

Place and Economy Department
Planning and Building Control



Belfast
City Council

Your Ref:

Our Ref: 20210311AT/nm
(Please quote at all times)

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Date: 11 March 2021

By email: LDP@lisburncastlereagh.gov.uk

Dear Mr Hughes,

Re: Public Consultation on focussed changes to the draft Plan Strategy

I refer to your recent consultation on the focussed changes to the Local Development Plan draft Plan Strategy and thank you for the opportunity to comment on the documents. I can confirm that Belfast City Council has considered the consultation documents and wishes to provide you with our draft response, please see appended document. This response will be reported to the Strategic Policy and Resources Committee on 19 March 2021 and full Council on 1 April 2021 for ratification.

Should you require any further clarification at this time, please contact Keith Sutherland, Planning and Policy Manager; Tel: 028 9032 0202 ext. 3578 or email sutherlandk@belfastcity.gov.uk.

Yours sincerely



Director of Planning and Building Control

**LCCC Local Development Plan draft Plan Strategy proposed focused changes (published 14/1/21)
LDP Comments to clarify / supplement the previous formal submission to the draft Plan Strategy**

Growth

The Council note that LCCC's focused changes include a revision to the housing growth study to take account of the 2016-based HGI's that were published in September 2019 and that the growth figures have been adjusted accordingly. The overall figure between 2017 and 2032 is now 12,375 dwellings (825 per annum over 15 years), compared to the 2016-based HGI (10,700 or 764 per annum over 14 years), which represents an annual rate increase of 8% above the latest HGI's. This is 4% higher than the annual rate initially proposed relative to the 2012-based HGI.

The above figures have been informed by an adjustment made to reflect the mid-point between the two employment-led scenarios in the Housing Growth Study (as updated), which are based on long and short term trends. However, it is unclear why a mid-point between these two employment scenarios has been taken, other than to seek closer alignment with the revised HGIs. Given that the housing growth originally proposed was based on the adjusted HGI baseline figure, which took account of the differences in plan period covered by the HGI and which was already updated to reflect the 2016-based household projections, it would seem more logical to retain growth on that basis. Using the updated 2016-based HGI figure, adjusted to reflect the different time periods, would seem a more consistent approach to take account of the updated HGIs and should result in a housing requirement of 10,845 units.

However, the Council would also reiterate previous concerns regarding the continuation of unsustainable trends that have been largely based on commuting flows into Belfast for employment. The original housing growth study notes that the labour force ratio, which takes account of commuting for employment, is held constant from 2017 and that the District "is a net exporter of labour" with a "close functional relationship with Belfast." A constant ratio means a rise in real terms of commuting into Belfast, an assumption that will exacerbate the existing congestion and associated problems within the Belfast District. There does not seem to have been any consideration of these cross-boundary implications raised in our previous consultation response.

If the intention of this apparent change in approach is to ensure that housing growth aligns with employment growth, then it would seem more coherent to use one of the two jobs-led scenarios, as amended in the Addendum to the Housing Growth Study. Given the current economic context, it would perhaps be more prudent to take the lower of the two requirements as contained within the short-term jobs-led scenario E. This should result in a requirement for 10,260 net additional dwellings over the plan period. Although this is lower than HGI requirements, we would note that the HGIs are only indicators and should be considered a starting point for assessing housing need rather than a target to be met. To that end, we would refute the statement at p58 of the dPS that the requirement for the Council to ensure that the identified HGI figure can be met.

Given that the Belfast LDP is seeking to accommodate the housing growth associated with its baseline economic growth within its own boundaries, reducing the requirement in the LCCC District to better reflect likely jobs growth in that District would also serve to minimise potential negative implications for Belfast. This is particularly important given the current commuting context and the fact that the majority of housing within the Belfast District will be delivered on previously developed land within the existing urban footprint, as opposed to the less sequentially preferable greenfield land (only 40% is within the existing urban footprint) land and urban extensions delivered at a relatively low density (25-35 dph).

Given this context, we would also question whether the revised Sustainability Appraisal assessment of FC1A and FC1B is appropriate given that there are no resultant changes as a result of the likely increased pressure for greenfield land. This reiterates our comments previously submitted that the overall approach to housing growth in the LCCC plan area is unsustainable.

West Lisburn / Blaris lands

In addition to the general comments above regarding the housing growth, it is notable that the revised 12,375 dwelling requirement over the plan period continues to include a 10% buffer that can accommodate the West Lisburn / Blaris proposals. The Council is disappointed to note this retention as a Strategic Mixed Use site, despite previous concerns in respect of sustainability.

The Council would refer to previous comments made in its submission of 10th January 2020, which noted that the inclusion of a 10% buffer still seems to be driven by the desire to deliver development at West Lisburn/Blaris, rather than being required to meet housing needs over the plan period. As previously articulated, this is contrary to the SPPS sequential test and highlights significant shortcomings that still remain within the sustainability appraisal process.

The Council would reiterate comments from its previous submission, that no alternatives have been assessed from a sustainability appraisal perspective, apart from the Blaris lands as a new policy option. By way of example, no consideration has been given to the scope for an increase of densities above 35dph in the wider urban area, outside of Lisburn City Centre, as an alternative to the delivery of housing in West Lisburn / Blaris, which would better align with the SPPS requirement to deliver increased housing density without town cramming.

Moreover, following the Council's previous comments in relation to the potential of the Maze lands, it is noted that it is now proposed to remove reference to the employment potential of these lands from the Urban Capacity Study (Minor Change MC67). We are not clear how this helps address the concerns previously raised by this Council given that, whether or not the 141 ha of land are referenced in the Urban Capacity Study, LCCC have not assessed the potential to use these lands to meet housing or economic development needs. The Council would contend that these brownfield lands should be fully assessed as a potential alternative to the Blaris lands, in line with the sequential approach advocated in the SPPS, in the context of future sustainable economic development.

The intention to retain the Blaris lands is also considered at odds with the statement made at the end of section 7, page 61 of the focussed changes document that *'The Strategic Housing Allocation presented in Table 3 negates the need to provide any greenfield extension to allow for future housing growth'*. Clearly, the Blaris lands are a significant greenfield expansion of the existing settlement, which when taken alongside the fact that only 40% of housing sites are considered to be within the existing urban footprint is highly misleading. The Council would contend that the 10% buffer should be removed from the overall housing allocation, which would reduce the need for housing at West Lisburn / Blaris and therefore address some of the concerns previously raised in relation to the sustainability appraisal process.

The Council remains concerned that transportation issues relating to the West Lisburn / Blaris lands have not been adequately considered or addressed particularly with regard to the 'significant additional commuting traffic on the M1 to Belfast' that DfI have highlighted in the Lisburn and Castlereagh Local Transport Plan – Transport Study (para 2.11.4, pg17, [TS8](#)). There does not appear to be any robust, quantitative evidence demonstrating that the potential transport implications this proposed mixed use site will have on the transport network have been considered and the potential impact this will have on a neighbouring council.

Similarly, despite the assertion that this site is a 'highly accessible location' ([POP](#), pg 78) there doesn't appear to be any specific accessibility analysis to substantiate this or demonstrate that Blaris is significantly more accessible than any other Lisburn City site.

Density

Further to the Council's letter of 10th January 2020 to the consultation on the draft Plan Strategy, which outlined some concerns in relation to density levels, the Council notes the proposed rewording in respect

of densities within policy HOU4 (FC5B). However, the Council considers that further clarification is needed, in particular in terms of density levels to be used within the Greater Urban Area.

Whilst we recognise that existing densities are lower in the LCCC District than the Belfast District, it would seem prudent to prevent any barriers to higher density development in appropriate locations. The Belfast LDP has proposed a density band of 25-125 dph within the outer city, which forms a continuous built-up area with the Lisburn and Castlereagh Greater Urban Areas. Whilst such a large range may not be appropriate for the LCCC District, we would suggest that the upper limit should be removed or increased for land, particularly within the Greater Urban Area.

As previously advised, increasing the density of development in appropriate locations would represent a more sustainable option for future growth and avoid or reduce reliance on more peripheral sites. Such an approach would also assist the increase in the amount of new housing being delivered within the urban footprints of LCCC settlements, noting the RDS target of 60% to be accommodated within existing urban areas.

Affordable Housing

The Council notes the revision to affordable housing need over the Plan period and welcomes the adjustment to reflect up to date evidence of prevailing need. The proposed revision to policy COU5, to require proposals for affordable housing located outside settlement boundaries to demonstrate that need cannot be met within the settlement, is also supported.

Adaptable Housing

The proposed change to amend the second sentence of criteria e) of Policy HOU4 (MC13) is noted as follows: *“The design of dwellings should ensure they are capable of adaptation to provide accommodation that is wheelchair useable accessible for those in society who are mobility impaired.”*

The Council would caution against an approach which moves away from dwellings being capable of modification for occupation by wheelchair users, to relating solely to access. The Council’s approach on this issue sets out a clear focus on ensuring that homes are accessible for those who live in them, and the evidence points towards an increasing need for accessible and adaptable accommodation into the future.

Knockmore Link

The Council’s concern that the new Knockmore Link is described as key to unlocking the development potential of the West Lisburn / Blaris lands, rather than improving public transport access, has not been taken on board. In fact, following a submission from DfI Transport, the wording around this under Strategic Policy 20 has effectively been diluted:

“In addition the Local Transport Study will seek to adopt a range of measures to reduce the need for reliance on the private car through the allocation of residential zonings in proximity to services consider the strengths and weaknesses of various modes of transport, including walking, cycling, public transport and roads. This will provide clarity on the transport measures that DfI expect to deliver during the LDP period to 2032 and which will become evident at Local Policies Plan stage.”

The Council would stress the importance of enhancing accessibility by sustainable transport modes, such as bus and rail, and active travel modes such as walking and cycling, with the need to reduce single occupancy car journeys. We would strongly encourage an approach which promotes more sustainable patterns of transport and travel in line with the SPPS (para 6.293) which not only will reduce the impact on the highway network in terms of addressing commuting-based congestion but also contribute to improvements in air quality arising from reduced vehicular emissions and associated health benefits for society (SPPS para 6.294). Facilitating opportunities for modal shift through improvements in sustainable transport infrastructure which in turn gives people greater choice about how they travel should be the priority here. In this context, the status of the West Lisburn (Knockmore) rail halt should be clarified and given appropriate recognition in the Plan.

Sprucefield

The Council welcome the intention to remove criteria b) from Strategic Policy 14 that sought to support Sprucefield Regional Shopping Centre in recognition of its regional status in accordance with key site requirements (FC2). This focused change aligns this policy with a town centre first approach to retail investment, as recommended in the SPPS. In this regard, the Council also support the proposed amendment to policy TC1 to clarify the application of a sequential approach

The Council note the correction of existing gross external retail floorspace to 44,750 square metres. However, concerns remain with policy SMU03, which enables an additional 50,000 square metres gross external floor space to be permitted at Sprucefield (25,000sqm of which is unrestricted retail floorspace). The separation of Sprucefield from the retail hierarchy within the dPS, continues to raise significant concerns that the policy approach would have a significant adverse impact on the vitality and viability of both the Lisburn and Belfast city centres. The Council would again refer to the Addendum to its submission of 10th January 2020 in this regard.

Policy TC3

A change has been proposed to TC3, to remove reference to proposals for town centre uses outside of town centres not having an adverse impact on the role and function of the town centre as a result of the proposal (MC27). This appears to dilute the original policy intent to protect town centres and only allow development that does not have adverse impact on adjacent land uses. Any proposals for town centre uses outside of town centre locations must ensure there is no adverse impact on the vitality and viability of centres within the proposals whole catchment that may include centres outside its council boundary

Further minor points for info

- Policy HOU1 on new residential development is being amended to make provision for housing as part of mixed-use development, with LCCC citing the DfI submission (DPS-109) which asked the Council to consider the relationship between HOU1 and SMU01 (West Lisburn / Blaris) and any other strategic mixed-use zonings.
- 'Cycling' has been added into criteria c) of policy TRA 1 on creating an accessible environment, in response to DfI submission. This ties in with the proposed change to SP20 in reference to the Local Transport Study that it will '*consider the strengths and weaknesses of various modes of transport, including walking, cycling, public transport and roads*'.
- Note for policy HOU11 on specialist accommodation, clarifying its purpose and removing reference to '*retirement villages*'.

END