

LISBURN AND CASTLEREAGH LOCAL DEVELOPMENT PLAN 2032

Draft Plan Strategy Representation

Strategic Policy 08 and HOU10

Glenavy

Lotus Homes (UK) Ltd.

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A Representation to Lisburn and Castlereagh City Council’s Draft Plan Strategy (Local Development Plan 2032)

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1. Introduction

1.1 This representation has been prepared by **TSA Planning** on behalf of our client **Lotus Homes (UK) Ltd.**, in respect of Lisburn and Castlereagh City Council's published Draft Plan Strategy (DPS), for their Local Development Plan 2032.

1.2 The paper assesses Strategic Policy 08 and Policy HOU10 within the Draft Plan Strategy including the associated amplification text which we believe is **unsound** in its current form.

1.3 To inform this response to the Draft Plan Strategy, consideration is given to the legislative requirements relating to the preparation, form and content of the Local Development Plan set out in the Planning Act (NI) 2011 and The Planning (Local Development Plan) Regulations (NI) 2015. Consideration is also given to the following Policy and Guidance publications, along with the wider content of the Draft Plan Strategy (including accompanying assessments and technical supplements):

- The Regional Development Strategy (RDS) 2035;
- The Strategic Planning Policy Statement (SPPS);
- The Department's Development Plan Practice Notes (DPPN); and in particular:
 - DPPN 6 - Soundness; and
 - DPPN 7 - The Plan Strategy.
- LDP Technical Supplement 1: Housing Growth Study;
- LDP Technical Supplement 2: Urban Capacity Study; and
- LDP Settlement Appraisals (Appendices 2 of LDP Technical Supplement 6: Countryside Assessment)

Regard is also had for the Preferred Options Paper stage, the LDP Timetable, and the Council's Community Plan 2017/2032.

1.4 **Section 2** of the paper analyses Strategic Policy 08 in respect of Housing in Settlements, including the Council's Housing Growth figure, and all associated text, setting out why we currently believe these to be unsound; and sets out the appropriate evidence and changes required to ensure the DPS is sound.

1.5 **Section 3** relates to the Council's Strategic Housing Allocations identified within Table 3 of the DPS.

1.6 **Section 4** assesses Policy HOU10 Affordable Housing in Settlements and associated amplification text.

1.7 **Section 5** identifies and assesses potential housing lands within Glenavy.

1.8 **Section 6** sets out Conclusions in respect of this representation.

1.9 We respectfully request this representation is heard by **oral hearing** at Independent Examination stage.

2. **DPS Part 1: Strategic Policy 08 Housing in Settlements – Strategic Housing Allocation Figure**

2.1 Summary

- 2.1.1 Within Strategic Policy 08 the Council have set out a Strategic Housing Allocation figure of 11,550 new dwellings over the Plan period, plus an additional c.1,500 dwellings at the strategic mixed-use site at West Lisburn/Blaris. The figure of 11,550 dwellings is currently unsound, particularly as it places inappropriate onus on past population trends as identified at **Table 1** and our detailed summary below.

Table 1: Summary of Relevant Soundness Tests

| |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Soundness Test C1 – Did the Council take account of the RDS</i> |
| The Council have commissioned their own HGI figure prepared by Lichfields, which is based on 2016 household projections. However, as per the HGI figures published by the Department, these are based on recent trends and assume that these trends will continue into the future. The figure projected by Lichfields is stated as being irrespective of the direction of future policies and strategic aspirations. As such, the HGI figure identified by Lichfields, should be used in the same way as the published HGIs. To this end, the RDS identifies at RG8 that the HGI figures should not be seen as a rigid framework but guidelines for local planning. |
| <i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i> |
| Paragraph 6.136 of the SPPS states that the policy approach in respect of housing in settlements must be to facilitate an adequate and available supply of quality housing to meet the needs of everyone. The Council’s Strategic Housing Allocation figure is currently too stringent as it solely focuses on past population trends and is therefore likely to result in an inadequate provision of housing lands over the Plan period. Furthermore, in correspondence relating to the recently published revised HGI figures (September 2019), the Department have indicated that other local evidence should be considered in determining the amount of housing land required, which has not been undertaken by LCCC. |
| <i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i> |

The Strategic Allocation figure is currently too restrictive and as such is inappropriate. All forms of local evidence have not been considered by the Council.

Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances

Although the Council have increased their original Strategic Housing Allocation figure by 10% to 11,550 dwellings, in order to allow for the non-delivery of some housing sites, flexibility has not been afforded in respect of changing social or economic circumstances in the future which may impact upon housing demand and delivery.

2.2 Detailed Response

Department for Infrastructure 2016 based Housing Growth Indicators

- 2.2.1 In September 2019, the Department for Infrastructure (DfI) published revised, 2016 based, Housing Growth Indicators for each of the 11 Council Areas. In respect of Lisburn and Castlereagh, this figure is 713 dwellings per annum, a reduction from 739 dwellings per annum previously published in 2016. Despite this reduction, the Council's housing growth figure of 700 dwellings per annum represents a further reduction than both figures identified by the Department. This indicates that the figure used by the Council could result in an under provision of housing lands over the Plan period.
- 2.2.2 In correspondence to Heads of Planning (Councils), DfI stated that the identified HGI's assume that recent trends will continue into the future and do not attempt to model existing policy or societal factors. Furthermore, the figures do not predict the impact of future policies, changing economic circumstances or other future events which may impact housing requirements. As such, the Department advise that other relevant local evidence should be considered and LDPs must aim to make provision for an appropriate housing requirement following analysis of all relevant sources of evidence. This includes evidence in respect of recent build rates, which for Lisburn and Castlereagh, DfI state as being 772 dwellings per annum (2015-18) within the revised HGI document (September 2019).

Housing Growth Study

- 2.2.3 Within the Council's evidence, Lichfields have caveated that their projections are calculated irrespective of future policies and strategic aspirations. The figure they identify is based on 2016 household projections and the study acknowledges that the Department are currently calculating their own 2016 based figures, which were not available at the time of writing. As

identified above, these figures have since been published and are higher than those projected by Lichfields.

- 2.2.4 We acknowledge that Lichfields have compared their projections to historic build rates from 2005-2017, which average at 618 dwelling per annum. However, this average covers a time period of deep economic recession and a depressed residential market. As such, more recent build rates of 772 dwelling (2015-18), which stills falls significantly below that of 2005/05/07 are appropriate for consideration.
- 2.2.5 Finally, Para. 6.29 of the Lichfields Housing Growth Study states "...the fact that the HGI figure of 692 dpa is broadly aligned with past trends indicates that this level of growth is entirely achievable over the forthcoming Plan period". However, Para. 4.15 also identifies that falling completions have resulted in a shortfall in housing delivery against the estimated future need. This has served to create a situation of undersupply, which has exacerbated market pressure. This has led to high house prices and an increased reliance on the private rented sector. We can therefore conclude from this evidence that a housing growth figure which is aligned too closely with past trends has the potential to further negatively impact upon affordability across the Council area. This is supported by Lichfields, who state at Para. 4.16 of their Housing Growth Study "The evidence of market pressure in Lisburn & Castlereagh implies there is a need for more housing and there is evidence that basing the future requirement solely on the official projections may not be sufficient to deal with the housing challenge that exists in Lisburn & Castlereagh". Despite this evidence presented by Lichfields, the Council have solely based their Strategic Housing Allocation on the projections advised by Lichfields, with a minimal 10% increase to counteract non-delivery. This approach is not appropriate or reasonably flexible as it does not account for changes in societal or economic circumstances.
- 2.2.6 Taking account of the above, the Council's identified Strategic Housing Allocation of 11,550 dwellings is too low when considering what is appropriate in respect of the most up to date evidence base. Therefore, we have calculated an updated Strategic Housing Allocation taking an average of the recently published HGI figure (713 dwellings per annum) and recent build rates (772 dwellings per annum). This equates to a figure of 743 dwellings per annum and a total figure of 11,145 dwellings when projected over the Plan period. Similar to the Council's approach, this has then been increased by 10% to 12,260 dwellings to allow for non-delivery of sites.
- 2.3 Changes to the Draft Plan Strategy
- 2.3.1 Based upon the above commentary, we respectfully suggest the following amendments are made to ensure the Plan Strategy is Sound, as detailed in **Table 2**.
- *Amendment 1:* Amend the Strategic Housing Allocation figure at Page 58 of DPS Part 1 from 11,550 dwellings to 12,260 dwellings

Table 2: TSA suggested changes in relation to tests of soundness

| |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><i>Soundness Test C1 – Did the Council take account of the RDS</i></p> <p><i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i></p> |
| <p>In line with guidance set out in Policy RG8 of the RDS, the SPPS and the Department, the above amendment has used the recently published HGI figure as a starting point for determining the level of housing growth across the Council area and has also incorporated local evidence in the form of recent build rates to determine the final growth figure.</p> |
| <p><i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i></p> |
| <p>The amendment considers the relevant evidence available and provides a realistic and appropriate growth figure.</p> |
| <p><i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i></p> |
| <p>The uplifted Strategic Housing Allocation provides appropriate flexibility in respect of changing social/economic circumstances as well as a 10% increase to allow for the non-delivery of sites.</p> |

3. DPS Part 1: Strategic Policy 08 Housing in Settlements – Allocation to Settlements

3.1 Summary

3.1.1 Table 3 of the DPS sets out the Council’s Strategic Housing Allocation between settlements over the Plan Period (**TSA 1**).

TSA 1: Council’s 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 & Cuckavay | 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% |

3.1.2 The allocation of housing between settlements, as shown above, is fundamentally flawed and as such is unsound, as it does not set out a clear strategy for the distribution and allocation of housing between settlement tiers, informed by the settlement hierarchy, function and the evidence base. This is discussed further at **Table 3** and our detailed response below.

Table 3: Summary of Relevant Soundness Tests

Soundness Test C1 – Did the Council take account of the RDS

Policy RG8 of the RDS 2035 requires the management of housing growth to achieve sustainable patterns of residential development, this includes ensuring an adequate and available supply of quality housing to meet the needs of everyone and the use of a broad evaluation framework to assist judgements on the allocation of housing growth. Whilst the Council have identified an allocation within Table 3 of the DPS (**TSA 1**) and have carried out

an evaluation framework of settlements, these have not informed an overall strategic allocation to settlements.

Furthermore, the RDS states that an important step in the 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 the countryside. In their allocations, the Council have not assessed or judged the strategic growth of individual settlements or the most sustainable locations for housing.

Soundness Test C3 – Did the council take account of policy and guidance issued by the Department

As per the RDS, the SPPS (Para. 6.135) identifies that the regional strategic objectives for housing in settlements include managing housing growth to achieve sustainable patterns of development. The Council's strategic allocation of housing to settlements is not managed and does not direct housing to the most sustainable locations, outside of Lisburn City.

Furthermore, the SPPS states at Para. 6.142 that Local Development Plans are to set out the overall housing provision for each settlement over the plan period. Whilst this appears to be included in Table 3 of the DPS, this only sets out the potential units remaining, whether this is through existing zonings, live permissions, urban capacity units or windfall sites. The Council have not identified the overall strategic housing allocation for settlements based on the evidence provided.

Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow

The Council have not set out a strategic allocation of housing across settlements or a coherent strategy for the zoning of lands at the Local Plan Policies Stage.

The allocations set out in Table 3 of the DPS are not consistent with the Objectives of the Plan which are to support Towns, Villages and Small Settlements as vibrant and attractive centres providing homes and services appropriate to their role in the settlement hierarchy whilst protecting their identity from excessive development. There has been no assessment of the role of individual settlements or settlement tiers in respect of the strategic allocations set out in Table 3 of the DPS, which appear to be solely based upon existing commitments particularly within Villages and Small Settlements. As such, solely allocating housing based upon the existing split of commitments does not achieve the Council's strategic objectives.

Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

The allocations set out in Table 3 of the DPS are not appropriate as they do not strategically manage housing between settlements, taking into account the available evidence, particularly the Housing Growth Study and Settlement Appraisals. The Housing Growth Study, carried out by Lichfields, states that they have not carried out an assessment in respect of the distribution of future housing lands and the report does not provide a policy position in respect of future levels of housing provision, which is a matter for future determination by LCCC. This does not appear to have been carried out by LCCC.

Furthermore, the evidence base which identifies existing commitments (Housing Monitor 2016-2017) is inaccurate and as such the allocations provided are unrealistic.

Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances

As the allocation between settlements does not take into account the current strategic direction of the Council, it cannot be reasonably flexible to deal with changing circumstances over the Plan period.

3.2 Detailed Response

- 3.2.1 There appears to be a wealth of evidence provided by the Council in respect of housing growth. However, this has not informed the strategic allocations set out within Table 3 of the DPS. The housing allocations within Table 3 appear to be based on existing commitments and urban capacity sites in larger settlements, with no acknowledgement or assessment as to whether these figures are sustainable or appropriate over the Plan period. Furthermore, there is no strategy for the zoning of housing lands, apart from evidently zoning existing commitments and retaining existing zonings which are not committed. Strategic housing allocations should allow for the management of housing in the most sustainable, appropriate and realistic locations and these allocations should then be assessed against existing commitments (taking 10% off existing commitments at this stage to allow for flexibility in respect of deliverability). If a settlement has excess committed housing lands (compared to its strategic allocation) these could then be phased appropriately based on the likelihood of deliverability. This approach is in line with the provisions set out in Para. 6.142 of the SPPS which states Local Development Plans should provide for a managed release of housing land, in line with a 'plan, monitor and manage' approach.

3.2.2 Solely basing housing allocations on existing commitments, prior to a full assessment of the deliverability of lands and without provisions to zone additional lands, could result in significant inconsistencies between the Draft Plan Strategy and Local Policies Plan.

Evidence - Housing Growth Study (Lichfields)

3.2.3 As previously identified, the Council instructed an independent Housing Growth Study carried out by Lichfields. Whilst the Council relied on this study to determine their overall strategic housing allocation, there are a number of issues identified within the study which have not been considered by the Council when allocating housing to settlements.

3.2.4 Paragraph 9.11 of the Housing Growth Study states:

"No assessment has been undertaken in this study in respect of the distribution of future housing land and its alignment with the Local Plan Strategy ... It will be for LCCC to consider the spatial strategy of the Local Development Plan ... It is important that the future housing needs of all settlements are addressed through the emerging Local Development Plan."

3.2.5 The Draft Plan Strategy states at Page 58, the allocation of housing growth across the Council area has been informed by eight indicators provided in the SPPS. We will now assess these eight indicators in turn in respect of how they have influenced the housing allocation stated at Table 3 of the DPS.

RDS Housing Growth Indicators

3.2.6 As identified in **Section 2** of this representation, the Council have commissioned a study to update the 2012 based HGI's through the use of 2016 based household projections data, together with adjustments set out within the 2012 based HGI methodology. This resulted in a rounded up figure of 700 dwellings per annum equating to 10,500 dwellings for the plan period. A buffer of 10% over supply has been applied to the HGI baseline figure to give a strategic housing allocation figure of 11,550. This figure should be strategically allocated between settlements in line with the Council's Spatial Growth Strategy. This has not been carried out by the Council and as such the DPS is unsound.

3.2.7 Therefore, **Table 4** below sets out an initial split of our revised Strategic Housing Allocation figure (12,260) between settlement tiers based on the existing percentage split of households. We have allowed for 729 dwellings in the countryside as per Table 3 of the DPS, resulting in a remaining 11,531 dwellings to be allocated between settlements.

Table 4: TSA Initial Allocations to Settlement Tiers

| Settlement Tier | Current No. Households | % Of All Households within Settlements | Allocation |
|---------------------------------------|------------------------|----------------------------------------|---------------|
| Lisburn | 18,415 | 41% | 4728 |
| Lisburn Greater Urban Area | 1979* | 4% | 461 |
| Castlereagh Greater Urban Area | 12,287* | 27% | 3113 |
| GUA Total | 14,266 | 31% | 3574 |
| Towns | 6040 | 13% | 1500 |
| Villages | 4965 | 11% | 1268 |
| Small Settlements | 1630** | 4% | 461 |
| Settlement Total | 45,316 | 100% | 11,531 |

* Estimate based on an average household size of 2.5 persons

** Estimate based on Settlement Appraisal

3.2.8 We have then adjusted the above figures to take into account the settlement hierarchy and growth strategy. This has focussed on the percentage split between Towns, Villages and Small Settlements to focus more growth within the Towns and Villages as these settlements have a higher level of services, community facilities and public transport provision compared to Small Settlements. Whilst we appreciate growth should be focussed within Lisburn City, the percentage allocation has remained the same, as increased growth will be facilitated by the Strategic Mixed Use designation at West Lisburn/Blaris (additional 1,500 dwellings). The amended allocations are detailed at **Table 5** below.

Table 5: TSA Allocations based on Spatial Growth Strategy

| Settlement Tier | % Of All Households within Settlements | Adjusted % to Support Growth Strategy | Amended Allocation |
|---------------------------------------|----------------------------------------|---------------------------------------|--------------------|
| Lisburn | 41% | 41% | 4728 |
| Lisburn Greater Urban Area | 4% | 4% | 461 |
| Castlereagh Greater Urban Area | 27% | 27% | 3113 |
| GUA Total | 31% | 31% | 3574 |
| Towns | 13% | 14% | 1614 |
| Villages | 11% | 12% | 1384 |
| Small Settlements | 4% | 2% | 231 |
| Total | 100% | 100% | 11,531 |

* Estimate based on an average household size of 2.5 persons

** Estimate based on Settlement Appraisal

3.2.9 Using the above settlement tier allocations, these have been split between settlements in respect of their current percentage share of households as shown at **Table 6** below.

Table 6: TSA Base Allocations to Settlements

| Settlement | Allocation |
|------------------------------|---------------|
| City | |
| Lisburn | 4728 |
| City Total | 4728 |
| Greater Urban Areas | |
| Lisburn GUA | 461 |
| Castlereagh GUA | 3113 |
| GUA Total | 3574 |
| Towns | |
| Carryduff | 695 |
| Hillsborough and Culcavy | 468 |
| Moira | 451 |
| Towns Total | 1614 |
| Villages | |
| Ahgalee | 84 |
| Annahilt | 103 |
| Dromara | 111 |
| Drumbeg | 90 |
| Drumbo | 44 |
| Glenavy | 167 |
| Lower Ballinderry | 92 |
| Maghaberry | 245 |
| Milltown | 159 |
| Moneyreagh | 144 |
| Ravernet | 59 |
| Stoneyford | 59 |
| Upper Ballinderry | 27 |
| Villages Total | 1384 |
| Small Settlements | 231 |
| Settlements Total | 11,531 |

Use of the RDS housing evaluation framework

3.2.10 The Council have carried out a housing evaluation framework within their Settlement Appraisal (Technical Supplement 6). Whilst the Council state this has assisted in informing the proposed settlement hierarchy, the assessment does not appear to have been used in the process of allocating housing to settlements as suggested within the RDS. There has been no adjustment to allocations based upon the results of each HEF test. This has the potential for housing growth to be directed towards unsuitable and unsustainable locations. For example, within Technical Supplement 1, Table 11 indicates there is a remaining potential for 80 no. dwellings within Stoneyford, a Village of 213 no. households and which scored 'Low' within the resource and community services tests of the Settlement Appraisals. This can be compared to the Village of Maghaberry which appears to have been allocated a lower level of growth (70 no. dwellings) based on its remaining potential. However, Maghaberry comprises 886 households and scored 'Medium' on both the resource and community services tests, demonstrating that it is a more sustainable location for housing growth. This is not the only example of imbalance within the DPS housing allocations but seeks to illustrate how it is wholly inappropriate to allocate housing based on existing commitments without considering the role of individual settlements.

3.2.11 We have therefore endeavoured to score settlements based on the Settlement Appraisal (TS6) using the below scoring system (except for development constraints whereby Low scores +5 and High scores -5):

- Low -5%
- Medium 0
- High +5%

For the purposes of this exercise, all tests are proportioned the same score, however, the Council may find it prudent to apportion certain tests greater weight. The results are shown at **Table 7** below. Please note, Lisburn Greater Urban Area and Castlereagh Greater Urban Area are not included within the table as these settlements were not assessed within the Settlement Appraisal.

Table 7: Settlement Appraisal Score Matrix

| Settlement | Res. | Env. Cap. | Trans. | Econ. Dev. | Char. | Comm. Serv. | Soc. | Dev. Con. | Score |
|--------------|------|-----------|--------|------------|-------|-------------|------|-----------|-------|
| City | | | | | | | | | |
| Lisburn | H | H | M | H | H | H | M | H | - |
| Towns | | | | | | | | | |
| Carryduff | M | H | M | M | H | M | M | H | 5 |
| Hillsborough | H | H | M | M | H | H | M | M | 20 |
| Moira | H | H | M | M | H | M | M | H | 10 |

| Table 7 Continued | | | | | | | | | |
|--------------------------|------|-----------|--------|------------|-------|-------------|------|-----------|-------|
| Settlement | Res. | Env. Cap. | Trans. | Econ. Dev. | Char. | Comm. Serv. | Soc. | Dev. Con. | Score |
| Villages | | | | | | | | | |
| Aghalee | M | M | M | L | H | M | L | M | -5 |
| Annahilt | L | M | M | L | H | L | M | M | -10 |
| Dromara | M | H | M | L | M | M | M | M | 0 |
| Drumbeg | L | H | M | L | M | L | M | M | -10 |
| Drumbo | L | H | L | L | H | M | L | M | -10 |
| Glenavy | H | L | M | M | M | H | M | M | 5 |
| Lower Ballinderry | L | H | M | M | H | M | M | H | 0 |
| Maghaberry | M | M | M | M | H | M | L | M | 0 |
| Milltown | L | H | M | L | H | M | M | H | -5 |
| Moneyreagh | M | H | M | M | H | M | M | H | 5 |
| Ravernet | L | H | M | M | H | L | L | H | -10 |
| Stoneyford | L | H | M | M | H | L | M | H | -5 |
| Upper Ballinderry | L | H | M | M | H | L | M | H | -5 |
| Small Settlements | | | | | | | | | |
| Ballyaughlis | L | H | L | L | M | L | M | M | -15 |
| Ballycarn | L | H | L | L | M | L | L | H | -25 |
| Ballyknockan | L | H | M | M | H | L | M | H | -5 |
| Ballylesson | L | H | L | M | H | M | M | M | 0 |
| Ballynadolly | L | M | M | L | M | L | L | M | -20 |
| Ballyskeagh | L | H | M | M | H | L | M | H | -5 |
| Boardmills | L | M | L | L | L | M | M | M | -20 |
| Carr | L | L | L | L | M | M | M | M | -20 |
| Crossnacreevy | L | H | M | M | H | L | M | H | -5 |
| Drumlough | L | H | M | L | M | L | M | M | -10 |
| Drumlough Road | L | M | L | L | M | L | M | M | -20 |
| Dundrod | L | M | L | L | M | M | M | M | -15 |
| Duneight | L | M | M | L | H | L | L | H | -20 |
| Feumore | L | H | M | M | H | L | M | H | -5 |
| Halfpenny Gate | L | M | L | L | H | L | M | M | -15 |
| Halftown | L | M | M | L | M | M | M | M | -10 |
| Hillhall | M | H | L | M | M | M | L | H | -10 |
| Kesh Bridge | L | L | M | M | M | H | M | M | -15 |
| Lambeg | L | H | M | M | H | L | M | H | -5 |
| Legacurry | L | H | M | M | H | M | L | H | -5 |
| Long Kesh | L | H | M | M | H | M | M | H | 0 |
| Lower Broomhedge | L | H | M | M | H | L | L | H | -10 |
| Lurganure | L | H | M | L | H | L | M | H | -15 |
| Lurganville | L | M | L | L | M | L | L | M | -25 |
| Lurgill | L | H | M | M | H | L | M | H | -5 |
| Magheraconluce | L | M | L | L | M | L | L | M | -25 |
| Morningside | L | L | M | L | H | L | L | M | -20 |
| Purdysburn | L | H | L | M | H | L | L | H | -15 |
| Ryan Park | L | H | M | M | H | L | M | H | -5 |

| Settlement | Res. | Env. Cap. | Trans. | Econ. Dev. | Char. | Comm. Serv. | Soc. | Dev. Con. | Score |
|------------------|------|-----------|--------|------------|-------|-------------|------|-----------|-------|
| St. James | L | M | L | L | M | M | L | M | -20 |
| The Temple | L | H | M | M | H | L | M | H | -5 |
| Tullynacross | L | H | L | L | M | L | M | H | -20 |
| Upper Broomhedge | L | M | L | M | H | L | L | H | -20 |

3.2.12 Using the above percentage scores, the base allocations (**Table 6** above) were increased or decreased accordingly. These results were then adjusted to ensure the overall allocations to each settlement tier remain the same as shown in **Table 8** below. A full table of calculations is included at **Annex 1** for reference. The allocation for Lisburn has remained as 4,728 dwellings as it is the only settlement within the City tier. Allocations to greater urban areas also remain the same as these were not assessed in the settlement appraisal.

Table 8: Adjusted Allocations based on HEF

| Settlement | Base Allocation | Adjusted HEF Allocation Rounded |
|----------------------------|-----------------|---------------------------------|
| City | | |
| Lisburn | 4728 | 4728 |
| City Total | 4728 | 4728 |
| Greater Urban Areas | | |
| Lisburn GUA | 461 | 461 |
| Castlereagh GUA | 3113 | 3113 |
| GUA Total | 3574 | 3574 |
| Towns | | |
| Carryduff | 695 | 659 |
| Hillsborough and Culcavy | 468 | 507 |
| Moira | 451 | 448 |
| Towns Total | 1614 | 1614 |
| Villages | | |
| Ahgalee | 84 | 81 |
| Annahilt | 103 | 95 |
| Dromara | 111 | 114 |
| Drumbeg | 90 | 82 |
| Drumbo | 44 | 40 |
| Glenavy | 166 | 178 |

| Table 8 Continued | | |
|--------------------------|------------------------|----------------------------------------|
| Settlement | Base Allocation | Adjusted HEF Allocation Rounded |
| Lower Ballinderry | 91 | 94 |
| Maghaberry | 247 | 253 |
| Milltown | 159 | 155 |
| Moneyreagh | 144 | 154 |
| Ravernet | 59 | 54 |
| Stoneyford | 59 | 58 |
| Upper Ballinderry | 27 | 26 |
| Villages Total | 1384 | 1384 |
| Small Settlements | 231 | 231 |
| Settlements Total | 11,531 | 11,531 |

3.2.13 The above figures are indicative at the stage, taking consideration of the Settlement Appraisals prepared by the Council. However, we wish to identify our concerns with the consistency of the Settlement Appraisal evidence. For certain tests, particularly the environmental capacity test, is it unclear whether a low score is positive or negative and vice versa, as this appears to alternate between settlements.

3.2.14 Therefore, the Settlement Appraisal should be reviewed and amended accordingly to ensure consistency. The Council should then use the accurate evidence to adjust figures within the above Table as necessary. Additional weight may be given to certain tests, for example the resource and economic development test, as these would permit increased residential growth in the most sustainable locations.

Allowance for existing commitments

3.2.15 The Council have assessed existing commitments based on the latest housing monitor information. The Council state that monitored sites consist of existing housing zonings and committed sites with planning permission. The latest housing monitor is based at March 2017 and this appears to have formed the main foundation of housing allocations across all settlements.

3.2.16 As stated above, basing housing allocations solely on existing commitments without consideration of whether these allocations are sustainable, realistic or appropriate is unsound in relation to a number of soundness tests. Housing allocations to settlements should be formed

from the overall strategic growth figure and these should then be compared to existing commitments to inform whether there is sufficient lands within settlements to meet their allocations.

3.2.17 We have significant concerns relating to the accuracy of the 2017 Housing Monitor Statistics. From a desktop study of selected settlements, it would appear that a number of monitored sites with “live” planning permission have now expired or planning applications have been submitted and approved to alter potential yields. For example, following a desktop study, **Table 9** below identifies changes in the Housing Monitor Statistics from those stated within the Draft Plan Strategy in respect of Glenavy. As shown within the Table, the actual remaining potential yield of 166 no. dwellings is significantly lower than the 269 no. dwelling identified within the 2017 Housing Monitor Statistics. Furthermore, the number is reduced by more than the 10% which was allowed in the DPS to counteract deliverability issues. This indicates that more than 10% of sites in settlements could be undeliverable.

Table 9: Glenavy Survey

| Site Ref. | Site Name | Status | HM Remaining Yield | Comments | Change in Yield |
|-----------|---------------------------------------|---------------|--------------------|---------------------------------------------------------------------------------------------------|-----------------|
| 15399 | 15 Crumlin Road | Dev. On-going | 38 | LA05/2017/0525/F for 19 dwellings currently under consideration | -19 |
| 15400 | Crumlin Road GY 03/02 | Dev. On-going | 45 | LA05/2016/1243/F reduction in density from 44 to 30 dwellings | -15 |
| 15406 | Adjacent to 19 Glen Road | Dev. On-going | 1 | No change | 0 |
| 16659 | Site off the Chestnut Glen | Dev. On-going | 1 | No Change | 0 |
| 16948 | Former St Aidans Grammar | Dev. On-going | 38 | No Change | 0 |
| 17166 | Rear of 40, 42, 44 and 46 Main Street | Not Started | 36 | S/2007/1526/F Expired 16.11.2014 | -36 |
| 17180 | 70 to 81 Moira Road | Not Started | 13 | LA05/2015/0043/F 16 dwellings and LA05/2015/0043/F for additional dwelling | 4 |
| 18113 | 5 Glen Road GY 04/01 | Not Started | 18 | LA05/2016/0702/F for 6 dwellings | -12 |
| 18345 | 5A Belfast Road | Dev. On-going | 5 | No Change | 0 |
| 18376 | 2 Glen Road | Not Started | 27 | LA05/2018/0489/F for 23 dwellings. Social Housing. On site 2018-19. | -4 |
| 18768 | Adjacent to 11 Glen Road | Not Started | 4 | LA05/2016/0081/O for 3 dwellings. LA05/2019/0719/F currently under consideration for 3 dwellings. | -1 |

| Table 9 Continued | | | | | |
|--------------------------|-----------------------------|----------------------------|---------------------------|---------------------------------------------------------------|------------------------|
| Site Ref | Site Name | Remaining Potential | Adjusted Potential | Comment | Change in Yield |
| 19240 | Adjacent to 2 Gobrana Road | Not Started | 1 | S/2004/0812/F under consideration | -1 |
| 20565 | 3-5 Belfast Road | Not Started | 13 | LA05/2017/0883/F for 9 dwellings, consultations issued | -4 |
| 20566 | 63 Main Street | Not Started | 1 | S/2010/0757/F expired 23.05.16 | -1 |
| 20676 | 52-58 Main Street | Not Started | 13 | LA05/2016/0453/F 13 no. units now completed by Choice housing | 0 |
| 20677 | North of 52 Main Street | Not Started | 14 | S/2009/1183/F expired 01.06.16 | -14 |
| 21556 | 15m South of 7 Crumlin Road | Not Started | 1 | S/2014/0722/F expires 10.06.20 | 0 |
| Total | | | 269 | | -103 |
| | | | | Indicative Remaining Yield | 166 |

3.2.18 The above table illustrates how settlements may have significantly lower potential for future housing when considering live planning approvals, compared to that stated within the Housing Monitor Statistics and the DPS.

3.2.19 Furthermore, within the Housing Growth Study, Lichfields have identified an issue with the delivery of housing across the Council area. In response to this, they state that it will be important for LCCC to consider the future deliverability of sites to ensure the identified future housing growth can be delivered on sites across the Plan period. We would agree with this statement, particularly in respect of existing zoned sites on which there has been no commitment to develop. This should be reflected in the existing remaining potential.

3.2.20 As the evidence within the DPS is inaccurate, this has the potential to result in significant inconsistencies between the Draft Plan Strategy and Local Policies Plan and could negatively impact upon the delivery of housing over the Plan period. On this basis, it cannot be determined at this stage if further housing lands will be required within the Local Policies Plan. Furthermore, from discussions with the Council, we understand accurate and up to date housing monitor information is currently being prepared but will not be available prior to the end of the DPS consultation period. As such, the publication of the Draft Plan Strategy was premature as it could not consider the most robust evidence, particularly when existing commitments have largely informed the allocation of housing. It is not clear what the Council's strategy will be at Local Policies Plan stage, should the latest Housing Monitor identify a major reduction in remaining potential, considering there is no strategic policy for the zoning and management of housing land.

3.2.21 The Council have indicated that existing commitments have been reduced by 10% due to the possibility of non-deliverability of sites over the Plan period. Whilst we appreciate this methodology in order to ensure there is adequate availability of housing land, we do not agree this should not be used to reduce the overall allocations to individual settlements.

Urban Capacity Study

3.2.22 The Council have carried out an Urban Capacity Study in respect of settlements which comprise a population of over 5,000. We support that this study is used to inform the DPS document, however, we have concerns regarding the accuracy of information. For example, in respect of Carryduff, there are 8 no. urban capacity sites identified for further review. The potential yield for all of these sites is calculated at 25 dph, however a range of house types are identified between sites (detached, semi-detached, townhouses). As such, a blanket density is not appropriate. In addition, Site 211 retains a site area of 0.7ha, however, the site area is 0.54ha and there is a planning approval on the site for community uses. Furthermore, the majority of the sites identified are partially within a floodplain or LLPA and as such do not represent the most appropriate sites for residential development within Carryduff.

3.2.23 In addition to the sites identified within the UCS, lands within the settlement limit, which are currently zoned for other uses but have not been developed should also be reviewed. These sites have already been assessed as suitable for development and may be more appropriate for residential development than the use they are currently zoned for. This is particularly pertinent in respect of existing employment lands, of which there is a significant surplus compared to the identified requirement over the Plan period.

3.2.24 The Urban Capacity Study should therefore be reviewed and amended accordingly to ensure the DPS is based on an accurate and robust evidence base.

Allowance for Windfall Housing

3.2.25 We accept the Council's assessment of windfall housing. However, as per existing commitments and the urban capacity study results, this should be compared to strategic allocations for individual settlements in order to inform whether the settlement is able to deliver its strategic allocation within its existing limits.

Housing Needs Assessment/Housing Market Analysis

3.2.26 As stated within the DPS, there is a requirement for 6,240 affordable housing units over the plan period, of which 2,400 are social housing units. The Council have identified that the deliverability of affordable housing will largely depend on the zoned sites remaining to be developed and other urban capacity/windfall sites. Firstly, as the deliverability of these lands has not been assessed at this stage, it is inappropriate to assume these will come forward for residential development during the plan period and a reliance on these sites for the provision

of affordable housing is unrealistic. Therefore, the reliance of the Council on existing committed sites will result in difficulty in providing affordable housing units.

3.2.27 This is particularly relevant in certain settlements such as Glenavy. Glenavy currently has a social housing requirement of 70 no. dwellings over the Plan period, which does not take into account further affordable housing requirements. Following a desktop study of planning permissions in the Village, we have found that there are no lands currently zoned for housing which do not benefit from live planning permission. Furthermore, there has been no assessment of urban capacity or windfall sites in the settlement and as such, there is little to no scope of providing further affordable housing within the Village.

3.2.28 The Council have also stated that any future identified shortfall in affordable housing may be addressed at LPP stage through the zoning of land for affordable housing. We wish to state at this stage that this strategy is not consistent with the Council's overall strategy to ensure mixed tenure developments and is therefore unsound. The Housing Needs Assessment should therefore inform whether additional general housing lands are required within settlements to accommodate sustainable, mixed tenure developments.

Application of a sequential approach

3.2.29 We agree with the use of a sequential approach to housing lands within settlements of 5,000 people or more, but this must be informed by accurate evidence as identified above.

Transport Assessments

3.2.30 The Council's text in respect of Transport Assessments at Page 61 of the DPS Part 1, does not relate to the allocation of housing in settlements. The Council should identify how Transport Assessments have influenced their housing allocations which will link to the Housing Evaluation Framework.

3.3 Changes to the Draft Plan Strategy

3.3.1 Based upon the above commentary, we respectfully suggest the following amendments are made to ensure the Plan Strategy is Sound, as detailed in **Table 10**.

- *Amendment 1:* Provide a strategic housing allocation between settlement tiers and individual settlements which manages growth in line with the Council's growth strategy and considers the provided evidence, this can then be compared to existing commitments
- *Amendment 2:* Review existing commitments and urban capacity sites to ensure these are accurate and compare these to allocations between settlements
- *Amendment 3:* Remove reference to there being sufficient housing land supply

- *Amendment 4: Provide strategic policy for the zoning and management of housing lands within settlements.*

Table 10: TSA suggested changes in relation to tests of soundness

| |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Soundness Test C1 – Did the Council take account of the RDS</i> |
| The proposed amendments take account of the RDS in relation to allocating housing land, particularly in respect of the Housing Evaluation Framework. |
| <i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i> |
| In line with the SPPS, the amendments provide for managed housing growth and allow for the provision of housing to individual settlements, ensuring sustainable patterns of development. |
| <i>Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow</i> |
| The amendments will allow for the LDP to follow a coherent strategy which flows from the strategic objectives to the allocation of housing between settlements. This will allow for coherence between the Plan Strategy and Local Policies Plan. |
| <i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i> |
| The proposed amendments consider the available evidence which should inform housing allocations. As such, the allocations are appropriate to the role of individual settlements. |
| <i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i> |
| The current DPS does not allow for changes to committed housing figures within settlements. Through strategically allocating housing this ensures that if existing provisions are reduced prior to Local Plan Policies stage, this can be addressed appropriately. |

4. DPS Part 2: Policy HOU10 – Affordable Housing in Settlements

4.1 Summary

- 4.1.1 We support the need for an affordable housing strategic Policy within the Draft Plan Strategy. However, Policy HOU10 is currently unsound in respect of the threshold and percentage provision stated within the Policy as identified at **Table 11** and our detailed response below.

Table 11: Summary of Relevant Soundness Tests

| |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow</i> |
| In its current form the DPS is unsound as the housing allocations are not coherent with Policy HOU10. |
| <i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i> |
| The current provisions of Policy HOU10 are unrealistic and inappropriate. The evidence provided to support the Policy is not sufficiently robust in order to justify such an onerous Policy. |
| <i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i> |
| Policy HOU10 is completely inflexible as it is overly onerous on developers and does not account for issues of viability in residential developments. |

4.2 Detailed Response

- 4.2.1 We note that within the Housing Growth Study, Lichfields advise that affordability is a particular issue within the Council area, which supports the need for a percentage based policy approach in Lisburn and Castlereagh (Para. 9.4). However, Paragraph 4.36 of Technical Supplement 1 identifies that the specifics of the Policy have been simply derived from applying a 10% and 20% figure to previous planning applications over a 5 year period. From this the Council have identified that 2,040 affordable housing units could be provided through a 5 unit threshold and 20% affordable housing contribution. This evidence is not sufficient enough to support such an onerous policy.
- 4.2.2 To support their Draft Plan Strategy, Belfast City Council referenced a study carried out by the Three Dragons in respect of Affordable Housing and Developer Contributions. The study concludes that considering the impact of introducing a developer contribution specifically on

small and micro businesses we find that such businesses make up a large part of the housebuilding industry and that there are particular issues they would face if a developer contribution scheme were introduced. Furthermore, the conclusion from the viability analysis is that for most of the region, a developer contribution scheme will not work.

- 4.2.3 Taking account of this evidence, it would appear that further research is required into the viability of Policy HOU10 and the impact it may have, particularly on smaller housebuilders. This is particularly important within Lisburn and Castlereagh whereby affordability and delivery of housing is already an issue as identified by Lichfields within their Housing Growth Study. Whilst we appreciate the Council are aiming to deliver as many affordable housing units as possible, the current Policy has the potential to stymie residential development in general and as such could have a negative impact upon the affordability of housing.
- 4.2.4 We agree with the overall strategy to include a threshold and proportion for affordable housing within the Plan Strategy. However, we would suggest given the current market uncertainty, it is more appropriate and realistic to begin with a cautious interpretation of the Three Dragons report and include a phased introduction/approach to affordable housing as outlined below:
- 1 to 20 units Nil
 - 21 to 50 units 10%
 - 51 to 250 units 15 %
 - 250 plus units 20%
- 4.2.5 Under the provisions of Plan Monitoring, the threshold and proportion figures could be amended after 5 years when the impacts of Brexit on the economy are more certain, a current viability assessment can be prepared and the success of the policy and its impacts on overall housebuilding can be assessed. This could be achieved through a similar statement to that within Policy H 8 of the Manchester Core Strategy which states "These thresholds will be subject to amendment over the lifetime of the Core Strategy to reflect changing economic circumstances". This presents a more preventative approach in relation to economic sustainability rather than remediating any significant damage caused to developers, through a Policy which is too restrictive.
- 4.2.6 In relation to making the Policy reasonably flexible, we suggest that the suitable alternatives for non-viable schemes includes exemption from the Policy. By way of example, this is included in Policy H 8 of the Manchester Core Strategy which states "Either an exemption from providing affordable housing, or a lower proportion of affordable housing, a variation in the proportions of socially rented and intermediate housing, or a lower commuted sum, may be permitted where either a financial viability assessment is conducted and demonstrates that it is viable to deliver

only a proportion of the affordable housing target of 20%; or where material considerations indicate that intermediate or social rented housing would be inappropriate.”

4.2.7 Although the above may provide a lower level of affordable housing provision than anticipated by the Council, this will be significantly supported by SMU01 West Lisburn/Blaris which would provide c.300 no. affordable housing units. This Strategic Mixed Use site provides the perfect opportunity to support a balanced, mixed tenure community in line with the Councils overall Strategy. This will assist in delivering the social housing requirement in Lisburn City and will reduce the onus on smaller developers whereby financial viability may hinder development.

4.2.8 Lastly, Policy HOU10 identifies that affordable housing may be provided through specific zonings where a need has been identified by the Northern Ireland Housing Executive at Local Policies Plan stage. We wish to identify that this is contradictory with the Councils strategy which states that affordable housing should be delivered through mixed tenure developments which offer high quality of design to help promote community cohesion and sustainable neighbourhoods in line with regional policy. As such, where a need is identified, sufficient land should be zoned for housing to allow for a percentage of affordable housing on mixed tenure developments.

4.3 Changes to the Draft Plan Strategy

4.3.1 Based upon the above commentary, we respectfully suggest the following amendments are made to ensure the Plan Strategy is sound, as detailed in **Table 12**.

- *Amendment 1:* Amend Policy HOU10 to reflect the thresholds set out in paragraph 4.2.4
- *Amendment 2:* Allow provisions for when the delivery of affordable housing is not viable
- *Amendment 3:* Ensure sufficient land is zoned within the LPP to allow for mixed tenure developments where a need is identified.

Table 12: TSA suggested changes in relation to the tests of soundness

| |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Soundness Test CE1 – The DPD sets out a coherent strategy for which its policies and allocations logically flow</i> |
| Amendment 3 allows for a coherent strategy which promotes mixed tenure developments |
| <i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i> |
| All amendments allow for the appropriate and realistic delivery of affordable housing taking account of all relevant evidence. |

Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances

Amendments 1 and 2 allow for a change in market circumstances which will not hinder housing development over the Plan period.

5. Glenavy

- 5.1 The Council have proposed retaining the settlement of Glenavy as a Village within the Settlement Hierarchy. Whilst we agree with this designation, consideration must be had to the role of specific settlements within the hierarchy to determine the levels of growth which can be accommodated. In respect of Glenavy, as recognised within the Settlement Appraisal prepared by the Council, the Village currently acts as an important service centre for an extensive rural hinterland and benefits from a good range of retail/business/service provision including a supermarket, hairdresser, fruit and vegetable shop, a range of ecclesiastical buildings and a community centre. The Village also has a strong community function with churches, a school, GAA club and two community centres which serve the village and surrounding rural population. Furthermore, Glenavy is strategically located on the A26 Moira Road with close proximity to the M1 and public transport links to Crumlin, Lisburn and Belfast. As such, the Village is ideally suited to accommodating increased population growth.
- 5.2 The evidence presented within this representation identifies a potential need for further housing within Glenavy over the Plan period. Whilst the DPS identifies a potential remaining yield of 269 no. dwellings, we have previously identified a requirement to further analyse the evidence given within same. Furthermore, detailed analysis of housing land availability at December 2019, carried out by TSA, indicates that when current completions and expired permissions are taken into account, there is a remaining yield of 166 no. dwellings within the Village as evidenced at **Table 13**.

Table 13: Glenavy Survey – December 2019

| Site Ref. | Site Name | Status | HM Remaining Yield | Comments | Change in Yield |
|-----------|---------------------------------------|---------------|--------------------|----------------------------------------------------------------------------|-----------------|
| 15399 | 15 Crumlin Road | Dev. On-going | 38 | LA05/2017/0525/F for 19 dwellings currently under consideration | -19 |
| 15400 | Crumlin Road GY 03/02 | Dev. On-going | 45 | LA05/2016/1243/F reduction in density from 44 to 30 dwellings | -15 |
| 15406 | Adjacent to 19 Glen Road | Dev. On-going | 1 | No change | 0 |
| 16659 | Site off the Chestnut Glen | Dev. On-going | 1 | No Change | 0 |
| 16948 | Former St Aidans Grammar | Dev. On-going | 38 | No Change | 0 |
| 17166 | Rear of 40, 42, 44 and 46 Main Street | Not Started | 36 | S/2007/1526/F Expired 16.11.2014 | -36 |
| 17180 | 70 to 81 Moira Road | Not Started | 13 | LA05/2015/0043/F 16 dwellings and LA05/2015/0043/F for additional dwelling | 4 |
| 18113 | 5 Glen Road GY 04/01 | Not Started | 18 | LA05/2016/0702/F for 6 dwellings | -12 |

| | | | | | |
|--------------|-----------------------------|---------------|------------|------------------------------------------------------------------------------------------------------|-------------|
| 18345 | 5A Belfast Road | Dev. On-going | 5 | No Change | 0 |
| 18376 | 2 Glen Road | Not Started | 27 | LA05/2018/0489/F for 23 dwellings. Social Housing. On site 2018-19. | -4 |
| 18768 | Adjacent to 11 Glen Road | Not Started | 4 | LA05/2016/0081/O for 3 dwellings. LA05/2019/0719/F currently under consideration for 3 dwellings. | -1 |
| 19240 | Adjacent to 2 Gobraña Road | Not Started | 1 | S/2004/0812/F under consideration | -1 |
| 20565 | 3-5 Belfast Road | Not Started | 13 | LA05/2017/0883/F for 9 dwellings, consultations issued | -4 |
| 20566 | 63 Main Street | Not Started | 1 | S/2010/0757/F expired 23.05.16 | -1 |
| 20676 | 52-58 Main Street | Not Started | 13 | LA05/2016/0453/F 13 no. units now completed by Choice housing | 0 |
| 20677 | North of 52 Main Street | Not Started | 14 | S/2009/1183/F expired 01.06.16 | -14 |
| 21556 | 15m South of 7 Crumlin Road | Not Started | 1 | S/2014/0722/F expires 10.06.20 | 0 |
| Total | | | 269 | | -103 |
| | | | | Indicative Remaining Yield | 166 |

- 5.3 Whilst we appreciate that any extensions and residential designations are reserved for Local Policies Plan stage, we feel it is expedient to make the Council aware at this stage that our client is committed to bring the lands identified at **Annex 2** forward for residential development within the plan period. As such, these lands are *available* and would assist in *delivering* the minimum housing growth figure.
- 5.4 The identified lands measure c.2.85ha and are located to the North of Glenavy. Fronting Gobraña Road as shown at **TSA 2** below. The site lies adjacent to the current settlement development limit along its southern and western boundaries and is bound by existing residential development at Glen River Park to the south.



TSA 2: Site Location

- 5.5 Within the Settlement Appraisal, the Council identify that the development constraints on Glenavy are currently *High*. However, the appraisal also recognises that the A26 Moira Road provides a very strong defensible boundary to the east of the village. The subject lands are bound by the A26 to the east and fall within this natural boundary as shown at **Annex 3**. Therefore, these lands would form a natural rounding off to the settlement of Glenavy for the provision of residential development as evidenced within the montage at **Annex 4**.
- 5.6 We note that the Council have stated within the Settlement Appraisal that there are 2 fields in the Northern portion of Glenavy within the settlement limit which are zoned for industry, but could be reallocated as another use. In response to this, we wish to identify that these lands represent the only zoned industrial lands within Glenavy. At Page 83 of the DPS the Council states that the two rural sites at Glenavy and Crossnacreevy are carried forward from the existing development plan and provide opportunities for start up/small-medium businesses. As such, these lands are inappropriate to be brought forward for residential development and are more suitable to provide a wider range of employment opportunities for local residents.
- 5.7 For the reasons set out above, we respectfully request the Council retain **Section 5** of this representation to inform the Local Policies Plan stage, whereby the identified site would form a natural extension to the existing settlement of Glenavy and assist in delivering mixed tenure residential dwellings to meet housing demand within the plan period.

6. Conclusions

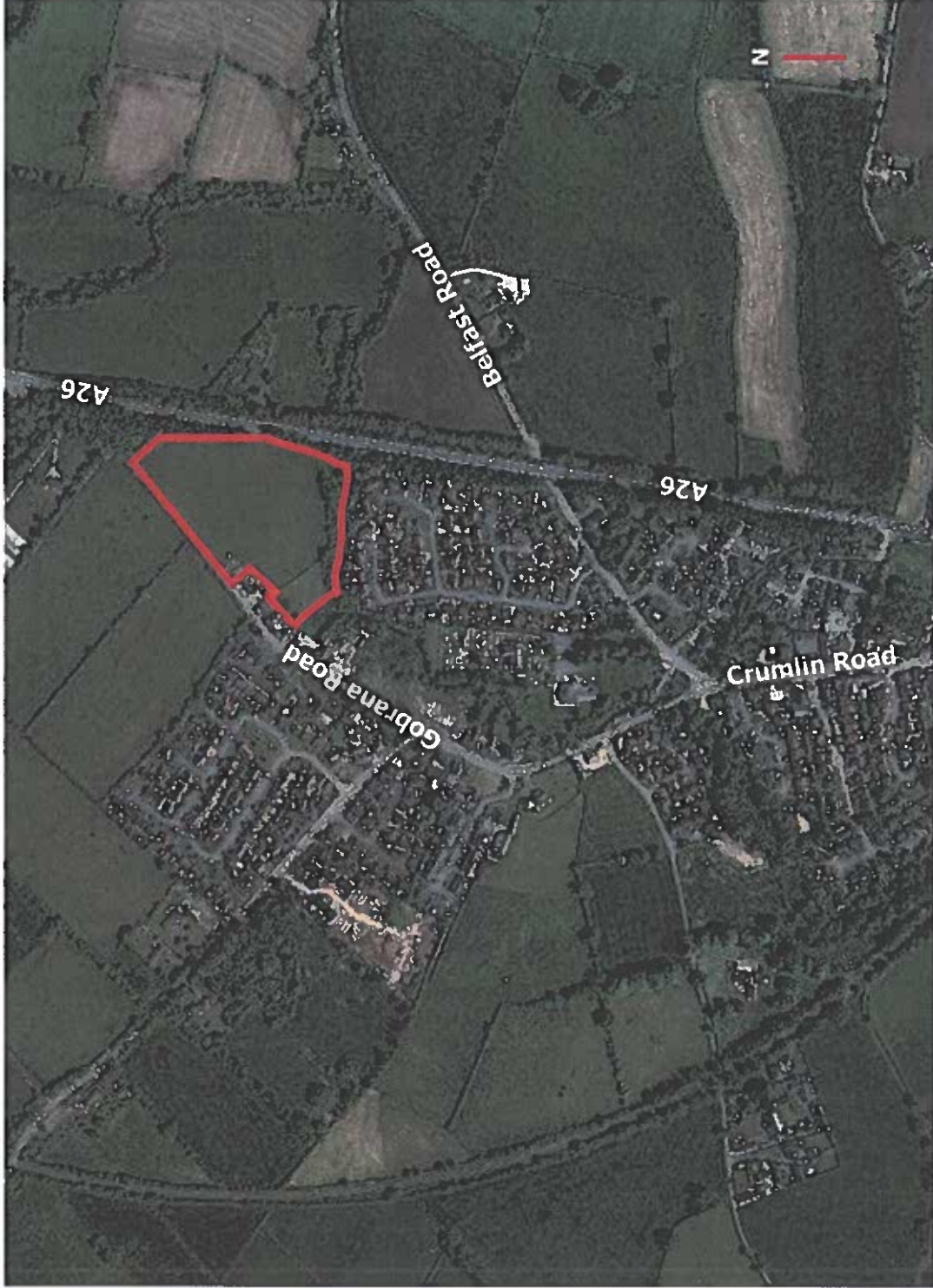
- 6.1 In conclusion, this representation has assessed the published Draft Plan Strategy in respect of the Strategic Policies 08 and HOU10 and found same to be unsound, taking in to account the soundness tests set out in Development Plan Practice Note 6 – Soundness.
- 6.2 The representation has analysed the overall Strategic Housing Allocation number and identified this should be increased to a figure of 12,260 dwellings in order to take account of local evidence and published HGIs, allowing reasonable flexibility to deal with a change in circumstances.
- 6.3 The allocation of housing growth between individual settlements has not been appropriately carried out by the Council and as such TSA have set out indicative allocations taking consideration of all evidence including the Council's HEF contained within the Settlement Appraisals.
- 6.4 The representation has suggested amendments in respect of the Council's Policy HOU10 Affordable Housing in Settlements which is currently too onerous on smaller house builders and is not currently founded on a robust evidence base.
- 6.5 For the reasons set out within this representation we respectfully request the stated amendments are supported and brought forward within the adopted Plan Strategy.
- 6.6 Additionally, whilst we appreciate that any extensions and residential designations are reserved for Local Policies Plan stage, we respectfully request the Council retain **Section 5** of this representation to inform the Local Policies Plan stage, whereby the identified site would form a suitable rounding off to the Village of Glenavy.

ANNEX 1
TSA HOUSING ALLOCATIONS TABLE – HEF ADJUSTMENT

ANNEX 1 - TSA Allocation to Settlements - HEF Adjustment

| Settlement | Population | Households | % of Settlement Tier | Base Allocation | HEF Adjustment | Adjusted Allocation | Adjusted % of Settlement Tier | Final Adjusted Allocation | Adjusted HEF Allocation Rounded |
|----------------------------|------------|---------------|----------------------|-----------------|----------------|---------------------|-------------------------------|---------------------------|---------------------------------|
| City | | | | | | | | | |
| Lisburn | 45,410 | 18,415 | 100 | 4728 | | | | | 4728 |
| Greater Urban Areas | | | | | | | | | |
| Lisburn GUA | | 1,979 | 13.87 | 461 | | | | | 461 |
| Castlereagh GUA | | 12,287 | 86.13 | 3113 | | | | | 3113 |
| Total | | 14,266 | 100 | 3574 | | | | | 3574 |
| Towns | | | | | | | | | |
| Carryduff | 6947 | 2574 | 43 | 695 | 5 | 729.75 | 40.85 | 658.92 | 659 |
| Hillsborough and Culcavy | 3953 | 1729 | 29 | 468 | 20 | 561.6 | 31.44 | 507.09 | 507 |
| Moira | 4584 | 1737 | 28 | 451 | 10 | 496.1 | 27.77 | 447.95 | 448 |
| Total | | 6040 | | 1614 | | 1787.45 | | 1613.95 | 1614 |
| Villages | | | | | | | | | |
| Ahgalee | 863 | 300 | 6.04 | 83.63 | -5 | 79.44 | 5.87 | 81.18 | 81 |
| Annahilt | 1045 | 371 | 7.47 | 103.42 | -10 | 93.08 | 6.88 | 95.10 | 95 |
| Dromara | 1006 | 399 | 8.04 | 111.22 | 0 | 111.22 | 8.22 | 113.65 | 114 |
| Drumbeg | 813 | 321 | 6.47 | 89.48 | -10 | 80.53 | 5.95 | 82.29 | 82 |
| Drumbo | 375 | 157 | 3.16 | 43.76 | -10 | 39.39 | 2.91 | 40.25 | 40 |
| Glenavy | 1791 | 596 | 12.00 | 166.14 | 5 | 174.44 | 12.89 | 178.24 | 178 |
| Lower Ballinderry | 912 | 328 | 6.61 | 91.43 | 0 | 91.43 | 6.76 | 93.42 | 94 |
| Maghaberry | 2468 | 886 | 17.84 | 246.97 | 0 | 246.97 | 18.25 | 252.36 | 253 |
| Milltown | 1499 | 571 | 11.50 | 159.17 | -5 | 151.21 | 11.17 | 154.50 | 155 |
| Moneyreagh | 1379 | 516 | 10.39 | 143.84 | 5 | 151.03 | 11.16 | 154.32 | 154 |
| Ravernet | 564 | 212 | 4.27 | 59.10 | -10 | 53.19 | 3.93 | 54.34 | 54 |
| Stoneyford | 605 | 213 | 4.29 | 59.37 | -5 | 56.41 | 4.17 | 57.63 | 58 |
| Upper Ballinderry | 226 | 95 | 1.91 | 26.48 | -5 | 25.16 | 1.86 | 25.71 | 26 |
| Total | | 4965 | | 1384 | | 1353.49 | | | 1384 |

**ANNEX 2
SITE LOCATION PLAN**



Project:
Gobra Road, Glenavy

Client:
Lotus Homes (UK) Ltd

Drawing Title:
Site Location

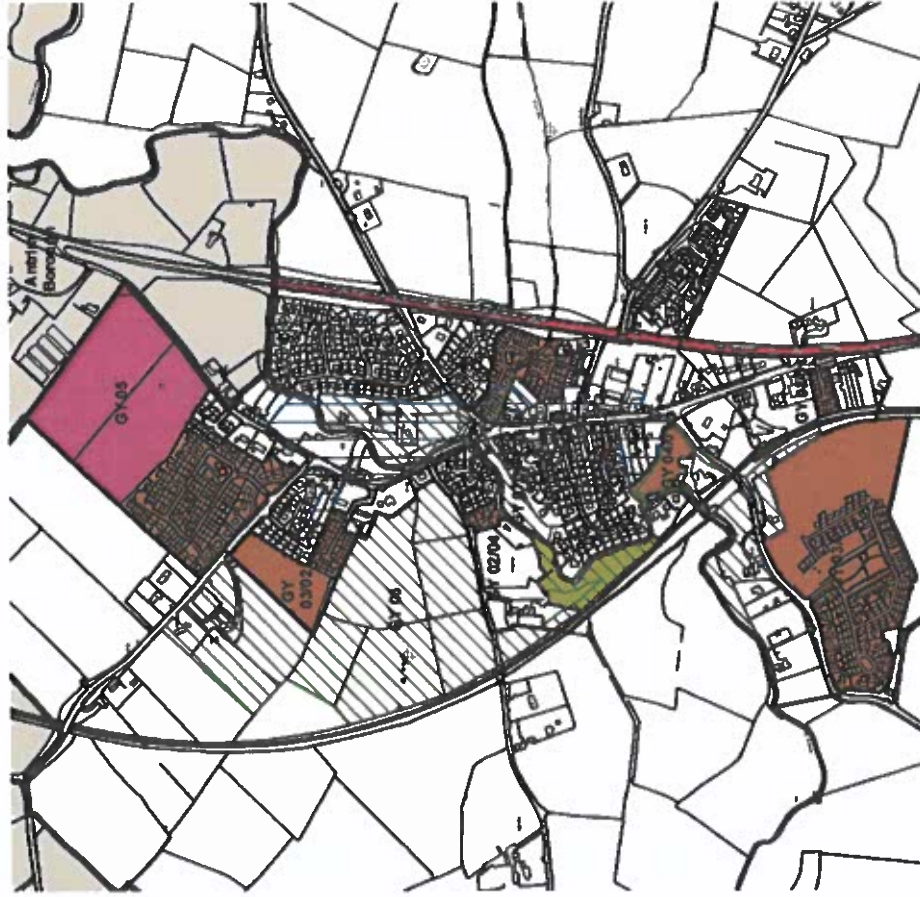
Drawing No:
TSA 2112-001

Date:
December 2019

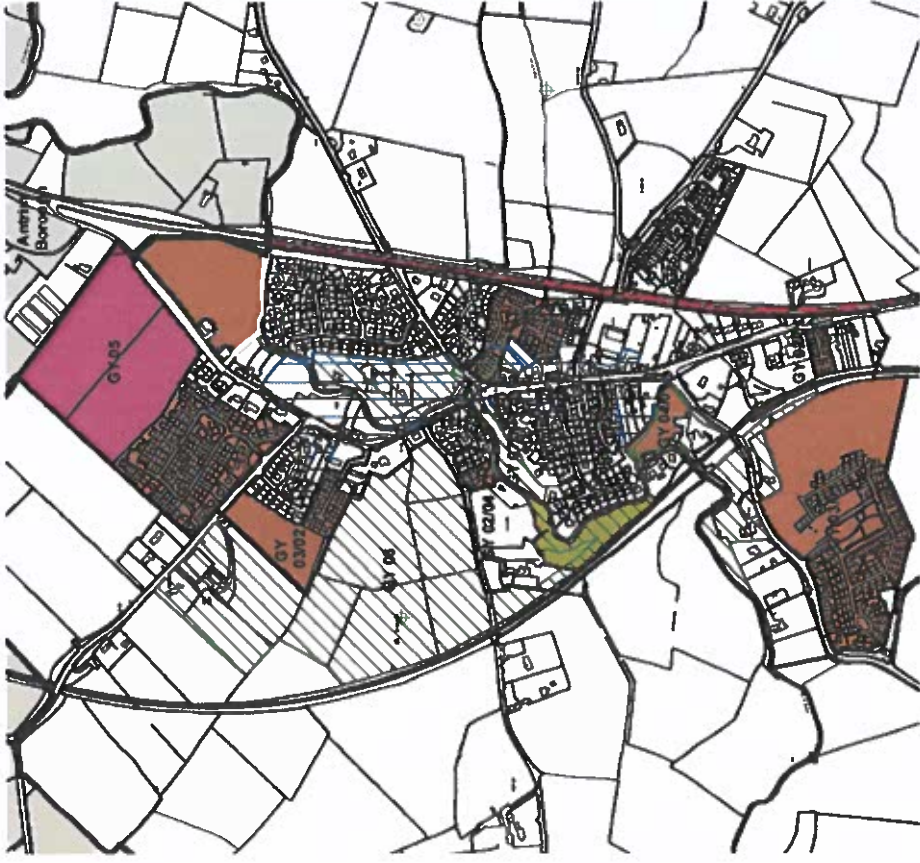
Revision:

20 May Street,
Belfast.
BT1 4NL
T: 028 9043 4333
E: info@tsaplanning.co.uk
W: www.tsaplanning.co.uk

**ANNEX 1
AREA PLAN EXTRACT**



Existing Area Plan



Proposed Area Plan

- KEY**
- Plan Area Boundary
 - Settlement Development Limit
 - Housing Land Use Policy Area
 - Land Zoned For Employment
 - Local Landscape Policy Area
 - Area of Village Character

Project:
Gobrana Road, Glenavy

Client:
Lotus Homes (UK) Ltd

Drawing Title:
Existing & Proposed Development Limit

Drawing No.:
TSA 2.112-003

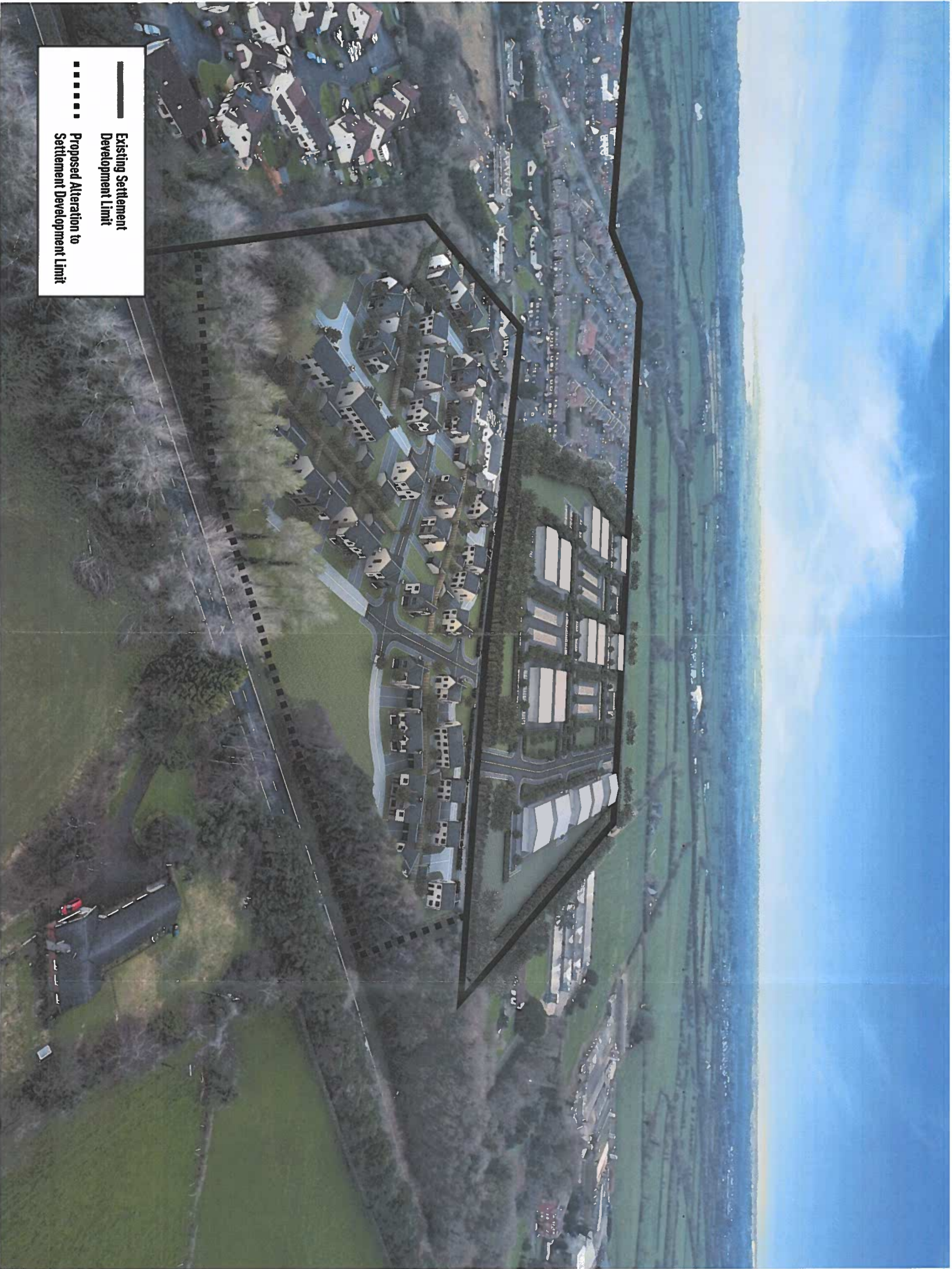
Date:
December 2019

Revision:

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ANNEX 4
POTENTIAL RESIDENTIAL DEVELOPMENT



Existing Settlement
Development Limit

Proposed Alteration to
Settlement Development Limit