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Local Development Plan Team
Civic Headquarters
Lagan Valley Island
Lisburn
BT27 4RL

9th January 2020

Dear Sir/Madam

Lisburn and Castlereagh City Council Local Development Plan 2032 Draft Plan Strategy- October 2019

Quarryplan Ltd is instructed by its client to provide a response to the Lisburn and Castlereagh City Council ('LCCC') Local Development Plan (LDP) 2032 Draft Plan Strategy ('DPS') which is currently the subject of a public consultation.

Comments on the DPS and its soundness in relation to the tests as set out in the Department for Infrastructure's Development Plan Practice Note 6 (May 2017) are provided below. The representation describes how the Council's approach to housing policy is not considered sound due to a lack of flexibility. Our client has also identified lands for allocation of future housing development.

Background

Our client owns lands to the south of Ballinderry Road and east of Lissue Road, Lisburn. The lands amount to c.18.7ha in total and are comprised of agricultural fields, used for grazing. The lands are bound to the north by the Ballinderry Road, beyond which lies a Solar Farm. The Lissue Road bounds the site to the west, beyond which lie further agricultural fields. Lissue House (a Listed Building) lies adjacent to the site to the south east. The Lissue House site is identified in the DPS partly as a Site of Local Nature and Conservation Interest and partly as a Local Landscape Policy Area.

Further to the east of the site lies a range of employment-related developments at Ferguson Drive Industrial Estate. Residential development to the north of Ballinderry Road, off Woodbrook Avenue is located c. 200m to the north east of the site. The site has a c.880m frontage along Ballinderry Road. The site is located adjacent to the settlement limit for Lisburn City and is not identified for any particular use or purpose within the DPS. Lands to the east and south of the site are identified for employment uses within the DPS.

The site and its surroundings are shown in **Figure 1** overleaf held at **Appendix 1**. An extract from the LDP Plan Strategy Map Viewer is provided at **Figure 2** held at **Appendix 2**.

In order to complement the existing land uses in the surrounding area and provide an even supply of housing over the plan period, our client wishes to submit the site for consideration for the allocation of future housing within the LCCC LDP. As detailed later within this representation, the DPS is not

considered to sufficiently flexible to allow for the delivery of the required housing over the plan period. The proposed strategy is considered to stifle housing choice and is likely to impact affordability within the Council Area. The proposed housing strategy is also not considered to be realistic in terms of the scale and timescales for the delivery of housing at the Blaris Strategic site. The lands proposed for allocation by our client will provide an alternative approach to be adopted that will deliver housing growth in the short to medium term, improving choice and affordability in the local market and providing residential development which is within close proximity to existing and allocated employment uses, thereby increasing the likelihood of residents living and working within the Council Area.

Proposed Housing Strategy

Chapter 4 of the DPS describes how the designated settlement hierarchy for Lisburn and Castlereagh provides the basis for the framework upon which the Local Development Plan is devised. Lisburn City is at the top of the settlement hierarchy and as a result, will be the focus for future growth within the Council Area. Our client agrees with the hierarchy as set out within the DPS and support the approach of focusing development within Lisburn City.

In short, there is an identified future need for 10,500 dwelling units across the Council area. Currently, when taking account of existing commitments (i.e. existing planning permission and lands zoned for housing) and allowing for strategic housing growth to support the economic proposals at West Lisburn, there is a future potential of 11,578 dwelling units. The 11,578 dwelling units is comprised of 10,228 units from settlements and the countryside and a 1,350 at the Blaris Mixed Use Site.

The West Lisburn/Blaris is identified as a key area of future strategic growth which is a priority for the Council over the Plan period. The site is approximately 100ha of land proposed for development, with approximately half designated for employment uses. The designation includes the delivery of a link road between the M1 motorway and Knockmore/ Moira Road.

Proposed Strategic Housing Policy

Strategic Policy 08 relates to the housing in Settlements. The draft policy states that:

"The Plan will support development proposals that:

- a) are in accordance with the Strategic Housing Allocation provided in Table 3*
- b) facilitate new residential development which respects the surrounding context and promotes high quality design within settlements*
- c) promote balanced local communities with a mixture of house types of different size and tenure including affordable and specialised housing*
- d) encourage compact urban forms and appropriate densities while protecting the quality of the urban environment".*

A copy of table 3, as referenced in the policy is appended at **Appendix 3**.

The proposed Strategic Housing Allocation is considered **unsound** for a number of reasons as set out below.

The delivery of the housing at Blaris is not guaranteed. The delivery is reliant upon securing funding in order to deliver the Knockmore Link Road, required to realise the potential of the allocation. Therefore if funding for the link road was not available, a scenario may arise which would see the 1,350 dwellings proposed for the area unable to be delivered.

If funding can be obtained for the delivery of the link road, due to the nature of the strategic mixed use allocation and the reliance of the allocation upon the delivery of the link road, delivery of the envisaged housing/employment growth is considered to be a long term option. The delivery of the

link road will take a number of years to implement and only at that stage will the potential for housing delivery be possible.

Given the above, the 1,350 units envisaged in Table 3 will not be delivered until the final years of the plan period. As a result, a significant rate of housebuilding will be required during the latter years of the plan period. It is a realistic prospect that in order to meet the envisaged delivery for the plan period, that housebuilding at the site may be required at a rate of 250/300 units per annum. Such a rate is not considered realistic, with no evidence of such a rate being previously achieved within Northern Ireland.

The proposed approach as set out in the DPS therefore runs the risk of not being able to deliver the envisaged housing within the plan period.

The approach is also considered to be flawed as it will limit choice in the market in the short and medium term. The Housing Growth Study Evidence Paper which supports the DPS states that to address future housing needs, the LDP should facilitate a reasonable mix and balance of housing tenures and types including smaller house types for a growing elderly population and 1-2 person households.

Much of the committed units referenced in Table 3 have been granted planning permission already and therefore there is no mechanism for the delivery of the specified required house types. With no new sites being brought forward within the LDP, other than at Blaris, the supply of housing is constrained to the existing commitments until such times as development at Blaris can come forward.

The DPS and supporting evidence papers discuss how the Council Area is a strong housing market area with high demand and high house prices compared to other local government districts in Northern Ireland. Given the likely constraint in supply to the latter years of the plan period as referenced above, if demand trends are to continue, affordability within the Council Area is likely to prove a significant housing market issue.

The DPS describes how providing jobs aligned with future housing is an important consideration for the Council area, to enable future residents to live and work in Lisburn and Castlereagh. The allocation at Blaris is based upon the delivery of new employment developments. Again, this is dependent upon the delivery of the link road and may take several years in order to gain the necessary permissions and deliver. The delivery of new housing in the Council Area should be in areas which are in close proximity to existing employment opportunities (in order to meet short term needs) and lands for future employment development (to provide employment opportunities in the longer term). The designation at Blaris is reliant upon the delivery of new employment opportunities which may not coincide with housing delivery, therefore increasing the likelihood of residents commuting out of the Council area.

As a result of the above, the proposed strategy is not considered to be coherent, realistic or reasonably flexible and as result, the proposed policy is considered to fail to comply with Soundness Tests CE1, CE2 and CE4.

The Sustainability Appraisal/ Strategic Environmental Assessment ('SA/SEA') for the DPS is required to consider all reasonable alternatives. No alternative appears to have been considered which would see the delivery of housing in close proximity to existing employment allocations in the shorter and medium term as an alternative to the longer term strategic option at Blaris. The proposed policy is therefore also considered to fail to comply with Soundness Test P3 as it has not been the subject of an adequate SA/SEA.

It is suggested that an amended policy approach should be investigated which would allow for housing delivery at the proposed allocation lands as identified above.

The DPS references the importance of a mix of housing and employment uses, which would contribute to ensuring future needs can be met within the Council area and support job growth. The

proposed allocation lands identified above are within close proximity to existing and proposed employment lands. Allocation of the lands at Ballinderry Road would allow for short term and longer term linked living and working aspirations to be met. Development of the lands for housing will also improve choice and affordability in the local housing market in the short and medium term and avoid the pressure of delivery within a short time frame at Blaris towards the end of the plan period.

The allocation would not prevent the strategic mixed use site at Blaris coming forward but would instead provide a suitable and sustainable, short and medium term option which would allow for suitable housing growth within the primary settlement as identified in the settlement hierarchy.

Conclusion

Quarryplan Ltd is instructed by its client, [REDACTED], to provide a response to the LCCC Local Development Plan DPS which is currently the subject of a public consultation. The DPS seeks to achieve housing growth via existing commitments and the delivery of 1,350 new homes at the strategic mixed use site at Blaris. The approach is considered flawed as:

- The delivery of the housing is dependent upon securing funding for the implementation of a new Link Road;
- The delivery of new housing will not be until the end of the plan period, therefore constraining choice and affordability in the short and medium term; and
- Any delay in delivering the link road will be likely to result in unrealistic rate of delivery for the end of the plan period.

The DPS references the importance of a mix of housing and employment uses, which would contribute to ensuring future needs can be met within the Council area and support job growth. The proposed strategy is based around the uptake of new employment developments rather than a mix of existing and proposed.

As a result of the above, the proposed strategy is not considered to be coherent, realistic or reasonably flexible and as result, the proposed policy is considered to fail to comply with Soundness Tests CE1, CE2 and CE4.

The proposed policy is also considered to fail to comply with Soundness Test P3 as it has not been the subject of an adequate SA/SEA.

In order to complement the existing land uses in the surrounding area and ensure an even supply of housing growth over the plan period, our client wishes to submit a site at Ballinderry Road for consideration for the allocation of future housing within the LCCC LDP, which would assist in addressing the above issues.

I trust the above is clear, however if you require any further details please don't hesitate to contact me.

Yours faithfully,

[REDACTED]

Appendix 1

Proposed Allocation Lands- Site and Surroundings



Notes: Aerial imagery provided via Bing Maps

Legend

 Proposed Allocation Lands

	
Contains OS Data © Crown copyright and database right 2018.	
Title: Proposed Housing Allocation, Ballinderry Road, Lisburn	
Scale: 1:5,000 @A4	
Dwg. No. Figure 1.0	
Drawn By: CST	Date: 06/01/2019

Appendix 2

LDP Plan Strategy Map Viewer Extract

Figure 2- LDP Plan Strategy Map Viewer Extract



Appendix 3

LCCC Draft Plan Strategy- Table 3 Strategic Housing Allocation over Plan Period

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
Lisburn City	4,079 (38.8%)	607 (5.8%)	97 (1%)	420 (4%)	5,203 (49.6%)
Lisburn 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%)
Moirs	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.



Local Development Plan 2032
Draft Plan Strategy
Representation Form

Please complete this representation form online and email to LDP@lisburncastlereagh.gov.uk or alternatively print and post a hardcopy to:-

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

All representations must be received no later that 5pm on the 10th January 2020

SECTION A: YOUR DETAILS

Please tick one of the following:-

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

First Name

Last Name

Details of Organisation / Body

Address

Postcode

Email Address

Phone Number

Consent to Publish Response

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 statement detailed in Section C.

- Please publish *without* my identifying information
- Please publish with only my Organisation
- Please publish with my Name and Organisation

SECTION B: YOUR REPRESENTATION

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.***

What is your view on the Plan Strategy?

- I believe it to be **SOUND**

If you consider the Draft Plan Strategy to be **sound**, and wish to support the Plan Strategy, please set out your comments below:-

(If submitting a hardcopy & additional space is required, please continue on a separate sheet)

OR

I believe it to be **UNSOUND**

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

IF YOU WISH TO SUBMIT ANY FURTHER REPRESENTATIONS, PLEASE COMPLETE SECTION B FOR EACH INDIVIDUAL ISSUE

Part 1 – Plan Strategy

- Chapter 1 - Introduction
- Chapter 2 - Policy & Spatial Context
- Chapter 3 - Vision & Plan Objectives
- Chapter 4 - Strategic Policies and Spatial Strategy
- Chapter 4A - Enabling Sustainable Communities & Delivery of New Homes
- Chapter 4B - Driving Sustainable Economic Growth
- Chapter 4C - Growing our City, Town Centres, Retailing & Other Uses
- Chapter 4D - Promoting Sustainable Tourism, Open Space, Sport & Outdoor Recreation
- Chapter 4E - Protecting & Enhancing the Historic & Natural Environment
- Chapter 4F - Supporting Sustainable Transport & Other Infrastructure
- Chapter 5 - Monitoring & Review

Part 2 –Operational Policies

- Operational Policy (Please State Individual Policy using Policy Reference e.g. HOU 1)

SOUNDNESS TEST:

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)

- P1 Has the Plan Strategy been prepared in accordance with the council's timetable and the Statement of Community Involvement?
- P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?
- P3 Has the Plan Strategy been subject to sustainability appraisal including Strategic Environmental Assessment?
- P4 Did the Council comply with the regulations on the form and content of its Draft Plan Strategy and procedure for preparing the Draft Plan Strategy?
- C1 Did the Council take account of the Regional Development Strategy?
- C2 Did the Council take account of its Community Plan?
- C3 Did the Council take account of policy and guidance issued by the Department?
- C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?
- CE1 Does the Plan Strategy set out a coherent strategy from which its policies & allocations logically flow & where cross boundary issues are relevant it is not in conflict with the Plan Strategies of neighbouring councils?
- CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?
- CE3 Are there clear mechanisms for implementation and monitoring?
- CE4 Is it 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.

The DPS seeks to achieve housing growth via existing commitments and the delivery of 1,350 new homes at the strategic mixed use site at Blaris. The approach is considered flawed as:

- The delivery of the housing is dependent upon securing funding for the implementation of a new Link Road;
- The delivery of new housing will not be until the end of the plan period, therefore constraining choice and affordability in the short and medium term; and
- Any delay in delivering the link road will be likely to result in unrealistic rate of delivery for the end of the plan period.

The DPS references the importance of a mix of housing and employment uses, which would contribute to ensuring future needs can be met within the Council area and support job growth. The proposed strategy is based around the uptake of new employment developments rather than a mix of existing and proposed. As a result of the above, the proposed strategy is not considered to be coherent, realistic or reasonably flexible and as result, the proposed policy is considered to fail to comply with Soundness Tests CE1, CE2 and CE4.

The proposed policy is also considered to fail to comply with Soundness Test P3 as it has not been the subject of an adequate SA/SEA.

See accompanying Representation for full details.

MODIFICATIONS

If you consider the Plan Strategy to be **unsound**, please provide details of what changes you consider necessary to make the Plan Strategy sound.

Allocations of lands at Ballinderry Road for Housing Development- see full details in accompanying representation.

(If submitting a hardcopy & additional space is required, please continue on a separate sheet)

I wish to attach supporting information with my representation e.g. map

IF YOU WISH TO SUBMIT ANY FURTHER REPRESENTATIONS, PLEASE COMPLETE SECTION B FOR EACH INDIVIDUAL ISSUE

SECTION C: DEALING WITH YOUR REPRESENTATION

Please indicate how you would like your representation to be dealt with.



Written Representation



Oral Representation

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.

SECTION D: DATA PROTECTION

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

It should also be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure (DfI) as they will be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the privacy section at www.lisburncastlereagh.gov.uk/information/privacy

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

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

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

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

Signature

Date