

**Local Development Plan 2032 (Draft Plan Strategy
L&C City Council (11.10.19 - 10.01.20)**

WRITTEN REPRESENTATIONS



ON BEHALF OF GHIL

Prepared by:

WPB Ltd

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In connection with the provision of written representations on the Lisburn & Castlereigh City Council Local Development Plan 2032 (Draft Plan Strategy, October 2019).

(Strategic Policies 01 – 24 The Rural Areas)

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1. INTRODUCTION

These written representations on the draft Plan Strategy (PS) are presented on behalf of landowners at Glenavy.

The main objective of these representations is to highlight inconsistency concerns relating to the *Regional Development Strategy 2035* and the soundness of the PS. The representations question the requirement for a more robust evidence base on rural settlements and the consideration of other alternatives (*Consistency /Coherence and Effectiveness Test CE1*).

This submission makes a specific recommendation for an extended 'evidence base' regarding the role and function of key rural settlements to ensure that regeneration options for rural communities are not overlooked at this strategic policy making stage.

This paper also demonstrates how adjustments to strategic policies based upon a full understanding of the role of key rural service centres and their connections with their wider rural hinterland could be made to ensure alignment between future economic and housing needs. This is critical to ensure that the current PS accords with the requirements of the RDS & SPPS in a more appropriately worded format which highlights the strategic ambitions of the PS and L&C Community Plan.

2. GENERAL

Urban/Rural

Whilst the proposed spatial strategy of focusing future housing primarily in the existing urban areas is supported, greater recognition should be afforded within the PS to the essential needs of rural communities across the Council area. Both the RDS and SPPS fully support both urban and rural renaissance.

All six plan objectives (A-F) in the PS relate to the spatial consideration of aspects of urban and rural regeneration. In accordance with the RDS (HEF) & SPPS, the PS and its strategic policies should take account of the particular social and physical characteristics and circumstances of the district in their context (including associated deprivation in specific declining villages, the implications of ageing populations and cross HMA in-migration). This overall approach will provide a spatial expression of how plan objectives and specific targets will be delivered.

Evidence Base

However prior to setting a long term spatial strategy, a robust '*evidence base*' is required based upon a comprehensive review of the relevant RDS HEF tests based on settlement appraisals, settlement specific recommendations. This should inform the PS. Whilst background work has commenced it is clear that only a broad based evaluation has been completed and this has not been used to assist in judgements over spatial policies the allocation of future growth.

Given the dispersed rural settlement pattern within the district the Council should develop a more robust understanding of the existing network of settlements outside of urban areas. This evidence base could identify emerging service roles of both the larger and smaller settlements, movement patterns, accessibility and the projected catchment needs of those living outside rural settlement development limits.

If this review work is not completed and a suitable evidence base provided, key regeneration options for rural communities could be overlooked at this strategic policy making stage and in subsequent stages. This is particularly important in rural settlements where specific problems are currently being experienced and an inadequate supply of housing, employment and associated community infrastructure could be provided to meet identified needs.

The currently suggested strategic housing allocation in Strategic Policy 08 (Table 3) is based solely upon the 'status quo' i.e. existing commitments in rural areas. However the supply of additional housing, employment and supporting infrastructure plays a significant role in shaping rural communities and building the rural economy within the wider framework of sustainable development. Given that urban capacity studies indicate that regional urban brownfield targets (RDS) could be met in urban areas, there should be greater recognition in the PS of the role the development plan process plays in meeting the wider needs of rural areas. This is also particularly important in regard to ensuring the delivery of social and affordable housing in remote settlements.

The wording of the PS (SP08/SP09) should more clearly endorse the Council's stated ambition to utilise opportunities in the landuse planning system at a strategic level to promote regeneration and improve access to essential services by linking limited public and private sector investment. It currently promotes dereliction in urban areas !

The current wording of Strategic Policy 09 could be amended to refer to the specific ambition to achieve rural regeneration where necessary.

An extended evidence base would involve the consideration of the role, function, size and constraints of all defined village settlements including the villages of Aghalee; Annahilt; Dromara; Drumbeg; Drumbo; Glenavy; Lower Ballinderry; Maghaberry; Milltown; Moneyreagh; Ravernet; Stoneyford; Upper Ballinderry.

Site Specific Recommendations

Settlement specific recommendations could also be developed at a later stage (Stage 2) to reflect environmental and resource capacity findings and assumptions over committed residential and employment sites with planning permission. This could also be based in a clearer more transparent process involving detailed scrutiny of listed sites in the housing supply. Current background studies (*Technical Supplements 1-8 & Position Papers incl. L&C : Housing Growth Study*) currently exclude any such consideration. It is self evident, for example, that supporting settlement appraisals are also not fully utilised in current plan making

DPS 2035 recognises that a key step in this housing 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 settlements and countryside. This recognition is not evident in the PS, nor was it apparent, at the earlier POP review stage. This key stage in the allocation process is however identified in paragraph 3.21 of the DPS.

In these circumstances the proposed housing levels to 2035 do not appear as a coherent strategy of policies and allocations that logically flow from a robust evidence base (*Coherence and Effectiveness Test CE1*). Detailed settlement assessments of environmental capacity testing are not available at this stage nor any detailed understanding of the potential linkages and interconnectivity between rural settlements.

In accordance with related guidance a clear evidence base on key rural settlements should be assembled to assess their role in maintaining a strong network of service centres sustaining rural communities across the district. This would be in accordance with the vision and guiding principles set out in the Regional Development Strategy. The absence of this material also raises questions over compliance of the PS with the coherence and effectiveness tests.

Whilst a range of methods and information sources were used by Lisburn and Castlereigh to identify the social and economic needs of people in rural areas this has not translated into tailored strategic policies or a spatial plan as existing commitments and site opportunities have simply been 'grafted' from historic plan making work (BMAP).

The assembled evidence base and associated strategic policies contained in the PS should also take account of prevailing regional policy. This acknowledges that rural areas are a unique and valuable resource and there is a balance to be found between using this resource for economic and social benefits and protecting and preserving it for future generations.

In compliance with the wording of the PS the missing '*evidence base*' on rural settlements should consider the potential servicing role of the larger towns and villages and their ability to bring about connection and service provision between rural and urban areas and rural settlements themselves. It is sometimes necessary to widen the economic base of town, village and countryside, provide support and networking opportunities to encourage the formation of local alliances to exploit complementary resources and facilities.

The fundamental aspiration of bringing about the revitalisation of rural communities is particularly relevant to those towns and villages which have been static or declining in population and contain defined areas of social need (See Settlement Specific Comments). Deprivation can occur many different ways in different settlements. An integrated response between various government departments, local authorities divisions, agencies and communities will ensure that settlement regeneration plans reflect the specific needs of each community.

Settlement specific recommendations could lead to a more targeted expression of L&CCC ambitions including the provision to meet the housing needs of a declining rural community. This could cover a range of possible options from single dwellings to provision for specific groups such as the elderly. As in the larger villages there could a developed link between employment opportunities and housing provision to ensure a sustainable rural community.

The issue of access and connectivity to the rural area is already recognised by L&C CC, both through transport links or information technology. This can also be linked to the issue of rural isolation and how this can be better addressed.

Finally it is self evident that during any difficult economic period the provision of community facilities and statutory facilities to target specific aims, such as youth, education, health and other local services needs to be carefully coordinated at strategic level to ensure effective and efficient community planning. Provision of such facilities leads to a better sense of health and well-being within the rural community.

3. SETTLEMENT SPECIFIC COMMENTS

Even at this Part 1 'strategic' stage, there is a need for the PS to consider the role of effective community planning in rural areas. In preparing LDPs councils must take account of the RDS 2035, the Sustainable Development Strategy for Northern Ireland, the SPPS and any other policies or advice in guidance neighbourhood action plans; regeneration projects, where appropriate.

Villages

There is significant variation in the size of the third order town and village settlements across the district, especially when rural hinterlands are taken into account.

Glenavy and Maghaberry are the largest villages in the district and are located on the A26 north/west of Lisburn. These villages currently have a significant range of services and facilities supporting an extended rural hinterland. They however suffer from acute symptoms of rural decline. Many of their services are in decline especially in Glenavy. It is still noteworthy that levels of community infrastructure reflect the combined size of the village and its rural hinterland rather than what its core population would normally dictate.

Both therefore serve an important existing role as service centres with large rural hinterlands and should support limited economic growth as a place to invest, live and work. Instead they are experiencing a range of settlement specific challenges which the council are aware of but these are not recorded in background topics reports and RDS (HEF) analysis to the PS.

Both villages have high proportions of existing working residents who travel outside of the local authority area for employment given the proximity of the City of Belfast.

Despite existing migration patterns there is potential to manage the settlements to promote and achieve sustainable patterns of residential development in balanced communities based on economic led housing growth. If additional mixed use development was secured in these settlements this could align future housing with jobs growth.

These villages already have committed permissions for over 400 housing units. Whilst Glenavy has a defined social housing requirement for 90 units, Maghaberry has no current social housing need. There are limited but clearly defined opportunities for future housing growth in both Maghaberry and

Glenavy. Clear expansion opportunities exist within the settlement footprints to potentially grow these larger villages over the plan period to 2032. Coupled with existing employment and residential commitments and recent completions these have the potential to revitalise these settlements and manage their functions as key rural service centres.

The collation of additional supporting information on these settlements could enable a more focussed approach to resolving their inherent rural decline. A robust evidence base could be presented at a later stage involve the possible future reclassification of these existing settlements based upon their service centre role.

L&C Council have already undertaken undertaken specific targeted rural regeneration works in these settlements through Action Plans developed by the Economic Development Department. In addition ongoing commitments over highway improvements including narrowing and improved parking (Belfast Road) in Glenavy are awaiting planning approval. Other initiatives for investment in a community centre and additional leisure facilities are being considered at Glenavy to address service its growing population.

The importance of improved services and facilities to the entire community and in particular their impact on the rural area and L&C CC are committed to continue to liaise with key stakeholders for their delivery which is facilitated by the strategies and policies contained in the Local Development Plan (Draft PS). This could involve a managed release of housing land, in line a '*plan, monitor and manage*' approach

Given the existing road (and potential rail) connectivity with Lisburn and Belfast vibrant communities at Glenavy and Maghaberry are well placed to support the network of villages along the A26 and their associated hinterlands. Both are crucially located on a key transport corridor within Belfast Metropolitan area. Crumlin's geographic location also means that its continued expansion would be entirely consistent with the clustering objectives for the main hubs which is recognised in the RDS 2035. These options are not however framed within existing strategic policies although the RDS recognises that there is a need to understand the role and function of rural service centres like Glenavy/Maghaberry and their role in serving rural communities and the importance of promoting co-operation between places. The RDS encourages the linkage of settlements so that services can be shared and do not need to be duplicated. It identifies those settlements within close proximity to each other which have the potential to cluster.

Connections

Potential use of the non-operational former Knockmore Railway Line and improved links to the Belfast International Airport area also offer a significant and ongoing opportunity for the future of Glenavy. Glenavy is already acknowledged in the DPS to be well positioned in terms of Belfast International Airport and its surrounding hinterland which serves as one of the busiest gateways or interchanges in Ireland. This ongoing opportunity has had key implications for economic development along the A26 not least in terms of existing and future employment generation. Economic growth should be matched with housing growth to improve the overall sustainability of the associated settlements.

Table 3 in the supporting text to Strategic Policy 08 (Pgs 52 – 63, dPS) shows the existing housing unit allocation in the plan period to 2032. This strategic approach places an overwhelming reliance on the delivery of existing housing commitments to meet projected housing requirements. However many of the identified sites in rural settlements have stalled and many will not be delivered in the plan period.

However to maintain social cohesion and fulfillment of it's existing role as a Service Centre it is our contention that additional housing growth will be essential to ensure that the acknowledged relationship between settlement size and the levels of service is maintained. Policy RG7 of the RPG recognises the benefits of such approach for strengthening community cohesion (Strategic Policy PS) and should be therefore be fully recognised in the emerging strategy for the PS.

Further growth will serve to encourage sustainable economic growth including additional village centre shopping, commercial and entertainment/recreational uses.

Initial studies suggest that suggested levels of additional housing growth envisaged in larger villages could also take place without causing unacceptable damage to the local character and environmental quality or residential amenity of the settlement. An example of an uncommitted potential housing site is attached in Appendix B. A major housing development has recently been approved outside Maghaberry the defined BMAP settlement boundary. This site is not accounted for in the current settlement estimates.

The potential housing site fronting on to Crumlin Road could also be linked with employment allocated sites to aligned with economic growth. Based on existing housing commitments and emerging site opportunities in both Maghaberry and Glenavy (See Appendix 2) these settlements have the

potential to accommodate future outward growth based on suggested housing levels without significant environmental degradation. This could also be directly linked with rural regeneration initiatives.

This extended level of opportunity to promote community coherence is overlooked in the current PS.

Implementation

Following the introduction of the spatial strategy, policies should be targeted upon the connected delivery of key services to the rural settlements working with key stakeholders with key responsibilities including government departments and statutory agencies. This is of critical importance in developing the Local Policies Plan in Stage 2. In accordance with draft Strategic Policy 07 the use of Section 76 planning agreements would be coordinated with potential developers. There is currently no evidence to suggest that such agreements have been secured in the two settlements mentioned.

L&C City Council will ultimately be responsible for bringing together a number of key functions such as planning, urban regeneration, community plans, local economic development and local tourism. The integration of these functions, combined with councils' existing functions, will allow for a more productive, joined-up approach to community planning which makes the most of opportunities and best uses all the strengths available. The PS is the starting point for this process.

4. OTHER MATERIAL CONSIDERATIONS

Given their population sizes and associated catchment areas many rural settlements are currently at the margin of the threshold to establish a full range of community services and facilities. This should be acknowledged in any assembled evidence base given its implications for the settlement hierarchy and corresponding allocation recommendations.

5. CONCLUSIONS

A clear evidence base is required to fully assess the role of existing rural settlements. Preparation of this robust evidence base would provide confidence, certainty and transparency for all users of the planning system. In short the PS has not carried out an evaluation of existing rural settlements in the district. This could prevent existing towns and villages to maximise its future potential and this is contrary to the expressed aim of the RDS 2030 and previous iterations of the regional strategy (Shaping the Future RDS 2025).

In accordance with related regional guidance rural settlements should be allowed to fulfill their role and thereby maintain a strong network of service centres sustaining rural communities across rural Northern Ireland. This is in accordance with the vision and guiding principles set out in the Regional Development Strategy. In these circumstances this raises questions over the coherence and effectiveness tests.

Strategic Policies in the PS should manage housing growth in response to changing housing need and direct future housing growth to settlements like Crumlin to achieve more sustainable patterns of residential development.

The RDS should inform the spatial strategies of all local development plans. It calls for an adequate supply of land to facilitate sustainable economic growth together with a balanced approach to transport infrastructure.

The DPS should seek to maximise the use of existing infrastructure and service development based on increased catchment populations to enable the evolution of settlements like Glenavy which are safe and inclusive and offer equality of opportunity. Glenavy therefore needs to extend its existing population base in accordance with the expressed objectives of RDS 2030.

Appendix 1 – Extracts Regional Development Strategy 2035

Appendix 2 – Example of Additional Housing Site/s



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