

BY EMAIL AND POST10th January 2020

Our Ref: C04301

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 located at Greengraves Road, Dunlady Road, and Ballyhanwood Road, Dundonald

This letter is submitted on behalf of our client Fraser Houses Ltd 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 housing in order to contribute towards meeting the housing need for the district as set out in the strategy.

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 Greater Urban Area (including Dundonald) should be considered as providing opportunities for housing and employment of an appropriate scale and character.

- *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%)
Moira	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 **1,628** 'potential units remaining' in Castlereagh Greater Urban Area, with an additional 103 potential units on 'Urban Capacity Sites' and 291 potential windfall units, which results in a total potential of **2,022** units within the Castlereagh 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. The 2,400 figure is set out within the West Lisburn Development Framework Document.

Finally, 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 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.

Furthermore, it is suggested 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). This is unacceptable given that these sites cannot be relied upon for housing delivery, therefore social housing has not been provided for.

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%)	1,628	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 21% of the overall housing allocation figure to Castlereagh Greater Urban Area, 4,182 new dwellings will be required within this 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

Appendix D states that Castlereagh Greater Urban Area at Dundonald is served by WwTWs at Kinnegar located within Ards & North Down Council Area. This includes flows from Crossnacreevy & Ryan Park which has remaining capacity and is therefore capable of accommodating further residential development.

It is acknowledged that 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.

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 be amended to read 'main towns' rather than 'town centres', as the policy as written is currently too restrictive limiting the location of housing developments within town centres only. Housing growth should be promoted within the totality of the main towns 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 HOU4, 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 Dundonald

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.

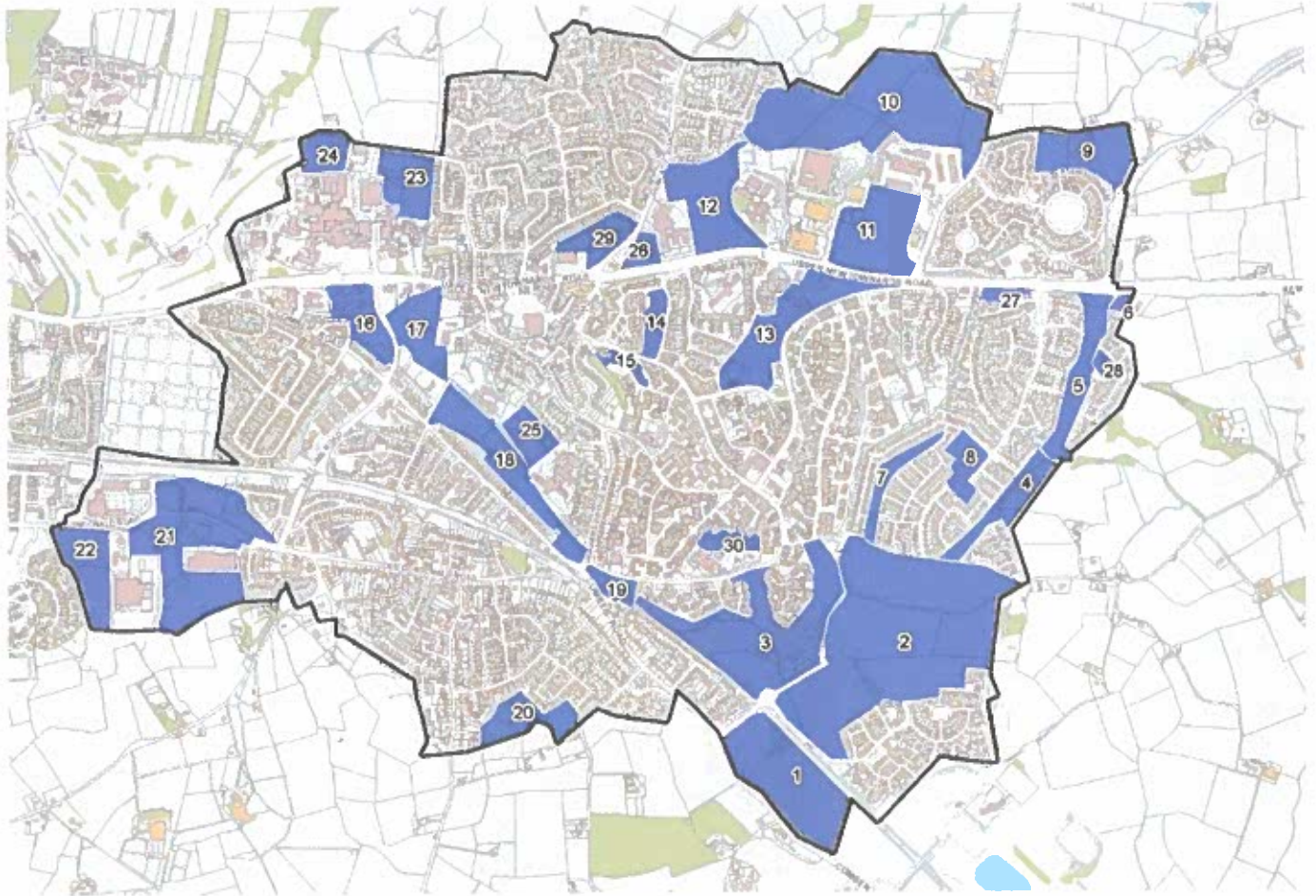
The Strategic Housing Provision sets out that there are 1,628 'potential units remaining' in Castlereagh Greater Urban Area, with an additional 103 potential units on 'Urban Capacity Sites' and 291 potential windfall units, which results in a total potential of 2,022 units within the Castlereagh Greater Urban Area. However, on the basis of our arguments set out within Strategic Policy 08 above, which apportions 21% of the overall housing allocation figure to Castlereagh Greater Urban Area, 4,182 new dwellings will be required within this area within the next plan period.

We consider that Dundonald should be the focus for development in the Greater Urban Area given that it accommodates over half of the population (16,098) of the Greater Urban Area and has excellent transport links and local amenities for new residents to avail of.

The latest Housing Monitor (Appendix 2) for the Council Area relates to 2016-2017 identifies that Dundonald has a remaining potentially suitable lands to accommodate 1,871 units (105.35ha). This also represents a shortfall of 2,311 units to our suggested housing allocation for the Castlereagh Greater Urban Area. Based on population, the suggested housing allocation for Dundonald would be 2,175 dwellings, therefore this still represents a shortfall of 304 dwellings.

However, 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 Dundonald 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 map below:



Site Ref	Status	Site Potential	Approximate Potential Yield
1	Application Submitted – pending consideration	Planning application submitted for the proposed mixed-use development comprising housing (119 units) and 18 no. industrial units (Class B1b/B1c and B2 employment uses) with associated public open space, related access improvements, parking and ancillary site works. (Additional Roads Information)	119 units
2	Zoned housing lands	Reserved matters granted in June 2017 for a residential development of 483 dwellings comprising detached and semi-detached, townhouses and apartments including distributor road, cycle/footpaths, access,	483 units

		landscaping and associated site works (reduction in residential unit numbers). (Y/2009/0303/RM). A number of amendment applications also submitted.	
3	Lands largely existing recreation and open space	<p>The lands largely comprise amenity green space, land to the east of Longstone School. The site is also designated under MCH 38 as a Local Landscape Policy Area (Moat/Enler, Metropolitan Castlereagh) and includes Comber Greenway.</p> <p>The site has issues in terms of flooding, with Enler river traversing the site and surface water issues which limit the sites potential. The south of the site beyond the River is the only portion which may hold some development potential (approx. 3ha)</p>	60 dwellings
4	Undeveloped – zoned housing lands MC03/06	The site is currently undeveloped as the lands have been reserved for a road scheme (MCH 14/02 Quarry Corner Comber Road Dundonald). However, the road scheme has not come forward since first proposed in BUAP 2001. We consider the need for the link road has been diluted, the logical approach is therefore to redevelop the site in line with its land zoning for residential use.	42 dwellings
5	Undeveloped – zoned housing lands MC03/06	<p>Similar to the above site, the lands are currently undeveloped as the lands have been reserved for a road scheme (MCH 14/02 Quarry Corner Comber Road Dundonald). However, the road scheme has not come forward since first proposed in BUAP 2001. We consider the need for the link road has been diluted, the logical approach is therefore to redevelop the site in line with its land zoning for residential use.</p> <p>A PAN submitted in April 2019 for residential development of circa 65 dwellings (LA05/2019/0409/PAN)</p>	65 dwellings

6	Undeveloped - zoned housing lands MC03/06	The site is zoned housing lands but has not been incorporated into the redevelopment south of the site (LA05/2015/0339/F) which comprises a development of 8 dwellings, made up of 4 semidetached houses, 1 detached house and 3 townhouses. Given that a connected approach has not been achieved here and that there is a large single residential plot neighbouring the site to the east. There may only be limited potential on the site which may be able to accommodate 1-2 dwellings.	1-2 dwellings
7	Undeveloped - zoned housing lands MC03/06	The site acts as a buffer between housing within the Coopers Mill development due to sudden change in gradient. The site topography restrains this strip of land from being developed, given that there would be potential neighbouring residential amenity issues should it be developed.	0 dwellings
8	Lands partially existing recreation and open space with the remainder being zoned housing lands	Lands partially existing recreation and open space with the remainder being zoned housing lands with potential of circa 20 units.	20 dwellings
9	Undeveloped - zoned housing lands MC03/06	PAN submitted in January 2019 relating to the erection of 66 no. dwellings (comprising detached and semi-detached dwellings) with garages, open space, landscaping, access and associated site works.	66 dwellings
10	Undeveloped – zoned employment and industry lands	Outline application approved in August 2016 (Y/2013/0064/O) relating to Industry and commerce as zoned in the Belfast Metropolitan Area Plan 2015 to include Class B1 Business, Class B2 Light Industrial, Class B3 General Industry and Class B4 Storage or distribution (amended description of proposal) PAN submitted (LA05/2019/0643/PAN) in June 2019 for Industry & Commerce as zoned in the Belfast Metropolitan Area Plan 2015. Approved for Use Classes, B1 (b) call	0 dwellings

		centre, B1 (c) research and development, B2 light industrial, B3 general industrial and B4 storage and distribution. Main entrance from Carrowreagh Road.	
11	Undeveloped – zoned employment and industry lands	Unsuitable for housing given employment and industrial zoning.	0 dwellings
12	Existing Recreation and Open Space - 1 x full grass pitch, all-weather running track, Dundonald High School	Unsuitable and unavailable for housing given that the site is existing recreation and open space in the form of playing pitches	0 dwellings
13	Existing recreation and open space - Dungoyne Park with 1 x full grass pitch	Unsuitable and unavailable for housing given that the site is existing recreation and open space in the form of playing pitches	0 dwellings
14	Amenity Green Space, Davarr Avenue, Dundonald	Unsuitable and unavailable for housing given that the site is existing open space	0 dwellings
15	Amenity Green Space, Morven Park, Dundonald	Unsuitable and unavailable for housing given that the site is existing open space	0 dwellings
16	Existing Recreation and Open Space Moat Park, Dundonald	Unsuitable and unavailable for housing given that the site is existing open space	0 dwellings
17	Existing Recreation and Open Space Moat Park, Dundonald	Unsuitable and unavailable for housing given that the site is existing open space	0 dwellings

18	Existing Recreation and Open Space Play pitches at Moat Park, Dundonald	Unsuitable and unavailable for housing given that the site is existing open space in the form of playing pitches	0 dwellings
19	Undeveloped	The site remains undeveloped but contains access to Comber Greenway. The site has limited development potential given that the Ender River traverses the site and the site is also designated within a Local Landscape Policy Area.	0 dwellings
20	Undeveloped – zoned housing lands MCH 04/12	Planning Permission granted in September 2018 for residential development of 46 No houses	46 dwellings
21	Undeveloped	Lands located within landscape wedge (MCH26) and Local Landscape Policy Area. PAN submitted in January 2019 for the lands relating to the phased demolition of existing Dundonald International Ice Bowl and redevelopment to include new Olympic size ice rink, ten pin bowling facility, children's soft play area and adventure play area, climbing facility, primary healthcare facility, community/council facility, gymnasium, offices, food outlets and general support accommodation. To include the provision of new parking areas and reconfiguration of existing, an external play area and associated access and site works	0 dwellings
22	Undeveloped	Lands zoned for housing to the east – permission granted on neighbouring site for 30 no. residential units comprising of 5 residential blocks of 6 no. apartments per block. The site is located within landscape wedge (MCH26) and Local Landscape Policy Area. If site come forward it would close the gap and eliminate the landscape wedge in which its function is to define and separate urban	78 dwellings

		areas, therefore housing on site may not be forthcoming.	
23	Car park	The site is utilised as a car park for the Ulster Hospital and therefore is unavailable for housing	0 dwellings
24	Complete	Site now redeveloped as part of Ulster Hospital development (Y/2013/0155/F) and is therefore unavailable for housing	0 dwellings
25	Complete	Planning permission granted in 2012 for the construction of grounds maintenance storage facility and bus parking compound with new 4m high fencing to enclose storage facility and bus parking compound (Y/2012/0143/F). The site is therefore unavailable for housing.	0 dwellings
26	Existing Car Park	Existing Car Park associated with Tor Bank School. The site is therefore unavailable for housing.	0 dwellings
27	Open Space associated with residential development	The site is open space associated with the approved residential development to the south at Quarry Corner (Y/2013/0166/F).	0 dwellings
28	Planning permission granted	Planning permission granted in June 2016 for the demolition of existing properties to facilitate development of 19 No. dwellings comprising of 2 No. detached houses, 12 No. semi-detached houses and 5 No. apartments with associated parking, landscaping, site and access works (Y/2014/0384/F)	19 dwellings
29	Planning permission granted	Proposed site for the construction of a park and ride development with parking for 521 vehicles and to include disabled parking, public toilet, bicycle stands, dedicated bus access and terminal building (Y/2013/0190/F). Planning permission granted in December 2013.	0 dwellings

30	Amenity Green Space, land to the east of Longstone School, Dundonald	Unsuitable and unavailable for housing given that the site is existing recreation and open space	0 dwellings
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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. It is considered that even if the above lands were suitable for redevelopment they would accommodate 1,000 dwellings, representing a shortfall of 1,175 dwellings from the suggested housing allocation for Dundonald (based on population). 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 Dundonald

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

Site 1: Lands at Greengraves Road

The lands are located to the east of Castlereagh Greater Urban Area (Dundonald). The lands are larger undulating in nature and extend to approximately 35ha. These lands are particularly well suited to accommodate expansion to the current settlement limit to accommodate future housing growth for the following reasons;

- The lands abut the current settlement limit;
- The site can currently be serviced via the Greengraves Road;
- Development on the site would appear integrated into the landscape on the lower levels of the drumlins, with the higher drumlins restricting views of any development, providing a backdrop that will visually contain development;
- The lands were deemed acceptable for development by the PAC during the Public Inquiry of the draft Belfast Metropolitan Area Plan. The PAC stated that the site had many benefits including its close proximity to the EWAY, Employment Areas and key transport routes to Belfast, Newtownards and Comber. However 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 proposed lands are located between two Rural Landscape Wedges (RLW) CR05 to the north and CR 06 to the south, the main function of these RLW's is to distinguish and maintain the setting of Dundonald on the approaches from the Upper Newtownards Road and the Comber Road and to also protect the setting of Comber and Newtownards. While the site is located within the southern section of CR05, the integrity of the RLW will be maintained as development on the lands between these RLW will have little impact on the setting of these

settlements and the any future development on the lands will not lead to any physical or visual coalescence with Comber or Newtownards given the intervening topography and distance. In addition to this, the remaining portion of the Rural Landscape Wedge (CR05) will still protect the setting of Dundonald on the approach from the Upper Newtownards Road as any proposed development will not be viewed from this approach due to the undulating nature of the lands and vegetative buffer along the roads edge;

- The site is not affected by any areas of flooding;
- The Upper Newtownards Road is one of the main arterial routes into Belfast.

Site 2: Lands at Dunlady Road

The site which is circa 8.2ha is located to the north of Dundonald between Ballyreagan Road and Dunlady Road and rise gradually in a north/north westerly direction.

These lands are particularly suited to accommodate expansion of the current settlement limit for the following reasons:

- The lands directly adjoin the existing settlement limit;
- The Ballyreagan Road and Dunlady Road act as strong defensible boundaries limiting future growth to the east and west;
- The lands rise gradually from the settlement limit at the south to the northern and western portion of the lands, the lands to the north of the site continue to rise in excess of another 20m-30m therefore this will provide a backdrop and will ensure that any future development will not be visually prominent in the landscape;
- Due to the topography of the lands, views from the Ballymiscaw Road towards the site and the rest of metropolitan Castlereagh will be intermittent;
- The eastern boundary of the lands along the Dunlady Road, are bounded by a dense vegetative boundary limiting views into and out of the site;
- Previous development plans for the subject lands proposed a dense vegetative buffer and open space to the north of the site which would help to further contain any views of the site when travelling south along the Dunlady and Ballyreagan Road;
- While the lands fall within the Craigtlet Woods (MCH 28/05) Area of High Senic Value (AOHSV) and Area of Special Scientific Interest (ASSI) and Ballyreagan Glen LLPA (MCH 29) that currently bisects the site, any future proposal will have minimal impact on the features of these designated sites, which includes a designated mound to the north of the LLPA outside the side and a heavily wooded glen. As there will be no trees removed as a result of any future development proposal, development proposals can be sensitively designed to incorporate this designated woodland area;
- Development up to a 73m contour was deemed acceptable in principle during the dBMAP Public Inquiry by the Planning Appeals Commission (PAC).

Site 3: Lands at Ballyhanwood Road

The lands are circa 12.44ha and are located to the east of the Ballyhanwood Road. The rational for the inclusion of the potential lands includes;

- The north eastern boundary of the lands abuts the current settlement limit;
- The gently rolling agricultural lands are well defined by hedgerows and mature trees, therefore views of any future development would be well contained;
- While Fort/Ballyhanwood Local Landscape Policy Area is located adjacent to the site, those features that contribute to the environmental quality, integrity or character of this LLPA, which include an unnamed Rath site located south of No. 1 Fort Road, areas of open space associated with No. 27 and No. 33 Ballyhanwood Road, adjacent to a stream and an Area of local nature conservation interest (Mixed tree cover), will not be directly impacted by any development on the site;
- The site is located within the Castlereagh Slopes Area of High Scenic Value but future development will not have an adverse effect on the quality, character and features of interest in this Area of High Scenic Value. The natural vegetative boundaries of the site will provide a degree of natural enclosure, the abutting residential developments will also help with the integration of any future dwellings;
- Although a small stream is located between the two fields abutting the Ballyhanwood Road, a review of online Flood Maps indicates that the lands will not be affected by any flooding.

On the above 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 Dundonald. 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,

Lisa Shannon

Gravis Planning

Appendix 1
Suggested lands for inclusion within the Dundonald Settlement Limit

Site 1: Lands at Greengraves Road



Site 2: Lands at Dunlady Road

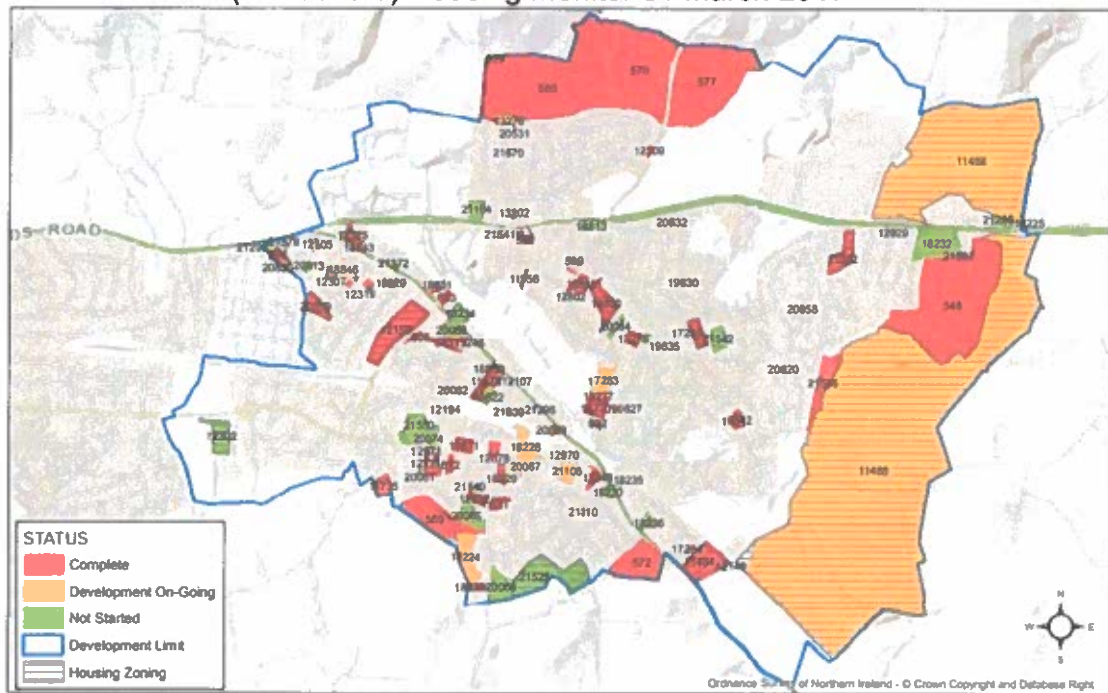


Site 3: Lands at Ballyhanwood Road



Appendix 2
Lisburn and Castlereagh Housing Monitor data 2017

Castlereagh Greater Urban Area (Dundonald) 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			4572	1871	233.17	105.35		