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09 January 2020

Our Ref: NEP1001

Dear Sir/Madam,

**LDP 2032 – RESPONSE TO DRAFT PLAN STRATEGY
 PROPOSED MIXED USE NEIGHBOURHOOD AND MI-KNOCKMORE LINK ROAD AT BLARIS
 LANDS, LISBURN**

I refer to publication of the LDP 2032 draft Plan Strategy (dPS) and now write on behalf of our client, Neptune Carleton LLP, to support the strategic mixed use designation incorporating major employment and housing at West Lisburn/Blaris.

Notwithstanding our client's broad support there are a number of elements of the Plan which require revision to make it more sound and reflective of a robust evidence base and this representation seeks to be helpful in setting out the revisions we consider should be made.

Background

Neptune Carleton LLP has assembled and control substantial lands at Blaris, West Lisburn where sustainable, strategic housing and employment growth, related community and local retail uses, extensive new public open spaces including riverside parkland and the key piece of infrastructure required to unlock the development potential of West Lisburn and Maze Long Kesh, the 1.6km MI-Knockmore link road, are all proposed.

At the time of writing, our client is very advanced with two major planning application processes that apply to both a full planning application for the MI-Knockmore link road (Application ref. LA05/2018/1155/F) and for an outline planning application for a major mixed use neighbourhood (Application ref. LA05/2018/1154/O) extending to an application site area of some 111.7 hectares.

These applications are being targeted for determination by LCCC's planning committee in the first half of 2020. Assuming planning permission is secured a construction start to the M1-Knockmore link road will commence before the end of this year and be complete around mid-2022.

Reserved matters applications/full planning applications for first phase development will be brought forward and it is reasonable to expect initial housing occupation in and around the time that the link road becomes operational.

These are both EIA development and have been the subject of PAN, PAD, PACC and further environmental submissions after extensive and collaborative discussions with LCCC, DfI Roads and a range of other statutory consultees and stakeholders including Maze Long Kesh Partnership.

Previously agreed Development Frameworks for Blaris, West Lisburn

The mobilisation of these planning applications follows on from a previously agreed Development Framework (2011) for the lands at Blaris after 18 months of close collaborative working between DoE Planning, Lisburn City Council, DRD Roads, NIEA, Translink, SIB and the then site promoters, Blaris Development Partnership.

That followed agreement between the Blaris Development Partnership and DoE Planning/DRD at the BMAP Inquiry of December 2008/2009 on the extent and distribution of development at Blaris, West Lisburn.

It also reflects LCCC's own endorsement in their West Lisburn Development Framework 2015 which was in very large part informed by that agreed previously by DoE Planning. It was one of the first publications the new Council initiated following the transfer of planning powers.

That recognizes that the overall location should have a sustainable balance of strategic scale housing and employment uses.

It reflects the importance of the M1-Knockmore link road in enhancing strategic transport movement around Lisburn, in facilitating sustainable economic and housing development in this location and in providing a future opportunity for infrastructure linkages to be extended from the M1-Knockmore link road further to the west to allow the potential of the regionally important Maze Long Kesh (MLK) site to be realised.

The design of the M1-Knockmore link road embeds the opportunity for a future road link to MLK to the west and connection to the strategic highway network from an arm of the proposed first roundabout of the M1-Knockmore link road from the south.

Strategic Housing and Employment Growth

We welcome the draft Plan Strategy's identification of 1350 units to be directed to the Blaris Strategic Mixed Use Designation over the plan period to 2032. The scale of the overall Blaris opportunity is such that it will straddle both this plan period to 2032 and the next Plan period.

The Plan suggests that the Blaris location could absorb up to 1500 units. The overall level of housing when complete across the Blaris strategic mixed use designation is more realistically of the order of some 2300 dwellings.

This will inevitably make an important contribution to this Local Development Plan and its successor LDP. It is likely that the overall development at Blaris will span a 20 year development cycle assuming a start before the end of 2020.

SMU01/Map 7

We note the content of the proposed SMU01 strategic policy text and the corresponding plan on its facing page, Map 7.

This requires an overall concept masterplan incorporating a transport assessment to be agreed with the Council and suggests a range of elements that this should outline.

Proposed development that has been the subject of a comprehensive masterplan process and that demonstrates that it will not prejudice the future development of the balance of the lands should not be held up awaiting production of an overall concept masterplan for all of the West Lisburn/Blaris strategic site.

Determination of the advanced planning applications weighing the local development plan with all other material considerations will be a matter for LCCC's planning committee. No weight can be attributed to the draft Plan strategy until it has been tested through an Independent Examination.

SMU01 defines specific uses that are deemed appropriate on the site. This list is unnecessarily restrictive and should be expanded to allow for hotel, café, restaurant and related sui generis uses that have previously been accepted and agreed in the Development Frameworks agreed for the site.

The map suggests that there should be no development further to the west than the alignment of the M1-Knockmore link road. That is not sound and is not founded on a robust evidence base. That is contrary to the soundness test of coherence and effectiveness (CE2).

It does not have proper regard to the extent of the River Lagan floodplain at Blaris (see revised Design and Access Statement, October 2019, page 30-31 extract attached) which provides the natural and effective containment to the western expansion of the city in this location and creates the opportunity for double fronted development to the proposed link road.

The floodplain is a constraint that presents a logical physical edge to the expanded urban area of Lisburn in this location which is reinforced by the presence of existing mature woodland to the north of Blaris Road. The masterplan/design and access statement that underpins the proposed new mixed use neighbourhood reinforces this established landscape character with substantial new woodland planting.

It is to this defined constraint that the development limits of the city in this location were endorsed by DoE Strategic Projects, Lisburn City Council (as it then was) and all stakeholders in confirming a Development Framework for the lands in March 2010.

That principle of development extent was further reinforced by LCCC in their own vision for the city articulated within its 2015 West Lisburn Development Framework. It was further identified in its Preferred Options Paper of March 2017 and is again referenced in its draft Plan strategy issued in October 2019.

This natural constraint represents the logical western extent of the Blaris strategic mixed use designation lands where efficient use of the existing capacity of the land should be made to achieve sustainable economic growth in this location.

Securing a major mix of land uses at Blaris which includes lands to the west of the road within our client's control and to the defensible floodplain extent is vital to realise the necessary value in the land and contribute towards the funding of the expensive infrastructural cost of the 1.6 km M1-Knockmore link road including a bridge over the River Lagan.

The extent of the site within the draft Plan Strategy should reflect the extent of lands that have been the subject of technical and environmental impact assessment as part of applications LA05/2018/1154/O and LA05/2018/1155/F. This should include lands shown on the phasing plan attached notably E1, E4, R3 and the neighbourhood gateway (NG) either side of the M1-Knockmore link road.

The neighbourhood gateway comprises important developable lands to the east and west of the M1-Knockmore link road north of the River Lagan. These lands have previously been endorsed for mixed use development in both the 2011 DoE Development Framework for the Blaris lands and in LCCC's 2015 Development Framework.

Their development for mixed use development is equally vital in realising the necessary funds to deliver the M1-Knockmore link road.

Map 7 is overly restrictive in applying its proposed LLPA/Linear Park notation. There is a very extensive riverside park (RP - Phasing plan) proposed as part of the mixed use new neighbourhood (LA05/2018/1154/O). The extent of the LLPA ignores the agreement previously reached on this matter with Landscape Branch and DoE at the BMAP Inquiry and through the endorsed Blaris Development Framework.

The provision of the M1-Knockmore link road is central to unlocking the growth of Lisburn city at West Lisburn and in facilitating development at Blaris and in enhancing the infrastructural network to facilitate a future road link to Maze Long Kesh.

LCCC has made clear its ambition to see early delivery of the M1-Knockmore link road which it has prioritised as the key piece of infrastructure to unlock the wider West Lisburn/Blaris potential.

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The applicant is committed to entering in to a section 76 agreement with LCCC to secure the necessary obligations to assist in delivering the M1-Knockmore link road but also to ensure that the wider development of the area will be secured in a comprehensive, fair and equitable manner and that there will be connectivity of roads and service infrastructure in a phased and orderly manner.

The proposed M1-Knockmore link road reflects the alignment of the M1-Knockmore link road that is protected through the draft BMAP and the BMTP.

The concept masterplan (see attached) for the proposed new strategic mixed use Blaris neighbourhood closely reflects the Council's own vision for the area as adopted in its West Lisburn Development Framework 2015 and that previously agreed by DoE, DRD and an extensive range of wider stakeholders in 2011.

We trust the suggested revision to the draft Plan Strategy assist to make it more sound and reflective of a robust evidence base.

Yours sincerely,

Director

Enc.

Utilities Infrastructure

9.23 An assessment of existing infrastructure has been undertaken to understand baseline conditions relating to electricity, gas, water and telecommunications.

Electricity

9.24 NIE has confirmed that a number of 11kv overhead lines cross the site as well as a 33kv overhead line. As the development proposal progresses to reserved matters stage discussions will continue with NIE to determine optimum solutions and overruns. It is however anticipated that any new NIE lines will run along the existing or proposed new roads within the proposed development to minimise environmental impacts.

Gas

9.25 Prognosis Gas has confirmed that they have existing services running along the Moira and Knockmore Roads. Firms Gas has confirmed they do not have a plant in the location and that Blaris lies outside of their license area.

Water

9.26 Confirmation of the location of existing NI water and foul mains has been received. There are four mains to the east and west of the site and there are a number of water mains traversing the site.

9.27 A network capacity test has identified that the site can be connected to the existing 400mm diameter watermain located adjacent to the site. There is no requirement for reinforcement of the existing network to service this development.

9.28 Construction of the wider development will involve phased development overall a 15-20 year construction period. All of the internal road network will have appropriate NI Water apparatus installed to facilitate the requirements of the wider development.

Telecommunications

9.29 There are existing BT cables within the development area particularly along Blaris Road. The provision of telecommunications will generally be placed underground with ducts following the routes of the internal road network.

Key	
	Application Boundary
	Settlement Boundary
	Existing Trees
	Existing Hedgerows
	Existing Watercourse
	Floodzone
	Pipeline
	Overhead Powerlines
	Local Landscape Policy Area
	Site Of Local Nature Conservation Importance
	Place Of Community Importance
	Monuments
	Park And Ride
	Proposed Alignment of the Mt-Knockmore Link Road

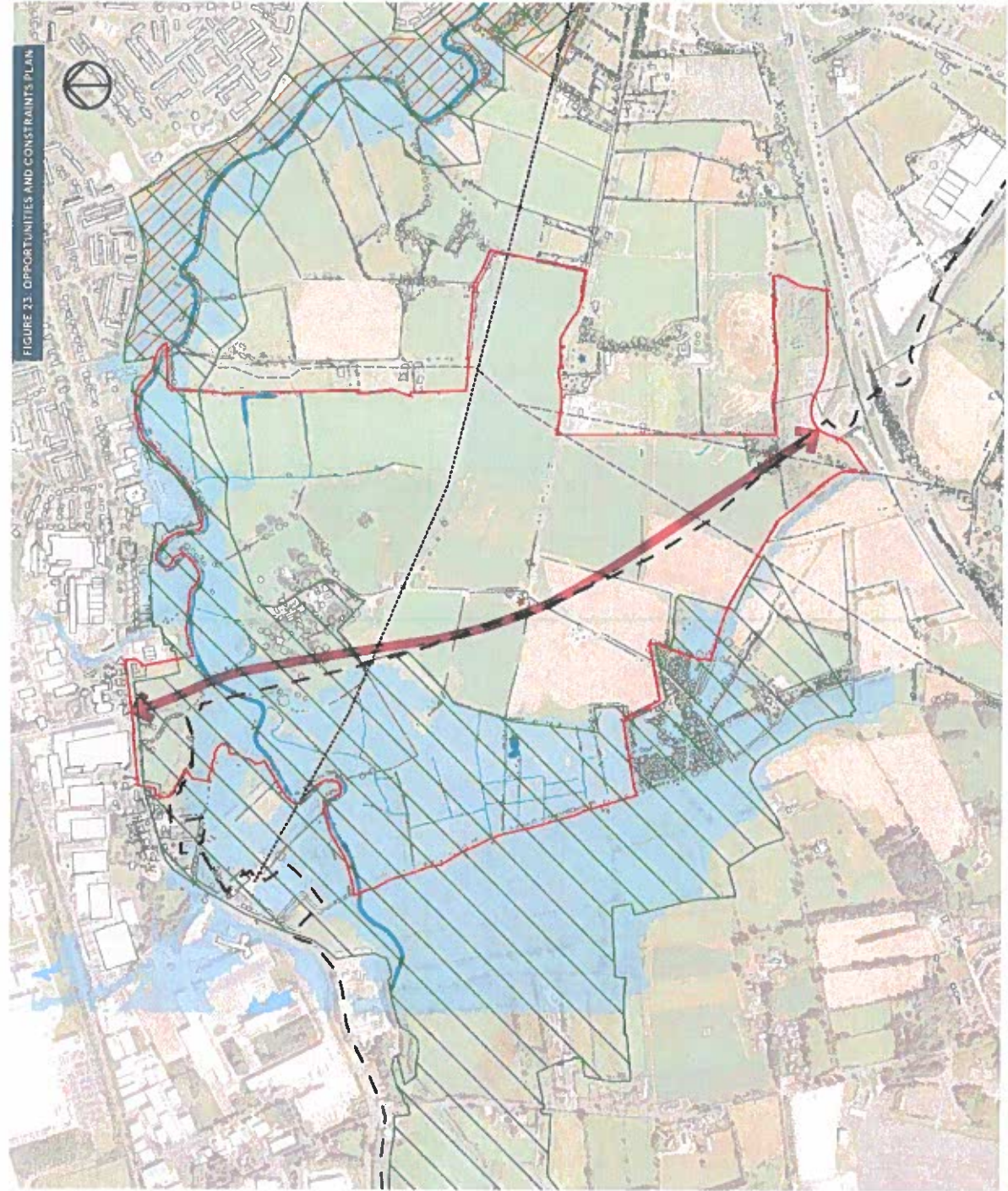


FIGURE 23. OPPORTUNITIES AND CONSTRAINTS PLAN

15.0 ILLUSTRATIVE MASTERPLAN

Description Summary

15.1 The masterplan (see Figure 41) has responded to the opportunities and constraints identified during the assessment and evaluation process

15.2 In summary this includes:

- Alignment of the MKLR / bridge
- Realignment of Blaris Road
- Accommodating existing services infrastructure
- Drainage strategy
- Access strategy
- Landscape strategy

15.3 The wider masterplan covering the WILDF area (see Figure 41) indicatively provides the following:

- c. 2300 homes in total, with some 1500 within the mixed use application boundary
- c.1.5m sqft of employment floorspace in total with some 754,000 sqft within the mixed use application boundary
- Commercial Area / Neighbourhood Centre within the mixed use application boundary
- Parkland and open spaces
- P&R

Key Features

- 1,300 homes
- 754,000 sqft of employment floor space
- ① Commercial Area / Neighbourhood Centre / Blaris Road High Street
- ② Northern Gateway Mixed Use Area with Commercial Areas and Housing
- ③ Opportunity site for Gateway / Signature Building
- ④ Business accommodation (Bla-Bla [B1c])
- ⑤ Hotel (c.200 bed)
- ⑥ Expanded P&R (minimum of 700 spaces)
- ⑦ Connection to potential MLK Link Road



FIGURE 41: ILLUSTRATIVE MASTERPLAN

Key

- Potential Connection to Warbur Landis
- Road Designed to Distributor Standard for Future Connection to Road

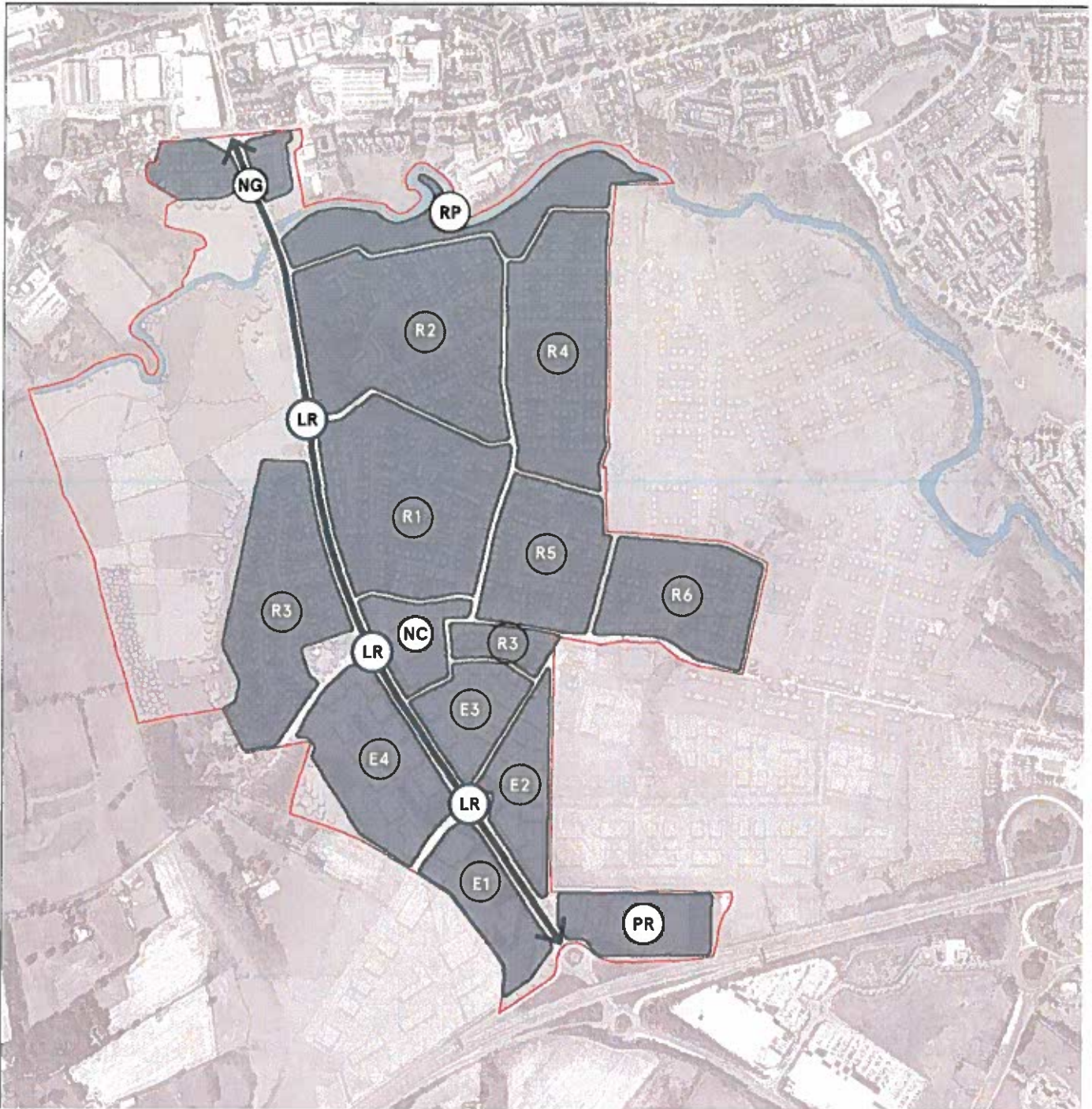


Table 8: Indicative Phasing Plan

Infrastructure Phase	Residential (R) Phase	Approximate Units	Employment (E) Phase	Neighbourhood Centre (NC) and Northern Gateway (NG) Phase	River Park (RP) Phase	Indicative Timescale
MKLR & P&R						2020-2021
	R1	c. 200	E1			2020-2023
	R2	c. 275	E2			2012-2027
	R3	c. 275				2024-2030
	R4	c. 150	E3	NC / NG	RP	2028-2031
	R5	c. 250	E4			2028-2034
	R6	c. 150				2031-2036

Project
Blaris Lisburn
 Drawing Title
Phasing Plan

Date: 13-11-19 Scale: N.T.S. Drawn by: HJ Check by: MW
 Project No: 26649 Drawing No: ind29 Revision: -



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