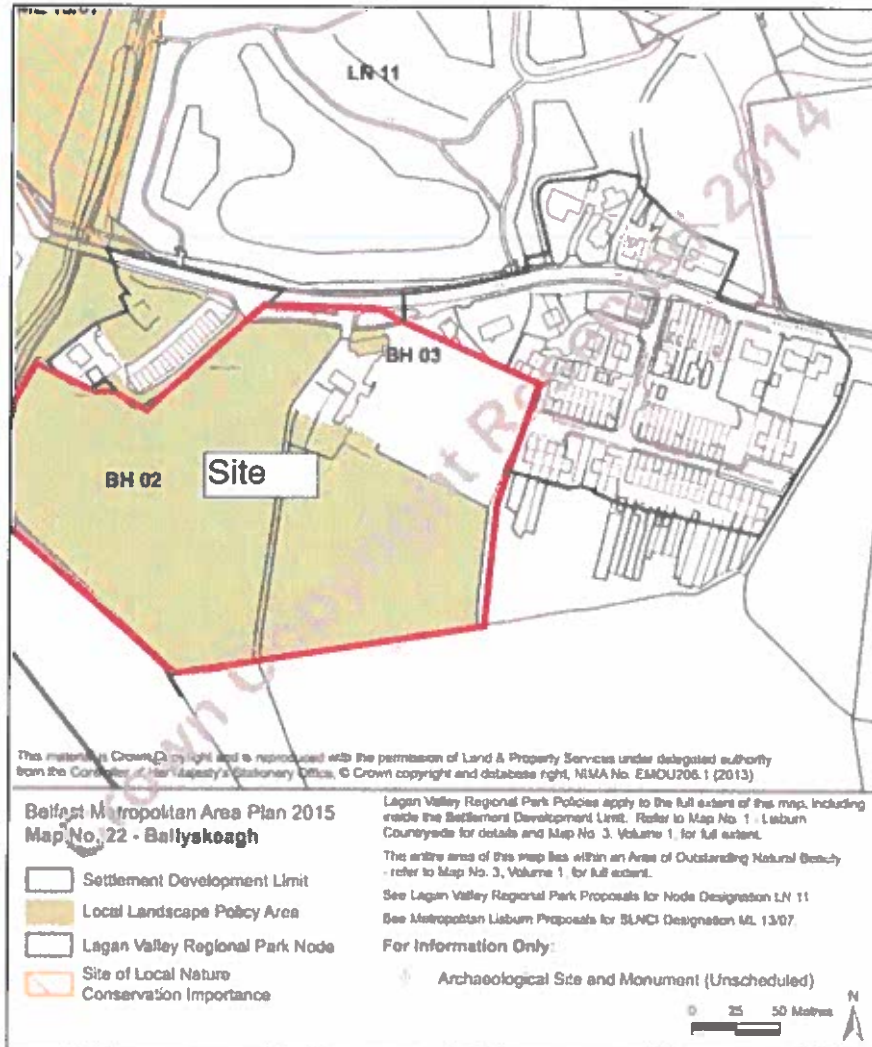
29. Development along the north side of the Ballyskeagh Road already links the two housing areas. The proposal site can be zoned in full or in part to deliver additional housing.

30. If the Council considered the retirement village a strong proposal, our clients would be willing to have further detailed discussions about the concept and delivery of this scheme.



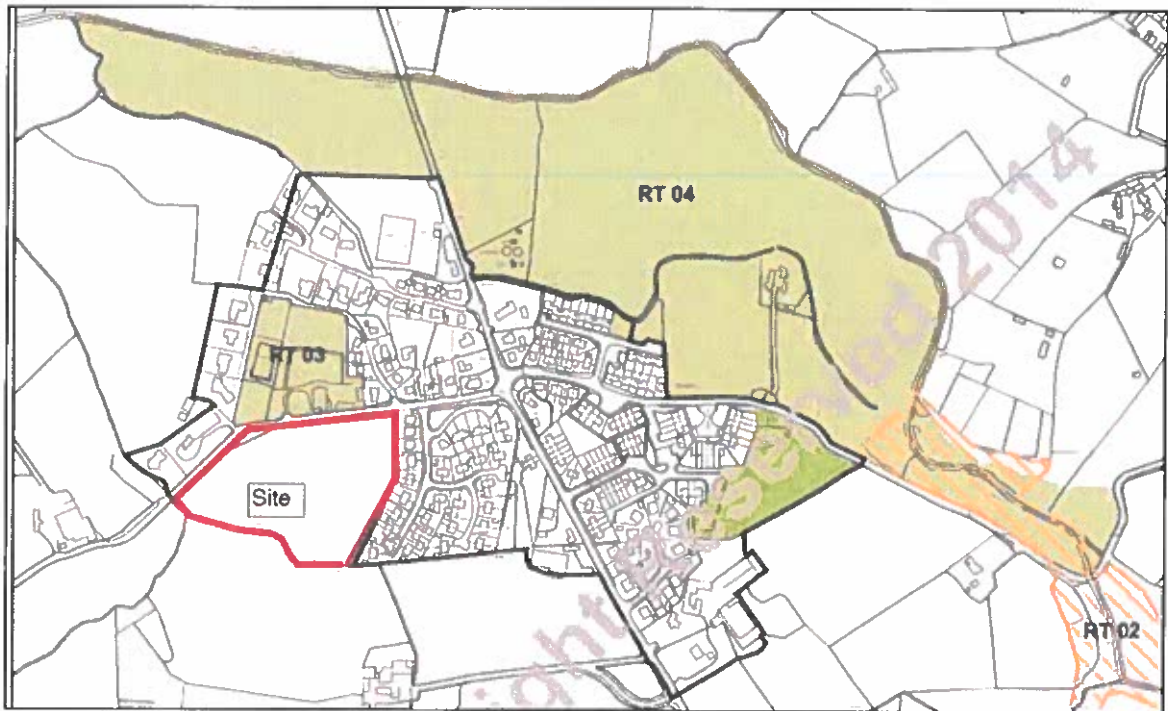
Ballyskeagh

31. Ballyskeagh is a small settlement in the LCCC area and our client's land are located abutting the southwest corner of the settlement boundary. They are a derelict group of dwelling and farm buildings, prime for regeneration and redevelopment. Access to the Ballyskeagh Road is already available. Zoning these lands will remove an eyesore in the area and support a modest increase in the local population.



Ravernet

32. Ravernet is noted by the Council in PP2 to have no available land for housing. Our client's site was previously zoned housing land. It remains a suitable and available piece of land that abuts the settlement limit and is prime housing land, that would support the expansion of the settlement over the next 15-20 years. The site will round off the settlement limit and is the most appropriate location for development avoiding other policy designations.



Conclusion

33. At present the housing need allocations fail the test of soundness as they are not based on robust evidence and are not realistic and have not considered appropriate alternative scenarios.
34. We would be keen to have discussions with the Council on the approach to reach a more robust housing need allocation, based on up to date and reliable evidence.
35. Our client is a major house builder in the LCCC area and has a number of sites suitable and available to support LCCCs housing land needs over the Plan period and beyond. We would welcome inclusion of these sites in the Plan and are willing to discuss with the Council how these sites can be brought forward.

Annexes

- A. Site Maps (X 5)
- B. Working Paper on Housing Matters
- C. Retirement Village Concept Scheme

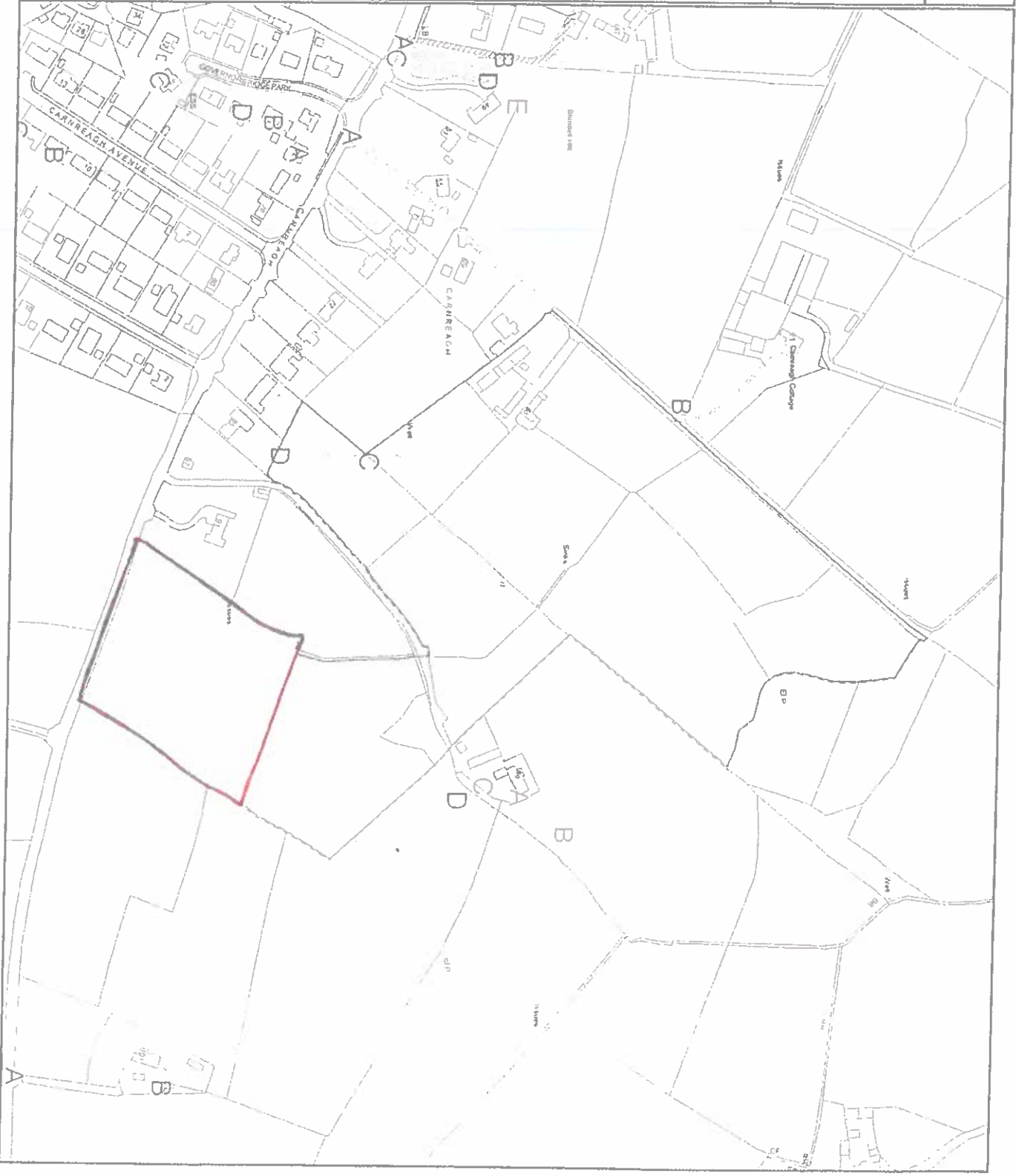


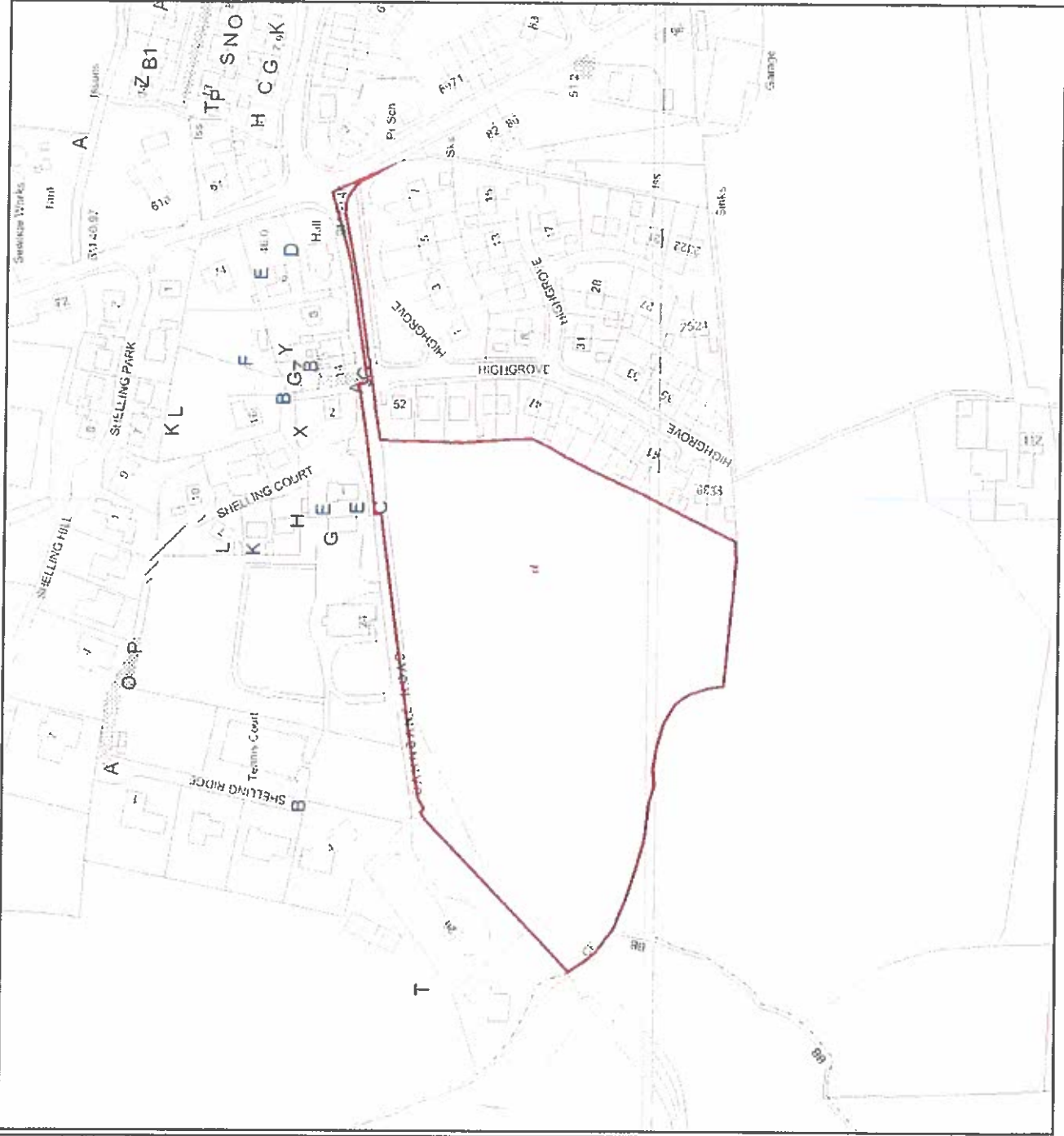
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 Map Ref(s): 18402NW, 18402NE, 18402SW, 18402SE

Key to folio labels

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Land & Property Services
 THE LAND REGISTRY


Date: 05 Nov 2014
 County: Down
 Folio: DN123903
 Scale: 1:2500
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 Your Ref: MB/05503547
 Map Ref(s): 16514SE.18402NE
 Sheet 1 of 1

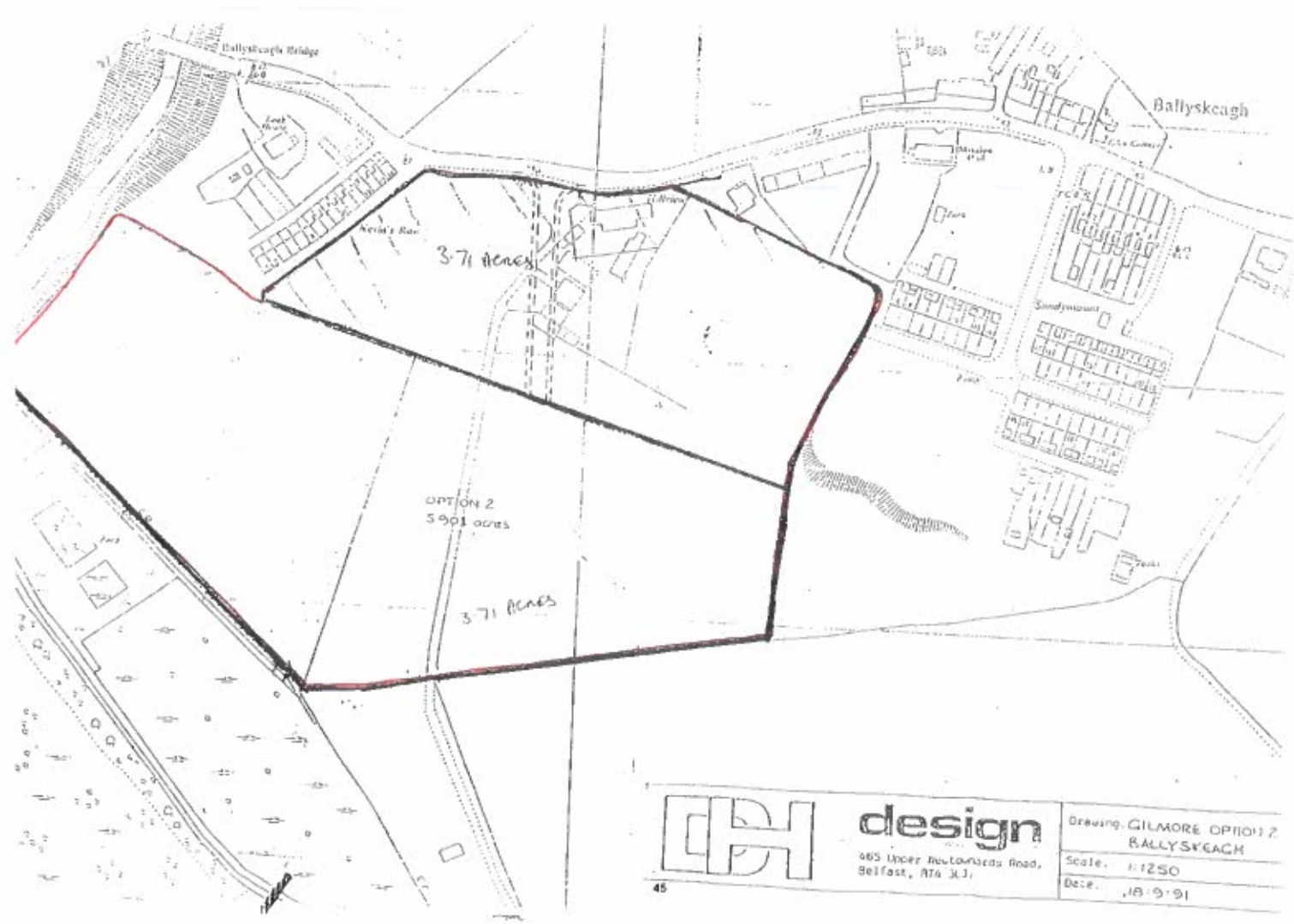
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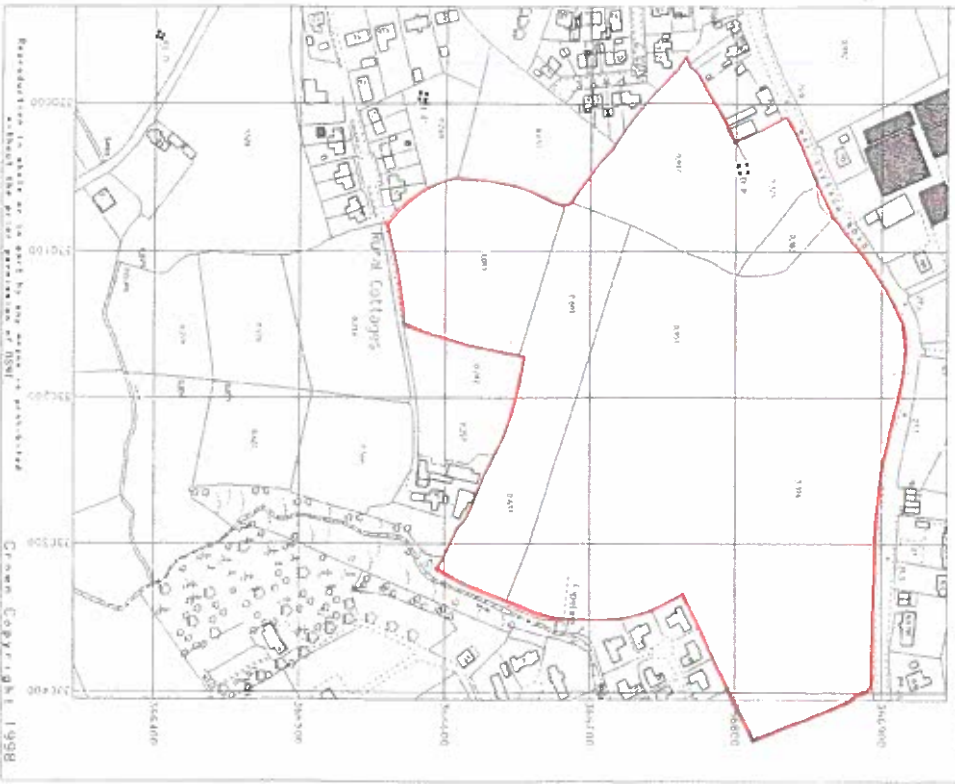
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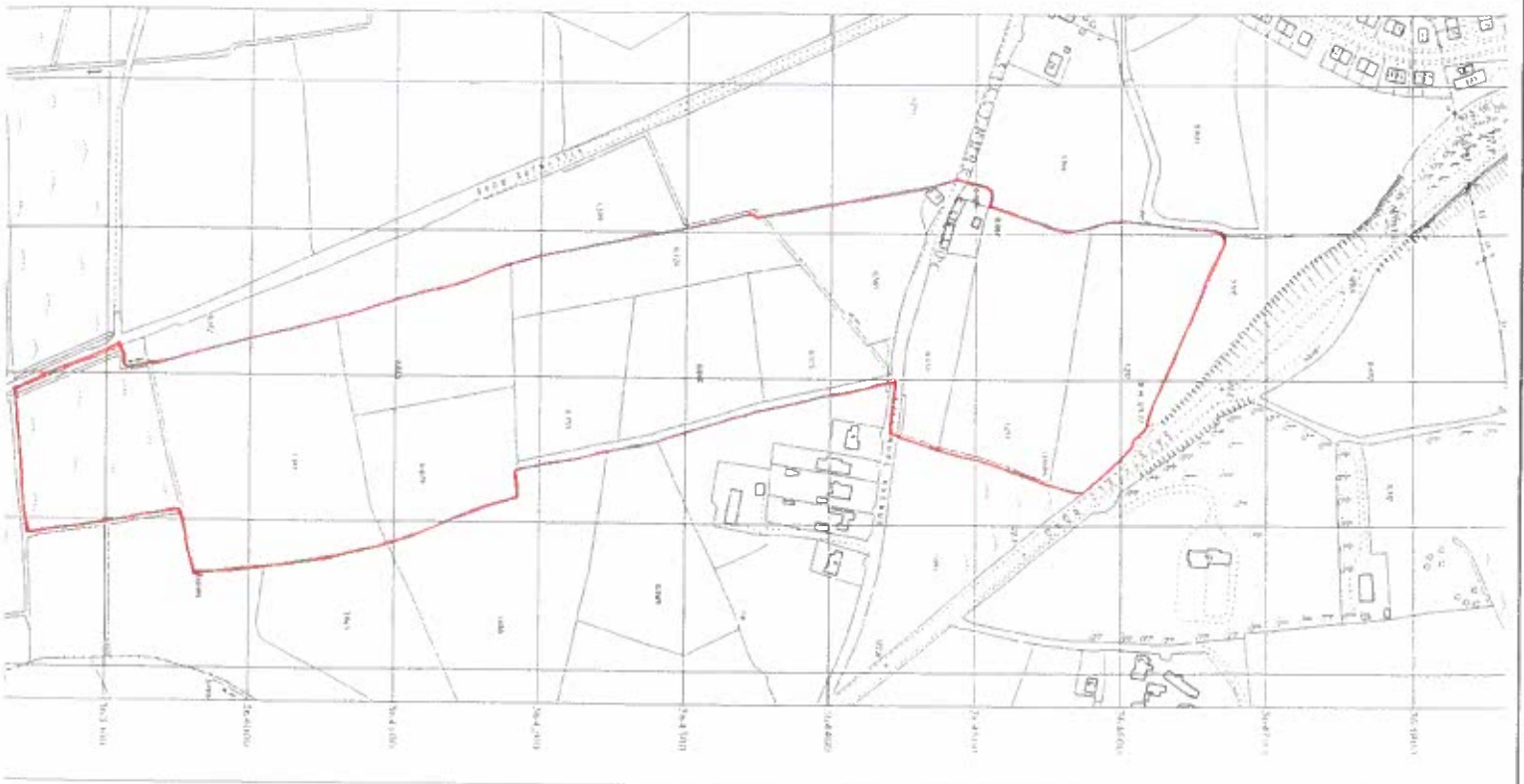




Ordnance Survey of Northern Ireland
ACE MAP

1:65,000
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27-JAN-98





Annex B - Working Paper on Housing Matters

Revised Housing Growth Indicators

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

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

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

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

² 2012-2025 figures.

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

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

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

Source: Office for National Statistics

Notes:

1. Figures may not sum due to rounding.

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

Position Papers

14. The Council has produced two relevant Position Papers (PPs). The Council's PP1 Population and Growth sets out background to the population projections. It notes (Table 5), that persons aged 40-64 and 65+ in the council area will be above the NI average. PP 1 para 4.10 notes that the number of elderly is a key factor in declining average household size. It suggests that this has been considered in the HGIs but does not explain how this has been accommodated. It continues that the LDP has a role to provide development land to meet the indicators and facilitate housing units to meet the needs of the elderly, and specifies some of the approach that the LDP might take.

15. PP 1 para 4.18 notes that the Council area had a lower household size than the NI average in 2011 (2.52 in LCCC compared to the higher size of 2.54 in NI generally). The projection of population for LCCC set out at para 4.54-4.58 provides a broad overview of population and household growth. The figures being used under the 2012-based projections for Northern Ireland are accepted to be a recessionary trend based figure. Reliance on data that is based on a downturn is an unsound basis to predict changes over the Plan period.

16. PP 1 para 4.54-4.55 implies that population growth in future will be driven by natural growth and there will be a decline in migration. There is evidence to the contrary. Antrim and Newtownabbey's emerging LDP shows below that Lisburn's future population growth is driven by net inward migration. It shows that Lisburn is likely to experience the third largest population growth in Northern Ireland Councils. The Council's PP should have addressed these factors. We also note that the Table below shows LCCC with a slightly higher population projection than PP1 has, and this should be considered as clearly the evidence shows the Council's figures to be a minimum.

17. Para 4.57 indicates that by 2030 average household sizes is predicted to reduce to 2.46 persons. However, the Council's PP3 on Employment and Economic Development (para 4.19) states that average household size is '*predicted to remain below the NI average at 2.17*'. This is a matter that requires clarification as the supporting evidence should be using consistent assumptions.

Table 2.28: Projected Components of Change by LGD (2016 - 2030)

LGD	Projected population mid-2016	mid-2016 to mid-2030			Projected population mid-2030	% Change
		Natural Change (i.e. births - deaths)	Net Migration	Total Change		
Antrim & Newtownabbey	140,989	6,823	-2,411	4,412	145,401	3.1%
Ards & North Down	158,886	515	3,699	4,214	163,100	2.7%
Armagh City, Banbridge & Craigavon	210,318	18,649	9,447	28,096	238,414	13.4%
Belfast	339,796	23,357	-11,757	11,600	351,396	3.4%
Causeway Coast & Glens	143,531	4,406	-1,039	3,367	146,898	2.3%
Derry City & Strabane	149,780	10,669	-9,280	1,389	151,169	0.9%
Fermanagh & Omagh	116,146	6,246	408	6,654	122,800	5.7%
Lisburn & Castlereagh	141,513	7,445	9,660	17,105	158,618	12.1%
Mid & East Antrim	137,732	3,023	1,409	4,432	142,164	3.2%
Mid Ulster	145,930	14,951	4,182	19,133	165,063	13.1%
Newry, Mourne & Down	177,994	14,956	2,044	17,000	194,994	9.6%
Northern Ireland	1,862,615	111,040	6,362	117,402	1,980,017	6.3%

Source: NISRA

18. However, even with the subdued predictions being employed, the figures suggest that LCCC will continue to have below NI averages of household sizes. It is unsurprising that PP 1 notes at para 4.58 that the NISRA household projections are broadly in line albeit slight lower than the RDS 2035 figures. That is because the RDS 2035 figures use the 2012 figures as a base source of data.
19. What is surprising is that the PP1 does not state what arguments or evidence was presented to the DfI in response to the dramatic reductions in HGIs when they were being reconsidered in 2016. Nor does the PP1 set out the dramatic decline in HGIs by over one third between the 2012 published RDS figures and the 2016 RDS figures. The PP does not question how the figures could be so dramatically different and what the consequences of that is for the Plan.
20. Council's Position Paper 2 Housing and Settlement (PP2) (para 4.2) provides evidence that the population of Lisburn City Council area grew by approximately 10% between 2001 and 2011 and Castlereagh growth was 1% over the same period. The PP2 notes that both districts have followed the regional trend of a decline in the proportion of children and an

increase in the pensioner aged population. This will have implications for the type and number of dwellings needed.

What is the Housing Demand in The Council Area?

21. In terms of the housing demand in the Council area, PP 2 deals with some of the relevant topics in considering future housing demand, but does not set out clearly what the future housing demand in the area is. It does (para 4.2 and 4.33) address the population and household projections, but as shown above, these are minimum figures. PP 2 para 4.34 indicates that the LCCC population could grow by 15.4% between 2015 and 2035. Again, this does not place this growth in context of what it will be made up of (i.e. migration or natural growth etc). Nor does it set out how this compares to other Council areas in Northern Ireland. It translates this in to an additional 8,009 households being created in the LCCC area between 2015 and 2030.

22. PP 2 para 4.35 makes what appears to be the incorrect assumption, that the 2012 population based figures are based on unprecedented growth trends. RDS/DfI revised HGI paper notes that the 2012 projections are lower than the 2008 based projections. The 2012 figures are lower than the 2008 figures and reflect the results of the 2011 Census when the recession was at its deepest. As such the figures are not optimistic as the PP2 implies, but the opposite. A more realistic long term trend might be the continuation of the 2008 based population figures, which consider growth from 1991-2001.

23. PP 2 Table 22 and 23 set out the Council's HGI estimates for the Council areas of Lisburn and Castlereagh. Table 22 notes that Castlereagh had a HGI of 6,684 and Lisburn had a HGI of 12,010, giving a combined HGI of 18,694. However, the combined allocation for the LCCC area is 13,460 based on population share in 2013. No explanation is provided as to why there are 5,200 dwellings less needed in the rHGI figures for LCCC, when compared to the previous two Council areas. Para 5.16 suggest the Council areas lost about 1280 dwellings to Belfast, but that would only equate to about 3,200 people, and does not explain the dramatic loss in population or the rHGI figures presented.

24. Table 23 provides for a HGI allocation of 22,577 units in the combined LCCC area.

25. PP 2 para 5.21 indicated that the DRD were revising HGIs, and that information is now available, but it does not appear to have been incorporated into PP 2 figures.
26. As mentioned above, these rHGI figures have not been tested in the public domain. There is no analysis of how realistic the figures for LCCC are. We understand that the Council did not provide any comments to the draft figures when they were provided to them.
27. The RDS (para 3.42) very clearly notes that the population of Belfast is forecast to fall over the next two decades and the population decline needs to be reversed. In this regard, the HGIs at Appendix B of the RDS 2035 were calculated based on growing the population of Belfast, not on the projected population decline. Indeed, current evidence is that the population of Belfast has increased beyond 300,000. Whether this is because of the enlarged boundaries for Belfast or natural growth, this again points towards population growth and not population decline that might support downward revision of HGIs. This is not explained by the rHGI paper.
28. Clearly the allocation of the new rHGIs of 9,200 for LCCC is dramatically worse than what was anticipated in the previous HGIs. As shown in PP 2 Table 22, the Council were anticipating the area would have in the region of 18,694 units based on population share of the BMUA. The rHGIs are just over half of what was allocated previously. In BMAP terms the reduction from 22,577 to 9,600 is a reduction of 57.5%.
29. No analysis is given in the evidence or indeed the POP as to the rationale for such a reduction, the implications that the rHGI figures are unrealistically pessimistic and what the implications for the role and function of the new Council area are.
30. It is difficult to agree that one of the strongest Council areas in Northern Ireland, which is strategically located on the outskirts of Belfast, should be faced with curtailed growth to such a degree, based on a single set of rHGI figures, which appears to contradict long term trends of the past.

Build Rates and Availability of Land

31. The Council's PPs and evidence base should be considering in more detail migration rates and growth scenarios that might influence demand, and factors that influence supply of

housing including build rates, release of land zoned for housing, land that has been zoned for housing and has not been released, where demand is greatest, lead in times, delivery of 5 year housing land supply, the need to make up the backlog of reduced housing supply in recent years, providing for latent demand, and demands of an ageing population.

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

Monitoring

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

Housing Supply

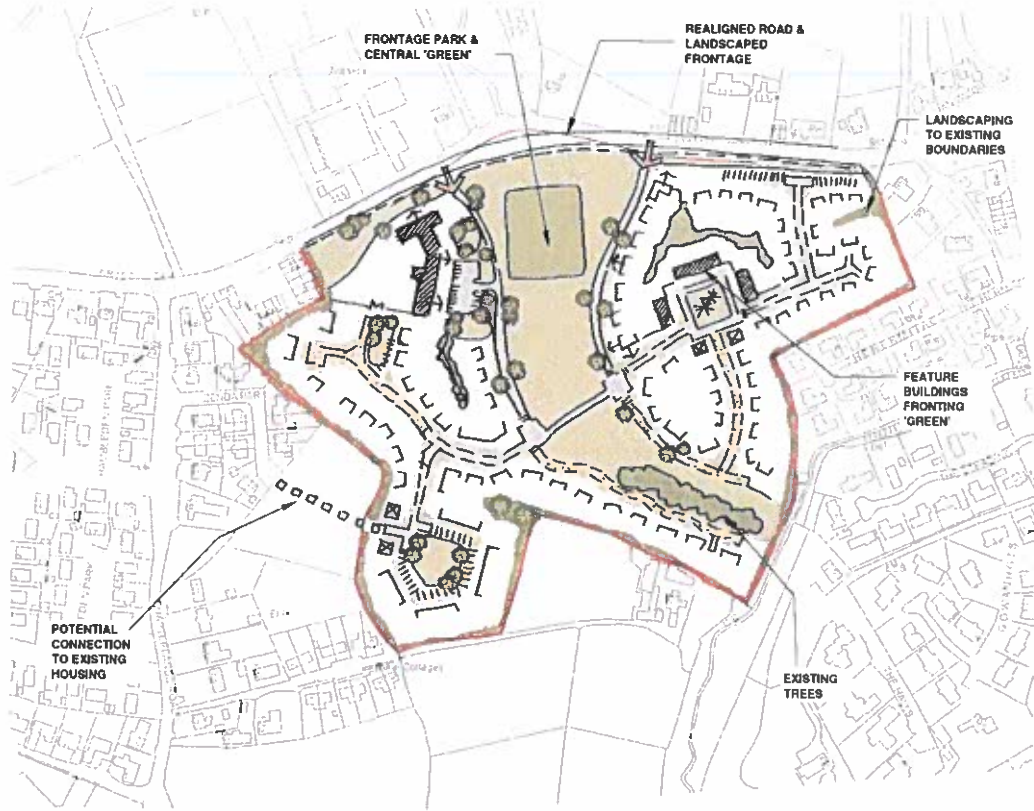
34. The evidence presented at PP2 Appendix 2 sets out the remain land for housing in various settlements. It shows that there is 18.2ha of land remaining in Hillsborough & Culcavy, but provides no analysis of the likelihood of this land coming forward for development. Similarly, in Carryduff the Council estimates that there is 55.49 ha available in Carryduff, but no analysis of whether these lands are all available. Simply being allocated does not mean lands will contribute to a 5 year housing supply over the Plan period. If lands are controlled by one house builder, they can only build about 25 units per year. Hence reliance on large site builder sites can be problematic for the local housing market. The Council must provide more detailed explanation of the availability of these lands.
35. The Table for the villages show that Drumbeg has only 1.58ha of land to be developed. However, again the Plan does not explain why these lands have not come forward. They relate to a single site, which may have constraints in terms of its access. For Drumbeg to support future growth in Lisburn there is a case of additional lands to be released.

36. Significantly Ravernet has no lands allocated as a Housing Policy Area, and as such none have been developed and none remains. Ravernet needs additional lands to be allocated.
37. In terms of the small settlements, it is again noted that Ballyskeagh has only limited land available for development. There is a case for additional land release to support the settlement of Ballyskeagh.

Conclusion

38. The Council's PPs need to:
 - a. Review clearly the population projections and household formation rates to ensure they are consistent and up to date and reflect long term trends;
 - b. Set out what the implications of the dramatic reduction in HGIs might have for the Plan and what the Council proposed to do to ensure that its growth strategy is achieved;
 - c. Set out how the needs of the aging population will be accommodated over the Plan period;
 - d. Set out the scenarios of how economic growth will impact the demands for housing in the area;
 - e. Assess the projected household formation rates at a local level and not arbitrarily accept the household formation rates applied in the rHGI, particularly when the evidence shows that LCCC will have below average household sizes in future;
 - f. Set out a range of scenarios based on household formation rates, properly interrogated to reflect the recessionary trends in household sizes, net conversion and to factor in additional housing need to attract inward migration to support and sustain the Council's economic growth strategy;
 - g. Provide a transparent and robust housing trajectory to demonstrate how the housing needs of the LCCC will be provided annually to facilitate monitoring and identification of issues in meeting housing needs to avoid overheating of the housing market; and
 - h. Set out how the Council intends to address the already existing backlog of housing which should be addressed during the first 5 years of the Plan.

39. The foregoing comments inform our views on the approaches to the housing issues set out in the POP.



PRELIMINARY

CLIENT	PORTER & Co
PROJECT	LANDS AT DRUMBEG
DRAWING TITLE	ILLUSTRATIVE SITE LAYOUT
SCALE	1:2500 @ A3
DATE	MAY 2017
DRAWN BY	AWP
DRAWING NUMBER	F4450-050-03-005



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 Tel: +44 (0)141 205 2542
 Fax: +44 (0)141 205 2444
 Email: info@alisonpeckinhalgh.com
 Website: www.alisonpeckinhalgh.com



Dear Sir/Madam

Preferred Options Paper Lisburn and Castlereagh Council

Further to our submission below, we would also like to bring the following site to the attention of the Council for potential inclusion in the settlement limit of Lower Ballinderry

This is a supplementary site that relies upon the same principal arguments advanced in the submission below and already supplied to the Council.

The arguments made in respect of housing needs and the need to provide adequate housing land fairly spread across the Council area, supports the inclusion of additional lands for housing in Lower Ballinderry

The comments made in the housing paper (attached) applies equally to the potential release of further lands in Lower Ballinderry.

The Ballinderry lands abut the settlement limit and are bounded to the north by the river, forming a defensible boundary. They are also in close proximity to the local school and within easy walk to other services in the village

We trust you can include these lands as a supplementary site and have regard to these when considering our main submission on this issue

If you have any queries please do not hesitate to contact me

Regards

Dear Sir/Madam

Preferred Options Paper Lisburn and Castlereagh Council

On behalf of my client Bill Porter, please find our response to the Preferred Options Paper in relation to housing needs and housing land allocation in Lisburn and Castlereagh including evidence of Mr Porter's land in Hillsborough, Carryduff, Drumbeg, Ravernet and Ballyskeagh.

In addition to our response, we provide copies on maps of the five sites in question, a working paper on housing matters and a concept plan for a retirement village in Drumbeg

Please kindly acknowledge receipt

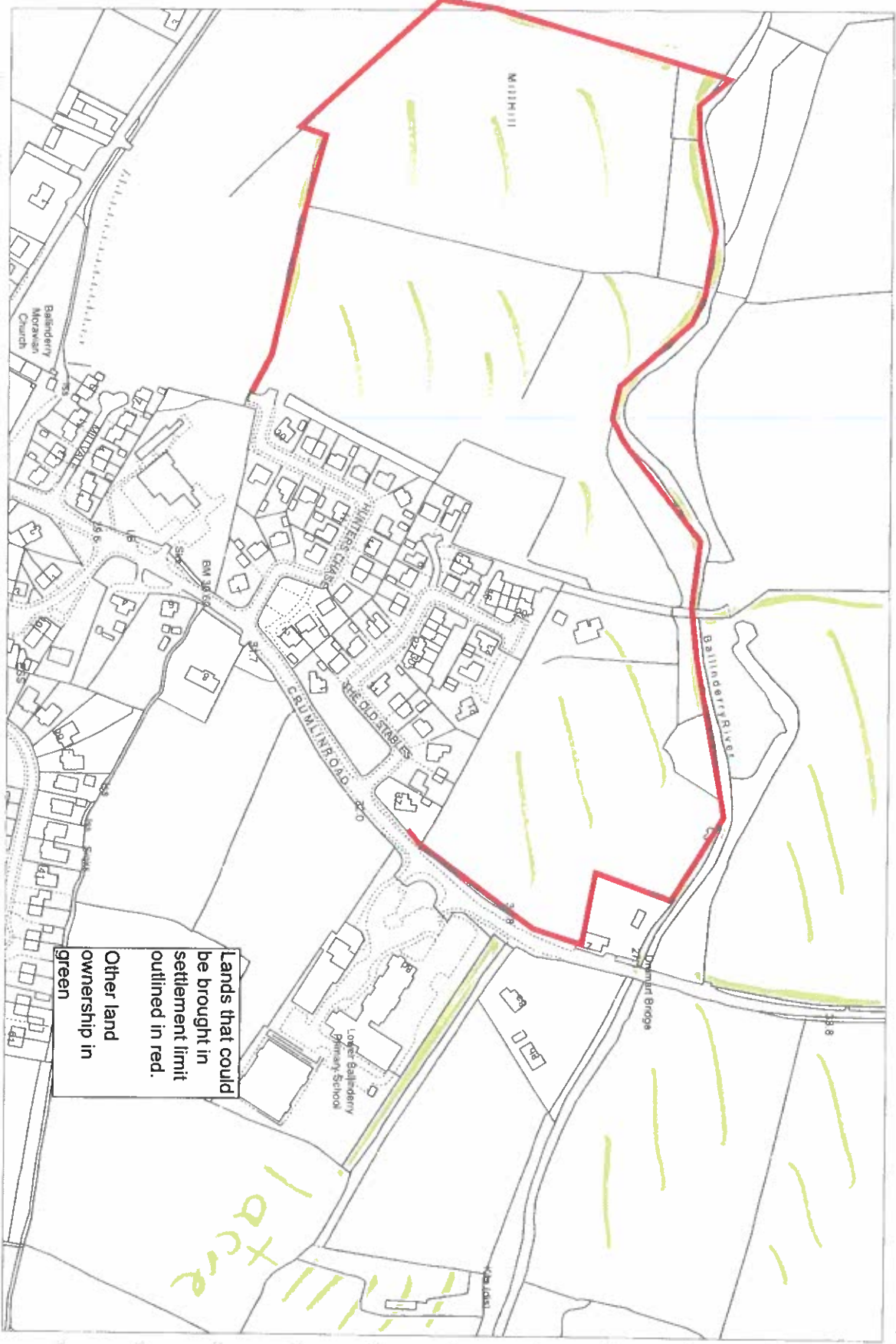
Regards

16,11 (8) LCCC
Respo...er).pdf

Annex B
Housin...ion.pdf

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Lands that could be brought in settlement limit outlined in red.
 Other land ownership in green

1 acre

367661

312553

313393

368221



Dear Sir/Madam

Preferred Options Paper Lisburn and Castlereagh Council

On behalf of my client Bill Porter, please find attached a Plan of lands (outlined in red) located in east Lisburn at McKinstry Road that would be suitable for an extension of Lisburn settlement boundary

Lisburn now benefits from the recent construction of the Lisburn North Feeder Road, making the area in west Lisburn increasingly attractive for additional family homes.

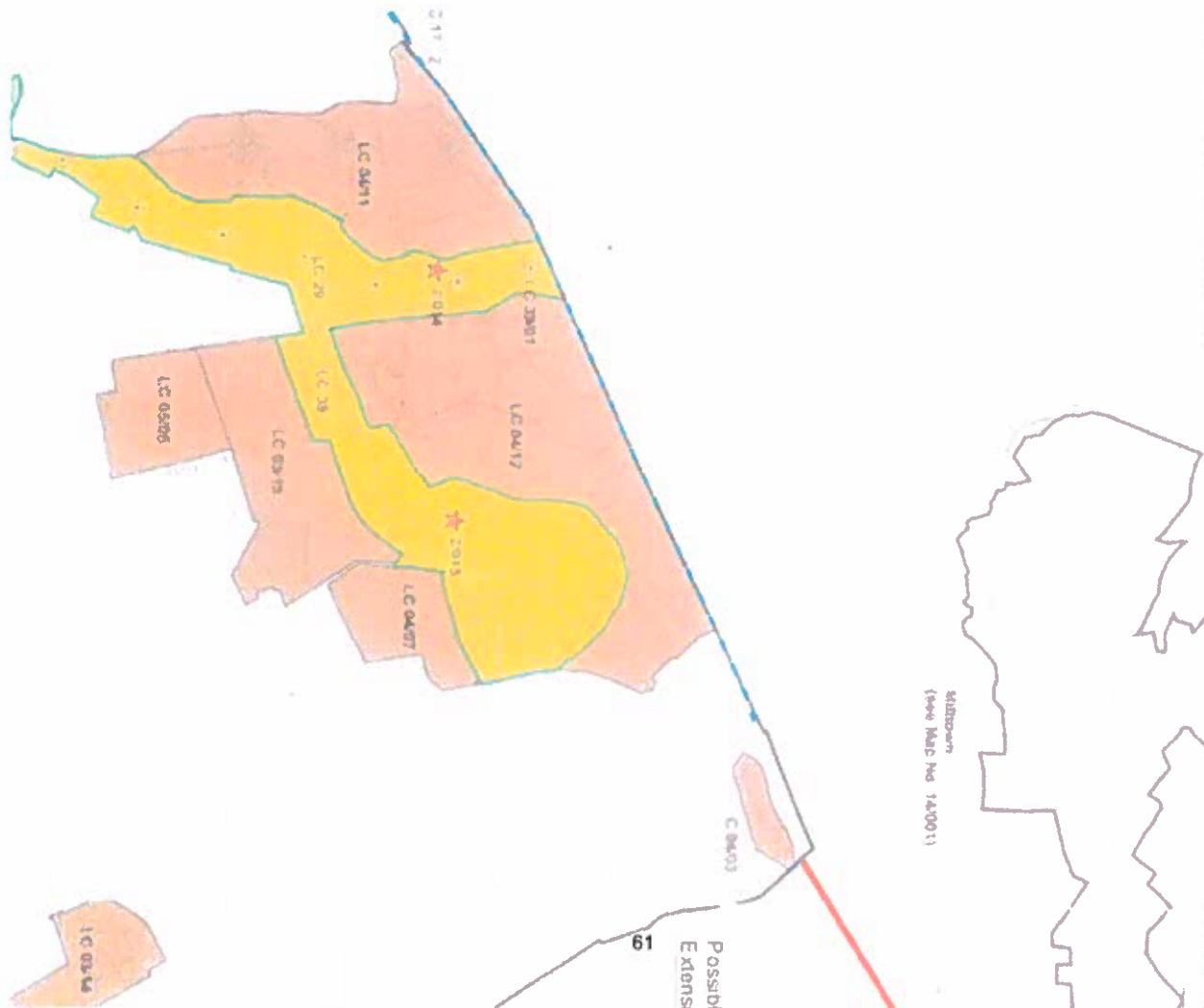
This site will bring the edge of the Lisburn City settlement limit to McKinstry Road, a defensible boundary.

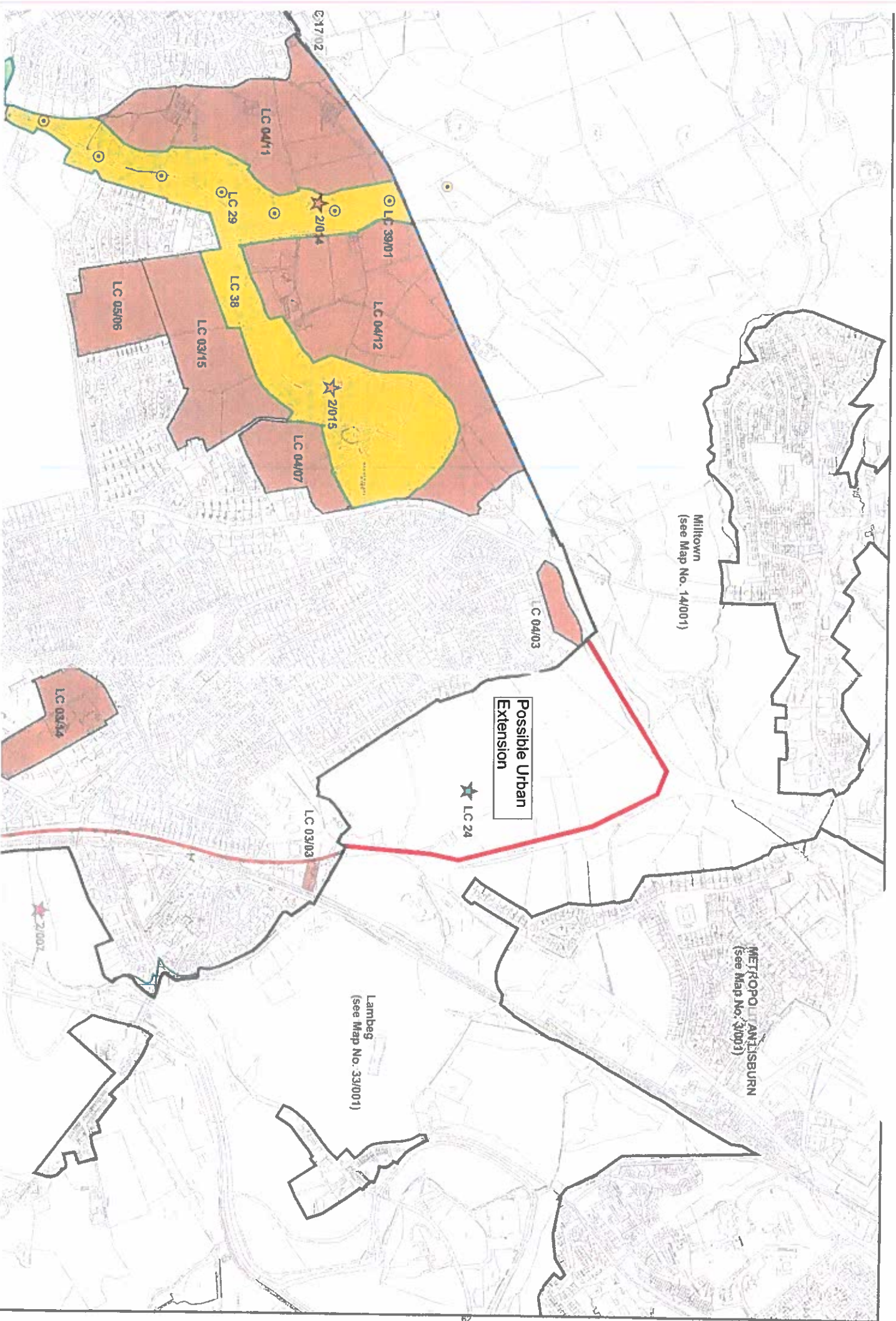
The site has an attractive setting making it ideal for a mixture of modern family homes.

We would be grateful if the Council would give consideration to the inclusion of these lands in the future review of the Lisburn Settlement Boundary in this area

Please kindly acknowledge receipt

Regards





Possible Urban Extension

★ LC 24

Milkton
(see Map No. 14/001)

METROPOLITAN/ISBURN
(see Map No. 3/003)

Lambeg
(see Map No. 33/001)

★ 21007

★ 21012

LC 04/11

LC 29

LC 39/01

★ 21014

LC 03/06

LC 38

LC 04/12

★ 21015

LC 03/15

LC 04/07

LC 04/03

LC 03/04

LC 03/03