

# Representation to Draft Plan Strategy

## Lands at Back Road, Drumbo

January 2020

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9 Jan 2020

## Executive Summary

1. This representation is submitted on behalf of \_\_\_\_\_ response to the consultation on the Lisburn & Castlereagh City Council (LCCC) draft Plan Strategy (dPS).
2. Our client welcomes this opportunity to respond to the Council's invitation to join the debate on the key issues of strategic significance which are likely to influence the direction of future development within the Council area.
3. This representation relates to land which is not currently zoned under the Lisburn Area Plan 2001 or the draft Belfast Metropolitan Area Plan.
4. Commentary is provided in relation to the relevant policy and strategic considerations set out in the Draft Plan Strategy (dPS), having regard to the site specific interest.
5. Below is a summary of our key comments we wish to make in relation to the Draft Plan Strategy.

### Schedule of key draft Policy Comments

Policy	Comment	Para ref.
Plan Period to 2032	The plan period to 2032 is too short. This is inconsistent with the SPPS requirement for a long term spatial strategy and Departmental Guidance on a 15 year framework which must logically be from adoption.  The plan is unsound as it fails Consistency Test C3.	2.2-2.10
SP08 Housing Allocation & Housing Distribution	We are generally supportive of objective A but insofar as Strategic Policy 08 Housing in Settlements is the policy which refers to the Strategic Housing Allocation (SHA), this draft Policy is unsound because the SHA set out in Table 3 is unsound for the following reasons: <ul style="list-style-type: none"> <li>• The SHA sets out plans for too few new homes over too short a period and under-allocates, with the potential to undermine the Spatial Strategy and Plan Objective A.</li> <li>• It does not take sufficient account of the RDS insofar as it is understood to direct a scale of growth to the main settlements and achieve a complementary urban/rural balance with reference to the Housing Evaluation Framework.</li> <li>• Neither does it sufficiently recognise and plan for cross-boundary connections in the context of the HMA or provide a framework sufficient to address the significant requirement for social/affordable</li> </ul>	3.3-3.88 & 4.1-4.11

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homes within the plan area.

- It over-estimates the potential contribution of various sources of housing supply including housing monitor sites and urban capacity sites. In particular, it over-relies upon the delivery of housing at West Lisburn/Blaris at a pace and scale which is unlikely, with limited consideration of alternative options.

Draft Policy SGS3 is, therefore, unsound as the policy, (and Strategic Housing Allocation) fails soundness tests Consistency Test C1, Consistency Test C4, Coherence & Effectiveness Test CE1, Coherence & Effectiveness Test CE2 and Coherence & Effectiveness Test CE4.

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6. We wish this representation to be dealt with by Oral Hearing.

# 1. Introduction

- 1.1 This representation has been prepared on behalf of our client, in response to a consultation on the Lisburn and Castlereagh City Council ('the Council') Local Development Plan (LDP). On 11 October 2019, the Council published their LDP draft Plan Strategy ('DPS') for consultation. This representation responds to the contents of the POP.
- 1.2 The following background documents, prepared by the Council have also been considered in preparing these representations:
- Technical Supplement 1 – Housing Growth Study;
  - Technical Supplement 2 – Urban Capacity Study;
  - Position Paper - Population and Growth; and
  - Position Paper – Housing and Settlements.

## **Structure of the representations**

- 1.3 Chapter 2 provides a review and commentary in respect of the Council's overall vision and plan objectives.
- 1.4 Chapter 3 provides feedback in respect of the Council's strategic policies and spatial strategy, particularly in relation to the level of housing provision allocated to villages such as Drumbo.
- 1.5 Chapter 4 sets out the strategic case for further growth in Drumbo, particularly in relation to the subject site.
- 1.6 Chapter 5 sets out our concluding comments in respect of the key issues within the DPS.

## 2. Vision & Plan Objectives

### Vision

2.1 Our client supports the Council's vision which states;

*'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.'*

2.2 We note the six objectives set out which have been developed to deliver the Council's overall vision for the area. The Council are seeking to deliver;

- A Quality Place;
- A Thriving Place;
- A Vibrant Place;
- An Attractive Place;
- A Green Place; and
- A Connected Place.

2.3 These objectives 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** (our emphasis)*

2.4 The LDP will seek to promote and achieve these objectives over a 15 year plan period, from 2017 up to 2032.

### Plan Period

2.5 The plan horizon is to 2032, with the plan referring to a 15 year period from 2017 to 2032. On the basis of the Council's latest published timetable, the Local Policies Plan (LPP) part of the plan is not anticipated to be adopted until Q4 2024, well into the stated plan period.

2.6 Paragraph 5.1 states that meeting the timetable is dependent upon Member involvement, adequate resourcing and careful risk management, recognising that there are factors that could potentially impact upon the timescale for delivery of the LDP. Adequate resourcing must reasonably be taken to refer to the LDP team, consultees, the Independent Examiner and Dfl.

2.7 Whilst it is accepted that the timetable is indicative, subject to review and can be revised, taking into account the potential risks to the process it may be optimistic to suggest that the LPP part of the Plan would be adopted by the end of 2024.

Comparisons with the pre-2015 plan making regime may be difficult to make given the changes but as a matter of fact, even if the Council's indicative timetable is achieved, it will have taken nine years to get to the point of adoption of the LPP.

- 2.8 The length of time it takes to prepare applications and secure planning permission on freshly zoned land (should it be required) is also an important consideration – a newly zoned site for housing or employment in 2024 of reasonable scale would not be likely to be able to be commenced and make any significant contribution until 2027, with substantive delivery likely to extend well into the next plan period on the basis of the current stated end date of the plan. This would suggest the importance of a strategic and long term view to ensure continuity of deliverable housing supply into the next plan period.
- 2.9 Whilst it is obviously understood that plans are material beyond their stated end date, given the time and resources being invested in the process by the Council, consultees and stakeholders, getting the most out of the plan making process is critical, particularly given the age of the statutory plans for Lisburn and Castlereagh.
- 2.10 Belfast City Council has taken a slightly longer term view and established a plan period to 2035. A longer plan period, to 2035 would make it more likely that the final plan could clearly and distinctively move the statutory plan for the Borough beyond the 'inherited' strategies, limits and zonings of the legacy plans. It would also bring the plan into line with the SPPS (para 5.7) reference that LDPs should provide a long term spatial strategy and the DPPN 01 reference (para 2.6) to a 15 year framework. Whilst a different jurisdiction, the NPPF (para 22) is clear that the 15 year period is post adoption of strategic policies.
- 2.11 The risk is that unless a longer term view is taken, when the LPP part of the plan is finally adopted, comparison with the previous plans could raise questions around what has actually changed. Given the relatively limited change from, for example, Lisburn Area Plan 2001 to BMAP, the concern would be that plans adopted nearly 40 years apart would not be that different. With the repatriation of planning to local government the expectation around the new Council's first plan is understandably high.
- 2.12 An alternative to selection of a longer plan period would be to identify additional reserves of land to bridge a gap which might emerge in the form of an over-allocation. This has been the practice in other plan-making exercises such as the Lisburn Area Plan 2001 and BMAP, in the form of flexibility allowances/land reserves.
- 2.13 In summary, the Plan should have a longer plan period in order to be consistent with policy and guidance issued by the Department and is presently unsound with reference to Consistency Test C3.

### 3. Strategic Policies & Spatial Strategy

#### **Spatial Strategy**

- 3.1 We are generally supportive of the Spatial Strategy but have concerns about how it will be delivered with reference to the Strategic Housing Allocation.

#### **Settlement Hierarchy**

- 3.2 We have no issues with the Settlement Hierarchy set out by the Council and note Drumbo's continued status as a Village.

#### **Plan Objective A: A Quality Place – Strategic Housing Allocation**

- 3.3 We are generally supportive of this objective but insofar as Strategic Policy 08 Housing in Settlements is the policy which refers to the Strategic Housing Allocation (SHA), this draft Policy is unsound because the SHA set out in Table 3 is unsound for the following reasons:

- The SHA sets out plans for too few new homes over too short a period and under-allocates, with the potential to undermine the Spatial Strategy and Plan Objective A.
- It does not take sufficient account of the RDS insofar as it is understood to direct a scale of growth to the main settlements and achieve a complementary urban/rural balance with reference to the Housing Evaluation Framework.
- Neither does it sufficiently recognise and plan for cross-boundary connections in the context of the HMA or provide a framework sufficient to address the significant requirement for social/affordable homes within the plan area.
- It over-estimates the potential contribution of various sources of housing supply including housing monitor sites and urban capacity sites. In particular, it over-relies upon the delivery of housing at West Lisburn/Blaris at a pace and scale which is unlikely, with limited consideration of alternative options.

- 3.4 Draft Policy SGS3 is, therefore, unsound as the policy, (and Strategic Housing Allocation) fails soundness tests Consistency Test C1, Consistency Test C4, Coherence & Effectiveness Test CE1, Coherence & Effectiveness Test CE2 and Coherence & Effectiveness Test CE4. The analysis underpinning these conclusions is set out below.

#### **Issues with HGIs; recessionary trends & suppressed build rates**

- 3.5 DfI published 2016 based Housing Growth Indicators (HGIs) in September 2019. The HGI for Lisburn & Castlereagh was increased from 9,600 to 10,700. The publication also provided a useful reminder of the purpose and value of HGIs. The following statements in the Chief Planner's covering letter are important:

- *HGIs do not forecast exactly what will happen in the future.*



- They are policy neutral estimates based on recent trends and best available data on households and housing stock.
- They assume that recent trends will continue into the future.
- They do not attempt to...predict the impact that....changing economic circumstances or other future events may have on housing requirements.
- For these reasons those preparing LDPs should not regard the HGIs as a cap on housing or a target to be met.
- Notwithstanding the above, as the HGIs are based on best available data, they are therefore an important starting point to guide the assessment of the overall housing requirement identified in the LDP.
- The SPSS identifies a range of other further considerations that, in addition to the HGI, should also inform this housing allocation.
- These include the RDS Housing Evaluation Framework; allowance for existing commitments; urban capacity studies; allowance for windfall housing; application of a sequential approach to site identification; Housing Needs Assessment/Housing Market Analysis and transport assessments.

#### **HGIs as Policy Neutral**

- 3.6 The HGIs as 'policy neutral' is a particularly important point to consider. If, as the evidence discussed below would suggest, this means that the disaggregation/distribution of HGIs calculated at regional level, to Council level has not had regard to policy such as the RDS' regional spatial strategy and is simply a projection of population and household trends which the RDS direction has yet to properly influence, this must reduce extent to which the Council should take account of it.
- 3.7 The table below compares the 2012 based HGIs to the recently published 2016 based HGIs, with the difference identified in the final column. It is clearly evident that Belfast's HGI has been significantly reduced by the refresh exercise undertaken by DfI (-46%), as has fellow Belfast Metropolitan Area (BMA) Councils Antrim & Newtownabbey (-42%) and Ards & North Down (-23%). The HGI for other Councils such as ABC has been significantly increased (+19%). These changes are at odds with the RDS policy objective of strengthening Belfast as the regional economic driver within a framework of balanced regional growth.

**Table 3.1: HGI Analysis**

Council	2012 HGI	2016 HGI	+/-	% Change
A&N	7200	4200	-3000	-42
A&ND	7100	5500	-1600	-23
ABC	14400	17200	2800	19
Belfast	13700	7400	-6300	-46

CCG	6700	5600	-1100	-16
DCS	5000	4100	-900	-18
FO	4500	4300	-200	-4
LC	9600	10700	1100	11
MEA	5400	5400	0	0
MU	9500	10300	800	8
NMD	10900	10000	-900	-8
	94000	84700	-9300	-10

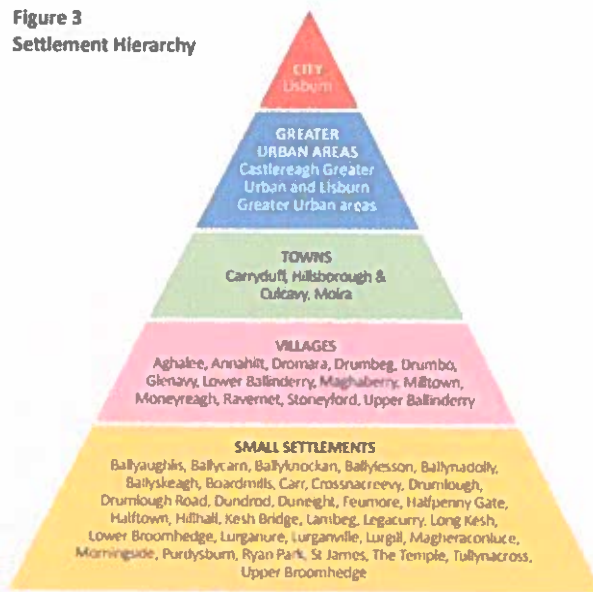
Sources: 2012 & 2016 Based HGIs

- 3.8 The fact that this change to HGIs has been made without consultation must make them difficult for local Councils to handle in the context of Plan-making. When the lineage of HGIs is reviewed it can be seen that they were subject to public consultation and independent examination in 1999 and 2005/6 (five year review) and consultation in 2011 (ten year review), however, there has been no public consultation or associated independent examination since then. If, as is suggested by the simple analysis set out here, the refreshed HGIs mark a shift away from RDS policy objectives they should be subject to consultation and independent examination.
- 3.9 As it stands, these figures have been produced with no public or stakeholder scrutiny whatsoever.
- 3.10 We welcome the fact that, unlike other Councils, LCCC has commissioned independent analysis of the HGI to test the asserted position of HGIs as 'best available evidence'. We can see that the Lichfields Growth Study has been used to establish an updated 2016-based number which has not been used as a ceiling, target or cap. Whilst this will be an important consideration in determining the final strategic housing allocation, we have concerns about the approach taken by the dPS to arrive at a final distributed housing allocation.

### **Settlement Hierarchy**

- 3.11 The allocation of growth to different levels in the settlement hierarchy and to particular settlements is important to achieving Plan Objective A: a Quality Place – enabling sustainable communities and delivery of new homes.

3.12 The Council’s proposed settlement hierarchy is shown in Figure 3 below;



3.13 Within this, Drumbo retains its status as a Village. Villages account for 12% of the Council areas overall population and whilst there is an emphasis on directing growth towards larger settlements, it is important to ensure smaller settlements and their services are sustained.

3.14 Position Paper 2 ‘Housing and Settlements’ recognises this and states that Villages are *‘important local service centres, provide goods, services and facilities to meet the daily needs of the rural area. They are good locations for rural businesses and can accommodate residential development in the form of small housing estates, housing groups and individual dwellings.’*

3.15 Page 52 of the dPS acknowledges the importance of rural areas and states *‘of equal importance is the Council’s rural hinterland in which approximately a third of the population resides. The villages and small settlements have a unique part to play in sustaining vibrancy, creating sense of place, and providing education and local services.’*

### Housing Allocation

3.16 The analysis set out below clearly shows the extent to which the critical mass and growth capacity of some settlements/parts of the plan area are under provided for in the housing allocation:

**Table 3.2: Analysis of SHA/Population Share**

	SHA Over Plan Period	%	Population	%
Lisburn City (including WLB)	6553	47.5	45410	31.8

Lisburn Greater Urban Area	406	2.9	4948	3.5
Castlereagh Greater Urban Area	2022	14.7	30717	21.5
<b>Metropolitan</b>	8981	65.2	81075	56.8
Carryduff	1612	11.7	6947	4.9
Hillsborough & Culcavy	512	3.7	3953	2.8
Moira	717	5.2	4584	3.2
<b>Towns</b>	2841	20.6	15484	10.9
<b>Villages &amp; Small Settlements</b>	1231	8.9	17496	12.3
Countryside	729	5.3	28585	20.0
<b>Rural</b>	1960	14.2	46081	32.3
<b>TOTAL</b>	13782	100.0	142640	100.0

- 3.17 The focus of growth in Lisburn City is welcome and reflects the direction of the RDS. However, we consider that additional housing is required elsewhere in the City Council area – particularly in the rural area – to achieve a better balance of planned development across the Council area and to ensure villages and smaller settlements and their services are sustained.

#### **The Importance of Sustaining Rural Settlements**

- 3.18 Alongside its important metropolitan centres of population, Lisburn & Castlereagh has a relatively large number of rural settlements which provide important service centres for its geographically and demographically significant rural area.
- 3.19 Plan Objective A4 seeks to support towns, villages and small settlements as vibrant and attractive centres providing homes and services appropriate to their role in the settlement hierarchy whilst protecting their identity from excessive development. This objective is consistent with the RDS' SFG13 which seeks to sustain rural communities.
- 3.20 It is acknowledged that it is important to guard against unsustainable development where settlements might be allowed to grow beyond their capacity, particularly where this would result in increased car-based travel to access services and physical sprawl beyond logical and defensible environmental limits that would impact upon urban form and compactness. The balance to be struck in a largely attractive and growing Council area is planning for a level of growth which is consistent with the role and function of a settlement with reference to the settlement hierarchy which will support and sustain services without resulting in these negative outcomes of excessive development.
- 3.21 Within this overall framework, to allow the Plan objectives to be met and, as the RDS (RG8, para 3.21) requires, achieve a complementary urban/rural balance, it is judged appropriate to effect an increase in the housing allocation for rural settlements.

- 3.22 These rural settlements provide important services for local communities and there is a need to ensure these are sustained and protected by allocating additional housing to increase their share of the overall housing allocation.
- 3.23 Despite the relatively large number of villages and small settlements, and the size of the rural population, their overall share of the housing allocation is quite low (<9%). The evidence<sup>1</sup> in Lisburn & Castlereagh would suggest that the consequences of not sustaining centres is a withdrawal of public services, be they educational, community or transport and that this is more likely to be experienced at the village/small settlement level of the settlement hierarchy. It is, therefore, important to assess whether to meet the needs of the rural community, there should also be an increase in the allocation to villages and small settlements following a critical review the potential of some of these settlements to accommodate a proportionate share of additional housing. The Settlement Appraisals in the Countryside Assessment in Technical Supplement 6, which are summarised in Table 3.3 below, have identified the potential for growth in certain settlements, including lands which could be rezoned from employment/mixed use<sup>2</sup> and non-excessive settlement limit expansions. The critical review may identify other villages where modest and proportionately scaled additions may be required to protect existing services by attracting new families.
- 3.24 At small settlement level there may be specific justifications for further limited growth which could allow for consolidation of built form without affecting the balance between different levels in the settlement hierarchy. A measure of growth at this lowest level of the settlement hierarchy would also be more sustainable than development in the open countryside. Whilst it is acknowledged that the latter is permissible in regional policy, Table 11 of Technical Supplement 1: Housing Growth Study confirms that at 810 the estimated level of growth in the open countryside is around two and a half times the planned level of growth of 324 in small settlements, indeed it is broadly comparable to the total village allocation (1,044). In effect the draft Plan Strategy outlines a scenario where a house is built in the open countryside for every two houses built in villages and small settlements.

**Table 3.3: Settlement Appraisal**

Village	2015 Population	Resource	Env Capacity	Transport	Ec Dev	Character	Comm Services	Equity	Dev Const	Remaining Housing Units
M'berry	2468	M	M	M	M	H	M	L	M	70
Glenavy	1791	H	L	M	M	M	H	M	M	269
Milltown	1499	L	H	M	L	H	M	M	H	89
M'reagh	1379	M	H	M	M	H	M	M	H	115
Annahilt	1045	L	M	M	L	H	L	M	M	136

<sup>1</sup> Primary schools have been closed in Crossnacreevy (2002), Drumbeg (2007), Drumbo (2007) and Hillhall (2007) in the relatively recent past. See School Analysis in Appendix 2.

<sup>2</sup> eg. Dromara & Glenavy

Dromara	1006	M	H	M	L	M	M	M	M	99
L B'derry	912	L	H	M	M	H	M	M	H	72
Aghalee	863	M	M	M	L	H	M	L	M	44
Drumbeg	813	L	H	M	L	M	L	M	M	21
Ravernet	564	L	H	M	M	H	L	L	H	19
St'ford	605	L	H	M	M	H	L	M	H	80
Drumbo	375	L	H	L	L	H	M	L	M	8 <sup>3</sup>
U B'derry	226	L	H	M	M	H	L	M	H	22

*Analysis of Countryside Assessment Settlement Appraisal Information*

3.25 Technical Supplement 6: Countryside Assessment provides limited information on the methodology associated with the Settlement Appraisals at Appendix 2.0. The individual settlement appraisals provide a commentary against the RDS tests and a judgement against each using a High/Medium/Low classification. Further judgement is required on the relative importance of each of the individual tests in the context of the particular settlement and its role. The extent of the evaluative judgement involved is evident when the classifications are compared to the equivalent exercise undertaken by the Department for BMAP.<sup>4</sup> Set side by side there are significant differences. For example, on the important Environmental Capacity Test, the Council rate Milltown and Stoneyford as High, whereas the Department rated them as Low. Tests should not carry equal weight and there is overlap between certain tests and strong relationships between others, so these classifications should not be aggregated or used as a scoring system.

3.26 A targeted approach is necessary which considers the potential of individual settlements in the round, having regard to their scale (critical mass), location (within the Plan Area and in relation to other settlements), role (resources/services; individually and in a cluster of settlements), connectivity (transport) and environmental capacity (opportunities/constraints; urban form). This is essentially an overarching judgement about place, sustainable development and delivery of new homes – Plan Objective A. In considering these factors one would expect to find higher growth potential in the larger villages which have a clear service centre role, reasonable connectivity and the potential to accommodate modest growth in a compact way without harm to interests of acknowledged importance. At the other end of the spectrum one would expect to find lower levels of planned growth where large villages have already experienced significant growth beyond their natural limits and additional expansion would potentially risk undermining the settlement hierarchy or where services have been reduced and the settlement's role has diminished.

<sup>3</sup> On review of the Housing Monitor data, the last available site has now been completed and therefore there is no further land available within the settlement limit of Drumbo.

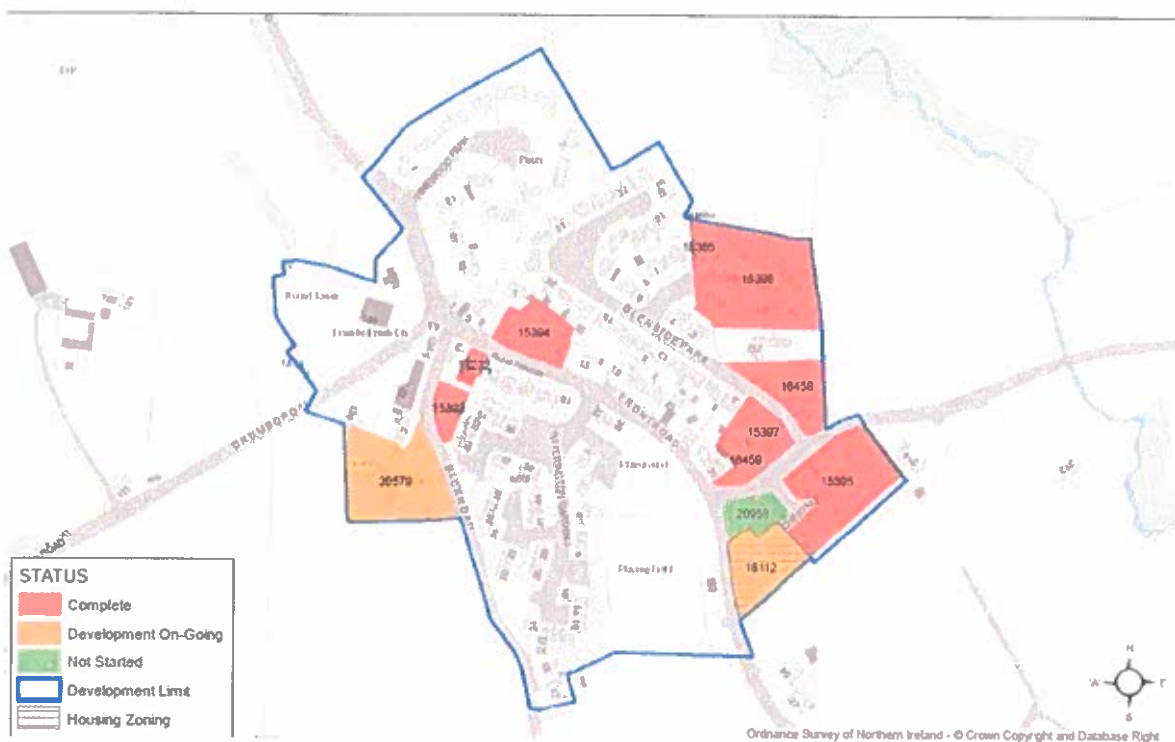
<sup>4</sup> Table 7: Revised Broad Evaluation Framework for the Metropolitan Rural Area on p34 of The Departmental Approach to the Distribution of Housing Growth Potential in the Belfast Metropolitan Area and Belfast Metropolitan Area Hinterland, June 2007

- 3.27 Reviewing the plan villages, this would suggest that villages such as Glenavy, Moneyreagh, Dromara and Aghalee have greater potential for larger but still village scale growth. However, smaller villages like of Drumbeg, **Drumbo** and Upper Ballinderry should also be allocated a lower level of additional homes to support renewal and help sustain remaining services.
- 3.28 As noted in the Settlement Appraisals, there are potential opportunities for non-excessive, sustaining/consolidating growth in the villages which could be achieved by reviewing existing land use zonings or taking opportunities to bring development to defensible limits.
- 3.29 That these proposed adjustments should result in an increased SHA is not unacceptable since the HGI, or the Council's proxy for it is not a ceiling or target and is only one factor in arriving at an overall allocation.

**Housing Monitor**

- 3.30 The latest Housing Monitor sets out the availability of land in Drumbo (2016/17) and this is shown below;

Drumbo Housing Monitor 31 March 2017



- 3.31 It should be noted that the green site has now been developed and therefore there is no land currently available in the Village.
- 3.32 If Drumbo was afforded a percentage of the overall allocation which was proportionate to its population (0.33% of the proposed allocation of 13,782), this would equate to around 50 units. Even if this was to be reduced to take account of the settlement

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evaluation and other strategic considerations, an allocation of half this would be considered reasonable.



## 4. Further Growth in Drumbo

- 4.1 As noted in Chapter 3, there is no land currently available in the Village to accommodate the growth required by Drumbo. The village should be allocated additional homes to support renewal and help sustain remaining services.
- 4.2 The subject lands in ownership of our client (Appendix 1) are clearly an appropriate location for further proportionate growth in Drumbo and can assist in sustaining the rural community and its services.
- 4.3 Drumbo is located close to both Lisburn and Belfast and provides services to its population of 375 people, including a local church and church hall, orange hall and local playing fields.
- 4.4 As highlighted in Chapter 3 and Appendix 2, Drumbo has already suffered the loss of Drumbo Primary School which closed in 2007.
- 4.5 An area of the subject lands have planning permission for two large dwellings (planning ref. LA05/2016/0627/F) and clearly the principle of development at this location (outside the settlement limit) is considered acceptable by the Council.
- 4.6 Further planning applications were submitted on the site (ref. LA05/2018/0903/O & LA04/2018/0899/O) for a total of 27 residential units on the site.
- 4.7 These planning applications received a high number of letters of support, which made clear the local communities' desire to see further housing growth in Drumbo.
- 4.8 The viewpoints expressed by these letters are summarised below;
  - Need for more housing in Drumbo – the housing need is real, young adults who have grown up in the village currently have no option but to locate to other settlements;
  - More families coming to the village would be a social benefit;
  - The infrastructure for further housing development is already in place, i.e. roads, community hall, church; and
  - The village is in need of revitalisation, since the local shop and primary school has closed, the proposed development may aid its resurrection and see the reintroduction of more local businesses and services.

## 5. Summary & Conclusions

- 5.1 Our client welcomes the opportunity to join the debate about the future development of the Council area.
- 5.2 It is important that additional homes are provided for in villages and smaller settlements to support renewal and help sustain remaining services.
- 5.3 Taking account of the need to extend the Plan Period to 2035 to meet guidance and get best value from the LDP process, it is important that when reviewing the effectiveness and delivery of its housing land supply, the potential of smaller sites which can be brought forward quickly is also recognised by the Council.
- 5.4 There is an opportunity to extend the settlement limit of Drumbo by including our client's lands for housing development which is of an appropriate proportion to its village status.
- 5.5 We respectfully request the Council consider the contents of this submission in respect of rural housing allocation and would be happy to discuss any aspects further.

**Appendix 1: Subject Lands (extent of land ownership)**



## Appendix 2: Primary School Analysis

**Table 5.1: Lisburn School Enrolments**

School	95/96	96/97	97/98	98/99	99/00	00/01	01/02	02/03	15/16	16/17	17/18	18/19	Comment	Village/Small Settlement (Y/N)
Anahilt Primary School, Hillsborough	277	273	266	276	277	285	273	259	123	141	135	152	Enrolment -45.1%	Y
Ballinderry Primary School, Lower Ballinderry									204	226	251	251	Enrolment +23.0%	Y
Ballycarrickmaddy Primary School, Stonyford	122	127	126	133	150	148	152	165	178	180	189	186	Enrolment +52.5%	Y
Ballymacash Primary School, Lisburn	237	259	280	292	290	292	298	320	373	383	388	395	Enrolment +66.7%	N
Ballymacrickett Primary School, Glenavy	186	200	219	232	224	245	239	266	355	366	374	380	Enrolment +104.3%	Y
Ballymacward Primary School, Stonyford	97	112	114	95	101	102	107	110	64	66	70	80	Enrolment -17.5%	Y
Brooklands Primary School, Dundonald									473	478	482	504	Enrolment +6.6%	N
Brownlee Primary School, Lisburn	112	120	103	100	94	104	106	114	200	200	200	205	Enrolment +83.0%	N

School	95/96	96/97	97/98	98/99	99/00	00/01	01/02	02/03	15/16	16/17	17/18	18/19	Comment	Village/Small Settlement (Y/N)
Cairnshill Primary School, Cairnshill									476	492	548	545	Enrolment +14.5%	N
Carr Primary School, Carr	98	97	100	102	115	108	112	100	57	57	65	71	Enrolment -27.6%	Y
Charley Memorial Primary School, Drumbeg	69	68	65	57	49	37	37	34					Closed 2007	Y
Carryduff Primary School, Carryduff									193	203	193	191	Enrolment - 1.0%	N
Derrigahy Primary School, Milltown	106	91	86	79	82	76	63	58					Closed 2011	Y
Downshire Primary School, Hillsborough									595	598	600	598	Merged school – Enrolment +0.5%	Y
Dromara Primary School, Dromara	111	118	116	115	125	121	120	123	180	181	177	167	Enrolment +50.5%	Y
Drumbo Primary School, Drumbo	81	68	58	42	36	30	22	24					Closed 2007	Y
Dundonald Primary School, Dundonald									773	798	788	798	Enrolment +3.2%	N
Fort Hill Integrated Primary School, Lisburn	250	229	240	227	227	207	211	205	208	205	206	208	Enrolment -16.8%	N
Friend's School, Lisburn									166	160	153	164	Enrolment -1.2%	N
Harmony Hill Primary	728	712	710	707	698	668	654	642	581	582	603	614	Enrolment -15.7%	N

School	95/96	96/97	97/98	98/99	99/00	00/01	01/02	02/03	15/16	16/17	17/18	18/19	Comment	Village/Small Settlement (Y/N)
<b>School, Lisburn</b>														
Hilden Integrated Primary School, Lisburn	0	0	0	0	62	73	65	68					Closed 2008	N
Hillhall Primary School, Hillhall	51	47	50	51	53	56	53	49					Closed 2007	Y
Hillsborough Primary School, Hillsborough	332	353	348	356	368	378	371	385					Closed 2005 & merged to become Downshire PS	Y
Killowen Primary School, Lisburn	467	482	475	471	447	403	396	356	399	413	420	402	Enrolment -13.9%	N
Knockmore Primary School, Lisburn	152	155	144	150	173	171	212	167	174	192	188	230	Enrolment +51.3%	N
Lambeg Primary School, Lambeg	65	63	60	55	50	43	50	44					Closed 2007	Y
Largymore Primary School, Hillhall	343	339	337	309	280	253	227	212	168	176	189	192	Enrolment -44.0%	Y
Lisburn Central Primary School, Lisburn	228	232	238	260	255	259	251	253	187	194	191	189	Enrolment -17.1%	N
Maghaberry Primary School, Moira	199	204	204	212	216	214	223	218	214	223	238	245	Enrolment +23.1%	N
Maze Primary School, Long Kesh	85	89	89	90	93	91	91	87					Closed 2003	Y
McKinney Primary School,	75	83	90	97	107	101	106	112	130	128	126	127	Enrolment +69.4%	Y

School	95/96	96/97	97/98	98/99	99/00	00/01	01/02	02/03	15/16	16/17	17/18	18/19	Comment	Village/Small Settlement (Y/N)
<b>Dundrad</b>														
Meadow Bridge Primary School, Hillsborough									292	289	306	304	Enrolment +4.1%	Y
Moira Primary School, Moira	286	282	275	287	312	326	338	367	388	380	375	371	Enrolment +29.7%	N
Moneyrea Primary School, Moneyreagh									210	209	212	209	Enrolment -0.5%	Y
Newport Primary School, Hillsborough	100	90	81	74	72	74	61	58					Closed 2005	Y
Old Warren Primary School, Lisburn	178	173	146	133	143	137	131	126	115	133	130	135	Enrolment -24.2%	N
Pond Park Primary School, Lisburn	580	595	588	600	594	601	601	591	623	621	620	625	Enrolment +7.8%	N
Riverdale Primary School, Legacurry	0	0	0	0	0	167	177	183	208	206	208	208	Enrolment +19.7%	Y
Rowandale Integrated Primary School, Moira									216	243	256	265	Enrolment +22.7%	N
St Aloysius Primary School, Lisburn	322	325	319	302	302	303	293	273	401	418	443	444	Enrolment +37.9%	N
St Colman's Primary School, Lisburn									392	395	397	391	Enrolment -0.3%	N
St Colman's Primary School,	403	435	419	426	444	438	412	360					Enrolment -10.7%	Y

School	95/96	96/97	97/98	98/99	99/00	00/01	01/02	02/03	15/16	16/17	17/18	18/19	Comment	Village/Small Settlement (Y/N)
<b>Lambeg</b>														
St Colman's Primary School, Moira	80	72	70	61	53	45	39	30					Enrolment -62.5%	N
St James' Primary School, Kilwarlin	72	87	93	105	112	116	120	123					Closed 2003	Y
St John's Primary School, Hillsborough	36	37	43	45	42	43	41	43					Closed 2003	Y
St Joseph's Primary School, Lisburn	300	265	251	231	204	181	189	177	388	385	378	386	Enrolment +28.7%	N
St Joseph's Primary School, Carryduff									411	423	430	456	Enrolment +10.9%	N
Tonagh Primary School, Lisburn	207	192	194	184	180	177	174	165	229	214	213	214	Enrolment +3.4%	N
Wallace High School, Lisburn									119	126	126	121	Enrolment +1.7%	N

Sources: Education Authority Annual Area Profiles Report November 2019 & Draft BMAP 2015 Technical Supplement 10 'Education, Health, Community and Cultural Facilities'



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