

**Lisburn and Castlereagh City
Council LDP 2032
Housing and Employment
Topic Paper**

Lisburn and Castlereagh City Council

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1.0 Introduction

- 1.1 In pursuance of the Local Development Plan (LDP) Regulations 2015, Lisburn and Castlereagh City Council (LCCC) published its draft Plan Strategy for consultation in November 2019. This was informed by a wide-ranging evidence base, including a Housing Growth Study and Employment Land Review, which were both prepared by Lichfields in 2019. The purpose of these studies was to identify the need for, and supply of, housing and employment across Lisburn and Castlereagh over the Plan period (2017 to 2032).
- 1.2 The consultation process ended in January 2020 and LCCC officers have subsequently reviewed the representations that were received. Pending the publication of Focused Changes for consultation, Lichfields has been instructed to prepare a Housing and Employment Topic Paper. The purpose of this is to:
- 1 Review and respond to representations that have been made in respect of the housing and employment strategic policies (SP8 and SP11);
 - 2 Update the Housing Growth Study and Employment Land Review with the latest available data; and,
 - 3 Advise on any consequential changes that should be made to the draft Plan Strategy.
- 1.3 This Topic Paper should be read alongside LCCC's schedule of Focused Changes. It is structured as follows:
- 1 Section 2 considers the need for housing in Lisburn and Castlereagh over the full Plan period and the residual need between 2019 and 2032.
 - 2 Section 3 addresses a number of matters relating to the future housing supply, including the components of supply, LCCC's approach to the application of a non-implementation discount to each component, the phasing of supply, assessment of sites against the Housing Evaluation Framework, and affordable housing.
 - 3 Section 4 specifically addresses the strategic allocation at West Lisburn/Blaris.
 - 4 Section 5 contains an assessment of the employment sites that were not included in the Employment Land Review and explains LCCC's approach to the future use of unzoned employment sites.
 - 5 Section 6 considers the impact of Covid-19 on future housing and economic growth in Lisburn and Castlereagh.
- 1.4 Please note that whilst all representations were analysed as part of the Council's consideration, a number of specific references are made in this report to individual representations by way of example.

2.0 Housing Need

- 2.1 This section addresses the issues associated with the housing need figure contained in the draft Plan Strategy. Strategic Policy SPO8 identifies a baseline future growth figure of 692dpa over the Plan period from 2017 to 2032. This has been rounded to 700dpa and equates to 10,500 dwellings over the 15-year period.
- 2.2 This housing requirement figure was based on the Housing Growth Study (HGS) which was prepared by Lichfields (dated September 2019) and published with the draft Plan Strategy. Whilst the HGS drew on the latest 2016-based NISRA population and household projections, it was prepared prior to the publication of the latest (2016-based) Housing Growth Indicators (HGIs). It sought to update the HGI, taking account of the 2016-based house projections but retaining the adjustments for second homes, vacant stock and conversions, closures and demolitions, as identified in the HGI 2012 methodology note.
- 2.3 Using the PopGroup suite of software, the HGS considered a number of alternative scenarios. The housing requirement figures arising from each scenario is set out below:

Table 2.1 Summary of scenarios tested by the HGS

Scenario	Household change 2017-32	Dwelling requirement 2017-32)
A: 2016-baseline	8,720 (581pa)	9,100 (605dpa)
B: Updated HGI	-	10,380 (692dpa)
C: OE baseline (307 jobs pa)	6,230 (451pa)	6,490 (433dpa)
D: Jobs-led long term past trends (651 jobs pa)	10,345 (690pa)	10,775 (718dpa)
E: Jobs-led short term past trends (442 jobs pa)	8,602 (573pa)	8,960 (597dpa)

Source: LCCC Housing Growth Study

- 2.4 The HGS recommended that the amended HGI figure of 692dpa represented a robust housing requirement for the emerging LDP period to 2032.

Updated HGIs

- 2.5 The Department for Infrastructure published the revised HGIs in September 2019. These covered the period from 2016 to 2030 and identified a total need of 10,700 for Lisburn and Castlereagh (713dpa) over this 15-year period¹.
- 2.6 The period covered by the latest HGIs do not coincide with the period of the emerging LDP (2017-2032). It has therefore been necessary to update the published HGIs to take account of the projected number of households in 2032 and the housing stock in 2017. In adjusting the figures for second homes and vacant stock, we have retained the same proportionate share of expected dwellings at the end of the period as per the latest HGIs:
- 1 Second homes: HGIs anticipate 400 second homes in 2030; this equates to 0.59% of the total number of dwellings in 2030 (2030 household plus second homes plus vacant dwellings = 67,400).
 - 2 Vacant dwellings: HGIs anticipate 3,700 vacant homes in 2030; this equates to 5.5% of the total number of dwellings in 2030 (2030 household plus second homes plus vacant dwellings = 67,400).

¹ The Department for Infrastructure has confirmed that the HGIs relate to the period from 1 January 2016 to 31 December 2030 – a full 15 years.

- 2.7 As detailed in Table 2.2, the implication of this adjustment is a requirement for 10,845 dwellings over the LDP Period from 2017 to 2032, equivalent to 723dpa.
- 2.8 This slightly higher figure than the official HGI requirement of 10,700 dwellings can be understood by reference to the following:
- 1 A difference of 946 in the dwelling stock figure for the first year for which data is available (2016: 58,000; 2017: 58,946).
 - 2 A difference of 1,091 in the dwelling stock estimate for at the end of the assessment period (2030: 68,700; 2032: 69,791), based on:
 - a A difference of 1,008 in the household projection for the final year of assessment (2030: 63,500; 2032: 64,508); and,
 - b A difference of 83 in the total adjustment applied for second homes and vacant stock.
- 2.9 Resulting in a difference of 145 in the projected dwelling requirement over the study period (10dpa).
- 2.10 It should also be noted that the 2016 HGI figures are rounded to the nearest 100 and so some further differences might have arisen as a result of this.

Table 2.2 Adjustment to 2016-based HGI to reflect LCCC LDP period

	1	2	3	4	5	6	7
	No h'holds at end of period	2 nd homes	Vacant stock	Conversions etc	New stock est at end of period	Housing stock at start of period	New dwg req
2016-30	63,500	400	3,700	1,100	68,700	58,000	10,700 (713dpa)
Source/ Calculation	2016-based NISRA h'hold projections	See above		73.3 per annum	1 + 2 + 3 + 4	LPS NI Housing Stock publication	5 – 6
2017-32	64,508	405	3,778	1,100	69,791	58,946	10,845 (723dpa)

Source: 2016-based HGIs / Lichfields analysis

Updates to other scenarios

- 2.11 The PopGroup analysis that informed the alternative scenarios in the HGS has also been updated to reflect the latest data in respect of the conversion from households to dwellings. The results of this analysis are set out below in respect of Scenarios D and E:

Table 2.3 Updated employment-led dwelling requirement

Scenario	PopGroup output		Net dwelling requirement (2017-32)
	Household change (2017-32)	Gross dwelling requirement (2017-32)	
D: Jobs-led long term past trends (651 jobs pa)	10,345 (690pa)	11,016 (734dpa)	12,116 (808dpa)
E: Jobs-led short term past trends (442 jobs pa)	8,602 (573pa)	9,160 (610dpa)	10,260 (684dpa)

Source: Lichfields analysis

- 2.12 These are gross figures and so do not align with the HGI figure which take account of net conversions, closures and demolitions. Adding an allowance of 73dpa (1,100 over the Plan period) to the figures above result in a net figure of 684dpa for the short-term scenario and 808dpa for the long-term scenario. The mid-point between these figures (746dpa) is very closely aligned with the revised HGI figure (a difference of 3.2%). The mid-point between the two past trend job figures is 547 per annum. This is closely aligned with the average level of employment growth between 1997 and 2017 (554 jobs per annum).
- 2.13 It is important to ensure that a shortage of future housing delivery does not act as a constraint to economic growth. To this end, the alignment of housing and employment growth will play a significant role in contributing to balanced growth and balanced communities. We therefore recommend that the figure of 746dpa (rounded to 750dpa) should represent the housing requirement for LCCC which equates to a requirement of 11, 250 units over the Plan period².

Past trends

- 2.14 A number of representations that were submitted in response to the draft Plan Strategy have suggested that:
- “the Council’s approach to housing growth projections is based on too short a review period. A suggested alternative approach that is considered appropriate is to base the overall housing growth figure on a longer period of growth, from 1998 to 2013, which includes both pre and post-recession build out rates...”*
- 2.15 These representations suggest use of the same past-trend period, despite this not being supported by evidence or reflecting the most up-to-date information. The source of the past trend data from 1998 is not known.
- 2.16 Past trends cannot be relied on as a robust indicator of future housing need. This is because there is no assurance that the level of historic housing completions was consistent with need or that future needs will be the same as those experienced in the past. There is a risk that such an approach could reward past under-delivery by lowering future requirements. Nevertheless, a review of past trends can be a useful means by which to undertake a sense check of the requirement figures derived from other sources in terms of their consistency with past trends or

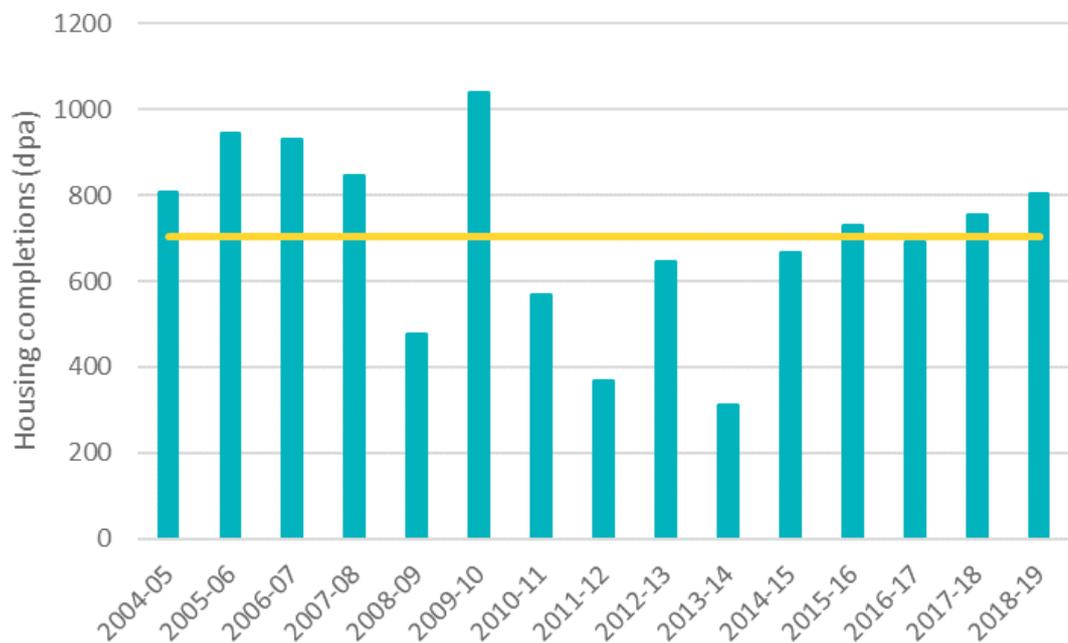
² See paragraphs 2.20 -2.27 regarding application of 10% flexibility margin

the extent to which a step-change in delivery would be necessary to meet identified requirement levels.

2.17 A review of data provided by LCCC relating to new dwelling completions for the 15-year period between 2004/5 and 2018/19 shows an average completion rate of 705dpa. Against this figure, the identified housing requirement of 746dpa would necessitate a small increase of 5.8%.

2.18 This analysis reflects the latest data that is available from LCCC and incorporates a number of years before and after the recession. We consider it to be preferable to any evidence relating to an arbitrary period from 1998 to 2013.

Figure 2.1 Housing completions in Lisburn and Castlereagh, 2004/5-2018/19



Source: LCCC

Adjustments to baseline housing requirement

2.19 Having recommended a baseline housing requirement figure of 692dpa, the HGS stated at paragraphs 9.2 and 9.3:

“It is appropriate to consider whether the actual housing need going forward is higher than the minimum figure identified by the household projections.

“In order to identify the appropriate level of future housing growth in the emerging Local Development Plan, LCCC should give consideration to whether an upward adjustment is required...”

Flexibility margin

2.20 In response to this, the draft Plan Strategy states at page 58 that:

“There is a requirement for the Council to ensure that the identified HGI figure can be met. A buffer of 10% over-supply has been applied to the HGI baseline figure which takes into consideration the possibility that an element of the identified potential might not come forward during the plan period.”

- 2.21 A number of representations were received in respect of this flexibility margin, including:
- 1 Department for Infrastructure (DPS-109) “*in principle supports an approach that provides for a level of additional flexibility to account for non-delivery and other unforeseen issues.*” (page 6).
 - 2 Gravis Planning on behalf of Hilmark Homes (DPS-076): accepts 10% flexibility margin, although suggests that it should be applied to a higher base figure (see below)
 - 3 An Agent (DPS-083): “*A further 10% addition is therefore appropriate, robust and conservative ... to ensure that the Council area plays its role in meeting demand...*” (paragraph 4.17).
 - 4 TSA on behalf of Rosemount Homes (DPS-068): accepts 10% flexibility margin, but consider that it should be applied to a different base figure.
- 2.22 The inclusion of a flexibility margin is an important planning tool that will ensure that the housing requirement can be met even in the event that some sites do not come forward at the expected rate. This will protect the Council against proposals for development on sites that do not accord with the Plan strategy and will ensure that its vision for growth can be achieved.
- 2.23 Although other Local Government Districts in Northern Ireland are not currently proposing any such flexibility margin, this approach is widely used elsewhere in the UK. Most notably, Scottish Planning Policy (2014) requires the inclusion of a flexibility margin within housing policies contained in all development plans. Paragraph 116 states:
- “Within the overall housing supply target, plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan.”*
- 2.24 In Wales, the Local Development Plan Manual (2020) also requires the inclusion of a flexibility margin. Paragraph 5.59 states:
- “It will be extremely rare that all sites identified in a plan will come forward in the timescale anticipated. Whilst there is a need to improve certainty through frontloading, as described earlier in the Manual, there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites. A development plan will not be effective if it cannot accommodate changing circumstances. **This means that a flexibility allowance must be embedded into the plan.** The plan will need to evidence there is sufficient flexibility above the requirement to account for non-delivery and unforeseen issues ... The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced. The policy framework in the plan should be clear regarding the housing requirement, provision, and flexibility allowance. The level of flexibility chosen by the LPA when the plan goes on deposit is broadly maintained upon adoption of the plan.”* (emphasis as per Development Plans Manual).
- 2.25 We also identified the following sample of local authorities in England and Wales that have included a flexibility margin. Whilst not seeking to provide a comprehensive overview of the housing policies contained within all English and Welsh development plans, it does demonstrate how this approach has been widely used by local authorities.

Table 2.4 Review of flexibility margin applied by local authorities in England and Wales

Local authority area	Housing requirement	Housing provision	Uplift	Margin
Babergh	5,975	6,570	595	10.0%
Bolton	8,670	10,410	1,740	20.0%
Blaenau Gwent	3,500	3,907	407	11.6%
Caerphilly	8,625	10,269	1,644	19.0%
Calderdale (at examination)	4,200	5,040	840	20.0%
Cardiff	41,415	45,415	4,000	9.6%
Carlisle	9,606	11,460	1,854	19.3%
Conwy	6,520	7,170	650	10.0%
Cotswold	8,400	9,614	1,214	14.5%
Cheltenham, Gloucester and Tewkesbury (Joint Core Strategy)	33,500	35,175	1,675	5.0%
Chichester	6,879	7,282	403	5.9%
Guildford	10,678	14,602	3,924	36.7%
Havant	6,300	6,974	674	10.7%
Kirklees	31,140	32,739	1599	5.1%
Melton	6,125	7,316	1191	19.4%
Merthyr Tydfil	2,250	2,821	571	25.4%
Milton Keynes	26,500	28,182	1682	6.3%
Monmouthshire	4,500	4,950	450	10.0%
Neath Port Talbot	7,800	8,760	960	12.3%
Newport	10,350	11,623	1,273	12.3%
Pembrokeshire	5,700	7,300	1,600	28.1%
Powys	4,500	5,588	1,088	24.2%
Swansea	15,600	17,645	2,045	13.1%
Torfaen	4,700	5,740	1,040	22.1%
Vale of Glamorgan	9,460	10,408	948	10.0%

Source: Lichfields analysis

2.26 The average margin applied in these 25 development plan examples is 12.0%.

2.27 This evidence demonstrates the extent to which a flexibility margin represents a valuable and widely used tool that contributes towards the effective planning for future housing development in order to ensure that identified needs can be met. It will similarly play an important role in ensuring that the identified housing requirement for Lisburn and Castlereagh can be delivered over the LDP period. It will also ensure that the Plan will be sufficiently flexible to respond to changing circumstances that may occur over time, as required by the Test of Soundness CE4 (coherence and effectiveness test).

Allowance for continuous five-year supply

2.28 Some of the representations submitted argue that an extra allowance should be made to address “*predicted growth over the plan period plus a five-year supply*” prior to the application of a 10% flexibility margin.

2.29 Given that the baseline housing requirement figure has been calculated over a 15-year period, this equates to a total uplift of 46.6%³:

- 1 An additional 33.3% to allow for the extra five-year supply, such that the requirement effectively relates to 20 years rather than the 15-year Plan period⁴; and,
- 2 A further 10% uplift to the 20-year requirement (which equates to an extra 13.33% margin on the baseline figure)⁵.

2.30 Such an approach is flawed. It is based on the requirement of the SPPS for a five-year supply of land for housing to be maintained. However, this is in place to ensure that sites can come forward at an appropriate rate in order to meet the identified housing requirement. The policy can only be met through the identification of deliverable sites. It cannot be achieved by increasing the requirement to set out a 20-year target for a 15-year Plan period.

2.31 The LDP should set out a housing requirement for the Plan period to which it relates (i.e. to 2032). It should not seek to incorporate a requirement for an additional five years beyond that point (i.e. to 2037).

Further allowances

2.32 Some representations have called for a number of further upward adjustments, as follows:

- 1 An additional 2,400 dwellings to reflect the requirement for social housing; and,
- 2 An additional 2,400 dwellings as proposed at West Lisburn.

2.33 As to each of these allowances:

- 1 The identified housing requirement relates to all tenures of housing and so no further adjustment should be applied to this figure. The separate affordable housing requirement that has been identified forms part of – and is not separate to – the wider housing requirement.
- 2 West Lisburn represents a strategic housing allocation that will contribute towards the identified housing *need*. No allowance should be added to the housing *requirement* figure to reflect the proposed development at West Lisburn.

2.34 Matters relating to affordable housing need and the strategic allocation at West Lisburn are considered separately (in Sections 3 and 4 respectively).

Housing need in neighbouring council areas

2.35 A number of representations submitted suggest that, in addition to ensuring that there will be no shortfall in supply, this flexibility margin should also account for the growth plans of neighbouring authorities. The Gravis Planning representation (DPS-076) points to the economic growth plans of Belfast and states that “*it is inevitable that this will have a knock-on effect, in terms of housing demand, on neighbouring Council areas that also contribute commuters to Belfast, such as Lisburn and Castlereagh.*” It goes on to recognise that Lisburn and Castlereagh borders a number of other authority areas and states that “*there will ultimately be a host of inter-relationships between these Council Areas, with people travelling across boundaries for work, for leisure etc. As such, Lisburn and Castlereagh housing growth projections should take cognisance of all of the plans of these neighbouring Councils.*”

³ Assuming a baseline requirement of 750dpa (11,250 over the 15-year Plan period), this would result in a total requirement of 16,500 dwellings.

⁴ Assuming a baseline requirement of 750dpa, this would be an uplift of 3,750 (11,250 + (750 x 5))

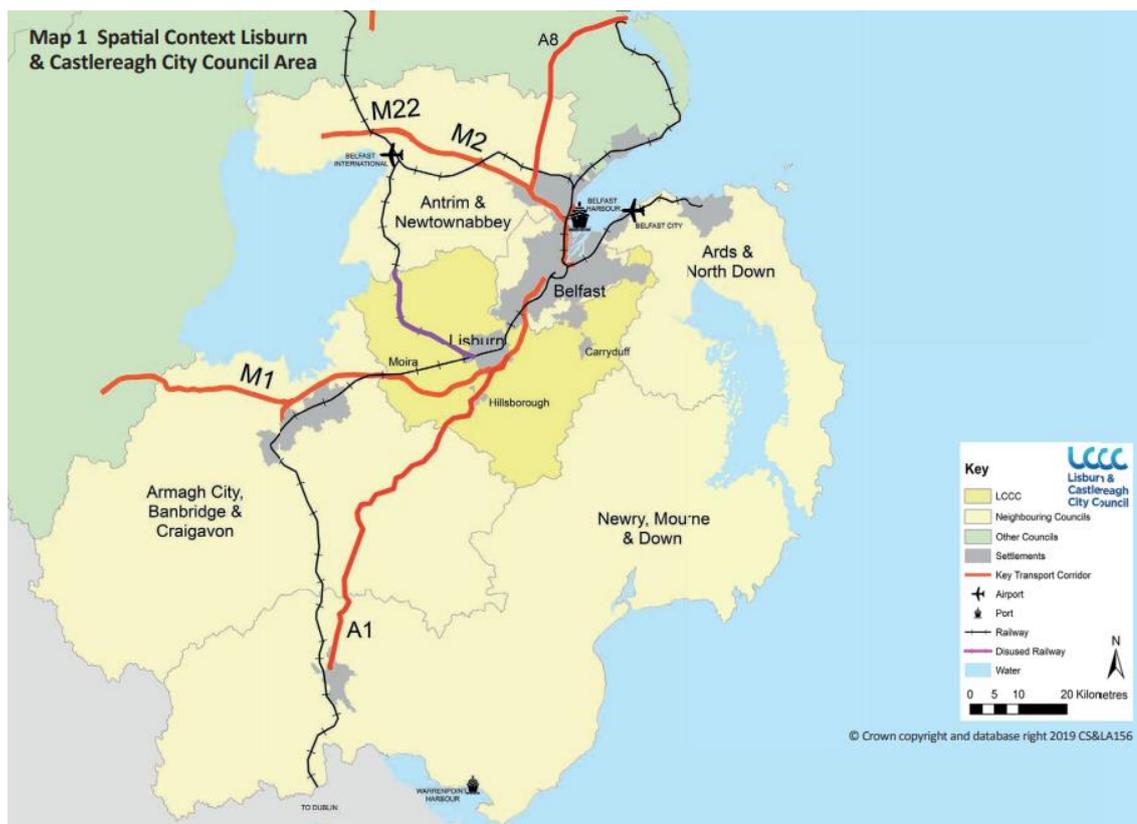
⁵ Assuming a baseline requirement of 750dpa, this would be a further uplift of 1,500 (15,000 + 10%)

2.36 As illustrated in Figure 2.2, Lisburn and Castlereagh is bordered by five other council areas. The extent to which it might be required to accommodate any unmet needs from adjoining council areas will depend on:

- 1 The position within the relevant authorities in respect of their housing needs and the ability to meet the identified requirement; and,
- 2 The status and timescales of any emerging LDP.

2.37 The position of the five adjoining council areas in respect of these matters is set out in Table 2.5.

Figure 2.2 Lisburn and Castlereagh in context of surrounding council areas



Source: Lisburn and Castlereagh LDP, page 15

Table 2.5 Status of emerging LDPs in adjoining Local Government Districts

Council area	LDP status	Plan period	Housing requirement	Plan Strategy to meet requirement
Belfast	Draft Plan Strategy submitted for Independent Examination. Initial hearings to take place November 2020	2020-2035	31,660 2020/21-24/25: 1,100-1,300dpa 2025-26-29/30: 2,100-2,300dpa 2030/31-2034/35: 2,700-2,900dpa	Yes
Antrim and Newtownabbey	Consultation on draft Plan Strategy October-December 2019	2015-2030	9,750 (650dpa)	Yes

Council area	LDP status	Plan period	Housing requirement	Plan Strategy to meet requirement
Ards and North Down	Consultation on Preferred Option Paper May-August 2019. Publication of draft Plan Strategy anticipated 2021/22.	2015-2030	Pro-rated HGI: 8,190 (546dpa)	Yes: capacity for 8,047 on existing zoned sites
Armagh City, Banbridge and Craigavon	Consultation on Preferred Option Paper March-May 2018.	2015-2030	Projection based on 2012 HGI, pro-rated to Plan period: 19,850 (1,323dpa)	Yes
Newry, Mourne and Down	Consultation on Preferred Option Paper June-August 2018.	2012-2030	11,258-17,496 (625-972dpa)	Yes: available housing land and current planning policy has capacity to delivery 18,065 dwellings over Plan period.

Source: Lichfield analysis of individual LDP documents

- 2.38 This analysis shows that the Belfast LDP is the only Plan Strategy that is at a more advanced stage of preparation than the Lisburn and Castlereagh LDP. The Antrim and Newtownabbey Plan Strategy is at a similar stage of preparation whilst the other plans are less well advanced. The stage of plan preparation will inevitably impact on ability of individual councils to consider:
- 1 Their housing requirement level;
 - 2 The sources of supply that will be required to meet that requirement;
 - 3 Whether there is likely to be any unmet need arising; and,
 - 4 How any such unmet need could be addressed.
- 2.39 Critically, both Belfast City and Antrim & Newtownabbey Councils have identified an adequate supply of housing to meet their identified requirements. Neither Council have identified any unmet needs, nor have they sought assistance from neighbouring councils to help meet their housing requirements.
- 2.40 Belfast City Council's *LDP Technical Supplement 2: Housing* specifically considers how to address the need for the identification of land for residential development beyond the urban footprint in a settlement. Referring to the Urban Capacity Study, it identifies two types of site that might be used if there is insufficient land to meet the Council's housing development needs:
- 1 Sites identified through a review of employment zoned land and existing housing zonings within which an increased density is feasible; and,
 - 2 Sites identified through a call for sites process.
- 2.41 In the event that these actions fail to identify an adequate supply of land, the Paper states that "other options could be explored, such as:"
- 1 Extending settlement limits – "the Urban Capacity Study noted sites on the Housing Monitor totalling more than 2,000 units located outside the existing urban footprint: in many cases these are committed, i.e. with extant approvals" (paragraph 4.18); and,
 - 2 Liaison with neighbouring authorities in Lisburn & Castlereagh and Antrim & Newtownabbey to enable zoned or unzoned lands in these jurisdictions to be used for housing to accommodate some of Belfast's growth.

- 2.42 Whilst Belfast City Council has identified cross-boundary collaboration as a potential solution to addressing any residual housing need, it is important to note that:
- 1 It is not known whether any residual need would exist;
 - 2 A number of other options are also set out in the Technical Paper and would be implemented in the first instance;
 - 3 No request has been made of Lisburn and Castlereagh Council to accommodate any of Belfast City's unmet housing need; and,
 - 4 The Technical Paper notes that "*the options above will be further explored at the Local Policies Plan stage*" (Paragraph 4.18) – i.e. not as part of the Plan Strategy. This means that the timing of any such consideration would mean that it could not inform the preparation of the Lisburn and Castlereagh LDP Plan Strategy.
- 2.43 The approach that has been taken by Belfast City and Antrim & Newtownabbey Councils in relation to their existing supply in respect of any identified need being met within neighbouring council areas, is therefore appropriate and is consistent with the policy contained in the SPPS.
- 2.44 An adjustment to take account of unmet housing need arising from adjoining authorities should not be made unilaterally. It should only follow a specific request from any authority that is unable to meet its housing need. No such request has been made. As a result, there is no need for Lisburn and Castlereagh Council to consider any adjustment to its housing requirement to address the needs of any of its neighbours.
- 2.45 In preparing its new LDP, each Council is required by the Planning Act 2011 to have regard to relevant plans, policies and strategies relating to adjoining councils and consider how these may affect their own plans. Where cross-boundary issues are relevant, it will be important to ascertain whether the LDP conflicts with the plans of neighbouring councils. Lisburn and Castlereagh Council has worked closely with all of its neighbours throughout the preparation of the LDP and also in respect of the preparation of neighbouring councils' LDPs.
- 2.46 The employment-led assessment of housing need takes account of commuting trends to adjoining authorities and therefore, the relationship between Lisburn and Castlereagh and the neighbouring Belfast City was taken into consideration in the modelling that produced the mid-point housing requirement figure of 746dpa. Similarly, the HGIs are based on past population and household trends and therefore would have been influenced by cross-boundary commuting and migration flows.
- 2.47 The Belfast draft Plan Strategy proposes a very significant level of employment and housing growth but asserts that this can be achieved within its administrative area. Rather than having an implication on Lisburn and Castlereagh in terms of necessitating an increase in the housing requirement to address any unmet needs, the representations submitted by Lisburn and Castlereagh Council to Belfast City Council expressed concern that the "*growth strategy raises a variety of cross-boundary issues relating to housing and employment growth that do not appear to have taken account of neighbouring councils and how that growth might affect or stifle them*" (page 7). The issue of whether Belfast can deliver its housing need in accordance with the level of growth proposed, remains an issue to be explored as part of the independent examination process.

Plan period

- 2.48 The Lisburn and Castlereagh LDP covers the 15-year period from 2017 to 2032. This accords with the requirements of paragraph 5.7 of the SPPS which requires LDPs to "*set out a long-term*

spatial strategy...” and paragraph 2.6 of Development Plan Practice Note 1 (DPPN1, April 2015) which requires LDPs to fulfil a number of functions. The first of these is that it should:

“Provide a 15-year plan framework to support the economic and social needs of a council’s district in line with regional strategies and policies, while providing for the delivery of sustainable development.”

2.49 There is no suggestion in this that the 15-year period commences upon adoption of the Plan.

2.50 We have reviewed the emerging LDPs for all Local Government Districts in Northern Ireland and note that none of these will cover a full 15-year period from adoption. Taking account of delays in the Plan preparation and slippage from the published LDP Timetables results in further reduction in the post-adoption Plan period – ranging from c.7.5 years to c.14.5 years.

Table 2.6 Anticipated post-adoption period of LDPs across Northern Ireland

Local Government District	Plan period To	LDP Timetable estimate of Plan Strategy adoption	Plan period (post-adoption)	Estimated slippage	Revised Plan Period (post-adoption)
Antrim and Newtownabbey	2030	Q4 2020/21	10 years	c.1 years	9 years
Ards and North Down	2032	Q4 2024/25	8 years	None	8 years
Armagh City, Banbridge and Craigavon	2030	Q4 2019/20 - Q1 2020/21	11 years	2.5+ years	c.8 years
Belfast	2035	Summer 2021	14.5 years	None	14.5 years
Causeway Coast and Glens	2035	Spring / Summer 2023	12.5 years	None	12.5 years
Derry City and Strabane	2032	Q3 2021/22	11 years	c.1 year	10 years
Fermanagh and Omagh	2030	Q2 2021/22	9.5 years	c.18 months	8 years
Mid and East Antrim	2030	Q1 2021	10 years	c. 1 year	9 years
Mid Ulster	2030	Winter 2020/21	10 years	c.2 years	8 years
Newry, Mourne and Down	2030	Q3 2022/23	8 years	c.6 months	7.5 years

Note: Plan period taken to end on 31 December of given year

Estimate of slippage is based on a review of the current stage of preparation against the most recently published timetable

Source: Lichfields analysis / LDP timescales prepared by individual councils

2.51 Based on the published timetable, the Lisburn and Castlereagh LDP Strategy is expected to be adopted between October 2021 and March 2022. Taking a mid-point of January 2022 would result in 11 years of the Plan period post adoption. Even allowing for a slight delay, it is reasonable to expect that there will be more than 10 years remaining in the Plan period on the day of adoption. This is a longer timescale than for many of the other LDPs.

2.52 The emerging LDP is the spatial reflection of the Council’s Community Plan, and the proposed LDP period specifically aligns with that of the Community Plan. This reflects the guidance set out in paragraph 2.8 of DPPN7 (April 2015):

“Part 10 of the Local Government Act 2014 amended Section 8 of the 2011 Act by introducing the additional statutory requirement that a council must take account of its current community plan in preparing its PS. This requirement only applies where a council has published its community plan under Section 68(4) of the 2014 Act. The PS may spatially reflect a council’s community plan and the two should work in tandem towards the same vision for a council area and its communities and set the long term social, economic and environmental objectives for its area.” (Emphasis added).

2.53 Against this very clear rationale for the proposed Plan period, it is noted that one representation (Turley: DPS-095) has indicated that the LDP period should be extended to 2035. The basis for this date is uncertain.

- 1 The representation points out that *“Belfast has taken a slightly longer-term view and established a plan period to 2035.”* However, there is no need to align the Plan period for the Lisburn and Castlereagh LDP with that of neighbouring authorities. It should be noted that the LDP Plan periods for other four Local Government Districts that border Lisburn and Castlereagh (and Belfast) extend to 2030.
- 2 It is suggested that a Plan period to 2035 would *“make it more likely that the final plan could clearly and distinctively move the statutory plan for the Borough beyond the ‘inherited’ strategies, limits and zonings of the legacy plans.”* Given that the Belfast Metropolitan Area Plan remains unadopted, the only ‘legacy’ plan is the Lisburn Area Plan, which covered the period to 2001. There can be no question about the emerging LDP that covers the period to 2032 being distinctive from the Lisburn Area Plan.
- 3 The representation states that a Plan period to 2035 would *“bring the plan into line”* with the SPPS in respect of the provision of a long-term strategy and DPPN01 reference to a 15-year framework. As set out above, the currently proposed Plan period satisfies both of these requirements.

2.54 The representation notes that paragraph 22 of the NPPF requires Local Plans in England to cover a period of 15 years from the date of adoption. Whilst that is true, it does not follow that this also applies in Northern Ireland. Rather, it serves only to highlight the differences in approach taken between the four UK countries:

- 1 In Scotland, development plans are required to cover a period of 10 years from the expected year of adoption;
- 2 In Wales, however, the requirement for a 15-year Plan period is not set out in any formal policy or guidance and neither is any requirement for a specific post-adoption period to be covered by the Plan; and,
- 3 In Northern Ireland, there is a requirement for LDPs to cover a 15-year period, but no specific requirement regarding the length of the post-adoption Plan period.

2.55 We also note that the suggested end date of 2035 would not provide a full 15-year period after the expected date of adoption. Instead, it would give a post-adoption Plan period of 12-13 years.

2.56 The proposed Plan period of 2017 to 2032 accords in full with the guidance set out by the Department for Infrastructure and therefore satisfies Soundness Test C3. It should be noted that Lisburn and Castlereagh Council will also comply with the requirements of Regulations 25(2) and 26 of the Planning (Local Development Plans) Regulations (Northern Ireland) 2015 in terms of:

- 1 The preparation of an annual monitoring report; and,

2 Carrying out a review of the LDP every five years from the date of adoption.

2.57 These two processes will ensure that any issues arising from the implementation of the Plan are identified and can be addressed through a review well in advance of the defined end date of the LDP in 2032. The updates to the LDP will extend the Plan period such that there will not be any gaps in coverage after that date. Rather, it will ensure continuity of Plan coverage and will ensure that there can continue to be a long term spatial strategy to guide future development across the Council area.

Conclusion

2.58 This analysis has identified an alignment between the 2016-based HGIs (as amended to reflect the LDP period), the updated employment-led scenarios, and past housing completions between 2005 and 2019. This alignment is important. It adds to the weight that can be placed on the recommended housing requirement figure and avoids undue reliance from being placed on any single source. The reliance on the multiple sources of data and modelling is also important given that HGIs are policy neutral indicators of what might happen if recent trends continue in the future.

2.59 Drawing on this updated analysis, we recommend that housing requirement for the LDP period should be increased to 11,250 (750dpa⁶). A 10% flexibility margin should be applied to this figure, resulting in a requirement for 12,375 dwellings over the LDP period from 2017 to 2032.

2.60 A total of 1,559 dwellings were completed between April 2017 and March 2019. As such, the residual housing need that is to be met over the remainder of the Plan period to 2032 equates to 10,816 dwellings.

⁶ Rounded from 746dpa

3.0 Housing Supply

3.1 Having established the level of housing need for the Lisburn and Castlereagh Plan Strategy, it is necessary to consider how this will be delivered through an assessment of supply. This Section provides an update of the components of housing supply that is set out in Table 3 of the Plan Strategy before addressing a number of detailed supply-side matters, including:

- 1 LCCC's approach to discounting the supply;
- 2 The need for a phased release of the housing requirement and supply;
- 3 Assessment against the Housing Evaluation Framework;
- 4 The role of transport planning; and,
- 5 Affordable housing delivery.

Components of supply

3.2 Table 3 of the draft Plan Strategy sets out the Strategic Housing Allocation over the Plan Period (2017-2032). The figures set out in the table take account of the 10% discount.

3.3 A summary of the components of supply is set out below:

Table 3.1 Strategic Housing Allocation over Plan Period

Component of supply	No. units
Potential remaining units	10,228
Strategic Mixed Use site West Lisburn/Blaris	1,350
Urban Capacity Sites	875
Windfall sites (1-4 units)	174
Windfall sites (5+ units)	1,155
Total	13,782

Source: Draft Plan Strategy Table 3

Remaining potential

3.4 Given that the Plan Period started in 2017, it is important to adjust these figures to take account of completions to date. LCCC has provided the following information regarding completions between April 2017 and March 2019 and the remaining potential within the main settlements, villages and small settlements, open countryside, and the West Lisburn/Blaris strategic site. The remaining potential is set out below as a gross and net figure (taking account of the 10% non-implementation allowance). These figures take account of dwellings that have been completed and planning permissions that lapsed prior to implementation⁷.

⁷ Please note figures for countryside are based on past trends

Table 3.2 Completions and remaining potential

Settlement	Units Completed		Remaining Potential (April 2019)	
	2017-18	2018-19	Gross (excl non-implementation allowance)	Net (incl non-implementation allowance)
Lisburn City	254	219	4,174	3,757
Lisburn Greater Urban Area	60	93	67	60
Castlereagh Greater Urban Area including Dundonald	174	187	1,510	1,359
Carryduff	30	18	1,507	1,356
Hillsborough & Culcavy	12	3	480	432
Moira	55	48	516	464
Total for City, Greater Urban Areas and Towns	585	568	8,254	7,428
Villages and small settlements	123	166	1,116	1,004
Open countryside	46	71	702	632
Total units	754	805	10,072	9,064
Strategic Mixed Use site West Lisburn/Blaris			1,500	1,350
Total number of units			11,572	10,414

Source: LCCC

- 3.5 In July 2018 LCCC consulted the owners of undeveloped land that was zoned for residential and employment purposes. At that time, there were 19 sites, or parts thereof, which did not benefit from planning permissions, as follows:
- 1 11 residential zonings;
 - 2 6 employment/industrial zonings;
 - 3 1 mixed use zoning (DA04 – Dromara); and,
 - 4 1 area of development potential (LC16/01 – Sprucefield).
- 3.6 Responses were received in respect of four of the residential zonings, with evidence of intended development provided in the form of pre-application discussions, the submission of planning applications, and the approval of planning permission:
- 1 CF04/04: 4.84ha. Pre-application discussions concluded that residential development would be acceptable in this location;
 - 2 DA03/02: 0.72ha. Planning application submitted for 14 dwellings and pending determination (LA05/2018/1055/F);
 - 3 LC04/14: 7.44ha. Planning permission granted for 73 dwellings (LA05/2018/0560/F and LA05/2018/0314/F) and application pending for a further 42 dwellings (LA05/2020/0269/F); and,
 - 4 MA04/08. 2.78ha. Planning permission granted for 64 dwellings (LA05/2017/1125/F) and application pending for a further 66 units (LA05/2020/0593/F).

- 3.7 Since that time, a planning application has been submitted for residential development (27 dwellings) on the 1.11ha site DA03/04 (LA05/2019/0701/F)⁸.
- 3.8 The implication of this evidence is that there are six sites, with a total area of 7.11ha for which the developers' intentions remain unknown. Assuming an average density of 35dpa, these sites would have capacity for a total of 250 dwellings. Whilst it is expected that these sites will be developed over the LDP period, this capacity equates to:
- 1 21.5% of the non-implementation discount that was applied to potential remaining units; and,
 - 2 c.16.5% of the effective over-supply from all sources against the residual need from 2019.
- 3.9 Although there is no evidence to indicate that these sites will not come forward for development over the LDP period, the potential number of units is limited and will not have any adverse impact on the ability to meet the overall housing need that has been identified for Lisburn and Castlereagh.
- 3.10 The remaining potential in the open countryside is based on a review of building control completion notices. Between 2012/13 and 2016/17⁹, 272 dwellings were completed in the open countryside, at an average of 54 dwellings per annum projected (excludes replacement dwellings). Projecting this forward over the remainder of the LDP period (2019 to 2032) equates to a total of 702 dwellings. Allowing for the 10% non-delivery allowance reduces this figure to 632 units.

Urban capacity sites

- 3.11 Taking account of updated information in respect of completions and planning permissions that have been granted, it is possible to update the potential number of units on urban capacity sites. Based on a review of the urban capacity sites and information provided by LCCC, we consider that the potential yield of such sites for inclusion in Table 3 should be reduced from 975 to 901 units. Allowing for the 10% reduction that is reflected in Table 3, this implies a reduction from 878 to 811. This reduction is based on the removal of the following sites:

Table 3.3 Updated urban capacity sites

UCS Ref	Site	UCS Yield	Commentary
36	146 Hillsborough Old Road, Lisburn	7	Subject to extant planning permission (LA05/2017/0547/F). Not yet constructed.
110	Vacant units fronting 18 Market Square and rear of 2 and 3 Wardsborough Road, Lisburn	28	Planning permission granted for construction of 28 apartments (LA05/2017/0907/F).
118	48-50 Bridge Street adjacent to Health Centre, Lisburn	6	Planning permission granted for mixed use development incorporating 3 No Retail Units and 6 No Apartments. (S/2014/0797/F).
138	56 Saintfield Road, Lisburn	13	Planning permission granted for erection of 3 detached and 4 pairs of semi-detached dwellings (11 units in total). UCS recorded capacity for 13 units (LA05/2015/0559/F)

⁸ Planning permission has also been granted for mixed use development on the 3.79ha site DA04 – Dromara (LA05/2019/0533/O). Pre-application discussions have commenced in respect of employment/industrial development on the 13.48ha site LC09 and mixed use development at the 1.4ha employment site LC14.

⁹ This period covers the five years prior to the start of the LDP period

204	Belmont Drive and Haddingtonhill, Lisburn	7	Site subject to planning application for development of 8 dwellings (LA05/2018/1102/F).
120	62 Lisburn Street, Hillsborough	13	Planning permission granted for demolition of existing dwelling and construction of 13 dwellings (LA05/2017/0218/O).
Total reduction		74	

Source: LCCC / Lichfields analysis

Windfalls

- 3.12 Table 3 of the draft Plan Strategy states that the Windfall potential is applied for 12 of the 15 years of the Plan period, based on past trends. It is appropriate that a windfall allowance has not been applied for the all 15 years of the LDP period. This is in order to prevent any risk of double counting with the “Potential Units Remaining” column. The Potential Units Remaining includes sites with planning permission (zoned sites and windfalls). It is reasonable to assume that any windfall sites that are delivered in the initial years after the base year would already have planning permission and will therefore be included in the Potential Units Remaining. In order to avoid double counting, it is therefore appropriate not to include any separate windfall allowance. Given the time taken to navigate the planning process and start and complete construction, and the length of outline planning permissions, LCCC has made the judgment that it is appropriate not to make any separate allowance for windfalls for three years (i.e. 2019/20, 2020/21 and 2021/22). On this basis, an allowance for windfalls is made for a ten year period (2022/23-2031/32). This reduction from the 12 year period identified in Table 3 of the draft Plan Strategy reflects the fact that this table has been updated by two years to reflect the availability of completions data for 2017/18 and 2018/19.
- 3.13 This update results in the following windfall figures:
- 1 Small site windfalls: 161 units; and,
 - 2 Large site windfalls: 1,070 units.
- 3.14 Application of the 10% non-implementation allowance would reduce these figures as follows:
- 1 Small site windfalls: 145 units; and,
 - 2 Large site windfalls: 963 units.
- 3.15 The application of a non-implementation allowance to the trend-based windfall figure represents a cautious approach to reflect the potential for a future reduction in supply from the source following adoption of the new LDP.

Total supply

- 3.16 Taking account of this assessment, we identify the total number of remaining units that will contribute to the residual housing requirement for LCCC as follows:

Table 3.4 Total potential over remainder of LDP period

	Potential units remaining	Urban capacity sites	Windfalls (1-4 units)	Windfalls (5+ units)	Total potential
Lisburn City	4,174	614	90	389	5,267
Lisburn GUA	67	0	2	200	269
Castlereagh GUA	1,510	115	40	230	1,895
Carryduff	1,507	133	9	70	1,719
Hillsborough & Culcavy	480	15	20	41	556

Moira	516	24	0	140	680
Villages and small settlements	1,116				1,116
Open countryside	702				702
West Lisburn/Blaris site	1,500				1,500
Total	11,572	901	161	1,070	13,704

Source: LCCC

- 3.17 It is important to note that, in translating these figures to Table 3 of the draft Plan Strategy, all figures within each settlement tier (including the countryside and West Lisburn) were reduced by 10% to account for potential non-implementation, as follows:

Table 3.5 Total potential over remainder of LDP period – minus non-implementation allowance

	Potential units remaining	Urban capacity sites	Windfalls (1-4 units)	Windfalls (5+ units)	Total potential
Lisburn City	3,757	553	81	350	4,741
Lisburn GUA	60	0	2	180	242
Castlereagh GUA	1,359	104	36	207	1,706
Carryduff	1,356	120	8	63	1,547
Hillsborough & Culcavy	432	14	18	37	501
Moira	464	22	0	126	612
Villages and small settlements	1,004				1,004
Open countryside	632				632
West Lisburn/Blaris site	1,350				1,350
Total	10,414	813	145	963	12,335

Source: LCCC

Discounting of supply

- 3.18 The draft Plan Strategy explains on pages 59 and 60 that a 10% non-implementation allowance was applied to existing housing commitments, urban capacity sites and windfalls “*due to the possibility of non-deliverability over the Plan period.*” The draft Plan Strategy explains this approach on page 60:

“The UCS recommends that a discount rate be applied to both the delivery of identified sites and housing allocations to allow for uncertainty within the market. Based on best practice within other parts of the United Kingdom, this is usually around 10%.”

- 3.19 A number of representations were received (examples cited below) in respect of the application of a non-implementation allowance:
- 1 The Department for Infrastructure “*welcome the allowance for windfall assessment which broadly reflects guidance set out in SPPS and PPS12*” although it seeks clarity as to the application of a discount to other sites.
 - 2 Turley suggests that the 10% discount “*is likely to be too low*” but does not provide any evidence to explain why a higher figure should be applied or what it considers it ought to be.
 - 3 Gravis Planning suggests that “*no reliance can be placed on windfall sites, given the uncertainty of availability of such sites coming forward during the plan period for social housing development.*” This view is made in spite of the fact that windfalls almost always form part of the identified housing supply in development plans and play an important role in contributing towards the delivery of market as well as affordable housing. Indeed, the

previous BMAP was criticised by the Planning Appeals Commission for not having provided a sufficient windfall allowance, recognising its contribution across the Belfast Metropolitan Area¹⁰.

The representation that was submitted by Gravis Planning goes on to state that “*Urban Capacity Sites and Windfall figures should be discounted given their speculative nature and as a result, they cannot be relied upon for housing delivery.*” It does not provide any commentary on the 10% discount contained in the draft Plan Strategy or indication of what level of adjustment it considers should be applied.

- 4 TSA on behalf of Rosemount Homes likewise expresses concern about placing any reliance on urban capacity and windfall sites coming forward for residential development over the Plan period.

3.20 It is known from experience of plan preparation and monitoring that over the lifetime of a development plan, many sites will come forward for development despite not being identified in the adopted plan. Such sites can make an important contribution to meeting identified housing requirements. They might become available due to changes in circumstances that were not anticipated at the time of Plan preparation. For example, a site in a different land use may become unexpectedly available and subsequently come forward for residential development. This is particularly important given the target contained within the SPPS for “*60% of new housing to be located in appropriate ‘brownfield’ sites within the urban footprints of settlements greater than 5,000 population*” (SPPS paragraph 6.134).

3.21 Paragraph 6.139 of the SPPS identifies a number of categories of sites that should be included in LDPs:

- 1 Housing commitments: “*Councils should take account of dwellings already constructed, approvals not yet commenced and residential development proposals likely to be approved.*”
- 2 Urban capacity studies which “*assess the potential for future housing growth within the urban footprint and the capacity for different types and densities of housing.*”
- 3 Allowance for windfall housing which is described as “*central to the assessment of future housing land requirement*”. It is therefore “*necessary to make full allowance for this [windfall sites] when deciding the number of sites to identify for development in the plan to prevent excessive allocation of housing land.*”

3.22 PPS12 likewise notes that existing commitments, urban capacity studies and windfall sites will play an important role in determining housing allocations in LDPs.

3.23 It is important to ensure that the approach taken in respect of any assumptions are realistic and take account of expected delivery rates and address the potential likelihood of non-delivery. However, it can be very difficult to anticipate which sites will – and which will not – come forward over the duration of a Plan period. It is for this reason that the application of a non-delivery allowance represents an important response to the likelihood of non-delivery particularly as the Plan system operates in two stages, and full detail on the designation of sites does not come forward until the Local Policies Plan (LPP). If it was possible to know in advance of the LPP whether a particular site would not come forward then the LDP could be amended accordingly¹¹.

3.24 Although other Local Government Districts in Northern Ireland are not currently proposing any such allowances for non-implementation, this approach is widely used elsewhere in the UK.

¹⁰ Report on Strategic Plan Framework, Public Local Inquiry, BMAP. Paragraph 3.2.29

¹¹ The Plan Strategy provides the broad allocation in accordance with the SPPS, however specific details in relation to supply will be further assessed at LPP stage.

More notably, in Wales, the Local Development Plan Manual (2020) specifically endorses the application of a non-delivery allowance and recognises that this is distinct to the flexibility allowance that is applied to the housing requirement contained within the LDP:

“Including the entire land bank in numerical terms in a housing provision can be a high risk strategy. If sites do not come forward as anticipated, or issues arise as part of the examination process, a lack of delivery can result in a potential shortfall of homes. Having a non-delivery allowance in the plan can help avoid this scenario.

“A ‘non-delivery allowance’ is factored into the land bank; discounting a proportion of the land bank based on local evidence. This may not be appropriate for all LPAs, but relevant for LPAs with a large number of land bank sites, not those with just a few sites, or in areas where the land bank is made up of numerous small sites which take a long time to complete. To be clear, a land bank non-delivery allowance is separate to the flexibility allowance (i.e. 10%) which is applied to the plan as a whole. Understanding the proportion of sites that did not come forward in the past can be a useful tool in this respect. Sites can be discounted individually, or applied as a percentage across the overall land bank. The latter is the simplest approach. Non-delivery allowances have ranged from 20-50% to date, dependent on local circumstances.” (Page 118).

3.25

Our review of a sample of local authorities in England and Wales has revealed that most apply an adjustment for the non-implementation of housing sites. Whilst not seeking to provide a comprehensive overview of the housing policies contained within all English and Welsh development plans, this analysis does demonstrate how this approach has been widely used by local authorities.

Table 3.6 Review of non-implementation allowance applied by local authorities in England and Wales

Local Authority	Percentage Discount	Source / Comment
East Hampshire	25%	Appendix 2 – Housing land supply table and trajectory
Cannock Chase	20%	Paragraph 4.27 states “flexibility is provided within the SHLAA via the application of a 20% non-implementation discount to all 0-5 year minor sites and all 6-15 year sites (bar those that are part of major 0-5 year sites).”
Telford and Wrekin	20%	Paragraph 5.1.2.3 states that the Council has made an assumption that some dwellings not yet built are unlikely to be delivered due to site specific problems or the expiry of permission. Consequently, Table 10, includes a discount of 20% for non-implementation.
Cardiff	15%	Table 1: Housing Provision over the Plan Period - Point 7 “15% flexibility allowance for possible reduced dwelling yield on brownfield sites in landbank and some 106 sites not coming forward.”
Elmbridge	15%	Paragraph 6.1 states “a 15% contingency allowance has been applied to unimplemented planning permissions and potential opportunity sites in order to take account of current uncertainties relating to the economy and the housing market.”
Babergh	10%	Paragraph 2.4.1 states that a 10% allowance for non-delivery is applied to existing commitments and windfall figures.
Burnley	10%	Policy SP2: Housing Requirement 2012-2032, footnote 20 states that a 10% non-implementation allowance is applied to commitments.
Calderdale	10%	Paragraph 6.3 states “Analysis of past windfall delivery and likely future trends has suggested the Council can include in its housing

		<p>trajectory, a total of 1,294 units as a reliable source of housing delivery. No allowances are made for windfalls in the first three years as this could potentially lead to double counting with sites with planning permission. It is considered that 162 units will be delivered in years 4 and 5, and 97 units will be delivered each year between years 6 and 15. This equates to 10% of the housing requirement for Calderdale”.</p> <p>The Calderdale Local Plan is currently at examination.</p>
Hambleton	10%	<p>Paragraph 5.6 states that “a 10% allowance to account for the small proportion of small sites that are unlikely to be implemented has been made.”</p> <p>The Hambleton Local Plan is currently at examination.</p>
Ipswich	10%	<p>Table 2: Housing Land Supply and Minimum Requirement includes discounted numbers (row 3 (Dwellings with planning permission) and row 4 (Dwellings with a resolution to grant planning permission (subject to the prior completion of a Section 106 agreement)). The notes set out after the table state these discounted numbers allow 10% slippage for planning permissions that may not be implemented.</p>
Kirklees	10%	<p>The table after paragraph 8.13 refers to a 10% lapse rate on planning permissions not allocated in the Local Plan to provide contingency where some planning permissions may not be delivered.</p>
Melton	10%	<p>Paragraph 4.2.14 states that an overall allowance for windfall development of no more than 10% has been made.</p>
Test Valley	10%	<p>Paragraph 5.41 states “to provide flexibility should some of the identified supply not come forward as anticipated the Council has applied a number of discounting measures when calculating its housing land supply. These measures include a 10% discount to the total of outstanding permissions (existing commitments) to account for possible non-implementation of sites of 1-4 dwellings. In addition the Council has included a 10% cushion on the residual requirement.”</p>
Wyre	10%	<p>Row C of the table included at paragraph 7.2.2 includes reference to small sites with planning permission being discounted by 10%.</p>
Stratford-on-Avon	5%	<p>Paragraph 5.2.19 states that a “conservative” 5% deduction for non-implementation has been applied and that this “excludes an additional allowance for windfalls within the five-year period above those homes already committed.” It also notes that “the calculation should also be seen in the context of the Core Strategy including a contingency of some 12.5%.”</p>

Source: Lichfields analysis

3.26 The average non-implementation allowance applied in these 15 development plan examples is 12.7%. The median figure is 10%.

3.27 This evidence demonstrates the rationale behind the application of a non-implementation allowance and shows that application of a 10% discount represents a reasonable and logical approach that, when taken with other measures such as the flexibility margin, will be important in ensuring that the housing requirement contained in the Lisburn and Castlereagh LDP can be achieved and that the Plan will be sufficiently flexible to respond to changing circumstances that may occur over time, as required by the Test of Soundness CE4 (coherence and effectiveness test).

Phasing of housing supply

3.28 A number of representations have considered the issue of phasing of land releases. Noting that the draft Plan Strategy does not propose the introduction of a managed release of housing land in settlements, they suggest that consideration should be given to:

- 1 The identification of “Phase 2” land which is to be held in reserve until “Phase 1” land (live permissions, likely permissions, urban capacity sites and existing zonings) are developed; and,
- 2 The use of Short Term Land Reserves to be released at the end of the Plan period, if required.

3.29 We consider each of these matters in this section.

Phasing of land releases

Policy position

3.30 Paragraph 6.142 of the SPPS requires LDPs to “provide for a managed release of housing land, in line with a ‘plan, monitor and manage’ approach.” It does not, however, specifically require any phasing policies to be applied. The RDS 2035 similarly does not specifically require the phased release of land for development over the LDP period.

3.31 The SPPS provides an overview of the two-stage LDP approach that now applies in Northern Ireland:

- 1 The Plan Strategy sets out the council’s objectives in relation to the development and use of land in its area and provides the strategic policies for the implementation of those objectives and other relevant matters; and,
- 2 The Local Policies Plan (LPP), which is prepared after adoption of the Plan Strategy, is to contain local site specific designations, policy criteria and key site requirements consistent with the Plan Strategy.

3.32 The Department for Infrastructure’s Development Plan Practice Note 7 provides further detail in respect of the Plan Strategy. It notes in paragraph 1.2 that:

“The PS should establish the strategic direction early in the plan process in order to provide a level of certainty on which to base key development decisions in the area as well as the necessary framework for the preparation of the local policies plan.”

3.33 The focus of the Plan Strategy must be on strategic matters, including the overall housing requirement, the level of provision for each settlement (including existing commitments) and the identification of broad locations for the delivery of housing and other strategic development needs. To this end, it should “set a framework for more detailed housing requirements such as zonings, key site requirements for specific sites etc in the local policies plan (LPP)” (paragraph 13.3). Although the Plan Strategy is expected to include strategic policies and proposals on topic areas, paragraph 6.4 states that “depending on the nature of the issues, a council must consider whether it is more appropriate to address these at the strategic level, i.e. in the PS or at more site specific local area, in which case they should be addressed in the Local Policies Plan (LPP).”

3.34 Development Plan Practice Note 8 provides detail in respect of LPPs. Reflecting the points set out in Development Plan Practice Note 7, this states that the purpose of the LPP is to set out “a council’s local policies and site specific proposals in relation to the development and use of land in its district” (paragraph 1.1). As such they must “contain the local policies, including site

specific proposals, designations and land use zonings required to deliver the council’s vision, objectives and strategic policies” (paragraph 1.3). It follows that the LPP will be much more detailed and will provide a means by which to “show how the council’s vision, objectives and strategic policy as set out in its PS are to be achieved” (paragraph 5.3). It will therefore address matters that would not be appropriate within the Plan Strategy. This is likely to include the phased release of specific zonings, if required.

- 3-35 Both Development Plan Practice Notes emphasise the importance of ensuring that the Plan Strategy and LPP incorporate a degree of flexibility to ensure:
- 1 That the objectives and strategic policies for the area can be delivered in the case of the Plan Strategy; and,
 - 2 The delivery and implementation of the policies and proposals in the case of the LPP.

- 3-36 The two Practice Notes also underline the need for comprehensive and reliable monitoring to ensure how the objectives of the Plan Strategy and LPP are being achieved and to determine whether any changes are required to ensure the continued delivery at each stage of the plan.

- 3-37 This approach to plan preparation is fundamentally different to that which applied prior to the enactment of the Planning Act (Northern Ireland) 2011 through a “one-stage” Plan process. As set out in the (now superseded) PPS1, the approach was that “*development plans may be in the form of area plans, local plans or subject plans*” (paragraph 35) and were expected to incorporate zonings of land for particular forms of development, including housing. Paragraph 40 of PPS1 recognised that it may be appropriate to release site zonings in phases:

“Where circumstances warrant, plans may specify a phased release of development land. Phasing may be necessitated by considerations relating to infrastructure or the adequacy of other services, which may indicate that a particular area cannot be released for development until a particular stage in the plan period. Phasing may also be introduced in areas that are under severe pressure for development, where there is evidence that market demand would exhaust total planned provision in the early years of the lifetime of the plan. Where phasing provisions are included in a plan, they will normally take the form of a broad indication of the timescale envisaged for the release of the main areas or identified sites. Phasing proposals will be explained and justified in the plan’s written statement. Allowance will be made for a reasonable degree of choice and flexibility, in order to ensure that the market can work effectively and efficiently.”

- 3-38 The phasing of sites was also considered in PPS12¹². Appendix 2 of PPS12 identified three approaches to managing the release of site, as follows:

- 1 Criteria based release;
- 2 Site released based on ranking; and,
- 3 Phasing of the release of sites over time periods defined within the plan:

“The use of phasing is considered the most likely to provide the certainty and flexibility required for the plan, monitor and manage mechanism in Northern Ireland.”

- 3-39 As set out above, there is no equivalent provision in the SPPS or in Development Plan Practice Notes 7 or 8. Any suggestion that the draft Plan Strategy should be amended to include phasing policies in order to accord with the approach set out in the BMAP and other historic plans must be viewed in the context of this major change in approach to plan preparation and legislative change bringing about a two-stage Plan process. Whilst it might have been appropriate for

¹² PPS12 is to be superseded following adoption of the Plan Strategy.

historic plans to incorporate phasing policies, we do not consider this to be an issue that should be addressed as part of the Plan Strategy. Instead, any phasing approach should be addressed in the LPP, if required.

Meeting the housing requirement

- 3.40 As set out above, in calling for a managed release of housing land in settlements, one of the representations differentiated between “Phase 1” land which – it defined as live permissions, likely permissions, urban capacity sites and existing zonings – and “Phase 2” land which would be held in reserve until the Phase 1 land was exhausted. Table 3 of the Draft Plan Strategy identifies a total supply of 13,782 units over the LDP period. This is updated in Table 3.5 above which identifies a total supply of 12,335 units. Of this total:
- 1 73.5% represent existing commitments;
 - 2 6.6% represent urban capacity sites; and,
 - 3 9.0% represent windfall releases.
- 3.41 Each of these components – which account for 89.1% of the total supply¹³ – comprise the Phase 1 releases identified above. It would be difficult to implement any phased release of existing commitments as there is no mechanism by which the planning system could now seek to control their delivery retrospectively. Indeed, sites that benefit from extant planning permission will be subject to conditions requiring the commencement of development by a certain date such that they are likely to come forward earlier on in the Plan period. PPS12 notes that “*site release is the point at which planning permission is granted*” rather than the point of site delivery. However, it is noted that the mix of sites with existing permission which are available now, and zonings, urban capacity sites and windfalls which will be available following the grant of planning permission, means that there will in effect be an in-built phased release of sites.
- 3.42 The quantum of units that are acknowledged to be included within “Phase 1” negates any need for the implementation of a second phase.
- 3.43 Table 3 of the draft Plan Strategy also identifies West Lisburn/Blaris as a strategic zoning. In considering whether this site would be appropriate for a phased release, it is important to note that:
- 1 A planning application has been submitted for the development of this site. This broadly reflects the proposed zoning and the West Lisburn Development Framework Review. Whilst the application is still subject to consideration and determination by LCCC, it could be incorporated in the category of “likely permission” and therefore in Phase 1.
 - 2 The lead-in time associated with a strategic development such as West Lisburn/Blaris means that phasing it to come forward later in the LDP period could risk it not being able to deliver any houses before 2032.
- 3.44 Taking account of the West Lisburn/Blaris site, together with the other categories of housing land, means that sufficient provision has been made to meet the identified housing requirement with ample flexibility in the event that some sites do not come forward at the rate required. On this basis, no further flexibility is required in the form of reserve sites or phased releases.

Phasing of housing requirement

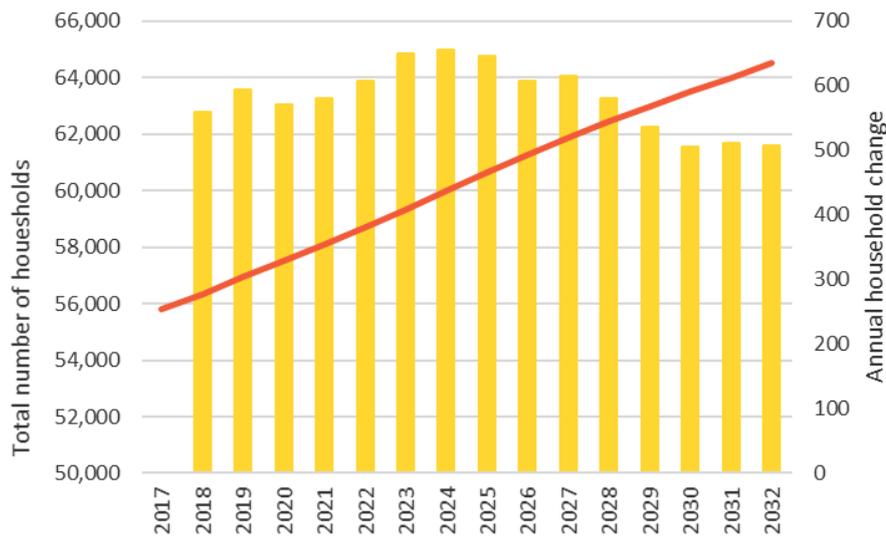
- 3.45 Any case for a phased release of housing land in Lisburn and Castlereagh is undermined by the nature of the housing supply that will contribute to meeting the housing requirement. It is also affected by the fact that the housing requirement figure can be spread evenly across the LDP

¹³ The remaining 10.9% is accounted for by the West Lisburn/Blaris strategic site.

period. There is no justification for a “stepped” approach to be taken with different requirements applied across different phases of the Plan period:

- 1 The household projections that underpin the HGIs are relatively consistent across the LDP period and indicate that there will be a steady increase in the number of households across this period.

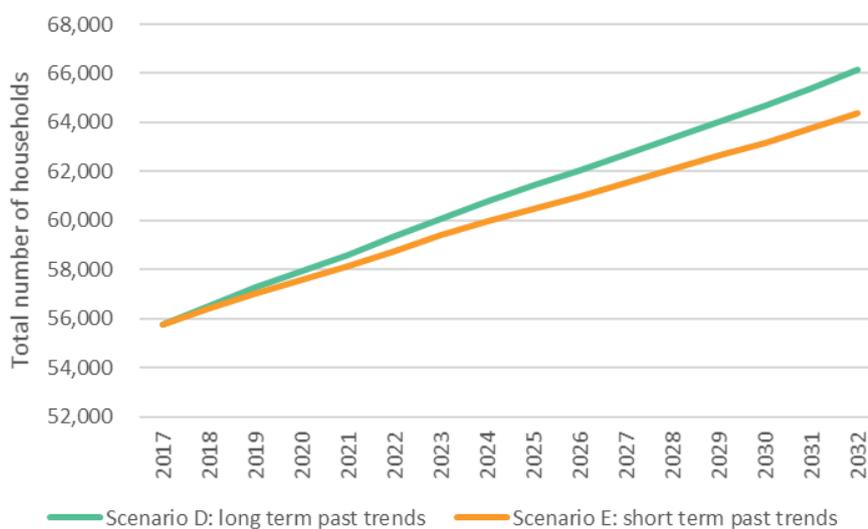
Figure 3.1 Household change between 2017 and 2032



Source: 2016-based NISRA household projections

- 2 The employment-led analysis similarly shows a steady increase in household change under the long- and short-term scenarios that were modelled in the Housing Growth Study:

Figure 3.2 Household change between 2017 and 2032 based on economic-led scenarios



Source: Lichfields analysis / Housing Growth Study

- 3 The proposed housing requirement of 825dpa does not represent such a substantial step change from past delivery rates (an average of 705dpa between 2004/5 and 2018/19) to necessitate a gradual transition to the higher requirement figure.

Short Term Land Reserve

- 3.46 Holding part of the housing supply in a Short Term Land Reserve (STLR) represents an alternative form of phasing. The Planning Appeals Commission report into the BMAP recommended that the Department should undertake a further assessment of potential windfall releases in order to assist in providing a robust analysis of the additional land required to meet the HGI and Short Term Land Release (STLR). The Planning Appeals Commission recommended holding land for 11,155 units (14.2% of the housing supply of 78,500 recommended by Planning Appeals Commission) in a STLR to be released at the end of the Plan period, if required, to facilitate the provision of a continuous supply of housing land, as required by PPS12. However, the Department identified a supply of 82,000 dwellings and concluded that an STLR was not required.
- 3.47 Reference has been made to the BMAP PAC recommendation in respect of STLRs although no direct suggestion is made that the Lisburn and Castlereagh LDP should include any STLRs. However, in respect of this matter, we note that the proposed supply exceeds the residual requirement by 14.0% - a greater proportion than the 4.5% excess that applied in respect of the BMAP and was found by the Department to be sufficient to justify not making any STLRs. The effective over-supply of land for residential development that has been identified in the draft Plan Strategy is closely aligned with the 14.2% that was proposed to be held in an STLR in the BMAP.
- 3.48 The level of supply that has been identified in the draft Plan Strategy and the sources of supply, including the zoning of a strategic site at West Lisburn/Blaris, will be sufficient to ensure a continuous supply of housing over the LDP period.
- 3.49 As outlined above, the fact that the BMAP was prepared under a different plan system reduces the weight that can be given to any suggestion that a STLR should be applied to the draft Plan Strategy to ensure compliance with the BMAP. Neither the SPPS nor the RDS 2035 make any reference to STLRs and Development Plan Practice Notes 7 and 8 similarly do not refer to any such provision. Of the three Councils within the wider BMA that have produced a draft Plan Strategy, neither Belfast City nor Antrim & Newtownabbey propose STLRs in their emerging LDPs¹⁴.
- 3.50 The implication is therefore that there is no need for a STLR to be established given the specific circumstances that exist within Lisburn and Castlereagh in order to meet the identified housing requirement or to ensure a continuous supply of housing land.

Approach to phasing elsewhere

- 3.51 As detailed above, neither of the draft Plan Strategies for Belfast City and Antrim & Newtownabbey propose any form of phasing of the release of land for housing development. Whilst we have undertaken a review of the approach to phasing that has been applied elsewhere in the UK, any consideration of such an approach should be viewed in the context of an appreciation of the approach to plan preparation, with single Local Development Plans being prepared in Scotland and Wales and single Local Plans prepared in England (in place of the previous two-tier system of Core Strategies and Development Management/Site Allocations Plans¹⁵). This represents a different approach to the two-tier system that applies in Northern Ireland and will have a bearing on the extent to which any examples of phased releases elsewhere in the UK would have any direct applicability to LCCC's draft Plan Strategy.

¹⁴ The third authority is LCCC

¹⁵ It should be noted, however, that pending the preparation of a new local plan, the statutory development plan operative in many authorities in England currently comprises a Core Strategy and separate site allocations/development management development plan document

3.52 Although not intended to represent a comprehensive review of all local authorities in the UK, our review has not identified any examples of Short Term Land Reserves. As set out below, there are, however, examples of local authorities that have identified a housing requirement for specific (five year) phases of the Plan period. The phasing of site releases then follows, although in some cases (e.g. Merthyr Tydfil, Newport, Powys and Rhondda Cynon Taf) this is provided for monitoring purposes and to inform the housing trajectory that is specifically required by the Development Plans Manual¹⁶:

“A housing trajectory must be prepared to support the Deposit Plan and embedded in the plan as an Appendix, clearly articulating the anticipated annual and cumulative build rate. Housing trajectories should include a steady flow of housing sites through the plan period, and not be unduly loaded towards the end of the plan period” (paragraph 5.65).

3.53 Whilst this provides an important basis for monitoring, it does not serve the same function as STLRs or reserve sites as there does not appear to be any policy restriction in respect of the early (or later) delivery of these sites.

3.54 In other cases there are specific reasons for the application of a phased release of sites, none of which are directly applicable to LCCC. These are illustrated below:

Table 3.7 Rationale for phasing of housing requirements and release of sites

Local authority	Rationale for phasing of housing requirement / sites
Bradford	To manage growth in a sustainable manner in the context of the housing requirement being much higher than in previous plans and therefore to avoid unacceptable pressure on community resources and infrastructure. Consider that releasing all land at the same time could undermine delivery as a result of development outstripping the ability of the area to provide infrastructure.
Blaenau Gwent	In recognition of the step change required to increase the build rates from the current low levels. A stepped requirement would enable the transition from the lower UDP figure to the higher LDP requirement. The first phase covered the period from 2006 to 2011. This was prior to adoption of the Plan and so sites phased for this period all had to have been completed at date of adoption. The stated phasing of sites is indicative and if the situation alters it will be acceptable for developments to come forward early.
Bridgend	The housing requirement was split into 5 year phases (first one was prior to adoption of Plan) in reflection of the fact that economic prospects are not expected to be uniform during the Plan period, with the local economy experiencing a decline followed by a period of much higher growth.
Conwy	Contingency sites held in reserve for managed release if allocated sites fail to deliver.
Dover	The Plan was prepared in the context of recession and it was not known how long or deep the impact would be on the take-up of the Strategy’s proposals. The phasing strategy therefore included some flexibility for timings to vary due to market conditions. A slower start would result in the uplift in growth taking place later in the Plan period, but would not prevent the key projects from being delivered, particularly as the strategy allows for housing and employment growth to continue beyond 2026.
Reigate and Banstead	Green Belt releases phased for later in the Plan period, reflecting the fact that urban extensions are only required after 2022 when most of the supply from existing urban areas would have been built out and would no longer be available.

¹⁶ Development Plans Manual Edition 3 (March 2020) <https://gov.wales/sites/default/files/publications/2020-03/development-plans-manual-edition-3-march-2020.pdf>

Rother	Additional allocations in some settlements with high levels of recent or committed development were phased later on in the Plan period.
Selby	Phased approach was applied to take account of potential land availability constraints in Tadchester, with some sites only to be released in the event that development in Tadchester does not come forward at the anticipated rate: <ul style="list-style-type: none"> - Phase 1: The preferred sites in/on the edge of Tadcaster which will be released on adoption of the Site Allocations Local Plan. - Phase 2: A second choice of preferred sites in/on the edge of Tadcaster which will only be released in the event that less than one third of the minimum dwelling requirement for Tadcaster has been completed after 5 years following the adoption of the Site Allocations Local Plan. - Phase 3: A range of sites in/on the edge of settlements in accordance with the hierarchy in Policy SP2 which will only be released after 3 years following release of Phase 2 if completions are less than 50% of the minimum dwelling requirement for Tadcaster.
Stratford-on-Avon	Reserve sites have the capacity to deliver up to 30% of the housing requirement and will be released in order to: <ul style="list-style-type: none"> - Rectify any identified shortfall in delivery; - Contribute to meeting any additional needs associated with a growth in jobs at Jaguar Land Rover arising from development of the employment allocation at Gaydon Lighthorne Heath; - Contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA as demonstrated through the agreed outcomes of ongoing joint working between the Coventry and Warwickshire local planning authorities; and, - Contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA that it is accepted through co-operation between the relevant councils as needing to be met within the HMA and most appropriately being met within the District. <p>A phased approach to the housing requirement was applied in order to meet the identified housing need, recognising that the first phase had already passed and it was deemed to be inappropriate to retrospectively apply a higher target.</p>

Source: Lichfields analysis of development plans

3-55 It is important to note that the majority of development plans do not include any formal phasing policies and that the specific examples identified above represent the overwhelming minority of cases.

Implications

3-56 It therefore follows that the approach that LCCC has adopted by not proposing a phased release of housing land is entirely appropriate in the context of the approach to plan preparation in Northern Ireland and is consistent with that applied by the majority of authorities elsewhere in the UK.

3-57 Critically in respect of this matter, the evidence shows that:

- 1 There is no need for a stepped housing requirement;
- 2 There is no basis for a phased approach to land releases in the Plan Strategy, especially given the reliance on commitments and the need for early progress on the West Lisburn/Blaris site in order to ensure that it can deliver new housing within the emerging LDP period;

- 3 It is not appropriate for a Plan Strategy to adopt a phased approach to release of sites – that is a matter that should be addressed in the LPP, if required; and,
- 4 The continued and effective monitoring of the LDP, together with the requirement to undertake a review every five years, will ensure that the housing requirements can be met and that there will be a continuous supply of housing.

Assessment against Housing Evaluation Framework

3.58 The RDS 2035 sets out the objective of “*managing housing growth to achieve sustainable patterns of residential development*” under regional guidance RG8. In order to achieve this objective, it emphasises the importance of meeting the needs of the whole community and places emphasis “*on the importance of relationship between the location of housing, jobs, facilities and services and infrastructure*” (paragraph 3.15). In particular, it seeks to:

- 1 Ensure that development patterns do not have an adverse impact on environmental resources and build heritage;
- 2 Mitigate the risk of flooding by avoiding those areas known to be at risk;
- 3 Focus high quality housing within existing urban areas;
- 4 Avoid causing unacceptable damage to the local character and environmental quality or residential amenity of the surrounding area;
- 5 Promote housing as part of mixed use developments;
- 6 Ensure an adequate provision of necessary infrastructure;
- 7 Encourage compact urban forms and promote more housing within existing urban areas; and,
- 8 Seek to locate 60% of new housing on appropriate brownfield sites within the urban footprint of settlements with a population of more than 5,000 people.

3.59 These matters are brought together in the requirement to apply the Housing Evaluation Framework (HEF) which contains six tests that will inform judgments on the allocation of housing growth:

Table 3.8 Housing Evaluation Framework

Resource Test	Studies should be carried out to assess and detail the existence of community assets and physical infrastructure such as water, waste and sewage, including spare capacity.
Environmental Capacity Test	An assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made.
Transport Test	Studies should be carried out to assess the potential for integrating land use and public transport and walking and cycling routes to help reduce reliance on the car.
Economic Development Test	The potential to facilitate and appropriate housing and jobs balance and to unlock any major strategic development opportunities should be assessed and detailed.
Urban and Rural Character Test	Assessment should be made of the potential to maintain a sense of place, and to integrate new development in a way that does not detract from the character and identity of the settlement.

Community Services Test	The potential to underpin and, where necessary, reinforce the community service role and function of the settlement should be assessed and detailed.
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Source: RDS 2035

3.60 The SPPS states that housing allocations in Local Development Plans should be informed by the HEF, alongside a number of other considerations, as follows:

- 1 RDS 2035 Housing Growth Indicators;
- 2 Allowance for existing housing commitments;
- 3 Urban capacity studies;
- 4 Allowance for windfall housing;
- 5 Application of the sequential approach and the identification of suitable sites for settlements of over 5,000 population;
- 6 Housing Needs Assessment / Housing Market Analysis; and,
- 7 Transport Assessments.

3.61 In considering its housing strategy, LCCC has had full regard to all of these considerations. Part 4 of Technical Supplement 6: Countryside Assessment provides a detailed assessment of all settlements against the HEF criteria set out above, together with two additional criteria (relating to social equity and development constraints) that formed part of the historic HEF process. The results of this analysis are contained in Appendix 2 of TS6 and repeated in Appendix 1 of this Topic Paper. Each settlement was given a score of high, medium or low for each criteria.

3.62 Neither the RDS 2035 nor the SPPS makes any comment regarding the weight that should be applied to the six HEF criteria and it is therefore assumed that they are all weighted equally. On this basis, it is possible to quantify the results of the analysis by applying the following scores:

- High: 3 points;
- Medium: 2 points; and,
- Low: 1 point

3.63 This analysis highlights a differentiation between the different settlement tiers, with:

- 1 Lisburn (the only City in Lisburn and Castlereagh) achieving a score of 17 out of 18;
- 2 The other main settlements achieving scores of between 14 and 16;
- 3 Villages achieving scores of between 10 and 14; and,
- 4 Small settlements achieving scores of between 8 and 13.

3.64 A summary of the scores is set out below:

Table 3.9 HEF results for each settlement tier

Settlement tier	Settlement	Score	Median score
City	Lisburn City	17	17
Urban settlement	Castlereagh Greater Urban Area	16	16
	Carryduff	14	
	Hillsborough & Culcavy	16	
	Moira	15	
Villages	Highest score: Moneyreagh	14	12
	Lowest score: Annahilt, Drumbeg	10	

Small settlements	Highest score: Legacurry, Long Kesh	13	10
	Lowest score: Boardmills, Carr, Drumlough Road, Lurganville, Magherconluce	8	

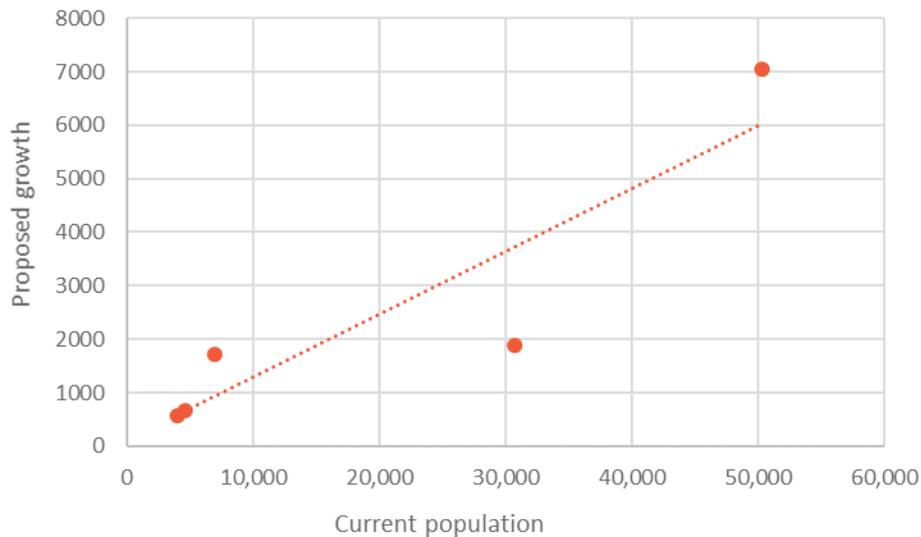
Source: LCCC

3.65 This is important in demonstrating the firm relationship that exists between the settlement hierarchy and the HEF scores. The level of growth that is proposed for each settlement tier reflects these outcomes.

3.66 Although the presence of committed sites had a bearing on the distribution of future growth, the approach that has been taken by LCCC reflects a number of additional considerations, most notably including the fundamental objective of concentrating growth into the most sustainable locations whilst recognising the important role that housing development can have in smaller settlements. To this end, it is important to note that there is a positive correlation between the level of growth that is anticipated in each settlement and:

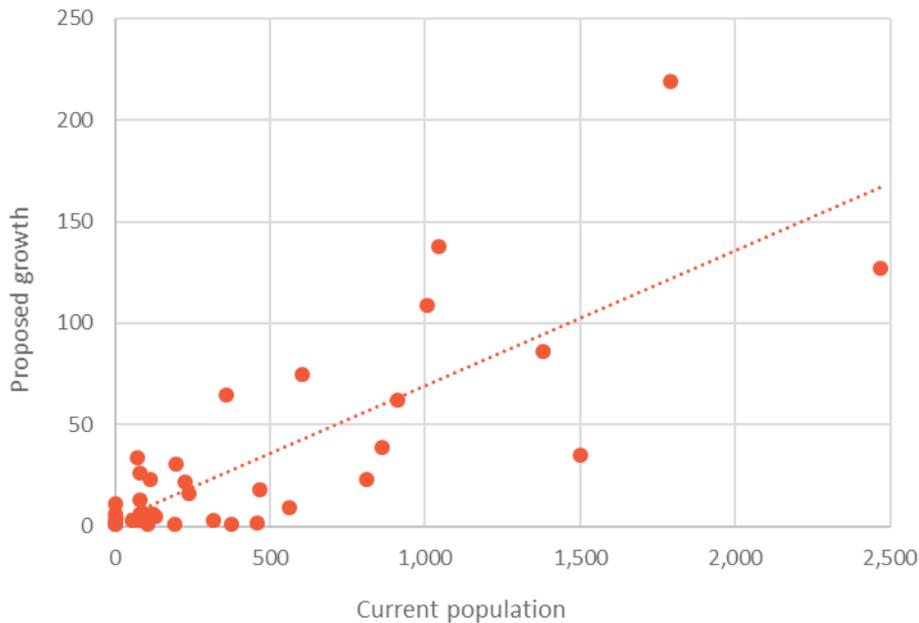
- 1 The HEF score; and,
- 2 The existing size of each settlement.

Figure 3.3 Correlation between proposed growth and current population (Lisburn City and towns)



Source: LCCC / Lichfields analysis

Figure 3.4 Correlation between proposed growth and current population (villages and small settlements)



Source: LCCC / Lichfields analysis

3.67 It should be noted that neither the RDS 2035 nor the SPPS specifically require the identification of a housing requirement for individual settlements. On this basis, the approach that has been applied by LCCC seeks to ensure that the overall housing requirement for the Council area can be achieved within the following key parameters:

- 1 The established and identified settlement hierarchy;
- 2 The sustainability of individual settlements, as reflected in the HEF scores;
- 3 The known supply in each settlement; and,
- 4 Any specific constraints in different parts of the authority area.

3.68 The potential of settlements to expand has influenced the distribution of growth but this must be viewed in the context of the overall housing need which is set by reference to demographic, household and economic factors rather than the ability to deliver growth. Conversely, it is not the case that all settlements with capacity should be expected to grow to their full potential. Such an approach could undermine the objective for sustainable development across Lisburn and Castlereagh. Given the level of housing need that has been identified and the level of flexibility that already exists in respect of the housing supply above that need, such an approach is not required.

3.69 The approach that has been adopted by LCCC represents a logical response to the objectives of achieving sustainable development in that opportunities for development within settlements should be considered in advance of urban extensions. The exception to this is the proposed zoning of land at West Lisburn/Blaris for mixed use development. This is considered in detail in Section 4 but ultimately reflects the status of Lisburn as the only City in Lisburn and Castlereagh and at the top of settlement hierarchy. Further details of the approach taken in respect of the key settlements is set out below:

Table 3.10 Assessment of proposed housing growth in Lisburn City and main towns

	Existing population	Units built (2004/5-2018/19)	HEF score	Proposed growth ^{17,18}	Commentary
Lisburn	50,358 ¹⁹	4,932 ²⁰	17	6,333 ²¹	Main settlement in Lisburn and Castlereagh. Identified as a Level 4 Principal City in RDS Hierarchy of Settlements. An appropriate focus for further development. Proposed quantum of growth (51.3% of LCCC total) is slightly higher than past trends (46.6% of LCCC total).
Castlereagh	30,717	2,007 ²²	16	1,706	Future growth represents a lower proportionate share of growth (13.8% cf. 19.0%) but reflects known capacity constraints.
Carryduff	6,947	307	14	1,547	A significant increase in quantum of development in response to past under-supply which has failed to reflect the scale of the settlement (6.1% of LCCC population) and resultant pent-up demand for development.
Hillsborough & Culcavy	3,953	367	16	501	Neither settlements are capable of accommodating large-scale growth but are key settlements with capacity for some further development. The share of future development (Hillsborough & Culcavy: 4.1% of LCCC total; Moira: 5.0%) is similar to share of past trends (Hillsborough & Culcavy: 3.5% of LCCC total; Moira: 3.8%) and the population of each settlement (Hillsborough & Culcavy: 3.5% of LCCC total; Moira: 4.0%)
Moira	4,584	402	15	612	

Source: Lichields analysis

3.70

Over 85% of the proposed growth is located in the main urban areas. This represents a reflection of the sustainability of the main settlements and their ability to accommodate further growth. It also reflects the requirement of the RDS 2035 for local planning districts to make judgements about the balance of growth in urban and rural areas:

“Another important step in this allocation process is making judgements to achieve a complementary urban/rural balance to meet the need for housing in the towns of the district and to meet the needs of the rural community living in smaller settlements and countryside” (paragraph 3.21)

¹⁷ Figures represent total capacity and comprise remaining potential, urban capacity sites and windfall potential

¹⁸ Figures take account of 10% discount

¹⁹ Figure comprises Lisburn City and Greater Lisburn area

²⁰ Figure comprises Lisburn City and Greater Lisburn area

²¹ Including strategic West Lisburn/Blaris site

²² Greater Castlereagh area

- 3.71 Whilst significant levels of growth would not be expected in rural areas, they do serve an important role in providing services and facilities that will serve the surrounding countryside.
- 3.72 The approach to growth in the villages and small settlements balances the capacity for growth and HEF score. The level of growth in the villages equates to an average of 69 dwellings per settlement, whilst the growth in small settlements is lower at 11 per settlement. This reflects the larger size of villages (average population of 1,000 people cf. 150) and the higher HEF scores (average 12 cf. 10).
- 3.73 The relative limited allowance that has been made for future housing delivery in the open countryside equates to 5% of the total housing supply. This reflects a recognition that a small number of dwellings are constructed in the open countryside each year and represents a continuation of past trends based on the existing regional policy-led approach.
- 3.74 Whilst recognising the extent to which existing commitments are expected to contribute to the future housing supply, the approach that has been adopted by LCCC in respect of the distribution of development is entirely consistent with the requirement of the RDS 2035 to “manage housing growth to achieve sustainable patterns of residential development” (RG8). It reflects an understanding of the role of different settlements across the Lisburn and Castlereagh area and the need to achieve a level and distribution of growth that is both deliverable and capable of contributing towards more sustainable patterns of development. The HEF has played an important role in this process, although it is not possible for this to act as the only factor in considering the distribution of growth. This is because it considers just six criteria and the application of a high, medium or low score to each means that there may not be significant variation in the HEF scores achieved for different settlements. It is a useful tool but, as recognised by the SPPS, is just one of a number of factors to be taken into account.
- 3.75 By following the policy requirements contained in the RDS 2035 and SPPS, and applying its own policy judgements, LCCC has been able to establish a robust and sustainable approach to the distribution of housing growth. The extent to which existing commitments will play a role in future housing delivery is not considered to undermine the integrity of the settlement hierarchy or the sustainability of development. Rather, it supports such attributes by virtue of the fact that planning permission will only have been granted for sites in sustainable locations and that are acceptable in policy terms.

Role of transport planning

- 3.76 The importance of ensuring that new developments are accessible and the growth that is proposed by the LDP would not have any unacceptable transportation impact has underpinned the approach taken by LCCC in preparing the draft Plan Strategy. This is summarised in paragraphs 1.4 and 1.5 of the LCCC’s Technical Supplement 8: Local Transport Study:
- “This growth requires careful consideration of the impact of land-use planning on schools, housing and employment and the transport infrastructure that sustains it.*
- “It is important that the new plan is based on an accurate assessment of the scale and type of development to be planned and its relationship with existing transport infrastructure and the wider region. It is recognised that the transportation network does not work in isolation and that people live, work and socialise in different council areas, so the emphasis should also be on neighbouring council areas and their associated planned transport infrastructure. The best information has been used in compiling this paper however it may need to be revised in light of the release of any new data.”*

3.77 The vision of the RDS 2035 in respect of regional transportation is “to have a modern, sustainable, safe transportation system which benefits society, the economy and the environment and which actively contributes to social inclusion and everyone’s quality of life.” This has been translated into Strategic Policy 20 of the draft Plan Strategy, as follows:

“The Plan will support development proposals that:

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

3.78 LCCC has also had regard to the requirements of paragraph 6.301 of the SPPS for the following transportation issues to be considered by councils in the preparation of their LDPs:

- 1 “Land use allocations and associated transport infrastructure: the LDP should provide the means to promote, influence and deliver a shift to more sustainable travel modes.*
- 2 “Zoned sites: should include key site requirements for walking and cycling infrastructure or phasing to tie in with planned improvement of public transport.*
- 3 “Freight and storage: the LDP should allocate land for distribution and storage that are readily accessible to the Regional Strategic Transport Network.*
- 4 “New transport schemes, walking and cycling: including proposals for road, rail, public transport, Park & Ride, cycle/pedestrian networks or planned improvements should be identified*
- 5 “Disused transport routes: the LDP should identify and safeguard disused transport routes, such as former railways and canals where there is a reasonable prospect of re-use*
- 6 “Car parking: the LDP should identify existing and proposed town centre car parks, identify park & ride sites and consider a range of initiatives to encourage a modal shift from car usage*
- 7 “Protected routes: the LDP will identify protected routes.”*

3.79 The SPPS does not, however, stipulate whether these issues are to be addressed in the Plan Strategy or the Local Policies Plan.

Addressing transport issues in the Plan Strategy and Local Policies Plan

3.80 The differing role and functions of Plan Strategies and Local Policies Plans has been considered in this Topic Paper in relation to phasing policies. The fact that LPPs are more detailed and contain local site specific designations, policy criteria and key site requirements also means that they will be the appropriate policy vehicle for detailed consideration of infrastructure requirements in respect of individual sites. This point is underlined in the Executive Summary to the Local Transport Study, which is set out in paragraph 4.1 of Technical Summary 8:

“The LTS presents a range of measures for walking, cycling, public transport and roads up to 2030, in addition to the linkages with the Regional Strategic Transport Network Transport Plan (RSTNTP). However, at this stage, the location of the transport measures are not described in detail. The detail and specific schemes will be added at LDP Local Plan Policies Stage, when land use zonings are identified.” (emphasis added).

3.81 To this end, the Local Transport Study does not propose identified schemes but rather *“introduces a framework against which future proposals will be delivered.”* (Executive Summary, Technical Summary 8 paragraph 4.6).

3.82 As detailed previously in this Section, there is a significant reliance on existing commitments in contributing to the future housing supply in Lisburn and Castlereagh. Transport and infrastructure considerations would have been taken into account during the determination of those previously approved individual development proposals. Notwithstanding the recognition that the LPP is the most appropriate part of the LDP to address transport and infrastructure considerations, the fact that such matters would have already been addressed is important in underlining the deliverability of committed sites and further demonstrates the fact that the potential housing supply is based on robust evidence.

3.83 There are three strategic sites²³ contained within the draft Plan Strategy which have been taken forward from the previous BMAP. Full consideration of transportation impacts has therefore already been assessed through that process. Only one of these strategic allocations (West Lisburn/Blaris) has been changed from its previous designation (solely for employment). As set out in Section 4, this is located within the existing settlement development limit and includes a proposal for a new link between the M1 and Knockmore. A planning application has been submitted to the Council for the development of this road. The new route will be critical in unlocking the site for housing and employment purposes, and will also provide a major benefit in terms of improved public transport connections, including the (expanded) Park and Ride facility and the proposed new Knockmore rail halt identified under the previous Belfast Metropolitan Transport Plan which accompanied BMAP. It will also help to ease congestion in Lisburn City Centre (heavy goods vehicles in particular) and provide an alternative route to Belfast – offering a strategic benefit if, for example, the M1 were closed or blockage should occur at the Sprucefield junction. The transportation issues and requirements associated with this strategic development have been carefully taken into account and are reflected in the Sustainability Appraisal Report which considers transportation matters under the criteria to *“encourage active and sustainable travel”*. Key considerations that relate to this include:

“There is a common goal to reduce traffic emissions and congestion which means reducing single-occupancy car use and increasing other forms of transport, especially at peak times. The location of housing and key services can facilitate better access to public transport. Opportunities for active travel makes travel more affordable and may bring added health benefits while also reducing greenhouse gas emissions. Measures to manage car demand, such as parking and re-allocation of roadspace, which encourage a shift from car to public transport, walking or cycling will contribute to this goal.”

3.84 The West Lisburn/Blaris strategic site is identified as being *“significantly positive”* in respect of this metric. This means that the proposal *“would greatly help to achieve the objective”*.

Local Transport Plan

3.85 The Department for Infrastructure issued guidance on preparation of LDP policies for transport in February 2019. This emphasised the role that LDPs and Transport Plans have in *“facilitating*

²³ SP01 West Lisburn/Blaris; SP02 Purdysburn/Knockbracken; SMU01 Sprucefield Regional Shopping Centre

the integration of transportation and land use planning” (Technical Summary 8 paragraph 3.2) and Council policies are required to take account of the relevant transport strategies and plans.

3.86 A Local Transport Study has been prepared for the LCCC area by the Department for Infrastructure. Although this remains in draft form, it includes the following note at the start of the introduction:

“Note: This Study is part of the Belfast Metropolitan Transport Plan Local Transport Study (BMTS). The BMTS has yet to be completed and therefore this study is provided in draft form. It will remain as a draft until the BMTS is finalised and until then it is subject to change. The Department has agreed that the Lisburn and Castlereagh City Council (LCCC) may use the Draft LCCC LTS as a technical supplement to the LCCC LDP Plan Strategy.”

3.87 The Local Transport Study notes the importance of ensuring that transport investment is fully aligned with the Growth Strategy set out by LCCC and emphasises the importance of locating development in areas that have good accessibility. Paragraph 6.2.6 refers specifically to Lisburn City, Castlereagh Greater Urban Area, Moira, Carryduff and Hillsborough in this regard. As detailed above, over 85% of the proposed growth is located in these main urban areas.

3.88 Paragraph 6.2.7 of the Local Transport Study states that *“in finalising planning permission for all new development it will remain a requirement to ensure the provision of safe transport infrastructure for all users.”* To this end, Part 2 of the Plan Strategy (Operational Policies) includes a number of detailed policies relating to transport matters under the theme of a Connected Place. These policies, which will be taken into account in the determination of planning applications, relate to a broad range of transport issues, including:

- 1 TRA1: Creating an accessible environment – setting out a range of measures that are to be taken into account in the external layout of all development;
- 2 TRA2: Access to public roads – planning permission will only be granted for a development proposal involving direct access, or the intensification of the use of an existing access, onto a public route where it will not prejudice the road safety or significantly inconvenience the flow of vehicles and where it does not conflict with Policy TRA3;
- 3 TRA3: Access to protected routes – LCCC will restrict the number of new accesses and control the level of use of existing access onto Protected Routes;
- 4 TRA4: Protection for new transport schemes – planning permission will not be granted for development that would prejudice the implementation of a transport scheme identified in the LDP;
- 5 TRA5: Strategic greenways and disused transport routes – planning permission will not be granted for development that would prejudice Strategic Greenways or the future reuse of a disused transport route identified in the LDP for transport or recreational purposes;
- 6 TRA6 – where appropriate, LCCC will require developers to submit a Transport Assessment to allow the transportation implications of development to be properly evaluated;
- 7 TRA7 – development proposals will provide adequate provision for car parking and appropriate service arrangement;
- 8 TRA8 – planning permission will only be granted where public transport, walking and cycling provision forms part of the development proposal (active travel);
- 9 TRA9 – planning permission will be granted for new, or an extension to existing Park and Ride/Park and Share car park, where they meet the identified need agreed by the Department; and,

10 TRA10 – planning permission will be granted for public or private car parks which provide a high standard of design, layout and landscaping, subject to a number of detailed criteria.

3.89 The Local Transport Study also provides detail of the alignment between its objectives and those of other polices, including the LCCC Community Plan and the LDP Preferred Options Paper, which reflected the stage that the LDP had reached at the time of preparation of the draft LTS. This demonstrates the importance that LCCC places on the integration of land use and transport planning whilst the detailed policies that are contained in Part 2 of the Plan Strategy (and summarised above) will ensure that transportation matters will be fully assessed prior to the granting of planning permission.

Delivery of specific transport proposals

3.90 LCCC has worked closely with the Department for Infrastructure. This underlines the shared recognition of both organisations regarding the need to progress the LDP and the Local Transport Study and to ensure that there is a high degree of complementarity between the two plans, even though they serve different purposes.

3.91 Despite still being in draft form, the Local Transport Study provides a detailed assessment of transportation issues and options, sets out objectives, and identifies a series of measures for delivery over the period to 2032 in order to ensure that the transport network and transport needs of LCCC are adequately considered and addressed in planning for future development. The work that has been undertaken to date provides the evidence that is required to inform the strategic considerations in the Plan Strategy.

3.92 It is understood that confirmed transport schemes will not be identified until the LPP stage. These will be informed by continued monitoring of transport schemes (which is required by the Monitoring Framework of the Plan Strategy), including:

- 1 Delivery of identified transport schemes, including the Knockmore rail halt and the number of new Park and Ride/Share schemes or extensions to existing facilities;
- 2 Active Travel schemes which provide improved linkages – this will focus on the commencement of schemes that support Active Travel and the extent to which a modal shift to walking, cycling or public transport is achieved; and,
- 3 The protection of Strategic Greenways and the reuse of disused Transport Routes.

3.93 The monitoring of these metrics will help to identify needs, problems and opportunities and thereby inform solutions that can be implemented through the LPP, recognising that this would be the appropriate forum in which to consider and address such detailed proposals. The fact that detailed schemes are not yet known should in no way undermine progress of work on the Plan Strategy or its robustness.

3.94 In respect of the identified transport schemes, it should be noted that no government funding has been identified for the M1-Knockmore link road and so this is identified as a developer-led scheme. As referred to previously, this is subject to a current planning application. Its implementation is not anticipated to represent a major risk to the delivery of housing in this location. The delivery of other major infrastructure schemes, such as the Knockmore rail halt and the strategic park and ride facilities will be the responsibility of the Department for Infrastructure. The Council continues to engage with the Department in bringing forward these strategic schemes as part of the ‘new’ Belfast Metropolitan Transport Plan.

Affordable housing

- 3.95 Policy HOU10 of the draft Plan Strategy Part 2 (Operational Policies) sets out the affordable housing requirement for a minimum of 20% affordable housing provision on sites of more than 0.5ha or comprising of 5 residential unit or more.
- 3.96 This policy contributes towards the objective of the RDS 2035 to manage housing growth and “ensure an adequate and available supply of quality housing to meet the needs of everyone.” The RDS 2035 recognises that the housing needs of the community are varied and notes that this includes the availability of affordable and special needs housing.
- 3.97 The RDS 2035 states that, in preparing development plans, Planning Authorities should take account of the Housing Needs Assessment/Housing Market Analysis that is prepared by the Northern Ireland Housing Executive (NIHE)²⁴. Such assessments include an assessment of the need for affordable and intermediate housing.
- 3.98 The SPPS underlines the importance of the evidence prepared by the NIHE to inform the affordable housing policies contained within emerging development plans.

Assessing the affordable housing need

- 3.99 Drawing on the evidence prepared by the NIHE, the draft Plan Strategy for Lisburn and Castlereagh notes that:
- 1 The projected social housing need for the district is 800 units between 2017 and 2022;
 - 2 Extrapolating this figure over the Plan period to 2032 equates to an estimated figure of approximately 2,400 social housing units (160dpa);
 - 3 An additional need is also identified for 1,920 intermediate housing units over the Plan period (128dpa); and,
 - 4 This equates to a total affordable housing requirement of 4,320 units over the Plan period (288dpa).
- 3.100 The total affordable housing requirement represents 35% of the total housing requirement of 825dpa (including the flexibility margin).
- 3.101 The draft Plan Strategy notes that the deliverability of affordable housing will depend on new zonings, urban capacity sites and windfalls. This is because existing commitments are not expected to include any affordable housing provision. Given the extent to which existing commitments are expected to contribute to the total housing need over the LDP period, this places a reliance on the emerging sites to contribute towards the identified affordable housing needs.
- 3.102 The 2019-2023 Housing Investment Plan identifies an emerging supply of 1,128 social housing units, as summarised below:

Table 3.11 Supply of affordable housing in Lisburn and Castlereagh

Source	No. units
Completed 2018-19	81
On site 2018-19	351
Programmed	696
Total	1,128

²⁴ The NIHE is the Statutory Housing Authority in Northern Ireland and a consultation body as defined in the Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

Source: NIHE, 2019-2023 Housing Investment Plan

3.103 This leaves a residual requirement for 1,272 social units – a total of 3,192 affordable (social and intermediate) units.

3.104 In order to meet this requirement, LCCC considered three affordable housing requirement scenarios (10%, 15%, 20%) with different site thresholds (7 and 10 units as minimum site for affordable housing contribution). This was based on an analysis of the total completions between 2015/16 and 2017/18

Table 3.12 Estimated affordable housing delivery under alternative policy scenarios²⁵

Minimum site size	Total number of residential units approved	Affordable housing requirement		
		20%	15%	10%
10 units	700	134	97	63
7 units	722	136	99	63

Source: LCCC

3.105 This shows a significant shortfall against the affordable housing requirement for 288dpa. The fact that these figures are based on all houses delivered (over the relevant thresholds) but Policy HOU10 will only relate to sites that do not currently benefit from planning permission means that the shortfall will be even more significant. Through consultation with the NIHE it was determined that none of these percentage scenarios provided sufficient yield to be considered as reasonable alternatives. As such, these were not included within the draft Sustainability Appraisal for Policy HOU10.

3.106 The NIHE indicated that its preferred approach was to provide a percentage-led approach to the provision of affordable housing on all major residential development sites as follows:

- 1 Development Management Policy can set a proportion of affordable housing on sites meeting a certain size threshold;
- 2 An Allocations Policy can set key site requirements and zone land for affordable housing.

3.107 The approach adopted in Policy HOU10 of the draft Plan Strategy reflects the approach set out in (1) above. Further analysis was undertaken in respect of sites of more than 5 units, considering the implications of a 10% and 20% affordable housing contribution based on delivery between 2014/15 and 2018/19, as follows:

Table 3.13 Estimated affordable housing delivery on sites of more than 5 dwellings under 10% and 20% policy scenarios

Year	Total number of residential units approved (over 5)	Number of units delivered if 20% affordable is applied	Number of units delivered if 10% affordable is applied
2014/15	514	97	42
2015/16	433	81	34
2016/17	1,012	193	88
2017/18	815	153	69
2018/19	801	154	73
Total	3,575	678	306
Average	715	136	61

²⁵ It should be noted that the affordable housing figures are based on the sum of all individual applications, rather than constituting 10%/15%/20% of the total number of units approved. As such, the figures will not necessarily represent 10%/15%/20% of the total because of the effect of rounding individual schemes to the nearest number of affordable units.

Source: LCCC

- 3.108 It should be noted that if the same three-year period that informed the analysis in Table 3.12 was applied (i.e. 2015/16-2017/18), the average figures would be 64dpa for 10% and 142dpa for 20%.
- 3.109 If taken over the Plan period this would equate to the following levels of affordable housing delivery:
- 1 20% affordable would provide between 2,040 and 2,130 units²⁶; and,
 - 2 10% affordable would provide between 915 and 960 units²⁷.
- 3.110 As set out above, Policy HOU10 will only apply to those sites that do not currently benefit from planning permission and so the expected level of affordable housing delivery will be materially lower than this estimate, resulting in a continued shortfall against the affordable housing requirement. The figure for undeveloped which is currently zoned but has no live planning permissions – and to which the affordable housing requirement could be applied – is set out below:

Table 3.14 Potential affordable housing delivery from remaining units

Settlement	Potential Units Remaining (Undeveloped)
Lisburn City	69
Lisburn Greater Urban Area	0
Castlereagh Greater Urban Area-Newtownbreda/Cairnshill Area	360
Castlereagh Greater Urban Area- Dundonald	0
Carryduff	410
Hillsborough/Culcavy	0
Moira	269
Total potential units remaining	2,608
Total if 20% delivered as affordable	521 units
Total if 10% delivered as affordable	260 units

Source: LCCC

- 3.111 Applying a 20% affordable housing requirement to this figure would result in the delivery of 521 affordable dwellings. In addition:
- 1 The West Lisburn/Blaris site is expected to deliver circa 130 affordable dwellings;
 - 2 All but one of the urban capacity sites are expected to accommodate more than five units. Applying a 20% affordable housing requirement to the estimated yield from this source would result in the delivery of between 162²⁸ and 180²⁹ affordable homes; and,
 - 3 The 20% affordable housing requirement would apply to windfall sites with a capacity for more than five dwellings. Table 3.5 shows that 963 units are expected to come forward on larger windfall sites, so a supply of 193 affordable dwellings can be estimated from this source – although the precise supply will depend on the size profile of the individual sites that make up this total.

²⁶ Based on an annualised delivery of 136 or 142dpa multiplied by the 15 year Plan period.

²⁷ Based on an annualised delivery of 61 or 64dpa multiplied by the 15 year Plan period.

²⁸ Figure based on the discounted yield from urban capacity sites: $811 - 3 = 808 \times 20\% = 162$.

²⁹ Figure based on the full yield from urban capacity sites: $901 - 3 = 898 \times 20\% = 180$.

- 3.112 This would result in a total of 1,006-1,024 affordable dwellings over the remainder of the LDP period. When set against the known supply of 1,128 units as detailed in Table 3.11, this results in a total delivery of 2,134-2,152 affordable dwellings in LCCC over the LDP period (plus delivery from windfall sites). This represents c.50% of the total affordable housing requirement.
- 3.113 In order to reduce this shortfall, an allocations policy setting out key site requirements and the zoning of land for affordable housing may come forward through the Local Policies Plan, once designations are made.

Justification of thresholds

- 3.114 Major development as defined in the Planning (Development Management) Regulations (Northern Ireland) 2015 defines major residential development as being on sites more than 50 units or 2 ha in size. Having established that the majority of applications fall substantially under this threshold, it was considered that the only feasible option was to opt for the percentage providing the highest yield and to apply this to applications under the major development threshold identified. As set out below, our analysis of a number of development plans in England and Wales has identified a varied approach to affordable housing requirements and site thresholds, based on local circumstances and requirements. It is certainly not the case that an affordable housing threshold of 50 units is “widely used in England”, and even if it was, LCCC has demonstrated why such an approach would not be appropriate in the local context.

Table 3.15 Review of affordable housing requirements in case study authorities

Local Authority	% of Affordable Housing	Site Threshold
East Hampshire	35%-40% depending on location	1
Pembrokeshire	10%-50% depending on location	1
Swansea	10%-50% depending on location	2/6 depending on location
Hambleton	40%-50% depending on location	2/15 depending on location
Neath Port Talbot	10%-25% depending on location	3
Monmouthshire	25%-35% depending on location	3/4/5 depending on location
Newport	10%-40% depending on location	3/10 depending on location
Caerphilly	10%-40%, depending on location	5
Cardiff	Brownfield: 20%; greenfield: 30%	5
Elmbridge	20%-50% depending on location and site size	5
Powys	0%-30% depending on location	5
Rother	30%-40% depending on location	5/10/15 depending on location
Carlisle	20%-30% depending on location	6/11 depending on location
Stratford-on-Avon	35%	6/11 depending on size of dwellings
Blaenau Gwent	10%	10
Burnley	Site specific requirement	10
Kirklees	20%	10
Merthyr Tydfil	5%-10% depending on location	10
Wyre	0%-30% depending on location	10
Cotswolds	Brownfield: 30%; greenfield: 40%	11
Melton	15%-40% depending on location	11
Telford and Wrekin	25%-35% depending on location	11

Dover	30%	15
Ipswich	15%	15
Reigate and Banstead	30%	15

Source: Lichfields analysis

- 3.115 Although not intended to be a comprehensive sample of all authorities in England and Wales, it is evident that all 25 authorities detailed in Table 3.15 sought an affordable housing requirement from residential developments that were considerably smaller than the 50 units that are defined in Northern Ireland regulations as constituting “*major development*”. There will have been local factors that have influenced the threshold figure for each authority, but it is noted that the average of the 25 authorities is 8 units. When viewed in this context, it is apparent that the figure of 5 units that has been applied by LCCC is by no means exceptionally low. In the light of this and given the evidence that exists to justify the approach that has been taken in setting this figure, it is considered to be entirely reasonable.
- 3.116 As to the affordable housing requirement, only three authorities detailed in Table 3.15 have percentage requirement figures that are below 20% for the whole of the authority area (i.e. lower than that proposed by LCCC), whilst one authority (Kirklees) had the same requirement. Two of these authorities – Blaenau Gwent and Merthyr Tydfil – have a much weaker housing market than Lisburn and Castlereagh. The housing market in Kirklees is broadly similar to Lisburn and Castlereagh (with average house prices 5.3% lower than Lisburn and Castlereagh but the affordability ratio 5.4% higher). Ipswich displays a stronger market. This is important in highlighting that the strength of the market is not the only factor that affects the level of affordable housing requirement that is appropriate, viable and deliverable.

Table 3.16 Housing market strength in comparator local authority areas (2017 data)

Local authority	Median house prices	Ratio of median house prices to median income
Blaenau Gwent	£83,000	3.39
Merthyr Tydfil	£95,000	4.14
Kirklees	£141,000	5.69
Ipswich	£182,000	6.74
LCCC	£148,900	5.4

Source: Oxford Economics Socio-Economic profile of LCCC / ONS Ratio of house price to workplace-based earnings / Lichfields analysis

- 3.117 This evidence shows that the affordable housing level that has been set for Lisburn and Castlereagh is realistic and will not undermine viability of development or delivery of housing, even though it is not sufficient to meet the identified level of affordable housing need in full. As stated previously this is largely due to the legacy situation inherited from BMAP, and the fact that there has been no previous policy in Northern Ireland to address this issue³⁰, such that existing commitments are not required to make any affordable housing contribution.
- 3.118 The consultation draft of PPS22 proposed a single affordable target for the whole of Northern Ireland. Paragraph 2.8 stated:

“The draft paper seeks views on a regional target (e.g. 20%) of housing developments of 5 units or more to be provided by the developer as affordable housing (and / or a commuted monetary sum), to be determined on need as assessed by the Northern Ireland Housing Executive (NIHE).”

³⁰ PPS22 Affordable Housing published as a draft consultation paper in 2014 but was never formally adopted

3.119 Paragraph 4.2 of draft PPS22 explained the origins of the policy:

“The purpose of this PPS is to provide the planning policy mechanism for securing development contributions through the development management process in line with the [Department for Social Development’s] DSD’s ‘Developer Contributions for Affordable Housing’ draft policy.”³¹

3.120 A subsequent report on the outcome of the DSD consultation was prepared by Three Dragons and published in December 2015. This concluded at paragraph 36 that:

“introducing a developer contribution scheme with a single percentage of affordable housing across Northern Ireland will not work given current market conditions. In Belfast and its environs a scheme could be considered but the timing, percentage target and form of provision (e.g. units on site versus land) is best left to local decision makers working through the local development plan process – where targets, delivery mechanisms and issues of tenure versus community ‘mixing’ can be fully debated. There is a continuing role for grant to support mixed tenure development.” (Lichfields emphasis).

3.121 The report made a number of recommendations that provide further context to the approach that has been taken by LCCC in setting its affordable housing requirement. These include:

- 1 Targets and delivery mechanisms for a developer contribution scheme should be set locally as part of the local development plan process (Recommendation 39);
- 2 Whilst the report indicated that *“a target of 0% will be justified in most parts of Northern Ireland at the present time”*, it recognised that *“in some places, a limited contribution to affordable housing should be possible without impacting on the recovery of the market”* (Recommendation 39); and,
- 3 *“Thresholds for developer contributions are valid and should form part of a locally defined policy. However, regional guidance can prescribe a standard threshold leaving LDPs to vary from this if there is local evidence to justify it. The 5 dwelling threshold previously consulted on seems a realistic starting point”* (Recommendation 40).

3.122 In response to these points:

- 1 LCCC recognises that it is critically important to make provision for the delivery of affordable housing through the emerging LDP;
- 2 However, it appreciates that the quantum of affordable housing that can be delivered is constrained by the fact that existing commitments are not expected to make any contribution;
- 3 The need for affordable housing, together with the strength of the local market means that a target of 0% is not considered to be justified;
- 4 LCCC recognises its role within the wider Belfast Metropolitan Area, within which the pressure for affordable housing is acute, and has sought to achieve a balance between the need for affordable housing delivery and the importance of ensuring that this does not undermine the viability of open-market housing; and,
- 5 In accordance with the recommendation made by Three Dragons, the minimum site threshold of five units reflects a balance between the size profile of applications that are submitted to LCCC and the cost/viability issues associated with very small schemes.

³¹ The Department for Social Development’s draft consultation paper, *Developer Contributions for Affordable Housing*, was published in June 2014 and sought views on a regional target for affordable housing provision.

- 3.123 Whilst recognising that the affordable housing target set out in Policy HOU10 will not meet the identified need in full, it is considered to represent a sound basis by which this important component of future housing supply can be delivered.
- 3.124 It should also be noted that, in many cases, the affordable housing requirements contained within development plans in England and Wales are insufficient to meet the affordable housing requirement in full. This is because viability constraints prevent a higher proportion of affordable housing being sought, whilst the methodology that is used to assess affordable housing needs can result in a figure that would necessitate a very high overall housing requirement if it were to be met in full. This point was recognised by Dove J in *Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government and Elm Park Holdings Ltd*³²:
- “The Framework makes clear that these [affordable housing] needs should be addressed in determining the FOAN [full objectively assessed housing need], but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAN. This is no doubt because in practice very often the calculations of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. That is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being developed.*
- “this consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 150 of the Framework requiring that the SHMA “addresses” these needs in determining the FOAN.”*
- 3.125 It follows from this that there will be situations in England (and Wales) in which the combination of the overall quantum of housing and the affordable housing policies contained within the development plan will not address the identified affordable housing need in full. However, that does not take away from the importance of, or need for policies that seek to maximise the provision of affordable housing delivery.
- 3.126 It is recognised by LCCC that the implementation of Policy HOU10 is dependent on the viability of individual development sites and that there may be circumstances in which the level of affordable housing provision that is anticipated by Policy HOU10 will not be deliverable. In such cases, it will be incumbent on the applicant to provide evidence to demonstrate why a policy-compliant level of affordable housing provision cannot be achieved and LCCC will need to determine the application in the light of this evidence.
- 3.127 LCCC recognises the considerable importance of affordable housing and has followed the approach set out in the RDS 2035 and SPPS. However, the very high reliance on existing committed sites to contribute towards future housing delivery does impact on the ability to meet all the affordable housing need that has been identified by NIHE. This is an issue that is common to all local government districts in Northern Ireland and NIHE recognises this to be the case. Over time, the legacy sites will be developed, and it will be possible to increase affordable housing delivery.
- 3.128 LCCC will continue to monitor the delivery of affordable housing and will consider whether additional provision could come forward through the Local Policies Plan, if required.

³² EWHC 2464 (Admin) 9 July 2015

Response from NIHE

3.129

LCCC has worked very closely with NIHE which supports the approach set out in the draft Plan Strategy. Its response to Policy HOU10 states:

“We strongly support the affordable housing policy which meets the aims of the RDS, SPPS, and the LDP of providing a mix of tenures, to meet need and to create cohesive and balanced communities.

“We support the threshold of five or more dwelling units, or on a site of 0.5 hectares, or more and the proportion of a minimum 20% requirement of the housing units to be affordable housing. We believe this will address affordable housing need. As there is a high level of committed housing sites, we believe that the five unit threshold is appropriate to maximise the number of sites to which the policy can be applied.

“We support the delivery of affordable housing being secured by a Section 76 planning agreement. A planning agreement can include more detail, better ensuring the units are compliant with policy.

...

“This will also mean that windfall sites will contribute to meeting housing need and mixed tenure development. We believe mixed tenure development leads to more inclusive neighbourhoods and avoids area based deprivation.

“We support the criteria that by exception affordable housing may be permitted on open space. We recognise that in some circumstances, the selective redevelopment of portions of open space, particularly within large estates, can deliver positive effects in terms of estate restructuring, reductions in anti-social behaviour and meeting high levels of housing need. The Housing Executive supports the general presumption against the loss of open space to competing land uses, except where it is clearly shown that redevelopment will bring substantial community benefits that decisively outweigh the loss of the open space. We welcome the recognition that the provision of affordable housing is an example of a substantial community benefit.

...

“We welcome that it is stated that the Housing Executive has a role in the identification of need and the applicant is advised to liaise closely with a Housing Association to discuss the affordable housing requirement.

“We support the statement that affordable housing will be provided as part of the Local Policies Plan. We would like the opportunity, in some instances to adjust, or increase the proportion of affordable housing through a key site requirement within the LPP, which will be important in areas where there is an acute housing need.”

4.0 West Lisburn/Blaris Strategic Site

- 4.1 The draft Plan Strategy proposes the development of the c.100ha West Lisburn/Blaris site for mixed use development, comprising a mix of employment uses (Use Class B1, B2, B3 and B4) on approximately 52ha of the site, together with housing (c.1,500 dwellings) and a range of small scale local needs convenience retailing and healthcare facilities on the remainder of the site. This mix of uses reflects that set out in the West Lisburn Development Framework (2018 Review) but differs from the designation in the Belfast Metropolitan Area Plan (BMAP). However, following the 2017 Court of Appeal judgment which found that the decision of the then Environment Minister to direct adoption of the BMAP was unlawful and that the purported adoption therefore had no force or effect, it remains unadopted and its zoning of 119.48ha of land at West Lisburn/Blaris for employment development, together with hotel and ancillary leisure facilities, a school, healthcare facilities, car showrooms, small scale retail development and open space should be viewed in this context.
- 4.2 The BMAP zoning, the West Lisburn Development Framework and the draft Plan Strategy all anticipate that the development of the West Lisburn/Blaris site will facilitate the delivery of the M1-Knockmore link road. This 1.6km route would provide a connection between the M1/A101 roundabout and the existing Moira/Knockmore Road junction. It has been presented as a “missing link” in the city’s transport infrastructure which would connect the M1 east-west corridor and the A1 north-south corridor with the wider Lisburn conurbation and enable orbital traffic movements to be undertaken around Lisburn. It would also provide an alternative key route into Belfast. The M1-Knockmore link is identified in the Belfast Metropolitan Transport Plan (2004) as one of two proposed non-strategic highway schemes that are to come forward in Lisburn. However, the implementation of this route was to be developer-led. As the Department’s priority for funding is to be concentrated on the construction of major capital schemes on the strategic highway, the M1-Knockmore link was to be funded in full or very substantial part by the private sector. The cost of this link has been estimated at £13 million.
- 4.3 Neither the West Lisburn/Blaris site or the M1-Knockmore link have come forward for development, although planning applications have been submitted in respect of both^{33,34}. The planning application for the West Lisburn/Blaris site reflects the scheme that is proposed by the Development Framework and the draft Plan Strategy.

Justification for reduced quantum of employment

- 4.4 The zoning that is proposed in the draft Plan Strategy comprises of approximately half the quantum of employment-related development that was historically contained in the BMAP. This change in the scale of the proposed development is evidenced in this section.
- 4.5 The BMAP identified a significant requirement for employment land, including 439ha in Lisburn City and 222ha for Castlereagh, equating to a total requirement for 596ha of employment land in the former Lisburn City and Castlereagh local government districts.
- 4.6 Taking account of a number of different scenarios, the 2019 Employment Land Review (ELR) that was prepared by Lichfields on behalf of Lisburn and Castlereagh Council identified a substantially lower requirement for employment land – equating to between 12.6ha and 44.8ha across the Plan period from 2017 to 2032. Of the six scenarios/sensitivities that were tested by

³³ West Lisburn/Blaris mixed use development: LA05/2018/1154/O - Proposed mixed use development to include new housing (1300 dwellings) and commercial floor space (754,000 sq.ft.)1.6km M1-Knockmore link road, riverside parkland and ancillary works.

³⁴ M1-Knockmore link road: LA05/2018/1155/F - Construction of a new link road (1.6km) connecting the existing M1 junction 8/A101 roundabout to existing Moira/Knockmore Road Junction

the ELR, the draft Plan Strategy states that “*Scenario 5: Past Completions is considered the most appropriate as it builds upon the quantifiable completion figures of previous years and is therefore the most likely forecast outcome for the council area.*” This equates to a requirement for 44.8ha over the Plan period and is just 7.5% of the total required identified in the BMAP. Whilst the geographical scale of the LCCC area is smaller than the combined area of the former Lisburn City and Castlereagh Council areas, the difference is not so significant to account for this substantial reduction in future employment land requirements.

- 4.7 This significantly reduced employment land requirement will have major implications on the need for land to be zoned for employment purposes and the expected rate of delivery of employment development.
- 4.8 The ELR noted that 579.7ha land has been zoned for employment development in LCCC. Of this figure, 304.3ha has been developed, leaving 275.4ha remaining (of which just 14.1ha has planning permission). This is more than six times the identified requirement for the emerging Plan period.
- 4.9 The ELR assessed the West Lisburn/Blaris site as “poor”. This was due to:
- 1 Poor access, with the scheme reliant on the M1-Knockmore link, a lack of public transport facilities close to the site, and no existing pedestrian/cycle routes serving the site;
 - 2 Distance from existing residential areas and community facilities;
 - 3 Proximity to infrastructure; and,
 - 4 Its greenfield status.
- 4.10 The ELR recognised that the proposed M1-Knockmore link road is critical to unlocking the site and for its delivery. It accepted that pedestrian, cycle and public transport links could be provided as part of future development, with public transport links being facilitated by the proposed link road. Despite its current poor scoring and limited connectivity, the ELR noted that the site could become a “*prime location*” for access to the M1 and A3. It also concluded that:
- “The site could be suitable for a range of uses, and owing to its size, could support mixed use development as well as employment land uses.”* (ELR page 73).
- 4.11 A mixed use development would significantly improve the rating of the site in respect of distance to residential areas and community facilities and proximity to infrastructure. This, together with the delivery of the M1-Knockmore link could increase the score of the site from 23 to 33, making it the highest scoring of all 20 assessed by the ELR.

Table 4.1 Current and potential ELR score for West Lisburn/Blaris Road site, assuming mixed use development and delivery of M1-Knockmore link

	Overall score	Access			Site context				Environment				Market strength
		Road access	Public transport access	Pedestrian / cycle access	Proximity to residential areas / community facilities	Brownfield / greenfield	Adjoining uses	Proximity to infrastructure	Landscape / environmental designations	TPOs	Topography	Flood risk	
Current score	23	1	1	1	1	1	3	1	2	3	3	3	3
Potential score	33	3	3	3	3	1	3	3	2	3	3	3	3

Source: Lichfields analysis

- 4.12 Designation of the West Lisburn/Blaris zoning for mixed use development would reduce the supply of available employment land to c.220ha. The draft Plan Strategy employment requirement figure equates to just 20% of this level of land availability.
- 4.13 Analysis undertaken by Oxford Econometrics (OE)³⁵, on behalf of LCCC, has identified the potential of the West Lisburn/Blaris mixed use development to support the creation of 3,500 employment-class jobs. Section 5.2.1 of the OE report states “*we also assume that the development will be fully built out by 2028, with jobs generated in equal increments over a ten-year period.*” Based on experience from elsewhere in the UK, we consider this to be a reasonable assumption in respect of the likely build period. The planning application submitted for the development of this site remains undetermined and work has not yet commenced on site. Taking account of the planning status, likely lead-in times and the expected construction period, we do not anticipate that the site could be fully built out by 2028. It is furthermore uncertain whether all of the jobs could come forward within the current Plan period. However, the level of employment identified by the OE report does represent a significant proportion of the B Class employment growth forecasts identified in the ELR (1,100 – 3,750). In addition, OE forecast that the additional spending by new residents will generate 1,300 jobs across the LCCC area together with a further 1,600 indirect and induced jobs. Whilst many of these jobs will follow occupation of the new homes, this analysis does point to the significant economic contribution of this scale of development. It also reduces any argument regarding the need for all of the site to be zoned for employment purposes.
- 4.14 The implication is that not all of the West Lisburn/Blaris site is needed for employment development over the emerging Plan period. Moreover, there is a significant risk that maintaining the BMAP allocation – an area of land effectively double the size of the existing Knockmore Road employment areas – would result in the site remaining vacant.

Cross-subsidy of M1-Knockmore link road

- 4.15 The fact that employment development has not been forthcoming at West Lisburn and the M1-Knockmore link remains unimplemented is fundamental to the case for its redesignation for mixed use purposes. The previous section has shown that there is no longer a need for all of the site to be zoned for employment purposes. Test of Soundness CE2 requires the strategy, policies and allocations to be realistic, whilst Test CE3 requires clear mechanisms for implementation.

³⁵ Socio-economic profile and forecast of Lisburn and Castlereagh (September 2018)

Zoning land for a use that is not likely to come forward for development would not be in accordance with these tests.

- 4.16 The key consideration should therefore be how to ensure that this site could come forward for beneficial development, including employment uses. Central to this is how to ensure that the M1-Knockmore link could be delivered to unlock the site. The release of part of the site for housing will be critical in this regard.
- 4.17 The values generated by residential development are substantially higher than those associated with employment-related development. As such, residential development is much more likely to be able to generate the value required to fund the link road and thereby unlock this site for development. In order to evidence this point, we have reviewed analysis undertaken by *Planning Resource* in relation to the Community Infrastructure Levy (CIL) charges implemented in respect of residential and commercial (B Class employment uses) development in 239 local authorities in England and Wales, plus London. All of these authorities applied a CIL charge for residential development but only 55 (21%) applied a charge for employment development. Just 27 charging schedules (11%) applied CIL to all forms of employment development, with 21 (8%) applying CIL for offices only and 6 (2%) applying CIL to industrial and/or warehouse developments.
- 4.18 In nine charging schedules (3.4% of all charging schedules in England and Wales), the amount of CIL payable for employment development (in the most expensive zone) is more than the CIL payable in at least one (generally the cheapest) residential zone. However, there are no cases in which the CIL payable for all forms of commercial development in all parts of the local authority area is higher than the CIL payable for residential development across the area. In all other cases, the CIL rate for residential development was higher than for employment development.

Table 4.2 Review of CIL charges for residential and employment development

No. charging schedules reviewed	No. applying CIL for residential development	No. applying CIL for employment development	No. for which residential CIL > employment CIL
263 (239 LPAs plus London ³⁶ and 20 CIL reviews)	263 (100%)	55 (21%) (28 relating to all employment development, 21 relating to offices only, 4 relating to warehouses and 2 relating to industry and warehouses)	All but nine charging schedules for which the CIL payable in one employment was higher than the CIL payable in at least one residential zone. In no cases was the employment CIL higher than residential CIL in all charging zones.

Source: Planning Resource, updated 20 September 2020 / Lichfields analysis

- 4.19 In setting charging schedules, local authorities are required to have regard to the cost of the infrastructure that is required, the availability of other sources of funding, and the viability of development. The relative difference in the levy that is applied in respect of different land uses is a function of the viability of development. Therefore, the fact that higher rates are applied consistently in relation to residential development is testimony to the fact that this generates higher values and can support a greater level of infrastructure cost.

³⁶ London Legacy Development Corporation CIL, London Legacy Development Corporation CIL (Revised), London Mayoral Crossrail CIL, London Mayoral Crossrail CIL 2

- 4.20 Based on the assumption that the West Lisburn/Blaris site could accommodate 1,500 dwellings and the £13m link road is to be funded entirely by the private sector, this cost would equate to £8,666 per dwelling. Assuming an average house size of c.85-95sqm would result in a cost of c.£91-£102/sqm. This would be well within the range identified by the typical CIL charge for residential development in England and Wales. Under this scenario, the employment floorspace would not be required to provide any subsidy for the link road. However, it does represent a significant contribution per dwelling for a single item and may impact on the level of other planning obligations that could be supported by the site.
- 4.21 By contrast, assuming that an employment-only solution could accommodate c.150,000sqm employment floorspace³⁷, the link road would equate to a cost of £87/sqm. This is considerably higher than the range identified by the typical CIL charge for residential development in England and Wales. The average charge for commercial development is £35-£40/sqm per charging zone, although this figure relates only to those authorities within which commercial development was found to be sufficiently viable to sustain a CIL charge. As set out above, in the vast majority of cases, the value of commercial development is insufficient to justify a CIL charge.
- 4.22 In addition to considering the comparative value of residential and commercial development, the ability to support the delivery of the M1-Knockmore link road is also a function of development take up rates and the ability to commit to major capital expenditure. Given the strength of the housing market in West Lisburn, it is reasonable to assume that there will be a steady build out rate so providing the necessary confidence to fund the road ahead of or in parallel with development. By contrast, there is much less certainty about the rate of take up of employment land which could remain vacant for a number of years. The fact that employment units are typically built for rent rather than sale also adds to the difficulty in realising the short-term income to fund major advance infrastructure. Even if employment units were built for sale it is highly unlikely that the road could be funded just by early occupiers, but full take up would be dependent on the road being in place, creating a strong barrier to delivery.
- 4.23 Invest NI, Department of Economy, are the Regional Economic Development Agency for Northern Ireland and act as a funding provider to attract significant inward investment in Northern Ireland. Despite their support for retaining the policy position in relation to employment use on the site, they have not identified West Lisburn/Blaris as one which would be added to their portfolio of serviced sites, or benefit from any direct investment. This is in spite of the status afforded to it under the RDS 2035³⁸ and BMAP. This lack of investment from Central Government indicates the further pressures placed on potential private sector investment to develop the site.
- 4.24 There are many examples of residential development cross-subsidising other beneficial uses that would not otherwise be deliverable. This is distinct from “enabling development” which relates to development that would not be in compliance with local and/or national policies and would not normally be granted planning permission, except for the fact that it would secure the future conservation of a heritage asset. In many cases, development that would be appropriate and beneficial in its own right has the potential to generate sufficient value to leverage wider benefits.
- 4.25 An example of this can be seen at the Croda Site, Wirral. This is a mixed use commercial (Use Classes B1, B2 and B8) and residential development with associated open space, internal road layout, footpaths and cycle routes, river restoration scheme together with associated

³⁷ This figure is approximately double the 754,000sqft (70,048sqm) employment floorspace that is proposed in the current planning application for mixed use development at West Lisburn/Blaris (LA05/2018/1154/O).

³⁸ RDS 2035 SFG1 para 3.41

infrastructure and demolition. The focus of this development proposal was the regeneration of the site to provide modern employment land suitable to modern business requirements. The majority of recent employment development had relied on public sector gap funding to secure land remediation and infrastructure. Due to current economic conditions, this was no longer available and it was demonstrated that a mixed use development could fill the financial gap created by waning public sector granted provision. The mixed use development was shown to contribute towards the regional and local economic strategies. The development would promote economic development, maximise employment potential, help to address worklessness, and expand the quality and choice of housing in accordance with local and regional economic priorities.

- 4.26 There are obvious parallels between Croda and West Lisburn/Blaris. In particular, the cessation of public sector funding at Croda resulted in the need for mixed use development to generate sufficient value to ensure the viability of the development. As set out above, no public sector support is available to fill the funding gap that exists in respect of the link road under the 100% employment scheme at West Lisburn/Blaris. In this context, a residential-led mixed use scheme would play an important role in generating the value required to support this major infrastructure.
- 4.27 The zoning of the West Lisburn/Blaris site for mixed use development would provide a similar basis by which the value generated by housing could cross-subsidise the link road that is essential to the delivery of any development in this location, including strategic employment facilities, and which would offer significant benefits in its own right, including:
- 1 Completion of the “missing link” in the city’s transport infrastructure
 - 2 Enhanced access to new Knockmore Road rail halt;
 - 3 Improved access to the existing Park & Ride facility at the M1/A101 junction;
 - 4 Potential to facilitate improved public transport access around Lisburn
 - 5 Capacity to reduce congestion within Lisburn City Centre by diverting traffic around the City; and,
 - 6 Provision of alternative link to Belfast to ease congestion in the event that the M1 is blocked.
- 4.28 The proposed mixed use would support the vision of the LDP in respect of a “*sustainable economy, society and environment ... a thriving, vibrant and connected place in which people live, work, visit and invest; ... [a] quality place which will enhance the wellbeing and quality of life for all.*” However, by virtue of the risk of non-delivery, there is a significant risk that zoning the whole site for employment could undermine the Plan Strategy.

Justification for mixed use development at West Lisburn/Blaris

- 4.29 In addition to benefits associated with the funding of the M1-Knockmore link road and the resultant facilitation of the opening up of the site for employment uses, the delivery of housing at West Lisburn/Blaris should be encouraged in itself.
- 4.30 The fact that the West Lisburn/Blaris site has already been zoned for development is important in demonstrating that it is absent of any sensitivities that would render it unsuitable for the uses that are proposed in the draft Plan Strategy. Its suitability for housing has been considered in the context of the approach set out in the SPPS, as follows:
- 1 The need for housing;
 - 2 Alternative sources of potential housing supply;
 - 3 Use of the RDS housing evaluation framework; and,

- 4 The application of a sequential approach for the identification of suitable sites for settlements of over 5,000 population.

4.31 The need for housing is considered in detail in Section 2. The other matters are set out below.

Alternative sources of potential housing supply

4.32 Table 3 of the draft Plan Strategy shows that LCCC is very heavily reliant on existing commitments as a component of its housing supply. These account for 75% of the proposed supply (excluding West Lisburn/Blaris). Additional supply is expected to come forward from urban capacity sites and windfall releases. However, the reliance on commitments has a significant bearing on the settlement strategy.

4.33 Figure 9.1 of the HGS considers the distribution of the housing supply across Lisburn and Castlereagh and noted that the supply in Lisburn is insufficient to cover the full Plan period without the West Lisburn/Blaris strategic site. This table can be updated in the context of the revised housing requirement figure, as follows³⁹:

Table 4.3 Housing land supply as of March 2019

	Past Trends		Supply		
	Av past delivery (2004/5-2018/19)	Future distribution of residual growth (2019-2032) based on past trends	Total		No. years supply
			No.	% of LCCC	
Lisburn, incl West Lisburn	46.6%	401	6,333 (Excl W. Lisburn: 4,983)	51.3% (Excl W. Lisburn: 40.4%)	15.8 (Excl West Lisburn: 12.4)
Castlereagh and Dundonald	19.0%	163	1,706	13.8%	10.5
Carryduff	2.9%	25	1,547	12.5%	61.9
Hillsborough and Calcavy	3.5%	30	501	4.1%	16.7
Moira	3.8%	33	612	5.0%	18.5
Other settlements and countryside	24.2%	174	1,636	13.3%	9.4
Total	100.0%	832 (10,816 ÷ 13)	12,335	100.0%	14.8 (Excl West Lisburn: 13.2)

Source: LCCC / draft Plan Strategy Table 3 / Lichfields analysis

4.34 As the largest and most sustainable settlement, it is important to ensure that an adequate supply of housing can be achieved within the settlement of Lisburn City. The RDS 2035 emphasises the importance of “ensuring an adequate and available supply of quality housing to meet the needs of everyone” (paragraph 3.19). This analysis highlights the need for the release of additional land in Lisburn City to ensure that an adequate housing supply can be maintained across the Plan period. It is also necessary to ensure that Lisburn City can maintain the share of total housing delivery that it has historically achieved.

³⁹ See Sections 2 and 3 for details

Use of the RDS 2035 Housing Evaluation Framework

4.35

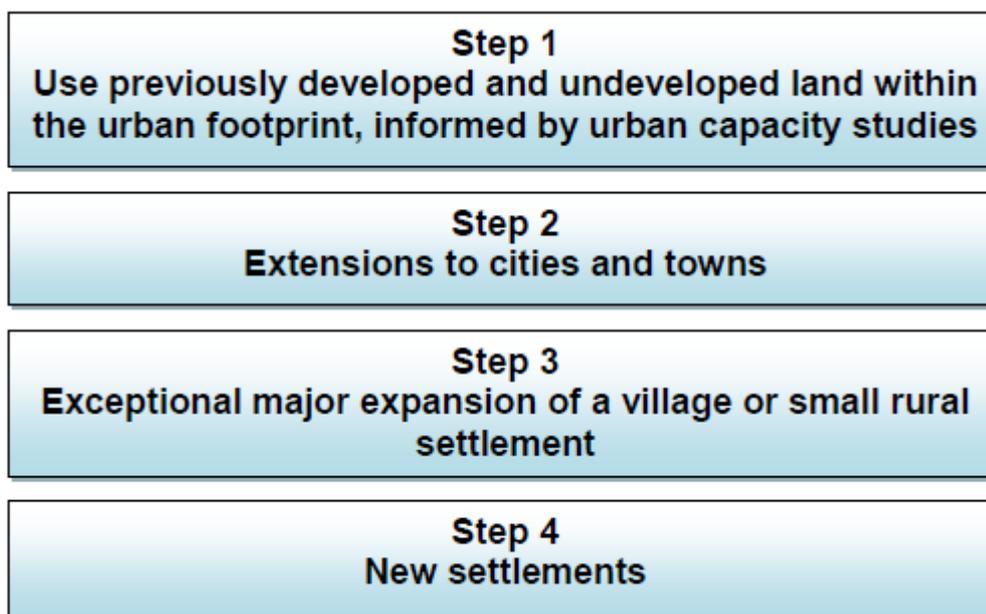
The RDS 2035 outlines the approach to managing housing growth under regional guidance RG8. This approach focuses on developing the main urban settlements (i.e. Lisburn City, the Greater Urban Areas of Lisburn and Castlereagh, and the three towns of Hillsborough & Culcavy, Moira and Carryduff). Matters relating to the Housing Evaluation Framework (HEF) have been covered in more detail in Section 3. However, for the purposes of this consideration of the West Lisburn/Blaris strategic site, we note the following key points:

- 1 Not only is Lisburn City the largest settlement in Lisburn and Castlereagh (at the top of the settlement hierarchy) it is also the highest scoring in the HEF with a high score for all of the metrics other than the transportation test (for which it achieves a medium score);
- 2 The Sustainability Appraisal for the West Lisburn/Blaris site demonstrates how it can support the approach set out in the RDS 2035, namely:
 - a The importance of delivering high quality accessible housing without any harm to the local character and environmental quality or residential amenity;
 - b The emphasis on the relationship between the location of housing, jobs, facilities and services/infrastructure, and the potential for housing as part of a mixed use development; and,
 - c The objective of ensuring that development to meet future needs does not result in the use of a disproportionate amount of regional resources.
- 3 The fact that the West Lisburn/Blaris employment zoning has not resulted in development of the land means that it represents an under-used resource within the urban area. Its rezoning for mixed use purposes would therefore represent a sustainable solution which supports the economic strategy for LCCC by facilitating the delivery of employment development in this location. It would also help to meet the identified need for residential development and reduce the need for the release of additional land elsewhere in the authority area.
- 4 In the broader context, the site is considered to be one of the most regionally accessible locations in Lisburn and Castlereagh, located at the cross-roads of the north-south and east-west corridors; its accessibility is enhanced by the location of the Park and Ride facility and the new Knockmore Road rail halt. However, direct access into the site is reliant on the construction of the new M1-Knockmore link which can be subsidised by mixed use development. The link road would create further accessibility benefits.
- 5 The HEF requires the distribution of development sites across Council areas to reflect what might be required to achieve the policy objectives of strengthening Belfast as the regional economic driver. The West Lisburn/Blaris site is uniquely well located and this will play an important role in respect of this objective, whilst the proposed development will also support employment growth in Lisburn City.
- 6 The proposed mixed use development at West Lisburn/Blaris will boost community facilities and enhance the sustainability of the area in a way and to an extent that is not possible with the BMAP zoning for a single employment use. In particular the inclusion of housing on the site would offer the potential to enhance the future use of the Strategic Greenway identified in DfI's publication, *Exercise, Enjoy, Explore – A Strategic Plan for Greenways*.

The application of a sequential approach for the identification of suitable sites for settlements of over 5,000 population

4.36 The SPPS sets out a sequential approach that is to be followed in respect of the identification of suitable sites for development in settlements that have a current population of more than 5,000 people. This is illustrated below.

Figure 4.1 Application of a sequential approach and identification of suitable sites



Source: SPPS Diagram 3

4.37 Given the role of Lisburn at the top of the settlement hierarchy, its status as the only city in Lisburn and Castlereagh, and the results of the HEF, it is appropriate that it should accommodate a substantial proportion of LCCC's future housing growth. However, as detailed above, there is insufficient land available in Lisburn to meet the identified housing requirement in full, even allowing for windfalls and urban capacity sites.

4.38 Recognising that the identified housing needs for Lisburn City cannot be satisfied through Step 1 alone, it is appropriate also to consider other elements of the sequential approach. The West Lisburn/Blaris site represents Step 2 (even though the site is located within the existing settlement boundary) and is therefore fully compliant with the requirements of the SPPS. It has the added benefit of already being zoned for development within the existing settlement development limits.

Housing-related benefits

4.39 The Socio-economic profile and forecast of Lisburn and Castlereagh that was prepared by Oxford Economics recognised that the "*planned developments in West Lisburn will be important for the housing market*" whilst the Sustainability Appraisal for the site identified significant positive outcomes for the following 7 outcomes:

- 1 Improve health and well-being – through the inclusion of a park/open space which links to strategic greenway;
- 2 Strengthen society – through the creation of jobs and a mix of housing;

- 3 Provide good quality sustainable housing – through the provision of a mix of housing types and tenures in proximity to jobs, thereby reducing the need to travel;
- 4 Enable sustainable economic growth – through the location of the site on key transport corridors which is well-served by infrastructure;
- 5 Manage material assets sustainably – given that the site is already zoned for employment/industry and its suitability for development has therefore already been established;
- 6 Encourage active and sustainable travel – the site benefits from strategic greenway, integrated public transport; and,
- 7 Protect natural resources and enhance biodiversity through the incorporation of a linear park within the site, together with the creation of green and blue infrastructure;

4.40 Positive outcomes were recorded for the following 6 outcomes:

- 1 Enable access to high quality education;
- 2 Protect physical resources and use sustainably – the site is located within Settlement Development Limits and the development will retain a linear park along the River Lagan;
- 3 Improve air quality through the co-location of housing and employment uses;
- 4 Reduce the causes of and adapt to climate change by reducing the need to travel and through the achievement of greater resource efficiency;
- 5 Protect, manage and use water resources sustainably – the linear park will protect the natural floodplain and provide storage for water; and,
- 6 Protect, conserve and enhance the historic environment through the protection and retention of features identified through the masterplan.

4.41 A neutral outcome was recorded in respect of just one outcome (maintain and enhance landscape character) but no negative or significant negative outcomes were recorded.

4.42 The proposed development of 1,500 new homes at West Lisburn/Blaris will make an important contribution to meeting the identified needs for Lisburn and Castlereagh within the emerging LDP period and beyond. By virtue of the quality of the development, the range of homes available and the ease of access to employment opportunities on site, in Lisburn and in Belfast it will be attractive to a wide range of residents. It is anticipated that the development will offer the following benefits:

- 1 The provision of a mix of dwelling types and sizes that will serve a wide range of needs and, in so doing, respond to the wider strategic objectives of addressing an ageing population and the importance of attracting and retaining a younger workforce;
- 2 The delivery of c.130 affordable dwellings;
- 3 Support a range of community facilities that would not otherwise be developed in this area and which will engender a strong sense of local community;
- 4 Enhance the sustainability of the wider area (including the Sprucefield shopping centre) by broadening the range of land uses and reducing the need to travel; and,
- 5 Contribute towards a high quality of life through the combination of a mix of uses, high quality homes and the creation of attractive public open spaces.

Delivery of housing at West Lisburn/Blaris

- 4.43 A planning application has already been submitted for mixed use development on the West Lisburn/Blaris site. This provides an important indicator of market and developer interest in the site. No similar level of interest has ever been demonstrated in respect of the BMAP zoning for a wholly employment-related development in this location.
- 4.44 The Planning Statement (dated October 2019) that was submitted as part of the outline planning application indicated a suggested build rate of 80dpa to 100dpa (paragraph 1.40). It assumed that the first dwellings would be completed in 2022, with 900 to 1,000 dwellings expected to be completed by 2032 (i.e. within the emerging LDP period, paragraph 1.41). It anticipated completion of the scheme by 2035 (paragraph 1.39).
- 4.45 Research undertaken by Lichfields in respect of the assessment of housing delivery rates was set out in its research paper *Start to Finish* which considered the evidence on speed and rate of delivery of large-scale housing based on a large number of sites across England and Wales. An update to the original 2016 report was published in February 2020⁴⁰. This takes account of 97 sites which collectively account for c.195,000 dwellings. It identifies the following average delivery rates for sites of different sizes:

Table 4.4 Average housing delivery by size of site

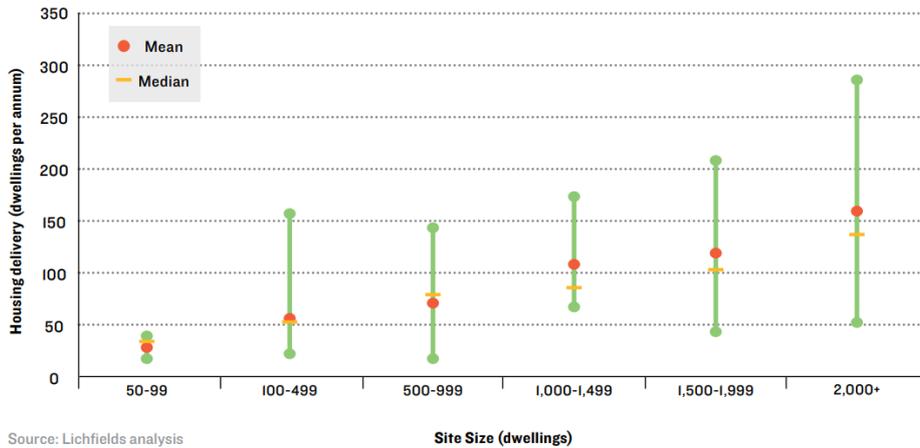
Site size	Average annual delivery	
	Number of dwellings pa	As % of total dwellings on site
0-99	22	29%
100-499	55	21%
500-999	68	9%
1,000-1,499	107	9%
1,500-1,999	120	7%
2,000+	160	4%

Source: Lichfields *Start to Finish* (2020)

- 4.46 Unsurprisingly, the profile of delivery varies considerably across the construction period, and there was also considerable deviation from these average figures. The analysis of average build rates in *Start to Finish* refers to the arithmetic mean across the sample sites. In most cases the median of the rates seen on the larger sample sites is lower, as shown below. This reflects the small number of sites which have higher delivery rates (the distribution is not equal around the average). The use of mean average in the analysis therefore already builds in a degree of optimism compared with the median or ‘mid-point scheme’.
- 4.47 It is also evident that there can be considerable variation in the number of units completed on individual sites within a particular size band. Figure 4.2 below sets out the range. Of particular relevance to the West Lisburn/Blaris site is the fact that:
- 1 Sites of between 1,000 and 1,499 units were found to deliver between 68 and 171 dwellings per annum; and,
 - 2 Sites of between 1,500 and 1,999 units were found to deliver between 45 and 208 dwellings per annum – a much broader range.

⁴⁰ <https://lichfields.uk/content/insights/start-to-finish>

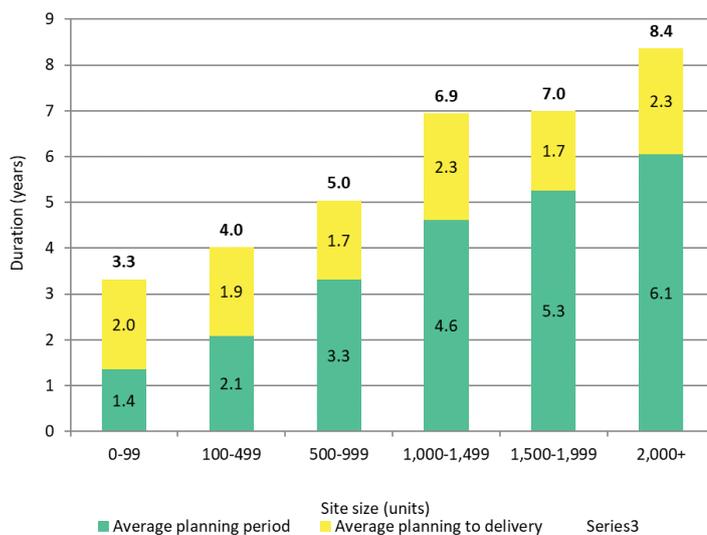
Figure 4.2 Minimum, mean, median and maximum build-out rates by size of site (dpa)



Source: Lichfields, *Start to Finish*, 2020

- 4.48 Whilst even higher build rates were achieved on some sites for individual years, the analysis revealed that these peak rates were not maintained for more than a year or two. It was found that the peak rate was often double the average delivery rate achieved across the full duration of the build period. A particularly high number of dwellings might be completed in a single year when multiple outlets overlap and large amounts of affordable housing is being delivered.
- 4.49 Whilst the build rate set out in the Planning Statement is within the range identified by *Start to Finish*, it is possible that a slightly higher rate of delivery could be achieved.
- 4.50 The *Start to Finish* research also considered the average time taken to grant planning permission for major residential schemes and the post-planning lead-in time to the completion of the first dwelling. The total time taken from the submission of a planning application to the completion of the first dwelling was very similar for schemes of 1,000-1,499 dwellings and 1,500-1,999 dwellings, at c.7 years:

Figure 4.3 Average timeframe from validation of first application to completion of first dwelling



Source: Lichfields, *Start to Finish*, 2020

- 4.51 Based on the submission of the outline planning application in November 2018, this research would suggest that the first dwelling would be completed in 2025. Based on the average build rate of 120dpa, this research suggests that it would then be possible to achieve the delivery of 840 dwellings over the remaining seven years of the LDP period.
- 4.52 Delivery of between 1,350⁴¹ and 1,500 dwellings would depend on planning permission being granted within the next two years, early progress towards the commencement of work on site, and delivery rates at the higher end of the range set out in Figure 4.2 above (170-190dpa, based on an 8-year build period).

Conclusion

- 4.53 The West Lisburn/Blaris site is of significant importance to the economic, housing and transportation strategy of the LDP. The BMAP zoning for employment development has not been implemented and there is no evidence of market interest in this future use of the site or of the ability of an employment-led development to fund the delivery of the new M1-Knockmore link road.
- 4.54 That link road is essential to unlocking the site. It will also deliver considerable added value to the wider area in terms of accessibility and – by easing congestion within Lisburn City Centre and facilitating enhanced public transport options – sustainability.
- 4.55 A mixed use development comprising a large component of housing is considered to have the potential to offer a much more sustainable and viable development option for the site. It would retain a large amount of land for employment development, but commensurate with the substantially reduced level of need for land for B Class development.
- 4.56 The introduction of residential development within the mixed use area at West Lisburn/Blaris would make an important contribution to meeting housing needs within the largest and most sustainable settlement in Lisburn and Castlereagh. In so doing, it would contribute to reduced movement and better alignment between living and working.
- 4.57 Progress through the planning system and on to the commencement of work on site would need to be timely in order for the delivery of 1,350-1,500 dwellings to be achieved within the LDP period. However, there is some flexibility in the supply which will ensure that the identified housing requirement can be achieved even in the event that the West Lisburn/Blaris site does not progress as quickly as anticipated.

⁴¹ 1,350 dwellings represents the figure set out in Table 3 of the LDP - based on the application of a 10% non-delivery allowance.

5.0 Employment Land Issues

- 5.1 A key objective of the Lisburn and Castlereagh LDP is to “drive sustainable economic growth to appropriate locations within the Council area” (Plan Objective B). This is underpinned by a number of specific actions, which include “supporting a thriving a diverse economy with a sufficient supply of land and in locations for a range of employment uses facilitating the creation of new jobs and to encourage existing and new businesses to invest with confidence.”
- 5.2 This objective accords with the requirements of the SPPS for the planning system to “facilitate job creation by ensuring the provision of a generous supply of land suitable for economic development and a choice and range in terms of quality” (paragraph 6.82 Regional Strategic Objectives) and “ensure that there is an ample supply of suitable land available to meet economic development needs within the plan area ... LDPs should zone sufficient land for economic development over the plan period” (paragraph 6.92 Implementation). The SPPS goes on to state that LDPs “should offer a range and choice of sites in terms of size and location to promote flexibility and provide for the varying needs of different economic activity” (paragraph 6.92). Where appropriate, LDPs are to identify previously developed land within settlements for potential economic development use and to identify opportunities for mixed use development, including economic development uses “where this would create synergies and underpin the economic viability of the development as a whole” (paragraph 6.94).
- 5.3 The RDS 2035 similarly requires an adequate supply of land to be identified to facilitate sustainable economic growth (RG1). It requires LDPs to provide for “an adequate and continuous supply of land for employment purposes” and advocates the protection of land zoned for economic use in order to “ensure that a variety of suitable sites exist to facilitate economic growth” (page 34).

Portfolio of employment land

- 5.4 Reflecting the requirements of the RDS 2035 and the SPPS, Table 5 of the draft Plan Strategy notes that there are 220ha of developable land for economic uses within industrial zoned sites. This is required to meet the requirement for 44.85ha of employment land over the LDP period, such that there is a significant over-provision to allow for flexibility and choice. As detailed in Section 4, this significant quantum of land forms part of the justification for the rezoning of the West Lisburn/Blaris strategic site for mixed use purposes. The figure of 220ha identified in the draft Plan Strategy includes 52.49ha at West Lisburn/Blaris, rather than the full 120ha that was zoned for employment development in the BMAP.
- 5.5 Table 5 of the draft Plan Strategy provides an update to Appendix 3 of the ELR which identified 275.4ha of available employment land. The differences between the two tables are summarised below:

Table 5.1 Comparison of ELR Appendix 3 and Draft Plan Strategy Table 5

Site Ref.	Site Name	Total land available for development		
		ELR Appendix 3 (ha)	Draft Plan Strategy Table 5 (ha)	Difference (ha)
LC05	West Lisburn/Blaris	104.98	52.49	-52.49
MCH13	Knockbracken Healthcare Park, Saintfield Road	44.01	44.03	+0.02
CF05	Ballynahinch Road	11.29	9.04	-2.25
CF06	Land at Comber Road	5.26	5.28	+0.02
Total for all 30 sites		275.38	220.68	-54.70

Source: Lichfields analysis of ELR and draft Plan Strategy

- 5.6 The ELR contained detailed site assessments that were undertaken in respect of 20 of the 30 sites. LCCC has subsequently undertaken desk-based assessments of the remaining 10 sites. The detailed proformas for these sites are set out in Appendix 2.
- 5.7 Seven of the ten assessed sites scored highly in relation to access to the road network. However, the scoring process only considered access to A roads and did not specifically take account of the views expressed by consultees that the A1/M1 corridor should be a focus for employment zonings. Of the three sites that were identified as having poor or average road access:
- 1 CF10 was rated as average because vehicles may have issue turning right at peak times;
 - 2 LCO6 is located on a C-class road; and,
 - 3 DAO5 is located in a rural village and currently has no direct access from the strategic road network.
- 5.8 Six sites, including all the Carryduff sites (CF07, CF08, CF10, CF11) scored well in relation to proximity to residential areas and community facilities. This is particularly important for the B uses that support larger numbers of jobs per square metre, i.e. B1 and B2 uses. The only sites to score poorly were in West Lisburn due to being located slightly further away from existing residential areas. However, it is noted that accessibility is likely to be improved significantly for these sites following implementation of the proposed M1-Knockmore link road whilst proximity to residential areas will benefit from the development of housing on the West Lisburn/Blaris site.
- 5.9 It is also important to take into account the need to avoid conflict between adjoining uses, which can be an issue particularly for heavier industrial uses (B3) and transport/distribution (B4). However, none of the sites were identified as poor in this respect.
- 5.10 Only two sites (LCO6 and DAO5) were found to be poor in respect of land classification. These are totally undeveloped greenfield sites whilst the other sites are previously developed. The two greenfield sites also scored poorly in terms of market demand, owing largely to their more rural location.
- 5.11 The assessment of the remaining ten sites supports and supplements the findings of the ELR, which demonstrates that the existing portfolio provides a range of good and average quality sites across Lisburn and Castlereagh, not limited to a particular geographical area. It also supports the original five key areas which were identified as:
- 1 Lisburn;
 - 2 Derriaghy;
 - 3 Carryduff;
 - 4 Newtownbreda; and,
 - 5 Dundonald.
- 5.12 A summary of the score for each criterion is set out in Table 5.2 below.

Table 5.2 Qualitative analysis of employment sites not reviewed in ELR

Site ref	Site name	Overall score	Access			Site context				Environment				Market strength
			Road access	Public transport access	Pedestrian/cycle access	Proximity to residential area/community facilities	Brownfield/greenfield status (undeveloped area only)	Adjoining uses	Proximity to infrastructure	Landscape and environmental designations	TPOs	Topography	Flood risk	Market strength
Good														
CF07	Cyril Johnston Ltd, Ballynahinch Road, Carryduff	33	3	2	2	3	3	2	3	3	3	3	3	3
CF08	Carryduff Business Park, Comber Road, Carryduff	31	3	1	2	3	3	2	3	3	3	3	3	2
CF10	Eastbank Road, Carryduff	30	2	3	2	3	2	3	3	2	3	2	3	2
CF11	Edgar Industrial Estate, Carryduff	29	3	1	2	3	3	2	3	3	3	3	1	2
LC11	Enterprise Crescent, Ballinderry Road, Lisburn City	34	3	2	2	3	3	3	3	3	3	3	3	3
LC12	Ballinderry Road, Lisburn	34	3	2	2	3	3	3	3	3	3	3	3	3
LC13	Flush Park Industrial Estate, Knockmore Road/ Moira Road, Lisburn	32	3	3	3	1	3	3	3	3	3	3	2	2
LC15	Coca-Cola Plant, Lissue Road, West Lisburn	28	3	1	2	1	3	2	2	3	3	3	3	2
Average														
LC06	Lissue Road, Lisburn	25	2	1	1	1	1	3	3	3	3	3	3	1
Poor														
DA15	South of Woodvale Development, Rathfriland Road, Dromara	22	1	1	2	2	1	2	2	2	2	3	3	1

Source: LCCC

5.13 The analysis of the employment land supply is important in demonstrating that there is an adequate supply of high-quality land to meet the identified employment needs for Lisburn and Castlereagh over the LDP period. Of the total quantum of land identified in Table 5 of the draft Plan Strategy:

- 1 51.19ha is identified as being of high quality (14 sites);
- 2 89.03ha is of average quality (10 sites); and,
- 3 80.46ha is of poor quality (6 sites).

5.14 However, as detailed in Section 4, a mixed use development would significantly improve the rating of the West Lisburn/Blaris site and would increase its score from 23 (poor) to 33 (good). Consequently:

- 1 103.68ha would then be identified as being of high quality (15 sites);
- 2 89.03ha remain of average quality (10 sites) and then,
- 3 27.97ha would be of poor quality (5 sites).

Approach to zoned employment sites identified as poor

5.15 LCCC propose to retain all existing zoned employment land, with the exception of the part of the West Lisburn/Blaris site which is to be rezoned for housing. Although no assessment has been undertaken in relation to the potential rezoning of the sites that were rated as being poor in respect of employment land issues, it should be noted that (with the exception of West Lisburn/Blaris):

- 1 Three of the sites (ML05, LC07 and LC08) suffer from at least one environmental constraint for which they have been afforded a score of “1” (poor) (ML05 and LC08 in relation to landscape/environmental designations; LC07 in relation to flood risk);
- 2 Three of the sites (ML05, LC08, DA05) suffer from at least two accessibility constraint for which they have been afforded a score of “1” (poor);
- 3 The other two sites (GY05, LC07) suffer from one accessibility constraint; and,
- 4 Two of the sites (GY05 and LC07) are located more than 500 metres from small villages/residential areas and two (GY05, LC08) are located on the edge of a settlement.

5.16 Furthermore, only two of the five sites are fully undeveloped. The other three are partially developed. This could raise potential amenity issues were the remaining land to be released for residential development which could undermine the operation of the existing employment premises.

Table 5.3 Amount of land remaining in employment sites identified as being poor

Site Ref.	Site Name	Total area (ha)	Developed (ha)	Remaining (ha)
DA05	South of Woodvale Development, Rathfriland Road, Dromara	3.54	0	3.54 (100%) Vacant greenfield land, of which 3.28ha is available and 0.26ha is undevelopable
GY05	Land NW of Gobrana Road, Glenavy	6.27	0	6.27 (100%) Vacant greenfield land
LC07	Lissue Road, Lisburn City	14.34	3.48 Non-B Class uses and car park/circulation	10.86 (75.7%) Vacant greenfield land

LC08	Barbour Threads Mill, Mill Street, Lisburn	5.53	2.7 0.22ha B Class and 2.48 car park / circulation	2.83 (51.2%) Vacant brownfield land
ML05	Seymour Hill Industrial Estate, Lisburn	10.8	6.07 1.69ha B Class, 2.15ha ancillary and 2.23 car park/circulation	4.73 (43.8%) Vacant greenfield land

Source: Lichfields analysis of LCCC monitoring data

- 5.17 It should be noted that on DA05, recent outline approval has been granted consisting of 46% industrial, 46% residential and 8% open space in accordance with draft BMAP which corresponds with the recommendation from the PAC inquiry for a mixed use zoning. None of the remaining sites are considered likely to represent suitable locations for residential development and so rezoning for that purpose would not be appropriate. Furthermore, in view of the supply of land for housing, much of which comprises land that is already committed for this type of development, there is no need for LCCC to identify additional sources of supply.

Approach to unzoned employment sites

- 5.18 LCCC has not undertaken a review of existing unzoned employment land or considered whether any sites might appropriately be released for other uses. LCCC's approach to the retention of unzoned employment land is set out in Policy ED7 of the draft Plan Strategy (Part 2) which takes account of the SPPS (paragraph 6.89 Regional Strategic Policy) that states:

“While the same principle should also apply generally to unzoned land in settlements in current economic development use (or land last used for these purposes); councils may wish to retain flexibility to consider alternative proposals that offer community, environmental or other benefits, that are considered to outweigh the loss of land for economic development use”.

- 5.19 Policy ED7 sets out a number of criteria that will be taken into consideration in the determination of planning applications for development proposals that would result in the loss of Class B2, B3 or B4 uses. These relate to matters such as:
- 1 The potential contribution to the local economy;
 - 2 The proposal being for a compatible sui generis employment use of a scale, nature and form that is appropriate to the location;
 - 3 The present use having a significant adverse impact on the character and amenities of the surrounding area;
 - 4 The site being unsuitable for modern employment purposes;
 - 5 An alternative use securing the long-term function of a building with architectural or historic interest; and,
 - 6 The existence of a definite proposal to replicate existing economic benefits on an alternative site in the local area.

- 5.20 The policy states that proposals for the reuse or redevelopment of an existing Class B1 business use on unzoned land will be determined on its merits.

- 5.21 LCCC clearly recognises the importance of existing business premises to the local economy, albeit that Policy ED7 provides an element of flexibility to enable alternative uses to come forward where this would be more appropriate, in accordance with the SPPS as outlined above.

- 5.22 It is not considered necessary to undertake a detailed review of all existing unzoned employment sites across Lisburn and Castlereagh in order to consider whether these could be zoned for alternative uses. This is because:
- 1 This level of detailed site assessment should be undertaken as part of the LPP process rather than the Plan Strategy.
 - 2 The quantum of existing residential commitments mean that it is not necessary to identify additional land.
 - 3 The only new residential zoning is the mixed use strategic site at West Lisburn/Blaris. This is already zoned for development and lies within the existing settlement boundary. As set out in Section 4, it will deliver wide-ranging benefits including the new M1-Knockmore link road. The strategic importance of this site could not be replicated by the reuse of existing employment unzoned sites.
 - 4 Any unzoned employment sites that do come forward for residential (or other) development may do so as windfall releases, for which provision has been made in the draft Plan Strategy.
- 5.23 We similarly do not consider that it is necessary to investigate whether existing unzoned employment sites under 0.5ha that are currently underused could be zoned for employment purposes. This is because:
- 1 As existing employment locations, it would not be appropriate to zone these sites and count them towards the strategic employment requirement. Whilst it might be possible to increase the efficiency with which these sites are used, including these as contributing towards the strategic requirement would effectively be double counting against past delivery.
 - 2 In any event, the very significant quantum of developable land for employment purposes means that there is no need to supplement this with additional unzoned sites.
 - 3 It is likely that many of the unzoned employment sites will be small and questions remain as to why some of the sites are underused. This may be due to them not offering a high-quality environment or being well located for commercial development. These factors could undermine their potential future increased use or reuse.
- 5.24 In the event that there is a need for additional land to come forward for either residential or employment use, this should be addressed at the appropriate stage of the Plan process, i.e. as part of the LPP preparation.

6.0 Impact of Covid-19

6.1 The SPPS is very clear regarding the role of the planning system in promoting economic growth and the close relationship that exists between housing and the economy:

“A key dimension of sustainable development for Northern Ireland is economic growth. This requires the planning system to protect the things we cherish ... while unlocking development potential, supporting job creation and aiding economic recovery for the benefit of all our people.” (paragraph 2.2).

6.2 In relation to achieving sustainable development it states:

“For the planning system furthering sustainable development in the long-term public interest requires the integration and balancing of complex social, economic and environmental factors when plan-making and decision-taking. ... This means:

- **On the needs and aspirations of our society** – facilitating sustainable housing growth in response to changing housing need (including delivery of social and affordable homes)...
- **On the economy** – contributing to the Executive’s key commitments and priorities for promoting economic recovery and balanced growth...” (paragraph 3.3).

“Housing, by way of example, 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.” (paragraph 3.5).

6.3 In relation to implementation of the planning process it states:

“Successful implementation of the SPPS requires planning authorities to focus on delivering spatial planning. This requires a positive and proactive approach to planning, and a coherent long-term policy framework to guide and influence future development across the region.” (paragraph 5.4).

6.4 In preparing the LDP, LCCC has had very close regard for these requirements. It has prepared a Plan Strategy that is ambitious yet realistic. The development requirements that it contains for housing and employment will play an important role in driving forward the economy of Lisburn and Castlereagh – which is already stronger than that of adjoining local government districts⁴². It will be able to do this principally because the strategy is deliverable.

6.5 Paragraph 2.2 of the SPPS (sustainable development) refers to the way in which the planning system may aid economic recovery. As we continue to feel the wide-ranging impacts of the Covid-19 pandemic, that role is more important than ever. Although the draft Plan Strategy was prepared prior to the outbreak of Coronavirus, and in a very different economic climate, it is not considered that the LDP strategy, which covers the period to 2032, should be adjusted to provide for a lower level of future development and growth.

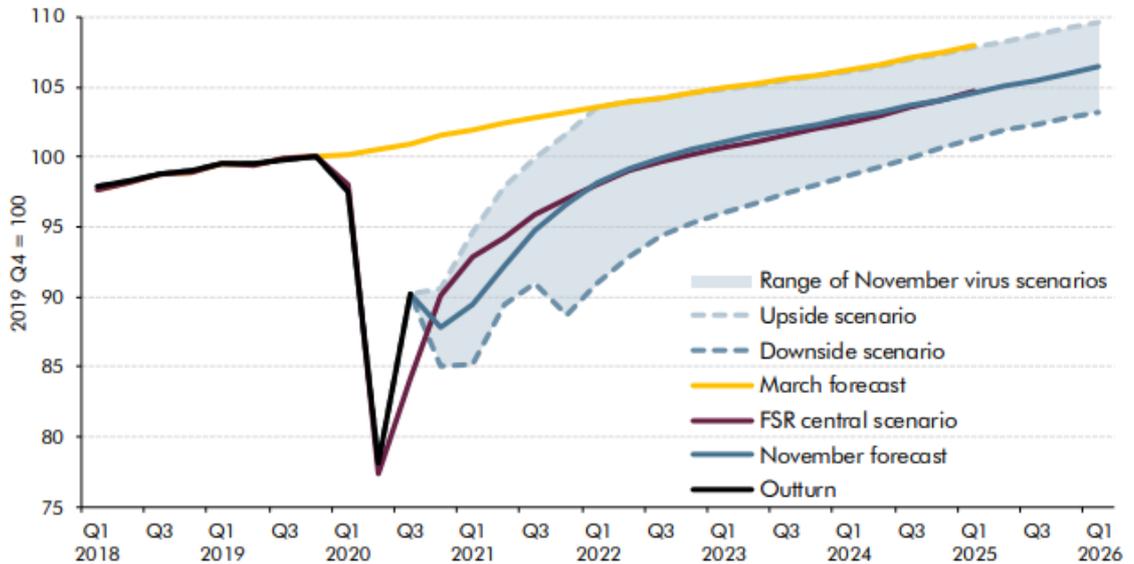
Economic impact of Covid-19

6.6 The economic impacts of the Covid-19 pandemic are without parallel. The Office for Budgetary Responsibility (OBR) forecasts that the UK’s GDP will fall by 11.3% in 2020 – the largest drop in

⁴² See Oxford Economics Socio-Economic Profile of Lisburn and Castlereagh

annual output since the Great Frost of 1709. The economy is expected to return to growth in 2021 but will not reach pre-Covid levels until the end of 2022.

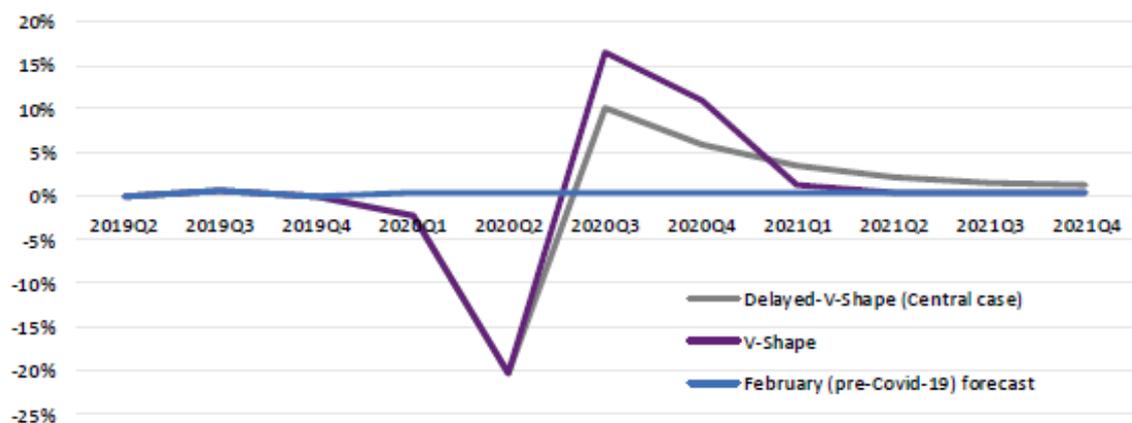
Figure 6.1 Real GDP: central forecast and alternative scenario



Source: OBR: Economic and fiscal outlook (November 2020). Chart 1.2

6.7 The “shape” of the economic recovery that is anticipated by the OBR reflects the “delayed V-shaped” recovery that has been identified by Experian. Whilst the Experian modelling anticipates a return to pre-Covid levels by the end of 2021, it is important to note that this analysis was prepared in September 2020 and does not take account of the second wave of infections and restrictions. It also assumes that a favourable trade agreement is reached with the EU. On this basis, the OBR forecast is not considered to be unreasonable.

Figure 6.2 UK GDP - quarter-on-quarter growth



Source: Experian Business Strategies, September 2020

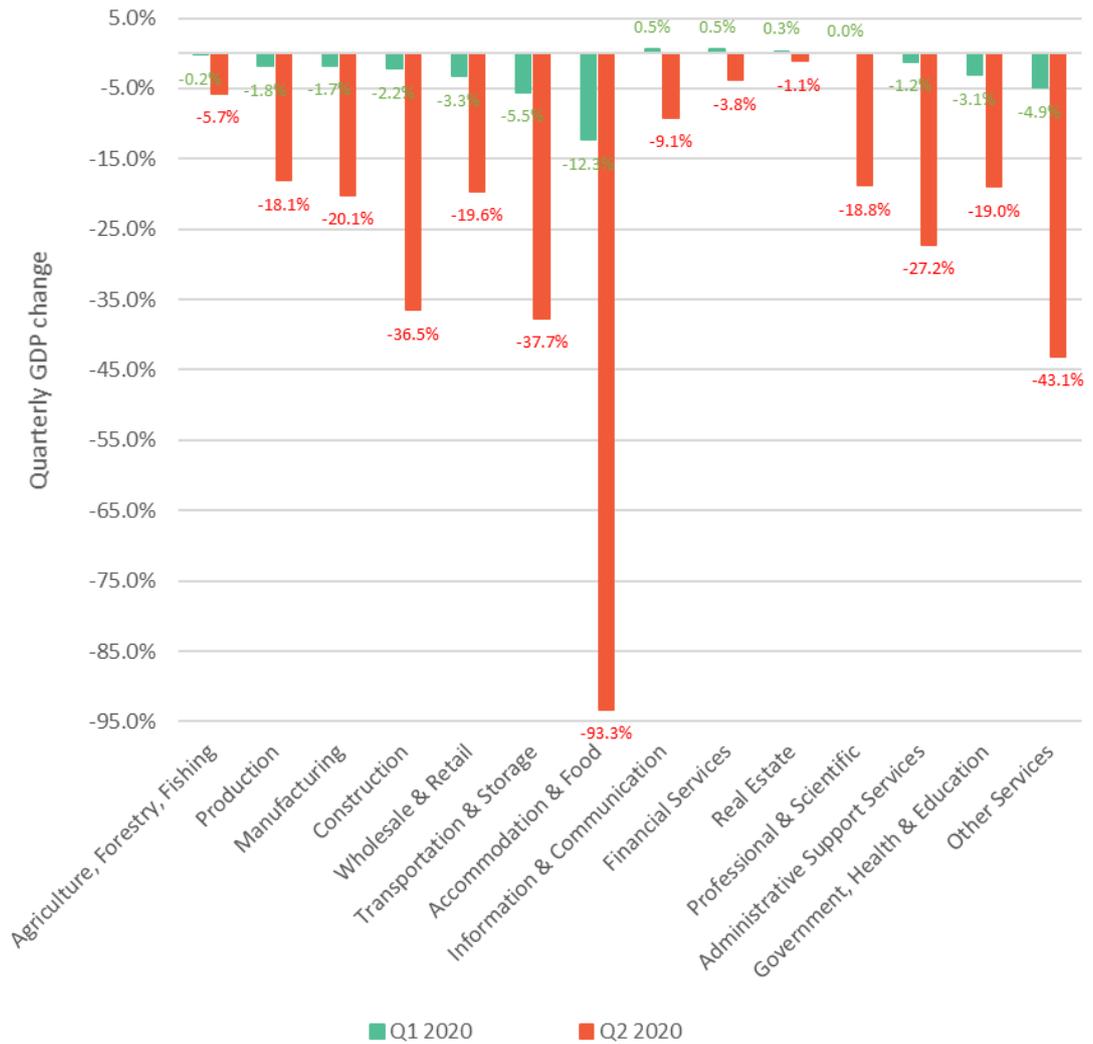
6.8 The effect of Covid-19 in Northern Ireland is illustrated by the NISRA Index of Production which indicated that there had been a 14.9% fall in the second quarter of 2020. This reduction was driven by decreases in the following sectors:

- 1 Manufacturing: -14.6%;
- 2 Water supply, sewerage and waste management: -19.2%;

- 3 Electricity, gas, steam and air conditioning supply: -7.2%; and,
- 4 Mining and quarrying: -20%

6.9 Research by Fraser of Allander Institute on behalf of the Department for the Economy⁴³ found that GDP in Northern Ireland fell by 2.5% in the first quarter of 2020 and by 20.8% in the second quarter. This is slightly worse than the UK-wide position (Q1: -2.2%, Q2: -20.4%). The key drivers of this decline are illustrated below:

Figure 6.3 Modelled GDP growth in Northern Ireland, Q1 and Q2 2020



Source: Fraser of Allander Institute

6.10 Using this evidence, we have categorised the economy into three categories, as follows:

⁴³ <https://www.economy-ni.gov.uk/sites/default/files/publications/economy/impact-covid-19-ni-economy-modelled-results-q2-2020%20pdf.pdf>

Table 6.1 Categorisation of relative risk of Covid-19 by sector

Category	GDP performance in Q2 2020	Sectors
High Risk	Decline of more than 30%	Construction Transport & Storage Accommodation & Food Administrative support services Other services
Medium Risk	Decline of between 10% and 30%	Production Manufacturing Wholesale & Retail Professional & Scientific Government, Health & Education
Low Risk	Decline of less than 10%	Agriculture, Forestry & Fishing Information & Communications Financial services Real Estate

Source: Lichfields analysis based on Fraser of Allander Institute research

- 6.11 Application of the economic profile of Lisburn and Castlereagh⁴⁴ to this categorisation reveals that 27.6% of jobs are in the high-risk category, 67.2% are in the medium risk category and just 5.1% are in the low risk category. The fact that such a high proportion of employment in Lisburn and Castlereagh falls within the middle category highlights the resilience of the economy. This is reflected in the Socio-Economic Profile and Economic Forecast that was prepared by Oxford Economics. Despite a mixed historic performance, with strong growth in the early to mid-2000s, followed by an adverse impact from the 2008 financial crisis and subsequent recession, Oxford Economics reports that the local economy has enjoyed relatively strong performance in recent years.
- 6.12 The circumstances that have prompted the current downturn are very different to anything that has gone before and the sectoral profile of impact is also different. To that end, comparisons with the way in which the local economy recovered from the previous recession will not necessarily provide a reliable indication of future performance. However, the fact that the economy returned to annualised employment growth of between 2% and 4% between 2015 and 2017 should be viewed as a positive indication of its capacity to recover from the current crisis.
- 6.13 Going forward, Oxford Economics forecast that employment in Lisburn and Castlereagh will increase by 6.7% between 2017 and 2032. This is lower than the growth of 7.5% that is forecast for Belfast but above the average for Northern Ireland (4.9%) and the UK (6.6%). Whilst these forecasts were prepared before the onset of the Covid-19 pandemic, it should be noted that they were low in the context of (short and long term) past trends and did not inform the employment requirement contained within the draft Plan Strategy. It is difficult to anticipate the level of growth that will be identified by future forecasts. However, when looking at the LDP period as a whole, it is most likely that the economic damage that has been caused by Covid-19 will be fully repaired, such that pre-Covid forecasts are not expected to over-state the long-term growth levels.
- 6.14 Planning for the longer-term recovery is critical to mitigating a risk of continued economic decline. This will require collaborative working between all involved in economic development in order to ensure a favourable environment for investment. The need to restore the economy over the next two years will be supported by the adoption of a positive LDP that is framed in the

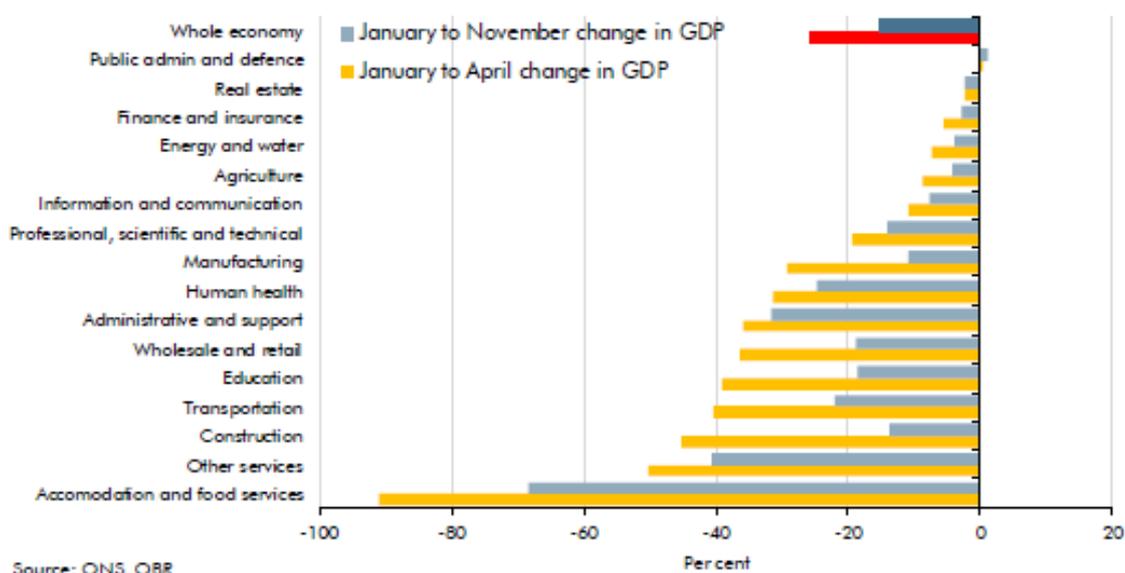
⁴⁴ As illustrated in Figure 3.6 of the LCCC Employment Land Review

context of supporting economic growth. However, it is important to maintain a sharp focus on the LDP time horizon to 2032, over which time the economy is expected to grow significantly. This firmly rebuts any suggestion that the level of growth that is anticipated by the Plan strategy should be adjusted downwards.

Impact of Covid-19 on housing delivery

6.15 Between January and April 2020, the construction sector suffered from a very significant reduction in output (-45%), with only the accommodation and food services (-90%) and other service (-50%) sectors experiencing a greater level of contraction. By comparison, the whole UK economy contracted by 25% over this period. However, despite this very significant initial impact, between January and November, the construction sector has not performed as badly as many other sectors, with a contraction of c.12.5%. This is very similar to the whole economy position of -15% and puts the construction sector in the middle of the economy in terms of loss of sectoral output. Notably, a comparison of the performance of each sector in these two time periods shows that the construction sector experienced the greatest level of recovery between April and November.

Figure 6.4 Peak-to-trough falls in sectoral output



Source: OBR Economic and Fiscal Outlook, November 2020 (Chart 1.4)

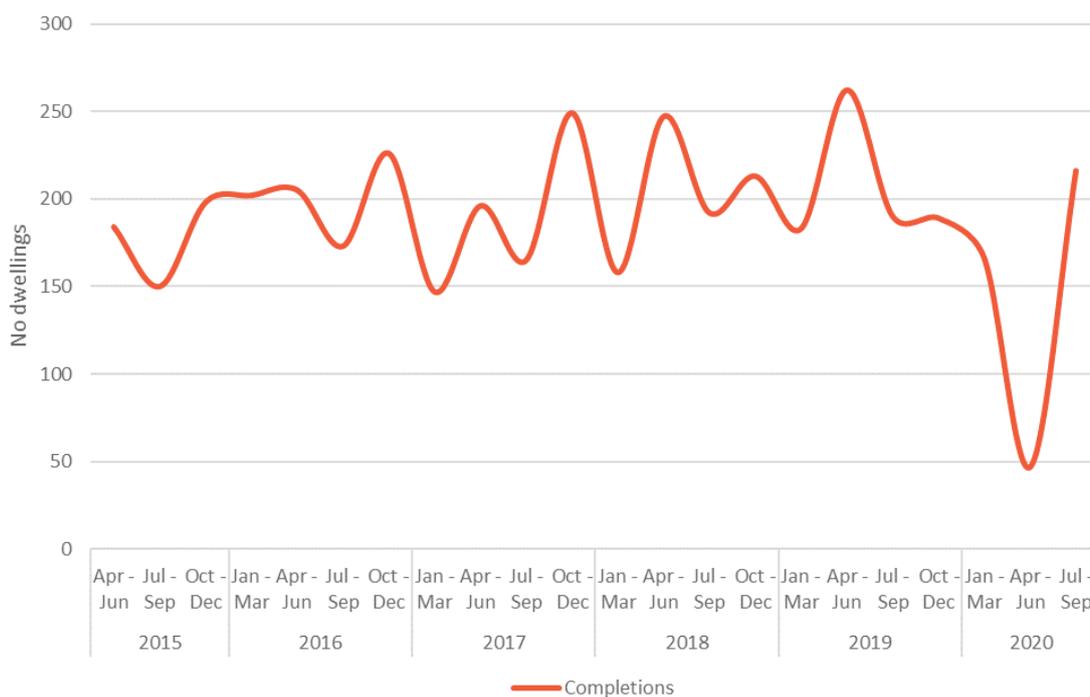
6.16 A review of housing completions data published by the Department of Finance reveals a similar trend in terms of a very significant downturn in output in the second quarter of 2020, followed by a recovery in the third quarter.

6.17 As illustrated in Figure 6.5, just 47 dwellings were completed in Lisburn and Castlereagh between April and June 2020. This represents a 82% reduction on the number of completions in the same period of 2019 (262 completions) and compares to an average of 219 completions in the third quarter of each year between 2015 and 2019.

6.18 The recovery of output in the third quarter of the year was very significant. Between July and September 2020, 216 dwellings were completed. This is 14% more than the number of completions in the same period of 2019 (190 completions) and compares to an average of 174 completions in the second quarter of each year between 2015 and 2019.

- 6.19 The number of completions in Lisburn and Castlereagh increased by 360% between Q2 and Q3 2020. This is the highest level of increase in Northern Ireland and compares to an average 165% increase across Northern Ireland and a 117% increase for Belfast. Whilst the scale of this recovery is positive, it should be viewed in the context of Lisburn and Castlereagh being amongst the worst affected at the start of the pandemic in terms of quarter-on-quarter output.
- 6.20 Going forwards, we anticipate a reduction in the number of completions between Q3 and Q4 2020 in response to the increased restrictions that have been put in place over the autumn and winter. As a result, output in 2020 is unlikely to exceed 550-600 dwellings.

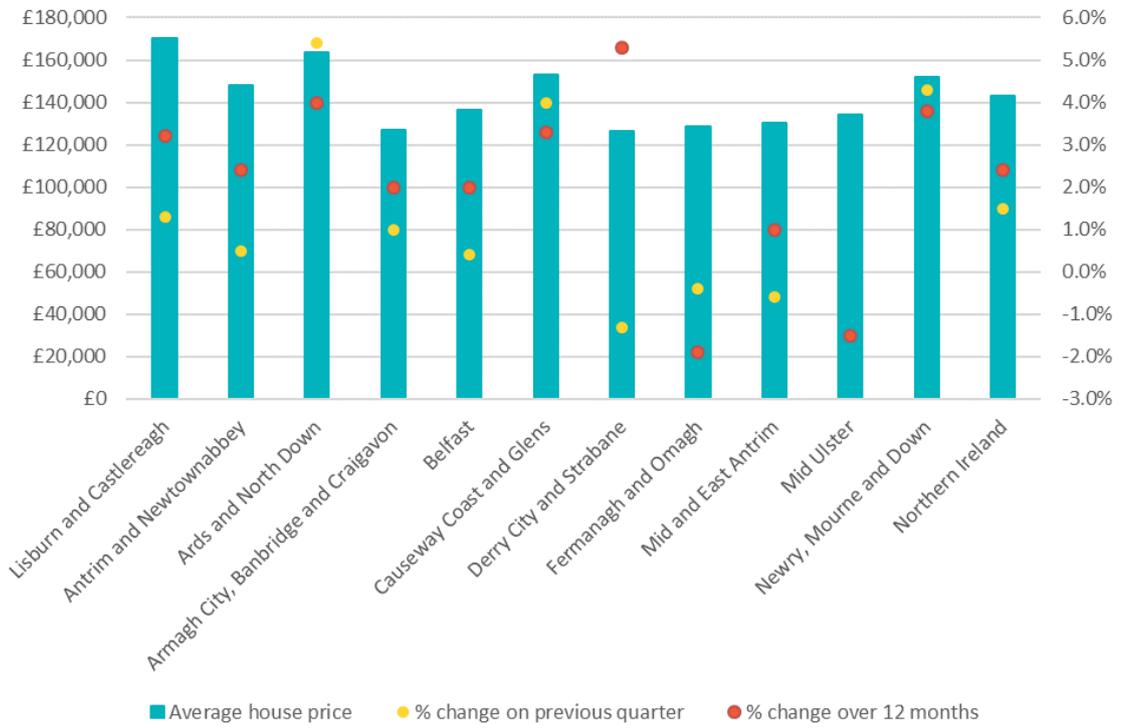
Figure 6.5 Number of new dwellings completed each quarter in LCCC



Source: Department of Finance new dwellings statistics

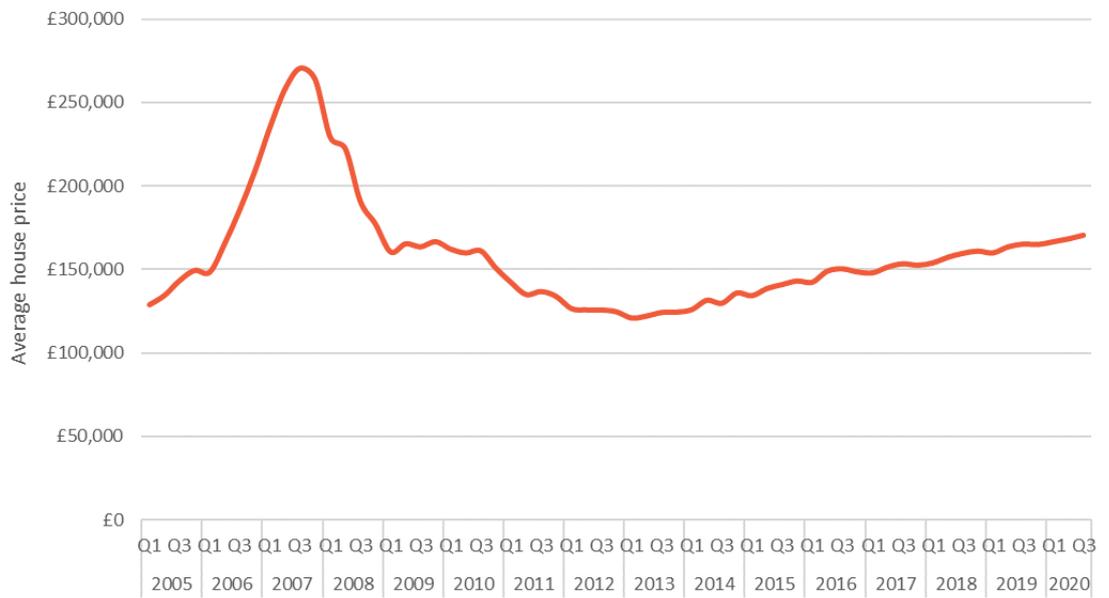
- 6.21 The underlying drivers of demand remain and Lisburn and Castlereagh continues to be a strong housing market area with the highest average house prices in Northern Ireland. Average house prices were £170,530 in Q3 2020 and had increased by 3.2% over the previous 12 months. By contrast, the average house price in Northern Ireland was £143,205 in Q3 2020, having risen by 2.4% in 12 months (see Figure 6.6). It is also noteworthy that house prices in Lisburn and Castlereagh have not fallen at all in 2020, but rather have followed a similar rate of increase to that which has been evident since the start of 2013 when house prices began to recover after the previous recession – an average quarterly increase of 1.2% (see Figure 6.7).
- 6.22 It is therefore reasonable to have confidence that housing delivery in Lisburn and Castlereagh will not suffer from any long-term impacts as a result of the Covid-19 pandemic and the lockdown restrictions. More significantly, we do not anticipate that the demand for housing will experience any correction. As such, there is no justifiable basis by which to reduce the housing requirement contained within the LDP which, as set out above, covers a long-term period to 2032 and is required by the SPPS to facilitate growth.
- 6.23 It should also be noted that the high level of sites that already benefit from planning permission means that LCCC will be well placed to respond quickly when the market recovers and deliver the economic and social benefits associated with residential development in the short term.

Figure 6.6 Average house prices in Northern Ireland (Q3 2020) and change from Q2 2020 and Q3 2019



Source: Department of Finance House Price Index statistics reports

Figure 6.7 Average house prices in LCCC



Source: Department of Finance House Price Index statistics reports

Appendix 1 Housing Evaluation Framework results

	HEF Test					
	Resource	Env Capacity	Transport	Economic Dvp	Urban Rural Character	Cmnty Services
Main urban areas						
Lisburn City	H	H	M	H	H	H
Castlereagh	H	H	M	H	M	H
Carryduff	M	H	M	M	H	M
Hillsborough & Culcavy	H	H	M	M	H	H
Moira	H	H	M	M	H	M
Villages						
Aghalee	M	M	M	L	H	M
Annahilt	L	M	M	L	H	L
Dromara	M	H	M	L	M	M
Drumbeg	L	H	M	L	M	L
Drumbo	L	H	L	L	H	M
Glenavy	H	L	M	M	M	H
Lower Ballinderry	L	H	M	M	H	M
Maghaberry	M	M	M	M	H	M
Milltown	L	H	M	L	H	M
Moneyreagh	M	H	M	M	H	M
Ravernet	L	H	M	M	H	L
Stoneyford	L	H	M	M	H	L
Upper Ballinderry	L	H	M	M	H	L
Small settlements						
Ballyaughlis	L	H	L	L	M	L
Ballycarn	L	H	L	L	M	L
Ballyknockan	L	H	M	M	H	L
Ballylesson	L	H	L	M	H	M
Ballynadolly	L	M	M	L	M	L
Ballyskeagh	L	H	M	M	H	L
Boardmills	L	M	L	L	L	M
Carr	L	L	L	L	M	M
Crossnacreevy	L	H	M	M	H	L
Drumlough	L	H	M	L	M	L
Drumlough Road	L	M	L	L	M	L
Dundrod	L	M	L	L	M	M
Duneight	L	M	M	L	H	L
Fuemore	L	H	M	M	H	L
Halfpenny Gate	L	M	L	L	H	L

Halftown	L	M	M	L	M	M
Hillhall	M	H	L	M	M	M
Kesh Bridge	L	L	M	M	M	H
Lambeg	L	H	M	M	H	L
Legacurry	L	H	M	M	H	M
Long Kesh	L	H	M	M	H	M
Lower Broomhedge	L	H	M	M	H	L
Lurganure	L	H	M	L	H	L
Lurganville	L	M	L	L	M	L
Lurgill	L	H	M	M	H	L
Magherconluce	L	M	L	L	M	L
Morningside	L	L	M	L	H	L
Purdysburn	L	H	L	M	H	L
Ryan Park	L	H	M	M	H	L
St James	L	M	L	L	M	M
The Temple	L	H	M	M	H	L
Tullynacross	L	H	L	L	M	L
Upper Broomhedge	L	M	L	M	H	L

Appendix 2 Employment Site Proformas

Site Address: Cyril Johnston Ltd, Ballynahinch Road, Carryduff			
Site Ref: CF 07	Location: South of Carryduff	Nearest Settlement: Carryduff	Total Area: 2.19ha Developed Area: 2.19ha Remaining Area: n/a
Criteria	Comment		Score
Road access	The site is easily accessible to vehicles from the A24 Ballynahinch Road at the southern point of Carryduff and has an appropriately wide access, splays, etc.		3
Public transport access	The site is accessible by regular buses (520 and 652), approximately every half hour through the day. No rail connections.		2
Pedestrian/cycle access	The site is served by a footpath. Cycling is possible on road. There is no designated cycleway.		2
Proximity to residential area/community facilities	The site adjoins a relatively small housing development to its north-east, and a larger development at its north-west corner.		3
Brownfield/greenfield status (undeveloped area only)	The site is entirely built out. and contains a mix of uses, including a hairdressers, garden centre and furniture showroom.		3
Adjoining uses	As indicated, the site is adjoined by housing to its north, the Ballynahinch Road to its east. The adjacent land to its west and south, whilst currently appears visually as open countryside, is another employment zoning (CF05), its outer edge formed of field hedgerows is the settlement development limit of Carryduff.		2
Proximity to infrastructure	As the site is in the settlement limit of Carryduff, the site has full infrastructure connections.		3
Landscape and environmental designations	Site in proximity (approx. 420m) to Local Landscape Policy Area CF18 South East Carryduff, Carryduff (BMAP 2015). Site is in proximity (approx. 220m) of Area of Constraint on Mineral Developments – Ref. LN 03/81 (Draft BMAP 2015). Site is in proximity (approx. 220m) to Site of Local Nature Conservation Importance (BMAP 2015) – Ref. LN01/47. The site is not within a LCCC Landscape Wedge. However it is noted the site is shielded from these designations by the surrounding industrial zoning CF05 which is yet to be developed.		3
TPOs	There are no Tree Preservation Orders.		3
Topography	The site is flat.		3
Flood Risk	The site is not within the present day river floodplain but is within the present day surface water floodplain (estimated to be less than 10% of site).		3
Market Strength	The site main use is established for the hiring of plant and equipment hire.. However, the use of the site for Class B has been diluted to include garden centre, showroom/retail and hairdressing uses in recent years.		3
Overall comments	Although now built-out, this is a well-connected and popular location home for a range of uses – A1, B1, B2 and B4, with the latter Storage and Distribution use taking up around 40% of the land use. There would appear to be on-going market interest in what is essentially a mixed use site.		33

Site Address: Carryduff Business Park, Comber Road, Carryduff			
Site Ref: CF 08	Location: East Carryduff	Nearest Settlement: Carryduff	Total Area: 5.13ha Developed Area: 4.97ha Remaining Area: 0.16ha
Criteria	Comment		Score
Road access	The site has three sufficiently wide accesses to the adjacent public road (Comber Road – B178).		3
Public transport access	There is no provision for public transport at this location.		1
Pedestrian/cycle access	No on-road cycle lane. Road entrances are not considered pedestrian-friendly although the site is accessible on foot from all parts of Carryduff.		2
Proximity to residential area/community facilities	The site is located less than 200 metres east of residential areas of Carryduff and the same distance to the south of a new housing development under construction which will include community facilities positioned opposite this site.		3
Brownfield/greenfield status (undeveloped area only)	Site is almost totally developed, with only a small portion of green field left (0.16 hectares)		3
Adjoining uses	Churches and residential to the west/north-west, industrial opposite on the Comber Road, undeveloped industrial land to the east and countryside to the south.		2
Proximity to infrastructure	The site, within the settlement of Carryduff, is assumed to have all necessary infrastructure connections.		3
Landscape and environmental designations	Other than Carryduff Park, an area of existing open space to the North West on the opposite side of Comber Road, there are no designations in this location.		3
TPOs	There are no TPOs.		3
Topography	Southern edge of site is hilly and difficult to expand, otherwise site is flat.		3
Flood Risk	Small watercourse culverted along the western boundary of the site but no history of it flooding on Flood Maps NI.		3
Market Strength	The site appears to be a popular location, currently with a mix of uses. There has been recent interest in the remaining greenfield area of the site, although LA05/2018/0360/PAD for a further extension to the site towards the south-west, was declined.		2
Overall comments	This site is mainly in B2 use, with ancillary offices and storage & distribution areas. Aside, there is a large unit in D1 use – a children's indoor play area. There is some developable land remaining in the south-west corner of the site. No real issues aside from the non-industrial uses and the fact that the site cannot be developed further to the south due to hills.		31

Site Address: Eastbank Road, Carryduff			
Site Ref: CF 10	Location: Saintfield Road, Carryduff	Nearest Settlement: Carryduff	Total Area: 1.96ha Developed Area: 0.98ha Remaining Area: 0.98ha
Criteria	Comment		Score
Road access	Adequate road access, although right turning to/from Saintfield Road (A24) may be an issue.		2
Public transport access	Site accessible by regular buses. Buses 652, 652c, 516, 520 pass every 20/30 mins.		3
Pedestrian/cycle access	Easily accessible by foot and cycle and there are long-term plans for a greenway in this area.		2
Proximity to residential area/community facilities	Very close proximity to many houses and Carryduff Park to its south east.		3
Brownfield/greenfield status (undeveloped area only)	The site retains 0.98 hectares green field (exactly 50% of its total size).		2
Adjoining uses	Environmental/Open Space forms most of the southern/south-eastern boundary. The remainder of the boundary adjoins residential. This is acceptable as there is a lack of industrial businesses on site.		3
Proximity to infrastructure	The site, within the settlement of Carryduff, is assumed to have all necessary infrastructure connections.		3
Landscape and environmental designations	An LLPA (CF16) adjoins the site to the south and Carryduff Park to the south-east.		2
TPOs	There are no TPOs.		3
Topography	The site has a differentiation in levels. The southern half of is higher than the northern half and there is a rise from west to east upon entering the site.		2
Flood Risk	Although a small watercourse forms the northern boundary, the site is not recorded to have historical flooding on Flood Maps NI.		3
Market Strength	The site seems to be developing slowly for smaller businesses, start ups and other non-industrial uses owing to its limited size and hilly nature.		2
Overall comments	<p>The site has naturally expanded to the east with Eastbank House built outside the zoning. This is understandable due to the way the designation line was drawn.</p> <p>LA05/2018/1105/F - Change of use from commercial/retail unit to Irish language nursery school with outdoor soft play area with associated safety perimeter fencing, at unit frontage (approved).</p> <p>New build outside of the zoning (south-east of McKibbin House) - Application reference LA05/2016/0504/F was approved for D1 community and cultural use and associated offices to be named East Bank House – under construction in October 2018.</p> <p>The only other approval of note is LA05/2016/0662/F Change of use from vacant office (Use Class B1) to Café (sui generis) at Unit 3, McKibbin House (granted 24.10.2016).</p>		30

Site Address: Edgar Industrial Estate, Carryduff			
Site Ref: CF 11	Location: Comber Road	Nearest Settlement: Carryduff	Total Area: 6.73ha Developed Area: 6.05ha Remaining Area: 0.68ha
Criteria	Comment		Score
Road access	The site has six satisfactory road accesses to the adjacent public road (Comber Road – B178).		3
Public transport access	There is no provision for public transport at this location.		1
Pedestrian/cycle access	No on-road cycle lane. Road entrances would not be considered pedestrian-friendly although the site is accessible on foot from all parts of Carryduff..		2
Proximity to residential area/community facilities	The site adjoins a new housing development to its north and east sides and abuts Carryduff Park to its north west.. There is a church directly adjoining the site to the west and existing employment zoning CF08 is to its south on the opposite side of Comber Road.		3
Brownfield/greenfield status (undeveloped area only)	90% of the site is developed, leaving 10% albeit undevelopable greenfield.		3
Adjoining uses	As mentioned above, the site is adjoined by a variety of residential, community and employment uses.		2
Proximity to infrastructure	The site, within the settlement of Carryduff, is assumed to have all necessary infrastructure connections.		3
Landscape and environmental designations	Other than Carryduff Park, an area of existing open space to the south west and north west beyond the Carryduff River, there are no designations in this location.		3
TPOs	There are no TPOs.		3
Topography	Site is flat for the most part.		3
Flood Risk	The site is defined by the Carryduff River along its south west and north west boundary. Part of the site, the Council Recycling Centre, is within the floodplain associated with this river. Flood Maps NI shows historical flooding as a result.		1
Market Strength	<p>Issues:</p> <p>Much of the site is taken up by Sui Generis uses – car sales and the Council’s civic amenity site.</p> <p>The site is also dominated by storage & distribution areas and not reaching its potential.</p> <p>Constraints:</p> <p>Hundreds of new housing units being built to north/north-east</p> <p>Vacancy:</p> <p>Some, with numerous units in B1/B2 use.</p>		2
Overall comments	One of three zonings on Comber Road, this 6.73 hectare site has a mix of uses, with some vacant units. Much of the site is taken up by the storage of motor vehicles and contains some developable land, as well as a road access to a new housing scheme to the north of the zoning. Some of the main features of the site are the Council civic amenity site, and Carryduff Car Auctions.		29

Site Address: Rathfriland Road, Dromara			
Site Ref: DA 05	Location: Southern Dromara	Nearest Settlement: Dromara	Total Area: 3.54ha Developed Area: 0 Remaining Area: 3.54ha
Criteria	Comment		Score
Road access	No road access currently from Rathfriland Road (B7).		1
Public transport access	The only public transport appears to be the infrequent No. 26 bus, running from the centre of Dromara to Lisburn.		1
Pedestrian/cycle access	No cycle/pedestrian access currently.		2
Proximity to residential area/community facilities	The site is in close proximity to the Woodvale residential development which forms the northern boundary and some larger houses to its north-east. There are some shops to the north towards the centre of Dromara.		2
Brownfield/greenfield status (undeveloped area only)	100% undeveloped greenfield site.		1
Adjoining uses	Residential to the north, countryside on all other sides.		2
Proximity to infrastructure	Site lies within the settlement of Dromara and is most probably not currently connected to infrastructure.		2
Landscape and environmental designations	A Local Landscape Policy Area (LLPA DA06) forms a narrow strip along the western site boundary adjacent to a small watercourse.		2
TPOs	Condition 6 of LA05/2019/0533/O protects the trees which form the site boundary.		2
Topography	Site has a slight slope, falling towards a stream on the western site boundary.		3
Flood Risk	Flood Maps NI show surface water flooding evident along the small watercourse on the western boundary and field to west is in the floodplain however this is constrained by sloping ground within the site.		3
Market Strength	The site has had a long history of applications on it, with nothing built as yet, suggesting low market strength.		1
Overall comments	<p>Located south of the settlement of Dromara, this 3.54 hectare site is currently undeveloped. The site comprises most of a single green field, and is relatively flat. The site is defines the Council boundary, which is the stream to its west boundary. The settlement development limit of Dromara extends to its south boundary, whilst the Rathfriland Road lies to its east and a residential area to its north.</p> <p>Mixed use app LA05/2019/0533/O for residential and business units has been approved 23.07.2020.</p>		22

Site Address: Land at West Lisburn, Lissue Road, Lisburn			
Site Ref: LC 06	Location: Lissue Road	Nearest Settlement: Lisburn	Total Area: 3.09 Developed Area: 0 Remaining Area: 3.09
Criteria	Comment		Score
Road access	There is currently no road access off Lissue Road, although access does exist at the adjacent Coca-Cola bottling plant suggesting access is possible.		2
Public transport access	A railway line forms the southern boundary of the site, however the nearest stop is some distance away in the centre of Lisburn, although there are plans for a new halt close by at west Lisburn. No bus routes pass on the Lissue Road.		1
Pedestrian/cycle access	The site is currently not easily accessible on foot or cycle as there is no public footway on Lissue Road. The area is very much rural in nature.		1
Proximity to residential area/community facilities	The only housing nearby is a single farm holding opposite on Lissue Road. No other facilities of note.		1
Brownfield/greenfield status (undeveloped area only)	100% undeveloped greenfield site.		1
Adjoining uses	The site is essentially the field in front (west) of the Coca-Cola bottling plant. Railway to the south, otherwise surrounded by industry.		3
Proximity to infrastructure	The site lies within the settlement of Lisburn and although not currently connected its proximity to nearby industry suggests the necessary infrastructure may already be available.		3
Landscape and environmental designations	There are no environmental designations in the vicinity.		3
TPOs	The site does not have any tree protection on it.		3
Topography	This is a flat site.		3
Flood Risk	No known flooding risk noted from Flood Maps A watercourse makes up the eastern boundary for the most part.		3
Market Strength	No relevant site history, suggesting there is no interest in the development/occupation of the site currently. The site size, due to its constraint by the railway line and adjoining industrial site may be a contributing factor to non-development. However, this is a popular area for employment and there is potential the site may be taken up in future.		1
Overall comments	Located to the south-west of Lisburn City, this small field is 3.09 hectares in size and undeveloped. The site is defined by the fencing of the Coca-Cola plant (LC15) to the north and east, the railway to the south and Lissue Road to the west. The site could be unlocked in the future with the M1-Knockmore link road and railway halt.		25

Site Address: Enterprise Crescent, Lisburn			
Site Ref: LC 11	Location: Ballinderry Road	Nearest Settlement: Lisburn	Total Area: 13.19ha Developed Area: 13.19ha Remaining Area: 0
Criteria	Comment		Score
Road access	Multiple road accesses along Ballinderry Road (B104). All adequate for their uses.		3
Public transport access	The site is not connected by bus or rail, there is a relatively short walk from a bus stop on Moira Road.		2
Pedestrian/cycle access	Although achievable by both cycle and on foot, the site is more geared towards road users.		2
Proximity to residential area/community facilities	The site is in very close proximity to many residences and a new supermarket retailing unit to its west.		3
Brownfield/greenfield status (undeveloped area only)	Site is almost entirely brownfield.		3
Adjoining uses	There is another industrial site opposite and south of the Ballinderry Road, otherwise the site is surrounded by residential use, either existing or zoned lands.		3
Proximity to infrastructure	Within the settlement of Lisburn City, the site has the full range of infrastructure connections.		3
Landscape and environmental designations	There are no nearby environmental designations.		3
TPOs	There are no tree protection orders on the site.		3
Topography	Ground is even throughout.		3
Flood Risk	The site has minimal history of surface water flooding, as indicated on Flood Maps NI.		3
Market Strength	<p>Located in the west of Lisburn City, this popular employment zoning functions well, owing to a convenient location within the city.</p> <p>Relevant recent history:</p> <p>New build (offices) –at left hand side of entrance to Crescent Business Park. LA05/2019/0254/F - Extension to existing office area on ground floor and provision of additional WC space and small meeting area on first floor. LA05/2016/0596/F - Demolition of existing single storey Light Industrial Enterprise Units and replacement with new 2 storey Enterprise Business Offices, with additional in-curtilage parking (LEO)</p>		3
Overall comments	<p>The 13.19 hectare site is totally developed, and is in 4 distinct parts:</p> <p>The predominant use of the site is business and this is reflected in Lisburn Enterprise Organisation (LEO), which contains mainly start-up units in the centre of the site, and Crescent Business Park, which is home to more modern, larger business units.</p> <p>West and north of Enterprise Crescent (the main thoroughfare of the site) are larger B2 industrial units, which have ancillary storage and distribution areas.</p> <p>The site also contains a test centre for the Driver & Vehicle Agency for Northern Ireland.</p> <p>Some alternative uses include a café in LEO and the DVA building.</p>		34

Site Address: Ballinderry Road, Lisburn City			
Site Ref: LC 12	Location: Ballinderry Road	Nearest Settlement: Lisburn	Total Area: 7.43ha Developed Area: 7.43ha Remaining Area: 0
Criteria	Comment		Score
Road access	Adequate road access along Ballinderry Road (B104) for each of the 8 individual units.		3
Public transport access	The site is not connected by bus or rail, however the site is a short walk from bus stops on Moira Road.		2
Pedestrian/cycle access	Although achievable by both cycle and on foot, the site is more geared towards road users.		2
Proximity to residential area/community facilities	The site has housing to the west (Mornington) and across the railway to the south. There is a new supermarket retailing unit to its west.		3
Brownfield/greenfield status (undeveloped area only)	The site is 100% brownfield.		3
Adjoining uses	As alluded to above, there is housing to the west and south, albeit across the railway. The site faces another employment zoning – LC 11, across Ballinderry Road to the north. A vacant field to the north-east is zoned for housing.		3
Proximity to infrastructure	Being located within Lisburn City, the site has all the necessary infrastructure requirements.		3
Landscape and environmental designations	There are no nearby landscape designations.		3
TPOs	No tree protection orders on the site.		3
Topography	Flat site. No topographical issues.		3
Flood Risk	The site has history of surface water flooding to its east and west sides, considered to be less than 15% of the site area, as recorded on Flood Maps NI.		3
Market Strength	<p>Issues & Planning History</p> <p>No interest as yet in Greenwood Business Park since its construction, otherwise the site functions well.</p> <p>Greenwood is in close proximity to the aforementioned Mornington development.</p> <p>LA05/2016/1186/F - extension to existing builders merchants to provide storage area.</p> <p>Constraints</p> <p>Possibly reliant on construction of M1-Knockmore link road, but more importantly Lisburn West (Knockmore) rail halt to further unlock potential of this site.</p>		3
Overall comments	<p>Located in the south-west of Lisburn City, this triangular-shaped zoning is 7.43 hectares in size. The land is almost totally developed, aside from some backland development, which is appropriate for extensions to existing units only. The main feature of the zoning is a recently-constructed business unit – Greenwood Business Park (give app ref) circa 3 hectares which comprises approximately 15,000 sqm of industrial/warehouse units, ancillary office accommodation and trade counter.</p>		34

Site Address: Flush Park Industrial Estate			
Site Ref: LC 13	Location: Knockmore Road/Moira Road	Nearest Settlement: Lisburn	Total Area: 8.47ha Developed Area: 7.07ha Remaining Area: 0.4ha
Criteria	Comment		Score
Road access	One road access on Knockmore Road (A520) and two on Moira Road (A3). Whilst these are acceptable accesses, there is no internal through linkage and the site is effectively two separate parcels. Access will likely be improved with the provision of the M1-Knockmore link road close to this site.		3
Public transport access	The 551 bus travels from Lisburn Bus Centre to Moira hourly, and has stops on Knockmore Road. Whilst the railway defines the northern boundary of the site, the nearest halt currently is in Lisburn City Centre, although there is great potential with the proposed West Lisburn railway halt in close proximity to the site.		3
Pedestrian/cycle access	Site is freely accessible to both pedestrians and cyclists. A dedicated cycle lane passes the Knockmore Road entrance.		3
Proximity to residential area/community facilities	The site is surrounded by housing and there are some shops nearby on the Moira Road.		1
Brownfield/greenfield status (undeveloped area only)	100% brownfield site.		3
Adjoining uses	The site wraps around a housing development at the junction with Knockmore Road/Moira Road so essentially has housing all around aside from the northern boundary, formed by the railway. Opposite the northern boundary is the site of a major transport hub proposal on the railway line. There is another industrial site, across Knockmore Road (LC 14), to the west.		3
Proximity to infrastructure	The site is within the settlement of Lisburn City and as such has all necessary infrastructure connections.		3
Landscape and environmental designations	Other than LLPA (LC36), which is across the Moira Road, behind houses and across the River Lagan south of this site, there are no environmental designations in this area.		3
TPOs	There is no tree protection orders on this site.		3
Topography	The site is essentially split into two parts – Flush Park entrance and Moira Road entrance. The Flush Park, or northern part of the site is slightly higher than the southern, Moira Road half of the site, although this is not an issue.		3
Flood Risk	A culverted watercourse runs through the site to the River Lagan. The site has minimal history of surface water flooding (less than 15% of the site area) as per Flood Maps NI.		2
Market Strength	<p>Issues & Planning History</p> <p>Large area in north-east of the site undeveloped, with no history at all</p> <p>Zoning has extended to meet parking area of residences on Laganville Park</p> <p>Some vacancy including large derelict animal feed suppliers (ABN) on Moira Road</p> <p>Sui generis uses - Bookmakers/Café on Moira Road frontage</p>		2

	Recreational use – Hillsborough Boys FC S/2014/0750/F - Extension/Annex to Warehouse - 9 and 10 Flush Park	
Overall comments	Located in the west of Lisburn City, this compact multi-use zoning is 8.47 hectares in area. The site is mostly developed, although there is a large vacant factory, a sizeable site (1.42ha) in the north-east corner, and a vacant unit on Flush Park, meaning that around half of the site is currently developable. The site lacks identity and has a wide range of uses. The main feature of the site is a large factory (formerly Thompson Feeds), which would have been B3 use and is currently vacant.	32

Site Address: Coca-Cola Bottling Plant			
Site Ref: LC 15	Location: Lissue Road	Nearest Settlement: Lisburn	Total Area: 18.47ha Developed Area: 18.47ha Remaining Area: 0
Criteria	Comment		Score
Road access	The site has an adequate site entrance.		3
Public transport access	Although the railway forms the southern boundary of the site, the nearest stop presently is in the centre of Lisburn, although there are plans for a stop at west Lisburn. No buses pass by Lissue Road.		1
Pedestrian/cycle access	The site is currently accessible on foot or cycle. Whilst there is a public footway on one side of Lissue Road the area remains very much rural in nature.		2
Proximity to residential area/community facilities	The only housing nearby is a farm holding across Lissue Road. No other facilities of note.		1
Brownfield/greenfield status (undeveloped area only)	100% brownfield site.		3
Adjoining uses	The site is surrounded by industry – existing to the north and south, and two zoned industrial sites to the west and north-west.		2
Proximity to infrastructure	The site lies within the settlement of Lisburn and although not currently connected, owing to the nearby industry, the necessary infrastructure could be made available.		2
Landscape and environmental designations	There are no environmental designations of note in the vicinity.		3
TPOs	There are no tree protection measures on site.		3
Topography	No topographical issues. Flat site.		3
Flood Risk	Flood Maps NI indicate that parts of the site are within areas of surface water flooding (less than 15% of site area) but this is unlikely to constrain development to any significance..		3
Market Strength	This is a bespoke site that the occupant required for its proximity to a suitable aquifer supply. Any possible extensions to the plant are constrained by railway lines along its north east and southern boundaries.		2
Overall comments	Located in the west of Lisburn City, this 18.47 hectare site has a single user – Coca-Cola. On site is a manufacturing and bottling plant, offices, with an ancillary visitor centre. The large plant building takes up the centre of the site, with some area for distribution, parking and landscaping. The boundaries of the site are made up of the railway to the south and east, and adjoining zonings to the north (LC07) and west (LC06).		28

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