

Local Development Plan 2032 Consultation Survey

Section A- Data Protection And Consent

Q1. DATA PROTECTION AND CONSENT

I confirm that I have read and understand the Privacy Notice above and I give my consent for Lisburn & Castlereagh City Council to hold my personal data for the purposes outlined. (Required)

Section B- Your Details

Q2. Please specify the capacity in which you are responding by ticking one of the following boxes.If you are responding as a planning consultant, agent or representing an organisation you will be the main point of contact for your client or organisation

Planning Consultant/ Agent

Q3. Your Details

Name

Details of Organisation/ Body One2One Planning

Address 1 Larkfield Avenue

Postcode BT10 0LY

Email Address

Phone Number

Consent to Publish Response

Q4. Under planning legislation we are required to publish responses received in response to the Plan Strategy, however you may opt to have your response published anonymously should you wish.Even if you opt for your representation to be published anonymously, we still have a legal duty to share your contact details with the Department for Infrastructure and the Independent Examiner appointed to oversee the examination in public into the soundness of the Plan Strategy. This will be done in accordance with the Privacy Notice detailed in Section A.

Please publish with my name and organisation

Section C: Your Representation

Q5. Please set out your comments in full. This will help the Independent Examiner understand the issues you raise. You will only be permitted to submit further additional information to the Independent Examiner if the Independent Examiner invites you to do so.

I believe it to be UNSOUND

Q6. If you have any additional information to upload in order to explain your SOUND views please do so

No Response

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

Q7. PLEASE SELECT ONLY ONE ISSUE IN EITHER PART 1 (CHAPTER 1 TO 5) OR PART 2 (OPERATIONAL POLICY)

Chapter 4A- Enabling Sustainable Communities and Delivery of New Homes

Policy Reference

Strategic Policy 08 - Housing In Settlements - In particular Table 3 referred to - Housing Allocation Page 64

Soundness Test No:

Q8. Please identify which test(s) of soundness your representation relates to, having regard to Development Plan Practice Note 6 (available on the Planning Portal website at https://www.planningni.gov.uk/index/s/development_plan_practice_note_06_soundness_version_2_may_2017_.pdf)

C1 Did the council take account of the Regional Development Strategy?

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

CE4 Is the Plan reasonably flexible to enable it to deal with changing circumstances?

Details

Please give details of why you consider the Plan Strategy to be UNSOUND having regard to the test(s) you have identified above. Please be as precise as possible. If additional space is required please upload by clicking below.

See attached sheet - Policy SP8 and Housing Allocation Table 3

MODIFICATIONS

Q9. If you consider the Plan Strategy to be UNSOUND, please provide details of what changes you consider necessary to make the Plan Strategy SOUND. Please be as precise as possible. If additional space is required please upload your information by clicking below.

See attached sheet

Q10. If you have additional information to upload please do so here

- File: Representation L& CCC Stevens Hillsborough Jan 2020.pdf

Q11. If you wish to submit further information please click below:

I wish to submit a further representation

PLAN COMPONENT

Q12. PLEASE SELECT ONLY ONE ISSUE IN EITHER PART 1 (CHAPTER 1 TO 5) OR PART 2 (OPERATIONAL POLICY)

PART 2- Operational Policies (please specify policy reference below)

Policy Reference

TOU 3 - Proposals for Tourist Accommodation in the Countryside

Soundness Test No:

Q13. Please identify which test(s) of soundness your representation relates to, having regard to Development Plan Practice Note 6 (available on the Planning Portal website at https://www.planningni.gov.uk/index/s/development_plan_practice_note_06_soundness__version_2__may_2017_.pdf)

CE3 Are there clear mechanisms for implementation and monitoring?

CE4 Is the Plan reasonably flexible to enable it to deal with changing circumstances?

Details

Please give details of why you consider the Plan Strategy to be UNSOUND having regard to the test(s) you have identified above. Please be as precise as possible. If additional space is required please upload by clicking below.

See attached detail

MODIFICATIONS

Q14. If you consider the Plan Strategy to be UNSOUND, please provide details of what changes you consider necessary to make the Plan Strategy SOUND. Please be as precise as possible. If additional space is required please upload by clicking below.

See attached sheet.

Q15. If you have additional information to upload please do so here

No Response

Q16. If you wish to submit further information please click below:

Representation Complete

PLAN COMPONENT

Q17. PLEASE SELECT ONLY ONE ISSUE IN EITHER PART 1 (CHAPTER 1 TO 5) OR PART 2 (OPERATIONAL POLICY)

No Response

Soundness Test No:

Q18. Please identify which test(s) of soundness your representation relates to, having regard to Development Plan Practice Note 6 (available on the Planning Portal website at https://www.planningni.gov.uk/index/s/development_plan_practice_note_06_soundness_version_2_may_2017_.pdf)

No Response

Details

Please give details of why you consider the Plan Strategy to be UNSOUND having regard to the test(s) you have identified above. Please be as precise as possible. If additional space is required please upload by clicking below.

No Response

Modifications

Q19. If you consider the Plan Strategy to be UNSOUND, please provide details of what changes you consider necessary to make the Plan Strategy SOUND. Please be as precise as possible. If additional space is required please upload by clicking below.

No Response

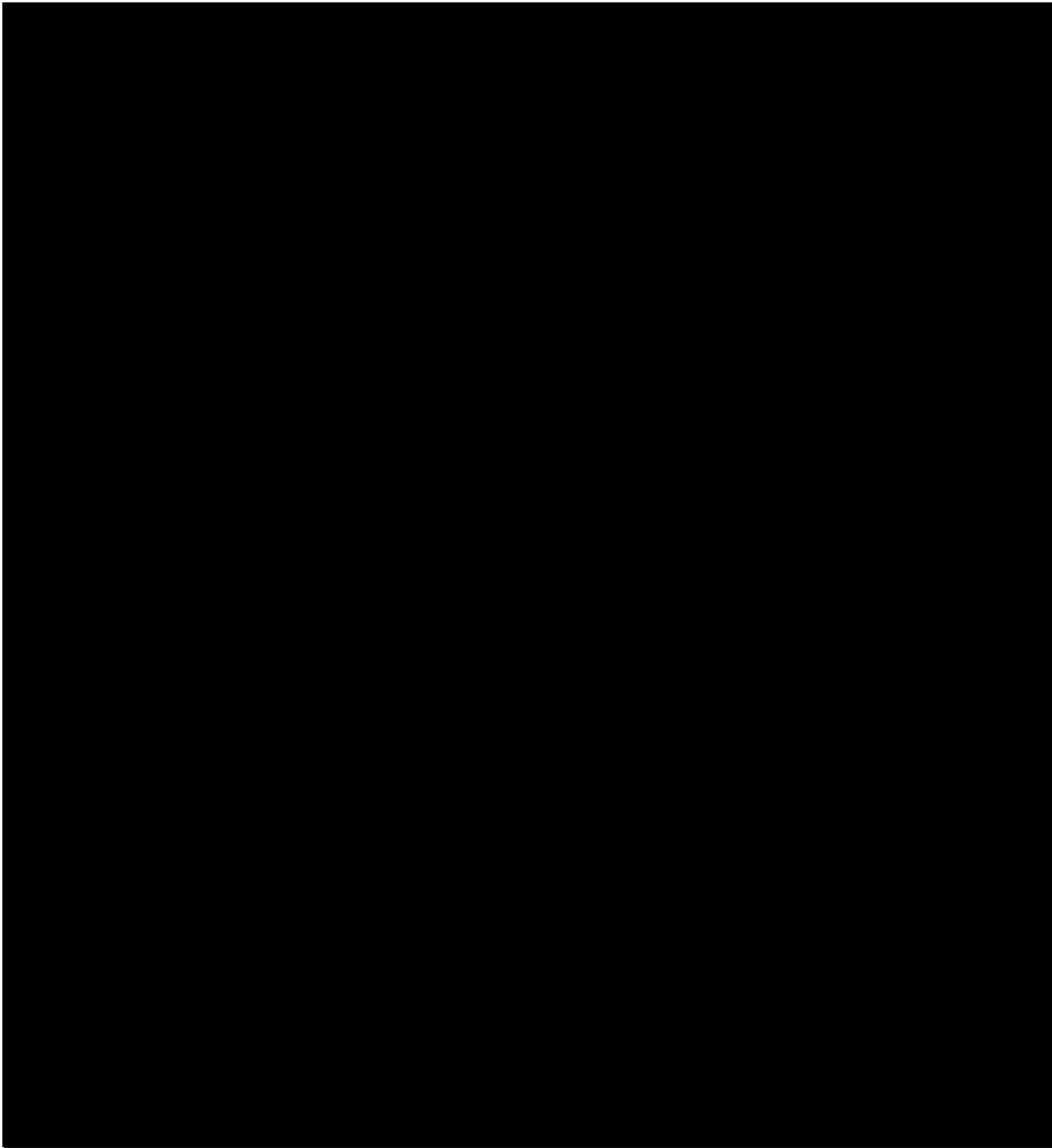
Q20. If you wish to submit further representations you will need to complete a new questionnaire

No Response

SECTION C: DEALING WITH YOUR REPRESENTATION

Q21. INDEPENDENT EXAMINATION Please indicate how you would like your representation to be dealt with. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Written Representation



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10th January 2020

Plan Manager
Lisburn and Castlereagh Area Plan Team

Re: Publication of Draft Plan Strategy for Lisburn & Castlereagh LDP

The submission is submitted by [REDACTED] and considers the policies within the DPS, having regard to the necessary soundness tests referenced in DPPN 6. Our client has a particular interest in the Spatial Strategy and Strategic Policy 08 Housing in Settlements (Part 1 - page 57) and in particular the Housing Allocation referred to within that policy as set out at Table 3 (Part 1 - page 64). He is specifically concerned in respect of the allocation for Hillsborough and we draw your attention to specific lands identified as being suitable for inclusion within the settlement development limit for that town.

Support

Our client welcomes the Plan Vision A – A Quality Place¹ In particular, the references to:

- 1.Supporting the existing settlement hierarchy, recognizing Lisburn and Castlereagh as a growth area consistent with the RDS and reflective of its strategic location
- 2. Encouraging the creation of accessible and connected places to sustain communities with good access to jobs, housing, public transport, education, community and recreation facilities
- 4. Support towns, villages and small settlements in the Council area as vibrant and attractive centers providing homes and services appropriate to their role in the settlement hierarchy whilst protecting their identity from excessive development
- 5. Provide appropriate opportunities for housing in settlements with a range of types and tenures, including affordable housing

¹ Page 34 of Part 1- Plan Strategy

- 6. Encourage good design and positive place-making in all development appropriate to its locality and context

The designation of Hillsborough as a town within the settlement hierarchy is also welcomed (Part 1, Plan Strategy - Page 49 Settlement Hierarchy Table 1).

The Housing Allocation

Chapter 4 on 'Meeting Future Housing Need²' sets out the detail of the housing allocation. While the 2012 HGI shows 9600 units to 2025, this required updating to the full plan period of 2032, with updates also necessary for recent data sources and was increased to 11,550 units³. The most recent DFI HGI figures of Sept 2019⁴ updated the base figure to 10,700, an increase of 200 units which was not considered significant. The extract below at Figure 1, shows the balance of existing lands across the settlement tiers with 14.2% of the Boroughs housing potential allocated to West Lisburn. Hillsborough as an existing town is allocated 4.9% of the housing potential. On further investigation it appears that of the allocated 512 units 468 are on ongoing sites⁵.

Table 3 Strategic Housing Allocation over Plan Period

Settlement	Potential Units Remaining	Potential Units on Urban Capacity Sites	Windsill Potential 1-4 Units Projected over 12 year period	Windsill Potential 5+ Units Projected over 12 year period	Total Potential
Lisburn City	4,079 (38.8%)	607 (5.8%)	97 (2%)	420 (4%)	5,203 (49.6%)
Lisburn Greater Urban Area	188 (1.8%)	0	2 (0.01%)	236 (2%)	406 (3.8%)
Castlereagh Greater Urban Area	1,628 (15.5%)	101 (1%)	43 (0.4%)	248 (2.4%)	2,020 (19.3%)
Carryduff	1,407 (13.4%)	119 (1.1%)	10 (0.09%)	76 (0.8%)	1,612 (15.4%)
Hillsborough & Duffry	421 (4%)	25 (0.2%)	27 (0.2%)	44 (0.4%)	512 (4.9%)
Altona	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 Allotment site West Lisburn/Blairstown	1,350 (12.9%)				1,350 (12.9%)
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

Figure 1: Extract from LDP Part 1 – Plan Strategy – Page 64 – Chapter 4 Table 3

² Part 1 Plan Strategy Chapter 4 Page 62

³ Technical Supplement 1 - Housing Growth Study Para 4.8 details how it updated the 2012 based HGI through the use of 2016-based household projections and adjustments set out within the 2012 HGI methodology. It identified a new baseline future growth of 10,380 households over the Plan period (692 dwellings per annum). This was rounded up to 700 dwellings per annum equating to 10,500 dwellings for the plan period. A 10% oversupply allowance was added for potential that might not come forward bringing the total to 11,550

⁴ Updated based on data for three components, namely updated NISRA Household Projections, new Household Condition Survey data published by NIHE and more recent data from NISRA Central Survey Unit (as detailed in Housing Output Study TS 1 para 4.11)

⁵ Table 6 Housing Allocation 2017-2032 Plan Period – Housing Output Study TS 1 Para 4.19

The Housing Output Study (Technical Supplement 1) provides the detail behind these calculations and the breakdown across the Council area. The hierarchy sets Hillsborough as a town in the same manner of Carryduff yet the table⁶ shows that Carryduff has a much more ample supply with 82.3 years' worth of available land. This compares to 19.5 years for Hillsborough. This imbalance fails to provide local residents with a sustainable choice across the town's tier of the hierarchy.

Table 9.1 Housing land supply as of 31 March 2017

	Past trends		Supply				No. years supply
	Average past delivery	Future Distribution of growth based on past trends	Potential units		Total		
			Undeveloped sites	Ongoing sites	No.	% of L&C	
Lisburn, incl West Lisburn	54.5%	377	1,569	4,673	6,242	48.5%	16.6
Castlereagh, incl Dundonald	16.3%	113	360	1,449	1,809	14.1%	16.0
Carryduff	2.8%	19	410	1,154	1,564	12.2%	82.3
Hillsborough and Calcavy	3.4%	24	0	468	468	3.6%	19.5
Moira	3.7%	26	269	337	606	4.7%	25.3
Other settlements and countryside	19.2%	133			2,178	16.9%	16.4
Total	100%	692			12,867	100%	18.6

Note that breakdown of ongoing sites and undeveloped sites in villages and small settlement/countryside is not available.

Source: LCCC

Figure 2: Extract from Housing Growth Technical Supplement 1- Para 9.12

1350 housing units are being reserved for the West Lisburn expansion site and while there is no objection to the inclusion of housing at West Lisburn, it is unsustainable to prevent the expansion of other towns due to the reservation of such a significant capacity for this area. This proposal will take many years to be delivered due to the need for the substantial contributions for open space and linear park and for the engineering works associated with the new link road.

The Housing Output Study identified that:

This level of supply (referring to the 10,500 units figure) is dependent on the West Lisburn strategic site coming forward (supported by the West Lisburn Development Framework) to ensure the long term supply and the need for investment in the transport infrastructure to secure its future potential and refers to West Lisburn as 'a key area of future regeneration

⁶ Lisburn & Castlereagh: Housing Growth Study Chapter 9 Meeting Future Housing Need Page 45

and growth which is a priority for the Council for the next 20 years⁷. (Underlining my emphasis).

The urban capacity study, completed by Arup's, sets out phasing assumptions for new sites (Technical Supplement 2 -Section 3.4.1.2, Page 22). The extract (Table 3) below, assumes 3 years for sites without planning permission to come on line. Table 4 considers annual build out rates and indicates that for sites over 200 units a build out rate of 55 units per annum is considered robust. Using this analysis it would take a minimum of 3 years for works to start on the West Lisburn site and 25 years for a full build out⁸.

3.4.1.2 Phasing assumptions

For the majority of the sites, the following assumptions in relation to phasing have been made (see Table 3 and Table 4). These are based on professional judgement as well as historic lead in times and build out rates in the district. Committed housing sites currently under construction and those with current planning consents for new build housing are more likely to come forward in the short term.

Table 3: Lead-in times

Planning permission	Fewer than 50 units	50 units and above
Reserved matters / full planning permission	1 year	2 years
Sites without planning permission	2 years	3 years
Justification:		

Table 4: Build out rates (residential)

Site yield	Annual build out rate
Up to 25	10
26-50	15
51-100	20
101-200	30
Over 200	55
Justification:	
<ol style="list-style-type: none"> 1. Larger sites are likely to release more houses to the market in any given year. 2. Very large sites (over 200 units) may have more than one developer involved, further increasing build out rates 	

Figure 3_ Extract Arup Urban Capacity Study – TS 2 Section on Phasing Assumptions

Given the Council's own information would indicate that West Lisburn could be as much as a 28 year program, it is entirely unreasonable, even with flexibility built in, to expect 1350 units to be delivered in the 12 years to the end of the 2032 plan period. Accordingly, some of this potential should be reallocated to other areas to enable the housing need identified in the HGI's to be met.

⁷ Paras 5,14 and 515 of the Housing Output study – Technical Supplement 1

⁸ 1350 units divided by 55 per annum amounts to 24.5 years for full delivery

In addition, the Countryside Allocation of 729 units is significant, accounting for almost 7% of the total housing growth. It is disproportionate to the population demographic to allow for more housing in the countryside compared to a towns especially when this is a decreasing resource (and the proposed infill policy will further decrease those opportunities by requiring a greater number of properties to constitute a substantial built up frontage, with the removal of garages from the description of buildings) and appears to conflict with the objective of focusing growth in urban areas.

The RDS states that the role of the LDP is to "identify and consolidate the role and function of settlements' and refers to housing as a key driver of physical, economic and social change and emphasizes the importance of the relationship between the location of housing, jobs, facilities, services and infrastructure. As such the promotion of living in settlements rather than the open countryside ought to be reflected in the DPS.

There is a need to focus population growth close to service centres which have the capacity to provide for the critical mass needed to ensure proportionate sustainable growth. This position is supported by the Housing Output Study (TS1) which states at Para 9.16:

Development is needed across a range of settlements to ensure local needs are met and the market provides housing choice and diversity for a range of different households.

The strategic objective A (4⁹) 'Support towns, villages and small settlements in the Council area as vibrant and attractive centers providing homes and services appropriate to their role in the settlement hierarchy whilst protecting their identity from excessive development' is potentially compromised through objective (8¹⁰); by allowing disproportionate growth in the countryside, while the focus should remain in the settlements.

On this basis our client submits the allocation does not meet the tests for soundness on the basis that it fails to meet tests:

C1 – Compliance with RDS

The RDS at Page 43 recognizes the need to manage housing growth to achieve sustainable patterns of residential development under RG 8. The Spatial Framework provides guidance and priorities for development and infrastructural investment. Its guiding principle is putting the person at the centre to help understand their relationship with places. It notes that '*there needs to be an understanding of how different places are influenced by the range of services and functions required by individuals, where they are located, how*

⁹ Part 1 Chapter 3 – Plan Vision and Objectives Page 34

¹⁰ Support vibrant rural communities with appropriate opportunities for dwellings and sustainable development in the countryside.

frequently they are used and by whom'. This will determine how people live, work and access services and in exploring the role and position of a settlement it recognizes that:

- It is not appropriate to define settlements by their population alone;
- Service centres are hierarchical;
- Access to services and facilities by the critical mass is important.

The plan does not support a sustainable pattern of development, with the proportion of growth for Hillsborough inadequate to provide for the required local needs.

CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on robust evidence and CE4 Flexibility to deal with changing circumstances

As demonstrated previously the allocation is disproportionate to the Strategic Growth and Plan Vision for a Quality Place and population demographics. The Housing Allocation as referenced in Strategic Policy 08 Housing in Settlements in that the Plan will support development proposals that are in accordance with the Strategic Housing Allocation provided in Table 3 and is not supported by the evidence base within Technical Supplements 1, 2 and 6.

Remedy-The allocation needs to be adjusted to increase the amount of housing allocated to the small town of Hillsborough.

Why Hillsborough is a sustainable Settlement

Hillsborough & Culcavy (population 3953 & 1729¹¹) are located around 3.2km south of the settlement limit of Lisburn and 11.7km east of the settlement of Moira.

The RDS (Table 3.2, page 42), Housing Evaluation Framework sets out six tests to consider the distribution of future housing provision and how potential constraints on the future growth of a settlement are influential in the allocation of future development.

Physical constraints that relate to the matters set out under the Resource, Environmental Capacity and Transport Tests and would include Wastewater treatment works capacities; and Local road network capacities. Other constraints relate to the Urban and Rural Character and Community Services Tests and include considerations such as the ability of the landscape to absorb development, impact on environmental designations and the accessibility of new development to a settlement's services and facilities.

¹¹ NISRA Headcount and Household Estimates for Settlements, March 2015

Each are detailed in the Countryside Assessment (Technical Supplement 6 Settlement Appraisal) with the key indicators as follows:

- The joint settlements grew up from a market town, consisting of mainly Georgian architecture in the town centre conservation area.
- Culcavy is situated in the north-west part of the settlement, an almost totally-residential area with the exception of the Mace local shop and United Biscuits Depot, separated from Hillsborough by the A1 Protected Route. There are currently a number of industrial units just outside the existing development limit at Culcavy including an Auto Repair Centre, Lagan Valley Steels, Mulgrew Haulage and DHL parcel delivery company.
- Important tourist attractions are found at Hillsborough Castle and the historic park, tourist information office/government office, as well as numerous shops, eateries and meeting places in the town centre.
- In close proximity to the main route (M1) and (A1) from Belfast to Newry/Dublin. Well served by buses 26B, 38, 238, 325G and 538 with the nearest train station, Lisburn, is 8.9km away. A public car park (town centre) is located off Main Street.
- Constrained by the many environmental designation including listed buildings. The forest park to the south restricts development in that direction, and there is open countryside to the west and east. The A1 Protected Route restricts development.
- Undeveloped housing land still remaining in the settlement In terms of development opportunities, there is scope for new development to the north (between Lisburn Road and Carnreagh Road) and to the south-west along the Dromore Road
- In respect of sewage capacity NI Water have been consulted. Lisburn (New Holland) includes Hillsborough & Culcavy. NI Water's sewerage network capacity mapping tool has identified capacity issues in parts of the Lisburn wastewater network. The WwTWs has 10% capacity based on growth. (March 2019)

An additional allocation to Hillsborough would focus growth to service the surrounding rural area. Taking cognisance of this knowledge the settlement limit should include a modest rounding off to include sufficient lands to accommodating a low density development to provide for choice and future housing need during the plan period.

Culcavy is identified above as having growth potential and while the area to the west is located within an LLPA, the landscape character as elevated Drumlin Farmland would indicate a low density development would be appropriate, which would assist in consolidating the linear pattern of development in the area as delineated by the blue arrow while providing for the demand for family accommodation or self-catering tourist accommodation.

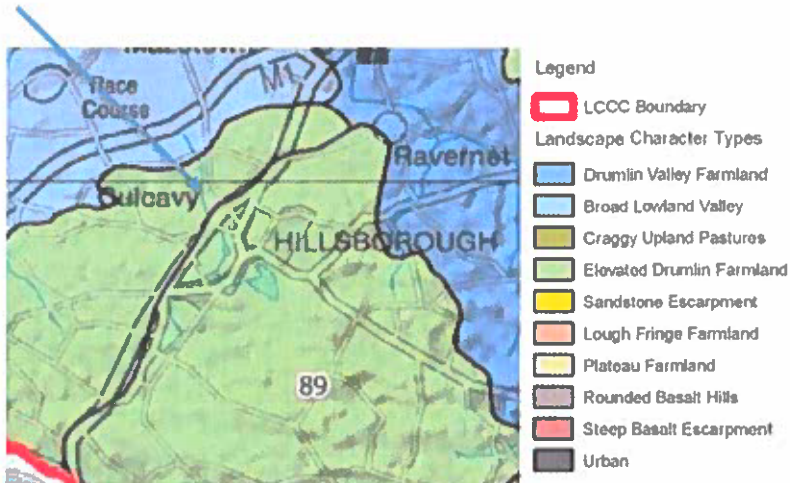


Figure 4- Extract Countryside Assessment¹² – Figure 6 Elevated Drumlin Farmland



Figure 5: Context of west of Culcavy

¹² Lisburn Landscape Character review figure 6 Landscape Character Areas – Ironside Farrar Report Technical Supplement 6

The site below provides a potential small expansion opportunity for Hillsborough for low density accommodation which will accommodate the future growth of this settlement in that;

- The lands immediately adjoin the limit, offering a logical rounding off to the SDL;
- There is a suitable means of access provided via two different access points;
- There is potential to create a landscaped buffer along the edge of the SDL fitting with the proposed low density envisaged.



Figure 6: Overview of Lands available for low density development to edge of SDL

Tourism Policy

We also consider the policy provisions for tourist accommodation in the Countryside to be unclear. Policy TOU3 - Proposals for Tourist Accommodation in the Countryside states that Planning permission will be granted for Tourist Accommodation in the following circumstances and defined criteria including:

Tourist Accommodation on the Periphery of a Settlement

A definite proposal to develop tourist accommodation on the periphery of a settlement limit will be permitted subject to all of the following criteria:

- a) must be demonstrated that there is no suitable site within the settlement or other nearby settlement
- b) there are no suitable opportunities in the locality by means of;
 - the conversion and reuse of a suitable building(s) or
 - the replacement of a suitable building(s)
- c) the development will not dominate the settlement, adversely affect landscape setting, visually integrate into the landscape, or otherwise contribute to urban sprawl

The policy refers to '*within the settlement and other nearby settlement*' with no context of how far that search to other settlements surrounding that selected should extend. It should be clear how great a distance one is expected to travel to review surrounding settlements and the policy is also vague in its reference to 'the locality'. There is no reference to what the locality relates to i.e. is it the settlement, a tourist amenity catchment, a local area identified as having a specific need.

This policy is unsound under test CE 3 in that the mechanisms for implementation and monitoring are unclear and CE4 in that the tourist policy is not reasonably flexible to enable it to deal with changing circumstances.

We would ask that the above matters are taken as a representation to the dps housing allocation and look forward to the consideration of Hillsborough and the suggested site for further low density residential growth at the next stage of the process. Policy TOU 3 also requires further detail of the terminology used to assist with its future application to proposals.

Yours Faithfully

Director