



## Local Development Plan 2032 Counter Representation Form

Please complete this counter representation form and email to [LDP@lisburncastlereagh.gov.uk](mailto:LDP@lisburncastlereagh.gov.uk) or alternatively print and post a hardcopy to:-

Local Development Plan Team  
Lisburn & Castlereagh City Council  
Lagan Valley Island  
Lisburn  
BT27 4RL

**All counter representations must be received no later than 5pm on Friday 17 April 2020.**

### SECTION A: DATA PROTECTION

In accordance with the Data Protection Act 2018, Lisburn & Castlereagh City Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure.

It should also be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure (DfI) as they will be considered as part of the Independent Examination (IE) process. For further guidance on how we hold your information please visit the privacy section at [www.lisburncastlereagh.gov.uk/information/privacy](http://www.lisburncastlereagh.gov.uk/information/privacy).

Counter representations will be treated in accordance with the **LDP privacy notice** which is available to view at [www.lisburncastlereagh.gov.uk/LDP](http://www.lisburncastlereagh.gov.uk/LDP) or is available on request by emailing [LDP@lisburncastlereagh.gov.uk](mailto:LDP@lisburncastlereagh.gov.uk).

By proceeding and signing this representation you confirm that you have read and understand the privacy notice above and give your consent for Lisburn & Castlereagh City Council to hold your personal data for the purposes outlined.

Please note that when you make a counter representation to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the Council's website. Copies of all counter representations will also be provided to DfI and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for IE. A Programme Officer will also have access to this information during the IE stages of the Plan preparation. DfI, the Programme Officer and the Independent Examiner will, upon receipt, be responsible for the processing of your data in line with prevailing legislation. If you wish to contact the council's Data Protection Officer, please write to:

Data Protection Officer  
Lisburn & Castlereagh City Council,  
Civic Headquarters,  
Lagan Valley Island,  
Lisburn,  
BT27 4RL

or send an email to: data.protection@lisburncastlereagh.gov.uk or telephone: 028 9244 7300.

## SECTION B: YOUR DETAILS

Please tick one of the following:-

- Individual     Planning Consultant / Agent     Public Sector / Body  
 Voluntary / Community Group     Other

First Name

Clyde

Last Name

Shanks

Details of Organisation / Body

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### Consent to Publish Response

Under planning legislation we are required to publish counter representations 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 counter 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 **without** my identifying information  
 Please publish with only my Organisation  
 Please publish with my Name and Organisation

**SECTION C:**

Have you submitted a representation to the Council regarding this development plan document?

Yes  No

If yes, please provide your Reference Number **DPS-033**

**SECTION D: YOUR COUNTER REPRESENTATION**

In accordance with Regulation 18 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, any person may make a counter representation in relation to a representation seeking change to a Development Plan Document (DPD). The purpose of a counter representation is to provide an opportunity to respond to proposed changes to the DPD as a result of representations submitted under Regulation 16 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

**A counter representation must not propose any further changes to a DPD.**

Please provide the reference number of the site-specific representation to which your counter representation relates. If you wish to make a counter representation to more than one representation, please complete a separate sheet for each counter representation you wish to make.

DPS-095
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Your counter representation must relate to a site-specific representation made to the Lisburn & Castlereagh City Council draft Plan Strategy.

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the Department for Infrastructure’s Development Plan Practice Note 06 Soundness.

Please note your counter representation must not propose any new changes to the draft Plan Strategy. It should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission.

This submission is a counter representation to the content of DPS-095

The submission suggests that housing delivery at Blaris is a long term option.

The identification of strategic mixed use growth/expansion of Lisburn on lands at Blaris, West Lisburn has been long established through successive planning exercises (draft BMAP; draft BMTP; DoE endorsement of Development Framework; LCCC Development Framework 2015; LCCC POP; LCCC Development Framework 2018).

In relation to soundness this counter representation is reinforced by policy compliance and wider content contained in the attached revised supporting planning statement (October 2019) that forms part of the advanced consideration of two major planning applications relating to lands at Blaris as previously confirmed in our representation to the draft Plan strategy publication. This document provides a comprehensive evidence base addressing regional and strategic planning policy, sustainability, planning history and material considerations weighing in favour of the proposals.

These planning applications will be determined by LCCC balancing the development plan context and all other material considerations in the normal manner.

The Plan Strategy should be flexible both in terms of its Plan period and also in assessing realistic levels of housing contribution that lands at Blaris may make during that plan period. Our submission to LCCC (attached supporting statement) and to the draft Plan Strategy has confirmed that the Blaris development project would straddle across this and its successor Plan period. It sought some refinements to SMU01 to make it more sound and reflect the application proposals and previously endorsed extent of the Blaris development area.

Prior to the Coronavirus outbreak it had been our expectation that the planning applications would have been presented to LCCC planning committee with a resolution to grant subject to agreement on a s76 by summer 2020. That would have opened the prospect to M1-Knockmore link road starting in first half of 2021 and with 18-month build completed by end 2022 with first phase housing occupied in early 2023. These are not overly ambitious timeframes. They are realistic subject to relaxations on the lockdown in the short-term.

Our previous submission estimated initial year of lesser output (c.50 units) and then an upper realistic annual site completion of 80-100 units. That would deliver in the range 770-950 by 2032. Rolling forward on same basis to 2035 would see 1010-1250 units. If one looks to 2037 then the output would be 1170-1450.

We welcome the Turley submission's endorsement that the principle of strategic mixed use development at Blaris is sound reflecting its highly sustainable credentials.

Signature



Clyde Shanks

Date

15 April 2020

Thank you for your comments

# **BLARIS**

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# Lisburn

Lands at Blaris, Lisburn  
Supporting Planning Statement

October 2019



**Neptune  
Group**

**CLYDE SHANKS**  
Planning Development

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Annex 2	DOE January 2007 BMAP paper
Annex 3	DOE June 2007 BMAP paper
Annex 4	draft BMAP revised allocation plan, agreed with DoE at BMAP Inquiry
Annex 5	Meeting notes, February 2008; May 2008, Blaris Development Partnership/DOE Strategic Projects team
Annex 6	Letter of endorsement of Blaris Development Framework, Director of Strategic Planning, DoE
Annex 7	agreed Blaris Development Framework masterplan
Annex 8	LCCC West Lisburn Development Framework Zoning Plan
Annex 9	PAC dBMAP report
Annex 10	Belfast Metropolitan Transport Plan, Figure 6.11

## 1. Introduction and Background

- 1.1 This revised supporting planning statement has been prepared to explain the proposed major sustainable mixed use development planned for lands at Blaris, Lisburn and to articulate why LCCC should grant planning permission for the two planning applications that Neptune Carleton LLP has before them.
- 1.2 It sets the development proposals within the appropriate legislative decision making context and examines all relevant regional, local and strategic planning policy and the development proposals' compliance when measured against these.
- 1.3 The guiding principle for LCCC in determining these planning applications is that sustainable development should be permitted, having regard to the development plan and all other material considerations, unless the proposed development will cause demonstrable harm to interests of acknowledged importance. (Para 3.5; 5.72, Strategic Planning Policy Statement (SPPS))
- 1.4 LCCC in following strategic guidance (Para 4.19, SPPS) should take a positive approach to appropriate economic development proposals, and proactively support and enable growth generating activities. Large scale investment proposals with job creation potential should be given particular priority. LCCC should also recognise and encourage proposals that could make an important contribution to sustainable economic growth when taking decisions.
- 1.5 LCCC has the positive task of guiding appropriate developments to the right places while preventing developments that are not acceptable.
- 1.6 Two separate planning applications are presented to Lisburn and Castlereagh City Council for determination:
- An outline planning application for a proposed mixed use development to include new housing (1300 dwellings) and commercial floorspace (754,000 sq. ft.), 1.6km M1-Knockmore link road, riverside parkland and ancillary works; and
  - A full planning application for the proposed construction of a new link road (1.6km) connecting the existing M1/A101 roundabout to existing Moira/Knockmore Road junction.
- 1.7 These are major development proposals in terms of the Planning Act (Northern Ireland) 2011.
- 1.8 They have been the subject of environmental impact assessment (EIA) with the applicant having voluntarily prepared the necessary Environmental Impact statements to accompany each planning application.
- 1.9 Both have been the subject of EIA scoping shared with LCCC and its consultees. Both have also been the subject of the requisite process and procedures that must be followed for major development planning applications.
- 1.10 For both planning applications that has involved the following:
- PAN – Proposal of Application Notice; issued to LCCC on 16 May 2017 and updated with revised PAN shared on 16 August 2018 to reflect a further round of public consultation in advance of formal application submission at the end of September 2018.
  - Pre Application Community Consultation – initially undertaken on 25th and 26th September 2017 with a refresher event on 6th September 2018
  - Pre application Discussion (PAD) – draft ESs shared with LCCC and subject to consultation and feedback from consultees
- 1.11 The proposals for Blaris will deliver a sustainable lateral urban expansion of Lisburn connecting to the established western and south western city limits at Knockmore/Lissue and Sprucefield.
- 1.12 This includes providing a vital missing link to the city's transport infrastructure, connecting the M1 east-west and A1 north-south corridors with the wider Lisburn conurbation through provision of the long anticipated M1-Knockmore link road connecting Junction 8 of the M1 with the signalised Moira Road/Knockmore Road junction.
- 1.13 The provision of this important new transport corridor will also facilitate a connection to Maze Long Kesh as part of complementary plans to bring forward a future road link directly to this regionally important employment site. That linkage will facilitate a further

- road link to the west to MLK to enable this to connect with the M1-Knockmore link road and the wider strategic road network.
- 1.14 It will, for the first time, enable sustainable orbital transport movements to be undertaken around the city of Lisburn, extending circular bus services through the Blaris lands and connecting to the proposed new rail halt and park and ride planned by Translink at nearby Knockmore, the city centre, the city’s bus and rail stations and to Sprucefield.
- 1.15 It will open up the development of the wider Blaris lands for major economic and housing growth through sustainable mixed use development that will create vital new jobs and a high quality expansion to the city. This will create an attractive new neighbourhood where people will work, live and take their leisure.
- 1.16 The extent of the River Lagan floodplain at Blaris (see revised Design and Access Statement October 2019, page 30-31) provides an effective natural containment to the western expansion of the city in this location and creates the opportunity for double fronted development to the proposed link road.
- 1.17 The floodplain is a constraint that presents a logical physical edge to the urban area of Lisburn which is reinforced by the presence of existing mature woodland to the north of Blaris Road. The masterplan seeks to substantially reinforce this established landscape character with extensive new woodland planting.
- 1.18 It is to this defined constraint that the development limits of the city in this location were endorsed by DoE Strategic Projects, Lisburn City Council (as it then was) and all stakeholders in confirming a Development Framework for the lands in March 2010.
- 1.19 That principle of development extent was reinforced by LCCC in their own vision for the city articulated within its 2015 West Lisburn Development Framework. It was further identified in its Preferred Options Paper of March 2017 and again referenced in its draft Plan strategy issued in October 2019.
- 1.20 This natural constraint represents the logical western extent of the Blaris expansion lands where efficient use of the existing developable capacity of the land should be made to achieve sustainable economic growth in this location.
- 1.21 The outline planning application comprises lands within the ownership and control of the applicant, Neptune Carleton LLP. The application site area forms a substantial part of wider lands at Blaris, West Lisburn identified by LCCC for major mixed use city expansion as part of its West Lisburn Development Framework 2015.
- 1.22 A further revised concept masterplan forms part of the design and access statement (October 2019) that has been specifically prepared for the outline application site and this demonstrates how the wider Blaris lands identified by LCCC could be brought forward to ensure that there is no prejudice to achieving comprehensive development of the wider lands.
- 1.23 The mechanisms for ensuring that the wider area will be comprehensively developed and that road connections and other related service infrastructure and constituent elements of the wider proposal will be brought forward at the appropriate time is a matter to be discussed and agreed as part of a section 76 planning agreement between the applicant and LCCC.
- 1.24 That will involve a legal obligation on the applicant to transfer ‘performance strips’ of land to the Council where they will control the timing of connection to the wider lands in return for agreement on comparable obligations being entered in to in separate section 76 planning agreements for the wider lands at some point in the future.
- 1.25 The ability to deliver this sustainable connectivity with the wider transport network around Lisburn makes the Blaris and nearby Maze Long Kesh sites, with their undoubted strategic employment potential, accessible to greater Lisburn and to the wider West Belfast area with the potential to deliver vital new job creation and address social disadvantage.
- 1.26 The proposed development will bring substantial strategic benefits to the wider accessibility and movement around the city, notably reducing HGV movement in and around the city centre and offering direct access to the established employment areas at Knockmore and Lissue, thereby easing the movement of freight.



- 1.27 The enhancements to the overall transport network will be complemented by committed upgrades and capacity improvements in conjunction with ongoing housing development of the Lisburn Area Plan LD1 zoning.
- 1.28 This includes major junction improvements at Ballinderry Road/Knockmore Road; Prince William Road/Knockmore Road and Ballymacash Road/Prince William Road. The first of these has already been completed with a signalised junction now in place.
- 1.29 These have been the subject of discussion between the respective developers, DfI Roads and LCCC and completion of the respective improvements are anticipated in advance of the opening of the M1-Knockmore link road.
- 1.30 The successful park and ride facility at the A101 dumbbell arrangement at the site's frontage to the M1 will be more than doubled in size which further enhances the Blaris location's highly sustainable credentials. This ties in to recent enhancements to introduce a bus running lane along the M1 hard shoulder to enhance the speed of journey times to Belfast city centre.
- 1.31 A key element of the overall development is to integrate successfully with its existing landscape character. That includes a new riverside park that has the potential to connect to the existing Lagan towpath and enable a continuous leisure corridor running from Blaris through the city of Lisburn and onwards to Belfast.
- 1.32 The overall Blaris development will deliver a significant and substantial economic impetus on both a local and regional scale. Investment in construction across the site will exceed £250million.
- 1.33 Construction of the new M1-Knockmore link road is programmed to start on site in Autumn 2020. This assumes a resolution to grant planning permission by the Council in the first quarter of 2020 and agreement on a s76 to allow formal planning permission by summer 2020.
- 1.34 The construction of the M1-Knockmore link road is anticipated to take around 18 months and will be undertaken in one contract extending the road from the A101 dumbbell junction to Moira Road/ Knockmore Road including a two span bridge over the River Lagan.
- 1.35 It will sustain 76 direct construction jobs and some 46 indirect jobs and contribute some £6.8 million to GVA.
- 1.36 The major mixed use expansion of the Blaris lands has the potential to deliver some 1178 jobs and a GVA of some £42.4 million per annum.
- 1.37 The wider construction phase will generate some 205 direct construction jobs annually and a further 125 indirect jobs and contribute some £194 million GVA.
- 1.38 The overall development once completed is anticipated to raise an additional £2.3million in Council annual rates income.
- 1.39 The scale of the proposal will take several years to complete. It is expected that this may comprise a construction period to 2035.
- 1.40 In terms of housing delivery it is anticipated that the construction of some 80-100 units per annum on the application site would represent a challenging but achievable target, assuming continued strength in the market.
- 1.41 Assuming the construction of the M1-Knockmore link road by early 2022 and initial phase of housing completions around that time an upper level of housing delivery on the application site by 2032 would be c.900-1000 dwellings, allowing for the slower rate of development that will be inevitable in servicing the initial phase.
- 1.42 In addition to the application site it is anticipated that future planning applications will come forward for the wider Blaris lands to the east as infrastructure connectivity extends in line with the development of the initial phases of housing.
- 1.43 Inevitably, the number of dwellings that are proposed will straddle not one but two local development plan cycles, with the balance anticipated to be delivered beyond the stated end date of the emerging LDP for LCCC of 2032.

1.44 In overall terms, development of major mixed use development at Blaris represents a substantial investment with considerable beneficial effects on the wider service economy flowing from the increased spending power it will generate through the construction jobs created as well as further revenue generation through local rates and from putting people back into work and off the social security register.

1.45 Befitting the nature and scale of this proposed development project there has been an exacting and comprehensive process in preparing the full planning application for the M1-Knockmore link road and the outline planning application for the proposed major mixed use city expansion and all of its associated documentation.

1.46 This supporting statement explains:

- the approach that has been taken in preparing the planning applications and the documentation that has been produced;
- the engagement to date with LCCC and its consultees as part of a comprehensive Pre-Application Discussion (PAD) process;
- the extensive public consultation to share the proposal and all related findings of the draft Environmental Statements and related studies with the public and encourage their feedback prior to planning application submission; and
- the planning policy context within which the planning decisions will be taken and the consistency of the proposal with relevant planning policy.

1.47 This supporting statement is complemented by the following planning application documentation:

- Environmental Statement Volume 1; Major Mixed use new neighbourhood; (October 2018)
- Environmental Statement Volume 2; Major mixed use new neighbourhood; (October 2018)
- Environmental Statement Non-Technical Summary; Major Mixed use new neighbourhood; (October 2018)

- Environmental Statement Volume 1; M1-Knockmore link road; (October 2018)
- Environmental Statement Volume 2; M1-Knockmore link road; (October 2018)
- Environmental Statement Non-Technical Summary; M1-Knockmore link road; (October 2018)
- Further Environmental Information submission; Major mixed Use new neighbourhood (October 2019)
- Further Environmental Information submission; M1-Knockmore link road; (October 2019)
- Design and Access Statement – Major mixed use new neighbourhood; (October 2019)
- Design and Access Statement – M1-Knockmore Link Road; (October 2019)
- Pre-application Community Consultation (PACC) report (October 2018); and
- Full package of application drawings (including full detailed design of proposed M1-Knockmore link road and bridge over River Lagan). (updated October 2019)

**Pre-Application Discussion (PAD) Process**

1.48 The planning application submitted in November 2018 followed substantive consultation with LCCC’s planning team and statutory consultees to share first the draft proposals and related environmental information and then make the formal planning application submission in November 2018. The approach throughout has been to try and make its content as robust, comprehensive and responsive as possible.

1.49 A wide range of organisations were consulted as part of the PAD process and their views gathered on the proposed development, including:

- Lisburn and Castlereagh City Council Planning department;
- LCCC Environmental Health;
- LCCC Economic Development;

- DfI Rivers Agency;
- DAERA Inland Fisheries;
- DfI Roads Service – Network Planning section; Design Consultancy
- Northern Ireland Electricity (NIE);
- DAERA – Water Management Unit;
- DAERA Land and Resource Management Unit;
- DAERA Natural Heritage;
- DAERA Protecting Historic Monuments;
- NI Water;
- Maze Long Kesh Development Corporation; and
- Translink.

1.50 The comments and feedback received from all of the above alongside the environmental legislation requirements have confirmed the environmental information relevant to the proposed development and which have been the subject of Environmental Impact Assessment (EIA).

1.51 The EIA of the proposed developments at Blaris have addressed the following:

- Population, including Economic Impact assessment;
- Transportation, including Transport Assessment;
- Noise;
- Air Quality;
- Ecology;
- Soils, water and contaminated land;
- Hydrology and drainage;
- Landscape and visual;
- Cultural heritage;
- Material assets; and
- Climate change.

## EIA Process

1.52 EC Directive 85/337/EEC (as amended) outlines the need to undertake an assessment in line with the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.

1.53 The Regulations primarily describe an extended range of developments within two Schedules. For Schedule 1 developments, an EIA is always mandatory.

1.54 The proposed development falls within Schedule 2 10 (b) of the EIA Regulations (NI) 2017 defined as an urban development project

1.55 The purpose of the assessment process is designed to help produce an environmentally sensitive scheme.

1.56 Detection of adverse environmental impacts at an early stage enables appropriate mitigation measures to be built into development proposals at the earliest opportunity. In addition to operational impacts, the assessment also considers the environmental impacts associated with the construction of the scheme.

1.57 The methodology that has been incorporated into the EIAs can be summarised as follows:

- consultation / scoping exercise – compiling relevant background data and identifying issues and constraints;
- baseline surveys – site walkover visits, detailed specialist surveys and discussions with relevant statutory and other consultees, to determine nature and status of the existing environment;
- impact assessment – predicting the likely environmental impacts of the scheme during construction and operation and evaluating the significance of such impacts;
- development and description of mitigation proposals as part of the final design of the scheme;
- assessment of residual impacts and their significance;
- reporting the draft assessment – preparation of a draft ES and Non-Technical Summary;

- liaison with LCCC and statutory consultees to seek their feedback on the content of the draft ES;
- review and refinement of the draft ES taking on board comments received during the PAD process and public consultation; and
- final publication of ES.

1.58 The responses received from statutory consultees during the processing of the outline and full planning applications in the period since November 2018 has necessitated the preparation of Further Environmental Information in respect of both the outline and full planning applications. That now forms part of a further submission accompanying this revised supporting planning statement and the revised design and access statements.

1.59 This document is structured as follows:

- Chapter 2 provides commentary on the site description and surrounding context;
- Chapter 3 describes the development proposal;
- Chapter 4 outlines the key planning policy context (Regional, Strategic, Local);
- Chapter 5 provides consideration of the proposed development against relevant planning policy and outlines the material considerations that weigh in favour of the grant of planning permission; and
- Chapter 6 contains conclusions.

## 2. Description of the Site

- 2.1 This revised supporting planning statement relates to two separate planning applications, an outline planning application submission for a major mixed use new neighbourhood on lands extending to a total site area of 111.74 hectares and a full planning application for a key element of the overall development, the provision of the M1-Knockmore link road extending to some 1.6km in length and comprising an application site area of 17.6 hectares.
- 2.2 The site is located some 1.7km to the south west of Lisburn city centre.
- 2.3 It is bisected by Blaris Road in an east west direction and is bound by the M1 to the south. To the north the boundary follows the River Lagan in part and by the Moira Road/Knockmore Road junction.
- 2.4 Further north lies a concentration of employment uses at Lissue and Knockmore Industrial estates.
- 2.5 To the east, in its northern section the site is bounded by Priests Lane which connects to a number of existing dwellings and by a series of undeveloped field parcels and further south of Blaris Road by agricultural fields.
- 2.6 To the west the site is defined by agricultural fields.
- 2.7 The M1 sits adjacent to the site's southern boundary connecting the east of the province with the west with the A1 Belfast-Dublin corridor connected to the site from the short A101 link road constructed as part of the initial phase of Sprucefield Park some 15 years ago.
- 2.8 There is an existing park and ride facility within the site boundary accessed from the existing dumbbell junction arrangement.
- 2.9 Towards the north of the site lies the River Lagan and further north and north-west lies a concentration of established employment uses at Lissue and Knockmore Industrial Estates.
- 2.10 The site contains some existing buildings, most notably Carlton House farmstead situated towards the north of the site and accessed via a lane from

Blaris Road. Carlton House is surrounded by a comparatively high number of trees whereas in other areas of the site there is only a scattering of single trees lining Blaris Road or access roads. There are no other notable clusters of trees.

- 2.11 Where the Carlton House access road meets Blaris Road there is an existing Masonic Hall. The proposals will not impinge upon the retention of this building..

### Planning History

- 2.12 Lands at Blaris were the subject of a previous outline planning application for a major mixed use urban extension made to the former DoE Planning Service in April 2006.
- 2.13 That was subsequently withdrawn at the Department of Environment's (DoE) Strategic Projects team's request to focus on agreeing a Development Framework for the wider Blaris lands following the Department's endorsement of major mixed use development at this location in its evidence to the BMAP Inquiry sessions held in December 2007 and January 2008.
- 2.14 A development framework for the wider Blaris lands was prepared over the period February 2008-October 2009 and involved a comprehensive range of stakeholders including the then Lisburn City Council, DoE Strategic Projects team, Roads Service, SIB (Maze/Long Kesh) and a range of internal divisions of NIEA.
- 2.15 The 2006 outline planning application was withdrawn in June 2008 as the initial Development Framework sessions gathered momentum.
- 2.16 The Development Framework for Blaris was subsequently agreed and formally signed off by the then Head of DoE Strategic Projects in March 2010. (Annex 6)
- 2.17 It was agreed at a time when the economic downturn had taken a firm hold and when the wider property market had slowed dramatically. As a consequence of that, developer appetite and ability to fund planning applications and all related activity came to an abrupt halt.

- 2.18 Notwithstanding that the Department at that time had importantly clarified its view that early phases of development could be permitted in advance of the PAC reporting on BMAP with the agreed Development Framework in place to guide these.
- 2.19 That position was however not to be achieved as the property crash removed the availability of development finance and confidence evaporated meaning that major development proposals at Blaris were shelved pending a financial and market recovery.
- 2.20 Notably the Development Framework agreed by all parties in October 2009 did not seek to restrict the western edge of the city's expansion to a development edge defined by the alignment of the M1-Knockmore link road.
- 2.21 The extent of the River Lagan floodplain (see Design and Access Statement, page 30-31) provides an effective natural containment to the western expansion of the city in this location and creates the opportunity for double fronted development to the proposed link road.
- 2.22 The floodplain is a constraint that presents a logical physical edge to the urban area of Lisburn which is reinforced by the presence of existing mature woodland to the north of Blaris Road. That woodland character will be substantially extended and reinforced by further new woodland planting proposed as part of the outline planning application.
- 2.23 It is to the defined floodplain constraint that the development limits of the city in this location were endorsed by DoE Strategic Projects, Lisburn City Council (as it was) and all stakeholders in confirming the Development Framework for the lands in March 2010. LCCC itself has endorsed this in its endorsed WLDF 2015.
- 2.24 This natural constraint represents the logical western extent of the Blaris expansion lands where efficient use of the existing capacity of the land should be made to achieve sustainable economic growth in this location.

### 3. Description of the Project

3.1 The proposed sustainable mixed use neighbourhood comprises the following elements:

- A new residential neighbourhood of some 1300 dwellings incorporating a mix of house types including detached, semi-detached, terraced dwellings and apartments;
- A mix of employment uses totalling some 754,000 sq.ft. floorspace that will accommodate B1a, B1b, B1c, B2, B3 and B4 employment/business uses and appropriate sui generis uses;
- The M1-Knockmore link road, designed to dual carriageway standard along its initial length to a new roundabout junction linking in to the employment area and to a potential new link road to Maze Long Kesh before adjusting to a four lane road with no central reservation, consistent with the existing standard of the Knockmore Road. Two signal controlled junctions will be introduced at Blaris road/M1-Knockmore link road and further to the north to enable access to the residential development;
- Neighbourhood facilities including convenience food retail, leisure, service, office, health, food and drink, community and other non-residential floorspace as part of a community hub or core focused along Blaris Road and at the site's northern gateway;
- A hotel and restaurant/pub with prominent frontage to the new link road and proximity to the Blaris Road commercial core;
- A retained and substantially expanded Park and Ride site at the site's southern frontage with the M1 with capacity for some 700 car parking spaces; and
- A wide variety of open space including a new bio-rich River park incorporating cycle/walkways, local parks and green corridors to integrate with the proposed housing north of Blaris Road.

3.2 A detailed explanation of the revisions that have been made to the masterplan is provided in Chapter 2 of

the accompanying Further Environmental Information submission and at para 1.9 of the revised Design and Access statement (October 2019) and is not repeated again in this statement but should be referred to accordingly. It also identifies parameter plans that set out the location, footprint and anticipated building height of the respective land uses (Appendix 2.1).

#### Road Infrastructure – M1-Knockmore Link Road

3.3 The construction of the M1-Knockmore link road will be undertaken in one contract and form the early phase of development on the site.

3.4 The M1-Knockmore link road is the subject of a full planning application supported by an Environmental Statement. Chapter 2 of Environmental Statement Volume 1 provides a detailed explanation of the proposed development with adjustments arising from DfI Roads detailed review of the proposals articulated in the FEI submission at Chapter 2.

3.5 It is anticipated that an initial phase of housing development, to be the subject of a separate full planning application, will proceed in parallel with the M1-Knockmore link road construction works.

#### Construction Programme

3.6 Construction works are programmed to commence on site at the first opportunity upon securing planning permission. The construction of the M1-Knockmore link road is expected to take some 18 months and assuming a start on site in September 2020 would be open to traffic by as early as spring 2022.

3.7 The overall development of the wider application site is anticipated to comprise of a 15 year development programme, dependent on market performance and the level of take-up for the residential and commercial land uses.

3.8 Revised Comprehensive design and access statements (October 2019) for the proposed new neighbourhood and the M1-Knockmore link road provide clarity on the overall design vision for the site and anticipated phasing and should be referred to accordingly.

## 4. Planning Policy Context

4.1 The following provides an overview of regional and local planning policy that is relevant to the proposed development. Chapter 5 specifically assesses the decision making context and the proposed development’s compliance with all relevant planning policy.

### Regional

#### ***Regional Development Strategy for Northern Ireland 2035 (Building a Better Future)***

4.2 The Regional Development Strategy (RDS) is the strategic and long term perspective on the future development of Northern Ireland up to the year 2035. All government departments are required to have regard to it in the exercise of any development function.

4.3 It is a framework which provides strategic context for where development should happen but is not a fixed blueprint or masterplan (para 1.5).

4.4 It sets out a series of key aims that include:

- **Support strong, sustainable growth for the benefit of all parts of Northern Ireland**

In seeking to achieve this it finds that a growing regional economy will benefit from strong urban and rural areas. This needs a co-ordinated approach to the provision of services, jobs and infrastructure and a focus on co-operation between service providers. Importantly it confirms that balanced regional growth and tackling regional imbalance are critical issues for the region.

- **Strengthen Belfast as the regional economic driver and Londonderry as the principal city of the North West**

The Strategy identifies the Belfast Metropolitan Urban area (Diagram 2.3, p.28) as the principal gateway to the province which includes the Lisburn and Castlereagh City Council area. It confirms that successful regions have strong and vibrant cities at their core with this wider

area driving much of the economic growth and sharing its wealth across the Region.

- **Promote development which improves the health and well-being of communities**

It further explains that a healthy community is better able to take advantage of the economic, social and environmental opportunities which are open to it. Improved health and well-being is derived not only from easy access to appropriate services and facilities, although this is important, but also from the creation of a strong economy set within a safe and attractive environment.

- **Improve connectivity to enhance the movement of people, goods, energy and information between places**

It makes clear that improved connectivity will support the network of towns and their associated hinterlands. Good linkages between towns and rural areas for access to services and business opportunities are vital.

- **Protect and enhance the environment for its own sake**

It asserts that protecting the environment is essential for enhancing the quality of life of current and future generations.

- **Take actions to reduce our carbon footprint and facilitate adaptation to climate change**

There is a need to reduce and offset impact on the environment and reduce harmful green house gas emissions to help reduce the threat of climate change and promote sustainable construction, consumption and production.

- **Strengthen links between north and south, east and west, with Europe and the rest of the world**

Collaboration on a north/south basis is promoting the development of gateways and cross border connections. Opportunities exist to further develop this along with improved East/West linkages.



4.5 It identifies a top priority of growing a sustainable economy and that spatial planning and related infrastructure development is essential to achieving this.

4.6 The RDS sets out two types of strategic guidance. The first of these relate to regional guidance (RG) which applies to everywhere in the region and which are presented under the three themes of Economy, Society and Environment.

4.7 The second relate to spatial framework (SF) guidance which is tailored to five wider themes within the Spatial Framework, the Metropolitan Area centred on Belfast, Londonderry as the principal city of the North West, Hubs and clusters of Hubs, the rural area and gateways and corridors.

**Regional Guidance**

4.8 In terms of Regional Guidance, RG1 seeks to ensure an adequate supply of land to facilitate sustainable economic growth.

4.9 Para 3.3 makes it clear that in order to ensure that Northern Ireland is well placed to accommodate growth in jobs and businesses there should be an adequate and available supply of employment land. The focus will be on larger urban centres and regional gateways taking advantage of their locations on the regional transport network.

4.10 RG2 seeks to deliver a balanced approach to transport infrastructure. Para 3.4 asserts that to remain competitive in a global market it is important to continue to promote transport which balances the needs of our environment, society and economy. The focus is on managing use of road and rail space and how we can use our network in a better, smarter way. That includes embracing the following:

- *improve connectivity, including more attractive transport choices;*
- *maximise the potential of the regional strategic transport network and reduce where possible unsuitable traffic into towns;*
- *use road space and railways more efficiently, including an improvement in the public transport*

*service. Continued investment in public transport and infrastructure such as the development of quality multi-modal facilities and park and ride sites that will encourage the motorist to take the bus or train for the main part of their journey and reduce the volume of traffic on the network;*

- *improve social inclusion;*
- *manage the movement of freight; and*
- *improve access to our cities and towns, providing transport solutions to growth areas which are the drivers of our region. They require particular solutions that address congestion and ensure the free movement of people and goods.*

4.11 RG3 looks to implement a balanced approach to telecommunications infrastructure that will give a competitive advantage. The key challenge for the Region is to improve international and internal connectivity and to ensure that the opportunities provided by access to high quality telecommunications services are fully exploited.

4.12 RG4 seeks to promote a sustainable approach to the provision of tourism infrastructure. Investment in tourism brings new facilities to our towns, cities and surrounding landscapes.

4.13 RG5 looks to deliver a sustainable and secure energy supply. That includes provision of new gas infrastructure and smart grid initiatives.

4.14 RG6 seeks to strengthen community cohesion, developing integrated services and facilities, fostering stronger community spirit and sense of place and encouraging mixed housing development.

4.15 RG7 supports urban and rural renaissance. That includes ensuring that environmental quality in urban areas is improved and maintained particularly with regard to adequate provision of green infrastructure.

4.16 RG8 identifies the need to manage housing growth to achieve sustainable patterns of residential development.

4.17 Para 3.15 confirms that housing is a key driver of physical, economic and social change in both urban

and rural areas. It also emphasises that strategic planning places emphasis on the importance of the relationship between the location of housing, jobs, facilities and services and infrastructure.

- 4.18 This includes the need for development patterns that do not have an adverse impact on environmental resources and the built heritage and which mitigate the risk of flooding by avoiding those areas known to be at risk.
- 4.19 Any proposed housing development will be dependent on the availability of all necessary infrastructure, including the availability of sustainable water resources and sewerage capacity.
- 4.20 Paragraph 3.19 confirms a two-pronged approach to promoting more sustainable housing development within existing urban areas, encouraging compact urban forms in addition to the promotion of more housing within existing urban areas.
- 4.21 RG9 looks to reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality.
- 4.22 RG10 is focused on managing our waste sustainably.
- 4.23 RG11 looks to conserve, protect and where possible enhance our built heritage and our natural environment.
- 4.24 Para. 3.29 identifies that everyone should have a right to, and be able to live in, a healthy environment with access to sufficient and appropriate environmental resources for a healthy life.
- 4.25 RG12 promotes a more sustainable approach to the provision of water and sewerage services and flood risk management. That includes integrating water and land use planning, managing future water demand and encouraging sustainable surface water management.

**Spatial Framework Guidance**

- 4.26 SFG1 promotes urban economic development at key locations throughout the BMUA and ensure sufficient land is available for jobs.
- 4.27 Para 3.41 confirms that significant investment will be required to sustain and grow the BMUA. Employment opportunities should be planned in a way that recognises the roles that the component parts play; builds on planned regeneration initiatives and maximises the use of existing and planned infrastructure provision, including public transport.
- 4.28 That involves identifying and protecting key locations for economic growth to strengthen the role of the BMUA as the regional economic driver. That includes major employment/industrial locations in Belfast Harbour Area (including Titanic Quarter), West Lisburn/Blaris, Purdysburn and Global Point/Ballyhenry being connected to public transport that will support the drive to provide a range of opportunities for job creation.
- 4.29 In relation to Lisburn Para 3.41 seeks to enhance Lisburn City as a major employment and commercial centre. It notes that it is strategically located at the meeting of key transport corridors and has high development potential and the scope to generate additional jobs. Potential exists to grow the leisure offer and create high quality office offer through the creation of employment in business services.
- 4.30 SFG4 focuses on managing the movement of people and goods within the BMUA. This recognises that transport has a key role to play in developing competitive cities and regions.
- 4.31 Key elements that need to be considered include:
  - *Managing travel demand within the BMUA;*
  - *Improving the public transport service;*
  - *Integrating Land Use and Transportation;*
  - *Introducing a rapid transit system; and*
  - *Managing the efficient movement of freight, and in particular access to the motorway network.*

- 4.32 SFG5 looks to protect and enhance the quality of the setting of the BMUA and its environmental assets.
- 4.33 It acknowledges the need to protect areas of high scenic value, undeveloped coast line, Belfast Lough, the Lagan Valley Regional Park and the hills around the BMUA from development.
- 4.34 It encourages opportunities to be sought which increase access to these areas for residents and tourists consistent with protecting their integrity and value. It also seeks to encourage opportunities to be taken for connections to an enhanced network of pedestrian paths, cycle-ways and ecological corridors. These opportunities have the potential to support biodiversity by linking ecological areas creating a network of green spaces throughout the BMUA.
- 4.35 The RDS addresses the need to develop regionally significant economic infrastructure in its Chapter 4, page 82. Strategic projects which will contribute to economic infrastructure development are considered to be those that:
- *Deliver strategic improvements in external and internal communications including transport and telecoms;*
  - *Contribute to the achievement of renewable energy targets;*
  - *Contribute to the achievement of waste management and climate change targets; or*
  - *Raise issues of regional or more than regional importance*
- Strategic Planning Policy Statement**
- 4.36 Para 2.1 of the SPPS clarifies the objective of the planning system, consistent with Part1, Section 1 of the Planning Act (Northern Ireland) 2011. That is to secure the orderly and consistent development of land whilst furthering sustainable development and improving well-being.
- 4.37 This means the planning system should positively and proactively facilitate development that contributes to a more socially, economically and environmentally sustainable Northern Ireland. (Para. 2.1)
- 4.38 In order to make positive change on the ground planning authorities should prioritise timely and predictable decision-making to support positive place-making and effective stewardship that contributes to shaping high quality sustainable places to live, invest, work and spend leisure time in. (Para. 2.2)
- 4.39 A key dimension of sustainable development for Northern Ireland is economic growth. This requires the planning system to continue to provide protection to the things we cherish most about our built and natural environment, including our heritage assets while unlocking development potential, supporting job creation and aiding economic recovery for the benefit of all of our people. (Para 2.2)
- 4.40 Para 3.5 confirms that housing is recognised as a key driver of physical, economic and social change in both urban and rural areas. In furthering sustainable development it is important to manage housing growth in a sustainable way, placing particular emphasis on the importance of the inter-relationship between the location of local housing, jobs, facilities and services and infrastructure.
- 4.41 It also makes clear that it is similarly important to successfully integrate transport and land use generally in order to improve connectivity and promote more sustainable patterns of transport and travel.(Para. 3.5)
- 4.42 Under the SPPS the guiding principle for planning authorities in determining planning applications is that sustainable development should be permitted, having regard to the development plan and all other material considerations, unless the proposed development will cause demonstrable harm to interests of acknowledged importance. (Para 3.5; 5.72)
- 4.43 Para 4.19 states that planning authorities should take a positive approach to appropriate economic development proposals, and proactively support and enable growth generating activities. Large scale investment proposals with job creation potential should be given particular priority. It adds that planning authorities should also recognise and encourage proposals that could make an important contribution to sustainable economic growth when drawing up new plans and taking decisions.

- 4.44 Para 5.1 confirms that Councils have the positive task of guiding appropriate developments to the right places while preventing developments that are not acceptable.
- 4.45 Paragraph 5.8 affirms that development management is a key part of an effective planning system, focused on maximising the achievement of planning objectives including high quality of design and place-shaping with a focus on pre-application discussion.
- 4.46 It should also support the (suspended) Executive’s central purpose of growing a dynamic, innovative, sustainable economy balanced with improving our society and protecting as well as enhancing our environment.
- 4.47 It further confirms that the objective of furthering sustainable development and the supporting core planning principles that give expression to it should be applied to plan-making and decision taking.
- 4.48 Para 5.45 of the SPPS outlines that major developments, such as these proposals for Blaris, have important social, economic and environmental implications for a council area.
- 4.49 It also confirms that a key element of the enhanced arrangements for community engagement is ensuring that community views are reflected at the earliest stage. Applicants for all major developments will therefore be required to demonstrate that they have undertaken consultation with the community prior to the submission of a planning application.
- 4.50 Para 5.73 provides some commentary on prematurity. It confirms that where a new LDP is under preparation or review it may be justifiable, in some circumstances, to refuse planning permission on the grounds of prematurity.
- 4.51 It adds that this may be appropriate in respect of development proposals which are individually so substantial, or whose cumulative effect would be so significant, that to grant planning permission would prejudice the outcome of the plan process by predetermining decisions about the scale, location or phasing of new development which ought to be taken in the LDP context.

**Planning Policy Statements**

- 4.52 There are a number of planning policy statements that contain policies of relevance to the proposal. These are addressed further in Section 5 of this statement.
- 4.53 These include:
- PPS2 (Natural Heritage);
  - PPS3 (Access, Movement and Car parking);
  - PPS4 (Planning and Economic Development);
  - PPS4 (Clarification of Policy PED 7);
  - PPS6 (Planning, Archaeology and the Built Heritage);
  - PPS7 (Quality Residential Environments);
  - PPS8 (Open space, sport and outdoor recreation);
  - PPS12 (Housing in Settlements);
  - PPS13 (Transportation and Land Use);
  - PPS15 (Planning and Flood Risk)
  - PPS16 (Tourism).

**Local**

- 4.54 Section 45 (1) of the Planning Act (NI) 2011 requires the Council, in dealing with a planning application, to have regard to the local development plan, so far as material to the application and to any other material considerations.
- 4.55 Adoption of the Belfast Metropolitan Area Plan 2015 (BMAP) was declared unlawful by the Court of Appeal on 18 May 2017.
- 4.56 As a result of this, the Lisburn Area Plan 2001 (LAP) operates as the statutory adopted LDP for the area with draft BMAP a material consideration with the weight to be given to it the subject of planning assessment based on the site specifics of each individual case.
- 4.57 LCCC has begun preparation of its Local Development

Plan having published its Preferred Options Paper in March 2017. That identifies their view that Blaris should be re-designated as a Major mixed use site and that early delivery of the M1-Knockmore link road is a priority infrastructure project for the city. It references the Council's West Lisburn Development Framework 2015 in setting out the broad vision of land use in this location.

4.58 In October 2019 LCCC published its draft plan strategy which is the subject of a public consultation period running from November 2019 to January 2020.

4.59 That confirms the development of lands at Blaris as a strategic mixed use site including an allocation of 1350 houses over the current LDP plan period to 2032.

4.60 Its Map 7 (p79) suggests a development limit of the M1-Knockmore link road which does not reflect the natural developable extent provided by the River Lagan floodplain, the western future road link connection allowed for to MLK, the Council's own vision expressed in its WLDF 2015 for major mixed use development in this location or indeed the agreement on a development framework reached by DoE Strategic Projects and the former Lisburn City Council in 2010 on which much of its WLDF is based.

4.61 It also suggests a LLPA/Linear Park which includes developable land at the site's northern gateway on either side of the proposed M1-Knockmore link road which has been identified in the 2010 agreed Development Framework and the Council's 2015 WLDF and is a fundamental part of these application proposals. The draft plan strategy will be the subject of objection by Neptune Carleton LLP and has limited wait given the early stage it has reached.

4.62 The Council must make its decision based on the development plan and all other material considerations. The application lands have been the subject of a comprehensive master planning process that will not prejudice development of the wider Blaris lands.

4.63 There will be a transfer of lands at the connection points within the site to LCCC and obligations placed on the applicant through a section 76 legal agreement to deliver internal road infrastructure to these points in line with a phased approach to the site's development. The material considerations

which must weigh in favour of positive determination of these planning applications are articulated in detail at Section 5 of this statement

#### ***Lisburn Area Plan 2001 (LAP)***

4.64 The LAP, with an evidence base prepared over 20 years ago, identifies the application sites as being outside the settlement limits of Lisburn and within the Green Belt.

#### ***Draft BMAP and Belfast Metropolitan Transport Plan (BMTP)***

4.65 Draft BMAP, published in November 2004, identified lands at Blaris under Zoning LC07 for Employment/ Industry with a substantial area of open space identified as LC37 of open space either side of the River Lagan. (Annex 1, proposals map extract)

4.66 The revised settlement limit in the draft Plan is defined at its western extent by the alignment of the Knockmore-M1 Link road, designated under Proposal LC 17/01.

4.67 The draft plan was the subject of objection by the Blaris Development Partnership, a joint venture by developers Snoddons and Killultagh.

4.68 That sought modifications to the draft Plan to fully recognise the strategic growth opportunity presented by the lands at Blaris. That argued that the wider lands be identified as a major mixed use development site, reflecting the Regional Development Strategy approved by the Assembly in September 2001 which anticipated major mixed use development at the meeting point of the M1 and A1 transport corridors.

4.69 Specifically, it presented evidence to the Inquiry that BMAP must properly reflect the RDS's strategic direction and that it should allocate a major mixed use allocation at Blaris, including a campus style business park and a significant new residential neighbourhood.

4.70 That emphasised the thrust of strategic planning policy in seeking to achieve sustainable mixed use expansion through promoting integration of major employment and housing land uses to locations where they can enhance infrastructural capacity and offer greater potential to be served by improved public transport.

- 4.71 In advance of the opening of the BMAP Inquiry the Department published a paper in January 2007 setting out its adjusted approach to housing growth indicators (Annex 2, DOE January 2007 BMAP paper). This acknowledged that the RDS set a clear direction that West Lisburn should be a location for future planned expansion and that it should be a main focus for any additional future housing growth (along with Newtownabbey) and this should be a prime consideration in determining the location of additional lands for housing.
- 4.72 The BMAP Inquiry opened in April 2007. Its early sessions heard debate on strategic arguments relating to the amount and distribution of housing across the Plan area.
- 4.73 In these exchanges the Department conceded that the amount of housing land identified in draft BMAP was insufficient. It conceded the need to identify further lands, adding some 12,000 dwellings to the supply.
- 4.74 It also committed to an exercise of assessing objection sites that were not included in the draft Plan and identifying a criteria based assessment to highlight their preferred sites for inclusion within the Plan. Such an exercise was of key importance to assist the Inquiry process and enable the site specific stage of the Inquiry to be dealt with in an informed manner.
- 4.75 In June 2007 the Department published a Housing distribution paper which identified a marked change in its assessment of the Blaris/West Lisburn objection lands (Annex 3, DOE June 2007 BMAP paper).
- 4.76 This comprised a larger site and mixed land use, later endorsed by the DoE in the subsequently agreed Development Framework document. (Annex 4, BMAP revised allocation plan) That confirmed that all of the lands identified on the revised allocation plan should be brought within the development limits for Lisburn with development on either side of the M1-Knockmore link road considered to contribute to a more compact settlement pattern. It recognised the natural containment to development presented by the River Lagan floodplain.
- 4.77 The site specific session for the Blaris lands took place in December 2007. The DoE made clear its agreement to the extent of the lands beyond the draft BMAP limits and confirmed its A1 grading attributed within its June 2007 paper. It also agreed that the expanded zoning should broadly be developed equally for employment and residential use.
- 4.78 In supporting much of the wording of a revised LC07 policy the Department confirmed that agreement of a Development Framework for all of the lands at Blaris was essential to guide future planning applications for the site's development.
- 4.79 Following the BMAP hearing clarification of the content of the much revised LC07 policy was sought with the Department. In light of the significant agreement reached at the Inquiry this was captured in correspondence and discussed at some length with the BMAP Manager and Head of Strategic Projects at meetings held in February and May 2008 (Meeting notes, Annex 5).
- Blaris Development Framework/Transport Master Plan (formally agreed by DoE Strategic Projects team March 2010)***
- 4.80 DoE Strategic Projects agreed to facilitate a workshop approach to preparation of a Development Framework (DF) for Blaris. It also clarified its view that early phases of development could be permitted in advance of the PAC reporting on BMAP with an agreed Development Framework in place to guide these.
- 4.81 In the 20 month period from February 2008 to October 2009 a Blaris Development Framework was prepared following a highly collaborative and co-ordinated process working closely with DoE Strategic Projects, the then Lisburn City Council, DRD Roads Service, Strategic Investment Board, NI Water, Rivers Agency, Invest NI, SEELB, Landscape Architects Branch ,NIEA and Translink. That involved a series of workshops in the period February-July 2009 addressing key elements of the proposed development.
- 4.82 The final Development Framework was formally endorsed by the DoE Head of Strategic Projects in March 2010. (Annex 6, copy of letter from Director of Strategic Planning; Annex 7 Blaris Development framework agreed masterplan)

- 4.83 Unfortunately securing an agreed Framework ran in parallel with the height of the global property crash which had a substantial and immediate impact across all property and economic sectors in Northern Ireland.
- 4.84 Major development projects such as the Blaris proposals were instantly impacted by the loss of confidence in the market and the lack of liquidity to finance such major investment schemes. The absence of these critical factors continued for several years with housebuilding showing little signs of recovery in the period from 2009 until 2013/14.
- PAC report on dBMAP Public Inquiry and BMAP Adoption***
- 4.85 The PAC report of the Inquiry (Annex 9) had been shared with DoE in July 2011 after they had endorsed the Development Framework for the site. It recommended maintaining the site as an employment zoning based on its interpretation of the RDS. It noted that wider housing zonings have key site requirements requiring them to contribute to the provision of the M1-Knockmore link road. It recognised the importance of the road to the development in the whole of west Lisburn.
- 4.86 The then Minister Attwood in releasing the PAC report - to the public in 2012 confirmed these were only PAC recommendations and that the final view lay with the DoE.
- 4.87 In light of the DoE agreed Development Framework, approved in March 2010 following more than 18 months of collaborative engagement involving the Head of Strategic Projects and its Planning Manager it was not unreasonable to expect that the DoE would not accept the recommendations of the PAC in relation to Blaris.
- 4.88 As the final decision taker on BMAP it was reasonable to expect that the lengthy and detailed consideration given to the publication of the Development Framework and the support for it from all statutory bodies and including Lisburn City Council would be given substantial weight in DoE's decision making.
- 4.89 Inexplicably, given this background, the DoE did accept the recommendations in its adoption statement of September 2014.
- 4.90 It did so with no reference whatsoever to the previously agreed development framework that DoE Strategic projects had facilitated and spent 18 months agreeing in detail with a very extensive range of key stakeholders.
- 4.91 That decision can only reasonably be explained by a lack of awareness of the detailed discussion and collaboration in agreeing the Development Framework as a consequence of the most senior DoE figures involved in the BMAP Inquiry having retired post the agreement on the Development Framework and the absence of planning application activity to give legal effect to it as a consequence of the worst property crash in living memory.
- 4.92 The property crash also meant that the developers promoting the site had been drawn in to NAMA's impaired asset review and this contributed to them not bringing a challenge to the DoE position.
- 4.93 The subsequent legal challenge to BMAP has meant that its status has reverted to draft.
- 4.94 That must require all of the previous planning history relating to the principle of major mixed use expansion at Blaris to be weighed up as important material considerations in determining these planning applications.
- 4.95 The DoE agreement at the BMAP Inquiry to the lands being zoned for major mixed use development and subsequent engagement in detailed workshop based discussions to agree a comprehensive Development Framework and Transport Master Plan plainly established the acceptability of the principle of the Blaris lands for major mixed use expansion at that time.
- 4.96 However, planning applications did not follow to give legal effect to this and the subsequent PAC Inquiry report means the development plan status is the subject of tension between the Development Framework agreed with the Department in October 2009 and the PAC's later recommendations in 2012 which are considerably more restrictive in the extent and content of the wider zoning.
- 4.97 LCCC's emerging successor plan, first in confirming its major mixed use vision for Blaris as identified in its WLDF 2015 and reaffirmed in its Preferred Options

Paper for its LDP issued in March 2017 and its more recent draft Strategy Plan of October 2019 establish a strategic mixed use expansion of Lisburn at Blaris with an allocation of housing over the period to 2032 of 1350 dwellings

***Belfast Metropolitan Transport Plan (BMTP)***

- 4.98 The BMTP was published in November 2004.
- 4.99 It was produced to complement the BMAP and identifies the transport schemes and measures expected to be implemented over the anticipated plan period of BMAP to 2015.
- 4.100 It presents a programme for action in terms of transport proposals and priorities over the plan period, identifying a range of initiatives aimed at delivering a modern integrated transport system for the Belfast Metropolitan Area (BMA) that is in line with the Regional Transportation Strategy.
- 4.101 Its figure 6.11 (Annex 10) identified eight non-strategic highway network schemes to complement the strategic highway network across the wider Belfast Metropolitan Area.
- 4.102 Two of these proposed schemes were anticipated to come forward in Lisburn. One was the M1-Knockmore link with the other being the North Lisburn feeder road. The North Lisburn feeder road was delivered as part of an Article 40 planning agreement in respect of a planning application for developing housing zonings committed through the Lisburn Area Plan. It was constructed some 10 years ago, prior to the economic downturn.
- 4.103 The strategy for the BMTP is confirmed at its paragraph 6.45 as comprising:
  - The application of traffic management measures on the non-strategic highway network to improve the flow of traffic and reduce the negative impact of traffic with particular emphasis on residential areas and the main urban centres; and
  - The provision of non-strategic highway schemes to provide traffic relief to the main urban centres and to provide suitable road links to committed developments and major new development sites that are being considered by BMAP.

- 4.104 In terms of the non-strategic highway network schemes linked to potential development opportunities or to give relief to urban areas para. 6.52 of BMTP confirmed the following:
  - A new road, the M1-Knockmore link, to the west of Lisburn (estimated cost £11.8million); and
  - The North Lisburn feeder road (estimated cost £11.1 million).
- 4.105 Para. 6.53 confirmed that the implementation of the above schemes will be developer led with funding at the appropriate level. It further articulates that developers will be responsible for funding the scheme either in full or in a very substantial part. The Department’s priority for funding will be concentrated on the construction of major capital works schemes on the strategic network. Any contribution towards developer-led schemes will be subject to detailed economic appraisal, the availability of funding and inclusion within the major works programme.

***LCCC – West Lisburn Development Framework***

- 4.106 To reinforce its desire to see major mixed use development at Blaris in the context of the wider West Lisburn area, the newly installed LCCC began the process of establishing its vision in its West Lisburn framework which looked at the wider 1000 acres of land comprising Blaris, the regionally important Maze Long Kesh site and wider environs.
- 4.107 Work on this began in the first half of 2014 in advance of the publication of the BMAP adoption statement. The West Lisburn Development Framework (WLDF) was subsequently published in April 2015 as a non-statutory document (see Zoning Plan, Annex 8).
- 4.108 It reflects the former Lisburn City Council’s integral role in securing agreement with DoE Strategic Projects team and the wider stakeholders within the endorsed Development Framework of Oct 2009. Naturally, the Blaris development framework is referenced on a number of occasions within the WLDF.
- 4.109 The WLDF references previous Lisburn City Council’s Physical Development Strategies of 1996 and 2002 and outlines the position expressed by the Council during the BMAP process that the Blaris lands provide a natural expansion for Lisburn city and that



successive plans have reaffirmed the lands as being an ideal strategic location for a major mix of land uses. It also recognises that the floodplain forms the natural westward limit to development in this location.

- 4.110 The importance of delivering two major infrastructure projects, specifically the M1-Knockmore link road and the West Lisburn rail halt/park and ride are also emphasised.
- 4.111 The WLDF has been produced with the intention of being the overarching strategy document for the wider West Lisburn area in the period to 2035.
- 4.112 It specifically confirms that it establishes a vision and strategy to give direction and guidance for future planning and investment for the next 20 years, setting as it does the Council's intentions and aspirations for this area.
- 4.113 In doing so it sets a vision that is broadly consistent with the DF agreed with the DoE post the BMAP hearing in stark contrast to the restrictive land use zoning recommended by the PAC.

**LCCC – Preferred Options Paper, Local Development Plan**

- 4.114 LCCC has subsequently reinforced its vision for lands at Blaris in seeking to progress a new Local Development Plan to guide development across its boundaries over the period to 2030.
- 4.115 LCCC issued its Preferred Options Paper as the initial stage of production of its local development plan in March 2017.
- 4.116 The POP repeatedly highlights LCCC's WLDF 2015. It confirms that it is a statement of the Council's vision and aspirations with West Lisburn highlighted as a location for wider regeneration and growth and Blaris specifically forming a natural expansion to the city.
- 4.117 The POP (page 40) affirms that the WLDF identifies some 80 hectares of land at Blaris as being suitable for residential development (Map 5, Zoning WL10).
- 4.118 At page 49 it states:

*“The current Major Employment Location at West Lisburn/Blaris has been identified as supplying a*

*suitable site for both employment and housing. These lands are currently zoned in the existing development plan (BMAP) for employment and have also been identified in the West Lisburn Development Framework 2015.*

*This area represents a prime location and is currently located within the Lisburn City development limits and located close to the key transport routes. Developers would be responsible for contributing to the funding of the Knockmore link road which would open up better accessibility to the West Lisburn area.*

*This key strategic site offers the most suitable opportunity for further expansion of housing growth over and above what is currently contained on committed and zoned housing sites.”*

- 4.119 The POP establishes LCCC's preferred option for facilitating future housing growth across its settlement hierarchy (Option 2a, page 50). That focuses future growth in Lisburn city with limited dispersal in the remaining settlement hierarchy to recognise the importance of Lisburn city as a centre for housing growth and that the growth of West Lisburn will support development of the Knockmore link as a key piece of infrastructure.
- 4.120 It proposes that the existing BMAP employment zoning at West Lisburn/Blaris be re-designated to allow up to 50% of this zoning to be allocated for housing. It confirms that approximately 1000 additional housing units at West Lisburn/Blaris could be accommodated during the Plan period to 2030.
- 4.121 It again reinforces that the proposal supports the development of a key piece of infrastructure, the Knockmore link, and allows for integrating housing land with public transport, in particular the proposed new Rail Halt and Park & Ride facility at Knockmore. This, it affirms, will contribute to reducing the need to travel by car and encourage the use of public transport.
- 4.122 The POP further references the West Lisburn Development Framework at its page 74 together with the WLDF zoning plan on page 75.
- 4.123 It quotes the WLDF vision for West Lisburn:

*“To realise the potential of the West Lisburn area by*

*2035 through setting a framework that recognises and promotes the regionally significant features contained therein and connects these features in a sustainable manner that will promote social and economic growth and prosperity for the entire region”*

4.124 It also confirms that the vision will be achieved through the implementation of the following strategic objectives:

- *Prioritise the development of the Knockmore Link Road as the key piece of infrastructure required to unlock the development potential of West Lisburn;*
- *Improve existing and develop new integrated multi-mode transport infrastructure into and throughout West Lisburn;*
- *Promote new and expand existing employment uses in the West Lisburn area;*
- *Promote and encourage appropriate development at the Maze Lands site to reflect its status as a Strategic Land reserve of regional importance;*
- *Encourage the development of new residential development to support growth in the area, whilst respecting existing settlements;*
- *Protect and enhance significant and valuable landscape areas and waterways;*
- *Protect and enhance the ‘Regional Significance’ of Sprucefield and expand its retailing role; and*
- *Increase sport, recreation and leisure activity in the West Lisburn area, with a particular focus on the River Lagan corridor.*

4.125 The POP sets out its further preferred option (Option 6A, Page 79) to re-designate the Blaris Major Employment zoning as a Mixed Use site, reclassifying the site to include a proportion of land for housing (no more than 50%) to facilitate development of the Knockmore Link Road.

4.126 In doing it is reasoned that Lisburn’s strategic location at the meeting point of key transport corridors comprises both a strong housing and employment base.

4.127 It further affirms that the surplus of employment land identified for the Council area and the ambition of the Council to implement the key road scheme – the Knockmore link – housing is an appropriate element of the mix of uses at Blaris.

4.128 It confirms that such re-designation is in keeping with the Council’s Masterplan for West Lisburn and the Maze lands and with the thrust of the RDS for directing mixed use development towards sites which will enhance local regeneration initiatives (SF1).

4.129 In addition it supports the regional strategic policy approach identified in the SPPS for promoting opportunities for mixed use development where this would create synergy and underpin the economic viability of the development as a whole

## 5 Policy Consideration and Compliance

5.1 There are a number of planning policy considerations to be assessed in determining these planning applications. Principal among these include:

### Development Plan context:

- Lisburn Area Plan 2001;
- Draft BMAP 2015;
- Belfast Metropolitan Transport Plan 2015;
- LCCC's West Lisburn Development Framework; and
- LCCC's Preferred Options Paper for its new Local Development Plan 2030.

### Policy Considerations

- Programme for Government 2011-2015 and the Executive's Economic Strategy;
- Regional Development Strategy;
- Strategic Planning Policy Statement;
- PPS2 'Planning and Nature Conservation';
- PPS3 (Access, Movement and Car parking);
- PPS4 (Planning and Economic Development);
- PPS4 (Clarification of Policy PED 7);
- PPS6 (Planning, Archaeology and the Built Heritage);
- PPS7 (Quality Residential Environments);
- PPS8 (Open space, sport and outdoor recreation);
- PPS12 (Housing in Settlements);
- PPS13 (Transportation and Land Use);
- PPS15 (Planning and Flood Risk); and
- PPS16 (Tourism).

### Local Development Plan context

- 5.2 Major lateral expansion of the city of Lisburn at Blaris has been the subject of a chequered planning history extending across some 20 years.
- 5.3 That has included the principle of major mixed use development in this location being enshrined in Lisburn Borough Council, Lisburn City Council and more recently Lisburn and Castlereagh City Council published strategy documents to articulate its vision for the future development of this part of the city.
- 5.4 The broad principle of expanding the city limits to take in lands at Blaris has been confirmed through the successive stages that the preparation of BMAP reached.
- 5.5 The draft Plan issued in 2004 included most but not all of the subject lands but restricted its land use to that of a Major Employment location.
- 5.6 It was the subject of objection by the Blaris Development Partnership (a JV of Snoddons and Killultagh) which sought inclusion of an expanded area beyond that identified in the draft Plan within revised settlement limits for Lisburn and for these to be zoned as a strategic mixed use zoning to include a campus style business park and a new residential neighbourhood.
- 5.7 The draft Plan failed to recognise the natural constraint to development that is provided by the River Lagan floodplain and instead restricted the development limit to the M1-Knockmore link road alignment.
- 5.8 In doing so it did not anticipate the need for further infrastructural linkage to the west of this road to connect to the regionally important Maze Long Kesh site which these applications make provision for with the road designed to facilitate a future link road to connect to the new roundabout linking MLK to the M1-Knockmore link road.
- 5.9 The subsequent strategic issues hearing heard evidence of the need to identify a greater amount of housing across the Belfast Metropolitan Area with an uplift agreed by DoE of some 12,000 additional units.
- 5.10 As part of a wider assessment of housing distribution

- it prompted a reconsideration by the DoE that the Blaris lands should be re-designated as a Major Mixed Use development site with broadly equal amounts of employment and housing land and agreed this should extend from that identified in the draft Plan to reflect the expanded area argued for by the Blaris Development Partnership.
- 5.11 They further agreed that a Development Framework should be prepared to guide future development in the area.
- 5.12 Subsequent to the close of the Public Inquiry sessions in December 2007 there was considerable engagement between the Blaris Development Partnership’s team and DoE Strategic Projects in developing the requisite Development Framework for the entirety of the revised zoning.
- 5.13 Collaborative discussions took place in the period from February 2008 to the end of 2008 when a draft Development Framework was submitted for comment and review. This was then followed by a series of workshops in the period February to July 2009. A final Development framework was endorsed by the Director of DoE Strategic Planning in March 2010, in writing, without prejudice to the outcome of the PAC findings on the BMAP Inquiry process and subject to testing through the normal planning application process.
- 5.14 The PAC subsequently produced its report in Spring 2012. Their recommendations on the wider Blaris lands were significantly at odds with what was agreed in principle with the Department during and after the BMAP proceedings.
- 5.15 The PAC did not accept that the development limits should be extended beyond what the draft Plan had identified. They also disagreed that there should be any residential development within the Blaris zoning, recommending that it should be zoned as a major employment location, as proposed in draft BMAP.
- 5.16 Unfortunately agreement on the Blaris Development Framework coincided with the deepest and most difficult property crash ever experienced on these islands.
- 5.17 The financial climate in the early years of this decade ensured that major investment projects such as that which had been promoted at Blaris through the plan process for the best part of ten years, going back to the notice of intention to prepare the BMAP back in 2001, simply came to a halt.
- 5.18 Plainly, the agreement struck with the DoE at the BMAP Inquiry and subsequently with the Development Framework endorsed in March 2010 unequivocally, at that time, established the acceptability of the principle of major mixed use expansion of the Blaris lands.
- 5.19 The missing piece of the jigsaw was the submission and positive determination of planning applications to give effect to the land use principles established in the Development Framework of October 2009.
- 5.20 The political and planning regime in Northern Ireland has of course changed substantially in recent years with eleven new Councils responsible for determining the vast majority of planning applications and for bringing forward local Development Plans to guide future development across their administrative boundaries.
- 5.21 LCCC has published its vision for the Blaris lands as part of its 2015 West Lisburn Development Framework.
- 5.22 The Council’s POP (March 2017) identifies its desire to see Blaris re-designated as a major mixed use zoning and to secure the early delivery of the M1-Knockmore link road. Securing this vital piece of new infrastructure is confirmed as a priority project for the Council.
- 5.23 In October 2019 LCCC published its draft plan strategy which is the subject of a public consultation period running from November 2019 to January 2020.
- 5.24 That confirms the development of lands at Blaris as a strategic mixed use site including an allocation of 1350 houses over the current LDP plan period to 2032.
- 5.25 Its Map 7 (p79) suggests a development limit of the M1-Knockmore link road which does not reflect the natural developable extent provided by the River Lagan floodplain, the western future road link connection allowed for to MLK, the Council’s own vision expressed in its WLDF 2015 for major mixed use development in this location or indeed the

agreement on a development framework reached by DoE Strategic Projects and the former Lisburn City Council in 2010 on which much of its WLDF is based.

5.26 It also suggests a LLPA/Linear Park which includes developable land at the site's northern gateway on either side of the proposed M1-Knockmore link road which has been identified in the 2010 agreed Development Framework and the Council's 2015 WLDF and is a fundamental part of these application proposals. The draft plan strategy will be the subject of objection by Neptune Carleton LLP and has limited wait given the early stage it has reached.

5.27 Section 45 (1) of the Planning Act (NI) 2011 requires the Council, in dealing with a planning application, to have regard to the local development plan, so far as material to the application and to any other material considerations.

5.28 That must reasonably weigh:

- the extensive wider collaborative engagement to prepare the Blaris Development Framework which was fully supported by DoE and the then Lisburn City Council;
- the subsequent PAC recommendations;
- the DoE's acceptance with no reference whatsoever to the lengthy engagement it facilitated to prepare the Blaris Development Framework; and
- the more recent expressions of the Council's long term vision for Blaris articulated in the West Lisburn Development Framework 2015, in its Preferred Options Paper of March 2017 and its draft plan strategy of its LDP 2032 which allocates 1350 dwellings to Blaris as part of a strategic mixed use designation.

5.29 The Council is required to have regard to any other material considerations.

5.30 That extends across a range of planning policy compliance and wider material planning matters including:

- sustainability and integration of major mixed-use development;

- infrastructural delivery and early construction of the M1-Knockmore link road;
- transportation connectivity and facilitating an orbital movement network around Lisburn city;
- substantial enhancements to multi-modal transport accessibility including circular bus services, park and ride, park and rail, cycling and pedestrian integration;
- improvements to freight management and accessibility from established employment areas to the strategic movement corridors of the M1/A1 and notable relief to the city centre and its surrounding road network;
- social inclusivity through enhanced accessibility to future job creation;
- substantial economic benefit in terms of investment, job creation and wider benefit to the local and regional economy;
- providing a catalyst to unlock major economic growth whilst achieving a highly compact urban form; and
- the linkage that the M1-Knockmore link road can facilitate to unlock the true potential of the nearby Maze Long Kesh site.

5.31 These wider material planning considerations are addressed further below.

### **Regional Development Strategy 2035**

5.32 The RDS sets a vision for development across the region in the period to 2035, providing a strategic context for where development should happen.

5.33 It promotes strong and sustainable growth with a focus on the Belfast Metropolitan Urban area as the principal gateway to the province and with a need for strong and vibrant cities at their core, driving much of the economic growth.

5.34 It places a focus on larger urban centres and regional gateways to take advantage of their locations on the regional transport network. It confirms the importance of having strong and vibrant cities to ensure that the wider region is successful.

- 5.35 Delivering a well-planned and sustainable expansion of the city of Lisburn at Blaris will allow these key aims of regional policy to be achieved.
- 5.36 A key element of that is to deliver a balanced approach to transport infrastructure. That includes amongst other things improving connectivity, enhancing public transport infrastructure including multi-modal facilities and park and ride sites to encourage motorists to take the bus or train for the main part of their journey.
- 5.37 It also includes the movement of freight and improving access to our towns and cities, including providing transport solutions to growth areas which are economic drivers of our region as these require particular solutions that address congestion and ensure the free movement of people and goods.
- 5.38 All of these policy aspirations are secured through the lateral expansion of Lisburn to connect the established limits at Sprucefield to Moira Road and release the lands at Blaris for major mixed use development.
- 5.39 This will vastly enhance connectivity in and around Lisburn and enable much improved movement of people and freight from the strategic transport corridors of the M1 and A1 through the introduction of the M1-Knockmore link road and connecting to a future link to Maze Long Kesh, to the proposed Knockmore rail/park and ride facility and to established businesses at Knockmore and Lissue.
- 5.40 The RDS seeks to manage housing growth to achieve sustainable patterns of residential development.
- 5.41 Housing is recognised as a key driver of physical, economic and social change in both urban and rural areas.
- 5.42 Strategic planning (RDS; SPPS) places emphasis on the importance of the relationship between the location of housing, jobs, facilities and services and infrastructure. That is deemed to be highly important in order to achieve sustainable patterns of land use and planned growth.
- 5.43 The realisation of the new M1-Knockmore transport infrastructure proposed at Blaris can only be achievable by securing sustainable and value generating land uses that will deliver the necessary land value that will be capable of raising sufficient capital to fund this expensive early up front and necessary infrastructure.
- 5.44 Delivering new housing as part of the sustainable mix is essential to realising early land value to create the necessary funds needed to provide the necessary new transport infrastructure improvements.
- 5.45 It is also vital in its own right as an enabler of economic growth in this location where there is a strategic and sustainable opportunity to integrate housing, infrastructure and access to employment as well as new local services and facilities.
- 5.46 Despite the lands having been identified for major employment use in the draft BMAP there has been no serious interest in that being realised over a 16 year period because of the need to plan, design and construct the M1-Knockmore link road.
- 5.47 In other words, the draft BMAP aspiration of identifying a very large planned growth area solely for employment use has not been attractive to the market with no development having occurred on the site with the exception of an initially conceived 'stop-gap' park and ride.
- 5.48 It is a well established strategic planning principle that major urban expansions are best planned where they seek to embrace an integration of housing, jobs, facilities, services and infrastructure. That is recognised in both the RDS and the Strategic Planning Policy statement.
- 5.49 Doing so allows for the opportunity to make provision for high quality housing that will attract and retain skilled workers whilst reducing the need to travel by creating the opportunity to live closer to one's place of work but also to plan in a holistic way that best sustains the complementary community facilities and services that are needed to make a place function best physically, socially, economically and environmentally.
- 5.50 In that regard these proposals for Blaris provide an opportunity for concentrated and contained rather than sprawling development.

- 5.51 By virtue of the proposed scale and careful design principles it proposes an integrated 'holistic' expansion that encourages and accommodates a highly sustainable pattern of living, working and spending leisure time.
- 5.52 The RDS specifically promotes urban economic development at key locations throughout the BMUA to ensure sufficient land is available for jobs.
- 5.53 It confirms that these should be planned in a way that recognises the roles that the component parts play, builds on planned regeneration initiatives and maximises the use of existing and planned infrastructure projects, including public transport.
- 5.54 It confirms that land at West Lisburn/Blaris is one of four key locations for economic growth.
- 5.55 The proposed planned development at Blaris will bring forward the initial phases of development for West Lisburn/Blaris and in doing so will deliver across many of the primary strategic planning themes articulated in the RDS.
- 5.56 That is plainly evident in terms of how it reflects and will deliver upon both the regional guidance and spatial framework guidance.
- 5.57 It represents strong sustainable growth in this location that will strengthen Lisburn's status as a vibrant city within the Belfast Metropolitan Area and a key driver for the wider region.
- 5.58 It offers improved health and well-being with access to services and facilities, strong new job creation potential and a highly attractive parkland setting where multi-modal public transport opportunities are all within easy reach.
- around the city, reinforcing previous infrastructural investment in the city as part of the north Lisburn housing expansion and the construction of the north Lisburn feeder road in 2008.
- 5.61 Development of the city has already extended west of Blaris, taking in the commercial and industrial land uses located off the Moira Road at Lissue and to the south west, with the establishment of Sprucefield Park and the Sprucefield Regional Shopping Centre.
- 5.62 Developing the lands at Blaris represents a logical lateral expansion of the city that will connect key movement corridors of M1/A1 to the wider city. This will create a more compact city form, allowing major mixed-use development that will fuse together a vital and viable synergy of land use whilst ensuring there are multi-mode sustainable travel means to move within and around the location.
- 5.63 The M1-Knockmore link road has been specifically identified in both BMAP and its sister document the BMTP since 2004.
- 5.64 The delivery of the road is critical to opening up the wider planned growth of this key location.
- 5.65 It will enable much improved connectivity around greater Lisburn through creation of an orbital movement network that will facilitate future connection to the regionally important land asset of Maze Long Kesh, to the planned new rail halt and park and ride at Knockmore and provide the opportunity for enhanced circular bus services connecting to and from the city centre.
- 5.66 That offers the prospect of much improved public transport services connecting Sprucefield, Blaris, Brokerstown village, Thaxton village, Lisburn feeder road and Lisburn city centre's bus and rail stations.

### **Sustainable new Transport Infrastructure**

- 5.59 The proposed development will deliver a long identified and needed new road link to connect the strategic M1 and A1 movement corridors to the north and north-west of Lisburn.
- 5.60 The need for a link road connecting from the M1 Junction 8 to Moira Road/Knockmore Road has long been desired to facilitate an orbital road network
- 5.67 It will bring considerable benefits to the operation of the road network and relieve routes around the city centre, notably the southern feeder road made up of Queens Road, Laganbank Road, Grosvenor Road and Thiepval Road.
- 5.68 Other main roads that will benefit include Belfast Road and Belsize Road while linkages to Knockmore/Lissue will significantly improve capacity on Longstone Street and Moira Road.

- 5.69 The proposal will also enhance the level of park and ride provision in this location with the existing park and ride facility at Junction 8 of the M1 retained and expanded to facilitate a capacity of some 700 vehicles.
- 5.70 That in itself will reinforce the sustainability of the location as it takes direct access to the extended hard shoulder bus lane measures that are presently being put in place on the M1 approach to Belfast.
- 5.71 The link road will make a significant improvement to the Lisburn network, providing immediate access from the M1 and A1 corridors to the established employment and industrial land uses at Knockmore and Lissue which in turn will bring tangible relief to road capacity in and around Lisburn city centre by removing high volumes of traffic, particularly HGV traffic, from the city centre.
- 5.72 It will service this wider urban economic development growth location to enable it to be marketed as a major business destination and attract major investment and vital new job creation alongside the promise of a high quality mix of new homes and complementary services and community facilities.
- 5.73 The sustainability of the location will be further reinforced by integration with the existing national cycling network and creation of a new River Lagan park that will extend the Lagan corridor to include the Blaris lands and through additional future extensions anticipated by LCCC continue through Lisburn City Centre and onwards to Belfast city centre.
- 5.76 The vision for Blaris is to create an extremely high quality lateral expansion of Lisburn city that will provide substantial and tangible benefits for the city as a whole. It will offer the opportunity to live and work in a sustainable location with the potential to assist in reducing the need to travel by private car.
- 5.77 It will contribute to creating more sustainable patterns of development, located in the right place with well-planned infrastructure including access to a range of facilities.
- 5.78 That will include a range of accessible multi-modal means of public transport, including circular bus services, park and ride, park and rail and walking/cycling integration.
- 5.79 The underpinning objective is to create a distinctive new neighbourhood with a strong sense of character and sense of place which will quickly become established as one of the most attractive and desirable places to live, work and enjoy leisure time within Lisburn and Northern Ireland as a whole.
- 5.80 Blaris will provide a range of quality new homes and exciting new job creation for the city.
- 5.81 There is the potential within the planning applications to deliver some 754,000 sq.ft of a variety of business and employment use, some 1300 new dwellings and creation of an extended riverside parkland extending the current towpath through the site and allowing for walking and cycling along this attractive Lagan Valley Regional Park corridor.

**Sustainable co-location of major land uses**

- 5.74 The provision of homes and investment in communities to promote prosperity and enable access to employment increasingly goes hand in hand.
- 5.75 The planned lateral expansion of Lisburn at Blaris will enable a highly sustainable expansion of the city that will deliver a vitally needed new road corridor, the M1-Knockmore link road, whilst positively integrating major new places to live, work and take leisure time where these can avail of ease of accessibility to the strategic transport network and to planned and enhanced public transport linkages.
- 5.82 Established mature vegetation to the western edge of the site, north of Blaris Road, will be extended with substantial new planting to reinforce the landscape character and this will be further reinforced by a planted edge to the housing planned to the west of the M1-Knockmore link road.
- 5.83 It anticipates a high quality business environment aimed at attracting significant knowledge and inward investment companies including R&D, high technology based companies, call centres and light industrial units within a landscaped campus environment of a very high quality to attract a variety of floorspace users.



- 5.84 The potential breakdown of uses extends to over 750,000 sq.ft of indicative floorspace to include office, hotel, restaurant/pub, business/industry and mixed use neighbourhood facilities including local retail, healthcare and community services.
- 5.85 The proposed residential neighbourhood anticipates semi-detached, detached, townhouses and apartments across a range of densities and within areas of distinct and varying character.
- 5.86 Affordable housing will be provided as part of the overall housing mix. The applicant is committed to delivering up to a maximum of 10% of the total dwelling yield within the outline application site. The detail of this will be the subject of discussion as part of the section 76 agreement to be negotiated with LCCC.
- 5.87 Securing the right housing offer is essential to attracting and retaining a skills base that will encourage inward investment.
- 5.88 Aligning housing and economic development together with enhancements to the wider transport infrastructure and public transport offer provides the opportunity for enhanced social inclusion and can assist in tackling problems of deprivation.
- 5.89 Community services and facilities focused around Blaris Road will act as a 'high street' and to include food retail, leisure, service, office, health, community and other non-residential floorspace. This will enable the community services to be integrated both functionally and physically where they can be supported by the emerging new housing and businesses.
- 5.90 The concept masterplan provides for a strongly interconnected network for built development with a focus on place making and creating character within the development through best integration of the site's mature landscaping features as well as reinforcing these through the introduction of new tree belts, wetland areas and amenity and wildflower grassland, particularly along the River Lagan corridor

## Substantial Economic Benefit

- 5.91 The last published Programme for Government in NI placed a focus on the creation of more jobs, more people in work, a better educated and more highly skilled workforce, a healthier population and a competent and confident well-educated and more highly skilled workforce, enhanced economic infrastructure, developing the Green economy and growing the private sector. The Blaris proposals will make substantial contributions across all of these areas.
- 5.92 The proposed development will generate significant economic, environmental and social benefits. It will generate significant benefits to the local construction industry and the local economy as a consequence of the level of investment that is involved. That will exceed £250million in construction investment alone.
- 5.93 It is estimated the construction phase of the wider mixed use expansion has the potential to create some £194million of regional Gross Value Added (GVA) to the economy, generating 205 direct jobs and a sustaining a further 125 indirect jobs.
- 5.94 The construction of the M1-Knockmore link road is projected to generate some 76 direct jobs and sustain a further 46 in contributing some £6.8million to the regional economy. It will be delivered as part of a single contract and form the initial phase of development.
- 5.95 Favourable consideration of these planning applications by summer 2020 offers the opportunity for LCCC to secure its priority infrastructural project, the M1-Knockmore link road, on the ground by spring/early summer 2022.
- 5.96 When fully completed the proposed development is anticipated to yield annual rates to LCCC of some £2.3million per annum.
- 5.97 It should be noted while these construction phase benefits are presented at a Northern Ireland regional level, it is likely that the Lisburn and Castlereagh City Council area will enjoy a sizeable proportion of the benefits as a consequence of jobs created, income generation and increased spending power within the area.

5.98 It is clear therefore that the proposed developments will deliver very substantial economic benefits.

**Strategic Planning Policy Statement**

5.99 The Blaris proposals embrace and deliver upon many of the primary land use aspirations and policy objectives of the SPPS.

5.100 They will secure the orderly and consistent development of land whilst furthering sustainable development and improving well being.

5.101 They will contribute to a more socially, economically and environmentally sustainable Northern Ireland warrant a positive and proactive approach to their determination.

5.102 The SPPS encourages local planning authorities to make positive change on the ground and that they should prioritise timely and predictable decision making that contributes to shaping high quality sustainable places to live, invest, work and spend leisure time in. These are all underpinning elements of what is proposed by the Blaris proposals.

**Sustainable development**

5.103 In furthering sustainable development it is clear that managing housing growth must be achieved in a sustainable way.

5.104 The SPPS places particular emphasis on the importance of the inter-relationship between the location of local housing, jobs, facilities and services and infrastructure, in addition to integration of transport and land use generally in order to improve connectivity and promote more sustainable patterns of transport and travel.

5.105 It is difficult to conceive of another planning application in recent years within Northern Ireland which seeks to achieve such a sustainable land use mix and investment in transport and wider community infrastructure to the extent that is anticipated at Blaris.

5.106 LCCC must weigh up the development plan context and all other material considerations.

5.107 The SPPS directs it to apply the guiding principle that in determining planning applications sustainable development should be permitted, having regard to the development plan and all other material considerations, unless the proposed development will cause demonstrable harm to interests of acknowledged importance.

5.108 It also encourages it to take a positive approach to appropriate economic development proposals.

5.109 In that regard the Blaris proposals embrace all three pillars of sustainable development, namely the needs and aspirations of our society, on the economy and on the environment.

5.110 They will enable continued economic recovery and balanced employment growth by offering the opportunity to attract a range of new employment to this strategic location where such users can be set within a very high quality of landscaped campus style environment.

5.111 They will facilitate sustainable housing growth and offer the opportunity to provide high quality housing near to proposed transport infrastructure enhancements and planned new employment which will assist to retain and attract workers in this location. It will also be planned in an area where there is a focus on developing supporting services and community facilities for those who will live and work there.

5.112 They integrate major housing, major employment and major transport infrastructure each of which is a key economic development element in itself given the construction and operational benefits so the wider economy that each generates. In doing they respect the natural environment with a new bio-rich parkland proposed as a principal element of an overall landscape strategy to create a very high environmental quality throughout the new neighbourhood.

5.113 The SPPS is clear that large scale investment proposals with job creation potential are to be given particular priority by local planning authorities. It specifically tasks planning authorities to recognise and encourage proposals that could make an important contribution to sustainable economic growth when drawing up new plans and taking decisions.

5.114 That suggests a positive view should be taken of major planning applications that are brought forward in advance of the LDP having been through its various stages of preparation where it is judged to be in the wider public interest to do so.

5.115 The Planning Act requires that the determination of planning applications must be made in accordance with the development plan unless material considerations indicate otherwise.

**Prematurity**

5.116 The timing of the new development plan is clearly a relevant factor because if the Plan is at an early stage a refusal on grounds of prematurity can seldom be justified where a draft Plan has yet to be submitted for examination. The lands at Blaris have previously been endorsed for development in the DoE agreed Development Framework, in the LCCC non-statutory WLDF, in its POP and in very large part endorsed within their draft Plan strategy 2032.

5.117 A refusal on prematurity grounds would sterilise a recognised area for growth of Lisburn city which would not be in the interests of land management and proper planning. It would inhibit early achievement of the Councils priority project – delivering the M1-Knockmore link road; inhibit the ability to attract investment and jobs to the area and inhibit the planned growth and construction of necessary new housing where it can reinforce the primary city within the Council boundaries and all of its service base.

5.118 It follows therefore that the Council as decision maker is bound to have regard to the timescale of events in relation to the Blaris development proposals which in itself is a material consideration in its weighing up.

**Material Considerations**

5.119 The decisions on the full planning application for the M1-Knockmore link road and the outline application for a major mixed use new neighbourhood require an assessment of planning judgment.

5.120 They will deliver key elements of the LDP’s preferred vision for strategic mixed use growth and the construction of the priority M1-Knockmore link road at Blaris that the Council has already firmly established

through its POP and previously through its West Lisburn Development Framework.

5.121 The effect of approving both applications would be to bring forward the realisation of the vision that the Council themselves have already set out. That would see their priority project, the M1-Knockmore link road, designed and constructed and in place well before the LDP process concludes.

5.122 In this case what is proposed is realisation of plans to deliver the principal major mixed use growth area within the wider LCCC boundary area, consistent with the Council’s vision for this strategic location.

5.123 Doing so will achieve a highly sustainable integration of land uses as part of a lateral and logical expansion of Lisburn city. This has been comprehensively planned and will ensure that there is no prejudice to the future development of wider lands to the east.

5.124 It delivers a priority infrastructure project, the M1-Knockmore link road for the city and the wider region, to be constructed in a single contract and open for use as early as Spring/Summer 2022.

5.125 This key link road will connect the strategic movement corridors of the M1 and A1 to wider Lisburn and truly open up the prospect of securing substantial investment in a mix of major employment opportunities and high quality new housing, which in itself is a critical economic driver.

5.126 It will be designed to offer a further opportunity to extend a future link road from the MLK site to tie in with the dual carriageway status of the first leg of the new M1-Knockmore link road.

5.127 It enables orbital transport movements around the wider Lisburn area, thereby offering the prospect of circular bus services linking main attractors from the city centre to Sprucefield, Blaris, and the Knockmore rail halt serving key routes around the city.

5.128 The new M1/Knockmore Link Road will complete an orbital ring road around a significant part of Lisburn linking the A1/A101 to the west and north.

**Committed Junction Improvements**

5.129 A range of road infrastructure improvements have already been delivered and are programmed to be delivered around the west and north of Lisburn. The North Feeder Road (A513) was completed as part of the LD4 lands and significant junction improvements are programmed to be delivered along Knockmore Road and Prince William Road. The junctions to be improved are listed in order of delivery as follows:

- **Knockmore Road / Ballinderry Road Junction**

5.130 The existing junction is a priority staggered cross roads. It is agreed to signalise this junction to improve capacity and safety. The junction will have significant improvements with additional lanes, islands and facilities for pedestrians and cyclists. The new layout for this junction has been agreed with DFI Roads and the detailed designs are being finalised for road licence, tender and construction. This junction has been delivered by the developers of the southern LD1 lands and is now in operation.

- **Knockmore Road / Prince William Road Junction**

5.131 The existing junction is a signalised T-junction which becomes reasonably congested at peak times. It is agreed to provide additional lanes and enhancements to this signal junction to improve capacity and safety. The junction will also have significant improvements with additional lanes, islands and facilities for pedestrians and cyclists. The new layout for this junction has been agreed with DFI Roads and the detailed designs are being finalised for road licence, tender and construction.

- **Ballymacash Road / Prince William Road Junction**

5.132 The existing junction is a priority staggered cross roads. It is agreed to provide significant additional lanes and enhancements to this signal junction to improve capacity and safety while creating 4 lanes of traffic along the Prince William Road to tie in with Nettle Hill Road. The improvements include additional lanes at stop lines, islands and facilities for pedestrians and cyclists. The new layout for this junction has been agreed with DFI Roads and the detailed designs are

being finalised for planning in conjunction with the northern LD1 lands.

5.133 The junctions have all been modelled with updated traffic data as part of the LD1 developments and have capacity enhancements built in for future years. The improvements will provide significant highway infrastructure benefits to the network north of the M1/Knockmore Link Road.

5.134 Unequivocally, these major development proposals at Blaris represent very large scale investment proposals with overall construction and land investment over a 20 year development programme in excess of £250million.

5.135 They unequivocally are consistent with the RDS, SPPS and PfG central purpose of growing a dynamic, innovative, sustainable economy balanced with improving our society and protecting as well as enhancing our environment.

5.136 Strategic policy tasks planning authorities to guide appropriate sustainable development to the right locations.

5.137 In practice it means that the system should positively and proactively facilitate development that contributes to a more socially economically and environmentally sustainable Northern Ireland.

5.138 The Blaris proposals offer a truly sustainable lateral city expansion for Lisburn and the wider region. There are compelling material considerations that warrant a positive decision to enable a start to be made on converting a long held vision in to reality.

**Planning Policy Statement 2 (Natural Heritage)**

5.139 PPS2 sets out the Department’s policies as they relate to conservation of our natural heritage. ES Chapter 9 ‘Ecology’ addresses the planning policy context in respect of PPS2 and all related local, national and international requirements.

5.140 The ecological assessment is based on results from a suite of field surveys undertaken by Ecology Solutions in 2016 and 2017 and refreshed again as part of

further surveys undertaken in October 2019 which has confirmed that no material changes to type or condition of habitats within the application site since 2016.

5.141 Baseline ecological / nature conservation information was obtained through consulting the recognised bodies involved in nature conservation within the area. The value of the ecological features identified through those surveys are interpreted within the context of recognised methodologies and also within the overall context of the surrounding area. The habitats and species evaluations are based around the guidance issued by the Chartered Institute of Ecology and Environmental Management (CIEEM).

5.142 There are no statutory designated sites present within the immediate vicinity of the proposed development. Hydrological connectivity has been identified with Belfast Lough Open Water SPA which lies approximately 17km (straight line distance) via the River Lagan that flows through the Application Site. However, no significant adverse impacts both alone or in combination have been identified.

5.143 There are no non-statutory designated sites within the Application Site. The nearest non-statutory site is Old Warren SLNCI that lies immediately adjacent to the north east corner of the Application Site and runs along the embankment of the River Lagan. Adverse effects identified are limited to potential increases in recreation pressure from the proposed development. A mitigation strategy has been devised and no significant adverse impacts have been identified.

5.144 The Application Site itself was surveyed by Ecology Solutions based around extended Phase 1 survey methodology in September 2016 and May 2017 and updated again in September 2019.

5.145 Detailed surveys were undertaken in relation to protected species (notably bats, amphibians, breeding birds, Badgers and Otter). Assessments have also been made in relation to the likely presence of other protected species.

5.146 The revised Development Proposals present relatively limited changes to what was originally proposed and it is considered that the existing ecological faunal data obtained in 2016/2017 (presented at paragraphs 9.141-9.233 of the original ES) remains a sufficiently

comprehensive and robust baseline against which the updated proposals can be assessed.

5.147 The mitigation / avoidance measures which are inherent within the scheme, ensure that those habitats of value in nature conservation will be retained and protected.

5.148 Those habitats within the Application Site to be affected by the Development Proposals are considered to be of generally limited ecological value. Where necessary, appropriate mitigation has been put forward such that no adverse impacts would arise.

5.149 With regard to protected and notable species, the proposals, including those mitigation measures described within the ES would ensure that the favourable conservation status of these species is maintained.

5.150 There is no evidence to suggest that the proposed development would lead to a significant impact on any known protected species or ecological features of value at the international, national, county or local level.

5.151 Thus there is no reason why consent should not be granted on ecology and nature conservation grounds and it is considered that a safe consent can be granted in view of the relevant legislative and planning policy framework, insofar as ecology and nature conservation matters are concerned.

### **PPS 3 (Access, Movement and Parking)**

5.152 PPS3 and the more recent policy commentary on transportation in the SPPS promote the successful integration of transport and land use as being fundamental to the objective of furthering sustainable development.

5.153 The proposals have been the subject of a comprehensive transportation assessment that has assessed the impact of the proposed M1-Knockmore link road on the wider Lisburn network and the sustainable transport infrastructure that is promised for the wider Blaris area.

5.154 The TA included collecting extensive count information from several junction locations across the Lisburn network.

5.155 The modelling assessment demonstrates that the M1-Knockmore link road provides additional capacity to the existing transportation infrastructure and enhances multi-modal accessibility to public transport with the opportunity to provide orbital city services linking to the key attractors of Lisburn City Centre, the proposed Knockmore rail and park and ride site and intervening areas.

5.156 The proposed link road provides a significant benefit in reducing traffic volumes through Lisburn city centre and the prospect to provide enhanced bus services and encourage peak hour commuters to avail of sustainable travel modes, through bus and rail.

**PPS4 (Planning and Economic Development)**

5.157 PPS4 and the more recent policy commentary on Economic Development, Industry and Commerce set out in the SPPS promote the sustainable importance of integrating employment generation with supporting provision of transport and housing infrastructure.

5.158 PPS4 and the SPPS both promote the strong emphasis on mixed use development that is identified in the RDS.

5.159 The SPPS confirms that the planning system has a key role in achieving a vibrant economy, facilitating the economic development needs of Northern Ireland in ways consistent with the protection of the environment and the principles of sustainable development.

5.160 It suggests that major mixed use sites should be sustainable and be identified in locations that are well served by public transport, accessible by walking and cycling, have adequate infrastructure and where development can be properly integrated, in terms of land use and design, with surrounding areas.

5.161 It also advises that planning authorities should generally adopt a positive and constructive approach to determining applications for appropriate sustainable economic development informed by the provisions of the LDP, the SPPS and all other material planning considerations.

**PPS6 (Planning, Archaeology and the Built Heritage)**

5.162 Chapter 16 of the ES has assessed the impact of the proposed development in terms of both architectural and archaeological impact.

5.163 The key finding from the assessment is that the proposed development will have a very limited effect on the historic environment as a whole.

5.164 There is one archaeological asset recorded within the site, the possible partial use of an element of the site as a temporary unpaved wartime landing strip for aircraft dispersal.

5.165 The potential for any as yet unknown significant archaeological remains to be present is considered to be low. Any assets which may be present are unlikely to be of more than local importance and therefore of low value and sensitivity or of no importance.

5.166 Although there is the potential for a major magnitude of change to these assets arising from the development their level of sensitivity means that overall effects to the buried archaeological resource would be no more than slight.

5.167 The lack of knowledge of any buried archaeological potential may require a programme of archaeological works to take place in order to better understand the archaeological potential of the site. Standard conditions requiring preservation in situ or by record would result in the reduction of effect on the buried historic environment from slight to neutral.

5.168 There are built heritage assets within 2km of the site. In all but one case the proposed development will have no impact on their significance. The exception is the non-designated heritage asset of Carlton House which would suffer a minor adverse impact. This would result in a slight/neutral significance of effect to the significance of that asset.

**PPS7 (Quality Residential Environments)**

5.169 PPS7 (para 1.6) seeks to promote more sustainable patterns of living, working and travelling, more effective integration between land use planning and transport and the creation of attractive places in

which people are happy to live, work and take their leisure.

- 5.170 For developments of greater than 300 dwellings it requires the preparation of a concept master plan statement and this accompanies this planning application to explain the design vision and principles underpinning the proposed development at Blaris.
- 5.171 The residential element of the proposal specifically seeks to ensure compliance with all aspects of PPS7's QD1 policy to deliver a quality residential environment that responds appropriately to its context.
- 5.172 The criteria (a) to (i) in QD 1 will all be achieved and complied with as explained in the concept masterplan statement and in the relevant cultural heritage, landscape and visual and transportation sections of the Environmental Statement.
- 5.173 The new Blaris neighbourhood will deliver a very high quality of residential living environment with strong emphasis on local bus routes through the site and creation of a highly walkable and connected new neighbourhood with ease of access to supporting community services and facilities.

### **PPS8 (Open Space, Sport and Outdoor Recreation)**

- 5.174 For major developments of more than 300 dwellings Policy OS1 of PPS8 requires that 15% of the total site area is identified as public open space.
- 5.175 The proposed development at Blaris will comfortably exceed this policy requirement with a new riverside park and a variety of open space sequences identified as an integral part of the concept master plan.
- 5.176 The concept master plan and Landscape and Visual chapter of the ES explain the provision of open space following a detailed appreciation of the site's character and baseline context. Pages 54-57 of the revised Design and Access Statement (October 2019) further articulate the proposed open space and landscape components.
- 5.177 The proposed development will be wholly compliant with all policy requirements of PPS8.

### **PPS12 (Housing in Settlements)**

- 5.178 The approach to the location of future housing development is set by the RDS's spatial development strategy and reflects its guiding principles which are:
- Integrating housing with economic development, services, transport, and the local environment to achieve more sustainable patterns of development which make better use of resources;
  - Helping to create a more cohesive society by a balanced spread of housing across the region and a high degree of integration with the Regional Strategic Transport Network; and
  - Fostering a greater sense of community with a focus on place, the value of the individual and high quality living environments.
- 5.179 PPS12 identifies a range of criteria to be considered when selecting suitable sites for housing. That includes:
- The need for urban expansion, informed by allowances for existing commitments;
  - The physical and environmental constraints on the development of land including the need to protect environmental setting, character, natural and built heritage and constraints such as contamination, land stability and flood risk;
  - The capacity of existing infrastructure including public transport, water, sewerage, other utilities, social and community facilities (such as education and health) to absorb development without adding further financial burden;
  - The degree of integration with centres of employment, services, other facilities, public transport and other non-car modes;
  - The need to manage the encroachment of housing on existing businesses to ensure that the operation and potential expansion of such enterprises, and the retention of jobs is not impeded by the juxtaposition of new housing areas;
  - Any relevant direction or guidance on strategic urban design;

- The ability to integrate new development without detracting from the character and identity of the settlement, whilst maintaining a sense of place;
- The social and equality issues – deal sensitively with the ‘divided community’ issue within settlements for both communities;
- The need to ensure there would be no detrimental effect on residential amenity or the health of residents due to nearby land uses and activities;
- The ability to unlock major strategic development opportunities such as those offering significant employment opportunities; and
- The strategic objectives for the plan area with direct relevance to the RDS.

5.180 The proposed development at Blaris is fully compliant with the thrust of each of these planning criteria. It represents a highly sustainable integration of land use and multi-modal transport infrastructure offering realistic opportunities to travel by means other than the private car.

5.181 It will unlock what has been identified by the Council as its preferred option for major additional housing growth over and above current LDP commitments in contributing towards meeting the revised Housing Growth Indicator for housing across LCCC in the period to 2032.

5.182 It will concentrate major housing development in a highly sustainable location that will plainly facilitate a high degree of integration with existing and proposed centres of employment, community services and public transport and take advantage of existing infrastructure by delivering a new link road to connect to the strategic movement corridors of the M1 and A1.

5.183 This new infrastructure will enable future linkage to the strategically important MLK site and transform the sustainable transport opportunities and linkages between the Blaris location, wider Lisburn and beyond, embracing circular bus services, access to proposed rail halt enhancements, park and ride facilities as well as cycling and walking integration.

**PPS13 (Transportation and Land use)**

5.184 PPS13 acknowledges that the need to integrate land use and transportation is a key objective in delivering the RDS’s transportation vision.

5.185 A primary objective of PPS13 is to integrate land use planning and transport by promoting sustainable transport choices, accessibility for all and reducing the need to travel especially by the private car.

5.186 It confirms that the location and design of development has a fundamental influence on travel patterns and that in making decisions on development proposals a key aim is to integrate transportation and land use in ways which enable people to carry out their everyday activities with less need to travel and with the maximum modal choice.

5.187 This requires consideration of ways to reduce the physical separation between housing and services such as shopping, jobs, health and education facilities.

5.188 Mixed use development is recognised as being able to support sustainable transport by encouraging multi-purpose trips thereby reducing the overall distance travelled by car.

5.189 The Blaris proposals represent a highly sustainable major mixed use expansion of Lisburn that will deliver tangible enhancements to the transportation connectivity in and around the city.

5.190 It is considered that they are wholly compliant with the policy thrust of PPS13 as they embrace delivery of multi-modal public transport accessibility and offer mixed use development that will benefit from high accessibility to park and ride, circular bus services, park and rail as well as integration with existing cycling and walking networks.

**PPS15 (Planning and Flood risk)**

5.191 In line with the requirements of PPS 15, Chapter 11 of the Environmental Statements and the appended Flood Risk assessments have considered all possible sources of flooding and have taken a conservative approach in establishing the flood risk to the application sites. The information provided in the FRA’s is compliant with the requirements of Annex D of the Revised PPS 15.



- 5.192 Policy FLD 1 of PPS 15 does not permit development within the 1% AEP fluvial floodplain unless the applicant can demonstrate that the proposal constitutes an exception to the policy.
- 5.193 The development layout has been designed so that all predicted floodplain areas are avoided, with the floodplain area being used as a riverside park.
- 5.194 The levels in this area will not be raised and the flood storage capacity and flood conveyance routes will not be reduced by unsuitable planting or obstructions.
- 5.195 The only element of the development that will be within the floodplain is the link road. Exception (d) of PPS15 allows for Development for agricultural use, transport and utilities infrastructure, which for operational reasons has to be located within the floodplain.
- 5.196 The proposed road has been protected in the Belfast Metropolitan Transport Plan and in the draft BMAP as well as being identified in LCCC's West Lisburn Development Framework and Preferred Options Paper setting out its preferred options for its forthcoming LDP and its Draft Plan Strategy of October 2019. This exception can therefore be applied. The use of a bridge design to minimise the impact of flooding is a flood mitigation measure. The development is therefore compliant with Policy FLD1.
- 5.197 The planning authority will not permit development that would impede the operational effectiveness of flood defence and drainage infrastructure or hinder access to enable their maintenance. Consequently, policy FLD2 does not apply to this development.
- 5.198 Under Policy FLD3, development will only be permitted where it is demonstrated through the Drainage Assessment that adequate measures will be put in place so as to effectively mitigate the flood risk to the proposed development and from the development elsewhere.
- 5.199 The drainage design will take account of the proposed levels throughout the site so that any surface water runoff will be intercepted and will not cause localised flooding. The storm runoff from the developed site will discharge at Greenfield rate to the adjacent watercourses at a number of locations.
- 5.200 Discharge to each outfall will be restricted by a hydrobrake. Attenuation will be provided by the use of attenuation cells, oversized pipes or storage ponds. Schedule 6 applications will be made to DfI Rivers for the outfall locations at a later date. The drainage design for the site will be completed in accordance with NI Water 'Sewers for Adoption'. The system will be maintained to the required standard.
- 5.201 The risk of flooding from a drainage aspect to the proposed development and surrounding area can be considered to be low. Measures proposed in this Flood Risk Assessment provide a level of protection to reduce the impact from an event greater than a one in 100 year design event to of this magnitude as far as is reasonably possible.

### **PPS16 (Tourism)**

- 5.202 The outline planning application includes provision of a new hotel which is anticipated to extend over four storeys, located alongside a pub/restaurant. This will be located close to the mixed use neighbourhood centre at the junction of the M1 Knockmore link road and Blaris Road and will be an important addition to accommodation provision in the wider Lisburn area.
- 5.203 The concept masterplan (Figure 43 and 44, pages 49 and 51) demonstrates the location of the proposed hotel and the assessment of height scale and massing principles that are considered appropriate for its site and wider proposed setting. These parameters have been the subject of Environmental Impact assessment.
- 5.204 In policy terms PPS16 is supportive of tourism growth and new hotel proposals within settlement limits subject to scale, size and design.
- 5.205 It is considered that the outline proposal is fully compliant with PPS16 in principle. Detailed design is something that will be the subject of future assessment as part of a separate full application or reserved matters submission.

## 6. CONCLUSION

- 6.1 These planning application proposals for lands at Blaris represent a highly sustainable urban expansion of Lisburn that will logically create a compact city form and connect Sprucefield at the meeting point of the M1 and A1 transport corridors with the Knockmore road linking the south west, west and north-west of the city.
- 6.2 The location has been endorsed as a strategic location where major mixed use economic growth should be directed to. That endorsement has been at regional level (RDS) as well as through local expressions of policy (LCC Physical Development Strategies; draft BMAP; DoE agreed Blaris Development Framework; LCCC West Lisburn Development Framework; LCCC Preferred Options Paper LDP 2030 and LCCC Draft Plan strategy).
- 6.3 Facilitating sustainable development in city expansions on the scale that this opportunity presents must embrace major mixed use development in conjunction with significant enhancement to the local transport network.
- 6.4 Regional and strategic policy (RDS; SPPS; PPS12; PPS13) strongly supports and encourages sustainable major mixed use development that integrates major housing, employment and necessary community services and facilities where these can benefit from enhanced transportation connectivity and accessibility to multi-modal public transport opportunities.
- 6.5 The extent of the River Lagan floodplain at Blaris (see revised Design and Access Statement, October 2019, page 30-31) provides an effective natural containment to the western expansion of the city in this location and creates the opportunity for double fronted development to the proposed link road.
- 6.6 The floodplain is a constraint that presents a logical physical edge to the urban area of Lisburn which is reinforced by the presence of existing mature woodland to the north of Blaris Road. The masterplan seeks to reinforce this established landscape character with substantial new woodland planting.
- 6.7 It is to this defined constraint that the development limits of the city in this location were endorsed by DoE Strategic Projects, Lisburn City Council (as it then was) and all stakeholders in confirming a Development Framework for the lands in March 2010. That principle of development extent was reinforced by LCCC in their own vision for the city articulated within its 2015 West Lisburn Development Framework. It was further identified in its Preferred Options Paper of March 2017 and is again referenced in its draft Plan strategy issued in October 2019.
- 6.8 This natural constraint represents the logical western extent of the Blaris expansion lands where efficient use of the existing capacity of the land should be made to achieve sustainable economic growth in this location.
- 6.9 Securing a major mix of land uses at Blaris is vital to realise the necessary value in the land that can contribute towards the funding of the expensive infrastructural cost of the 1.6 km M1-Knockmore link road including a bridge over the River Lagan.
- 6.10 The provision of the M1-Knockmore link road is central to unlocking the growth of Lisburn city at West Lisburn and in facilitating development at Blaris and in enhancing the infrastructural network to facilitate a future road link to Maze Long Kesh.
- 6.11 LCCC has made clear its ambition to see early delivery of the M1-Knockmore link road which it has prioritised as the key piece of infrastructure to unlock the wider West Lisburn potential.
- 6.12 The applicant is committed to entering in to a section 76 agreement with LCCC to secure the necessary obligations to assist in delivering the M1-Knockmore link road but also to ensure that the wider development of the area will be secured in a comprehensive, fair and equitable manner and that there will be connectivity of roads and service infrastructure in a phased and orderly manner.
- 6.13 The Council can subsequently require wider landowners to enter in to comparable s76 agreements to secure comprehensive, fair and equitable obligations for the balance of the Blaris lands that lie outside the red line extent of these applications.
- 6.14 LCCC, in determining these applications, must have regard to the local development plan, so far as

- material to the application and to any other material considerations.
- 6.15 The development plan context has been articulated at Section 4 and 5 of this report.
- 6.16 That demonstrates the acknowledged accepted principle of major mixed use expansion at Blaris through the BMAP Inquiry and the considerable engagement and agreement reached between DoE Planning, Roads Service, the former Lisburn City Council and a very extensive range of wider consultees, agencies and stakeholders as part of a Development Framework for the Blaris lands.
- 6.17 It also articulates the tension between agreement on the broad configuration of land uses through endorsement of the Blaris Development Framework by DoE and the subsequent PAC report that recommended retention of the lands for employment purposes only.
- 6.18 It further sets out the clear vision for sustainable major mixed use development at Blaris expressed by LCCC in its West Lisburn Development Framework and reinforcement of that position in its POP and its draft Plan strategy of October 2019.
- 6.19 The case to approve these applications now rather than await a local development plan process that could take several years before it is concluded and then further additional time to prepare and determine subsequent planning applications is compelling.
- 6.20 They propose the sustainable expansion of Lisburn city and as such represent the highest category of settlement hierarchy in terms of accommodating future growth (RDS; SPPS)
- 6.21 The LDP preparation process to guide development across LCCC has been instigated by the Council with publication of its POP in March 2017 and a draft strategy plan published in October 2019. The completion of the wider process is likely to take a number of years before formal adoption.
- 6.22 The proposed M1-Knockmore link road reflects the alignment of the M1-Knockmore link road that is protected through the draft BMAP and the BMTP.
- 6.23 The concept masterplan for the proposed new Blaris neighbourhood closely reflects the Council's own vision for the area and that previously agreed by DoE, DRD and an extensive range of wider stakeholders.
- 6.24 There are compelling material considerations that cumulatively outweigh LAP / dBMAP zonings and warrant positive determination of these planning applications:
- Securing the principle of sustainable major mixed use expansion and effective use of developable land outwith the natural floodplain that will generate the necessary land value to bring forward provision of the M1-Knockmore link road;
  - Securing planning permission in by summer 2020 will accelerate the construction of the M1-Knockmore link road where this would be completed as early as June 2022, securing the Council's ambition to deliver this key piece of infrastructure as a matter of priority and secure the benefits it will deliver at the earliest possible stage;
  - The link road will generate substantial enhancements to transportation connectivity in and around Lisburn city, connecting the M1 and A1 strategic corridors to established employment locations at Knockmore and Lissue that will substantially enhance freight movement and re-distribute HGV movement away from Lisburn City centre. It will enable connectivity around the city that allow easier movement to North Lisburn feeder, Dunmurry bypass and onwards to Blacks Road;
  - Such enhancements to the transportation network will assist in improving social inclusivity in terms of accessibility to future job opportunities in the businesses that can be attracted to locate at Blaris and the necessary construction workers that will be needed to build the road, the housing, the businesses and related infrastructural works;
  - The link road facilitates orbital bus services in and around Lisburn that will connect the Blaris neighbourhood to Lisburn city centre rather

than the radial routes that exist at present;

- It will offer the opportunity to easily access the proposed new Knockmore rail halt and park and ride to the north of the site;
- It enables a future link road to connect in to the M1-Knockmore link road to connect the regionally important Maze Long Kesh site to the strategic transport network and enable it to achieve its job creation potential;
- It will facilitate a substantial expansion of the Blaris Park and Ride site to increase its capacity to over 700 spaces which will integrate with the proposed hard shoulder bus linkages along the M1 to Belfast;
- It will service this growth area and enable it to be marketed as an attractive and strategic location for businesses to invest in and choose to locate to;
- It will deliver high quality new housing at a strategic location where exciting new employment can be attracted to Lisburn to a location where people will be drawn to live, work and take their leisure; and
- It will deliver a bio-rich new Lagan parkland that will provide a very attractive leisure corridor for existing and future residents.

6.25 The proposals are fully consistent with all related planning policy for securing sustainable major mixed use expansion and economic growth.

6.26 They provide for an integration of major housing and employment land uses within a high quality landscaped setting where there is the opportunity to do so at a strategic convergence of key transport corridors (M1/A1) and to truly enhance the multi-modal offer of as wide a range of public transport as is reasonably possible (bus, rail, park and ride, cycling, walking).

6.27 They represent a major investment for Northern Ireland with:

- In excess of £250million in development and construction alone;

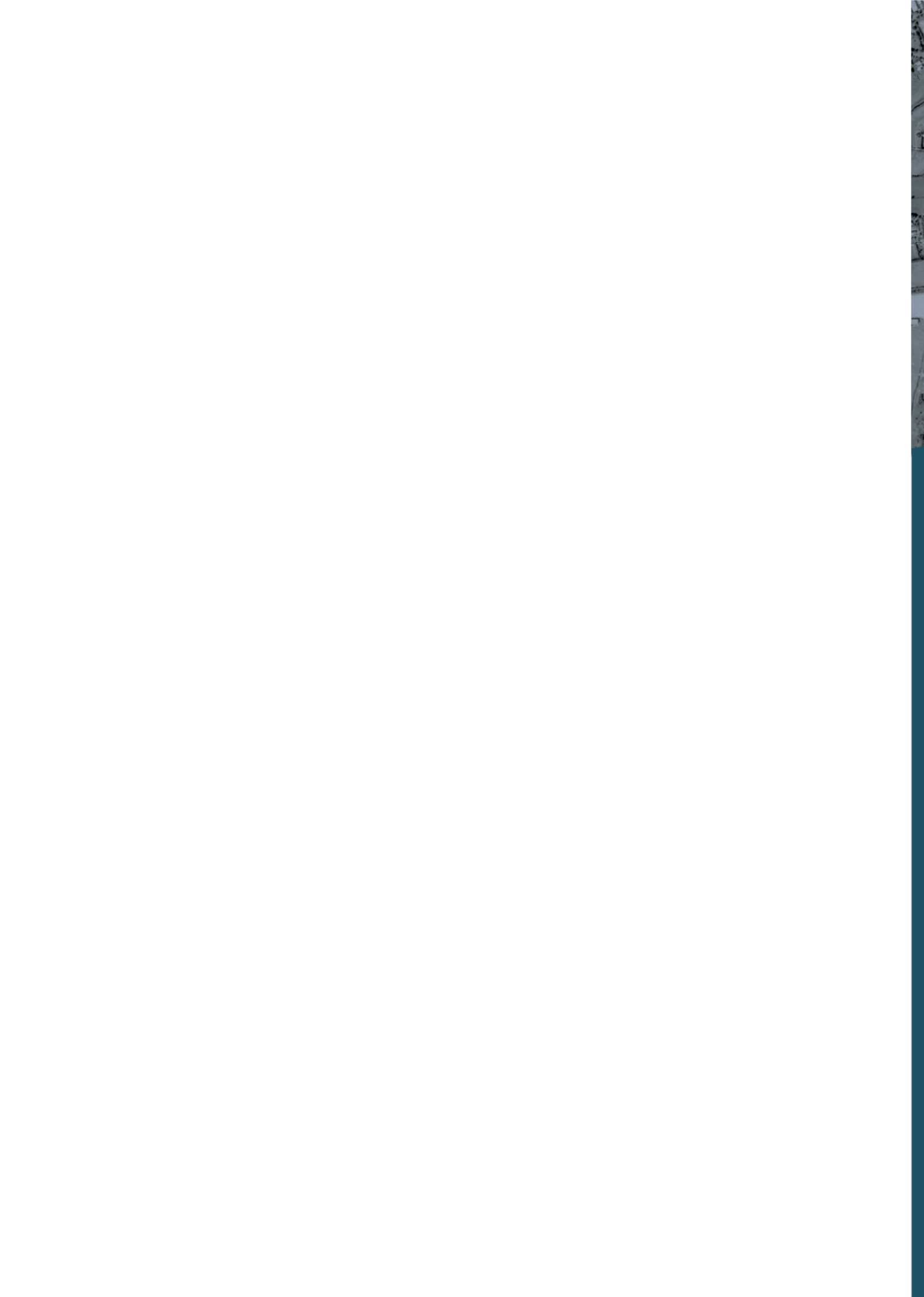
- The major mixed use expansion of the Blaris lands has the potential to deliver some 1178 jobs and a GVA of some £42.4 million per annum;
- The wider construction phase will generate some 205 direct construction jobs annually and a further 125 indirect jobs and contribute some £194million GVA;
- The construction of the M1-Knockmore link road will sustain 76 direct construction jobs and some 46 indirect jobs and contribute some £6.8 million to GVA; and
- The overall development once completed is anticipated to raise an additional £2.3million in Council annual rates income.

6.28 The planning application is accompanied by a range of supporting documentation to articulate:

- How the proposed new neighbourhood has been conceptually designed with considerable analysis in the revised Design and Access Statement;
- The full detailed design of the M1-Knockmore link road and how the transportation connectivity will deliver overall enhancement to the wider transport network as assessed in the comprehensive transportation assessment;
- How the likely environmental effects of the development have been assessed and the significance of the residual effects after mitigation measures have been accounted for;
- how the proposal meets all prevailing planning policy; and
- the extensive public consultation process undertaken prior to the planning application being formally lodged to explain the plans in greater detail, listen to people’s views and answer any questions raised.

6.29 In summary, these proposals are vital to secure the long planned economic growth of Lisburn city and to facilitate the critical and key piece of infrastructure to unlock this strategic growth – the M1-Knockmore link road.

- 6.30 Given the importance of these major planning applications they warrant a high level of priority in determining them positively. They have benefitted from a highly collaborative PAD process and meaningful public consultation undertaken through a range of exhibitions and face to face meetings.
- 6.31 LCCC should apply significant and determining weight to the material planning considerations that have been expressed above. Accordingly they should resolve to grant planning permission subject to the requisite legal agreement

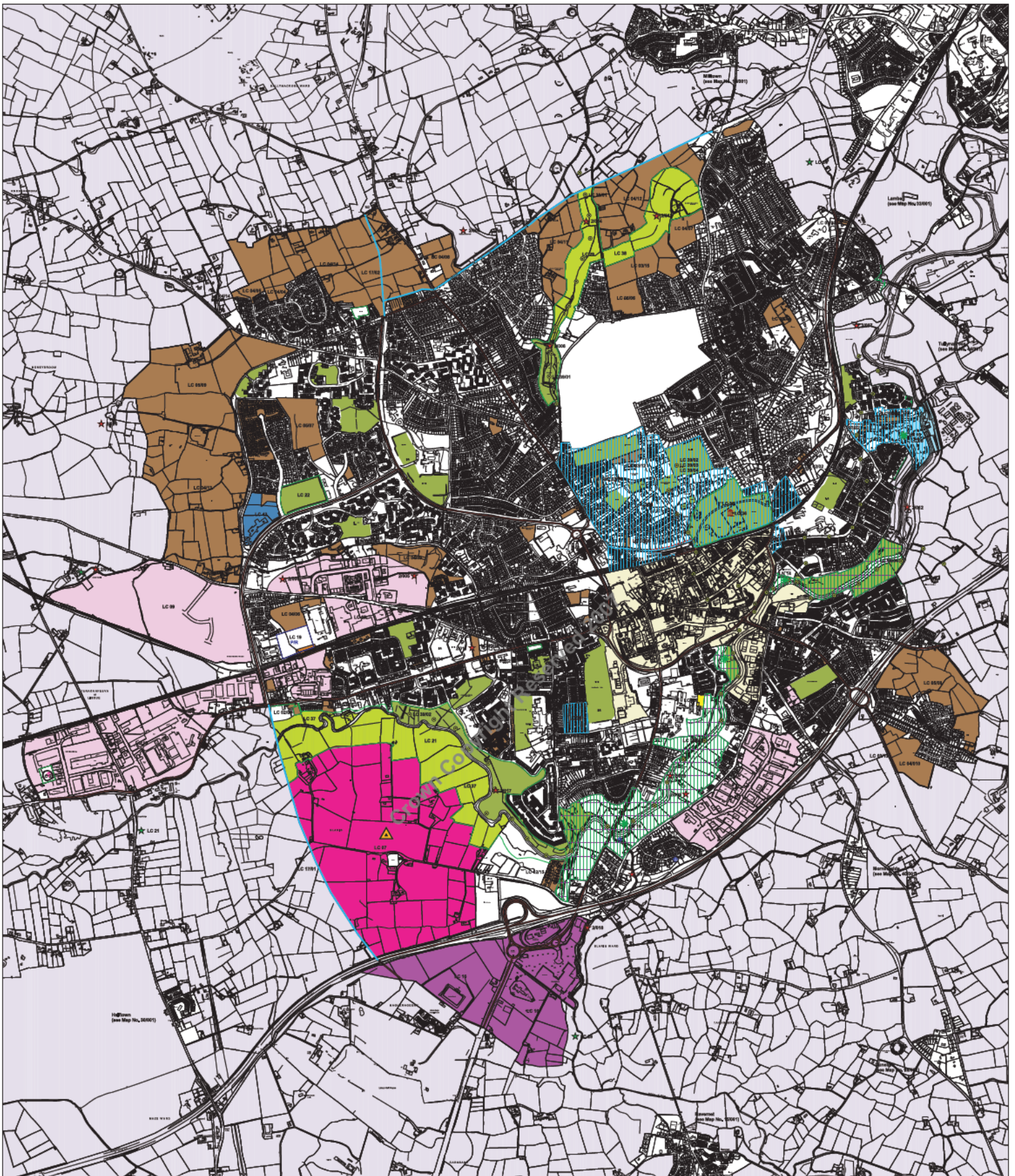




## ANNEX 1

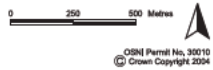


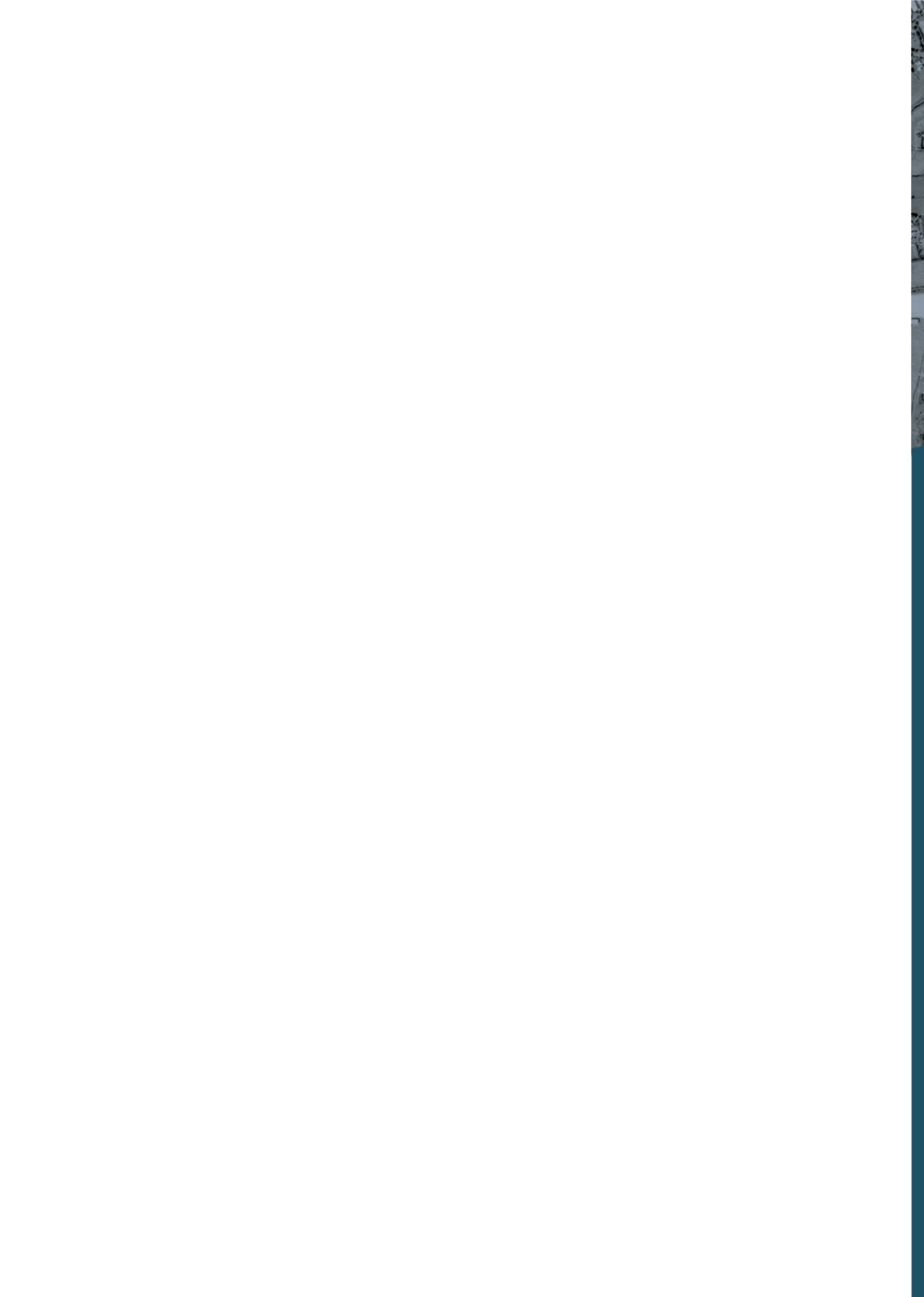




**Belfast Metropolitan Area Plan 2015 - Draft Plan**  
**Map No. 2/001 - Lisburn City**

- |   |  |   |   |
|---|--|---|---|
| <ul style="list-style-type: none"> <li> Settlement Development Limit</li> <li> City Centre (see Map No. 2/035)</li> <li> Land zoned for Housing</li> <li> Major Employment Location (see Map No. 2/002)</li> <li> Land zoned for Employment/Industry</li> <li> Major area of existing Employment/Industry</li> <li> Land zoned for Mixed Use</li> <li> Sprucefield Regional Shopping Centre (see Map No. 2/003)</li> <li> Road Proposal</li> <li> Relocated Rail Halt/Station</li> <li> Park and Ride site</li> </ul> | <ul style="list-style-type: none"> <li> Site of Local Nature Conservation Importance and Area of Constraint on Mineral Developments (see Clarification Map Nos. 2/004 to 2/018)</li> <li> Local Landscape Policy Area (see Clarification Map Nos. 2/019 to 2/028)</li> <li> Local Landscape Policy Area (see Clarification Map Nos. 2/019 to 2/028)</li> <li> Area of Townscape Character (see Clarification Map Nos. 2/029 to 2/033)</li> <li> Historic Park, Garden and Demesne (see Clarification Map No. 2/034)</li> <li> Land identified for Open Space</li> <li> Community Greenway</li> </ul> | <ul style="list-style-type: none"> <li> Land identified for Education Use</li> <li> Land identified for Health Use</li> <li> Lagan Valley Regional Park</li> <li> Lagan Valley Regional Park Node (see Clarification Map Nos. 46/085 to 46/088)</li> <li> Area of Constraint on Mineral Developments</li> </ul> | <p><b>For Information Only:</b></p> <ul style="list-style-type: none"> <li> Conservation Area (see Appendix Map No. 47)</li> <li> Area of existing Open Space</li> <li> Protected Route</li> <li> Archaeological Site &amp; Monument (State Care)</li> <li> Archaeological Site &amp; Monument (Scheduled)</li> </ul> |
|---|--|---|---|







## ANNEX 2

# **THE DEPARTMENTAL APPROACH TO THE ADJUSTED HOUSING GROWTH INDICATORS FOR THE BELFAST METROPOLITAN AREA AND BELFAST METROPOLITAN RURAL HINTERLAND (ADJUSTED 9 JANUARY 2007)**

## **1.0 BACKGROUND**

- 1.1 HGI 4 in the Regional Development Strategy (RDS) deals with the housing allocation to the Belfast Metropolitan Area and its hinterland. Figure 18 in the RDS sets out the Housing Growth Indicators (HGIs) for the BMA – 42,000, the BMA Rural Hinterland – 9,000 and the BMA Districts Hinterland – 26,500. The HGIs cover the period from the beginning of January 1999 to the end of December 2015. The BMA and the BMA Rural Hinterland make up the Plan Area of the Draft Belfast Metropolitan Area Plan (BMAP).
- 1.2 Figure 18 in the RDS also sets out the component parts which make up the BMA and the BMA rural hinterland. In order to avoid confusion of terminology the BMA is referred to in BMAP as the Metropolitan Urban Area and the BMA Rural Hinterland as the Metropolitan Rural Area.
- 1.3 The Metropolitan Urban Area is defined for purposes of allocating the 42,000 dwellings as the continuous built up area centred on Belfast and extending in an arc from Jordanstown to Knocknagoney, together with the City of Lisburn, and the towns of Bangor, Carrickfergus and Holywood.
- 1.4 The continuous built up area includes the city of Belfast and adjoining built up parts of the Districts of Carrickfergus, Castlereagh, Lisburn, Newtownabbey and North Down. These built up areas outside of Belfast are referred to as Metropolitan Areas.

- 1.5 The Metropolitan Rural Area is defined for purposes of allocating the 9,000 dwellings as those parts of the Plan Area lying outside the Metropolitan Urban Area.
- 1.6 The potential housing yield in BMAP for the Metropolitan Urban Area is 51,800, some 23% over the RDS HGI and 10,700 for the Metropolitan Rural Area, some 19% over the RDS HGI. BMAP was formulated and received a certificate of general conformity on the basis of the HGIs in the RDS.
- 1.7 In January 2005 The Department for Regional Development (DRD) published a Review of the Regional Housing Growth Indicators for public consultation. Following receipt of comments a Public Examination was held to examine the methodology used to calculate the figures in the document and the adequacy of the allocation of the figure through the draft HGIs. The Report of the Panel on the Review of Housing Growth Indicators was produced in March 2006. The recommendations included that the Adjusted total HGI for the BMA and BMA Rural Hinterland should be 66,500, an increase of 15,500 over the RDS HGI of 51,000.
- 1.8 In the Response by DRD to the Report of the Panel published in June 2006 the above recommendation was accepted. Table 1 of the Response provides a breakdown of the HGI into 54,800 for the BMA (Metropolitan Urban Area) and 11,700 for the BMA Rural Hinterland (Metropolitan Rural Area).
- 1.9 Table 1 summarises the RDS HGI, the potential housing yield in BMAP and the Adjusted HGI.

**Table 1 HGI figures and potential housing yield in BMAP**

	RDS HGI	Potential yield in BMAP	Adjusted HGI
Metropolitan Urban Area	42,000	51,828	54,800
Metropolitan Rural Area	9,000	10,646	11,700

1.10 The purpose of this paper is to set out the approach by the Department to the Adjusted HGI for the Plan Area at the forthcoming Public Inquiry. The first section deals with the approach in the Metropolitan Urban Area, the second deals with the approach in the Metropolitan Rural Area.

## SECTION 1

### 2.0 APPROACH TO THE ADJUSTED HGI IN THE METROPOLITAN URBAN AREA

2.1 The approach to the Adjusted HGI in the Metropolitan Urban Area is set out in this section as follows:

- Re-assessment of previous studies.
- Strategic Directions for future growth in the RDS.
- Other factors to be taken into consideration in the allocation of future housing growth potential.
- Approach to site specific objections
- The amount of additional housing growth potential.
- Concluding summary.

### 3.0 ASSESSMENT OF PREVIOUS STUDIES.

3.1 In addressing the issue of the location and amount of housing growth potential in the Metropolitan Urban Area in light of the Adjusted HGI the Department has firstly assessed whether any of the studies or work undertaken in association with the housing allocation process in BMAP need to be updated. This assessment is as follows:

- **Assessment of potential yield from committed housing sites and windfall.** It is considered appropriate to up-date the housing figures supplied in the Population and Housing Technical Supplement to take account of planning permissions granted since March 2003. This will also allow an assessment to be made of the reasonableness of the windfall figures and of minimum and maximum densities. Table 2 provides figures for the overall potential yield in each of the component parts of the Metropolitan Urban Area taking account of the 2006 Housing Land Availability Survey undertaken by the Department. (The Department has re-

presented the figures in the Population and Housing Technical Supplement and updated these figures to 2006. Both the re presentation of the original figures and the updated figures are available from the Department on request). Additional yield arising from development of sites outside of the urban footprints and not taken account of in BMAP is included in the updated figures. The potential housing yield in 2006 in the Metropolitan Urban Area is 2214 (4%) under the Adjusted HGI.

- **The Urban Capacity Study.** The urban capacity study undertaken as part of the BMAP process identified a significant number of sites within the urban footprints that are suitable for housing growth. Any sites not identified as part of this exercise are still able to be brought forward and will constitute windfall development. It is therefore considered there is no requirement to carry out a further urban capacity exercise.
- **Application of minimum and maximum densities.** BMAP identifies minimum densities for sites within the urban footprints which were determined following an assessment of the sites and taking into account the need to promote as much housing as possible within the urban footprints. Appendix 1 provides an analysis of planning permissions granted since March 2003 on sites zoned for housing in BMAP, within the urban footprints, which were not the subject of either a planning approval or a current planning application for housing prior to March 2003. A comparison of the densities being approved against the density figures in BMAP indicates the figures in BMAP do not need adjustment and that individual adjustments can be made in response to specific objections. Similarly on Greenfield sites a minimum and maximum density is provided in BMAP and figures for recent planning permissions given in Appendix 2 indicate the figures in BMAP do



not need adjustment and that individual adjustments can be made in response to specific objections.

**Table 2 Potential Housing Yield in the Metropolitan Urban Area**

	Potential yield in BMAP	2006 potential yield
<b>Belfast District</b>		
Belfast City Centre	2466	2870
Belfast Harbour Lands	3500	3500
North Belfast	3459	4552
West Belfast	4540	5311
South Belfast	3053	4271
East Belfast	3465	4526
<b>District Total</b>	<b>20483</b>	<b>25030</b>
<b>Carrickfergus District</b>		
Carrickfergus	3516	3755
<b>District Total</b>	<b>3516</b>	<b>3755</b>
<b>Castlereagh District</b>		
Metropolitan Castlereagh	3565	4044
<b>District Total</b>	<b>3565</b>	<b>4044</b>
<b>Lisburn District</b>		
Lisburn City Centre	118	119
Lisburn City	5357	5886
Metropolitan Lisburn	2435	2694
<b>District Total</b>	<b>7910</b>	<b>8699</b>
<b>Newtownabbey District</b>		
Metropolitan Newtownabbey	4740	5509
<b>District Total</b>	<b>4740</b>	<b>5509</b>
<b>North Down District</b>		
Bangor	4472	4899
Holywood	411	472
<b>District Total</b>	<b>4883</b>	<b>5371</b>
<b>Windfall</b>	<b>6731</b>	<b>178*</b>
<b>TOTAL</b>	<b>51828</b>	<b>52586</b>

\* This is the residual uncommitted windfall total. Windfall development granted planning permission since March 2003 is included in figures in rows above

- **Zoning of existing industrial land.** Some of the land zoned as existing industry in BMAP has subsequently been granted planning permission for housing. A significant number of sites are the subject of individual objections and will be discussed at the Public Inquiry. In light of this and the importance of existing industrial land to the overall supply of land for employment purposes it is considered inappropriate to re-examine all the remaining industrial land which is not the subject of objection with a view to re-zoning as housing.
- **BUAP Whitelands.** An examination of the BUAP Whitelands was carried out as part of the BMAP process with the result that some land is brought forward for development purposes in BMAP whilst other land is excluded from the settlement development limits due to environmental considerations. As all former Whitelands excluded from the settlement development limits are the subject of environmental designations in addition to Green-Belt in BMAP it is considered there is no requirement to carry out any further analysis. Site specific objections can be dealt with as part of the Public Inquiry process.
- **Specialist Housing Needs.** The Housing Needs Assessment carried out by the Northern Ireland Housing Executive (NIHE) was taken into account in preparation of BMAP. Whilst the requirement for additional land to meet specialist needs can be dealt with as part of the Public Inquiry into specific objections it is considered appropriate to take into account any shortfall in the level of provision.
- **Environmental Designations.** A considerable amount of land adjoining the settlement development limits in BMAP is the subject of environmental designations in addition to Green Belt. It is considered inappropriate to carry out any re-assessment of these

designations. General and site specific objections relating to these will be dealt with at the Public Inquiry.

- Windfall Potential.** It is considered appropriate to provide an indication of the level of windfall development being achieved and revise the allowance if appropriate. Table 3 contains figures regarding the yield from windfall development over the past three years. Windfall is all housing development within the urban footprints on land which is not zoned for housing or does not contain a specific requirement for housing provision. Where the yield on zoned sites is higher than the estimate in BMAP this is taken as windfall, where the yield is lower this is taken off the windfall development figure. While the figures indicate that almost all of the windfall estimate in BMAP has already been granted planning permission for housing it is considered inappropriate to carry out a further windfall exercise. If the level of windfall development up to 2015 equals that achieved since March 2003 this could result in the potential housing yield being some 8% over the Adjusted HGI.

**Table 3 Windfall Development in the Belfast Metropolitan Urban Area**

	Windfall Estimate in BMAP	Windfall Development to 2006
Belfast	3326	4386
Carrickfergus	452	219
Castlereagh	507	341
Lisburn	903	553
Newtownabbey	726	693
North Down	817	361
Total	6731	6553

- **Strategic Directions in the RDS.** (see paragraphs 4.1 – 4.6)
- **Phasing.** Phasing of housing land was not introduced in BMAP in view of the level of commitments. It is considered that if additional Greenfield sites are introduced in response to the Adjusted HGI it may be appropriate to put this land into a later phase.

#### **4.0 STRATEGIC DIRECTIONS IN THE RDS**

- 4.1 The allocation process in BMAP for the Metropolitan Urban Area followed the sequential approach as set out in the RDS.
- 4.2 The RDS refers to maintaining a tension between the amount of housing within urban footprints and Greenfield sites and maximising the amount of housing within urban footprints. It is considered BMAP achieved an appropriate balance between urban capacity sites and Greenfield sites and that potential housing zoning within the urban footprints is maximised.
- 4.3 Consequently it is likely that any additional land for housing in response to the Adjusted HGI will be located principally on Greenfield sites beyond the settlement development limits in BMAP.
- 4.4 The figures in Table 2 indicate that potential housing yield in the Metropolitan Urban Area is within 4% the Adjusted HGI as a result of the level of commitments and increased densities without taking into account any adjustment to the windfall allowance. In terms of meeting the Adjusted HGI therefore there is a requirement to accommodate a further 2214 dwellings.

- 4.5 The RDS gives a clear direction that West Lisburn and Newtownabbey should be locations for future major planned expansion. BMAP was unable to give significant housing growth to these areas in view of the potential housing yield from other sources. It is considered that if the strategic direction in the RDS is to be sufficiently recognised then additional land at these locations for housing is needed. It is considered these locations should provide the main focus for any additional future housing growth and this should be the prime consideration in determining the location of additional land for housing.
- 4.6 Outside of West Lisburn and Newtownabbey the RDS gives no clear direction for growth to other locations in the Metropolitan Urban Area. However some housing growth may be in accordance with the regional role and function of the various component parts as set out the RDS.

## **5.0 OTHER FACTORS AFFECTING THE LOCATION OF FUTURE HOUSING GROWTH**

- 5.1 As a further stage in addressing the Adjusted HGI for the Metropolitan Urban Area the Department has identified a number of factors to be used to assess the suitability of additional sites for future housing growth.
- 5.2 The following two factors are considered to be determining obstacles to housing development suitability:

- 1. Environmental designations.** Much of the land adjoining the settlement development limits in BMAP is the subject of proposed environmental designations which include:
  - Areas of High Scenic Value
  - Rural Landscape Wedges

- Sites of Local Nature Conservation Importance
- Local Landscape Policy Areas
- The Lagan Valley Regional Park
- The Coastal Area

The Department considers land which is the subject of one or more of the above environmental designations is not suitable for future housing growth.

**2. Constraints on development.** The Department considers that land which is the subject of constraints regarding infrastructure, flooding, steepness of land and other physical constraints is not suitable for further growth.

5.3 The following four factors will be used to make judgements between those sites which are not excluded on the basis of the above two factors.

**3. Compact Urban form.** Sites should result in a compact urban form and should not lead to an excessive amount of growth in any one direction. Sites which abut the settlement development limits in BMAP will be considered preferable to those which do not abut the limit.

**4. Definition of settlement development limits.** Where a settlement development limit in BMAP follows a well defined physical boundary including a major road, river or other physical feature then breach of that boundary to allow for growth will not be the preferred option if other sites that can more readily be absorbed into the urban form are available.

**5. Social Housing.** A site that could contribute to meeting the need for social housing will be preferred above other sites which do not meet such need.

**6. Council views.** The Department considers the views of the Councils should be taken into account in allocating housing growth potential to the various component parts of the Metropolitan Urban Area. The views of the various Councils from the consultation process associated with the publication of BMAP are given below.

- Carrickfergus Borough Council - support the settlement development limits as shown in BMAP
- Newtownabbey Borough Council – do not identify any strategic direction for future growth
- North Down Borough Council – do not identify any strategic direction for future growth
- Castlereagh Borough Council – identify Dundonald as a strategic direction for future growth
- Lisburn City Council – identify Lisburn City as a strategic direction for future growth
- Belfast City Council – do not identify any strategic direction for future growth

## **6.0 APPROACH TO SITE SPECIFIC OBJECTIONS**

6.1 In order to assist the Public Inquiry process the Department would propose to submit the following information in relation to site specific housing objections prior to the second stage of the Public Inquiry:

- An indication of those objection sites which are considered to meet Strategic Directions in the RDS and are suitable in principle for housing as measured against the first two factors listed above. The Department will give an indication of the quantum of land and the

consequences for the level of housing potential against the Adjusted HGI. A preliminary analysis of objection sites in West Lisburn indicates that some 390 hectares are not subject to any environmental designations in BMAP. An average density of 25 dwellings per hectare on the above sites would yield almost 10,000 dwellings resulting in a 14% provision over the Adjusted HGI not taking account of any adjustment to the windfall allowance. The amount of this land which is not constrained for development purposes will be determined following receipt of site specific consultations. An assessment of the sites against the last four factors listed above will be presented at the site specific stage of the Public Inquiry. Land indicated as suitable for expansion in Newtownabbey in the RDS is subject to an environmental designation in BMAP and therefore is not included in terms of the quantum at this time.

- An indication of those objection sites which do not meet Strategic Directions but which will contribute to the role and function of the component part of the Metropolitan Urban Area and are suitable for housing in terms of the six listed factors. The Department will give an indication of the quantum of land within this category and the consequences for the level of housing potential against the Adjusted HGI. Taking into account the environmental designations it is considered the quantum of land will not be significant in terms of the Adjusted HGI.
- An indication of those objection sites which are considered unacceptable for reasons other than housing need (constraints, environmental issues etc) and an indication of those reasons.
- An indication where the Department considers there may be more appropriate alternative sites for housing which are not the subject of objection. While the Department would be prepared to indicate in



very broad terms possible areas which might be considered to be appropriate for housing, it would not discuss the specific location or the merits of alternative sites.

## **7.0 AMOUNT OF ADDITIONAL HOUSING GROWTH POTENTIAL**

7.1 The amount of additional housing land to be brought forward in the adopted plan will take account of a number of factors including:

- The Adjusted HGI.
- Following the Public Inquiry process the removal of sites zoned for housing in BMAP.
- Following the Public Inquiry process the re zoning for housing of land which is currently zoned for an alternative use in BMAP.
- Following the Public Inquiry process the inclusion of land for housing which is currently the subject of environmental designations in BMAP.
- The amount of alternative land considered more appropriate for housing but which is not the subject of objection.
- The assessment by DRD of general conformity taking into account the level of over provision in relation to the Adjusted HGI.

## **8.0 CONCLUDING SUMMARY**

8.1 By way of summary some key strategic factors associated with the Adjusted HGI in the Metropolitan Urban Area that are raised in this Section are:-

- The potential housing yield at 2006 is only 4% lower than Adjusted HGI due to the yield from committed housing sites and windfall development.
- The opportunity to better meet other RDS housing growth related strategic directions to some appropriate extent but with

the need to balance this against any further over-provision that may be the likely result.

- The establishment of criteria (factors) to allow a revised future housing growth assessment at both strategic and site specific levels.
- The complexity of the various factors that can determine the ultimate extent of new housing land zonings in the Metropolitan Urban Area.

## SECTION 2

### 9.0 THE APPROACH TO THE ADJUSTED HGI IN THE METROPOLITAN RURAL AREA

9.1 The approach to the Adjusted HGI in the Metropolitan Rural Area is set out in this section as follows:

- Re-assessment of previous studies.
- Factors to be taken into consideration in the allocation of future housing growth potential.
- Revised allocation.
- Other factors affecting the location of future housing growth.
- Approach to site specific objections
- The amount of additional housing growth potential.
- Concluding Summary.

### 10.0 ASSESSMENT OF PREVIOUS STUDIES

10.1 In addressing the issue of the location and amount of housing growth potential in the Metropolitan Rural Area in light of the Adjusted HGI the Department has firstly assessed whether any of the studies or work undertaken in association with the housing allocation process need to be updated or re-done as follows:

- **Assessment of potential yield from committed housing sites and windfall.** It is considered appropriate to up-date the housing figures supplied in the Population and Housing Technical Supplement to take account of planning permissions granted since March 2003. This will also allow an assessment to be made of the reasonableness of the windfall figures and of minimum and maximum densities. Table 4 provides figures for the overall potential yield in the various settlements taking account of the 2006 Housing Land Availability Survey undertaken by the Department.

(The Department has re-presented the figures in the Population and Housing Technical Supplement and updated these figures to 2006. Both the re-presentation of the original figures and the updated figures are available from the Department on request). Additional yield arising from development of sites outside of the urban footprints and not taken account of in BMAP is included in the updated figures. The potential housing yield in 2006 in the Metropolitan Rural Area is almost equivalent to the Adjusted HGI.

- **The Urban Capacity Study.** The urban capacity study undertaken as part of the BMAP process identified a significant number of sites within the urban footprints that are suitable for housing growth. Any sites not identified as part of this exercise are still able to be brought forward and will constitute windfall development. It is therefore considered there is no requirement to carry out a further urban capacity exercise.
- **Application of minimum and maximum densities.** BMAP identifies minimum densities for sites within the urban footprints which were determined following an assessment of the sites and taking into account the need to promote as much housing as possible within the urban footprints. Appendix 3 provides an analysis of planning permissions granted since March 2003 on sites zoned for housing in BMAP, within the urban footprints, which were not the subject of either a planning approval or a current planning application for housing prior to March 2003. A comparison of the densities being approved against the density figures in BMAP indicates the figures in BMAP do not need adjustment and that individual adjustments can be made in response to specific objections. Similarly on Greenfield sites a minimum and maximum density is provided in BMAP and figures for recent planning permissions given in Appendix 4 indicate the figures in BMAP do

not need adjustment and that individual adjustments can be made in response to specific objections.

**Table 4: Potential Housing Yield in the Metropolitan Rural Area**

<b>SETTLEMENT</b>	<b>POTENTIAL YIELD IN BMAP</b>	<b>2006 POTENTIAL YIELD</b>
<b>Towns</b>		
Ballyclare	2156	2269
Carryduff	1328	1443
Greenisland	915	969
Hillsborough	754	803
Moira	814	868
Whitehead	230	246
<b>Villages</b>		
Aghalee	100	125
Annahilt	92	105
Dromara	187	211
Drumbeg	76	85
Drumbo	6	8
Glenavy	354	492
Lower Ballinderry	129	176
Maghaberry	437	481
Milltown	155	163
Ravernet	5	33
Stoneyford	144	170
Upper Ballinderry	41	42
Ballyeaston	2	2
Ballynure	121	126
Ballyrobert	93	93
Cogry/kilbride	106	122
Doagh	312	360
Straid	87	88
Crawfordsburn	24	23
Groomsport	216	252
Helens Bay	54	82
Seahill	37	50
Moneyreagh	130	142
Small Settlements	507	620
Open Countryside	844	844
Windfall	190	8*
<b>Total</b>	<b>10646</b>	<b>11501</b>

\*This is the residual uncommitted windfall total. Windfall development granted planning permission since March 2003 is included in figures in rows above.

- **Zoning of existing industrial land.** A significant number of sites zoned as existing industry are the subject of individual objections and will be discussed at the Public Inquiry. In light of this and the importance of existing industrial land to the overall supply of land for employment purposes it is considered inappropriate to re-examine all the remaining industrial land which is not the subject of objection with a view to re-zoning as housing.
- **Specialist Housing Needs.** The Housing Needs Assessment carried out by the Northern Ireland Housing Executive (NIHE) was taken into account in preparation of BMAP. Whilst the requirement for additional land outside settlement development limits to meet specialist needs can be dealt with as part of the inquiry into specific objections it is considered appropriate to take into account any shortfall in the level of provision.
- **Environmental Designations.** A considerable amount of land adjoining the settlement development limits in BMAP is the subject of environmental designations in addition to Green Belt. It is considered inappropriate to carry out any re-assessment of these designations. General and site specific objections will be dealt with at the Public Inquiry.
- **Windfall Potential.** It is considered appropriate to provide an indication of the level of windfall development being achieved and revise the allowance if appropriate. Table 5 contains figures regarding the yield from windfall development over the past three years. Windfall is all housing development within the urban footprints on land which is not zoned for housing or does not contain a specific requirement for housing provision. Where the yield on zoned sites is higher than the estimate in BMAP this is

taken as windfall, where the yield is lower this is taken off the windfall development figure. The figures indicate that almost all of the windfall estimate in BMAP has already been approved. It is considered the allowance in BMAP for windfall development in Ballyclare and Carryduff needs to be increased.

**Table 5. Windfall Development in the Belfast Metropolitan Rural Area**

	Windfall Estimate in BMAP	Windfall Development 2006
Ballyclare	50	76
Carryduff	70	66
Greenisland	70	40
Total	190	182

- **Countryside Assessment.** It is considered there is no requirement to undertake any further work in association with the countryside assessment.
- **Broad Evaluation Framework.** It is considered appropriate to carry out a broad evaluation framework to include the three small towns of Hillsborough, Moira and Whitehead together with the 23 villages to assist in any revised allocation of growth to these settlements. A revised Broad Evaluation Framework is contained in Table 6.
- **Allocation to settlements.** In view of the Adjusted HGI it is considered that a re-allocation of housing growth potential between settlements is necessary.
- **Allowance to the open countryside and allocation to small settlements.** The allowance to the open countryside in BMAP was mainly based on past trends. It is considered there is no

requirement to re-assess this figure. The allocation to the small settlements was based on housing potential from committed sites and sites suitable for housing. In view of the existing potential for development and the role and function of small settlements it is considered the allowance to this tier of settlement should reflect current commitments only.

**Table 6. Revised Broad Evaluation Framework for the Metropolitan Rural Area**

Settlement	Resource Test	Environmental Capacity Test	Transport Test	Economic Development Test	Urban & Rural Character Test	Community Services Test	Social Equity Test	Score
<b>Towns</b>								
Hillsborough	M	H	M	M	L	M	M	M
Moira	M	M	H	H	L	M	M	M
Greenisland	M	O	M	M	L	M	M	O
Whitehead	H	O	M	M	L	M	M	O
Ballyclare	H	H	M	H	M	H	H	H
Carryduff	H	H	M	H	H	H	H	H
<b>Villages</b>								
Aghalee	M	L	L	L	L	M	L	L
Annahilt	L	H	L	L	M	L	L	L
Dromara	M	M	L	M	M	M	L	M
Drumbeg	L	L	L	L	L	L	L	L
Drumbo	L	L	L	L	M	L	L	L
Glenavy	M	M	M	M	M	M	L	M
Lower Ballinderry	L	H	L	L	M	L	L	L
Magheraberry	L	M	L	L	H	L	L	L
Milltown	L	L	L	L	L	L	L	L
Ravernet	L	M	L	L	L	L	L	L
Stoneyford	L	L	L	L	L	L	L	L
Upper Ballinderry	L	M	L	L	L	L	L	L
Ballyeaston	L	L	L	L	L	L	L	L
Ballynure	L	M	L	L	L	L	L	L
Ballyrobert	L	H	L	L	L	L	L	L
Cogry/Kilbride	L	M	L	L	L	L	L	L
Doagh	M	H	L	L	M	M	L	M
Straid	L	L	L	L	M	L	L	L
Crawfordsburn	L	L	M	L	L	L	L	L
Groomspoint	L	L	L	L	L	L	L	L
Helen's Bay	L	O	M	L	L	L	L	O
Seahill	L	M	M	L	L	L	L	L
Moneyreagh	L	H	L	L	M	L	L	L



- **Strategic Directions in the RDS.** See paragraphs at 11.4.
- **Phasing.** Phasing of housing land was not introduced in BMAP in view of the level of commitments. It is considered that if additional Greenfield sites are introduced in response to the Adjusted HGI it may be appropriate to put this land into a later phase.

## **11.0 FACTORS TO BE TAKEN INTO CONSIDERATION IN THE ALLOCATION OF FUTURE HOUSING GROWTH POTENTIAL.**

- 11.1 The allocation process in BMAP for the Metropolitan Rural Area followed the sequential approach as set out in the RDS. It is considered the approach to identifying land to meet the adjusted HGI should follow the same sequence.
- 11.2 The RDS refers to maintaining a tension between the amount of housing within urban footprints and Greenfield sites and maximising the amount of housing within urban footprints. It is considered BMAP achieved an appropriate balance between urban capacity sites and Greenfield sites and that potential housing zoning within the urban footprints is maximised.
- 11.3 Consequently it is likely that any additional land for housing in response to the adjusted HGI will be located principally on Greenfield sites beyond the settlement development limits in BMAP.
- 11.4 In allocating the Adjusted HGI a number of factors have been taken into account as set out below. The first two factors, RDS directions and the Broad Evaluation Framework, were considered as part of the BMAP allocation process. The remaining factors are ones which were

not fully taken into account in the BMAP process but which it is now considered are relevant to any resulting opportunity for increased housing growth.

1. **RDS directions.** The RDS refers to the significant planned expansion of seven small towns including Ballyclare, Carryduff and Moira which fall within the Metropolitan Rural Area. In particular the RDS indicates that with further growth Ballyclare will begin to take on the wider role of a main town. The RDS also makes reference to the consolidation of towns and villages and no large scale expansion of towns and villages in the BMA travel to work area. Overall it is considered that Ballyclare, Carryduff and Moira will be the main focus of additional growth.
2. **Revised Broad Evaluation Framework.** Table 6 contains a revised broad evaluation framework which the Department has undertaken. The evaluation has been extended to include the three small towns of Hillsborough, Moira and Whitehead together with all the villages. The RDS does not require a ranking of the tests and accordingly equal weight is given to each. In evaluating each settlement against the individual tests a broad scoring system based on a high (H), medium (M), low (L) and zero (0) has been used. The final score reflects the totality of the individual scores. The higher the score the more suitable a settlement is considered to be for growth.

Where a settlement scores zero under the environmental capacity test it is considered there is no potential for further growth and therefore the overall score given to that settlement will be zero.

Table 6 indicates that Carryduff and Ballyclare score high, Moira and Hillsborough together with the villages of Dromara and Glenavy score medium. All other settlements score low.

The towns of Greenisland and Whitehead and the village of Helen's Bay score a zero against the environmental test and therefore are indicated as having no potential for growth.

3. **Age of Extant Plans** It is considered the time that has elapsed since the last review of a statutory plan is a factor to take into account in allocating any extra housing growth potential to settlements. Where it is some time since a plan was reviewed there may be reason to consider allocating additional housing growth to some of the settlements included in the area covered by such a plan. Table 7 provides details of the last review of relevant extant plans.

**Table 7. Review of Relevant Statutory Development Plans**

District Council Area	Extant Plan	Time of Review
Belfast	Belfast Urban Area Plan (BUAP)	1990
Newtownabbey	Newtownabbey Area Plan (NAP)	1993 (Plan never adopted. Modifications were published but did not go to Public Inquiry.
Lisburn	Lisburn Area Plan	2001
Castlereagh	Carryduff Local Plan (no statutory plan for the District)	1988
Carrickfergus	Carrickfergus Area Plan	2000
North Down	North Down and Ards Area Plan	1984

The districts where it is considered the length of time since the last review is a factor are Belfast, Newtownabbey, North Down and Castlereagh.

4. **Land removed from the extant plans** Ballyclare is the only town in the Metropolitan Rural Area where a significant amount of zoned land was removed in BMAP to take account of the HGI in the RDS. It is considered this accounts for some 19.5 hectares which at an average density of 25 per hectare would yield approximately 500 dwellings. It is considered that additional housing growth should be allocated to Ballyclare to reflect this.
  
5. **Infrastructure.** It is considered that housing growth potential should be allocated to areas where additional growth will assist in the provision of identified infrastructural requirements. BMAP contains a proposal for a non strategic road scheme in Ballyclare, Proposal BE 14 the Ballyclare Relief Road, which aims to provide traffic relief in Ballyclare town centre and facilitate housing development. The road is to be funded in the main by developer contributions. It is considered additional housing growth in Ballyclare will increase potential for delivery of the road and allow housing to take advantage of the road scheme.
  
6. **Council Views.** The Department considers the views of the Councils should be taken into account in allocating housing growth potential to settlements. The views of the various Councils from the consultation process associated with the publication of BMAP are given below.
  - Carrickfergus Borough Council – Do not identify any strategic direction for further growth.
  - Newtownabbey Borough Council – Identify Ballyclare and the villages as requiring further growth. However it is acknowledged that some villages may be more appropriate for further growth than others.
  - North Down Borough Council – Do not identify any strategic direction for further growth.

- Castlereagh Borough Council – Identify Carryduff, Moneyreagh and Crossnacreevy as requiring further growth.
- Lisburn City Council – identify all villages as requiring further growth.
- Belfast City Council area does not identify any strategic direction for further growth.

**7. Social housing.** The Housing Needs Assessment produced by the Northern Ireland Housing Executive and published in Technical Supplement 1 identifies the level of social housing need in the Plan Area. Table 8 sets the identified need in the towns and villages against the BMAP allocation for social housing. It is considered the allocation of housing growth potential should take into account any shortfall in the provision of social housing.

11.5 Table 9 provides an evaluation of the towns and villages against each allocation of housing growth potential to the settlements against the Adjusted HGI. In evaluating each factor a broad scoring system based on a high (H), medium (M) and low (L) and zero (0) value has been used. The final score reflects the totality of the individual scores. The evaluation is by tier; a high score for a town suggests the allocation of more housing growth potential than a high score for a village. Where a settlement has scored a zero against the broad evaluation framework then it is considered there is no potential for further expansion of the settlement development limit and the overall score for that settlement is therefore zero

**Table 8: Social Housing in the Metropolitan Rural Area**

Settlement	NIHE Housing Needs Assessment (HNA). Social Housing need within the Rural BMA.	Draft Plan allocation	Shortfall
<b>Towns</b>			
Ballyclare	10	-	10
Hillsborough/ Culcavey	32	9	23
Moira	17	-	17
Carryduff	47	15	32
Whitehead	5	-	5
Town Total	111	24	87
<b>Villages</b>			
Aghalee	2	-	2
Dromara	4	-	4
Drumbo	4	-	4
Drumbeg/ Ballyskeagh/ Lambeg	98	-	98
Glenavy	19	-	19
Lower and Upper Ballinderry	2	-	2
Maghaberry	4	-	4
Stoneyford	5	-	5
Doagh	8	-	8
Ballynnure	3	-	3
Groomsport	30	-	30
Crawfordsburn/ Helen's Bay	10	-	10
Moneyreagh	8	-	8
Seahill	-	4*	-
Village/ Total	197	4	197
<b>OVERALL TOTAL</b>	<b>308</b>	<b>28</b>	<b>284</b>

\*Note: Seahill was allocated 4 social houses which are not identified in the HNA.

**Table 9. Assessment of towns and villages against the seven factors**

SETTLEMENT	(1) RDS DIRECTION	(2) REVISED BROAD EVALUATION FRAMEWORK	(3) AGE OF THE EXTANT PLANS	(4) LAND REMOVED FROM THE EXTANT PLANS	(5) INFRA - STRUCTURE	(6) COUNCIL VIEWS	(7) SOCIAL HOUSING	(8) OVERALL SCORE
<b>Towns</b>								
Ballyclare	H	H	H	H	H	H	M	H
Carryduff	M	H	H	0	L	H	H	M
Greenisland	L	0	L	0	L	0	L	0
Hillsborough	L	M	L	0	L	0	H	L
Moira	M	M	L	0	L	0	M	L
Whitehead	L	0	L	0	L	0	L	0
<b>Villages</b>								
Aghalee	0	L	L	0	L	H	L	M
Annahilt	0	L	L	0	L	H	0	L
Dromara	0	M	L	0	L	H	L	M
Drumbeg	0	L	L	0	L	H	H	H
Drumbo	0	L	L	0	L	H	L	M
Glenavy	0	M	L	0	L	H	M	H
Lower Ballinderry	0	L	L	0	L	H	L	M
Maghaberry	0	L	L	0	L	H	L	M
Milltown	0	L	L	0	L	H	0	L
Ravernet	0	L	L	0	L	H	0	L
Stoneyford	0	L	L	0	L	H	L	M
Upper Ballinderry	0	L	L	0	L	H	L	M
Ballyeaston	0	L	H	0	L	H	0	M
Ballynure	0	L	H	0	L	H	L	H
Ballyrobert	0	L	H	0	L	H	0	M
Cogry/ki bride	0	L	H	0	L	H	0	M
Doagh	0	M	H	0	L	H	L	H
Straid	0	L	H	0	L	H	0	M
Crawfordsburn	0	L	H	0	L	0	L	L
Groomspoint	0	L	H	0	L	0	H	M
Helens Bay	0	0	H	0	L	0	M	0
Seahill	0	L	H	0	L	0	0	L
Moneyreagh	0	L	H	0	L	H	L	H

## 12.0 REVISED ALLOCATION

12.1 In allocating the additional housing growth across the settlements it is considered that in light of the Directions in the RDS the proportion of growth in the village tier should not increase. Those villages which score low in Table 9 are not allocated any uplift, those which score medium retain their proportion and those which score high either retain or increase their proportion.

- 12.2 In view of environmental constraints it is considered that no additional housing growth should be allocated to Greenisland, Whitehead and Helens Bay.
- 12.3 In light of directions in the RDS, the identified infrastructural requirements, the age of the extant plan and the need to adjust the windfall estimate it is considered the relative proportion of housing growth to Ballyclare should increase. The remaining three towns should maintain their relative proportion of housing growth.
- 12.4 The allocation to the Small Settlements and the allowance to the open countryside should not be increased as already referred to in Paragraph 9.1.
- 12.5 Columns 1 – 6 of Table 10 contain a revised allocation to settlements based on the above.
- 12.6 However it is considered the figures in Column 6 of Table 10 do not fully take into account the following;
- The amount of land removed from Ballyclare in BMAP
  - The provision of the Ballyclare Relief Road.
  - Growth to Carryduff in light of its score against the seven factors and windfall development
  - Growth to those villages which have scored high against the seven factors.
- 12.7 In view of the above an adjusted allocation has been made as shown in column 7 of Table 10. Ballyclare Carryduff and those villages with a high score have been allocated further additional growth.



12.8 Column 8 of Table 10 provides figures for the potential housing yield in settlements based on the 2006 Land Availability Monitor. The level of commitments in the village tier and the small settlements is above the allocated figure in Column 7. It is therefore considered appropriate to allocate further additional housing growth to the town tier in order to maintain the relative proportions between the town and village tiers. Column 9 of Table 10 contains a second adjusted allocation which increases the amount of housing growth potential in Carryduff and Ballyclare, the two towns with the highest scores. The second adjusted allocation is approximately 7% over the Adjusted HGI.

12.9 Column 9 indicates the shortfall in housing provision between the second adjusted allocation figure and the potential yield. The shortfall figures for Ballyclare, Carryduff and Greenisland take account of the windfall estimate.

12.10 It is considered the second adjusted allocation to the Belfast Metropolitan Rural Area meets the relevant directions in the RDS and takes account of other important considerations. The quantum of land to be brought forward in light of the Adjusted HGI is that required to meet the total of Column 10 of Table 10.

12.11 In view of infrastructural requirements in Ballyclare it is considered that phasing is inappropriate. Phasing of additional housing land in Carryduff and Moira may be appropriate.

### **13.0 OTHER FACTORS AFFECTING THE LOCATION OF FUTURE HOUSING GROWTH**

13.1 The Department has identified a number of factors to be used to assess the suitability of individual sites for future housing growth above that which is already accommodated for in BMAP.

13.2 The following two factors are considered to be determining obstacles to housing development suitability.

**1. Environmental designations.** Some land adjoining the settlement development limits in BMAP is the subject of proposed environmental designations which include

- Areas of High Scenic Value
- Sites of Local Nature Conservation Importance
- Local Landscape Policy Areas
- The Lagan Valley Regional Park
- The Coastal Area

The Department considers land which is the subject of one or more of the above environmental designations is not suitable for future housing growth.

**2. Constraints on development.** The Department considers land which is the subject of constraints regarding infrastructure, flooding, steepness of land and other physical constraints is not suitable for future housing growth.

13.3 The following three factors will be used to make judgements between those sites which are not excluded on the basis of the above two factors.

**3. Compact Urban form.** Sites should result in a compact urban form and should not lead to an excessive amount of growth in any one direction. Sites which abut the settlement development limits in BMAP will be considered preferable to those which do not abut the limit.

4. **Definition of settlement development limits.** Where the settlement development limit in BMAP follows a well defined physical boundary including a major road, river or other physical feature then breach of that boundary to allow for growth will not be the preferred option if other sites that can more readily be absorbed into the urban form are available.
  
5. **Social housing.** A site that could contribute to meeting the need for social housing will be preferred above other sites which do not meet such need.

#### **14.0 APPROACH TO SITE SPECIFIC OBJECTIONS**

14.1 In order to assist the Public Inquiry process the Department would propose to submit the following information in relation to site specific housing objections prior to the second stage of the Public Inquiry:

- An indication of those objection sites which are considered to be acceptable in principle for housing as measured against the first two factors above. The Department will give an indication of the quantum of land within this category for each settlement and the consequences for the level of housing growth potential against the Adjusted HGI. An assessment of sites against the last three factors above will be presented at the site specific stage of the Public Inquiry.
  
- An indication of those objection sites which are considered unacceptable for reasons other than housing need (constraints, environmental issues etc) and an indication of those reasons.

**Table 10: Revised allocation to Settlements in the Metropolitan Rural Area**

1. Settlement	2. BMAP Yield (inc. windfall)	3. Percentage of allocation in BMAP	4. Score against the relevant factors	5. Uplift	6. Revised allocation	7. Adjusted allocation	8. Potential yield 2006	9. Second adjusted allocation	10. Difference/Figures in brackets refer to windfall )
<b>Towns</b>									
Ballyclare	2206*(50)	21%	H	459	2665	2800	2269	2950	581(100)
Carryduff	1398*(70)	13%	M	123	1521	1571	1443	1671	128(100)
Greenisland	985*(70)	9%	0	0	985	985	989	969	0
Hillsborough	754	7%	L	65	819	819	803	819	16
Moirá	814	8%	L	122	936	936	868	936	68
Whitehead	230	2%	0	0	230	230	246	246	0
<b>Total</b>	<b>6387</b>	<b>60%</b>		<b>769</b>	<b>7156</b>	<b>7341</b>	<b>6598</b>	<b>7591</b>	<b>993</b>
<b>Villages</b>									
Aghalee	100	0.90%	M	5	105	105	125	125	0
Annahilt	92	0.90%	L	0	92	92	105	105	0
Dromara	187	2%	M	47	234	234	211	234	23
Drumbeg	76	0.70%	H	6	82	92	85	92	7
Drumbo	6	0.10%	M	6	12	12	8	12	4
Glenny	354	3.30%	H	36	390	396	492	492	0
Lower Ballinderry	129	1.20%	M	11	140	140	176	176	0
Maghaberry	437	4%	M	31	468	468	481	481	0
Milltown	155	1.50%	L	0	155	155	163	163	0
Ravernet	5	0.05%	L	0	5	5	33	33	0
Stoneyford	144	1.40%	M	20	164	164	170	170	0
Upper Ballinderry	41	0.40%	M	6	47	47	42	47	5
Ballyeaston	2	0.02%	M	0	2	2	2	2	0
Ballynure	121	1.10%	H	12	133	139	126	139	13
Ballyrobert	93	0.90%	M	105	105	105	93	105	12
Cogry/kilbride	106	1%	M	11	117	117	122	122	0
Doagh	312	3%	H	43	355	361	360	361	1
Straid	87	0.80%	M	7	94	94	88	94	6
Crawfordsburn	24	0.20%	L	0	24	24	23	24	1
Groomsport	216	2%	M	18	234	234	252	252	0
Helens Bay	54	0.50%	0	0	54	54	82	82	0
Seahill	37	0.30%	L	0	37	37	50	50	0
<b>MONEYREAGH</b>	<b>130</b>	<b>1.20%</b>	<b>H</b>	<b>14</b>	<b>144</b>	<b>150</b>	<b>142</b>	<b>150</b>	<b>8</b>
<b>Total</b>	<b>2908</b>	<b>27%</b>		<b>285</b>	<b>3193</b>	<b>3227</b>	<b>3431</b>	<b>3511</b>	<b>80</b>
Small Settlements	507	5%	L	0	507	507	620	620	-
Open Countryside	844	8%			844	844	844	844	-
<b>Overall Total</b>	<b>10646</b>	<b>100%</b>		<b>1054</b>	<b>11700</b>	<b>11919</b>	<b>11493</b>	<b>12566</b>	<b>1073</b>

- An indication where the Department considers there may be more appropriate alternative sites for housing which are not the subject of objection. While the Department would be prepared to indicate in very broad terms possible areas which might be considered to be appropriate for housing, it would not discuss the specific location or the merits of alternative sites.

## **15.0 AMOUNT OF ADDITIONAL HOUSING GROWTH POTENTIAL**

15.1 Reference to the quantum of land to meet the revised housing allocation has already been made in paragraph 11.10. However the precise amount of additional housing land to be brought forward in the adopted plan in the Metropolitan Rural Area will take account of a number of factors including:

- The Adjusted HGI.
- Following the Public Inquiry process the removal of sites zoned for housing in BMAP.
- Following the Public Inquiry process the Re-zoning for housing of land which is zoned for an alternative use in BMAP.
- Following the Public Inquiry process the Inclusion of land which is currently the subject of environmental designations in BMAP.
- The amount of alternative land considered more appropriate for housing but which is not the subject of objection.
- The assessment by DRD of general conformity taking into account the level of over provision in relation to the Adjusted HGI.

## **16.0 CONCLUDING SUMMARY**

16.1 By way of summary some key strategic factors associated with the Adjusted HGI in the Metropolitan Rural Area that are raised in the Section are:

- The fact that the identified potential housing yield in 2006 is virtually the same as the Adjusted HGI figure for the Metropolitan Rural Area.
- The need to balance this potential housing need equilibrium with the opportunity to better address other strategic housing growth related factors such as RDS directions.
- The sequential approach to distributing housing growth potential increased the housing allocation across the various sectors of the Metropolitan Rural Area.
- The establishment of criteria (factors) to allow a revised future housing growth assessment at both strategic and site specific levels.
- The complexity of the various factors that can determine the ultimate extent of new housing land potential in the various constituent parts of the Metropolitan Rural Area.

**Appendix 1. Urban Footprint housing sites within the Metropolitan Urban Area, which were Uncommitted in the Draft Belfast Metropolitan Area Plan and which subsequently have commitments on them as of 1<sup>st</sup> August 2006, and their comparable densities per hectare.**

Council	Settlement	Zoning	Area (Hectares)	Draft BMAP Units	Densities included in the Draft BMAP KSRs	No. of units as Per KSR Densities	Committed units as of 01/08/05	Committed units figure as units per hectare
Belfast	North Belfast	NB 05/07	0.18	10	N/A	N/A (56 per ha)**	13	72 per Ha.
Belfast	North Belfast	NB 05/13	0.60	22	N/A	N/A (37 per ha)**	32	53 per Ha.
Belfast	West Belfast	WB 05/04	0.17	13	N/A	N/A (76 per ha)**	13	76 per Ha.
Belfast	West Belfast	WB 05/06	0.26	16	N/A	N/A (62 per ha)**	16	62 per Ha
Belfast	West Belfast	WB 05/10	0.58	26	N/A	N/A (45 per ha)**	18 (0.36ha)	50 per Ha.
Belfast	West Belfast	WB 05/15	2.4	86	Min. 30 per Ha.	Min. 72	70	29 per Ha.
Belfast	South Belfast	SB 05/02	0.90	28	Min. 25 per Ha.	Min. 23	39	43 per Ha.
Belfast	South Belfast	SB 05/04*	3.91	47	Min. 10 per Ha. Max. 15 per Ha.	Min. 39 Max. 59	35 (3.12ha)	11 per Ha.
Lisburn	Lisburn	LC 05/07	6.61	198	Min. 25 per Ha.	Min. 165	170	26 per Ha.
Lisburn	Metropolitan Lisburn	ML 05/02	3.10	109	Min. 20 per Ha.	Min. 62	106	34 per Ha.
Newtownabbey	Newtownabbey	MNY 05/13	1.06	25	Min. 20 per Ha.	Min. 21	24	23 per Ha.
Newtownabbey	Newtownabbey	MNY 05/14	1.39	34	Min. 20 per Ha.	Min. 28	52	37 per Ha.
North Down	Bangor	BR 05/05	0.69	17	Min. 20 per Ha.	Min. 14	59 (1.54ha)	38 per Ha.

\* signifies a site which has a portion of the site within the Urban Footprint and also a Greenfield location. In this instance the total area of the site is used.

\*\* number of units per hectare relating to the site area and the number of units allocated to the site in the Draft Belfast Metropolitan Area Plan.

**Appendix 2. Greenfield housing sites within the Metropolitan Urban Area, which were Uncommitted in the Draft Belfast Metropolitan Area Plan and which subsequently have commitments on them as of 1<sup>st</sup> August 2006, and their comparable densities per hectare.**

Council	Settlement	Zoning	Area (Hectares)	Draft BMAP Units	Densities included in the Draft BMAP KSRs	No. of units as Per KSR Densities	Committed units as of 01/08/05	Committed units figure as units per hectare
Belfast	West Belfast	WB 05/14	2.14	52	Min. 20 per Ha. Max. 40 per Ha.	Min. 43 Max. 86	72	34 per Ha.
Lisburn	Lisburn	LC 05/08	18.10	326	Min. 15 per Ha. Max. 35 per Ha.	Min. 272 Max. 634	205 (7.99ha)	26 per Ha.
North Down	Bangor	BR 05/06	0.89	26	Min. 25 per Ha. Max. 35 per Ha.	Min. 22 Max. 31	23 (0.68ha)	34 per Ha.



**Appendix 3. Urban Footprint housing sites within the Metropolitan Rural Area, which were Uncommitted in the Draft Belfast Metropolitan Area Plan and which subsequently have commitments on them as of 1<sup>st</sup> August 2006, and their comparable densities per hectare.**

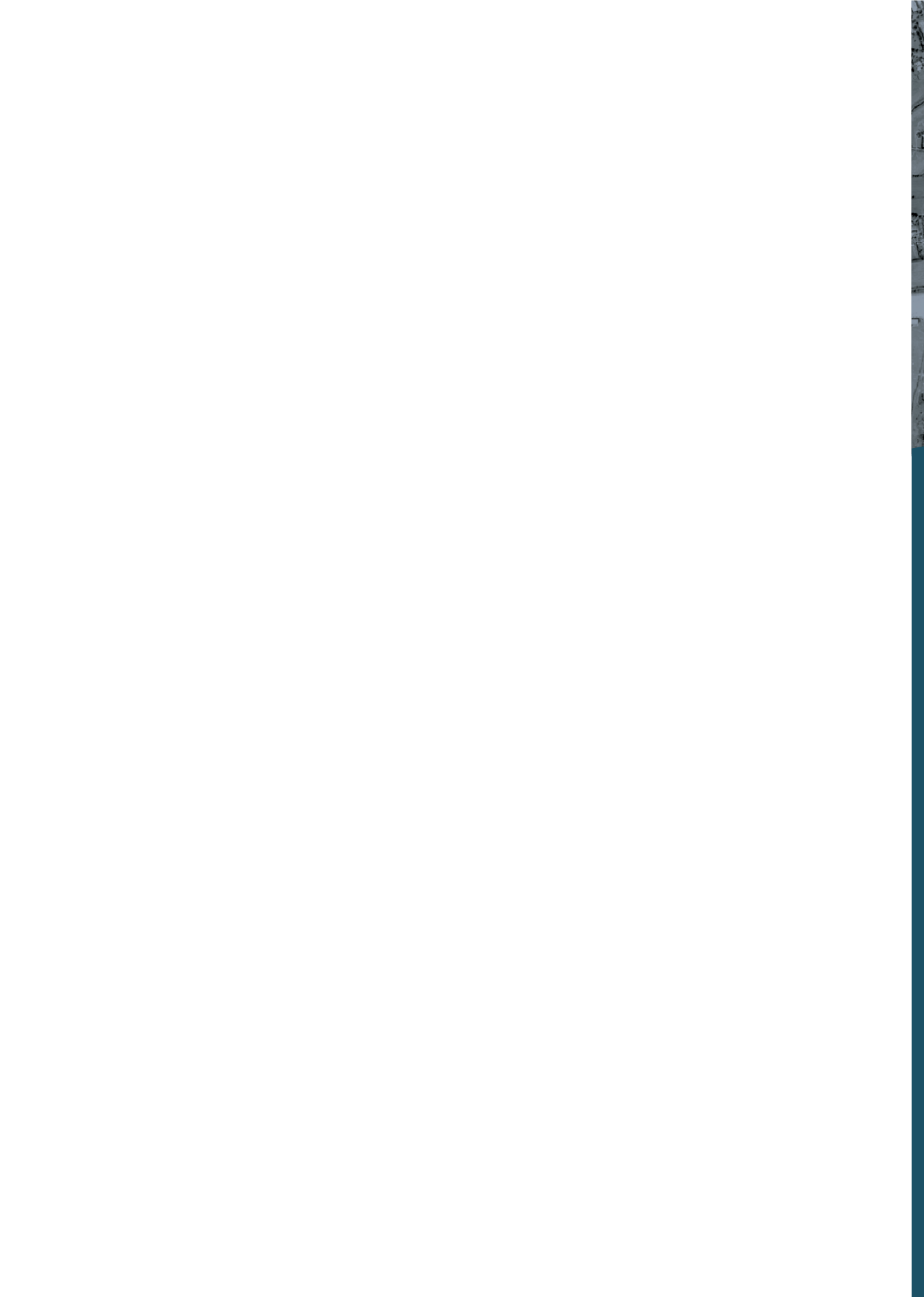
Council	Settlement	Zoning	Area (Hectares)	Draft BMAP Units	Densities included in the Draft BMAP KSRs	No. of units as Per KSR Densities	Committed units as of 01/08/05	Committed units figure as units per hectare
<b>Carrickfergus</b>	Greenisland	GD 05/06	0.89	18	Min. 17 per Ha.	Min. 15	18	20 per Ha.
<b>Castlereagh</b>	Carryduff	CF 05/01	0.84	21	Min. 25 per Ha.	Min. 21	30	36 per Ha.
<b>Newtownabbey</b>	Ballyclare	BE 05/08	2.93	88	Min. 25 per Ha.	Min. 73	109	37 per Ha.

**Appendix 4. Greenfield housing sites within the Metropolitan Rural Area, which were Uncommitted in the Draft Belfast Metropolitan Area Plan and which subsequently have commitments on them as of 1<sup>st</sup> August 2006, and their comparable densities per hectare.**

Council	Settlement	Zoning	Area (Hectares)	Draft BMAP Units	Densities included in the Draft BMAP KSRs	No. of units as Per KSR Densities	Committed units as of 01/08/05	Committed units figure as units per hectare
Castlereagh	Carryduff	CF 05/04	2.56	61	Min. 20 per Ha. Max. 25 per Ha.	Min. 51 Max. 64	110	43 per Ha.
Lisburn	Hillsborough	HH 05/02	1.39	25	Min. 15 per Ha. Max. 25 per Ha.	Min. 21 Max. 35	10 (0.81ha)	12 per Ha.
Lisburn	Moira	MA 04/09	5.29	114	Min. 18 per Ha. Max. 25 per Ha.	Min. 95 Max. 132	108	20 per Ha.

\* signifies a site which has a portion of the site within the Urban Footprint and also a Greenfield location. In this instance the total area of the site is used.







## ANNEX 3

**THE DEPARTMENTAL APPROACH TO THE  
DISTRIBUTION OF HOUSING GROWTH POTENTIAL IN  
THE BELFAST METROPOLITAN AREA AND BELFAST  
METROPOLITAN AREA HINTERLAND. JUNE 2007**

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## **PREAMBLE**

**This paper should be read in conjunction with the Department's earlier approach paper (Adjusted 9 January 2007) which is available on the Department's website. In the interests of clarity large scale text repetition often is unavoidable although where appropriate a reference back to the earlier paper is included. This paper therefore expands the detailed approach as required and changes or supplements the original text as considered necessary.**



## **1.0 INTRODUCTION**

- 1.1 On 9 January 2007 the Department placed a paper on its website regarding its approach to the Adjusted Housing Growth Indicators for the Belfast Metropolitan Area and Belfast Metropolitan Area Hinterland.
- 1.2 The contents of the paper were discussed at Stage 1 of the Public Inquiry into the Draft Belfast Metropolitan Area Plan 2015 (The Public Inquiry) where it was agreed the Department would set out its proposals for the distribution of housing growth potential by the end of June 2007 for further discussion at a later session at The Public Inquiry.
- 1.3 This paper sets out the Department's proposals for the distribution of housing growth potential taking into account matters that were raised at Stage 1 of The Public Inquiry including the overall level of housing growth potential and the factors to be used to assess both strategic distribution and site specific aspects.

## **2.0 BACKGROUND**

- 2.1 HGI 4 in the Regional Development Strategy (RDS) deals with the housing allocation to the Belfast Metropolitan Area and its hinterland. Figure 18 in the RDS sets out the Housing Growth Indicators (HGIs) for the BMA – 42,000, the BMA Rural Hinterland – 9,000 and the BMA Districts Hinterland – 26,500. The HGIs cover the period from the beginning of January 1999 to the end of December 2015. The BMA and the BMA Rural Hinterland make up the Plan Area of the Draft Belfast Metropolitan Area Plan 2015 (BMAP).
- 2.2 Figure 18 in the RDS also sets out the component parts which make up the BMA and the BMA rural hinterland. In order to avoid confusion of

terminology the BMA is referred to in BMAP as the Metropolitan Urban Area and the BMA Rural Hinterland as the Metropolitan Rural Area.

- 2.3 The Metropolitan Urban Area is defined for purposes of allocating the 42,000 dwellings as the continuous built up area centred on Belfast and extending in an arc from Jordanstown to Knocknagoney, together with the City of Lisburn, and the towns of Bangor, Carrickfergus and Holywood.
- 2.4 The continuous built up area includes the city of Belfast and adjoining built up parts of the Districts of Carrickfergus, Castlereagh, Lisburn, Newtownabbey and North Down. These built up areas outside of Belfast are referred to as Metropolitan Areas.
- 2.5 The Metropolitan Rural Area is defined for purposes of allocating the 9,000 dwellings as those parts of the Plan Area lying outside the Metropolitan Urban Area.
- 2.6 The potential housing yield in BMAP for the Metropolitan Urban Area is 51,800, some 23% over the RDS HGI and 10,700 for the Metropolitan Rural Area, some 19% over the RDS HGI. BMAP was formulated and received a certificate of general conformity on the basis of the HGIs in the RDS.
- 2.7 In January 2005 The Department for Regional Development (DRD) published a Review of the Regional Housing Growth Indicators for public consultation. Following receipt of comments a Public Examination was held to examine the methodology used to calculate the figures in the document and the adequacy of the allocation of the figure through the draft HGIs. The Report of the Panel on the Review of Housing Growth Indicators was produced in March 2006. The recommendations included that the Adjusted total HGI for the BMA and BMA Rural Hinterland should be 66,500, an increase of 15,500 over the RDS HGI of 51,000.

2.8 In the Response by DRD to the Report of the Panel published in June 2006 the above recommendation was accepted. Table 1 of the Response provides a breakdown of the HGI into 54,800 for the BMA (Metropolitan Urban Area) and 11,700 for the BMA Rural Hinterland (Metropolitan Rural Area).

2.9 Table 1 summarises the RDS HGI, the potential housing yield in BMAP and the Adjusted HGI. As discussed at Stage 1 of The Public Inquiry the Department considers it appropriate to allow for flexibility around the Adjusted HGI which would amount approximately to a further three year supply of housing land based on a pro rata uplift of the Adjusted HGI figures. The fourth column of Table 1 gives figures which relate to an additional three year pro rata increase of the Adjusted HGIs ('additional three year supply flexibility').

**Table 1 HGI figures and potential housing yield in BMAP**

	RDS HGI	Potential yield in BMAP	Adjusted HGI	3 year pro rata uplift
Metropolitan Urban Area	42,000	51,828	54,800	64,500
Metropolitan Rural Area	9,000	10,646	11,700	13,800
Total	51,000	62,474	66,500	78,300

2.10 Section 1 of this paper sets out the Department's proposals for the distribution of housing growth potential in the Metropolitan Urban Area and Section 2 sets out proposals for the Metropolitan Rural Area. The distribution is based on the pro rata uplifted figures in the final column of Table 1. Appendices 1 to 4 contain an assessment of all relevant objection sites to allow judgements to be made against all levels of housing growth put forward during Stage 1 of The Public Inquiry.

## **SECTION 1**

### **3.0 THE APPROACH TO THE DISTRIBUTION OF HOUSING GROWTH POTENTIAL IN THE METROPOLITAN URBAN AREA**

3.1 As set out in the January 2007 paper the Department considers it appropriate to up-date the housing figures supplied in the Population and Housing Technical Supplement to take account of planning permissions granted since March 2003. Table 2 of the January 2007 paper is re-stated at Table 2 below which provides figures for the overall potential yield in each of the component parts of the Metropolitan Urban Area taking account of the 2006 Housing Land Availability Survey undertaken by the Department. Additional yield arising from development of sites outside of the urban footprints and not taken account of in BMAP is included in the updated figures.

3.2 As discussed at Stage 1 of the Public Inquiry it is not considered appropriate to carry out the following:

- A further urban capacity study;
- An adjustment of the minimum and maximum densities on zoned sites in BMAP;
- A re-examination of all the remaining industrial land which is not the subject of objection with a view to re-zoning as housing;
- A further full housing needs assessment;
- A re-assessment of environmental designations including those which include BUAP Whitelands; and
- A further windfall assessment.

The RDS and phasing are matters which are addressed later in this paper.

3.3 The Department considers that any additional yield arising from successful objections to BMAP within the proposed settlement development limits may be a factor to be taken into account in the

determination of the amount of additional land to be brought forward to meet the Adjusted HGI. This would particularly be the case where the level of additional potential yield arising from this is considered to be significant.

**Table 2 Potential Housing Yield in the Metropolitan Urban Area**

	Potential yield in BMAP	2006 potential yield
<b>Belfast District</b>		
Belfast City Centre	2466	2870
Belfast Harbour Lands	3500	3500
North Belfast	3459	4552
West Belfast	4540	5311
South Belfast	3053	4271
East Belfast	3465	4526
<b>District Total</b>	<b>20483</b>	<b>25030</b>
<b>Carrickfergus District</b>		
Carrickfergus	3516	3755
<b>District Total</b>	<b>3516</b>	<b>3755</b>
<b>Castlereagh District</b>		
Metropolitan Castlereagh	3565	4044
<b>District Total</b>	<b>3565</b>	<b>4044</b>
<b>Lisburn District</b>		
Lisburn City Centre	118	119
Lisburn City	5357	5886
Metropolitan Lisburn	2435	2694
<b>District Total</b>	<b>7910</b>	<b>8699</b>
<b>Newtownabbey District</b>		
Metropolitan Newtownabbey	4740	5509
<b>District Total</b>	<b>4740</b>	<b>5509</b>
<b>North Down District</b>		
Bangor	4472	4899
Hollywood	411	472
<b>District Total</b>	<b>4883</b>	<b>5371</b>
<b>Windfall</b>	<b>6731</b>	<b>178*</b>
<b>TOTAL</b>	<b>51828</b>	<b>52586</b>

\* This is the residual uncommitted windfall total. Windfall development granted planning permission since March 2003 is included in figures in rows above

3.4 The Concluding Summary (Section 8.0) of the January 2007 paper identified the following key strategic factors associated with the distribution of housing growth potential in the Metropolitan Urban Area:

- The potential housing yield at 2006 is only 4% lower than Adjusted HGI due to the yield from committed housing sites and windfall development.
- The opportunity to better meet other RDS housing growth related strategic directions to some appropriate extent but with the need to balance this against any further over-provision that may be the likely result.
- The establishment of criteria (factors) to allow a revised future housing growth assessment at both strategic and site specific levels.
- The complexity of the various factors that can determine the ultimate extent of new housing land zonings in the Metropolitan Urban Area.

Following on from the discussion at Stage I of The Public Inquiry it is considered that two further factors of relevance are:

- The sequential approach to distributing housing growth potential across the Metropolitan Urban Area.
- The Department considers it appropriate to allow for flexibility around the Adjusted HGI up to a level of approximately 64,500 to take account of the 'additional three year supply flexibility'.

3.5 The approach to the distribution of housing growth in the Metropolitan Urban Area builds on the January 2007 paper and is set out in this section as follows:

- Strategic factors to be taken into consideration in the distribution of future housing growth potential.

- Site Specific Factors to be taken into consideration in the distribution of future housing growth potential.
- Assessment of site specific objections against the above factors.
- Potential yield
- Phasing.
- Concluding Summary.

#### **4.0 STRATEGIC FACTORS TO BE TAKEN INTO CONSIDERATION IN THE DISTRIBUTION OF FUTURE HOUSING GROWTH POTENTIAL**

4.1 The allocation process in BMAP for the Metropolitan Urban Area followed the sequential approach as set out in the RDS. It is considered the approach to identifying land for the distribution of housing growth potential to take account of the Adjusted HGI should follow the same sequence.

4.2 The RDS refers to maintaining a tension between the amount of housing within urban footprints and Greenfield sites and maximising the amount of housing within urban footprints. It is considered BMAP achieved an appropriate balance between urban capacity sites and Greenfield sites and that potential housing zoning within the urban footprints is maximised.

4.3 Consequently it is considered that additional land for housing in response to the Adjusted HGI will be located principally on Greenfield sites beyond the settlement development limits in BMAP.

4.4 It is considered that in the context of the Metropolitan Urban Area it is inappropriate to make a strategic allocation to the various component parts. This is the approach adopted in BMAP. Many of the component parts do not constitute settlements but are suburban areas which play a complementary role. It is therefore considered more appropriate to

assess individual sites against both strategic factors, including guidance in the RDS, and site specific factors.

- 4.5 At Stage 1 of The Public Inquiry various levels of housing growth were discussed. In order to facilitate identification of the quantum of land to meet these various levels the assessment of sites against strategic and site specific factors includes a scoring system which allows judgements to be made between sites.
- 4.6 The strategic factors to be taken into account are set out below. The first factor, RDS directions, was considered to some extent as part of the BMAP allocation process. The remaining factors are ones which were not fully taken into account in the BMAP process but which it is now considered are relevant to any resulting opportunity for increased housing growth.

### **Strategic Factors**

1. **RDS Directions.** Following on from Stage 1 of the Public Inquiry it is considered RDS directions should be the prime consideration in determining the location of additional land for housing and that it is appropriate to expand on the January 2007 paper in relation to this factor. The RDS gives a clear direction that Lisburn and Newtownabbey have potential for significant housing expansion due to their strategic location at the meeting point of Key Transport Corridors. Diagram 4 on page 45 of the RDS indicates the Key Transport Corridors. In Lisburn these are the M1 and A1 and in Newtownabbey the M2 and A8. Diagram 5 on page 62 of the RDS provides a broad indication that it is West Lisburn and North West Newtownabbey that are the locations for major planned expansion. BMAP was unable to give significant housing growth to these areas in view of the potential housing yield from other sources. It is considered that this strategic direction in the RDS should be sufficiently



recognised and that additional land at these locations for housing is needed. It is further considered these locations should provide the main focus for additional future housing growth and this direction in the RDS is the main consideration in determining the location of additional land for housing.

Following on from stage 1 of the Public Inquiry it is considered appropriate to expand on the RDS directions regarding housing growth to other locations in the Metropolitan Urban Area as follows:

**Belfast:** - focus development within existing urban footprints and protect and enhance the setting of the City.

**Castlereagh Borough:** - develop its complementary role and enhance its role as an attractive residential location whilst protecting its setting.

**Newtownabbey Borough:** - develop its complementary role.

**Bangor:** - develop the town and consolidate its role as an attractive residential location. Recognise its role as an important commuter settlement.

**Carrickfergus:** - Develop the town and recognise its role as a heritage town and important industrial and service centre with a strengthened housing role.

**Lisburn:** - Develop the town and recognise the high development potential of Lisburn.

Some housing growth will be acceptable in the above locations provided it is in accordance with the regional role and function of the various component parts.

Further to the January 2007 paper it is considered appropriate to highlight RDS directions regarding the protection of strategic environmental assets as follows:

**Lagan Valley Regional Park:** - conserve and enhance the strategic value of the Park.

**Setting of the Metropolitan Area:** - promote the conservation and wise management of the Belfast Hills and consider ways of conserving the regional resource value of the other Antrim, Holywood and Castlereagh Hills which provide the setting for the metropolitan area.

2. **Council Views.** Following on from Stage 1 of the Public Inquiry the Department considers the views of the Councils should be taken into account in the distribution of housing growth potential to the various component parts of the Metropolitan Urban Area. The views of the various Councils from the consultation process associated with the publication of BMAP are given below.

- Carrickfergus Borough Council - support the settlement development limits as shown in BMAP
- Newtownabbey Borough Council – do not identify any strategic direction for future growth
- North Down Borough Council – do not identify any strategic direction for future growth
- Castlereagh Borough Council – identify Dundonald as a strategic direction for future growth
- Lisburn City Council – identify Lisburn City as a strategic direction for future growth

- Belfast City Council – identify urban footprints as the strategic direction for future growth

3. **Social Housing.** Whilst the January 2007 paper did not indicate social housing as a strategic factor, following on from Stage 1 of the Public Inquiry it is now considered appropriate to address this matter. Table 3 provides figures relating to Unprogrammed social housing need in the Housing Needs Assessment updated to 2006. These indicate there is a need for social housing in all component parts of the Metropolitan Urban Area. It is therefore considered that this is not a distinguishing factor between the component parts and that this factor is better applied at the site specific level.

**Table 3: Unprogrammed Social Housing Need in the Metropolitan Urban Area**

<b>Component Area</b>	<b>Unprogrammed Need 2004</b>	<b>Unprogrammed Need 2006</b>
<b>North Belfast</b>	<b>507</b>	<b>1987</b>
<b>South Belfast</b>	<b>471</b>	<b>1020</b>
<b>East Belfast</b>	<b>908</b>	<b>1132</b>
<b>Shankhill</b>	<b>0</b>	<b>142</b>
<b>West Belfast</b>	<b>416</b>	<b>3520</b>
<b>Carrickfergus Town</b>	<b>22</b>	<b>85</b>
<b>Castlereagh Urban</b>	<b>301</b>	<b>395</b>
<b>Lisburn City</b>	<b>214</b>	<b>1166</b>
<b>Dunmurry</b>	<b>88</b>	<b>(included in West Belfast)</b>
<b>Newtownabbey Urban</b>	<b>133</b>	<b>367</b>
<b>Bangor Town</b>	<b>347</b>	<b>805</b>
<b>Holywood</b>	<b>197</b>	<b>209</b>

4.7 With reference to matters raised at Stage 1 of the Public Inquiry the Department would comment as follows:

- The Department is unaware of any relevant direction or guidance on strategic urban design as referred to in paragraph 35 of Planning Policy Statement 12 (PPS12) – Housing in Settlements and has not therefore included this as a factor.
- Paragraph 35 of PPS12 identifies the ability to unlock strategic development opportunities a criterion for the identification of suitable sites. As the strategic directions for growth in the RDS cover all types of development it is considered factor 1 above adequately covers this issue and it is not necessary to include it as a separate factor in the distribution of housing growth potential.
- It is considered that in the context of the Metropolitan Urban Area the directions in the RDS outweigh any consideration regarding age of extant plans which should not therefore be a factor to be taken into account in the distribution of housing growth potential.
- It is considered the emphasis on the sequential approach in order to achieve sustainable development together with the focus on urban capacity sites in BMAP takes account of the need for efficiency in the use of land as referred to in paragraph 4 of Planning Policy Statement 1 – General Principles.
- It is considered that the relevant City/Borough/District Councils are representative of the community and there is no requirement to consult further with individual community groups regarding the distribution of housing growth potential.

## 5.0 SITE SPECIFIC FACTORS TO BE TAKEN INTO CONSIDERATION IN THE LOCATION OF FUTURE HOUSING GROWTH POTENTIAL

5.1 The Department has identified a number of factors to be used to assess the suitability of individual sites for future housing growth above that which is already accommodated for in BMAP.

5.2 The first two factors are considered to be determining obstacles to housing development suitability.

1. **Environmental designations.** Much of the land adjoining the settlement development limits in BMAP is the subject of proposed environmental designations which include:

- Areas of High Scenic Value
- Rural Landscape Wedges
- Sites of Local Nature Conservation Importance
- Local Landscape Policy Areas
- The Lagan Valley Regional Park
- The Coastal Area

The Department considers land which is the subject of one or more of the above environmental designations is not suitable for future housing growth.

2. **Constraints on development.** The Department has consulted with statutory consultees regarding roads, water and sewerage and drainage. Where the replies have indicated a constraint to development the site is considered to be not suitable for future housing growth.

3. **Site Analysis.** This factor, which is further to the January 2007 paper and reflects discussion at Stage 1 of the Public Inquiry,

relates to the characteristics of the site including topography and vegetation.

4. **Northern Ireland Electricity Power Lines.** This factor is further to the January 2007 paper and reflects discussion at Stage 1 of the Public Inquiry. Whilst the presence of power lines is not considered to be a total constraint to development an assessment has been made of the impact such power lines have on individual sites
5. **Compact Urban form.** Sites should result in a compact urban form and should not lead to an excessive amount of growth in any one direction. Sites which abut the settlement development limits in BMAP are normally considered preferable to those which do not abut the limit.
6. **Definition of Settlement Development Limits.** Where a settlement development limit in BMAP follows a well defined physical boundary including a major road, river or other physical feature then breach of that boundary to allow for growth will not be the preferred option if other sites that can more readily be absorbed into the urban form are available.
7. **Social Housing.** As the Department has been unable to distinguish between relevant objection sites against this factor all sites have been scored the same.
8. **Other Matters (comments).** This includes matters not addressed in the above factors and will include planning history, existing built form and other matters which the Department considers material to the assessment of individual sites. Some other matters may come to light during Stage 2 of The Public Inquiry.

## 6.0 ASSESSMENT OF SITE SPECIFIC OBJECTIONS

6.1 In order to assist the Public Inquiry process regarding the distribution and quantum of land which is considered suitable for housing development across the Metropolitan Urban Area the Department has assessed all relevant objection sites against the above strategic and site specific factors. A scoring system has been used against each factor as shown in Table 4.

**Table 4 Scoring of Objection sites in the Metropolitan Urban Area**

FACTOR		SCORE						
<b>Strategic Factors</b>								<b>Unsuitable</b>
1	RDS Directions	+2	+1	0	-1			X
2	Council Views		+1	0	-1			
<b>Site Specific Factors</b>								
3	Environmental Designations							X
4	Constraints on Development							X
5	Site Analysis			0	-1	-2		X
6	NIE Power lines			0	-1			
7	Compact Urban Form		+1	0	-1			X
8	Definition of Settlement Development Limit		+1	0	-1			X
9	Social Housing		+1	0	-1			
10	Other matters	+2	+1	0			A	X

6.2 The scoring system in Table 4 is as follows:

Factor 1. To reflect the directions in the RDS sites located in West Lisburn City and North West Metropolitan Newtownabbey are scored as +2. Sites in the remainder of Lisburn City and Metropolitan Newtownabbey together with those in Metropolitan Castlereagh, Bangor and Carrickfergus are scored as +1, unless the site is of such a scale that is considered to go beyond the RDS directions in which case a score of -1 is given. Sites in Metropolitan Belfast, Metropolitan Carrickfergus, Metropolitan Lisburn, Metropolitan North Down and Hollywood are scored as 0 to reflect a 'nil' strategic role. Additionally where sites are located within the Lagan Valley Regional Park or an Area of High Scenic Value they are scored as X (unsuitable).

Factor 2. Where a site is in a location identified by the relevant Council as being a strategic direction for future growth it is given a score of +1. Where a site is in a location where the relevant Council has not given any view it is given a score of 0. Where the relevant Council has indicated the settlement development limits in BMAP are appropriate then a site is given a score of -1.

Factor 3. Where a site lies within an environmental designation it is scored as X (unsuitable).

Factor 4. Where a consultation response identifies a constraint to development then a site is scored as X (unsuitable).

Factor 5. Where a site is flat, not visually prominent and contains no significant groups of trees then it is given a score of 0. Where a site is either sloping with some degree of visual prominence or where there are significant groups of trees it is given a score of -1. Where a site is either steeply sloping with a significant degree of visual prominence or is mainly covered by trees it is scored as -2. Where a site is steeply



sloping with a high degree of visual prominence and is considered unsuitable for development it is scored as X.

Factor 6. Where a site contains power lines which will not have any significant affect on development in terms of layout then it is scored as 0. Where it is considered the power lines will have a significant affect on achieving a suitable form of development then it is given a score of -1.

Factor 7. Where a site will lead to rounding off it is given a score of +1. Where a site goes beyond rounding off but does not result in considerable growth in any direction it is given a score of 0. Where a site will lead to considerable growth in any direction it is given a score of -1. Where a site will lead to excessive growth in any direction or is of a scale which is inappropriate in relation to the size of the settlement then it is considered unsuitable and given a score of X.

Factor 8. Where a site will result in a more strongly defined development limit it is given a score of +1. Where a site will lead to little or no difference in the definition of the settlement development limit it is given a score of 0. Where a site will result in a more weakly defined settlement development limit it is given a score of -1. Where a site does not abut the development limit it is not given a score against this factor.

Factor 9. As previously mentioned all sites are given a score of 0.

Factor 10. Where a site contains built form which is unsightly it is given a score of +2. Where a site contains built form which is visually acceptable it is given a score of +1. Where a site contains some built form which is insignificant in terms of the site a score of 0 is given. Where the site contains features which will preclude development it is scored as X (unsuitable). Where there is an extant planning permission for residential development a site may be scored as A.

6.3 Where an objection site is scored as unsuitable against any of the seven factors against which an unsuitable score is possible, then generally the site overall is considered unsuitable for development. However, where for a particular objection site it is considered positive RDS directions outweigh an unsuitable score against another factor, particularly compact urban form and development limit characteristics, then the unsuitable score against that factor is placed in brackets (X) in the Appendices and is set aside in the overall scoring. Exceptionally where 'other matters' are considered to be determining in favour of development then an objection site will be scored as 'A' against this factor and this will outweigh any other unsuitable scores for the site.

6.4 Objection sites which are not scored as unsuitable for development against any of the above factors have been placed in a category which reflects the overall scores against the ten factors. The Department considers there are two main methods of placing sites into categories as follows:

1. Adding the individual scores against each factor and basing the categories on the final scores.
2. Basing the categories on the number of positive and negative scores against the individual factors.

The Department is of the opinion that both methods are acceptable but that the second method is preferable as it is a more 'in the round' approach. Furthermore not all objection sites have been scored against all the factors. A site is only scored against 'other factors' where there is a relevant comment. Sites which do not abut the development limit are not scored against Factor 8.

6.5 Where an objection site is deemed unsuitable for development against any factor, subject to the qualification in paragraph 6.3, and where

following discussion at Stage 2 of the Public Inquiry the unsuitability is considered unjustifiable, then the site will be placed in the appropriate category depending on its scorings against the ten factors.

6.6 The categories are as follows:

- Category A. Sites which score +2 against RDS directions and which have no negative scores. Sites which score 'A' against other factors.
- Category B. Sites which score +2 against RDS directions and which have one negative score.
- Category C. Sites which score +2 against RDS directions and which have two negative scores.
- Category D. Sites which score +2 against RDS directions and which have three negative scores.
- Category E. Sites which score +2 against RDS directions and which have four negative scores.
- Category F. Sites which score +2 against RDS directions and which have five negative scores.
- Category G. Sites which score +2 against RDS directions and which have six negative scores.
- Category H. Sites which score +1 against RDS directions and which have no negative scores.
- Category I. Sites which score +1 against RDS directions and which have one negative score.
- Category J. Sites which score +1 against RDS directions and which have two negative scores.
- Category K. Sites which score +1 against RDS directions and which have three negative scores.
- Category L. Sites which score +1 against RDS directions and which have four negative scores.
- Category M. Sites which score +1 against RDS directions and which have five negative scores.

- Category N. Sites which score +1 against RDS directions and which have six negative scores.
- Category P. Sites which score 0 against RDS directions and which have no negative scores.
- Category Q. Sites which score 0 against RDS directions and which have one negative score.
- Category R. Sites which score 0 against RDS directions and which have two negative scores.
- Category S. Sites which score 0 against RDS directions and which have three negative scores.
- Category T. Sites which score 0 against RDS directions and which have four negative scores.
- Category U. Sites which score 0 against RDS directions and which have five negative scores
- Category V. Sites which score 0 against RDS directions and which have six negative scores
- Category W. Sites which score -1 against the RDS directions and which have no other negative scores.
- Category Y. Sites which score -1 against the RDS directions and which have one other negative score.
- Category Z. Sites which score -1 against the RDS directions and which have two other negative scores.
- Category AZ. Sites which score -1 against the RDS directions and which have three negative scores.
- Category BZ. Sites which score -1 against the RDS directions and which have four other negative scores.
- Category CZ. Sites which score -1 against the RDS directions and which have five other negative scores.
- Category DZ. Sites which score -1 against the RDS directions and which have six other negative scores.

- 6.7 In bringing forward sites it is considered Category A sites are preferable to Category B and so on down to Category DZ.
- 6.8 Objection sites which do not abut any settlement development limit in BMAP are not generally included in this assessment. Where however there are other objection sites which lie between the settlement development limit and the objection site then it may be included in this assessment.
- 6.9 In order to assist the Public Inquiry process in determining which categories should be brought forward for development each category is assigned an acceptability index. An index of 1 indicates those categories which it is considered need to be brought forward to meet the 'three year supply flexibility figure' as put forward by the Department. An index of 2 indicates those categories which it is considered need to be brought forward to meet higher growth figures. Should it be considered necessary individual categories can be further refined. Following Stage 2 of the Public Inquiry sites currently with an acceptability index of 1 may be moved down to acceptability index 2 as a result of other objections resulting on other housing potential being placed in higher categories.
- 6.10 For the purposes of identifying the amount and distribution of land to meet the Adjusted HGI each site has been assigned a yield based on an average density of 25 per hectare. The density figure for individual objection sites may however be refined by key site requirements to be discussed at Stage 2 of the Public Inquiry. In order to avoid double counting where there are over-lapping sites, the potential yield on the smaller sites is placed in brackets in the Appendices and is not taken account of in the overall total.
- 6.11 Appendix 1 contains a summary of the scorings for all relevant objection sites. The final column gives the category and acceptability

index. Appendix 2 provides more detail against each objection site. The site reference in the first column of the Appendices refers to the BMAP objection number. The order of the factors in the Appendices differs from that in Table 4.

- 6.12 The Department has received an objection which lies outside the Plan Area in Ards District which is included for consideration in the context of BMAP. Apart from this the Department considers that in the Metropolitan Urban Area there are no alternative sites which are not the subject of objection which are more appropriate for housing.

## **7.0 POTENTIAL YIELD**

- 7.1 Table 5 provides figures for the potential yield in the Metropolitan Urban Area. The figures in Column 5 take account of objection sites which the Department considers are suitable for meeting the Adjusted HGI against the Department's suggested 'additional three year supply flexibility' and which have an acceptability index of one.
- 7.2 The total potential yield in Column 5 of Table 5 is 1176 short of the 'additional three year supply flexibility' figure for the Metropolitan Urban Area in Table 1. This however could be off- set by potential housing yield from the following:
- Windfall including higher densities being achieved
  - Successful objections within the settlement development limits regarding a change of zoning.
- 7.3 Furthermore potential yield to meet higher levels of housing growth potential than that proposed by the Department could also arise from successful objections on sites currently considered to be unsuitable.

This includes sites which are currently considered to be too large in terms of urban form but where, following discussion at Stage 2 of the Public Inquiry, a part only of the site may be determined as suitable

**TABLE 5 – Potential Housing Yield in the Metropolitan Urban Area**

1 District	2 Potential Yield in BMAP	3 2006 Potential Yield	4 Potential Yield from additional greenfield sites	5 Potential Yield
<b>Belfast</b>				
Belfast	20,483	25,030	0	25,030
<b>Carrickfergus</b>				
Carrickfergus	3516	3755	1023	4778
<b>Castlereagh</b>				
Metropolitan Castlereagh	3565	4044	2482	6526
<b>Lisburn</b>				
Lisburn City	5475	6005	3509	9514
Metropolitan Lisburn	2435	2694	0	2694
<b>Total</b>	<b>7910</b>	<b>8699</b>	<b>3509</b>	<b>12,208</b>
<b>Newtownabbey</b>				
Metropolitan Newtownabbey	4740	5509	2863	8372
<b>North Down</b>				
Bangor	4472	4899	840	5739
Hollywood	411	472	0	472
<b>Ards</b>				
Ards			21	21
<b>Total</b>	<b>51,828 (includes windfall)</b>	<b>52,586 (includes windfall)</b>	<b>10,738</b>	<b>63,324(including 178 windfall units)</b>

## **8.0 PHASING**

8.1 Following on from Stage 1 of the Public Inquiry it is considered phasing of the sites which meet the 'additional three year supply flexibility' and which currently have an acceptability index of 1 is not necessary. Any further land which may be brought forward to meet recommended higher levels of growth should be placed in a later phase.

## **9.0 CONCLUDING SUMMARY**

9.1 By way of summary it is considered the amount and location of land to be brought forward in the adopted plan will take account of a number of factors including:

- The level of flexibility around the Adjusted HGI;
- The removal of sites zoned for housing in BMAP following the Public Inquiry process;
- The re zoning for housing of land which is currently zoned for an alternative use in BMAP following the Public Inquiry process;
- The inclusion of land for housing which is currently considered unsuitable for development following the Public Inquiry process;  
and
- The assessment by DRD of general conformity taking into account the level of over provision in relation to the Adjusted HGI.



## **SECTION 2**

### **10.0 THE APPROACH TO THE DISTRIBUTION OF HOUSING GROWTH POTENTIAL IN THE METROPOLITAN RURAL AREA**

- 10.1 As set out in the January 2007 paper the Department considers it appropriate to up-date the housing figures supplied in the Population and Housing Technical Supplement to take account of planning permissions granted since March 2003. Table 4 of the January 2007 paper is re-stated at Table 6 below which provides figures for the overall potential yield in the various settlements taking account of the 2006 Housing Land Availability Survey undertaken by the Department. Additional yield arising from development of sites outside of the urban footprints and not taken account of in BMAP is included in the updated figures.
- 10.2 As discussed at Stage 1 of the Public Inquiry it is not considered appropriate to carry out the following:
- A further urban capacity study;
  - An adjustment of the minimum and maximum densities on zoned and designated sites in BMAP;
  - A re-examination of all the remaining industrial land which is not the subject of objection with a view to re-zoning as housing;
  - A further full housing needs assessment;
  - A re-assessment of environmental designations;
  - A further windfall assessment;
  - A further Countryside Assessment; and
  - A further allowance to the open countryside and allocation to small settlements

The Broad Evaluation Framework, allocation to settlements, strategic directions in the RDS and phasing are addressed later in this paper.

**Table 6: Potential Housing Yield in the Metropolitan Rural Area**

<b>Settlement</b>	<b>Potential yield in BMAP</b>	<b>2006 potential yield</b>
<b>Towns</b>		
Ballyclare	2156	2269
Carryduff	1328	1443
Greenisland	915	969
Hillsborough	754	803
Moira	814	868
Whitehead	230	246
<b>Villages</b>		
Aghalee	100	125
Annahilt	92	105
Dromara	187	211
Drumbeg	76	85
Drumbo	6	8
Glenavy	354	492
Lower Ballinderry	129	176
Maghaberry	437	481
Milltown	155	163
Ravernet	5	33
Stoneyford	144	170
Upper Ballinderry	41	42
Ballyeaston	2	2
Ballynure	121	126
Ballyrobert	93	93
Cogry/kilbride	106	122
Doagh	312	360
Straid	87	88
Crawfordsburn	24	23
Groomsport	216	252
Helens Bay	54	82
Seahill	37	50
Moneyreagh	130	142
Small Settlements	507	620
Open Countryside	844	844
Windfall	190	8*
<b>Total</b>	<b>10646</b>	<b>11501</b>

\*This is the residual uncommitted windfall total. Windfall development granted planning permission since March 2003 is included in figures in rows above

10.3 The Department considers that any additional yield arising from successful objections to BMAP within the proposed settlement development limits may be a factor to be taken into account in the determination of the amount of additional land to be brought forward to meet the Adjusted HGI. This would particularly be the case where the level of additional potential yield arising from this is considered to be significant.

10.4 The Concluding Summary (Section 16.0) of the January 2007 paper identified the following key strategic factors associated with the distribution of housing growth potential in the Metropolitan Rural Area:

- The identified potential housing yield in 2006 is virtually the same as the Adjusted HGI figure for the Metropolitan Rural Area.
- The need to balance this potential housing need equilibrium with the opportunity to better address other strategic housing growth related factors such as RDS directions and the need for flexibility around the HGIs.
- The sequential approach to distributing housing growth potential across the various sectors of the Metropolitan Rural Area.
- The establishment of criteria (factors) to allow a revised future housing growth assessment at both strategic and site specific levels.
- The complexity of the various factors that can determine the ultimate extent of new housing land potential in the various constituent parts of the Metropolitan Rural Area.

Following on from the discussion at Stage 1 of the Public Inquiry it is considered that the following factor is also of relevance:

- The Department considers it appropriate to allow for flexibility around the Adjusted HGI up to a level of approximately 13,800 to take account of the 'additional three year supply flexibility'.

10.5 The approach to the distribution of housing growth in the Metropolitan Rural Area builds on the January 2007 paper and is set out in this section as follows:

- Factors to be taken into consideration in the allocation of future housing growth potential.
- Revised allocation.
- Site specific factors to be taken into consideration in the location of future housing growth potential.
- Assessment of site specific objection sites
- Potential Yield
- Phasing.
- Concluding Summary.

## **11.0 FACTORS TO BE TAKEN INTO CONSIDERATION IN THE ALLOCATION OF FUTURE HOUSING GROWTH POTENTIAL.**

11.1 The allocation process in BMAP for the Metropolitan Rural Area followed the sequential approach as set out in the RDS. It is considered the approach to identifying land to the distribution of housing growth potential to take account of the Adjusted HGI should follow the same sequence.

11.2 The RDS refers to maintaining a tension between the amount of housing within urban footprints and Greenfield sites and maximising the amount of housing within urban footprints. It is considered BMAP achieved an appropriate balance between urban capacity sites and Greenfield sites and that potential housing zoning within the urban footprints is maximised.

11.3 Consequently it is likely that any additional land for housing in response to the adjusted HGI will be located principally on Greenfield sites beyond the settlement development limits in BMAP.

11.4 It is considered the strategic distribution of housing growth potential should take account of a number of factors as set out below. The first two factors, RDS directions and the Broad Evaluation Framework were considered as part of the BMAP allocation process. The remaining factors are ones which were not fully taken into account in the BMAP process but which it is now considered are relevant to any resulting opportunity for increased housing growth.

1. **RDS directions.** The RDS refers to the significant planned expansion of seven small towns including Ballyclare, Carryduff and Moira which fall within the Metropolitan Rural Area. In particular the RDS indicates that with further growth Ballyclare will begin to take on the wider role of a main town. The RDS also makes reference to the consolidation of towns and villages and no large scale expansion of towns and villages in the BMA travel to work area. Overall it is considered that Ballyclare, Carryduff and Moira will be the main focus of additional growth.

2. **Revised Broad Evaluation Framework.** It is considered appropriate to carry out a further broad evaluation framework to include the three small towns of Hillsborough, Moira and Whitehead together with the 23 villages to assist in any revised allocation of growth to these settlements. The RDS does not require a ranking

of the tests and accordingly equal weight is given to each. In evaluating each settlement against the individual tests a broad scoring system based on a high (H), medium (M), low (L) and zero (0) has been used. The final score reflects the totality of the individual scores. The higher the score the more suitable a settlement is considered to be for growth.

Where a settlement scores zero under the environmental capacity test it is considered there is no potential for further growth and therefore the overall score given to that settlement will be zero.

A revised Broad Evaluation Framework is contained in Table 7. This remains broadly similar to the one in the January 2007 paper with the exception of Drumbeg which is now given a zero growth rating due to its location in the Lagan Valley Regional Park. Table 7 indicates that Carryduff and Ballyclare score high, Moira and Hillsborough together with the villages of Doagh, Dromara and Glenavy score medium. The towns of Greenisland and Whitehead and the villages of Drumbeg and Helen's Bay score a zero against the environmental test and therefore are indicated as having no potential for growth. All other settlements score low.

**Table 7. Revised Broad Evaluation Framework for the Metropolitan Rural Area**

Settlement	Resource Test	Environmental Capacity Test	Transport Test	Economic Development Test	Urban & Rural Character Test	Community Services Test	Social Equity Test	Score
<b>Towns</b>								
Hillsborough	M	H	M	M	L	M	M	M
Moira	M	M	H	H	L	M	M	M
Greenisland	M	O	M	M	L	M	M	O
Whitehead	H	O	M	M	L	M	M	O
Ballyclare	H	H	M	H	M	H	H	H
Carryduff	H	H	M	H	H	H	H	H
<b>Villages</b>								
Aghalee	M	L	L	L	L	M	L	L
Annahilt	L	H	L	L	M	L	L	L
Dromara	M	M	L	M	M	M	L	M
Drumbeg	L	O	L	L	L	L	L	O
Drumbo	L	L	L	L	M	L	L	L
Glenavy	M	M	M	M	M	M	L	M
Lower Ballinderry	L	H	L	L	M	L	L	L
Magheraberry	L	M	L	L	H	L	L	L
Milltown	L	L	L	L	L	L	L	L
Ravernet	L	M	L	L	L	L	L	L
Stoneyford	L	L	L	L	L	L	L	L
Upper Ballinderry	L	M	L	L	L	L	L	L
Ballyeaston	L	L	L	L	L	L	L	L
Ballynure	L	M	L	L	L	L	L	L
Ballyrobert	L	H	L	L	L	L	L	L
Cogry/Kilbride	L	M	L	L	L	L	L	L
Doagh	M	H	L	L	M	M	L	M
Straid	L	L	L	L	M	L	L	L
Crawfordsburn	L	L	M	L	L	L	L	L
Groomsport	L	L	L	L	L	L	L	L
Helen's Bay	L	O	M	L	L	L	L	O
Seahill	L	M	M	L	L	L	L	L
Moneyreagh	L	H	L	L	M	L	L	L

3. **Age of Extant Plans** It is considered the time that has elapsed since the last review of a statutory plan is a factor to take into account in allocating any extra housing growth potential to settlements. Where it is some time since a plan was reviewed there may be reason to consider allocating additional housing growth to some of the settlements included in the area covered by such a

plan. Table 8 provides details of the last review of relevant extant plans.

**Table 8. Review of Relevant Statutory Development Plans**

District Council Area	Extant Plan	Time of Review
Belfast	Belfast Urban Area Plan (BUAP)	1990
Newtownabbey	Newtownabbey Area Plan (NAP)	1993 (Plan never adopted. Modifications were published but did not go to Public Inquiry.
Lisburn	Lisburn Area Plan	2001
Castlereagh	Carryduff Local Plan (no statutory plan for the District)	1988
Carrickfergus	Carrickfergus Area Plan	2000
North Down	North Down and Ards Area Plan	1984

The districts where it is considered the length of time since the last review is a factor are Belfast, Newtownabbey, North Down and Castlereagh.

4. **Land removed from the extant plans** Ballyclare is the only town in the Metropolitan Rural Area where a significant amount of zoned land was removed in BMAP to take account of the HGI in the RDS. It is considered this accounts for some 19.5 hectares which at an average density of 25 per hectare would yield approximately 500 dwellings. It is considered that additional housing growth should be allocated to Ballyclare to reflect this.
5. **Infrastructure.** It is considered that housing growth potential should be allocated to areas where additional growth will assist in the



provision of identified infrastructural requirements. BMAP contains a proposal for a non strategic road scheme in Ballyclare, Proposal BE 14 the Ballyclare Relief Road, which aims to provide traffic relief in Ballyclare town centre and facilitate housing development. The road is to be funded in the main by developer contributions. It is considered additional housing growth in Ballyclare will increase potential for delivery of the road and allow housing to take advantage of the road scheme.

**6. Council Views.** The Department considers the views of the Councils should be taken into account in allocating housing growth potential to settlements. The views of the various Councils from the consultation process associated with the publication of BMAP are given below.

- Carrickfergus Borough Council – Do not identify any strategic direction for further growth.
- Newtownabbey Borough Council – Identify Ballyclare and the villages as requiring further growth. However it is acknowledged that some villages may be more appropriate for further growth than others.
- North Down Borough Council – Do not identify any strategic direction for further growth.
- Castlereagh Borough Council – Identify Carryduff, Moneyreagh and Crossnacreevy as requiring further growth.
- Lisburn City Council – identify all villages as requiring further growth.
- Belfast City Council – Further to Stage 1 of the Public Inquiry the Council has identified urban footprints as the strategic direction for further growth.

**7. Social housing.** The Housing Needs Assessment produced by the Northern Ireland Housing Executive and published in Technical Supplement 1 identifies the level of social housing need in the Plan

Area. Table 9 sets out the identified need in the towns and villages against the BMAP allocation for social housing. The figures for social housing need have been updated to 2006 and the shortfall figures correspondingly changed from the figures in the January 2007 paper. It is considered the allocation of housing growth potential should take into account any shortfall in the provision of social housing.

11.5 With reference to matters raised at Stage 1 of the Public Inquiry the Department would comment as follows:

- The Department is unaware of any relevant direction or guidance on strategic urban design as referred to in paragraph 35 of Planning Policy Statement 12 – Housing in Settlements and has not therefore included this as a factor.
- Paragraph 35 of PPS12 refers to the unlocking of strategic development opportunities. It is considered this has been taken account of in the allocation process and it is therefore not necessary to include this as a separate factor.
- It is considered the emphasis on the sequential approach in order to achieve sustainable development together with the focus on urban capacity sites in BMAP has taken account of the need for efficiency in the use of land as referred to in paragraph 4 of Planning Policy Statement 1 – General Principles.
- It is considered that the relevant City/Borough/District Councils are representative of the community and there is no requirement to consult further with individual community groups regarding the distribution of housing growth potential.

**Table 9: Social Housing in the Metropolitan Rural Area**

Settlement	NIHE Housing Needs Assessment (HNA). Social Housing need within the Rural BMA.	Draft Plan allocation	Shortfall	HNA Sept 2006 (7 year projections)	Shortfall
<b>Towns</b>					
Ballyclare	10	-	10	64	64
Hillsborough/ Culcavey	32	9	23	67	56
Moira	17	-	17	30	30
Carryduff	47	15	32	25	10
Whitehead	5	-	5	7	7
Town Total	111	24	87	193	167
<b>Villages</b>					
Aghalee	2	-	2	0	
Annahilt	-	-	-	7	7
Dromara	4	-	4	0	0
Drumbo	4	-	4	0	0
Drumbeg/ Ballyskeagh/ Lambeg	98	-	98	90	90
Glenavy	19	-	19	0	0
Lower and Upper Ballinderry	2	-	2	17	17
Maghaberry	4	-	4	17	17
Ravernet (including Legacurry)	-	-	-	9	9
Stoneyford	5	-	5	5	5
Doagh	8	-	8	13	13
Ballynnure	3	-	3	6	6
Groomsport	30	-	30	69	69
Crawfordsburn/ Helen's Bay	10	-	10	0	0
Moneyreagh	8	-	8	0	0
Seahill	-	4*	-	0	0
Village/ Total	197	4	197	241	241
<b>TOTAL</b>	<b>308</b>	<b>28</b>	<b>284</b>	<b>434</b>	<b>408</b>

\*Note: Seahill was allocated 4 social houses which are not identified in the HNA.

11.6 Table 10 provides an evaluation of the towns and villages against each of the above seven factors which forms the basis of the allocation of housing growth potential to the settlements against the Adjusted HGI. In evaluating each factor a broad scoring system based on a high (H), medium (M), low (L) and zero (0) value has been used. The overall score in Column 8 of Table 10 reflects the totality of the individual scores. The overall score for some of the villages differs from those in the January 2007 paper as a result of changes to the figures for social housing. The overall score for each settlement needs to be set within the context of the relevant tier of that settlement. For example a high score for a town suggests the allocation of more housing growth potential than a high score for a village. Where a settlement has scored a zero against the broad evaluation framework then it is considered there is no potential for further expansion of the settlement development limit and the overall score for that settlement is therefore zero.

**Table 10. Assessment of towns and villages against the seven factors**

SETTLEMENT	(1) RDS Direction	(2) Revised Broad Evaluation framework	(3) Age of the extant plans	(4) land removed from the extant plans	(5) Infra - structure	(6) Council views	(7) social housing	(8) overall Score
<b>Towns</b>								
Ballyclare	H	H	H	H	H	H	H	H
Carryduff	M	H	H	0	L	H	L	M
Greenisland	L	0	L	0	L	0	0	0
Hillsborough	L	M	L	0	L	0	H	L
Moira	M	M	L	0	L	0	H	L
Whitehead	L	0	L	0	L	0	L	0
<b>Villages</b>								
Aghalee	0	L	L	0	L	H	0	L
Annahilt	0	L	L	0	L	H	L	L
Dromara	0	M	L	0	L	H	0	L
Drumbeg	0	0	L	0	L	H	H	0
Drumbo	0	L	L	0	L	H	0	L
Glenavy	0	M	L	0	L	H	0	L
Lower Ballinderry	0	L	L	0	L	H	L	L
Maghaberry	0	L	L	0	L	H	M	L
Milltown	0	L	L	0	L	H	0	L
Ravernet	0	L	L	0	L	H	L	L
Stoneyford	0	L	L	0	L	H	L	L
Upper Ballinderry	0	L	L	0	L	H	L	L
Ballyeaston	0	L	H	0	L	H	0	L
Ballynure	0	L	H	0	L	H	L	L
Ballyrobert	0	L	H	0	L	H	0	L
Cogry/kilbride	0	L	H	0	L	H	0	L
Doagh	0	M	H	0	L	H	L	L
Straid	0	L	H	0	L	H	0	L
Crawfordsburn	0	L	H	0	L	0	0	L
Groomsport	0	L	H	0	L	0	H	L
Helens Bay	0	0	H	0	L	0	0	0
Seahill	0	L	H	0	L	0	0	L
Moneyreagh	0	L	H	0	L	H	0	L

## 12.0 REVISED ALLOCATION

12.1 The process of allocating housing growth potential in the Metropolitan Rural Area is as follows:

- Stage 1. An initial revised allocation based on the Adjusted HGI of 11,700.
- Stage 2. An adjustment to take account of factors not fully reflected in the initial allocation.
- Stage 3. A second adjustment to address any imbalance between the different tiers of settlement taking account of the 2006 yield.
- Stage 4. A third adjustment to take account of the 'additional three year supply flexibility'. This stage is additional to the

process as set out in the January 2007 paper and reflects the Department's approach presented at Stage 1 of the Public Inquiry.

**Stage 1.**

- 12.2 In light of directions in the RDS it is considered the proportion of growth to towns should be maintained at a level which is at least 60% of the overall allocation (the proportion in BMAP) and if possible increased. It is further considered that, in view of the identified infrastructural requirements and the age of the extant plan the relative proportion of housing growth to Ballyclare should increase. In view of environmental constraints it is considered that no additional housing growth should be allocated to Greenisland and Whitehead. Carryduff and Moira should at least maintain their respective proportions and the remaining town of Hillsborough should maintain its relative proportion of housing growth.
- 12.3 It is considered that in light of the directions in the RDS the proportion of growth to the village tier should not increase and should remain at about 27% of the overall allocation. In view of environmental constraints it is considered that no additional housing growth should be allocated to Drumbeg and Helens' Bay. Further to the January 2007 paper it is now considered that due to the similarity in scores for all villages in Table 10 it is considered they all should retain their proportion of the overall allocation.
- 12.4 The allocation to the small settlements in BMAP was based on housing potential from committed sites and sites suitable for housing. In view of the existing potential for development and the role and function of small settlements it is considered the allowance to this tier of settlement should reflect current commitments only.
- 12.5 The allowance to the open countryside in BMAP was mainly based on past trends. It is considered there is no requirement to re-assess this figure. It is also considered that as all open countryside in BMAP is

designated as Greenbelt it is not appropriate to make any adjustment to the allocation to settlements as a result of Draft Planning Policy Statement 14.

12.6 Columns 1 – 5 of Table 11 contain a revised allocation to settlements based on the above.

### **Stage 2.**

12.7 It is considered the figures in Column 5 of Table 11 do not fully take into account the following;

- The amount of land removed from Ballyclare in BMAP
- The provision of the Ballyclare Relief Road.
- Growth to Carryduff in light of its score against the seven factors.

12.8 In view of the above an adjusted allocation has been made as shown in column 6 of Table 11. Ballyclare and Carryduff have been allocated further additional growth.

### **Stage 3.**

12.9 Column 7 of Table 11 provides figures for the potential housing yield in settlements based on the 2006 Land Availability Monitor. The level of commitments in the village tier and the small settlements is above the allocated figure in Column 6. It is therefore considered appropriate to allocate further additional housing growth to the town tier in order to maintain the relative proportions between the town and village tiers. Column 8 of Table 11 contains a second adjusted allocation which increases the amount of housing growth potential in Carryduff and Ballyclare, the two towns with the highest scores. The second adjusted allocation is approximately 7% in total over the Adjusted HGI.

#### **Stage 4.**

12.10 Column 9 of Table 11 makes a third adjusted allocation to take account of the 'additional three year supply flexibility' around the Adjusted HGI. Additional growth is allocated to Ballyclare, Carryduff and Moira in light of their scores in Table 9. The allocation to Hillsborough is on a pro rata basis. The allocation to the villages is based on a pro rata uplift maintaining the overall proportion in this tier at 27% of the total allocation. The allowance to the small settlements and open countryside is not increased. It is considered the third adjusted allocation to the Belfast Metropolitan Rural Area meets the relevant directions in the RDS and takes account of other important considerations. The quantum of land to be brought forward in light of the Adjusted HGI and the 'additional three year supply flexibility' is that required to meet the total in Column 10 of Table 11 (the figures in Column 10 equates to the difference between Column 9 and Column 7)

#### **Other Considerations.**

12.11 It is considered any further allocation beyond the 'additional three year supply flexibility' in Column 9 of Table 11 should not be made solely on a pro rata basis but should take account of the factors in Table 10 with a particular focus on the town tier.



**Table 11: Revised allocation to Settlements in the Metropolitan Rural Area**

1. Settlement	2. BMAP Yield (inc. windfall*)	3. Percentage of allocation in BMAP	4. Score against the relevant factors	5. Revised allocation (uplift)	6. Adjusted allocation	7. Potential yield 2006	8. Second allocation
<b>Towns</b>							
Ballyclare	2206*(50)	21%	H	2676 (470)	2800	2269	2956
Carryduff	1398*(70)	13%	M	1521 (123)	1571	1443	1671
Greenisland	985*(70)	9%	0	985 (0)	985	969	969
Hillsborough	754	7%	L	819 (65)	819	803	819
Moira	814	8%	L	936 (122)	936	868	936
Whitehead	230	2%	0	230 (0)	230	246	246
<b>Total</b>	<b>6387</b>	<b>60%</b>		<b>7167 (780)</b>	<b>7341</b>	<b>6598</b>	<b>7591</b>
<b>Villages</b>							
Aghalee	100	0.90%	L	110 (10)	110	125	125
Annahilt	92	0.90%	L	101 (9)	101	105	105
Dromara	187	2%	L	206 (19)	206	211	211
Drumbeg	76	0.70%	0	76 (0)	76	85	85
Drumbo	6	0.10%	L	7 (1)	7	8	8
Glenavy	354	3.30%	L	389 (35)	389	492	492
Lower Ballinderry	129	1.20%	L	142 (13)	142	176	176
Maghaberry	437	4%	L	480 (43)	480	481	481
Milltown	155	1.50%	L	170(15)	170	163	170
Ravernet	5	0.05%	L	5 (0)	5	33	33
Stoneyford	144	1.40%	L	158 (14)	158	170	170
Upper Ballinderry	41	0.40%	L	45 (4)	45	42	45
Ballyeaston	2	0.02%	L	2 (0)	2	2	2
Ballynure	121	1.10%	L	133 (12)	133	126	133
Ballyrobert	93	0.90%	L	102 (9)	102	93	102
Cogry/kilbride	106	1%	L	116 (10)	116	122	122
Doagh	312	3%	L	343 (31)	343	360	360
Straid	87	0.80%	L	96 (9)	96	88	96
Crawfordsburn	24	0.20%	L	26 (2)	26	23	26
Groomsport	216	2%	L	237 (21)	237	252	252
Helens Bay	54	0.50%	0	54 (0)	54	82	82
Seahill	37	0.30%	L	41 (4)	41	50	50
MONEYREAGH	130	1.20%	L	143 (13)	143	142	143
<b>Total</b>	<b>2908</b>	<b>27%</b>		<b>3182 (274)</b>	<b>3182</b>	<b>3431</b>	<b>3466</b>
Small Settlements	507	5%		507	507	620	620
Open Countryside	844	8%		844	844	844	844
<b>Overall Total</b>	<b>10646</b>	<b>100%</b>		<b>11700 (1054)</b>	<b>11874</b>	<b>11493</b>	<b>12521</b>

### **13.0 SITE SPECIFIC FACTORS TO BE TAKEN INTO CONSIDERATION IN THE LOCATION OF FUTURE HOUSING GROWTH POTENTIAL**

13.1 The Department has identified a number of factors to be used to assess the suitability of individual sites for future housing growth above that which is already accommodated for in BMAP.

13.2 The first two factors are considered to be determining obstacles to housing development suitability. The last six factors are used to make judgements between those sites which are not excluded on the basis of the first two factors. At the strategic stage of The Public inquiry various levels of housing growth were discussed. In order to facilitate identification of the quantum of land to meet these various levels the assessment of sites against the last six factors includes a scoring system which allows judgements to be made between sites.

**1. Environmental designations.** Some land adjoining the settlement development limits in BMAP is the subject of proposed environmental designations which include

- Areas of High Scenic Value
- Sites of Local Nature Conservation Importance
- Local Landscape Policy Areas
- The Lagan Valley Regional Park
- The Coastal Area

The Department considers objection sites which are the subject of one or more of the above environmental designations are not suitable for future housing growth.

**2. Constraints on development.** The Department has consulted with statutory consultees regarding roads, water and sewerage and

drainage. Where the replies have indicated a constraint to development the site is considered to be not suitable for future housing growth.

- 3. Site Analysis.** This factor, which is further to the January 2007 paper and reflects discussion at Stage 1 of the Public Inquiry, relates to the characteristics of the site including topography and vegetation.
- 4. Northern Ireland Electricity Power Lines.** This factor is further to the January 2007 paper and reflects discussion at Stage 1 of the Public Inquiry. Whilst the presence of power lines is not considered to be a total constraint to development an assessment has been made of the impact such power lines have on individual sites
- 5. Compact Urban form.** Objection sites should result in a compact urban form and should not lead to an excessive amount of growth in any one direction. Sites which abut the settlement development limits in BMAP will be considered preferable to those which do not abut the limit.
- 6. Definition of Settlement Development Limits.** Where the settlement development limit in BMAP follows a well defined physical boundary including a major road, river or other physical feature then breach of that boundary to allow for growth will not be the preferred option if other sites that can more readily be absorbed into the urban form are available.
- 7. Social housing.** As the Department has been unable to distinguish between relevant objection sites against this factor all sites have been scored the same.

**8. Other matters (comments).** This includes matters not addressed in the above factors and will include planning history, existing built form and other matters which the Department considers material to the assessment of individual sites. Some other matters may come to light during Stage 2 of The Public Inquiry.

#### 14.0 ASSESSMENT OF SITE SPECIFIC OBJECTIONS

14.1 In order to assist the Public Inquiry process regarding the distribution and quantum of land which is considered suitable for housing development across the Metropolitan Rural Area the Department has assessed all relevant objection sites against the above eight factors. A scoring system has been used against each factor as shown in Table 12.

**Table 12 Scoring of Objection sites in the Metropolitan Rural Area**

FACTOR		SCORE						Unacceptable
1	Environmental Designations							X
2	Constraints on Development							X
3	Site Analysis			0	-1	-2		X
4	NIE Power lines			0	-1			
5	Compact Urban Form		+1	0	-1			X
6	Definition of Settlement Development Limit		+1	0	-1			X
7	Social Housing		+1	0	-1			
8	Other matters	+2	+1	0			A	X

14.2 The scoring system is as set out in paragraph 6.2

14.3 Where an objection site is scored as unsuitable against any of the six factors against which an unsuitable score is possible, then generally the site overall is considered unsuitable for development. Exceptionally where 'other matters' are considered to be determining in favour of development then an objection site will be scored as 'A' against this factor and this will outweigh any other unsuitable scores for the site.

14.4 Objection sites which are not scored as unsuitable for development against any of the above factors have been placed in a category which reflects the overall score against the factors. The Department considers there are two main methods of placing sites into categories as follows:

1. Adding the individual scores against each factor and basing the categories on the final scores.
2. Basing the categories on the number of positive and negative scores against the individual factors.

The Department is of the opinion that both methods are acceptable but that the second method is preferable as it is a more 'in the round' approach. Furthermore not all objection sites have been scored against all the factors. A site is only scored against 'other factors' where there is a relevant comment. Sites which do not abut the development limit are not scored against Factor 6.

14.5 Where an objection site is deemed unsuitable for development against any factor and where, following discussion at Stage 2 of the Public Inquiry the unsuitability is considered unjustifiable, then the site will be placed in the appropriate category depending on its scorings against the factors.

14.6 The categories are as follows:

- Category A. Sites which do not have any negative scores. Sites which have an 'A' score against other factors; this includes sites in small settlements.
- Category B. Sites which have one negative score.
- Category C. Sites which have two negative scores.
- Category D. Sites which have three negative scores.
- Category E. Sites which have four negative scores.
- Category F. Sites which have five negative scores.

14.7 In bringing forward sites it is considered Category A sites are preferable to Category B and so on down to Category F.

14.8 In respect of the village tier provided the overall proportion of growth does not exceed the 27% it is considered that where in a particular village objection sites are not sufficient to meet the allocation in Table 10 sites in other villages may be acceptable to make up the difference. This will not however be applicable at the town tier.

14.9 Objection sites which do not abut any settlement development limit in BMAP are not generally included in this assessment. Where however there are other objection sites which lie between the settlement development limit and the objection site then it may be included in this assessment.

- 14.10 In order to assist the Public Inquiry process in determining which categories should be brought forward for development each category is assigned an acceptability index. An index of 1 indicates those categories which it is considered need to be brought forward to meet the 'additional three year supply flexibility' as put forward by the Department. An index of 2 indicates those categories which it is considered need to be brought forward to meet higher growth figures. Should it be considered necessary individual categories can be further refined. Following Stage 2 of the Public Inquiry sites currently with an acceptability index of 1 may be moved down to acceptability index 2 as a result of other objections resulting in other housing potential being placed in higher categories.
- 14.11 For the purpose of identifying the amount and distribution of land to meet the Adjusted HGI each site has been assigned a yield based on an average density of 25 per hectare. The density figure for individual objection sites may however be refined by key site requirements to be discussed at Stage 2 of the Public Inquiry. In order to avoid double counting, where there are over-lapping sites, the potential yield on the smaller sites is placed in brackets in the Appendices and is not taken account of in the overall total.
- 14.12 Appendix 3 contains a summary of the scorings for all relevant objection sites. The final column gives the category and acceptability index. Appendix 4 provides more detail against each objection site. The site reference in the first column of the Appendices refers to the BMAP objection number. The order of the factors in the Appendices differs from that in Table 12.
- 14.13 The Department considers that in the Metropolitan Rural Area there are no alternative sites which are not the subject of objection which are more appropriate for housing.

## 15.0 POTENTIAL YIELD

- 15.1 Table 13 provides figures for the potential yield in the Metropolitan Rural Area. The figures in Column 5 take account of objection sites which the Department considers are suitable for meeting the Adjusted HGI against the Department's suggested 'additional three year supply flexibility' and which have an acceptability index of one.
- 15.2 Where the figures in Columns 4 and 5 of Table 13 are asterisked this indicates that the yield is significantly over that shown in Column 3. In the case of the villages this results from there being only one acceptable objection site in the settlement but which, due to its size, has a potential yield in excess of what is required to meet the allocation in Column 3. Exclusion of such sites would leave those villages without any sites which are considered suitable for development. In the case of Ballyclare the over provision results from the inclusion of a large site which if excluded would leave the town with a significant under provision against its allocation.
- 15.3 Whilst the total potential yield in Column 5 of Table 13 is above the 'additional three year supply flexibility' figure for the Metropolitan Rural Area in Table 1 it is not of a level which the Department considers is significant.
- 15.4 Additional yield may arise from the following:
- Windfall including higher densities being achieved
  - Successful objections within the settlement development limits regarding a change of zoning.
- 15.5 Furthermore potential yield to meet higher levels of housing growth potential than that proposed by the Department could also arise from



successful objections on sites currently considered to be unsuitable.

This includes sites which are currently considered to be too large in terms of urban form but where a part only of the site may be determined as suitable.

**TABLE 13: Potential Yield in the Metropolitan Rural Area**

1 Settlement	2 BMAP yield (% of total yield)	3 Potential Yield in 2006	3 Allocation (Column 9 of Table 11)	4 Yield from Additional sites	5 Total Potential Yield
<b>Towns</b>					
Ballyclare	2206(21%)	2269	3400	1705*	3974* (28)
Carryduff	1398 (13%)	1443	1941	575	2018 (14%)
Greenisland	985 (9%)	969	969	0	969 (7%)
Hillsborough	754 (7%)	803	902	101	904 (6%)
Moira	814 (8%)	868	1072	98	966 (7%)
Whitehead	230 (2%)	246	246	0	246 (2%)
<b>Total</b>	<b>6387 (60%)</b>	<b>6598</b>	<b>8530</b>	<b>2479</b>	<b>9057 (63%)</b>
<b>Villages</b>					
Aghalee	100	125	138	0	125
Annahilt	92	105	116	23	128
Dromara	187	211	232	23	234
Drumbeg	76	85	85	0	85
Drumbo	6	8	9	0	8
Glenavy	354	492	542	64	556
Lower Ballinderry	129	176	194	30	206
Maghaberry	437	481	530	60	541
Milltown	155	163	187	0	163
Ravernet	5	33	36	83*	116*
Stoneyford	144	170	187	0	170
Upper Ballinderry	41	42	50	0	42
Ballyeaston	2	2	2	0	2
Ballynure	121	126	147	15	141
Ballyrobert	93	93	112	1	94
Cogry/Kilbride	106	122	134	39	161
Doagh	312	360	397	123*	483*
Straid	87	88	106	0	88
Crawfordsburn	24	23	29	0	23
Groomsport	216	252	278	0	252
Helen's Bay	54	82	82	0	82
Seahill	37	50	55	0	50
Moneyreagh	130	142	158	0	142
<b>Total</b>	<b>2908 (27%)</b>	<b>3431</b>	<b>3806</b>	<b>461</b>	<b>3892 (27%)</b>
<b>Small Settlements</b>					
Small Settlements	507	620	620	-	620
<b>Open Countryside</b>					
Open Countryside	844	844	844	-	844
<b>Overall Total</b>	<b>10646</b>	<b>11493</b>	<b>13800</b>	<b>2940</b>	<b>14,433</b>

## **16.0 PHASING**

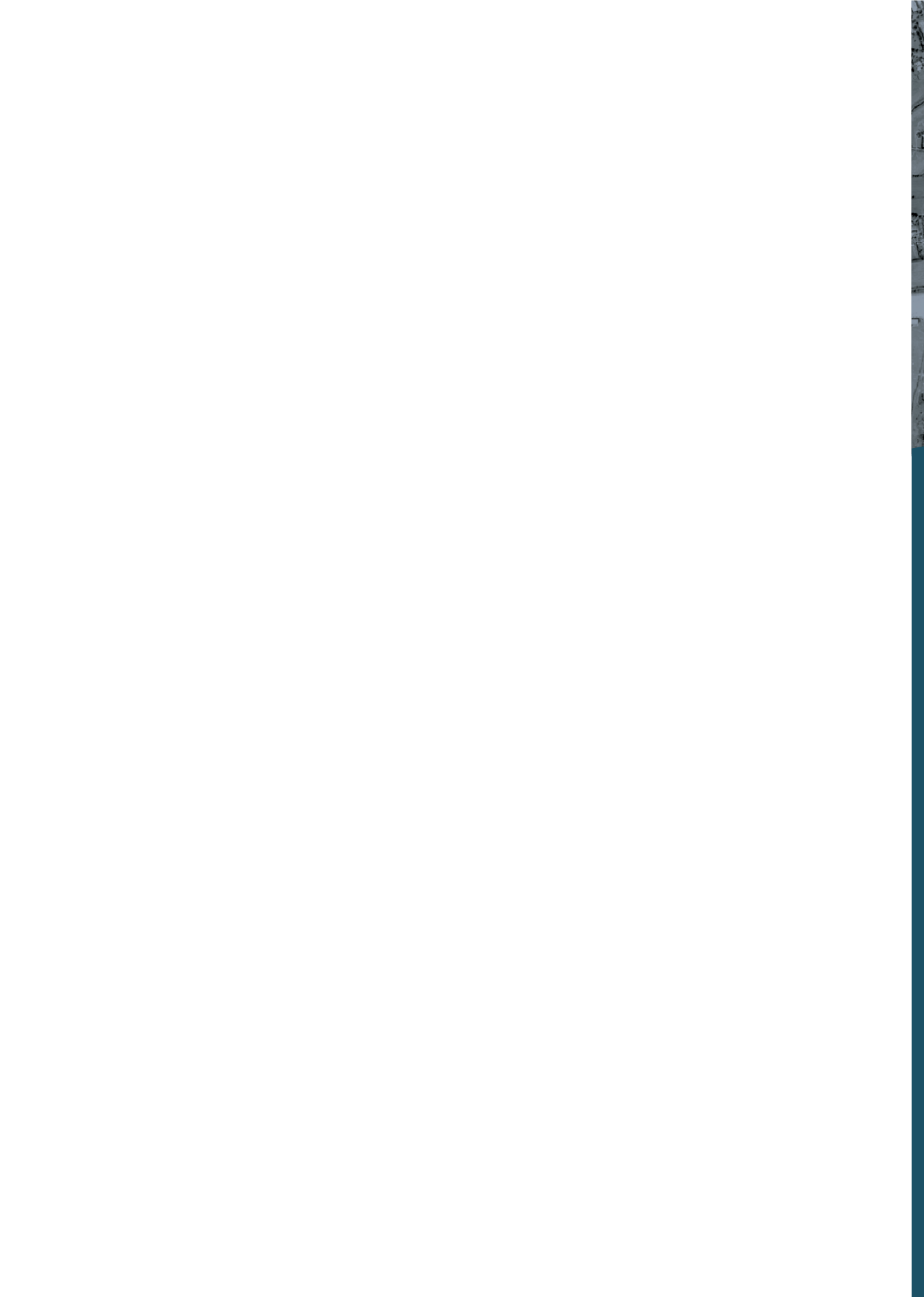
16.1 Following on from Stage 1 of the Public Inquiry it is considered phasing of the sites to meet the 'additional three year supply flexibility' and which have an acceptability index of one is not necessary in any of the settlements. Any further land which may be brought forward to meet recommended higher levels of growth should be placed in a later phase.

## **17.0 CONCLUDING SUMMARY**

17.1 By way of summary it is considered the amount and location of land to be brought forward in the adopted plan will take account of a number of factors including:

- The level of flexibility around the Adjusted HGI;
- The removal of sites zoned for housing in BMAP following the Public Inquiry process;
- The re zoning for housing of land which is currently zoned for an alternative use in BMAP following the Public Inquiry process;
- The inclusion of land for housing which is currently considered unsuitable for development following the Public Inquiry process;
- and
- The assessment by DRD of general conformity taking into account the level of over provision in relation to the Adjusted HGI.







## ANNEX 4

MOIRA ROAD

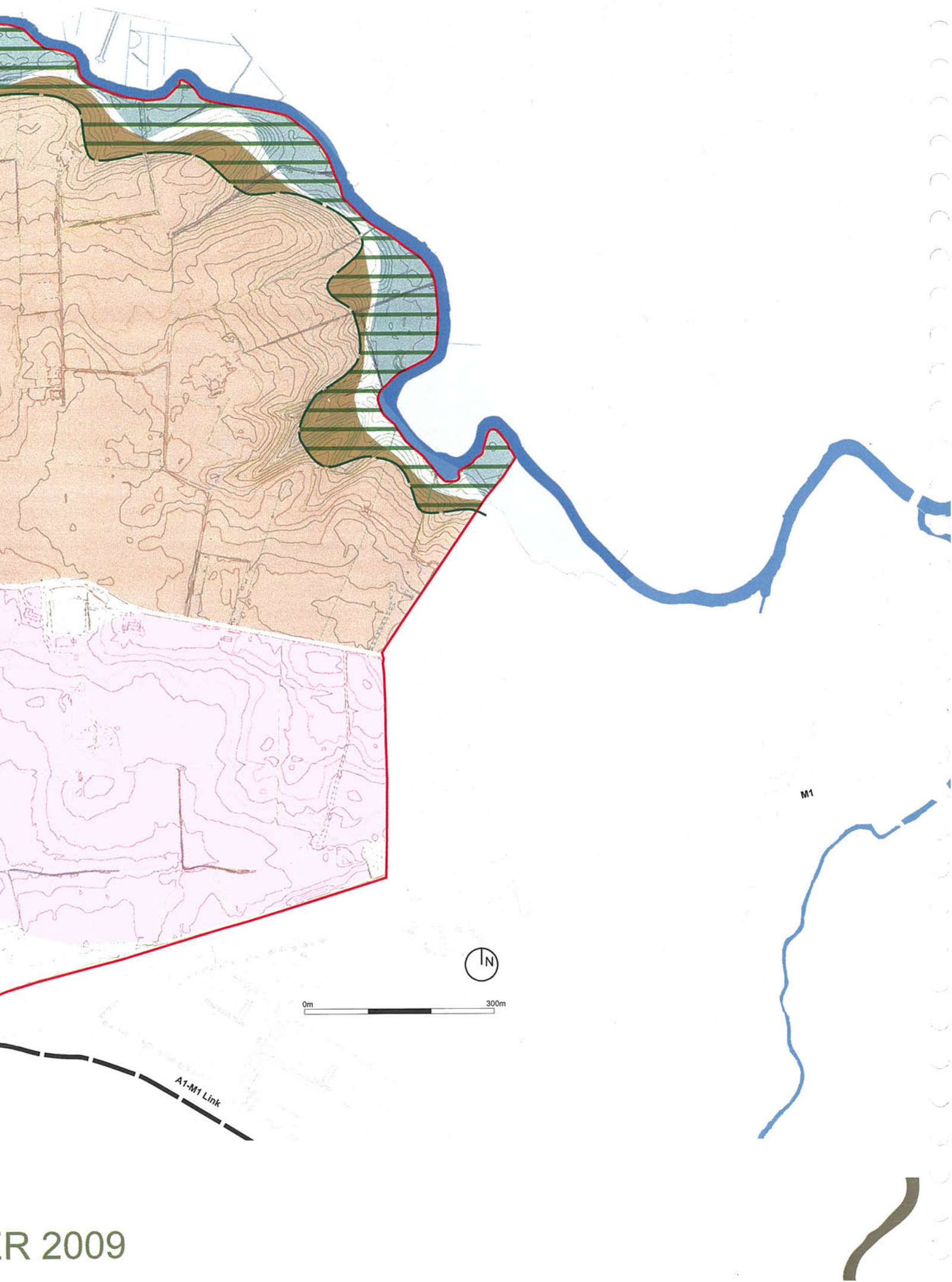
BLARIS ROAD

M1

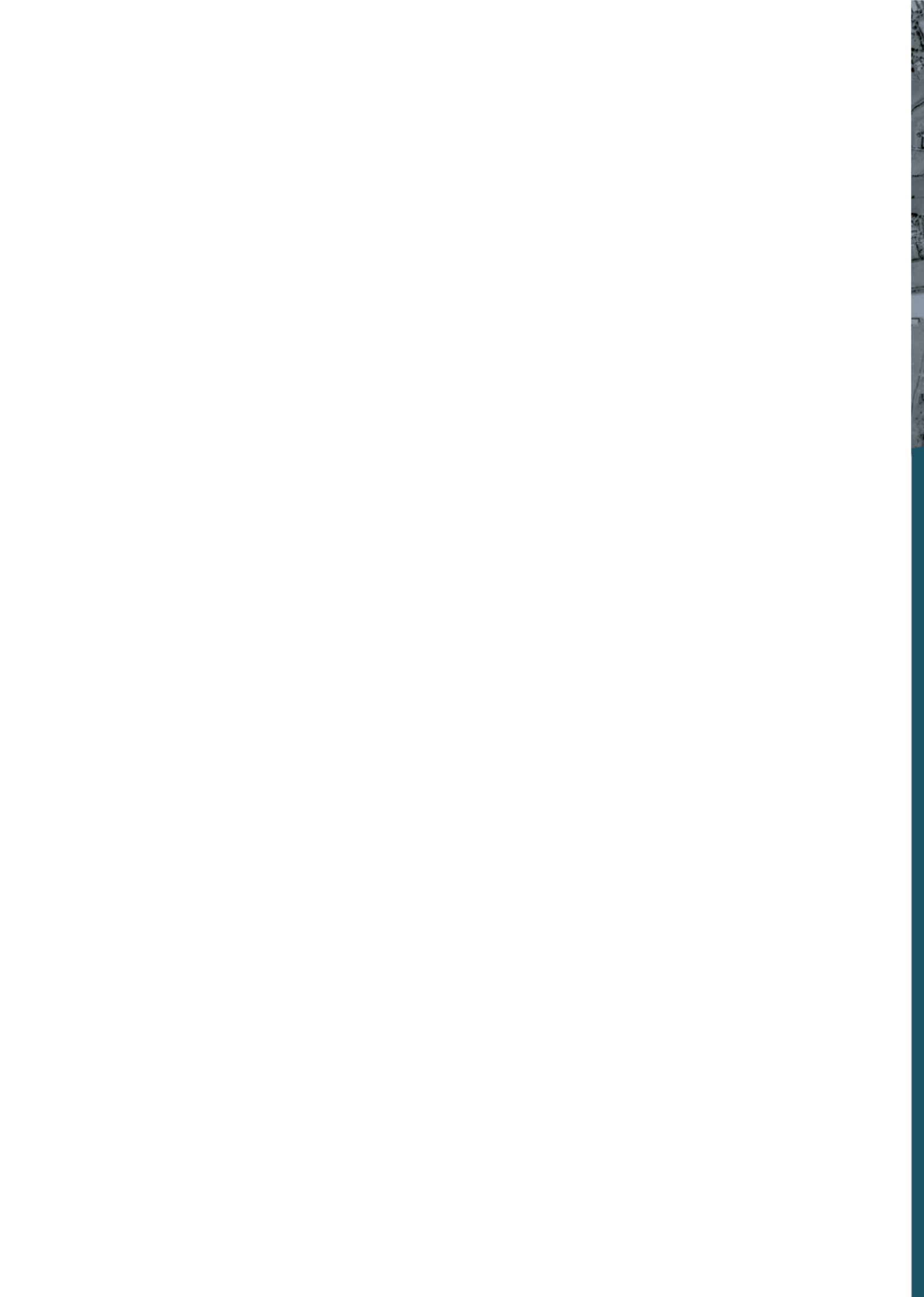
Key

- Site
- Lands in Blaris Development Partnership's control, beyond agreed settlement limit
- M1-Knockmore link road
- Residential
- Commercial
- Floodplain
- Agreed extent of LLPA
- Development Settlement Limit

# BLARIS FINAL DEVELOPMENT FRAMEWORK - OCTOBER



R 2009







## ANNEX 5

# MEETING NOTE

**TURLEYASSOCIATES**

41-43 Waring Street  
Belfast  
BT1 2DY

**T : 028 9023 5435**

F : 028 9023 4075

**www.turleyassociates.co.uk**

<b>Client:</b>	Snoddons/Killultagh	
<b>Project:</b>	Lands at Blaris, Lisburn	
<b>File Ref:</b>	SNOB0006	
<b>Meeting Date:</b>	14 February 2008	
<b>Venue:</b>	Planning Service HQ	
<b>Present:</b>	Tom Clarke Al Adair Damien Mulligan Clyde Shanks Gavin Rolston	Planning Service; Strategic Projects Team Planning Service; BMAP Manager Planning Service; Strategic Projects Team TA TA
<b>Circulation:</b>	TA file, client	

## Notes

1. CS outlined his understanding of where the Department was in terms of thinking on the Blaris lands from what had been agreed at the BMAP hearing. CS believed there was a very strong strategic policy context for the proposals at Blaris and that there was general agreement on the proposed settlement limit and the make up of the uses within the site.
2. AA agreed although he was concerned about the difference between the red line in the application and the extent of the BMAP objection.
3. CS advised that red line in application stretched further to the west than the BMAP objection purely as all lands controlled by the client had been included. CS believed that the client would be content to reduce the red line of the application site to reflect that within the BMAP objection, as no development was proposed within this area.
4. In respect of the current Article 31 planning application, CS was keen to commence work on the development framework for the site and felt this could be delivered through the existing application. CS wished to take the same collaborative workshop approach to the

## Action

preparation of the framework as was used in other schemes that TA was involved in, eg. Redevelopment of Sirocco works. CS felt that once this was agreed the further environmental information requested could be provided in the form of an ES Addendum.

5. CS queried delivery of detailed elements of scheme prior to PAC reporting back to Planning Service, given objection to Blaris site through BMAP. AA felt that a phase of housing being brought forward at this stage would not be prejudicial to BMAP due to strategic position of Lisburn in settlement hierarchy as set out in the RDS. AA agreed that detailed framework should be prepared but that areas within this that had been objected to should be indicated as being held back until adoption of Plan. AA advised that Lisburn City Council position was agreement other than on Open Space provision and extent of the site.
6. CS believed that this could be satisfactorily addressed. CS believed there was a lack of certainty from NI Water over programme of future infrastructure works across Lisburn. This is something that must be addressed and has implications for sites other than Blaris.
7. TC requested that current planning application be withdrawn. TC felt that it was not progressing and if environmental information was not forthcoming Planning Service may have to decide application on information provided to date. TC did, however, agree to arrange workshop to take forward development framework document. CS did not agree that application should be withdrawn and felt that once there was agreement on the development framework the requested environmental information could be provided.

*GR*

# MEETING NOTE

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<b>Client:</b>	Snoddons/Killultagh	
<b>Project:</b>	Lands at Blaris, Lisburn	
<b>File Ref:</b>	SNOB0006	
<b>Meeting Date:</b>	21 May 2008	
<b>Venue:</b>	Planning Service HQ	
<b>Present:</b>	Tom Clarke Damien Mulligan Clyde Shanks Gavin Rolston Sam Harris Brian Snoddon Richard Steenson Brendan Boyd	Planning Service; Strategic Projects Team Planning Service; Strategic Projects Team TA TA Snoddons Snoddons Killultagh Killultagh
<b>Circulation:</b>	TA file	

## Notes

- CS commenced by setting out the issues to be covered in the meeting:
  - Current outline application (S/2006/0443/O);
  - BMAP position;
  - Development Framework;
  - Programme going forward.
- By way of background, CS explained the approach to date, including the submission of the outline planning application. CS believed that Planning Service would prefer to approach the Blaris site in a similar manner to that used for the Titanic Quarter development at Queen's Island, ie. the preparation of a Development Framework Document to guide future applications.

## Action

3. TC confirmed Planning Service's position that master planning is critical to a site as large and strategically important as Blaris. TC felt that through the Master Planning process it would become clear what applications can come forward before, and what areas will have to wait until after the completion of the BMAP process. TC advised that Planning Service is happy to engage in the Development Framework process once outline application was withdrawn. However, it was ultimately up to the applicant to decide whether or not to proceed in the manner suggested by Planning Service.
4. SH queried what the benefit of the Development Framework approach was and whether it was as strong as having planning permission.
5. TC advised that it is not a planning permission, but rather an agreement with Planning Service as to the type and disposition of uses across the site. The document would then be used as a tool to assess applications that come forward for discrete areas of the site. If applications conformed to the Development Framework then the application process should be swift and uncontroversial.
6. CS envisaged a tight timeframe for the preparation of the Development Framework. TA, along with a team of consultants would pull together a draft Development Framework which would then be refined through a number of meetings with Planning Service and their consultees. In parallel with this, once the broad disposition of uses had been agreed, detailed applications for early phases would be prepared, with submission some time in early 2009. The Development Framework could use the CMP from the outline application as a starting point as it was broadly in line with the mix and location of uses agreed with Planning Service at the BMAP Public Inquiry. TC agreed with this proposed approach.
7. SH queried what information would be contained within the Development Framework Document.
8. TC tabled the Development Framework Document prepared for Titanic Quarter. It was prepared to guide the detailed applications that are now coming forward. It includes an agreed block structure, access points etc. All Departmental bodies signed off on it as an agreed framework. DM advised that the CMP plan from the current outline application was close to being a Development Framework.
9. RS asked whether it was conceivable that full applications for phases of, for example, housing could be approved prior to the adoption of BMAP.
10. TC confirmed that they could come forward as the Plan Process could not be allowed to stifle development completely. It was a balancing act for Planning Service; if an application was not prejudicial to BMAP then it could be approved, subject to detailed consideration and conformity with the Development Framework.
11. DM advised that once the Development Framework was underway that detailed

applications would be processed through the PADs procedure and this should be a relatively process given background work already undertaken.

12. CS queried whether an ES would be needed for every phase of development that can forward. DM indicated that it would depend on the scale of each application and they would be considered against the EIA Regulations as any other application would be.
13. SH queried the level of detail that would go into the Development Framework Document.
14. CS did not believe that there would be a significant degree of detail. There would be an explanation of the standard for roads etc that would be explained in the text and this would be agreed.
15. DM suggested that the first of the Development Framework meetings could take place in June and that F Cafolla would contact the consultees to arrange a suitable date. CS requested that SIB, Lisburn City Council and Translink be invited to the first meeting.
16. RS queried whether the withdrawal of the outline application would allow Planning Service to take their 'foot off the gas' as there would be no pressure on them to move forward quickly with the Development Framework Document.
17. TC advised that there was Ministerial pressure on Planning Service to take forward strategically important sites in a timely fashion to ensure major economic investment was not stifled.
18. CS asked if an A40 would be necessary, given the land control. TC confirmed that an A40 would be Planning Service's last resort due to the length of time it could potentially add to the Planning Process. Planning Service would use conditions to control development where possible.
19. CS believed that the Development Framework could identify infrastructure, such as land for a primary school and the laying out of open spaces, and how many units could be delivered before the infrastructure would be delivered.
20. CS thanked TC for his clear and constructive advice and agreed to write and confirm how they wished to proceed in due course.

*GR*

# MEETING NOTE

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<b>Client:</b>	Snoddons/Killultagh	
<b>Project:</b>	Lands at Blaris, Lisburn	
<b>File Ref:</b>	SNOB0006	
<b>Meeting Date:</b>	09 July 2008	
<b>Venue:</b>	Planning Service HQ	
<b>Present:</b>	<p>Sam Harris</p> <p>Richard Steenson</p> <p>Clyde Shanks</p> <p>Justine Daly</p> <p>Gavin Rolston</p> <p>Kevin McShane</p> <p>John Cummins</p> <p>Damien Mulligan</p> <p>Freddie Cafolla</p> <p>Hillary McIlroy</p> <p>Ian Wilson</p> <p>Robin Totten</p> <p>Henry Irwin</p> <p>Bill Allen</p> <p>Tom Swindles</p> <p>Charlie Moore</p> <p>Noel McVicker</p> <p>Bernard Clarke</p> <p>Beth Pope</p> <p>Kyle Alexander</p> <p>Graeme Cardwell</p>	<p>Snoddons</p> <p>Killultagh</p> <p>TA</p> <p>TA</p> <p>TA</p> <p>RPS</p> <p>Planning Service; Strategic Projects Team</p> <p>Planning Service; Strategic Projects Team</p> <p>Planning Service; Strategic Projects Team</p> <p>Planning Service, BMAP Team</p> <p>Lisburn City Council</p> <p>Roads Service</p> <p>Landscape Architects Branch</p> <p>Rivers Agency</p> <p>NI Water</p> <p>NI Water</p> <p>NI Water</p> <p>Translink</p> <p>South Eastern Education and Library Board</p> <p>Strategic Investment Board</p> <p>Invest NI</p>
<b>Circulation:</b>	TA file, client, RPS, DOE	

Notes	Action
<p>1. DM commenced the meeting by introducing all parties and explaining the background to the site and the proposed development framework, including the recently withdrawn application and the position agreed through the BMAP Public Inquiry. DM then passed across to TA for the presentation.</p>	
<p>2. CS began by explaining that the original application had been withdrawn on the agreement with Planning Service that this would allow a clear path for the development framework process to commence. CS provided an overview of the site and the wider context of Lisburn and the Maze, and the agreement reached through BMAP in terms of the mix of uses and the reduction in size of the LLPA.</p>	
<p>3. CS provided an overview of the Concept Masterplan that accompanied the original application, which had analysed and considered the whole site, rather than just those lands within the application. CS suggested that the development of the site would allow for the possibility of an orbital route around Lisburn. In terms of townscape, these details would come forward as part of the development framework process and O'Mahoney Pike Architects have been commissioned to work on this, in conjunction with TA.</p>	
<p>4. JD then explained how the principles of the original CMP have been extended into the area outside the application site in greater detail. JD identified how a series of character areas had been identified, each with different design parameters which will be considered as part of the design guidelines and in turn inform the development framework in an iterative manner.</p>	
<p>5. In terms of working arrangements going forward, CS envisaged the next meeting to be a site visit and workshop during August 2008, with feedback and meetings focused on particular areas after this. The development framework will then guide applications, which will start coming forward early next year.</p>	
<p>6. After the presentation was finished, DM opened the floor for questions, starting with Roads Service.</p>	
<p><b>Transportation</b></p>	
<p>7. RT was generally content with what was proposed, but queried what information would be included within the development framework. KMCS advised that a full TIA had been submitted for the original application and that this would be extended to cover the whole site. A transport masterplan statement would also be prepared. The alignment of the link road as shown is consistent with what was agreed through BMAP and there will be no direct access from individual dwellings</p>	



to the link road.

8. CS indicated that simple visuals would be prepared to identify the relationships between roads, footpaths and cycle routes, as had been done for LD1.
9. BC queried how many houses would be delivered by the scheme. CS believed it would be a minimum of 2500, over a development period of some 25 years, based on c.75 hectares of housing land and the Department's standard density of 25 dwellings per hectare.
10. For that scale of development BC felt that more than just town services would be needed. BC did not think that Blaris was on the road to any other important destination and therefore more difficult to incorporate into existing bus network. Over time the development of the site would require major changes to the transport network.
11. BC was also concerned about the future of the Sprucefield Park and Ride site. This has been a great success for Translink and they do not want it to be lost. SH advised that they had been in discussions with Roads Service and the Park and Ride could be retained, although not at its existing location.
12. DM queried whether the increase in size of the site compared to the outline application would have a major traffic impact. KMCS felt that the best approach would be to have a transportation framework for the whole site, to sit in parallel with the development framework.
13. IW requested that the proposed rapid transport scheme for Lisburn should be considered to connect to Blaris and also the Maze. The impact of the A1 – M1 bypass should also be taken into consideration.
14. KA emphasised the importance of the Knockmore Link Road and the upgrading of Blaris Road for future development at the Maze site. KA explained that in the future there should be more transparency which will hopefully enable them to work together since there are mutual interests across the Blaris and Maze sites.
15. BC raised the issue of the proposed rail halt in west Lisburn. This was an initiative taken through BMAP at a site off the Knockmore Road, however, its development for such has now been compromised. Translink have a second site, but it has not progressed to date. BC requested that Planning Service take into account the need for a rail halt in west Lisburn.
16. RPS will arrange to meet with Roads Service and Translink to agree way forward.

**BMAP**

17. HMCI advised that there had been broad agreement on a set of revised Key Site Requirements through the BMAP Public Inquiry process. However, these are still the subject of the PAC report, along with that part of the site outside the existing settlement limit.
18. DM confirmed that the development framework will not address any issues that are controversial in terms of BMAP. CS stressed that the settlement limits were agreed at the Inquiry and that the early applications will be BMAP compliant. DM agreed with this approach and advised that the early applications would come through the PADs procedure and all issues could be ironed out at that stage.

**Water/Sewage Infrastructure**

19. NMcV advised that there is an existing trunk watermain along Blaris Road and through the site up to Knockmore Road. There are also sewer mains traversing the site from Culcavey. Any necessary diversions should follow main roads. NMcV queried what the water/foul sewage demands will be. NMcV assumed that storm discharge will be to Lagan under consent from Rivers Agency. Concerned that site is relatively flat – would like to see as few pumping stations as possible due to cost implications. If a pumping station is required within the site this needs to be taken account of in the development framework.
20. NI Water would need direct consultation with development consortium to discuss infrastructure charges.
21. TS advised that the only major Waste Water Treatment Works in Lisburn is New Holland. This means that the sewage will have to be pumped across Lisburn as the proposed Maze WWTW is unlikely to happen in the short to medium term. There are several WWTWs near Blaris, but these are small and at capacity. A more strategic view of these issues needs to be taken.
22. KA confirmed that a site has been allocated at the Maze for a WWTW to serve west Lisburn. TS believed that if Blaris was constructed to pump sewage to New Holland that changing to use the WWTW at the Maze at a later date would not be cost effective.
23. IW highlighted the fact that other large areas of land, in south, north and west Lisburn had been agreed for development through the BMAP process. These areas need to be taken account of in any upgrade of New Holland or new WWTW at the Maze.
24. KMcS queried if proposals for the WWTW at the Maze were advancing,

irrespective of wider development of site. TS advised that NI Water were not working on proposals for the Maze site at present as there is an issue with the OFMDFM.

### **Rivers**

25. BA agreed with the approach of using SUDS on the site. BA queried whether or not this would be the approach across the whole site. JD advised that this really depended on the detail going forward but it was intended to be used as much as possible.
26. BA would require a Flood Risk Assessment to be carried out for the site. While the floodplain mapping provided to date is generally correct, more detail is required, particularly in respect of Lagan tributaries. Consultation with RA would also be necessary where roads are proposed to cross rivers/floodplains.

RPS to address

### **Industrial Development**

27. GC believed that INI would have a limited input to the development framework. The wider employment base would have to be considered. INI endorsed the range and size of parcels of land proposed for industry in the draft development framework. However, sites need to be available within 18 months to be promoted by INI.
28. CS advised that the developers were aiming for a modern business campus, using the Edinburgh Park development on the M8 Ring Road near Edinburgh Airport as a potential template.
29. IW queried how the RDS five year review will affect the Blaris site. CS was aware that the site had not been affected by the previous review of the RDS and that the current review was unlikely to alter the position. SH believed there was still an opportunity to submit representations to the RDS review.

### **Education**

30. BP was aware that a primary school site had been identified as part of the original application. However, no post-primary provision had been incorporated. SEELB would require additional lands for primary provision as quantum of housing is doubling. The new school will require playing fields – this can be incorporated with LCC requirements.
31. CS advised that at the BMAP Inquiry, no post-primary provision had been agreed. Furthermore, no list of education requirements had been incorporated as part of KSRs for site and that the revised LC07 policy dealt with this in very broad terms.

CS accepted that the pupils for the primary school would be generated by the proposed housing. However, secondary school pupils would be a general draw from the wider south west Lisburn Area and it would therefore be unfair for the developer to carry this burden.

32. BP accepted this but the secondary school would have to be built somewhere and that Blaris provides an opportunity with the necessary infrastructure/access. Possibility of existing secondary school within Lisburn being relocated to Blaris site to allow for expansion. CS felt that more clarity on this issue would be needed, particularly what would happen to existing secondary school site if school moved.

TA/Snoddons/SEELB  
to explore further

### Landscape

33. HI agreed that particular areas of the site would have to be looked at in greater detail to understand how relationships would work. In addition to those explained HI would need detail on interface between the M1 Motorway and the site, including views when approaching from either direction. JD confirmed that this would be looked at.

TA

### Next Steps

34. JC advised that Blaris was at a more advanced position at this stage and that what was most important was to agree what could be agreed within the development framework, agree which issues needed further clarification and to agree what cannot be agreed until the adoption of BMAP.

TA/PS

35. In terms of next steps, DM requested that TA take forward the issues raised on a one-to-one basis with the relevant bodies, including Roads Service, Translink, SEELB and LAB. DM felt that the next full meeting should be in two months time to allow for meaningful engagement and progression of issues.

TA

36. JC agreed to talk to Tom Clarke and understand the agreed position. JC did not believe that a meeting on site would be necessary at this stage.

37. In terms of programme, JC wanted the development framework to be agreed first. Using TQ as the blueprint he considered the approach might include agreement on:

- Overall development framework;
- Overall strategic transport plan;
- Design Principles document

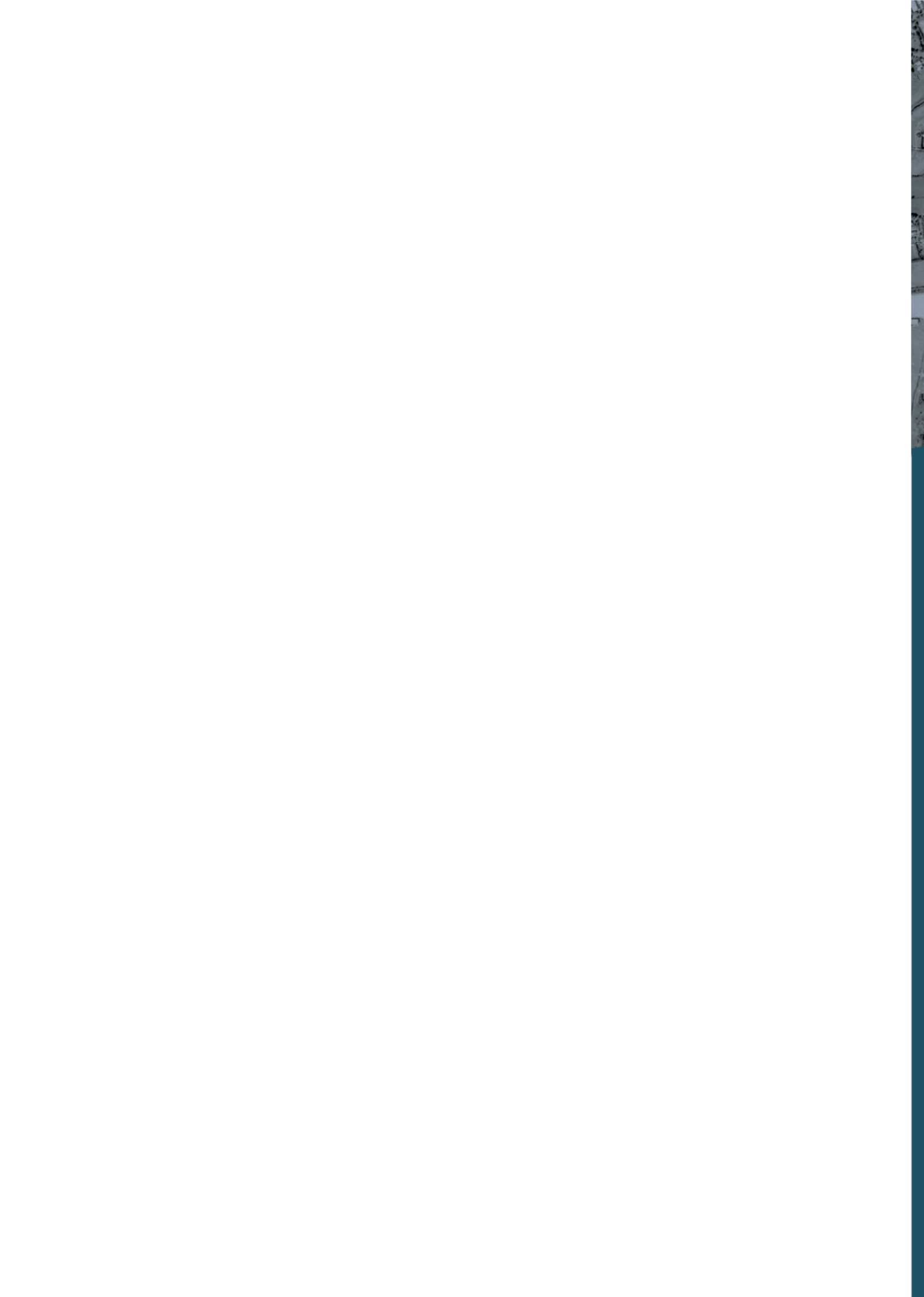
TA

38. TA to prepare first draft of development framework document, with a clear indication of the scale of development proposed. Vital to have general agreement

on overall development framework in order to bring forward detailed applications.

39. JC agreed to write to CS after reflection with a date for the next development framework meeting.

PS





## ANNEX 6



Mr C Shanks  
Turley Associates  
29 Montgomery Street  
BELFAST  
BT1 4NX

Millennium House  
17-25 Great Victoria Street  
Belfast  
BT2 7BN

Tele: 028 90 256533

Date: 27 April 2010

Dear Clyde

#### **DEVELOPMENT FRAMEWORK FOR LANDS AT BLARIS, LISBURN**

I am writing to confirm that the Department considers that the Development Framework (dated October 2009) and the associated Transport Masterplan (dated March 2010) provide an acceptable basis for the future development of these lands.

As was previously explained the Department participated in the process of agreeing the content of the Development Framework and Transport Masterplan on a without prejudice basis. This is due to the fact that the submission and determination of a planning application is necessary to obtain the formal decision of the Department.

You will be aware that the issue of development on these lands was a matter considered at the BMAP public inquiry and will be addressed by the PAC in their report.

The issue of 'prematurity' in relation to the BMAP plan process is a matter that will need to be considered in the event of any formal planning application being submitted prior to the receipt by the Department of the PAC report on the BMAP

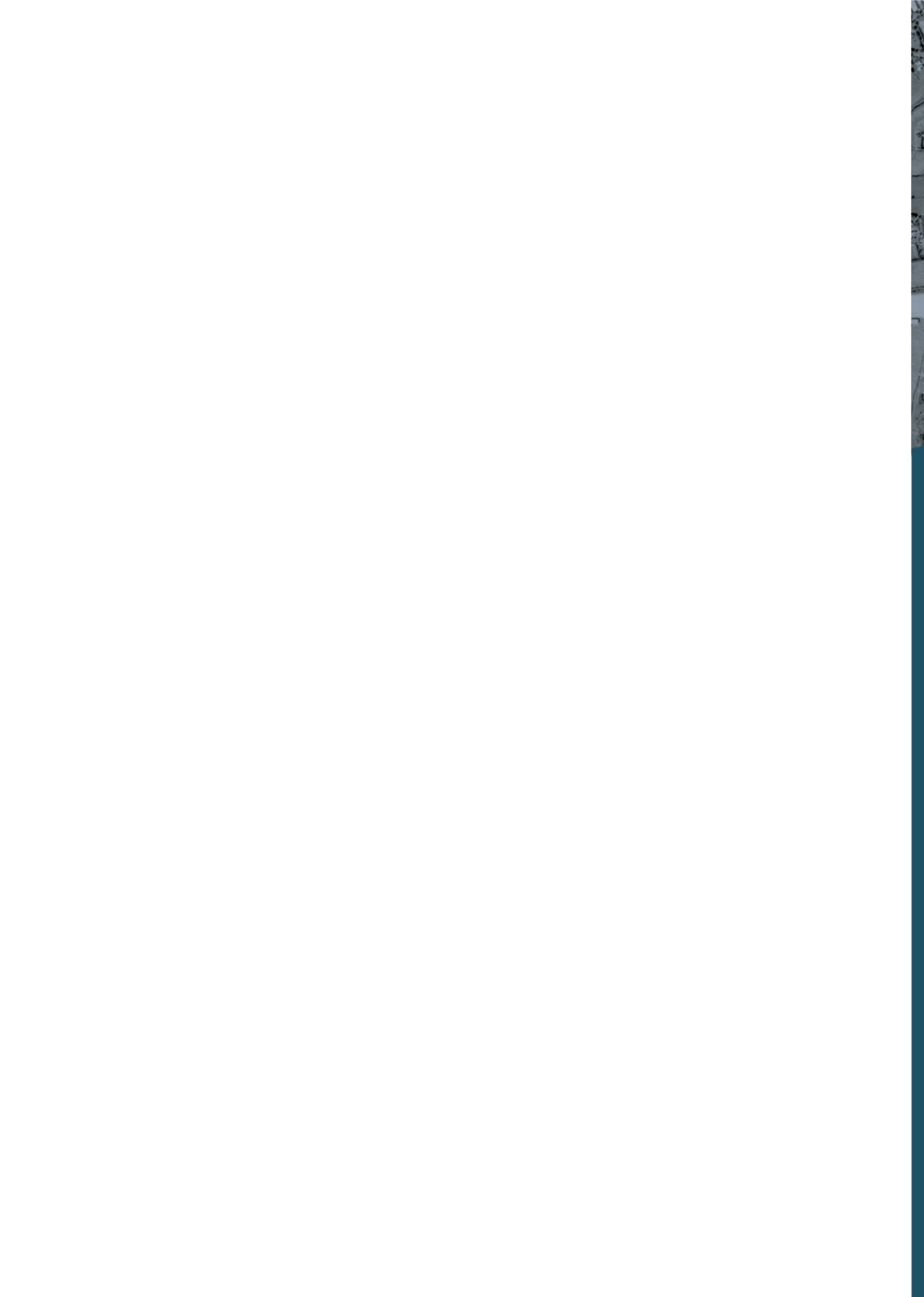


inquiry. At present the Department expects to receive the PAC report on BMAP by the summer of 2010.

Yours sincerely

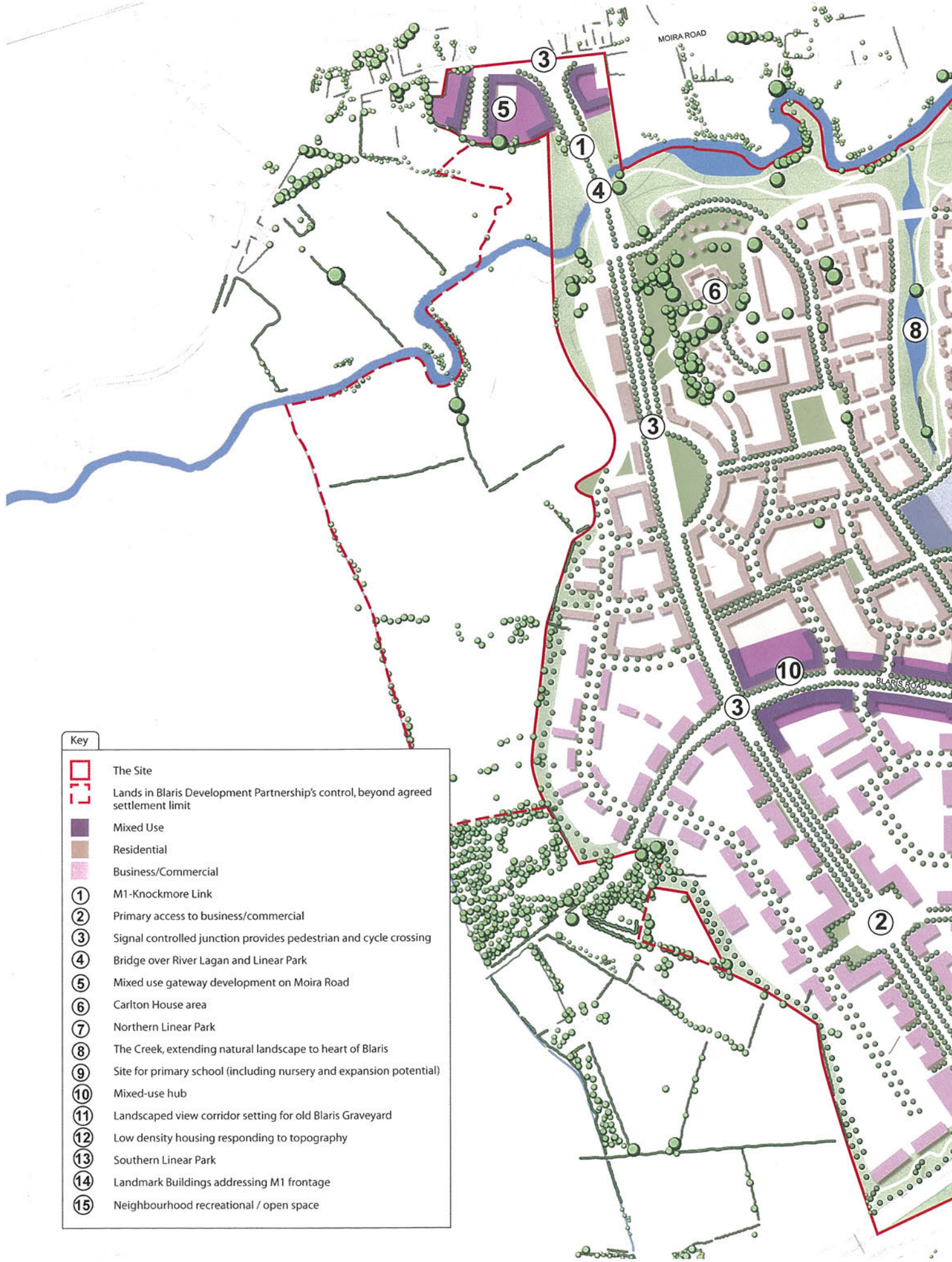


**TJ CLARKE**  
Director of Strategic Planning





## ANNEX 7

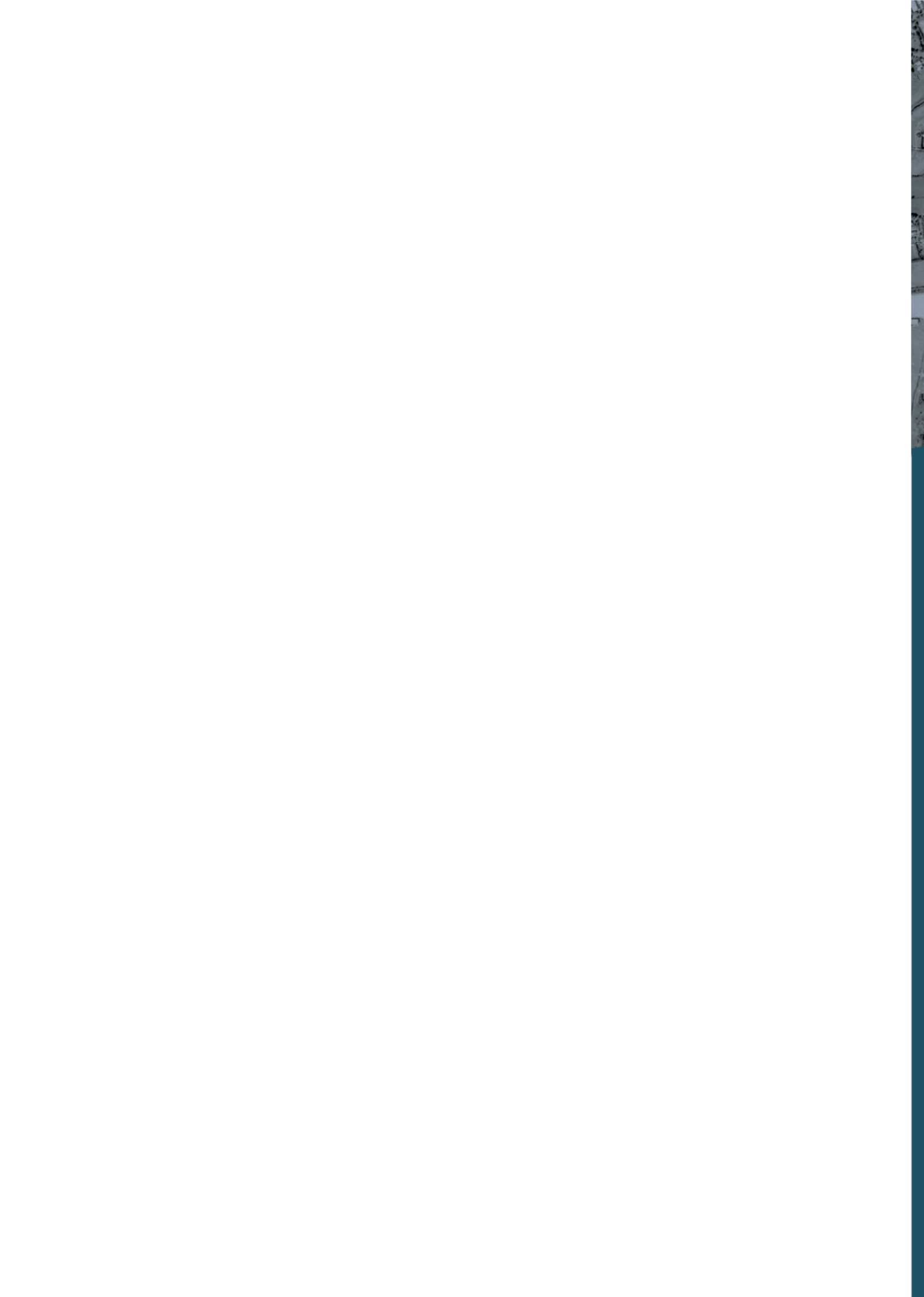


Key	
	The Site
	Lands in Blaris Development Partnership's control, beyond agreed settlement limit
	Mixed Use
	Residential
	Business/Commercial
	M1-Knockmore Link
	Primary access to business/commercial
	Signal controlled junction provides pedestrian and cycle crossing
	Bridge over River Lagan and Linear Park
	Mixed use gateway development on Moira Road
	Carlton House area
	Northern Linear Park
	The Creek, extending natural landscape to heart of Blaris
	Site for primary school (including nursery and expansion potential)
	Mixed-use hub
	Landscaped view corridor setting for old Blaris Graveyard
	Low density housing responding to topography
	Southern Linear Park
	Landmark Buildings addressing M1 frontage
	Neighbourhood recreational / open space

Overall design concept plan

# BLARIS FINAL DEVELOPMENT FRAMEWORK - OCTOBER







## ANNEX 8

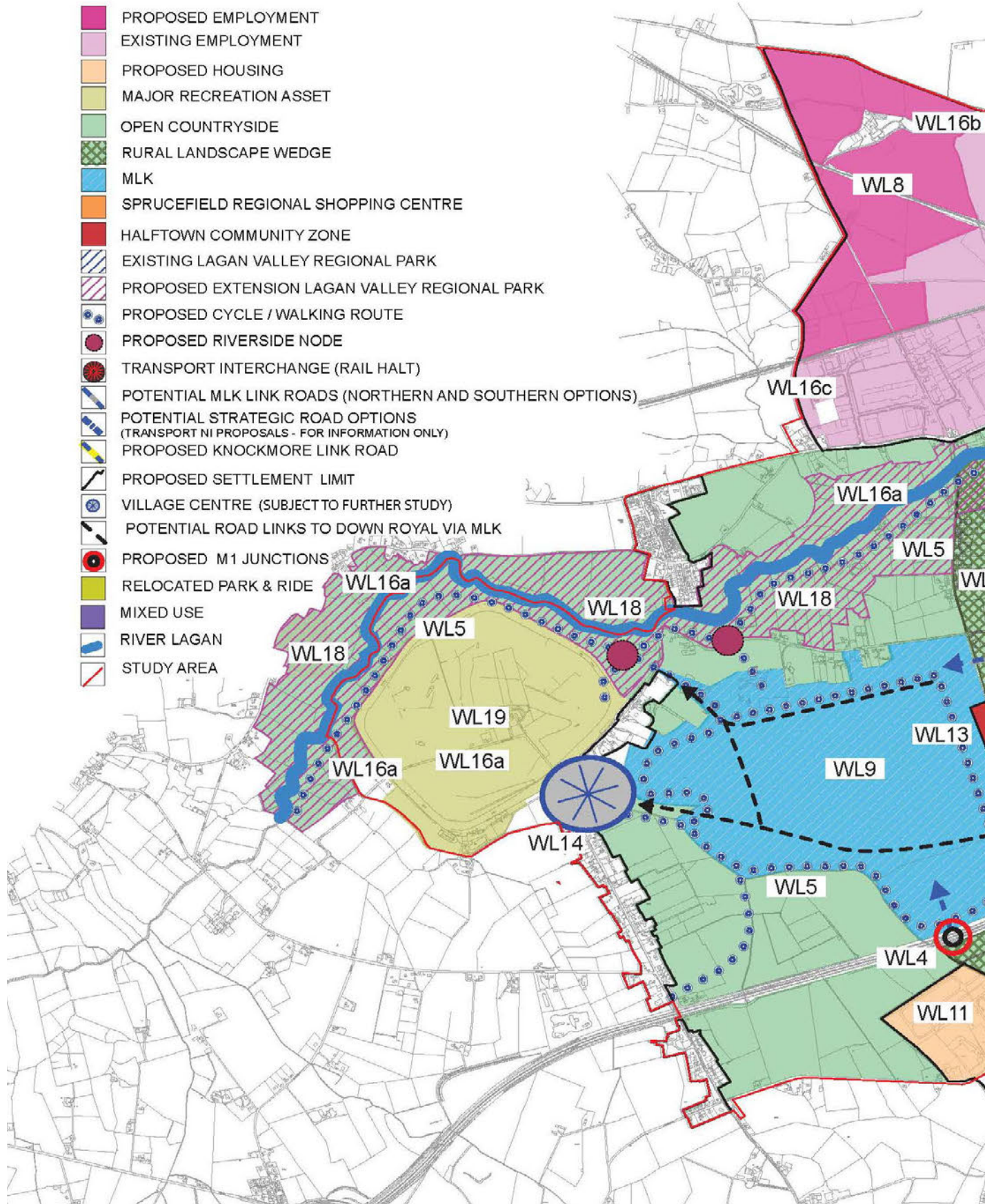
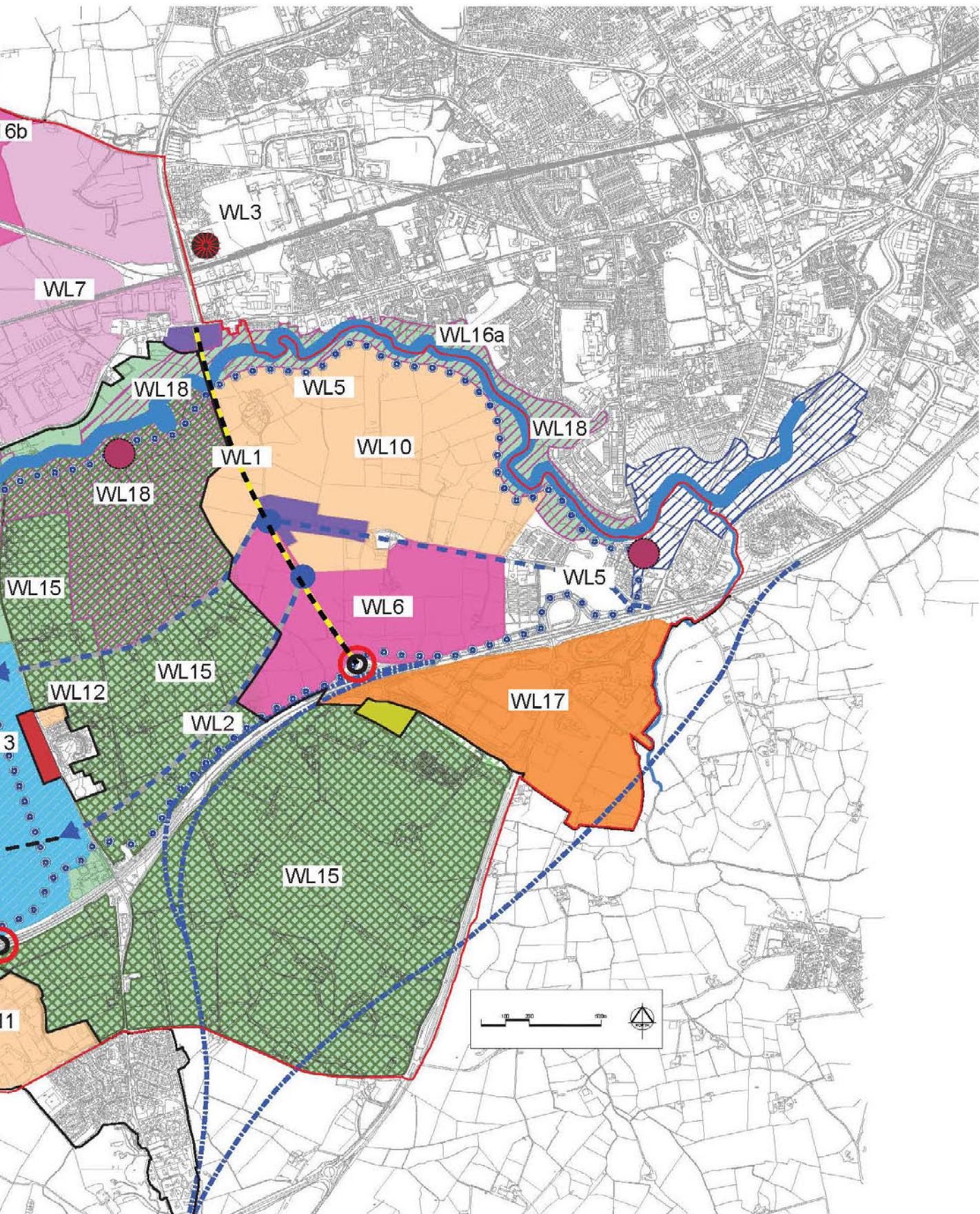
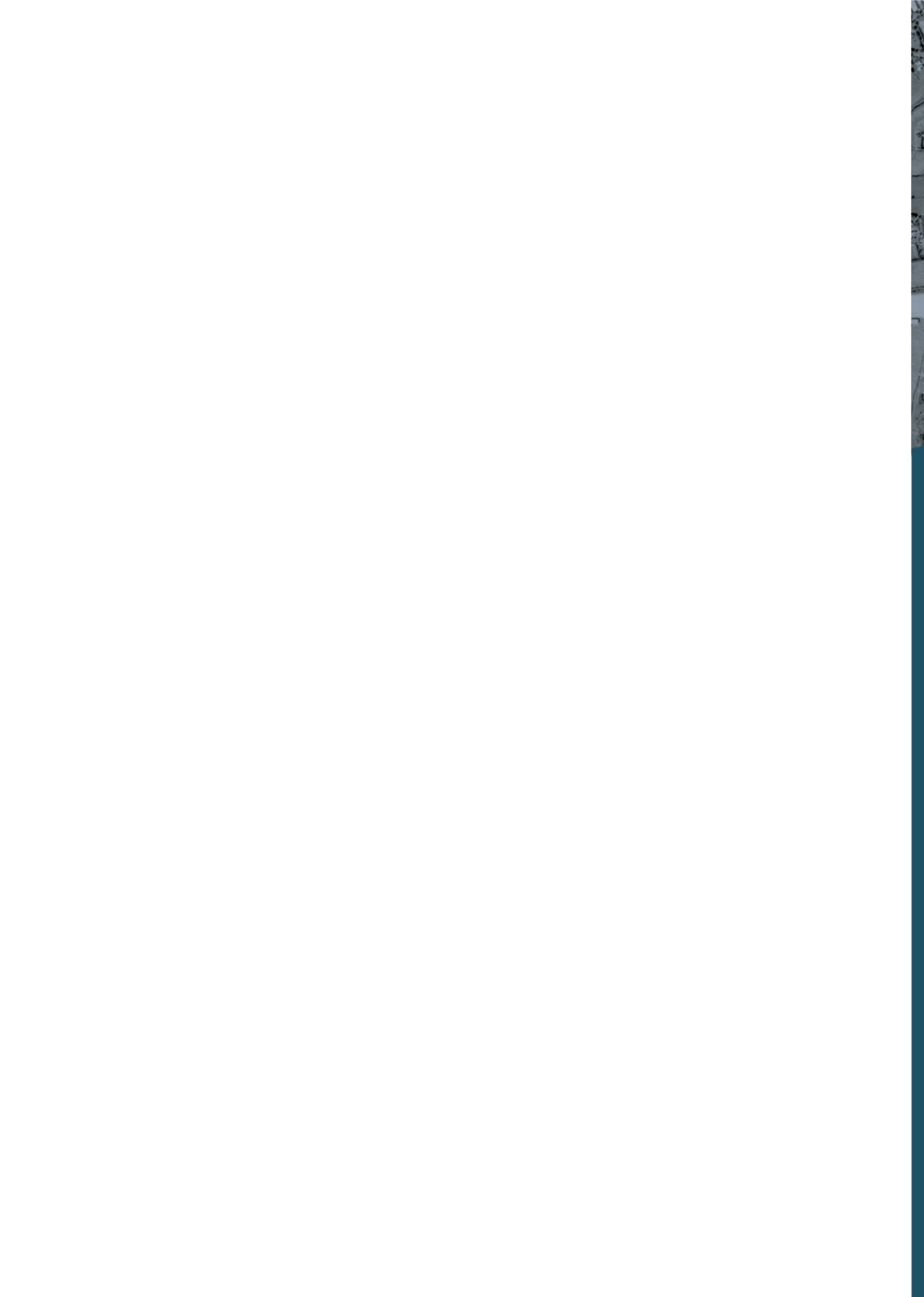


Figure 6 – Zo









## ANNEX 9

**PLANNING APPEALS COMMISSION**  
**The Planning (Northern Ireland) Order 1991**

**Article 7**

**PUBLIC LOCAL INQUIRY INTO OBJECTIONS TO THE  
BELFAST METROPOLITAN AREA PLAN 2015**

**PART 2**

**REPORT ON LISBURN CITY COUNCIL AREA**

**by**

**Commissioners E Kinghan, A McCooey, A Speirs & M Jones**

**Inquiry Dates: 16<sup>th</sup> April 2007 – 1<sup>st</sup> May 2008**

**Date of Report: 8<sup>th</sup> July 2011**

## **EMPLOYMENT ZONINGS**

### **ZONING LC 07 – MAJOR EMPLOYMENT LOCATION – LANDS AT WEST LISBURN, BLARIS ROAD**

**{Also Designation LC 21 – LLPA Knockmore and Proposal LC 37 – Open Space West Lisburn}**

(Objections 73, 450, 588, 702/7, 733, 762, 768, 772, 932, 1856/11, 2022/10-13, 3117, 3824/14)

There is a clear focus in the RDS on accommodating new housing and employment uses to serve the BMA. The guidance for the BMA clearly identifies areas for planned lateral expansion on the key transport corridors at Lisburn (Spatial Development Strategy for the BMA p. 50). BMA 2.1 lists West Lisburn/Sprucefield as one of the strategic locations for employment growth. Lisburn is identified as having high growth potential and the scope to accommodate significant housing expansion reflecting its strategic location at the meeting point of key transport corridors and also refers to the promotion of Lisburn's continued development as a strong employment base (BMA 1.2 – Lisburn 1<sup>st</sup> bullet point, page 70).

We must firstly consider the use of the zoning as this may affect our deliberations on the principle of development. Objection 932 also related to the inclusion additional lands to the west of the Zoning within the settlement limit. The Department assessed those lands at an early stage and considered them suitable for residential development. It recommended that they be allocated for housing development to meet the "three-year flexibility" for housing land. This seems to have set the template for the re-consideration of the overall zoning. The Departmental statement of case refers to the importance of the site for employment use and that the majority of the zoning should be retained for that use. At the Inquiry this stance changed and the Department agreed with the objectors that the zoning should be for mixed use, comprising equal proportions of employment and residential development. The objectors were obviously content with that approach. They had argued that there was a live planning application that reflected this mix of uses. Interestingly, the objectors' Proposals Plan for the site indicates that the additional lands outside the settlement limit were proposed for employment use as part of a Strategic Investment Park.

We have concluded in Part 1 of our report that it is necessary and appropriate to provide an ample supply of employment land in the interests of facilitating economic development flexibility and choice. We were also conscious of the importance of employment land to economic development and the extent to which this issue underpins the rationale of the Plan. We have noted the wider range of business uses that are acceptable on employment sites than were considered suitable for the old fashioned industrial estates. The importance of the location for the employment strategy of the BMA and Northern Ireland is stated in the RDS. The developers and the Department also referred to the strategic significance of this particular location for employment. We consider that the site is one of two crucial zonings of new employment land on the periphery of the Metropolitan Area. It is a designated Major Employment Location in the Plan. This is a key site in a highly accessible location at the junction of the M1 and A1, close to the railway line. The proposed M1 – Knockmore Link will provide direct access to the strategic highway network. These prime locations providing optimum employment land are rare, in contrast to the wider range of available housing land. The scale of the site is important for accommodating potential employment uses requiring an

extensive land take. An example of this is the recently completed Coca-Cola plant at Lissue, which occupies a very large site. Given this context we are surprised that the Department changed its view on the zoning and agreed to the effective reduction of the site by accepting residential development on half of the (albeit enlarged) site. We consider that no convincing evidence was presented to justify this departure from the Plan's key provisions. The Department did not justify why its opinion changed in respect of the requirement for employment land in this strategic location.

We consider that the site is a prime location for employment use to meet the employment needs of the BMA and the strategic directions of the RDS. We have addressed the point that the objectors made regarding the strategic directions for housing growth in the RDS in part 1 of our report. We concluded that the RDS refers to Lisburn City generally as the location for growth and not just West Lisburn and certainly not the Blaris area; even the use of the term west Lisburn could relate to a wide area to the west of the city. On the other hand, the RDS does specifically refer to the Sprucefield/ West Lisburn area as a strategic location for employment growth. We have considered objections seeking additional housing lands and recommended that some of these sites are included to meet the STLR. The objectors' argument that this is the only realistic option for expansion of Lisburn is therefore entirely misplaced. We consider that this area is far from ideal for housing purposes in view of its relatively isolated location from other housing and the fact that it is surrounded by major employment uses, retail development and roads infrastructure. The RDS does refer to mixed use developments but this is primarily related to inner urban locations or ensuring that urban extensions provide more balanced communities. There is no reference to adopting this approach in west Lisburn. There was another argument that there may be benefits in terms of housing development contributing to the funding of the M1-Knockmore link road. We recognise the importance of this road for development in the whole of west Lisburn. However, we note that many of the existing housing zonings in the Plan have key site requirements relating to a contribution to the link road. We consider that employment zonings should also contribute equally to this road, as they are major traffic generators and would benefit equally from the road. We conclude that no part of this zoning or any additional lands around the zoning should be allocated for housing in the Plan because of the importance of the zoning for employment as outlined above. We have considered the most northerly portion of the site to the west of the M1 – Knockmore Link road separately as part of our assessment of the objection sites south of Lissue Industrial Estate. This land is outside the zoning.

We must now consider the issue of the additional lands suggested by objection 932 for inclusion as employment lands within the settlement limit. As we consider that the original zoning in the Plan should be retained for employment use there would appear to be no justification or need for more employment land, especially given the Department's final position on the zoning. We will consider revisions to the LLPA and open space zonings within the development limit later in this section. The outcome of these deliberations may increase the size of the employment zoning but within the settlement limit proposed in the Plan. We consider that the proposed road represents a clear and logical definition for the settlement limit at this location. We do not agree that there need necessarily be development on both sides of this new road.

Objections 762 and 772 related to specific parts of the site and simply objected to those sites being zoned for employment uses. There was no rationale or explanation for the basis of these objections provided. We cannot therefore assess them further.

Objection 73 contained a large part of the existing zoning and some of the additional lands above as discussed in the previous paragraph. A part of these lands was already within the settlement limit and we have considered the part of this site that overlaps with objection 932 above. This leaves a portion of the site to the west of objection site 932 to be considered. As we consider that the lands to the east should not be included, it follows that we also consider that this site should not be included for either employment or residential use. This land is within the identified floodplain and the proposed LLPA LC21. The objection does not refer to the LLPA at all and there is no other objection to this part of the LLPA. We also consider that it would be contrary to PPS15 to zone land within the floodplain for development and therefore consider that it should remain outside the settlement limit.

Objection 450 sought the removal of the zoning of the site for any development because of the presence of the top quality classification of Best and Most Versatile Land on the site. This is the top 5% of land in Northern Ireland and is obviously a finite resource. The fact that the site contains land of this quality was not disputed by the Department or counter-objectors.

The objectors referred us to SPG-ENV 1 and the last bullet point under ENV 1.1 – protect the best and most versatile agricultural land as an important and finite regional resource as far as practicable. We note the use of the term as far as practicable and the fact that there are competing policy imperatives within the RDS itself. The RDS is an over-arching strategic planning framework and does not contain operational policy statements. There was formerly a clear policy imperative to protect such land contained in Policy AG1 of “A Planning Strategy for Rural Northern Ireland”. The policy provisions of PPS21 Sustainable Development in the Countryside take precedence over Policy AG 1. There is no policy regarding agricultural land quality in PPS21. This distinguishes the situation now from the policy context at the time of the Commission's consideration of the 1983 Lisburn Area Plan, where the Commission recommended exclusion of this site on the basis of agricultural land quality. Further operational policies are necessary to give effect to the strategic guidelines in the RDS. In this case, there are no operational policies related to the protection of the best and most versatile agricultural land.

We were presented with no evidence as to the quantum of BMV agricultural land within the site or what percentage of the Northern Ireland total would be lost to development. In the absence of this information we have no context in which to judge the significance of the loss of this site or parts of the site containing BMV land. We consider that the clear policy direction and over-arching strategic guidelines for the development of the BMA are focussed on expansion at Lisburn. The constraints of the Belfast Hills, Areas of High Scenic Value and Lagan Valley Regional Park mean that the opportunities for significant expansion are confined to south and west Lisburn. This location is well-served by transport and is at the meeting point of key transport corridors including the main Dublin-Belfast road and rail lines. We have already concluded that this is a prime location for economic development and employment opportunities, as per SPG-ECON 2 (ECON 2.1). Our conclusion is that the strategic directions of the RDS outweigh the agricultural land quality issues. We consider that this is a case where it is not practicable to protect the high quality agricultural land. The statements in relation to sustainability and prudent use of natural resources have to be balanced against the need to provide for the future development needs of the BMA, which is a key function of the RDS and this Plan.

A great deal was made of the timing of the Department of Agriculture and Rural Development's consultation reply. Nevertheless there is no objection from that Department to the zoning. We do not agree with it that agricultural land quality is no longer an issue simply because Policy AG1 has been superseded. We have considered this issue above.

The Maze site (LN09) has been identified as a strategic land reserve of regional importance. This role has been reinforced by references to the site incorporated into the RDS by the adjustments published in June 2008. In this context, it would not be appropriate to consider the Maze site as an alternative to the LC 07 zoning. The Department and objectors (including the agent for this objection) accepted that there was a need for additional employment land in west Lisburn and some additional land at Lissue has been recommended for inclusion within the development limit for employment uses. It should be noted that a significant proportion of this site has been developed (Coca-Cola plant). The other major employment zoning in the area – LC 09 has been substantially developed since the technical supplement was prepared. This dilutes the objectors' arguments regarding there being little need for additional employment land still further. We note the objectors' long history of family involvement in the area, but consider that this is not a factor that we can take into account in the zoning of land in a development plan context. We were not presented with any evidence of an over-riding nature conservation interest on the site. There are no nature conservation designations in the Plan and the Department did not suggest any such designations on the site. The open landscape along the River Lagan is to be protected by zonings as open space and as a LLPA.

We cannot sustain this objection to the principle of development of the site and recommend no change to the Plan as a result of the objection.

#### **Office development (objections 932 and 2022)**

The objectors initially argued that office uses within Class B1 (a) should be allowed on the site with no restrictions. At the inquiry this stance was changed to request that up to 9,290 m<sup>2</sup> of floorspace should be allowed with Departmental authorisation required for anything beyond that figure. The basis for this figure was a planning permission that had been granted for that amount of floorspace at Sprucefield in 2001. This planning permission was not implemented and has now lapsed. We do not consider that this floorspace can be used as a figure for Blaris because of the time that has elapsed and the differing policy context applicable in Sprucefield as a regional centre. This policy context was obviously a factor in the approval of business uses in association with the retail development that has since been constructed (Sainsbury's, etc.) The status of this planning permission in terms of its partial implementation by the construction of the retail units is not a matter for us to determine. The Department considered that the figure of 5000 m<sup>2</sup> as used at Titanic Quarter was more appropriate in order to protect Belfast and Lisburn city centres. We acknowledge the evidence that was provided regarding the need for speed in attracting inward investment and the development of business parks at key accessible locations around other cities in the UK and Ireland. We also acknowledge the expert advice of letting agents supported by Invest NI. However, as we stated in our consideration of the issue in relation to Titanic Quarter, we consider that the exceptional clause operated satisfactorily there and should do so in this case also. If it can be shown that there is a need for larger offices and that they cannot be accommodated in city centre locations then the case can be made for them to be allowed on this site.



**LLPA (Designation LC 21) and Open Space (Designation LC 37) Issues  
(objections 588, 733, 768, 932, 1856, 2022 and 3117)**

At the Inquiry there was significant agreement between the objectors, Department and Lisburn City Council on the precise delineation of the LLPA as it affects the zoning. The only remaining difference appeared to be regarding the open space designation. The Department and objectors considered that it was unnecessary because the LLPA would protect the area and key site requirements could address the provision of a riverside park, which the Council desired. Lisburn City Council requested that the LLPA also be zoned as open space. We do not accept the argument that an open space designation would impose severe restrictions under PPS8. The areas in question are within the floodplain and development would not be permissible under PPS15. Should the LLPA become a riverside park then it would be de facto open space anyway and PPS8 would apply. The LLPA will be defined within Zoning LC 07 and we see no reason why it cannot also be designated as open space and recommend accordingly. We agree that the LC 07 designation should include the requirement to provide the riverside park as suggested by the objectors and Department.

There was reference to a pinch point at the northern end of the zoning near a bend of the river. Lisburn City Council were concerned that there would not be sufficient room to provide the riverside park, footpaths and cycleways. There does not appear to be any physical features defining the Department/objectors agreed boundary. The landform consists of a gentle slope up from the river. The Department preferred the Council's suggestion at the inquiry. The site is large enough to ensure that there is sufficient space between development and the river to provide the necessary leisure facilities. We consider that the Council's suggested boundary should be followed for this small portion of the northern boundary. Apart from this change we endorse the agreed LLPA boundary as it affects LC 07. We note that boundary now includes all of Carlton House and outbuildings in the LLPA.

There was another issue that Lagan Valley Regional Park should be extended to include this area of open space. This issue is addressed in the Lagan Valley Regional Park volume of our report.

Objection 588 did not refer to the designation of part of their site as open space and an LLPA. Objection 768 overlaps with 588 and did object to the designation of that site as open space and LLPA. We consider that the LLPA and open space designations are justified as amended above. The importance of the Lagan Valley needs to be recognised in this area. The agreed amendment to the LLPA and open space means that part of the site will be included in Zoning LC 07 and can be developed. The remainder of the site is partly within the floodplain and is important to the setting of Lisburn in terms of the River Lagan. We have no further information to assess the objection and whether it is satisfied. The site is within the development limit and outside Lagan Valley Regional Park and therefore the objection on these grounds is without any basis.

Objections 733 and 3117 sought the reduction of the open space designations as it affected their lands. The designations have been reduced and so we consider that they have been at least partly if not fully addressed.

Objection 1856 (RSPB) sought the extension of the open space designation to include the lands between the Blaris Cemetery extension and the River Lagan. These lands are within the LLPA and a SLNCI already. They appear to be within the floodplain and are not being used for agricultural purposes. We consider that this portion of land could be zoned as open space by extension of the adjoining LC 37 open space zoning.

### **Plan Text and Key Site Requirements (objections 702, 932 and 2022)**

We generally prefer the Department's suggested headnote for the zoning. It will require adjustments in the light of our conclusions on the objections. We consider that it is important to refer to the fact that it is a major employment location. The objectors' suggested text read more like explanatory text and does not accord with our recommendation in any event. The area of the site was identified as 105 hectares in the Plan. The adjustments to the open space and LLPA zonings will increase the size of Zoning LC 07. The Department should re-calculate the area of the zoning and this should be the figure used in the headnote. We suggest that Map No. 2/002 may no longer be necessary because it illustrated development zones no longer proposed.

We agree that a planning (and transport) masterplan for the site is required in view of its size and the range of proposed employment uses. We note that School and Healthcare facilities were included in the key site requirements in the Plan and consider that their provision can be addressed in this Masterplan. The list of acceptable employment uses is as standard for an employment zoning. Office use has been discussed above and we agree with the Department's approach. We note that the other suggested uses (Hotel and Car Showrooms) were also included in the key site requirements in the Plan. Transport Assessment is a requirement of regional policy and does not need to be included as a key site requirement. The provision of the M1-Knockmore link is essential to this development and must be provided as part of the development. The specification of other matters would pre-judge the outcome of the assessment process.

The matter of access to Blaris Road can be addressed in the Masterplan. The provision of cycle and pedestrian links and public transport can also be addressed in the Masterplan and Transport Assessment. We note that the Council requested that a pedestrian and cycle link should be provided from Blaris old cemetery to the River Lagan. There seemed to be broad agreement and an indication that it could be facilitated within the proposed layout. We agree with the parties that a linear park should be provided along the river with links to and through the development. The link to Blaris old cemetery could be facilitated as part of this requirement. We consider that this would be a superior route than along the M1-Knockmore link, as suggested by Sustrans (objection 702). The linear park will include cycleways, which will satisfy one of Sustrans other routes along the Lagan. We do not have sufficient information to address their suggested route along the M1. Somewhat confusingly Lisburn City Council objected to the community greenways in this area in a different submission made by a different agent. We shall address this objection under community greenways below in the context of what we have recommended here.

We have explained our general approach to key site requirements above. The Masterplan will address landscaping matters. Lisburn City Council's amendments to the key site requirements are over-prescriptive and unnecessary. Provision of the linear park and pedestrian and cycle links are covered already and open space is addressed in the Masterplan.

There was broad agreement with the Department's amplification text. We agree that the references to multi-landowners and to consultation with the Departments of Education and Health are not necessary. The Department may wish to consider reference to the requirements of regional policy in order to assist developers.

### **Recommendations**

We recommend that the text in the plan should read as follows:

#### **Major Employment Location Land at West Lisburn, Blaris**

**[X] hectares of land are zoned for employment use at West Lisburn, Blaris as identified on Map 2/001 – Lisburn City**

Key site requirements:

- Development of the site shall only be permitted in accordance with an overall Masterplan (incorporating a transport masterplan) to be agreed with the Department.
- The Masterplan shall outline:
  1. the overall design concept, objectives and priorities for the site
  2. a block structure defined by a hierarchy of routes and spaces
  3. appropriate scale, massing and design variety of building blocks
  4. appropriate open space and public realm
  5. appropriate landscaping including boundary planting and around Blaris old cemetery
  6. appropriate public transport, cycleway, footpath and parking provision
  7. the proposed phasing of development
- the following uses will be acceptable on the site: employment uses in Use Classes B1, B2, B3 and B4; Hotel and ancillary leisure facilities; School; Healthcare facilities (Use Class D1 (a); Car Showrooms; open space; small scale retail development to serve local needs. The above Use Classes are as defined in the Planning (Use Classes) Order (Northern Ireland) 2004.
- The total amount of floorspace for Business Use Class B1 (a) (Offices) within the overall Zoning shall not exceed 5,000 m<sup>2</sup>. Consideration may be given to proposals above 5,000 m<sup>2</sup> where it can be demonstrated that the proposal cannot be accommodated within Belfast or Lisburn city centres and would otherwise result in the loss of significant inward investment.
- The provision of the M1-Knockmore link road. The funding of this road shall be the responsibility of the developers either in full or very substantial part.
- A linear riverside park shall be provided within the area that comprises LLPA LC 21 to include pedestrian and cycle corridors which integrate with the proposed development, Blaris Old Cemetery and the wider River Lagan corridor.

We also recommend that the amplification be amended as discussed above.

**Recommendations for LLPA and Open Space – Zonings LC 21 and LC 37**

We recommend that the LLPA Zoning LC 21 be defined as discussed above and that this area also be designated as open space under Zoning LC 37. We also recommend that Zoning LC 37 include the area of LLPA LC 21 between Blaris Cemetery extension and the River Lagan.

**Zoning LC 09 – Lands at Knockmore Road****Objections 1469 & 1568**

These objections were to the impact of industrial development on the setting of Lissue House and the fact that the LLPA (LC 23) would be ineffectual in offering protection to the wider setting of the House. Lissue House is a listed building and the House and its setting are afforded statutory protection by Planning Legislation. We note that the lands are already zoned for industrial development in the Lisburn Area Plan and are zoned as Existing Employment in the Plan. We also note that the key site requirements for the zoning include the provision of a 5-10m wide planting buffer along the boundary with Lissue House. This is the same as the requirement for all other boundaries. In fact it appears to be a case of repetition of the same requirement twice. As Lissue House is raised above Zoning LC 09, development will impact on its setting. We consider that this impact could be reduced by more robust key site requirements. The Masterplan and landscaping plans should address the relationship with Lissue House and provide for a minimum buffer to protect the setting of the listed building. The zoning has been partially developed and we are not aware of the approval of any Masterplans already. We note that the more westerly field of the zoning nearest Lissue House remains undeveloped. In this context we consider that the key site requirements should be amended to reflect our conclusions above. We do not support the deletion of the zoning as may be suggested by the objector. We cannot support the extension of an LLPA onto an adjoining field without landscape merit. This would be contrary to the guidance on designation of LLPAs in PPS6.

**Objection 895** related to the key site requirements for the zoning. In particular, the need for a concept masterplan was queried. We have made it clear that a concept plan is necessary in the context of the adjoining listed building and the zoning's peripheral location. This may cause difficulties for piecemeal development of the site, but proper planning must take priority. The objection also specified the requirements for a transport assessment and Article 40 for management of the landscaping. Transport assessment is a requirement of regional policy and so this key site requirement is not necessary. Management of landscaping can be addressed by conditions and so this requirement is not necessary. The objection referred to all the key site requirements and so we shall comment briefly on the others. The list of acceptable use classes needs to be amended to reflect the Department's strategic position and the current Use Classes Order. Variety of buildings can be addressed in the concept plan and at the application stage. As stated above we consider that a comprehensive landscaping plan should be submitted at the same time as the Masterplan. This can address planting to boundaries and the retention of vegetation within the site. There is less need for prescriptive landscaping requirements to be specified. For example, the southern boundary of the zoning is defined by an old railway line and the land beyond is also now also proposed for employment uses.



## ANNEX 10



Figure 6.11 - Non-Strategic Highway Network Schemes

