

BY EMAIL AND POST10th January 2020

Our Ref: C03857

LISBURN & CASTLEREAGH CITY COUNCIL
 Local Planning Office
 Lagan Valley Island
 Island Civic Centre
 The Island
 Lisburn
 BT27 4RL



Dear Sir/Madam,

Re: Lisburn and Castlereagh City Council Local Development Plan – Response to the Draft Plan Strategy relating to lands at Saintfield Road, Lisburn

This letter is submitted on behalf of our client Hilmark Homes and relates to the publication of the Lisburn and Castlereagh City Council draft Plan Strategy, which was launched by the Council on Friday 11th October 2019. It highlights how some draft policies are not sound and proposes how such policies could be amended to become sound. In addition to this we draw your attention to specific lands that we have identified as being suitable for inclusion within the settlement development limits of Lisburn.

Development Plan Practice Note 6 sets out 3 main tests of soundness for Local Development Plans, with each test having a number of criteria, as follows:

Procedural Tests

- P1 *Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?*
- P2 *Has the council prepared its Preferred Options Paper and taken into account any representations made?*
- P3 *Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?*
- P4 *Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?*

Consistency Tests

- C1 *Did the council take account of the Regional Development Strategy?*
- C2 *Did the council take account of its Community Plan?*
- C3 *Did the council take account of policy and guidance issued by the Department?*
- C4 *Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?*

Coherence and Effectiveness Tests

- CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;*
- CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;*
- CE3 There are clear mechanisms for implementation and monitoring; and*
- CE4 It is reasonably flexible to enable it to deal with changing circumstances.*

Lisburn and Castlereagh City Council Local Development Plan - Part 1 Plan Strategy

Lisburn and Castlereagh City Council Vision

The LDP Vision

The Local Development Plan (LDP) will respond to the needs of the community in providing a sustainable economy, society and environment. It will support a thriving, vibrant and connected place in which people live, work, visit and invest; and an attractive, green and quality place which will enhance the wellbeing and quality of life for all.

We support this vision as it reflects the Council aspirations for the area to have a sustainable economy, society and environment that meets the needs of the community over the plan period. This is an important part of fostering healthy sustainable communities and delivering successful thriving, vibrant and connected places. It also sets out that wellbeing and quality of life is also important, making the Council area a better place in which to live, work, visit and invest over the plan period.

Strategic Objectives

Six plan objectives have been developed to deliver the vision for the Local Development Plan. The six objectives set out the aims of the LDP and what it seeks to achieve over the 15-year plan period. These include an appropriate balance between improving quality of life, economic prosperity for all, the protection of the Council's environmental assets, and to ensure that development is sustainable in the interests of future generations.

The plan objectives aim to link directly and are implemented through the strategic policies and spatial strategy detailed in Chapter 4 and operational policies contained in Part 2 of the Plan Strategy.

These objectives are:

- A: A Quality Place
- B: A Thriving Place
- C: A Vibrant Place
- D: An Attractive Place
- E: A Green Place
- F: A Connected Place

We are **generally supportive** of these objectives in principle. Further discussion on the relevant strategic policies are discussed in detail below.

Spatial Strategy

We are **generally supportive** of the Spatial Strategy below, specifically the criterion to support the growth and regeneration of our city, towns and villages, sustaining a living and working countryside and protecting environmentally sensitive areas. However, the role of Lisburn as the area of focus for development providing opportunities for a mix of uses including housing and employment.

- *support the growth and regeneration of our city, towns and villages, sustaining a living and working countryside and protecting environmentally sensitive areas*
- *provide a settlement hierarchy, defining development limits and allocating land for housing growth in accordance with the sequential approach of the RDS*
- *encourage good design and positive place-making creating places in which people want to live, work, visit and explore*
- *allocate employment land to provide an adequate and continuous supply, taking account of accessibility to major transport routes and proximity to sustainable locations near large centres of population*
- *identify, define and designate land for retailing, recreation, education or community facilities where appropriate*
- *identify, protect and enhance our historic and natural heritage environment, promote green and blue infrastructure and ecological networks*
- *accommodate sustainable development in the countryside in accordance with prevailing regional planning policy*
- *provide key site requirements where required to achieve good quality development that is reflective of the context within which it is set*
- *promote, influence and deliver a shift to more sustainable travel modes and integrated land use proposals in accordance with the regional transportation policy, promoting reduced reliance on the private car.*

Strategic Policy 01 'Sustainable Development'

Strategic Policy 01 Sustainable Development

The Plan will support development proposals which further sustainable development including facilitating sustainable housing growth; promoting balanced economic growth; protecting and enhancing the historic and natural environment; mitigating and adapting to climate change and supporting sustainable infrastructure.

We **support** Strategic Policy 01 as sustainable development is imperative. The Council should seek to support the provision of jobs, services, and economic growth; and delivery of homes to meet the full range of housing needs integrated with sustainable infrastructure, whilst recognising the balance to be achieved in protecting environmental assets.

Strategic Policy 07 'Section 76 Planning Agreements'

Strategic Policy 07 Section 76 Planning Agreements

Development will be required to deliver more sustainable communities by providing, or making contributions to, local and regional infrastructure in proportion to its scale, impact of the development and the sustainability of its location.

A developer will be expected to provide or contribute to the following infrastructure in order to mitigate any negative consequences of development:

- a) improvements to the transport network, including walking and cycling routes, public transport or, where necessary appropriate parking provision
- b) affordable housing
- c) educational facilities and/or their upgrades
- d) outdoor recreation
- e) protection, enhancement and management of the natural and historic environment
- f) community facilities and/or their upgrades
- g) improvements to the public realm
- h) service and utilities infrastructure
- i) recycling and waste facilities.

It is acknowledged that planning agreements under Section 76 of the Planning Act can be used to address issues to the granting of planning permission where these cannot be addressed using appropriate planning conditions.

Whilst this is a strategic policy, we believe it is too broad and does not set out robust evidence or methods for how the planning agreements will be used. Furthermore, appropriate guidance should be published on when a planning obligation should be used setting out the appropriate tests.

It is important that planning obligations meet the appropriate tests to be used in that it is necessary to make the development acceptable in planning terms, directly related to the development; and fairly and reasonably related in scale and kind to the development.

We **disagree** specifically to the inclusion of affordable housing within the policy, we consider that Section 76 agreements are unduly onerous and time consuming to put in place and therefore increases the timelines involved in the delivery of affordable housing. A planning condition is a more appropriate and efficient means of securing the delivery of affordable housing on sites.

Planning agreements should also be balanced against delivery of development and development viability. Where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled.

Soundness Test

- Strategic Policy 7 (SP7) is not sound as it is not reasonably flexible to enable it to deal with changing circumstances and it is not based on a robust evidence base (Test CE2).

Remedy

- Revise SP7 to remove affordable housing and include policy tests for when planning obligations should be used. Supplementary Planning Guidance should also be published so that financial contributions can be suitably quantified if necessary.

Strategic Policy O8 Housing in Settlements

The Plan will support development proposals that:

- a) are in accordance with the Strategic Housing Allocation provided in Table 3
- b) facilitate new residential development which respects the surrounding context and promotes high quality design within settlements
- c) promote balanced local communities with a mixture of house types of different size and tenure including affordable and specialised housing
- d) encourage compact urban forms and appropriate densities while protecting the quality of the urban environment.

Strategic Policy O8 sets out to ensure that housing in settlements can provide sufficient capacity for accommodating future housing growth. Whilst we support criteria b, c and d above. We **disagree** with the proposed Strategic Housing Allocation figures set out within table 3.

The Council consider that in terms of housing land supply, when measured against the updated HGI figure of 10,500 and set against the latest available evidence (as of 31 March 2017) there appears to be a healthy supply of housing across the Council area which would cover the Plan period 2017-2032.

In regard to table 3 below, the Council consider that there is an identified future need for **10,500 dwelling units** across the Council area. Currently, when taking account of existing commitments and allowing for strategic housing growth to support the economic proposals at West Lisburn, the Council believe there is a future potential of **11,578** dwelling units which closely reflects the overall strategic housing allocation (SHA) of **11,550** dwelling units. The Council suggest that allocation plus potential units from 'Urban Capacity Sites' and 'Windfall Potential' amounts to 13,782 potential units within the Council Area.

It is noted that this level of supply is dependent on the West Lisburn/Blaris strategic site coming forward to ensure deliverability in the longer term. Given the direction of regional policy and guidance

to focus housing within existing urban areas, it is acknowledged that it will be important as the LDP moves forward to Local Policies Plan, to consider the future deliverability on all housing sites across the Plan period.

Table 3 Strategic Housing Allocation over Plan Period

Settlement	Potential Units Remaining	Potential Units on Urban Capacity Sites	Windfall Potential 1-4 Units Projected over 12 year period	Windfall Potential 5+ Units Projected over 12 year period	Total Potential
Lisburn City	4,079 (38.8%)	607 (5.8%)	97 (1%)	420 (4%)	5,203 (49.6%)
Lisburn Greater Urban Area	188 (1.8%)	0	2 (0.01%)	216 (2%)	406 (3.8%)
Castlereagh Greater Urban Area	1,628 (15.5%)	103 (1%)	43 (0.4%)	248 (2.4%)	2,022 (19.3%)
Carryduff	1,407 (13.4%)	119 (1.1%)	10 (0.09%)	76 (0.8%)	1,612 (15.4%)
Hillsborough & Culcavy	421 (4%)	25 (0.2%)	22 (0.2%)	44 (0.4%)	512 (4.9%)
Moirs	545 (5.2%)	21 (0.2%)	0	151 (1.4%)	717 (6.8%)
Urban Settlement Total	8,268 (78.7%)				10,472 (99.8%)
Villages & Small Settlements	1,231 (11.7%)				1,231 (11.7%)
Countryside	729 (6.9%)				729 (6.9%)
Total Units	10,228 (97.4%)	875 (8.3%)	174 (1.7%)	1,155 (11%)	12,432 (118.4%)
Strategic Mixed Use site West Lisburn/Blaris	1,350 (12.9%)				1,350 (12.2%)
Total no of units	11,578	12,453	12,627	13,782	13,782
Total % of HGI	110.3%	118.6%	120.3%	131.3%	131.3%

Figures in brackets taken as percentage of 10,500 HGI figure taken from Housing Growth Study
 Villages and small settlements based on Housing Policy Areas and committed sites with planning permission
 Countryside based on building control completion notices over 5 years at an average of 54 Dwellings per year projected (excludes replacement dwellings)
 All figures have been reduced by 10% to take account of the potential non deliverability during plan period.

The Strategic Housing Provision sets out that there are **4,079** 'potential units remaining' in Lisburn City, with an additional 607 potential units on 'Urban Capacity Sites' and 517 potential windfall units, which results in a total potential of **5,203** units within the City. There is also said to be **188** 'potential units remaining' in the Lisburn Greater Urban Area, with an additional 218 potential units on windfall sites, which results in a total potential of **406** units within the Greater Urban Area.

It is our opinion that the Councils approach to housing growth projections is based on too short a review period. A suggested alternative approach that is considered more appropriate is to base the overall housing growth figure on a longer period of growth, from 1998 to 2013, which includes both pre and post-recession build out rates and provides a clearer indication of the probable growth over a 14.5 year period. A total number of 11,540 dwellings were built over a 14.5-year period from December 1998 to July 2013, with an average annual build out rate to be 796 dwellings per year.

Using this data to calculate the predicted growth over the plan period plus a five-year supply, results in a housing growth figure of 15,920 units. In addition to this, a further 1,592 units (10%) to accommodate further anticipated growth should be added, to ensure that any shortfall in housing land does not occur over the plan period. It is acknowledged within the draft Plan Strategy that the Council forms part of the wider Belfast Metropolitan Area, and therefore cognisance must be given to housing growth in this market area, and how it could impact on the Council Area.

We feel that adding a further 10% is necessary due to the ambitious economic growth plans of the neighbouring council areas of Belfast and Antrim & Newtownabbey. Belfast in particular seeks to

create a further 46,000 jobs over the period of 2020-2035, and whilst this predicted economic growth will see an increase in population within the Belfast City Council area, it is inevitable that this will have a knock-on effect, in terms of housing demand, on neighbouring Councils areas that also contribute commuters to Belfast, such as Lisburn and Castlereagh.

In addition to this, Lisburn and Castlereagh Council Area shares boundaries with other Councils, such as Ards and North Down, Armagh, Banbridge and Craigavon and Newry, Mourne and Down. Therefore, there will ultimately be a host of inter-relationships between these Council Areas, with people travelling across boundaries for work, for leisure etc. As such, Lisburn and Castlereagh housing growth projections should take cognisance of the plans of all of these neighbouring Councils.

Such an approach is necessary and in line with statutory requirements under section 3(4) and 3 (5) of the Planning Act 2011, which requires Councils to consider how the plans of neighbouring districts may affect the Councils, own plans.

A further 2,400 units should also be added to the housing growth figures, in line with Lisburn and Castlereagh Councils ambitious plans to develop 80ha of land at Blaris for residential development, which would yield approximately 2,400 units, not 1,350 as identified within the allocation table. Whilst it is acknowledged that the currently pending application (ref. LA05/2018/1154/O) for these lands proposes 1,300 residential units; the West Lisburn Development Framework Document proposes 2,400 dwellings for Blaris. Should the Council now be minded to reduce potential capacity at Blaris to 1,350, the remaining 1,050 dwellings originally envisaged for Blaris should be reallocated to elsewhere in Lisburn city.

A further 2,400 social units will need to be added to the figure, that are predicted to be required within the Council area throughout the plan period. The Council suggest that the delivery of affordable housing (6,240 total requirement) and in particular social housing (2,400 requirement) will largely depend on the zoned sites remaining to be developed and other sites lying outside these zonings (urban capacity and windfall). Such an approach will not necessarily deliver the required affordable/social housing. We have undertaken a review of remaining available development land in Lisburn (see section on 'Housing Land Availability in Lisburn' in this submission) and it is clear that the Council have under-estimated the availability/appropriateness of such lands to deliver required housing units. Furthermore, no reliance can be placed on windfall sites, given the uncertainty of availability of such sites, coming forward during the plan period for social housing development.

The draft Plan Strategy housing allocation column is based on the Councils identified 'Total Potential' within Table 3 'Strategic Housing Allocation over Plan Period' on page 64 of the draft Plan Strategy. However, we consider that this is not a true reflection of the total potential within the Council Area as Urban Capacity Sites and Windfall figures should be discounted given their speculative nature and as a result, they cannot be relied upon for housing delivery. It is noted that windfall potential is a key element of the Urban Capacity Study therefore an element of double counting may have also taken place.

The table below sets out the draft Plan Strategy Allocation, the corrected potential remaining units (removing speculative urban capacity sites and windfall potential) and our suggested housing allocation which the Council should take account of.

Tier	Settlement	Draft Plan Strategy Housing Allocation	Corrected Potential Remaining Units	Suggested Housing Allocation
City	Lisburn	5,203 (49.6%)	4,079	5,974 - 30%
Lisburn Greater Urban Area	Lisburn Greater Urban Area	406 (3.8%)	188	796 - 4%
Castlereagh Greater Urban Area	Castlereagh Greater Urban Area	2,022 (19.3%)	1628	4,182 - 21%
Towns	Carryduff	1,612 (15.4%)	1407	3,982 - 20%
	Hillsborough & Culcavy	512 (4.9%)	421	996 - 5%
	Moira	717 (6.8%)	545	996 - 5%
Villages and Small Settlements		1,231 (11.7%)	1,231	Villages: 2,389 - 12% Small Settlements: 597- 3%
Countryside		729 (6.9%)	729	0%
Total		12,432	10,228	19,912
Strategic Mixed-Use site West Lisburn/Blaris		1,350 (12.9%)	2,400	2,400
	Overall Total	13,782	12,628	22,312

Taking all the above into consideration, we believe the overall suggested Housing Growth figure for the Council area over the new plan period should be **22,312 dwellings**, broken down as follows:

- **Revised HGI figure of 15,920 (based on 1998-2013 build out rates); +**
- **1,592 (a 10% uplift to ensure no shortfall in supply and account for neighbouring Council's growth plans); +**
- **2,400 units as proposed for the Blaris lands in the West Lisburn Development Framework Plan; +**
- **2,400 social housing need over the plan period, as set out in the dPS.**

This housing allocation, while higher than the HGI figure, will provide greater flexibility in the plan as opposed to the Councils housing allocation, of basing their figures on the Housing Growth Indicators for Northern Ireland which are purely "indicators" and only provide an estimate of the new dwelling requirement for the Region.

Based on our suggested growth allocation above, which apportions 30% of the overall housing allocation figure to Lisburn, **5,974** new dwellings will be required within Lisburn and 796 within the Greater Urban Area within the next plan period.

Soundness Test

- Strategic Policy 08 (SP08) is not sound as it is not reasonably flexible to enable it to deal with changing circumstances i.e. unexpected growth (Test CE4) and it is not based on a robust evidence base (Test CE2). The projected housing growth underestimates the housing need for the district over the plan period, as detailed above.

Remedy

- Revise SP08 to update the housing growth figure to provide **22,312** new homes within the district by 2032.

Appendix D Evaluation of Settlement Characteristics

Lisburn is classified as a level 4 Principal City in the RDS hierarchy of settlements as it has a high level of services and facilities to cater for the larger population including a hospital, police station, a wide variety of chain and independent shops, a leisure complex with cinema and variety of restaurants and concert venue at the Island Complex and community facilities with a number of churches and associated halls. Lisburn City also has good infrastructure with provision of road and rail services and within close proximity to the airport.

The Lisburn New Holland Waste Water Treatment Works has remaining capacity. Part of Lisburn City is also served by Dunmurry Waste Water Treatment Works with remaining capacity. This confirms that additional housing development can be accommodated in this location and should be supported within the Local Policies Plan in identifying more lands for housing within the new settlement limit.

We agree with the future potential set out within the Appendix states that the Plan should focus major population and economic growth on Lisburn City thus maximising benefits from efficient use of existing facilities, infrastructure and its strategic location on the transport corridors.

The appendix states that there is a good supply of housing & employment Land remaining as identified in the Monitoring Reports. Although we consider further housing lands are required to accommodate future growth within the next plan period and request that lands that are readily available for housing development be considered for housing in order to aid housing delivery within the settlement.

Furthermore, it states Lisburn & Castlereagh Greater Urban Areas act as main service centres. It is therefore intended to focus major population and economic growth on maximising benefits from efficient use of existing facilities, infrastructure and their strategic location on the transport corridors. In terms of expansion, Lisburn Greater Urban Area has limited scope for new development. We disagree with this comment and believe the Lisburn Greater Area is a prime location for expansion given its close proximity to a high range of services and transport links.

Furthermore, it appears that the Council's main focus for future housing growth in Lisburn will be concentrated around the Blaris lands. However, we would urge the Council to consider a more equitable allocation of zoned residential lands in Lisburn City. Areas that currently lack any zoned lands for further residential development, such as south Lisburn, should be considered for new zonings to ensure a balanced growth throughout the city.

In addition, the potential for significant growth elsewhere in the city is restricted by other zonings or physical features. For example, further growth east is restricted by the Lagan Valley Regional Park and further growth north-east would result in coalescence with Metropolitan Lisburn/West Belfast. Significant growth west, beyond the Blaris lands, would be restricted by floodplains and other environmental designations. On this basis, further growth of Lisburn city should be concentrated to more suitable areas, such as south Lisburn.

Strategic Policy 20 'Transportation Infrastructure'

Strategic Policy 20 Transportation Infrastructure

The Plan will support development proposals that:

- a) provide or improve an integrated transport network servicing the needs of our community and future growth
- b) deliver sustainable patterns of development, including safe and accessible environments
- c) encourage a modal shift from private car dependency through integration of transport and land use
- d) facilitate Park & Ride, active travel (public transport, cycling and walking) and strategic greenways to move to towards more sustainable modes of travel both within the Council area and linking to wider regional networks.

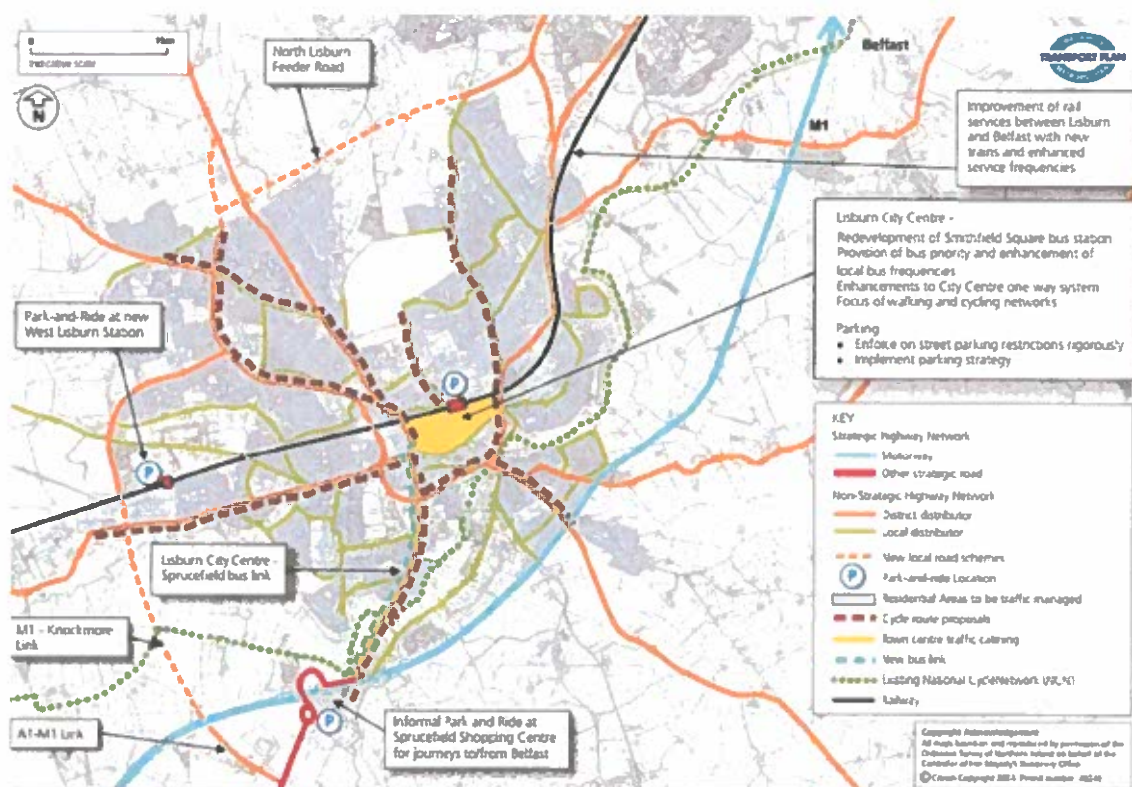
The seven objectives to support the Plan Strategy are as follows.

- Objective 1: Enhance regional accessibility by road and public transport from the centres of Lisburn City, Castlereagh Greater Urban Area, Moira, Hillsborough & Culcavy and Carryduff to Belfast, Derry/Londonderry, gateways and hubs.
- Objective 2: Ensure viable local public transport accessibility to essential services for people living in the Lisburn & Castlereagh Council area.
- Objective 3: Ensure there are attractive and safe active travel networks (walking and cycling) linking all existing and new residential, employment, retail and leisure developments in the urban areas of Lisburn City, Castlereagh Greater Urban Area, Moira, Hillsborough & Culcavy and Carryduff.
- Objective 4: Deliver high-quality public realm in the centres of Lisburn City, Castlereagh Greater Urban Area, Moira, Hillsborough & Culcavy and Carryduff, with reduced vehicle dominance, to make the towns attractive places to live and work and to improve safety for active modes.
- Objective 5: Enhance accessibility by sustainable modes of transport to the centres of Lisburn City, Castlereagh Greater Urban Area, Moira, Hillsborough & Culcavy and Carryduff to safeguard their viability.
- Objective 6: Enhance safety for all modes of transport and reduce the number and severity of casualties.
- Objective 7: Ensure our transport systems are resilient to climate change and well-maintained.

We are generally supportive of the above strategic policy, specifically criterion (a) in the need to provide or improve an integrated transport network servicing the needs of the community and future growth. This is in line with objective 1 of the Local Transport Study which seeks to enhance regional accessibility by road and public transport from the centres of Lisburn City, Castlereagh Greater Urban Area, Moira, Hillsborough and Culcavy and Carryduff to Belfast, Derry/Londonderry, gateways and hubs.

However, we would encourage the Council to include the Lisburn Southern Relief Road within the draft Plan Strategy as part of the identified Strategic Infrastructure, as the draft Plan Strategy fails to identify the link road and its potential benefits at this stage.

At the dBMAP Public Inquiry (see appendix 2 for PAC report extract), Lisburn City Council wished to see an orbital road provided in conjunction with residential development on any additional sites. The PAC also agreed that the road link was required at this location and conceded that the proposed road from Hillhall Road to Saintfield Road is a valuable idea.



The above plan is taken from the Belfast Metropolitan Area Transport Plan and illustrates the strategic road network in and around Lisburn. The traffic movements in and through Lisburn are driven by the main approach routes to the City; namely from the M1 to the south (accessed via the Saintfield Road roundabout and the Sprucefield junction) and from Belfast to the north from the North Lisburn Feeder Road (A513).

The recently completed Northern Lisburn Feeder Road has improved access to the northern section of the town. The proposed Knockmore Link Road will provide a further link between the Northern Lisburn Feeder Road to the M1. This will effectively result in a north and west circular 'orbital' feeder road that runs from the M1 to Derriaghly.

In comparison, there has been a lack of investment in the southern access roads. The M1 motorway junctions at Saintfield Road and Hillsborough Road both reach capacity during the morning and evening peak periods and significant queuing occurs along the southern approaches to Lisburn City. This congestion has spread to Hillhall Road, a secondary access route that links Lisburn and Castlereagh. An alternative route into the city from southern approaches is the only means of alleviating current congestion issues.

On the above basis, the Lisburn Southern Relief Road should be included as a key Strategic Infrastructure proposal in the Local Development Plan, given that the completion of the Lisburn Southern Relief Road would open the potential to have a complete strategic orbital relief road around Lisburn as seen on the mapping below, specifically:

- i. The Northern Feeder Road to Knockmore Road to Knockmore Link Road to M1 (Purple);
- ii. Hillhall Road to Ballynahinch Road to M1/A1 (Pink/Blue)



Lisburn and Castlereagh City Council Local Development Plan - Part 2 Operational Policies

Policy HOU1 'New Residential Development'

HOU1 New Residential Development

Planning permission will be granted for new residential development in settlements in the following circumstances:

- a) on land zoned for residential use
- b) on previously developed land (brownfield sites)
- c) in designated city, town centres, villages and small settlements
- d) living over the shop schemes within designated city and town centres, or as part of mixed use development.

The above policy applies to all residential uses as set out in Part C of the Schedule to the Planning (Use Classes) Order (Northern Ireland) 2015 (or as amended).

We are **generally supportive** of Policy HOU1, although consider that criterion (c) should also include Greater Urban Areas as locations for new residential development, as the policy as written is currently too restrictive limiting the location of housing developments. Housing growth should be promoted within the totality of the Greater Urban Area in order to maintain growth and aid housing delivery.

Policy HOU3 'Site Context and Characteristics of New Residential Development'

HOU3 Site Context and Characteristics of New Residential Development

Planning permission will be granted for new residential development where it will create a quality and sustainable residential environment which respects the existing site context and characteristics. An overall design concept, in accordance with Policy HOU6 must be submitted for all residential proposals and must demonstrate that a proposal draws upon the positive aspects of, and respects the local character, appearance and environmental quality of the surrounding area.

Proposals for residential development will be expected to conform to all the following criteria:

- a) the development respects the surrounding context, by creating or enhancing a local identity and distinctiveness that reinforces a sense of place, and is appropriate to the character and topography of the site in terms of layout, scale, proportions, massing and appearance of buildings, structures and landscaped and hard surfaced areas
- b) archaeological, historic environment and landscape characteristics/features are identified and, where appropriate, protected and suitably integrated into the overall design and layout of the development.

For new residential development in areas of distinctive townscape character, including Conservation Areas and Areas of Townscape or Village Character, an increased residential density will only be allowed in exceptional circumstances and space standards should be in accordance with published Departmental guidance.¹

We **support** Policy HOU3, as it is important to provide attractive and sustainable residential development with a high quality of design, layout and landscaping. We agree that each proposal for residential development should be based on a clear design concept.

Policy HOU4 'Design in New Residential Development'

HOU4 Design in New Residential Development

Proposals for residential development will be expected to conform to all the following design criteria:

- a) the design of the development must draw upon the best local architectural form, materials and detailing
- b) landscaped areas using appropriate locally characteristic or indigenous species and private open space must form an integral part of a proposal's open space and where appropriate will be required along site boundaries to soften the visual impact of the development and assist in its integration with the surrounding area

- c) where identified as a Key Site Requirement adequate provision is made for necessary local community facilities, to be provided by the developer
- d) residential development should be brought forward in line with the following density bands:
 - City Centre Boundary 120-160 dwellings per hectare
 - Town centres and greater urban areas 25-35 dwellings per hectare
 - Villages and small settlements 20-25 dwellings per hectare.
- e) a range of dwellings should be proposed that are accessible and adaptable in their design to provide an appropriate standard of access for all. The design of dwellings should ensure they are capable of adaption to provide accommodation that is wheelchair useable for those in society who are mobility impaired. A range of dwelling types and designs should be provided to prevent members of society from becoming socially excluded
- f) dwellings should be designed to be energy and resource efficient and, where practical should include integrated renewable energy technologies to minimise their impact on the environment

- g) a proposed site layout must indicate safe and convenient access through provision of walking and cycling infrastructure, both within the development and linking to existing or planned networks; meet the needs of mobility impaired persons; and respect existing public rights of way
- h) adequate and appropriate provision is made for car and bicycle parking including where possible electric vehicle charging points
- i) the design and layout must not create conflict with adjacent land uses and there is no unacceptable adverse effect on existing or proposed properties in terms of overlooking, loss of light, overshadowing, noise or other disturbance
- j) the design and layout should where possible include use of permeable paving and sustainable drainage

- k) the design and layout design must demonstrate appropriate provision is made for householder waste storage and its collection can be facilitated without impairment to the access and manoeuvrability of waste service vehicles
- l) the development is designed to deter crime and promote personal safety.

Any proposal for residential development which fails to produce an appropriate quality of design will not be permitted, even on land identified for residential use in a development plan.

We are generally supportive of Policy HOU3, with the exception of criterion (d) and (e).

In regard to criterion (d), prescriptive density bands should not be set within policy given that density should take into account specific local context, design, residential quality and transport links. These are all important considerations in determining whether the proposed density is acceptable.

The above density bands could potentially be used as a guide within supplementary planning guidance but should not be used within policy as they can limit the development potential of proposals within the relevant settlement areas.

Where the high density does not manifest itself in any unacceptable impacts in terms of design, residential quality, views, Conservation Areas/Areas of Townscape Character/Areas of Village Character or transport impacts, the proposed density should be considered acceptable.

In regard to criterion (e), it is considered that design standards should be incorporated to provide for 'Lifetime Homes' which meet the varying needs of occupiers and are easily capable of accommodating adaptations. Developers should ensure that a range of dwelling sizes (including internal layout and the number of bedrooms) is provided to meet a range of housing needs that facilitate integration and the development of mixed communities.

Whilst some of the Lifetime Homes standards are included in technical booklet Part R of the Building Regulations (Northern Ireland) 2012, many are not. This policy seeks to address those elements of the standards that can be adequately addressed through the planning system. The policy will apply more to new dwellings provided through the private sector as the requirement for Housing Associations to

build to the Lifetime Home standards has applied in NI since 1998 and is set out in the DfC Housing Association Guide (HAG).

Although, we support the Lifetime Homes approach, we do not think it should be a planning requirement. In England for example, the Lifetime Homes Standard was once a planning requirement, however, it has since been abolished and built into updated Building Regulations (Requirement M4(2) and/or M4(3)). We believe the same approach should be taken here within Northern Ireland. Lifetime Homes would also create yet another design challenge at planning application stage which may not be achievable on all sites, specifically those which are constrained in terms of size.

Soundness Test

- Policy HOU4 is not sound as it is not based on a robust evidence base (Test CE2) and at planning stage mechanisms for monitoring of building to the lifetime homes standard is not clear (Test CE3)

Remedy

- Revise HOU4 to remove reference to density bands and also remove lifetime homes as a planning requirement and ensure it is brought forward under the authority of Building Regulations.

Policy HOU10 'Affordable Housing in Settlements'

HOU10 Affordable Housing in Settlements

Where the need for Affordable Housing is identified, through the Housing Needs Assessment¹¹, on sites of more than 0.5 hectares or comprising of 5 residential units or more, proposals will only be permitted where provision is made for a minimum 20% of all units to be affordable. This provision will be secured and agreed through a Section 76 Planning Agreement.

All developments incorporating affordable housing should be designed to integrate with the overall scheme with no significant distinguishable design differences, in accordance with any other relevant policies contained within this Plan Strategy.

In exceptional circumstances where it is demonstrated that the affordable housing requirement cannot be met, alternative provision must be made by the applicant, or an appropriate financial contribution in lieu must be agreed through a Section 76 Planning Agreement. Such agreements must contribute to the objective of creating mixed and balanced communities.

Proposals for the provision of specialist accommodation for a group of people with specific needs (such as purpose built accommodation for the elderly, Policy HOU11) will not be subject to the requirements of this policy.

Windfall sites will be encouraged for the development of affordable housing in suitable and accessible locations.

By exception, proposals for affordable housing could be permitted on land identified as open space, in accordance with Policy OS1, where it can be demonstrated that all of the following criteria have been met:

- a) a demonstrable need has been identified by the Northern Ireland Housing Executive
- b) the application is made by a registered Housing Association
- c) the proposal will bring substantial community benefits that decisively outweigh the loss of the open space.

Development proposals will not be supported where lands have been artificially divided for the purposes of circumventing this policy requirement.

Whilst we support the delivery of affordable homes in the Council Area and welcome the similar to the approach used in the Northern Area Plan 2016 in NIHE identifying need; we disagree with the threshold set that sites of more than 0.5ha or comprising 5 residential units or more should provide 20% affordable housing. We consider that the threshold for affordable housing should be introduced once the proposals meet or exceed the 'major residential development' threshold comprising 50 residential units or more or sites of 1ha or more. Setting the provision of affordable housing threshold to major developments is also an approach which has been widely used in England.

The current thresholds are extremely low and the provision of social housing dwellings on small-scale development sites will render many unviable; resulting in a significant decline in small scale housing developments. Furthermore, the SPPS clearly indicates that affordable housing is a matter to be addressed through: "...zoning land or by indicating, through key site requirements, where a proportion of a site may be required for social/affordable housing". The zoning of land and key site requirements are all matters for the Local Policies Plan and not the Plan Strategy Document.

We also **disagree** with the above comment that section 76 planning agreements are the appropriate means to secure affordable housing provision. Section 76 agreements are unduly onerous and time consuming to put in place and therefore increases the timelines involved in the delivery of affordable housing. A planning condition is a more appropriate and efficient means of securing the delivery of affordable housing on sites.

Soundness Test

- Policy HOU10 is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) and it is not based on a robust evidence base (Test CE2).

Remedy

- Revise HOU10 so that affordable homes provision is only required on 'major residential development' that comprises 50 units or more or more sites of 1ha and/or where there is an identified level of need in agreement with NIHE.

Monitoring & Review

The Local Development Plan is intended to be a flexible document which responds to changing needs and circumstances locally. Monitoring will therefore be essential for the delivery of the local development plan and should provide the basis to trigger any requirement to amend the strategy, policies and proposals of the Plan.

Indicators and trigger points are set out in Chapter 5 of Part 1 Plan Strategy. We broadly support the monitoring indicators set out in the technical supplement, which are to be used to measure how well the plan is performing in terms of achieving its strategic objectives, including ensuring an adequate supply of housing for the district over the plan period.

However, projected housing figures and other relevant policies specified above should be amended as required in order to enable accurate monitoring of the plan.

Soundness Test

- Policies SP08, HOU1, HOU4, HOU10 are not sound under which the success of the plan is being assessed and are not based on robust evidence (Test CE2).

Remedy

- Revise as per previous recommendations.

Housing Land Availability in Lisburn

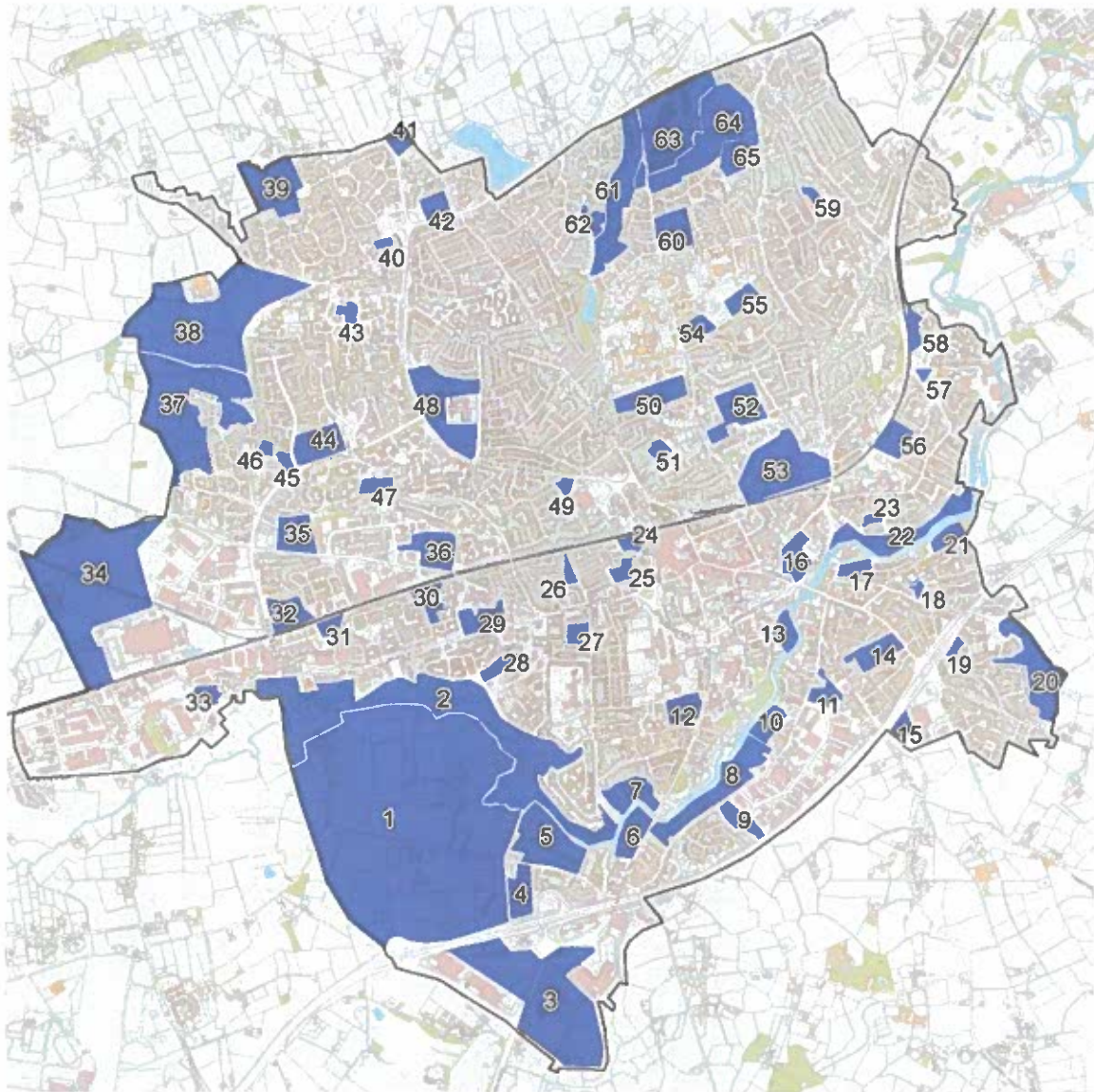
The Local Policies Plan will bring forward settlement limits for each of the settlements and allocate land, where appropriate, for new homes and employment to meet the identified needs of our Borough in a sustainable manner. It will also bring forward a range of local designations that will help steer overall growth and development.

The Strategic Housing Provision sets out that there are 4,079 'potential units remaining' in Lisburn City, with an additional 607 potential units on 'Urban Capacity Sites' and 517 potential windfall units, which results in a total potential of 5,203 units within the City. There is also said to be 188 'potential units remaining' in the Lisburn Greater Urban Area, with an additional 218 potential units on windfall sites, which results in a total potential of 406 units within the Greater Urban Area. However, on the basis of our arguments set out within Strategic Policy 08 above, which apportions 30% of the overall housing allocation figure to Lisburn and 4% to the Lisburn Greater Urban Area, 5,974 new dwellings will be required within Lisburn and 796 within the Greater Urban Area within the next plan period.

The latest Housing Monitor (Appendix 2) for the Council Area relates to 2016-2017 identifies that Lisburn City has a remaining potentially suitable lands to accommodate 218 units (6.64ha). This also represents a significant shortfall of 5,756 units to our suggested housing allocation.

Also, the Housing Monitor itself uses the term "potentially suitable" to describe the lands it identifies as part of the housing supply. The use of this term acknowledges that not all sites identified in the housing monitor may be deliverable and highlights that a 5-year supply cannot be maintained.

A review of the lands within Lisburn carried out by Gravis Planning identified that there are limited suitable available lands suitable within the current settlement limit to accommodate any future housing growth, therefore it is evident that additional lands will be required within the next plan period or indeed before. All remaining lands have been assessed for potential and are mapped out in blue on the plan below:



Site Ref	Status	Site Potential
1	Undeveloped – Blaris Lands	Lands identified as a strategic mixed-use proposal within the draft Plan Strategy. There is currently an outline application pending consideration for a proposed mixed-use development to include new housing (1300 dwellings) and commercial floor space (754,000 sq.ft.)1.6km M1-Knockmore link road, riverside parkland and ancillary works (LA05/2018/1154/O)
2	Open Space	Lands used for recreation and open space and is located within a Local Landscape Policy Area therefore unsuitable for development

3	Remaining lands at Sprucefield	Lands within Regional Centre at Sprucefield Regional Shopping Centre. The area is predominantly retail in use therefore the appropriate use in this location is retail, so unlikely to come forward for housing
4	Cemetery	Unavailable for housing development
5	Cemetery and Open Space	Site is partially a cemetery and the land to the rear is identified as recreation/open space and is therefore unavailable for housing development
6	Undeveloped	The lands remain undeveloped and have not come forward for development. There is no live planning permission on site and given its history there are likely issues with the site coming forward for housing
7	Undeveloped – with planning permission history for Hotel use	Permission granted Feb 2012 for “Proposed demolition of existing dwelling, construction of new 100 bed hotel with function rooms, health suite, free-standing interpretative centre, new road access with right hand turning pocket, car parking & site works (S/2010/0689/F) – therefore unlikely to come forward for housing
8	Undeveloped	Site is identified as a Site of Local Nature Conservation Importance, although there have been some planning applications submitted on site for small scale residential including: LA05/2019/0947/O - Site for 6 no detached dwellings (pending consideration) LA05/2019/0350/F - Proposed 8 no new dwellings with detached garages (amended plans) (pending consideration)
9	Planning Application pending consideration for warehouse/distribution	Planning application submitted and pending consideration for the Construction of new warehouse/distribution building and associated ancillary offices (LA05/2019/0057/F), the proposals would be an extension to Blaris Industrial estate and is zoned for employment and industry uses therefore unlikely to come forward for housing
10	Planning permission granted for residential development	S/2011/0342/F/ LA05/2015/0515/NMC - New build of 17 No houses and 28 No apartments together with associated access road, parking and landscaping. NMC Granted Feb 2016 LA05/2017/1255/O - Site for residential development – granted October 18

11	Lands associated with large residential dwelling	Lands associated with large residential dwelling – unavailable for redevelopment
12	Cemetery	Unavailable for redevelopment
13	Recreation and Open Space	Existing Recreation and Open Space, protected under PPS8 and unlikely to come forward for housing
14	Barbour park playing fields	Existing playing fields, protected under PPS8 and unlikely to come forward for housing
15	Undeveloped	Planning permission on the neighbouring site to the south granted in June 2016 for residential development to include one replacement dwelling plus 29 new houses (S/2015/0119/F)
16	Lands associated with Castle Garden	Existing Recreation and Open Space, protected under PPS8 and unlikely to come forward for housing
17	Canal Street Car Park	Unavailable for redevelopment
18	Open Space associated with residential development	Existing Open Space, protected under PPS8 and unlikely to come forward for housing
19	Open Space associated with residential development	Part of wider site below for residential development
20	Planning permission granted for residential development	Planning permission granted on appeal in September 2012 relating to amended layout and proposed change in house type to include 452 no dwellings (101 No detached, 132 semi-detached, 151 No townhouses and 69 No apartments), garages, car ports, retirement village managers house/office and all associated site works (S/2011/0383/F)
21	Existing Recreation and Open Space	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
22	Existing Recreation and Open Space	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
23	Existing Recreation and Open Space	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
24	Land associated with Tonagh Primary School	Land associated with primary school and therefore unavailable for housing
25	Cemetery	Unavailable for housing development

26	Existing Recreation and Open Space	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
27	Sir Milne Barbour Memorial Park Bowling Green	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
28	Existing Recreation and Open Space	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
29	Land associated with Tonagh Primary School	Land associated with primary school and is therefore unavailable for housing
30	Land associated with Grove Activity Centre	Land associated with Activity Centre and is therefore unavailable for housing
31	Undeveloped	The lands remain undeveloped and have not come forward for development. There is no live planning permission on site and given its history there are likely issues with the site coming forward for development
32	Planning Application pending consideration for new rail halt and park and ride facility	Planning application currently pending consideration (S/2014/0884/F) for a proposed new rail halt and park and ride facility (incorporating track realignment platforms footbridge ticket office staff facility on footbridge , 350no standard car parking spaces 22no disabled parking spaces, 2no electric car charging points and bus turning area) including associated ancillary works
33	Undeveloped	Existing Employment and Industry Zoned Land, therefore unlikely to come forward for housing
34	Undeveloped	Existing Employment and Industry Zoned Land, therefore unlikely to come forward for housing
35	Undeveloped – zoned housing	The lands remain undeveloped and have not come forward for development. There is no live planning permission on site and given its history there are likely issues with the site coming forward for development
36	Undeveloped – zoned housing	The lands remain undeveloped and have not come forward for development. There is no live planning permission on site and given its history there are likely issues with the site coming forward for development
37	Undeveloped – zoned housing Planning permission granted	Planning permission granted in September 2018 for a new residential development comprising 297 dwellings (S/2014/0623/RM)

38	Undeveloped – zoned housing, planning application submitted	Planning application pending consideration for 545 dwellings (LA05/2017/1124/F)
39	Undeveloped – zoned housing, planning permission granted	Planning permission granted in Feb 2009 for proposed development for 220 dwellings comprising of detached, semi-detached, terrace dwellings and apartments with garages, carports and other associated siteworks (S/2007/0934/RM)
40	Playing pitches	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
41	Undeveloped – zoned housing Planning permission granted	Planning permission granted in May 2018 (LA05/2017/0628/F) for erection of 17 units comprising of 8 no. apartments, 5 detached dwellings and 4 semi-detached dwellings including detached garages and associated carparking, landscaping and site works. Amendment to previous approvals S/2009/0475/F and LA05/2016/0511/F
42	Undeveloped – zoned housing	The lands remain undeveloped and have not come forward for development. There is no live planning permission on site, although potentially connected to the wider zoning redevelopment
43	Existing Recreation and Open Space	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
44	Queen Elizabeth II Playing fields	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
45	Lands associated with Parkview Special School	Land associated with school and is therefore unavailable for housing
46	Undeveloped	The lands remain undeveloped and have not come forward for development. There is no live planning permission on site and given its history there are likely issues with the site coming forward for development
47	Bluebell Stadium	Lands associated with stadium, protected under PPS8 and unlikely to come forward for housing
48	Lands associated with Laurelhill Community College	Land associated with community college and is therefore unavailable for housing
49	Planning permission granted for residential development	Planning permission granted in Feb 2016 (S/2014/0728/F) for proposed residential development for 24 units (2 detached houses and 11 pairs of semidetached dwellings)

50	3 X Full Grass Rugby Pitches, 1 X Astro turf Hockey Pitch, 1 X All-Weather Pitch, 1 X Grass Cricket Pitch Wallace High School	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
51	1 X Grass Cricket Pitch Wallace High School	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
52	2 X Full Astro turf Hockey Pitches, 3 X Full Grass Rugby Pitches, 2 X Cricket Pitches, Friends School	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
53	Wallace Park	Lands used for recreation and open space, historic park and garden and sits within an LLPA designation. Therefore unsuitable for housing
54	Playing pitches	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
55	Playing pitches	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
54	Playing pitches	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
55	Playing pitches	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
56	1 X Full Grass Pitch, 2 X All-Weather Hockey Pitches, 5 X Tennis Courts, Fort Hill Integrated College	Land associated with primary school and college and is therefore unavailable for housing
57	Open Space	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
58	Open Space	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
59	Open Space	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
60	1 X Full Grass GAA Pitch, 1 X Grass Training Pitch, St. Patrick's Gac	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing

61	Duncan's Glen Linear Park	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
62	Planning permission granted for residential development	Planning permission granted in October 2018 for housing development (Final phase) 31 units, 2 storey detached and semi-detached dwellings (LA05/2017/0741/F)
63	Permission Granted for residential development – under construction	Planning permission granted in Dec 2016 for the erection of 127 no. Dwellings, comprising detached and semi-detached dwellings, including garages and all other associated siteworks (S/2015/0258/F)
64	Existing Recreation and Open Space	Lands used for recreation and open space, protected under PPS8 and unlikely to come forward for housing
65	Undeveloped – zoned housing lands	The lands remain undeveloped and have not come forward for development. Connected to the wider zoning redevelopment.

Overall it is considered that there are limited land opportunities within the settlement limit, given that the lands identified are already built out, committed, unavailable or hold potential issues with the lands coming forward for housing given that some of those sites have been lying vacant over the last 10 years. A number of identified sites are classified as open/recreation space and whilst proposed policy HOU10 suggests that affordable housing could be permitted on land identified as open space; it should be noted that this applies only in exceptional circumstances and subject to further criteria. On this basis, it is clear that there remains a presumption is against development on open space areas.

Therefore, it is evident that more lands to accommodate future growth within the next plan period will be required and lands that are readily available for housing development be considered for housing in order to aid housing delivery within the settlement.

Proposed site for inclusion within the settlement limits of Lisburn

We therefore draw your attention to the attached lands (Appendix 1) that could be included within the new settlement limit of Lisburn, helping to contribute to the future growth of the settlement.

These lands were previously accepted by the former Lisburn City Council as being suitable for development during the dBMAP Public Inquiry and endorsed by the PAC – see map and relevant section from the PAC report in appendix 2. As such, when the Council come to consider suitable additional lands to facilitate housing growth, these lands should be considered first.

Whilst the PAC recommended that these lands be brought within the settlement limit as a short-term land reserve, the Department of Environment (DoE) decided that there was sufficient development land proposed without the need for such land reserves and therefore the subject lands were not included within the settlement limit.

The underlining rationale for inclusion of the lands as per appendix 1 is to facilitate the delivery of an orbital relief road that runs from Hillhall Road to the Ballynahinch Road – as per the maps in appendix

2. The subject lands include the southern/western section of this orbital relief road, from Plantation Road to Ballynahinch Road. The need for such a relief road was agreed by all parties (including the Council and Roads Service (now Transport NI) along with the need to zone housing land to help fund the orbital road.

Traffic entering Lisburn has been growing over the last decade. Queuing takes place along the slip roads from the M1 at the Saintfield Road interchange and this can queue back on to the motorway. The Traffic signal control at the roundabout was introduced so that a queue detection system on the slip road would call a green traffic signal and allow the motorway traffic to exit the slip road. The consequence of this is that traffic can get delayed on the Saintfield Road in the AM Peak and coming out of Lisburn in the PM Peak. At present, there is no alternative road for drivers along the Saintfield Road to take when this queuing takes place and traffic must queue to get through the Saintfield Road junction.

Drivers from the existing residential area of Plantation currently must wait for a gap in the queuing traffic to gain access to the Saintfield Road and still must queue to get through the Saintfield Road Interchange, so they also need an enhancement to capacity or an improved road infrastructure to allow easier access from the Plantation area. To resolve the existing problems a new road should be put in place to allow traffic an alternative route to the Saintfield Road junction.

The proposal for a southern relief road serves a dual purpose in that it can provide an alternative route to the Saintfield Road, as well as providing an alternative route for traffic to and from Plantation Road. The critical connection on the southern relief road is a link from Saintfield Road to Ballynahinch Road. Ballynahinch Road forms a connection from South Down to Hillsborough Old Road and on to Altona Road, Ravarnet Road and Hillsborough Road at an existing set of traffic lights at Ravarnet Road / Blaris Road. The Saintfield Road currently carries a peak hour flow of c.1650 vehicles per hour where as Ballynahinch Road carries c.530 vehicles in the peak hour. The connection from Saintfield Road to Ballynahinch Road would allow a portion of traffic wishing to enter the Altona, and Hillsborough road area to have the opportunity of using an alternative route to enter Lisburn which would avoid the Saintfield Road Interchange. This would provide an alternative access to the M1 via Hillsborough Road, thereby reducing the impact on the Saintfield Road interchange. The low level of existing trips on Ballynahinch would allow for a higher flow to be accommodated.

The link from Saintfield Road to Plantation Road would provide an alternative means of access for residents from Plantation to gain access on to Saintfield Road. The provision of a new roundabout between the two link roads and the existing Saintfield Road would act both as a gateway into Lisburn and a sense of traffic calming for traffic entering the city. The roundabout would deal with right turning traffic from Plantation on to Saintfield Road providing a much-enhanced access compared to the existing priority junction at the edge of the motorway interchange.

The critical section of the orbital relief road and the subject of this submission, is the section that links Plantation Road, to Saintfield Road to Ballynahinch Road. The section of the orbital relief road in this submission is part of a wider solution that is clearly required to resolve existing congestion issues. Housing development is needed to contribute to the delivery of the relief road but this submission also demonstrates that there is a 'stand-alone' need for more housing land in the south Lisburn area.

The lands as identified in appendix 1 are capable of accommodating development in an appropriate and sustainable manner because:

- The site is well enclosed from the southern approach (along Saintfield Road) due to the topography of the lands, which fall gradually from south to north.
- The southern boundaries of the lands are well-defined by mature vegetation that provides further enclosure and screening and will ensure a strong, defensible boundary on the southern edge of the site.
- The northern section of the lands lie into existing developments, such as Berkley Hall (to the east of the Saintfield Road), Holburn Hall (to the south of Plantation Road) and the new car sales showroom (to the west of the Saintfield Road). The lack of any intervening or separating boundary treatments means that development on site can easily integrate into the existing neighbouring urban developments.

Furthermore, the lands within the red line as highlighted in green, are immediately available and appropriate for development. The inclusion of these lands within the settlement limit will result in a suitable 'rounding off' of the settlement. These lands will:

- Provide a new edge to the development limit that aligns better with adjoining existing development;
- A Key Site Requirement for these lands could include the provision of a landscape buffer that will better defined the urban limit (there is currently no visual containment of the urban area); and
- Development of these lands will provide a stronger urban edge and better defined urban/rural interface.

As the lands in appendix 1 were previously deemed acceptable for development (in principle) by the Council; the inclusion of the orbital relief road in the new Local Development Plan (LDP) along with the zoning of lands for residential development to help fund such a road would provide a viable and deliverable solution to alleviate existing traffic congestion in the area. As we have demonstrated that there is also an increased need for further housing in the Lisburn area; the proposed zoning of the subject lands for residential use not only meets a housing shortfall but also funds a much-needed orbital relief road.

On this basis, we would encourage the Council to consider our client's lands as being suitable lands for the inclusion within the new settlement limit of Lisburn. We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as preparation of the LDP progresses.

Yours Sincerely,

Appendix 1
Suggested site for inclusion within the Lisburn City Settlement Limit

ACEmap® Single

Printed: 23/03/2017 Customer Ref:

Centre Point (Easting, Northing): 328116, 363098

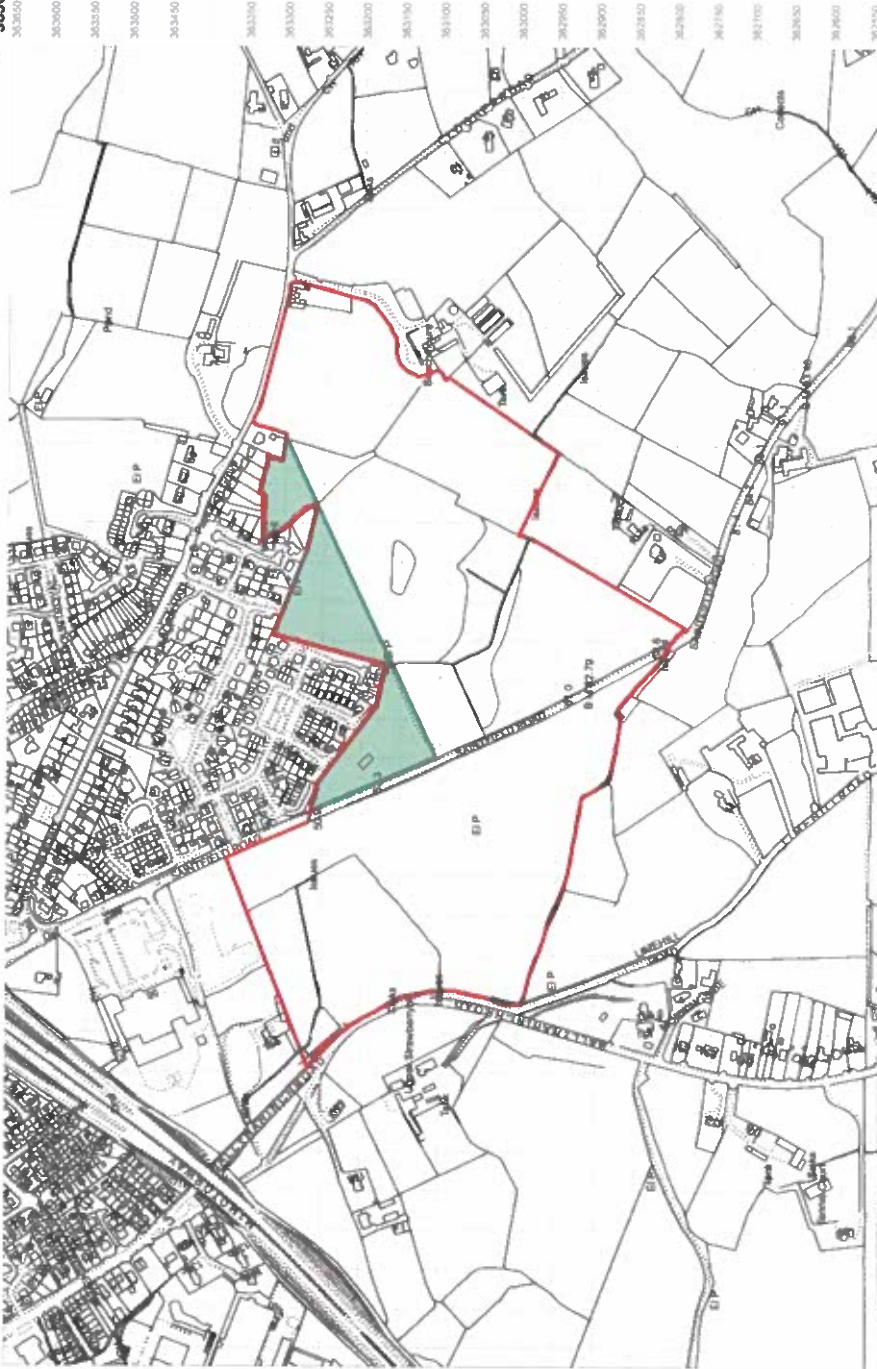
Scale: 1:5,000

Order no. ORD37517

Plan No. 16511SW2

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Appendix 2
dBMAP PAC Public Inquiry Papers

whiteland. The objector made it clear at the inquiry that major development was not proposed on the site. No development was suggested within the SLNCI and there was no objection to the LLPA provided that it did not totally preclude any development on the site.

The site would represent a modest addition to the development limit in this area. The Department had conceded the triangle of land NW of LC 09 (defined by Ballinderry and Lissue Roads) for residential development. The objector (Lisburn City Council) confirmed that this site was no longer being pursued. Nevertheless the Departmental concession means that this site would have been included within the settlement limit by default.

We agree that parts of the site do present a more urban appearance i.e. the house, car park terrace, a rear yard and extensive outbuildings. The site boundaries defined to the north by a major embankment and to the west (NW) by trees would represent a strong development limit. We consider that any development on the site would be limited by the setting of the listed building and by the LLPA designation. The LLPA would not totally preclude development and so we consider that there is no objection to the designation in the objectors' own words. The SLNCI was not objected to either, as there would be no development in this area. We consider that problems related to vandalism outside office hours could have been resolved by the planning permission for two dwellings on the site. In the light of the Department's concession, the site boundaries, its limited scale and the buildings on the site we consider that the site should be included with the development limit as whiteland.

Recommendation

We recommend that the site be included within the development limit for Lisburn.

PLANTATION AREA

Objection 2141 – Hillhall Road to Ballynahinch Road (Also includes other objections listed below)

We set out the agreements that were reached in respect of the objections in this area and the remaining areas of dispute. We also wish to clarify what objections were withdrawn and what sites were reduced.

In relation to the sites between Ballynahinch Road and Saintfield Road: we note that objection 934 was withdrawn, as was that part of 2140 within 934 and objection 3273. It is clear that the objections were withdrawn because a large garden centre has been approved on that site. At the time of writing this store was under construction together with a right turning lane on Saintfield Road. We are also aware that the site had benefitted from planning permission for a hotel, granted several times over the years since the 1970s, the last being in 2002. However, these lands are still before us because they were included in objections 2022/3, 2985 and 3690. We note that overlapping objections 3073, 3690 and 3692 were reduced to a smaller site by the objectors in their statement of case.

The RDS identifies Lisburn as a major growth location, particularly in view of its accessibility to key transport corridors. This area is adjacent to a major junction on the

M1 and accessible to Lisburn city centre and its transport links. We can see the logic of the Department's concessions in this general area. The strategy to avoid the nearby AOHSV and LVRP in the conceded lands is justified and logical. We support the concessions as indicated on the Department's map. The limit would generally follow field boundaries. The concessions would allow for comprehensive planning in this area and the provision of an orbital road relieving pressure on the roundabout under the M1 (discussed below). The sole remaining question is whether the proposed road should constitute the boundary. We consider that this is a detailed design matter. But where it is the boundary, generous planting will be required as a landscape buffer along the road. We consider that this matter can be considered as part of the Masterplan process. In summary, we agree with the Departmental concessions in general terms subject to certain exceptions, which will be discussed below.

Lisburn City Council wished to see an orbital road provided in conjunction with residential development on any additional sites. This would run from Hillhall Road to Ballynahinch Road, linking Plantation and Saintfield Roads in the process. The Department conceded that this was a good idea and stated that additional lands could be included within the settlement limit in order to meet the requirement for 3-year flexibility and in order to fund the road. They expressed some concerns regarding the final leg of the proposed road from Saintfield Road to Ballynahinch Road. It was considered that development south of the store would erode the gap between Plantation and Morningside to the SW. However, at the inquiry they agreed that a road link was required at this location. An indicative line was agreed and presented to the inquiry. This seemed to be agreed at the behest of Roads Service; who were opposed to a staggered junction on the Saintfield Road. We consider that the proposed road from Hillhall Road to Saintfield Road is a valuable idea.

The Department had already conceded that the land contained within objection 934 (subsequently withdrawn) should be included within the development limit. This comprises the garden centre site and the field to the south. We question the case for the final western leg of the road because of the Department's concerns and the approval of the garden centre. We also question the need for additional housing land in this location and its deliverability given the presence of the garden centre and the Department's generous concessions south of LC 04/10. We therefore consider that should this stretch of road be required then it should follow the line shown on the Turley Associates plan rather than the dotted line agreed at the inquiry. This is despite the concerns of Roads Service, which were not clarified for us at the inquiry.

The conceded lands include all or most of the following objections – 662, 2022/3, 2985, 3073, 3074, 3241, 3690 and 3692. Objection 2140 encompassed all of the above lands. The objector was content with the Departmental concessions save for two areas: north of Hillhall Road and west of Saintfield Road. We have addressed the area between Saintfield Road and Ballynahinch Road above. Our comments also apply to the small part of the reduced area of objections 3073, 3690 and 3692 that was not conceded by the Department. We will address the area north of Hillhall Road in the Lagan Valley Regional Park volume of our report.

Plantation Amenity and Planning Action Group (objection 3584) expressed concerns that the inclusion of additional lands at Plantation could not be accommodated by the existing roads infrastructure. We consider that the provision of the orbital road and the improvements to the Saintfield Road roundabout that have already been implemented

would address these concerns. We note that Roads Service had no objection to the Department's concessions.

One objector made the point that sites found to be acceptable in the Department's June Paper should not be required to contribute to the orbital road. We do not concur with this view. This would only apply to 934 (now the site of the Garden Centre) and 3241 (small site filling the triangular gaps in the development limit to the south of Plantation). 934 is withdrawn and already developed. It would be extremely difficult to disaggregate 3241 from the remainder of the lands for this purpose. It would also be contrary to proper comprehensive planning of the area.

The lands considered suitable for housing are not needed to meet the HGI and in view of our conclusions in Part 1 of the report, we recommend that they are held in a land reserve and only released if required.

Recommendations

We recommend that the lands shown within the 'Proposed Revised Development Limit' on Plan 2 are suitable for housing and should be held in a short term land reserve to meet housing needs beyond the end of the Plan period, if required.

We consider that key site requirements should address the following matters:

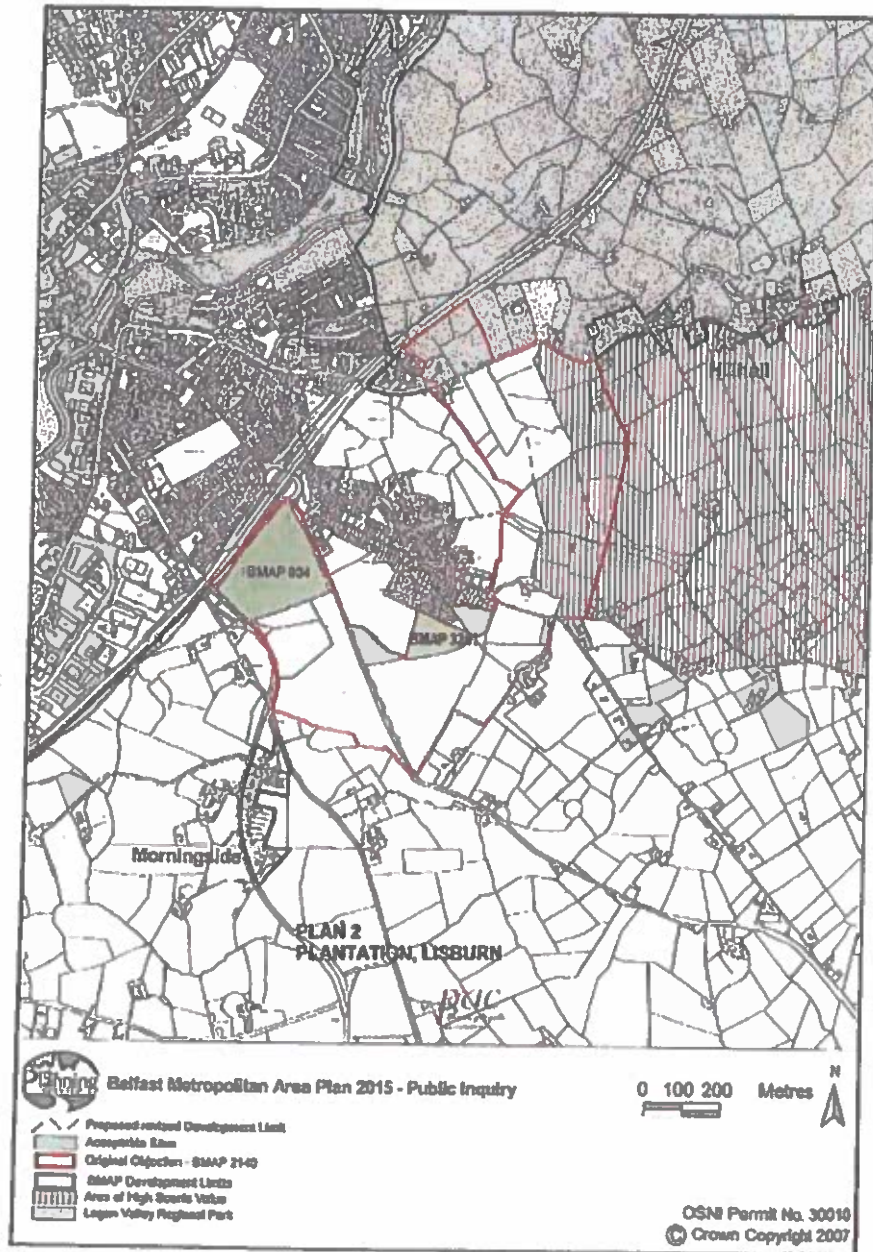
- The submission for approval of a Masterplan to facilitate the comprehensive development of the site as a whole.
- The provision of an orbital road linking Hillhall Road – Plantation Road – Saintfield Road – Ballynahinch Road to be fully funded by developer contributions..
- The developer should be aware that improvements to Hillhall Road and Saintfield Road may be required, depending on the conclusions of a transport assessment for the additional lands.
- Landscaping along the proposed orbital road as appropriate. Other landscaping issues can be addressed as part of the Masterplan process.

Other key site requirements have been addressed in our general approach outlined previously.

Objection 2141 – Lands North of Hillhall Road (see LVRP Volume)

Objection 3178 – lands South of Hillhall Road

One field of this objection was conceded by the Department as part of objection 2140. The remainder of the site falls to be considered. The eastern half of the site is within the area of high scenic value. There was no associated objection to this designation. We agree with the Department that this is a constraint on development. We consider that the remainder of the site (outwith the conceded field) if included would represent an unwarranted intrusion into the countryside. It would create an illogical extension to the settlement limit in one direction and has not been justified by any exceptional circumstances. The remainder of the site would relate poorly to the other sites conceded by the Department and would be outside the proposed orbital road. We recommend that the remainder of this site is not included within the development limit.

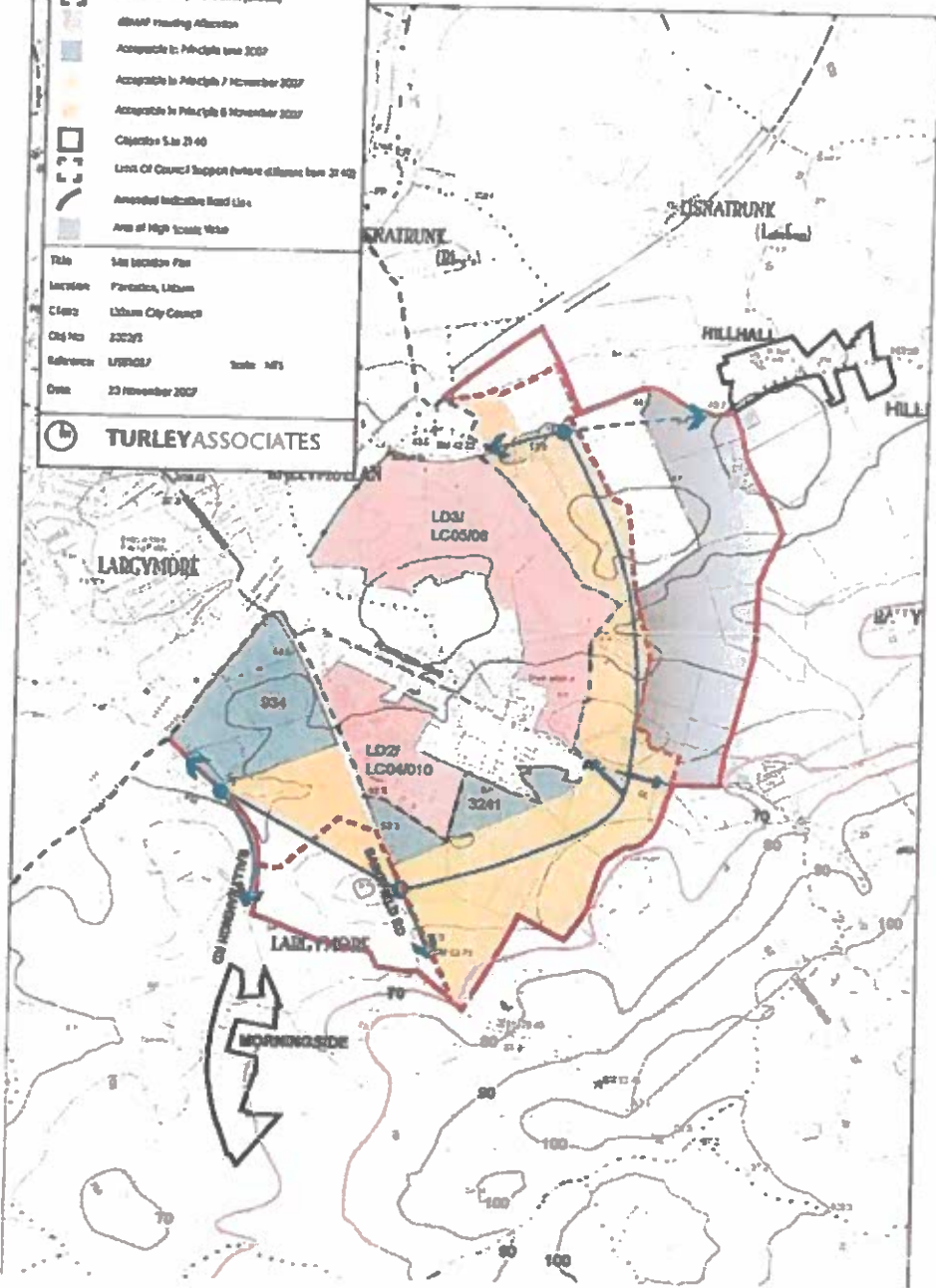


Key

- CDMP Development Limit (Extract)
- CDMP existing allocation
- Acceptable in Principle 2007
- Acceptable in Principle 7 November 2007
- Acceptable in Principle 6 November 2007
- Objector Site 21-40
- List of Council Support (where different from 21-40)
- Amended Indicative Road Line
- Area of High Speed Water

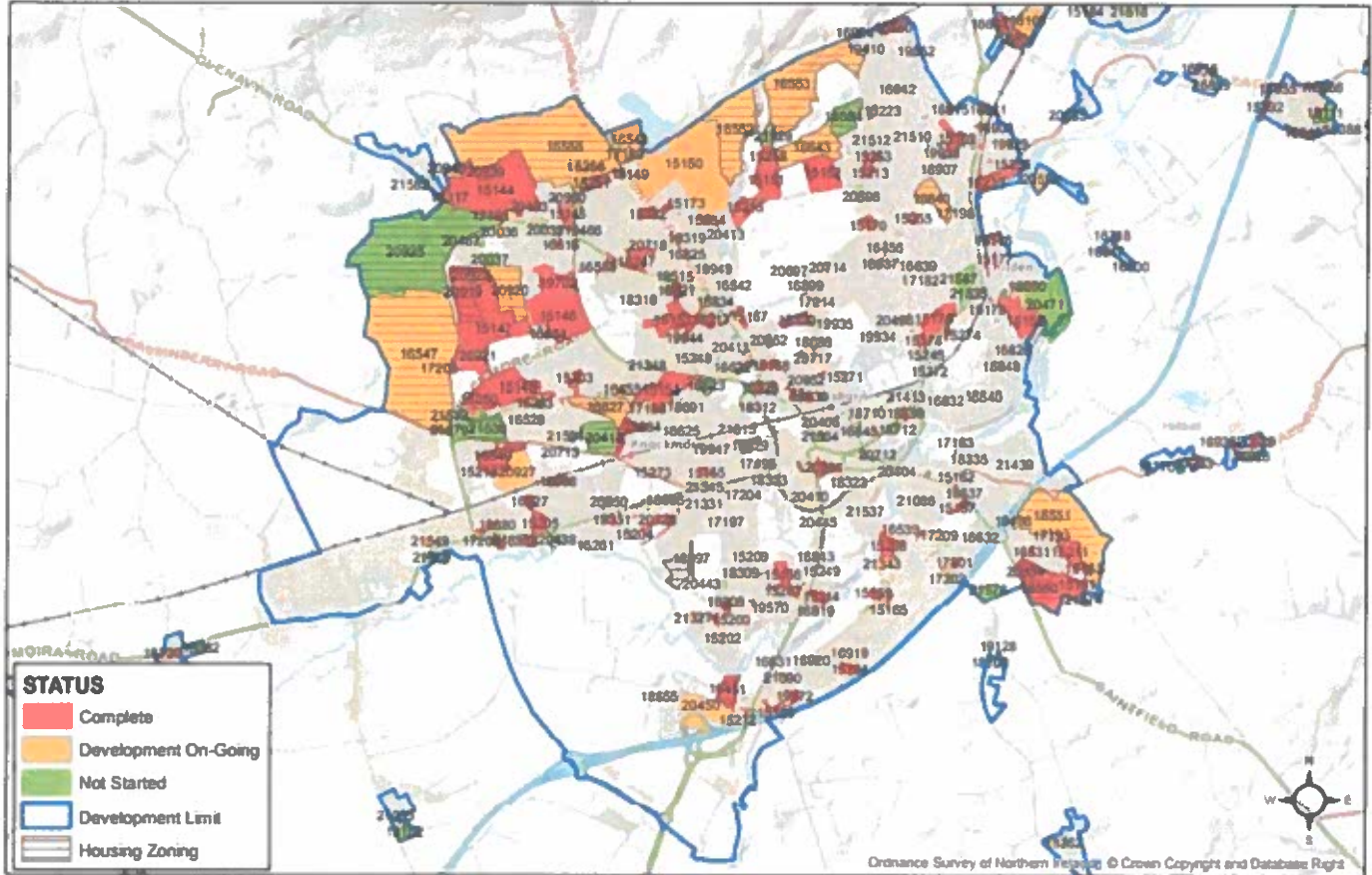
Title: Site Location Plan
 Location: Parvata, Litham
 Client: Litham City Council
 Obj No: 23235
 Reference: L/0408/7 Scale: A1:1
 Date: 23 November 2007

TURLEY ASSOCIATES



Appendix 3
Lisburn and Castlereagh Housing Monitor data 2017

Lisburn City Housing Monitor 31 March 2017



Full Housing Monitor Document:

https://www.lisburncastlereagh.gov.uk/uploads/general/Annual_Housing_Monitor_Report_2016-17.pdf

Site Ref	Site Name	Date of Survey	Units Complete	Remaining Potential	Area Developed	Area Remaining	Development Status	Completion Date
SETTLEMENT TOTALS			7730	4606	306.47	164.98		