

Local Development Plan 2032 Consultation Survey

Section A- Data Protection And Consent

Q1. DATA PROTECTION AND CONSENT

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

Section B- Your Details

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

Planning Consultant/ Agent

Q3. Your Details

Name	Carrie McDonagh
Details of Organisation/ Body	One2One Planning
Address	1 Larkfield Avenue
Postcode	BT10 0LY
Email Address	[REDACTED]
Phone Number	

Consent to Publish Response

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

Please publish with my name and organisation

Section C: Your Representation

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

I believe it to be UNSOUND

If you consider the draft plan strategy to be SOUND, and wish to support the plan strategy, please set out your comments below. You can attach any supporting information necessary to justify your SOUND representation by clicking 'choose files' below. (If you consider the draft Plan Strategy to be UNSOUND please go to Q7.)

Support Plan Vision A - A Quality Place - See attached submission

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

No Response

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

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

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

Policy Reference

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

Soundness Test No:

Q8. Please identify which test(s) of soundness your representation relates to, having regard to Development Plan Practice Note 6 (available on the Planning Portal website at https://www.planningni.gov.uk/index/s/development_plan_practice_note_06_soundness__version_2__may_2017_.pdf)

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

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

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

Details

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

See attached sheet

MODIFICATIONS

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

see attached sheet

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

- File: Rep re Milltown Allocation 10th Jan 2020.pdf

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

Representation Complete

PLAN COMPONENT

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

No Response

Soundness Test No:

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

No Response

Details

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

No Response

MODIFICATIONS

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

No Response

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

No Response

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

No Response

PLAN COMPONENT

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

No Response

Soundness Test No:

Q18. Please identify which test(s) of soundness your representation relates to, having regard to Development Plan Practice Note 6 (available on the Planning Portal website at https://www.planningni.gov.uk/index/s/development_plan_practice_note_06_soundness__version_2__may_2017_.pdf)

No Response

Details

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

No Response

Modifications

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

No Response

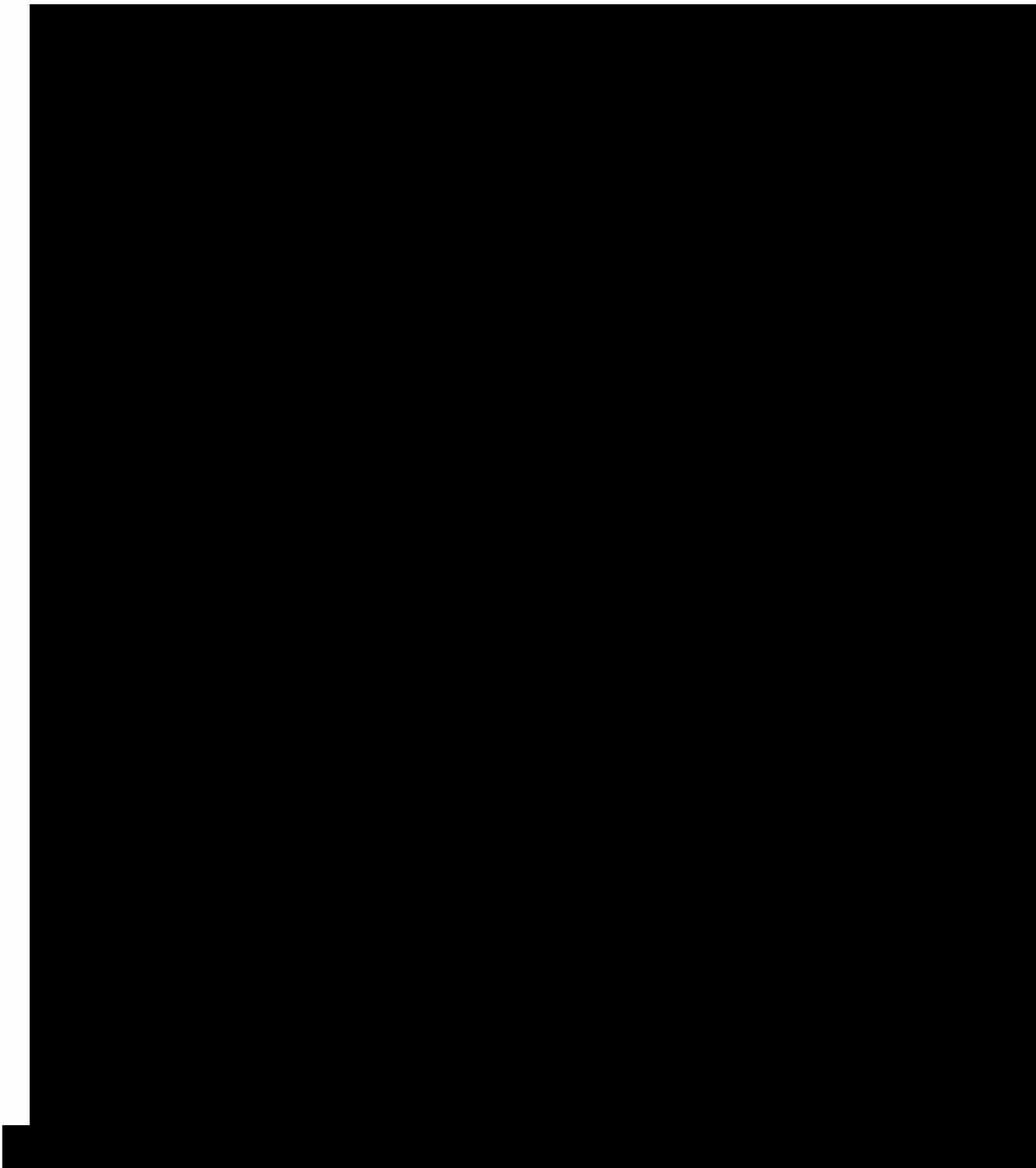
Q20. If you wish to submit further representations you will need to complete a new questionnaire

No Response

SECTION C: DEALING WITH YOUR REPRESENTATION

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

Written Representation



1 Larkfield Avenue
Upper Lisburn Road
Belfast
BT10 0LY

10th January 2020

Plan Manager - Lisburn and Castlereagh Area Plan Team

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

This submission considers the policies within the DPS, relevant to our client having regard to the necessary soundness tests referenced in DPPN 6. Our client has a particular interest in the Overall Plan Vision and Housing Allocation, specifically in respect of the allocation for the village tier including Milltown. In addition, we draw your attention to specific lands at Old Park Road, identified as being suitable for inclusion within the Milltown settlement development limit.

Our client welcomes the Plan Vision A – A Quality Place (Page 34 of Part 1- Plan Strategy) In particular, the references to:

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

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

The Housing Allocation

The section on 'Meeting Future Housing Need'¹ sets out the detail of the housing allocation. While the 2012 HGI shows 9600 units to 2025, this required updating to the full plan period of 2032 and for recent updates to data sources and was increased to 11,550 units². The updated HGI figures of Sept 2019³ updated the base figure to 10,700, an increase of 200 units which was not considered significant.

The extract below at Figure 1, shows the balance of existing lands across the settlement tiers with 14.2% of the Boroughs housing potential allocated to West Lisburn. This is more than all the existing villages and small settlements combined at 11.7%

Table 3 Strategic Housing Allocation over Plan Period

Settlement	Potential Units Remaining	Potential Units on Urban Capacity Sites	Windfall Potential 1-4 Units Projected over 12 year period	Windfall Potential 5+ Units Projected over 12 year period	Total Potential
Uisburn City	4,079 (38.8%)	607 (5.8%)	97 (1%)	420 (4%)	5,203 (49.6%)
Uisburn Greater Urban Area	188 (1.8%)	0	2 (0.01%)	216 (2%)	406 (3.8%)
Castlereagh Greater Urban Area	1,628 (15.5%)	103 (1%)	43 (0.4%)	248 (2.4%)	2,022 (19.3%)
Carryduff	1,407 (13.4%)	119 (1.1%)	10 (0.09%)	76 (0.8%)	1,612 (15.4%)
Hillsborough & Culcavy	421 (4%)	25 (0.2%)	22 (0.2%)	44 (0.4%)	512 (4.9%)
Moira	545 (5.2%)	21 (0.2%)	0	151 (1.4%)	717 (6.8%)
Urban Settlement Total	8,268 (78.7%)				10,472 (99.8%)
Villages & Small Settlements	1,231 (11.7%)				1,231 (11.7%)
Countryside	729 (6.9%)				729 (6.9%)
Total Units	10,228 (97.4%)	875 (8.3%)	174 (1.7%)	1,155 (11%)	12,432 (118.4%)
Strategic Mixed Use site West Lisburn/Blaris	1,350 (12.9%)				1,350 (14.2%)
Total no of units	11,578	12,453	12,627	13,782	13,782
Total % of HGI	110.3%	118.6%	120.3%	131.3%	131.3%

Figures in brackets taken as percentage of 10,500 HGI figure taken from Housing Growth Study
 Villages and small settlements based on Housing Policy Areas and committed sites with planning permission
 Countryside based on building control completion notices over 5 years at an average of 54 Dwellings per year projected (excludes replacement dwellings)
 All figures have been reduced by 10% to take account of the potential non deliverability during plan period.

Figure 1: Extract from LDP Part 1 – Plan strategy – Page 64 – Chapter 4

¹ Part 1 Plan Strategy Chapter 4 Page 62

² Technical Supplement 1 - Housing Growth Study Para 4.8 details how it updated the 2012 based HGI through the use of 2016-based household projections and adjustments set out within the 2012 HGI methodology. It identified a new baseline future growth of 10,380 households over the Plan period (692 dwellings per annum). This was rounded up to 700 dwellings per annum equating to 10,500 dwellings for the plan period. A 10% oversupply allowance was added for potential that might not come forward bringing the total to 11,550

³ Updated based on data for three components, namely updated NISRA Household Projections, new Household Condition Survey data published by NIHE and more recent data from NISRA Central Survey Unit (as detailed in Housing Output Study para 4.11)

is concerned that there is a lack of distribution towards the village tier. Just 11.7% is allocated to the villages combined with the small settlements despite the villages alone (i.e. without the small settlements) having 12% of the Councils population in 2015⁴. A higher proportion of the housing allocation is more appropriate for the villages with the required reallocation from three areas:

- West Lisburn;
- Carryduff; and
- The Countryside.

The Housing Output Study Technical Supplement 1 provides the detail behind these calculations and the breakdown across the Council area. The table⁵ shows that Carryduff has the most ample supply with 82.3 years' worth of available land. This compares to 16.4 years for the villages and 16.6 years for Lisburn. This is not sustainable and detracts from the settlement hierarchy as proposed as well as failing to provide local residents with a sustainable choice across locations and price band.

Table 9.1 Housing land supply as of 31 March 2017

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

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

Source: LCCC

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

While there is no objection to the inclusion of housing at West Lisburn, it is unsustainable to prevent other settlement expansion because the capacity for 1350 units is being reserved for the West Lisburn site.

⁴ Para 4.15 Table 5: Settlement Hierarchy and Population 2015 Housing Output Study – TS 1

⁵ Lisburn & Castlereagh: Housing Growth Study Chapter 9 Meeting Future Housing Need Page 45

This is a significant area and will take many years to be delivered in part due to the need for the substantial contributions required the large area of open space and linear park and the engineering works associated with the new link road.

The Housing Output Study identified that: *This level of supply (referring to the 10,500 units figure) is dependent on the West Lisburn strategic site coming forward (supported by the West Lisburn Development Framework) to ensure the long term supply and the need for investment in the transport infrastructure to secure its future potential and refers to West Lisburn as 'a key area of future regeneration and growth which is a priority for the Council for the next 20 years'⁶. (Underlining my emphasis).*

The urban capacity study completed by Arup's sets out phasing assumptions for new sites (Technical Supplement 2 -Section 3.4.1.2, Page 22). The extract (Table 3) below assumes 3 years for sites without planning permission to come on line. Table 4 considers annual build out rates and indicates that for sites over 200 units a build out rate of 55 units per annum is considered robust. Using this analysis it would take a minimum of 3years for works to start on the West Lisburn site and 25 years for a full build out⁷.

3.4.1.2 Phasing assumptions

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

Table 3: Lead-in times

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

Table 4: Build out rates (residential)

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

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

⁶ Paras 5,14 and 515 of the Housing Output study – Technical Supplement 1

⁷ 1350 units divided by 55 per annum amounts to 24.5 years for full delivery

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

In addition, the Countryside Allocation of 729 units is significant, accounting for almost 7% of the total housing growth and is disproportionate to the population demographic and appears to conflict with the objective of focusing growth in urban areas. The RDS states that the role of the LDP is to "identify and consolidate the role and function of settlements" and refers to housing as a key driver of physical, economic and social change and emphasizes the importance of the relationship between the location of housing, jobs, facilities, services and infrastructure. As such the promotion of living in settlements rather than the open countryside ought to be reflected in the DPS.

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

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

The strategic objective A (4⁸) 'Support towns, villages and small settlements in the Council area as vibrant and attractive centers providing homes and services appropriate to their role in the settlement hierarchy whilst protecting their identity from excessive development' is potentially compromised through objective (8⁹); by allowing disproportionate growth in the countryside, while the focus should remain in the settlements.

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

C1 – Compliance with RDS

The RDS at Page 43 recognizes the need to manage housing growth to achieve sustainable patterns of residential development under RG 8. It also sets out that to sustain rural communities, new development should respect local, social and environmental circumstances. The Spatial Framework also provides guidance and priorities for development and infrastructural investment. Its guiding principle is putting the person at the centre to help understand their relationship with places. It notes that 'there needs to

⁸ Part 1 Chapter 3 – Plan Vision and Objectives Page 34

⁹ Support vibrant rural communities with appropriate opportunities for dwellings and sustainable development in the countryside.

be an understanding of how different places are influenced by the range of services and functions required by individuals, where they are located, how frequently they are used and by whom'. This will determine how people live, work and access services and in exploring the role and position of a settlement it recognizes that:

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

The plan makes no provision to sustain rural settlements¹⁰ with the proportion of growth disproportionate to the population living there.

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

As demonstrated previously the allocation is disproportionate to the Strategic Growth Objectives and population demographics and is not supported by the evidence base within the Technical Supplements 1, 2 and 6.

Remedy-The allocation needs to be adjusted to increase the amount of housing allocated to the village tier and in particular Milltown village.

Why Milltown is a sustainable Settlement

The RDS (Table 3.2, page 42), Housing Evaluation Framework sets out six tests to consider the distribution of future housing provision and how potential constraints on the future growth of a settlement are influential in the allocation of future development. Physical constraints that relate to the matters set out under the Resource, Environmental Capacity and Transport Tests and would include Wastewater treatment works capacities; and Local road network capacities.

Other constraints relate to the Urban and Rural Character and Community Services Tests and includes the ability of the landscape to absorb development, impact on environmental designations and the accessibility of new development to a settlement's services and facilities.

Milltown is the third largest village in the Council area with a population of 1,499 & 571 households (NISRA Headcount and Household Estimates for Settlements, March 2015).

¹⁰ The RDS, for the purpose of its spatial framework, identifies those places outside of the principal cities and the main and local hubs as constituting the rural area (paragraph 3.90, page 73). This consistent with the definition in the Rural Needs Analysis Paper.

The Countryside Assessment (Technical Supplement 6 Settlement Appraisal) indicates that it has

- An urban character to the centre and western portion of the village, with largely 1960s/70s housing on the south side of Derriaghy Road, and more modern developments on the north side. There are strong Industrial and Manufacturing jobs within close proximity to the Milltown area including the Cutts Industrial Estate, along with recent investment on Roads Infrastructure such as the North Lisburn Feeder Road and the ongoing works at the Old Golf Course Road close-by (the main route into Belfast and the wider network served via the M1).
- Located on the road between Belfast and Lisburn it is easily accessible and distanced approximately 3.5 miles from Lisburn City Centre. Three Ulsterbus services operate through the settlement - 530/531/532. Combined, the buses travel through 18 times a day Monday-Friday, 13 times on Saturday, and once on a Sunday. The nearest train station - Lisburn, is located approximately 4.2km away.
- There are a number of services/facilities within existing settlement limit (from west to east on Derriaghy Road) – gospel hall, commercial units, Masonic Hall, public house/restaurant, church hall, community hall, church. NI Water have advised there is 20% capacity in the Dunmurry catchment (includes Milltown, Lambeg & Tullynacross) remaining based on growth. (March 2019).

An additional allocation within Milltown would focus growth to service the surrounding rural area (rather than dilute settlement hierarchy through disproportionate high level of growth in the countryside). Taking cognisance of this knowledge the settlement limit for Milltown should include a modest rounding off to include sufficient lands to accommodating future housing need during the plan period. The most appropriate area that is free from environmental designation is to the west of the settlement as delineated by the blue arrow in Figure 4 – Extract from Countryside Assessment showing environmental designations.

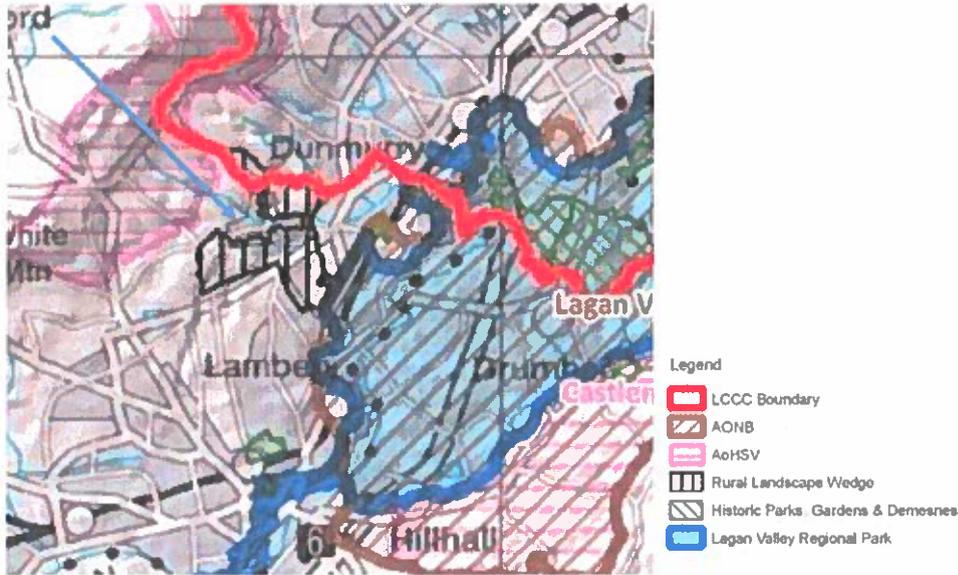


Figure 4: Context of west of settlement free of environmental designations

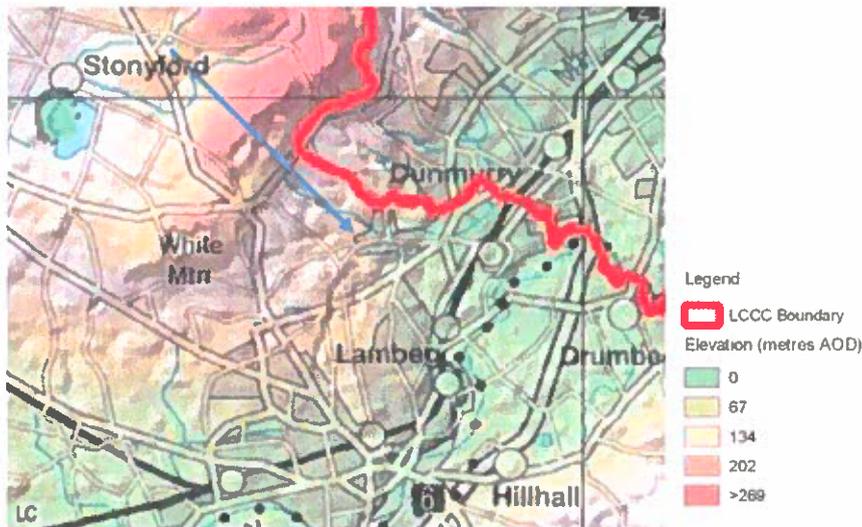


Figure 5- Extract Countryside Assessment¹¹ – Figure 2 showing elevation

This western area of the village is accessed via Old Park Road. As per Photo 1, the site comprises a small commercial/storage area with undeveloped agricultural land to the rear. It immediately abuts the SDL and while a small area crossing the access is within the LLPA, this is due to the river context and requires alteration to reflect the accurate vegetation cover. The remainder of the land is not subject to any protective or restrictive designations. This is the logical area for village expansion and is detailed on the aerial at Figure 6 with potential for a significant landscape buffer within the field to form a defensible boundary. An alternative access via a right of way from adjacent housing lands is also available.

¹¹ Lisburn Landscape Character review figure 2 topography – Ironside Fanfarr Report Technical Supplement 6



Photo 1 Lands fronting Oldpark, Milltown adjacent to SDL



Figure 6: Overview of Lands available for development to edge of proposed limit annotated with red star

The site provides a potential expansion opportunity for Milltown and is well located to tie into surrounding development lands and accommodate the future growth of this settlement in that;

- The lands immediately adjoin the limit, offering a logical expansion and rounding off to the settlement;
- There is a suitable means of access provided direct from the road.
- The front area of the site is flat and slopes away from the road
- It offers an opportunity to create a more sensitive edge of settlement buffer, with the potential to create a landscaped buffer within the field

We would ask that the above matters are taken as a representation to the dps housing allocation and look forward to the consideration of Milltown for further growth at the next stage of the process.

Yours Faithfully

Carrie McDonagh
Director