

# LISBURN AND CASTLEREAGH LOCAL DEVELOPMENT PLAN 2032

CFC-014

## Draft Plan Strategy Focussed Changes Representation



**March 2021**



## **A Representation to Lisburn and Castlereagh City Council’s Focussed Changes including Minor Changes Schedule to the Draft Plan Strategy (Local Development Plan 2032)**

### **1. Introduction**

- 1.1 This representation has been prepared by **TSA Planning** on behalf of our client , in respect of Lisburn and Castlereagh City Council’s published Focussed Changes Addendum including Minor Changes Schedule to the Draft Plan Strategy (DPS), for their Local Development Plan 2032.
- 1.2 Our original representation to the Draft Plan Strategy (Ref: **DPS-071**) raised concerns regarding the soundness of DPS Policies SP08 (Housing in Settlements) and HOU10 (Affordable Housing in Settlements). For ease of reference, this representation will review the Council’s proposed Focussed and Minor Changes in the context of our original submission, to determine whether any of our previous concerns have now been addressed by the Council in respect of Policies SP08 and HOU10. We have also reviewed the remainder of the Council’s focussed and minor changes to ensure that these proposed changes do not render any other policies unsound. We shall identify and make comment on same where appropriate.
- 1.3 It is important to note that our comments in respect of the proposed focussed and minor changes, solely relate to the proposed focussed changes addendum and minor changes schedule. The full commentary provided in our original submission has not been repeated within this representation and no new comments are made in respect of the original Draft Plan Strategy. However, as identified within this representation, Sections 3 and 4 of our original submission remain valid and should be considered at Independent Examination, together with the commentary provided within same.

### **2. Consideration of Focussed Changes and Minor Changes to Policy SP08 - Housing in Settlements**

- 2.1 The Council proposes 4 no. changes to Policy SP08 including FC1A, FC1B, MC3A and MC3B. **Focussed Change FC1A** and **Minor Change MC3A** relate to the projected need for social/affordable housing and bring the definition of affordable housing in line with the SPPS. **Minor Change MC3B** updates Table 1 to include a percentage of the population residing in the countryside. We have no further comments to add in respect of changes FC1A, MC3A or MC3B.
- 2.2 **Focussed Change FC1B** includes amendments to the Strategic Housing Allocation Figure and amends Table 3 (Page 64), the relating text (Pages 58 to 63, Part 1) and Addendum to Technical Supplement 1. The content of this focussed change has a direct bearing on the content and



consideration put forward in our original DPS representation, which set out the tests of soundness and suggested amendments to Policy SP08 under the following headings:-

- Strategic Housing Allocation Figure (Section 2); and
- Allocation to Settlements (Section 3)

For clarity and ease of reference, we consider below the Council's proposed revisions, made as a result of **Focussed Change FC1B**, against the same headings.

#### *Strategic Housing Allocation Figure*

- 2.3 Under **Focussed Change FC1B**, the Council propose to amend the overall Strategic Housing Allocation figure to 12,375 dwellings.
- 2.4 Within our original submission, Section 2 of our representation considered the Strategic Housing Allocation Figure to be unsound in respect of Soundness Tests C1; C3; CE2; and CE4. To this end, we suggested an amendment to the Strategic Housing Allocation Figure, to take account of the best available evidence and to allow for changing social and economic circumstances.
- 2.5 Our DPS representation (Section 2) suggested amending the Strategic Housing Allocation Figure to 12,260 units. Accordingly, we consider **Focussed Change FC1B** addresses our previous concerns in respect of the Strategic Housing Allocation Figure through the use of the best available evidence and allowing for changing social and economic circumstances.
- 2.6 Therefore, we now believe the Strategic Housing Allocation Figure to be sound in respect of Soundness Tests C1; C3; CE2; and CE4 and Section 2 of our original representation to the DPS can now be discounted.

#### *Allocation to Settlements*

- 2.7 In respect of SP08 Allocation to Settlements, **Focussed Change FC1B** proposes amendments to Table 3 within Annex 1, and the associated figures within Pages 59 to 63 of the DPS. This change updates the remaining potential unit figures within Table 3, following the use of updated Housing Monitor Statistics from 2017 data to 2019, taking into account housing completions between 2017 and 2019. Subsequently, the remaining potential figures within Table 3 and on Pages 59 to 63 of the DPS have been reduced. We find the use of 2019 Housing Monitor data to be appropriate, as it makes use of the most up to date evidence base.
- 2.8 However, we considered the SP08 Allocation to Settlements to be unsound based on Soundness Tests C1; C3; CE1; CE2; and CE4 for various other reasons set out within our DPS representation.
- 2.9 Whilst we welcome the use of a more up to date evidence base (2019 Housing Monitor), **Focussed Change FC1B** does not correct any of the inaccuracies with the methodology when considering the 2019 Housing Monitor Statistics, such as the consideration of "live" planning



permissions. As such, the figure of 7,311 committed units on Page 59 and the overall remaining potential figures within Table 3 remain unsound.

- 2.10 Therefore, **Focussed Change FC1B** does not address our Suggested Amendments 1 to 4 within Section 3 of our original submission and as such Policy SP08 Allocation to Settlements remains unsound in respect of Soundness Tests C1; C3; CE1; CE2; and CE4. Our concerns remain valid and should be considered at Independent Examination, together with the commentary provided within our original Draft Plan Strategy representation.

### **3. Consideration of Minor Changes to Policy HOU10 – Affordable Housing in Settlements**

- 3.1 **Minor Change MC17** proposes a minor change to Policy HOU10 to amend part b), paragraph 6 of Policy HOU10 to include reference to the NIHE. We note the reasons for making this minor change.

- 3.2 Section 4 of our DPS representation found Policy HOU10 to be unsound in respect of Soundness Tests CE1; CE2; and CE4 and made three suggested amendments to make this Policy sound. The Council's proposed **Minor Change MC17**, in respect of Policy HOU 10 does not address our Suggested Amendments 1 to 3 within Section 4 of our original submission and as such we believe Policy HOU 10 Affordable Housing in Settlements remains unsound in respect of Soundness Tests CE1; CE2; and CE4.

- 3.3 Therefore, Section 4 of our original submission, and the associated Suggested Amendments (1 to 3), is still valid and should be considered at Independent Examination, together with the commentary provided within our original Draft Plan Strategy representation.

### **4. Conclusions**

- 4.1 In conclusion, this representation has assessed the published Focussed Changes Addendum and Minor Changes Schedule in respect of Lisburn and Castlereagh City Councils Draft Plan Strategy. For ease of reference the representation has been structured in the context of our original DPS representation. However, our comments made in respect of the proposed focussed and minor changes, solely relate to the proposed focussed and minor changes. The commentary provided in our original submission has not been repeated within this representation and no new comments were made in respect of the original draft Plan Strategy.
- 4.2 This representation identifies that some of the proposed Focussed and Minor Changes are welcomed, and are found to be sound. However, our suggested amendments within Sections 3 and 4 of **DPS-071** remain valid and should continue to be considered at Independent Examination, together with the commentary provided within same.