

Planning LDP Team
 Lisburn and Castlereagh City Council
 Local Planning Office
 Lagan Valley Island
 Island Civic Centre
 The Island
 Lisburn
 BT27 4RL

BY E-MAIL

10th January 2020

Our ref: CAR1004

Dear Sir/Madam,

RESPONSE TO LOCAL DEVELOPMENT PLAN 2032 – DRAFT PLAN STRATEGY

We write in response to Lisburn and Castlereagh City Council's ("the Council") recently published draft Plan Strategy (dPS) for the emerging Local Development Plan ("LDP") on behalf of our clients, John Thompson & Sons Limited ("JTS"). Our response relates to Strategic Policy 11 'Economic Development in Settlements' in Part 1 of the dPS and Operational Policy ED7 'Retention of Zoned Land and Economic Development' in Part 2 of the dPS.

In addition, we have provided a map identifying JTS's lands at Moira Rd Lisburn on an OS base, along with commentary on these lands. JTS would wish to bring forward these lands through the Local Policies Plan ("LPP") for residential development within the Plan period. However, should that not happen they are engaging now in the dPS to ensure that a sound strategy and policy-base is delivered in the final PS for development on unzoned land used or last used for industry in settlements.

We provided a response regarding these lands previously to the LDP team and attach this again as the points remain valid.

Strategic Policy 11

JTS welcomes Strategic Policy 11, and in particular point c), which seeks to encourage mixed use schemes supporting regeneration on sites previously used for economic purposes.

There are a significant number of sites throughout the Council area that were last used for industry but are no longer in active use. Many of these sites do not have buildings on them that would be fit for modern purposes and would require significant redevelopment that cannot be economically justified in current market conditions.

There are also many of these sites that are located adjacent to existing housing where it is no longer appropriate for general industry to be carried out as it would have an unacceptable detrimental impact on residential amenity and make any industrial business too constrained to be viable.

Strategic Policy 11 should recognise within the Justification and Amplification that on such sites it is appropriate to allow mixed use proposals to come forward where these will deliver a proportionate amount of light industry, or other business units that will not be detrimental to residential amenity, as part of a wider scheme that includes sufficient other types of development, including housing, as a catalyst to regenerate a site and ensure that the business units are realised.

Operational Policy ED7

JTS broadly supports this proposed operational policy, which seeks to retain the additional flexibility on previously developed, unzoned industrial land that was introduced in the Strategic Planning Policy Statement.

With respect to criterion b) for unzoned land in settlements, the wording should be amended to take account of market reality that in the majority of cases the reason these sites are no longer in industrial / business use is because those uses are no longer economically viable or are compromised for some other reason such as size / location / proximity to existing sensitive receptors.

Including the wording '*and which will bring substantial community benefits that outweigh the loss of land for economic development use*' create a high bar for mix use proposals to overcome, particularly where it is very likely the non-industrial uses will usually have to subsidise the industrial element that the policy requires to remain a significant element. It is also unhelpful that the Justification and Amplification provides no examples of what might be considered to be a substantial community benefit.

In terms of mapping industrial and business sites as part of the Plan process, the Council should ensure that there is no ambiguity between lands/buildings that are zoned for industrial purposes that would fall to be considered against the first part of the policy (Zoned Land in all Locations), and sites that fall to be considered against the second part of the policy (Unzoned Land in Settlements).

There was ambiguity introduced within BMAP whereby all industrial sites, whether existing or proposed and whether or not they had buildings on them, were identified with a pink wash on the associated maps. This caused confusion as to whether or not the sites identified with the lighter shading, described in the key as 'Existing Employment / Industry', fell to be considered as zoned land in policy terms.

We would request that if it is the Council's intention to identify existing industrial / business sites within the Plan area, that it is made clear and unambiguous that this is for clarification purposes and that this does not constitute a zoning in policy terms, ie. they should be assessed as unzoned land in the context of Policy ED7.

Lands at Moira Rd, Lisburn

Background

JTS own lands opposite Beechfield Mews, Moira Road, Lisburn that extend to approximately 3.6 hectares (8.9 acres). These are outlined in red on the site location plan at Annex 1. It is JTS's desire that these lands are zoned for housing within the emerging LDP. Furthermore, our client would intend to develop out the lands for housing during the lifetime of the emerging LDP.

Planning Context

The lands are currently located within the settlement limit of Lisburn City as shown in the draft Belfast Metropolitan Area Plan 2015 (dBMAP).

Within dBMAP the lands are identified as Existing Industry / Employment (Designation LC14). This is in part incorrect as the lands to the rear are not and have never been used for industrial purposes – the rear of the site comprises a grass field.

Lands to the west form part of the same Existing Industry / Employment area and comprise two separate developments – Flush Park Industrial Estate which accesses out to the west onto Knockmore Road and Knockmore business Park which accesses onto the Moira Road.

The lands to the east and south are not zoned for any purposes and comprise existing suburban housing developments.

To the north of the site dBMAP identifies a site for a new Park & Ride (Zoning LC 19) on the other side of the railway line, however, this has been predominantly developed out for housing.

Site

The site extends to approximately 3.6 hectares and is irregular in shape. The site is relatively flat, rising gently from the Moira Road to the railway line at the rear. The front two-thirds of the site comprise an animal feed mill, whilst the rear third is undeveloped grassland. The site is accessed from the Moira Road.

The existing mill buildings are very large and tower over the adjacent housing development of Rosevale Meadows. There is a more modest two storey office building fronting onto the Moira Road that is finished in red brick, and it is serviced by a car park between it and the Moira Road.

Although the front portion of the site is identified in dBMAP as existing employment land, it is not currently in use as such. When the business was in operation it was subject to complaints from neighbouring residents due to noise and odour emissions. It is also very clear from visiting Rosevale Meadows that even without the business currently operating, the mill buildings have a very dominant effect on the existing dwellings due to their size, height, finishes and proximity to the rear boundaries of the dwellings.

Surrounding Context

As stated above, the site forms part of a wider existing employment zoning which is predominantly comprised of the Flush Park industrial estate to the west, which accesses onto the Knockmore Road, and a row of business units fronting Moira Road with their own separate access. However, despite being all contained within the same Existing Industry / employment designation, the three sites are visually and physically discrete, with all having separate accesses to the public road and no vehicular or pedestrian connections between them.

The local area is well-served by a number of large areas of zoned or developed industrial / employment land. These include the lands at Blaris to the south, the Knockmore Hill Industrial Estate to the north west, Knockmore Industrial Estate to the west and Lissue Industrial Estate further to the west. The loss of one site of 3.6 hectares would not be significant given this context.

Furthermore, given the poor existing relationship between our client's site and existing housing, the site is not suitable for general industry, even though that is the long-established use and it was last used as such relatively recently.

Proposals

There is an opportunity for the site to be re-zoned away from existing employment to a more suitable use. Our client wishes to see the site re-zoned for housing. This would remove a very significant blight on the existing residents in Rosevale Meadows and unquestionably be warmly welcomed by them.

Furthermore, developing new housing on the site would enable the careful consideration and design of the relationship between the site and the other operational employment uses adjacent at Flush Park and Knockmore business Park. By providing effective boundary screening and open space / buffer planting along the boundary a more acceptable residential / employment interface can be created. This could be secured through the application of Key Site Requirements to the housing zoning.

The site also provides the opportunity to deliver a pedestrian connection to the proposed Knockmore rail halt and associated Park & Ride.

Summary

JTS welcomes the Council's strategic and operational policy approach to the redevelopment of unzoned industrial sites within settlements.

However, the strategic proposals can be further improved and refined through recognising that on such sites it is appropriate to allow mixed use proposals where these will deliver a proportionate amount of light industry as part of a wider scheme that includes sufficient other types of development, including housing, as a catalyst to regenerate a site and ensure that the business units are realised.

In relation to the operational policy, we would request that the wording is amended to take account of market reality that in the majority of cases the reason these sites are no longer in industrial / business use is because those uses are no longer

economically viable or are compromised for some other reason, and that it is too onerous to expect developers to subsidise both light industrial units on a significant portion of the site and deliver significant community benefits.

In addition, if it is the Council's intention to identify existing industrial / business sites within the Plan area, that it is made clear and unambiguous that this is for clarification purposes and that this does not constitute a zoning in policy terms

With respect to JTS's lands at Moira Rd, we would respectfully request that these are zoned for residential development in the emerging Local Development Plan for the strategic and site-specific reasons outlined above.

We believe there is a compelling case for the lands to be re-zoned as housing to assist the Council in increasing the amount of housing delivered within the Urban Footprint, and it will significantly improve and protect the amenity of existing residents while providing the opportunity to create a new, carefully considered interface between new housing on the site and the remainder of the existing employment zoning.

Given the size and nature of the site and the supply of employment land remaining within BMAP, its re-zoning will not have a significant impact on the overall availability of a range of employment sites within Lisburn City.

Planning Director

Encs.

cc. John Thompson & Sons Limited

Annex 1 – Site Location Plan



Planning LDP Team
Lisburn and Castlereagh City Borough Council
Local Planning Office
Lagan Valley Island
Island Civic Centre
The Island
Lisburn
BT27 4RL

BY POST AND E-MAIL

17 April 2019

Our ref: CAR1004

Dear Sir/Madam,

REPRESENTATION TO LOCAL DEVELOPMENT PLAN

LISBURN AND CASTLEREAGH CITY BOROUGH COUNCIL

We write on behalf of our client, W&R Barnett Ltd, in relation to the Council's on-going preparation of the new Local Development Plan. This letter relates to the strategic themes of housing and employment, and also our client's lands located at Moira Road, Lisburn – see attached map at Annex 1.

Enabling Sustainable Communities and Delivery of New Homes

Housing Allocation

The Council's housing growth strategy, including the allocation of housing, has been informed by the Regional Development Strategy 2035 (RDS), the Council's Preparatory Papers, existing Area Plans and population / household projections.

The Preferred Options Paper published by the Council in March 2017 identified the HGI figures produced in April 2016 by DfI of 9,600 dwellings for the Council area for the period 2012 to 2025. It states that this equates to 738 units per year and when applied to the LDP period of 2015 – 2030 equates to 13,300 new dwellings being required.

However, we note that in the Council's response to the POP the LDP is stated as running to 2032, adding another 1,476 dwellings to give a total of 14,776 new dwellings being required to the end of the extended Plan period.

The HGI figure is for guidance. It is not a cap or a target to be achieved and there may be occasions when a Council can allocate more than the stated figure if this can be justified given the particular circumstances of the individual council. This

is reinforced by the RDS itself at page 100, which states that the figures are "*produced as a guide for those preparing development plans*" and the Strategic Planning Policy Statement (SPPS) reinforces this at paragraph 6.139.

Unfortunately, the Council has not gone beyond identifying the HGI figure to apply this to the specific circumstances of the Council. Nor has it fully considered the evidential basis for the HGI, which gives too much weight to housing figures from the recent recession, which severely depressed housing completions in the period between 2009 and 2015.

We believe that the POP should have explored the proposed housing allocation in greater detail including articulation of the evidence base, identified three clearly different options for growth and confirmed the Council's preferred option.

Furthermore, it is anticipated that the LDP process will not be complete until the end of 2024 based on the Council's own revised timetable. Considering that this in itself is optimistic given how other Councils whose POPs that were published in late 2016 / early 2017 are already over a year behind on the anticipated publication of their draft Plan Strategies, we believe that it would be more appropriate for the LDP period to cover the period out to 2035, rather than 2032. This will ensure that there is a period of at least ten years between the LDP being fully adopted and its notional end date.

When all of the above matters are taken into account, we believe that the use of the HGI figure for the purposes of housing allocation will be an under estimation of the required housing for the Council area over the LDP period and in developing the draft Plan Strategy the Council should consider the above factors in greater detail before settling on a figure.

Housing Distribution

The POP acknowledges that the RDS sets objectives around population growth including focusing growth on the main Hubs, whilst sustaining rural communities. It is further acknowledged that the RDS seeks to achieve 60% of new housing allocations within the Urban Footprint of settlements with a population of 5,000 or greater.

The POP confirms that there is currently insufficient land within the Urban Footprints in the Council area to achieve, or even come close to this figure. Based on completed surveys there is the potential to accommodate 2,162 dwellings, which would only equate to 16% of the pro-rata HGI allocation between 2015 and 2030. A total of 7,908 dwelling would be required within Urban Footprints over this period to meet the 60% target.

In relation to the three options presented by the council for the distribution of housing across settlement hierarchy, we agree in principle with Option 2A being the Preferred Option. However, we believe that reference should have been made to the RDS target of 60% of new housing being accommodated within the Urban Footprint and acknowledgement that the Council would look at ways in which the 16% identified could be improved upon.

Driving Sustainable Economic Growth

Existing Employment Land

Within the Council area there are 283 hectares of existing employment land and it is stated that only 2 hectares of this remains undeveloped. The amount undeveloped is unsurprising given that the reason for lands being zoned as such in the Belfast Metropolitan Area Plan (BMAP; adoption quashed) was that they were already developed for employment purposes.

However, what this does not identify is how much of that development is under or not utilised, ie. how many of the buildings on those lands are actually in active employment uses.

In relation to land zoned for employment that were partly or wholly undeveloped, this amounted to 264 hectares. Tellingly, only 5 hectares of this land, or 3%, has been developed. There is therefore 547 hectares of employment land in the Council area, of which nearly half (261 hectares) is not being utilised. Furthermore, as described above it is unknown how much of the existing employment land is in active employment use.

This must be set against the anticipated need for 130 hectares of additional employment land over the plan period, half of the amount remaining undeveloped through BMAP allocations. The current zonings are therefore more than adequate to accommodate the anticipated demand.

Within the 283 hectares of existing employment land, there are likely to be a number of sites that are not in active employment use, and it may be there are good reasons for this beyond simple market forces. Where there are other reasons for the under-utilisation of existing employment sites, these should be explored by the Council as they may provide opportunities to allocate further housing opportunities within the Urban Footprint, and contribute further towards the RDS target of 60%, without having a significant impact on the amount and variety of employment sites available.

Lands at Moira Rd, Lisburn

We believe that our client's lands at Moira Rd, Lisburn, opposite Beechfield Mews, comprises one such site (see Site Location Plan at Annex 1). The site extends to approximately 3.6 hectares and is irregular in shape. The site is relatively flat, rising gently from the Moira Road to the railway line at the rear. The front two-thirds of the site comprise an animal feed mill, whilst the rear third is undeveloped grassland. The site is accessed from Moira Road.

The existing mill buildings are very large and tower over the adjacent housing development of Rosevale Meadows. There is a more modest two storey office building fronting onto the Moira Road that is finished in red brick, and it is serviced by a car park between it and the Moira Road.

Although the front portion of the site is identified in BMAP as existing employment land, it has not been used as such for a few years. When the business was in operation it was subject to a complaints from neighbouring residents due to noise and odour emissions. It is also very clear from visiting Rosevale Meadows that even without the business currently operating, the mill buildings have a very dominant effect on the existing dwellings due to their size, height, finishes and proximity to the rear boundaries of dwellings.

In relation to BMAP zoning the site as existing employment, as explained above the site is not currently in operation. It forms part of a wider existing employment zoning which is predominantly comprised of the Flush Park industrial estate to the west, which accesses onto the Knockmore Road, and a row of business units fronting Moira Road with their own separate access. Neither of these sites has a vehicular or pedestrian connection into our client's site.

The local area is well-served by a number of large areas of zoned industrial / employment land. These include the lands at Blaris to the south, the Knockmore Hill Industrial Estate to the north west, Knockmore Industrial Estate to the west and Lissue Industrial Estate further to the west. The loss of one site of 3.6 hectares would not be significant given this context.

Furthermore, given the poor existing relationship between our client's site and existing housing, the site is not suitable for general industry, even though that is the long-established use and it was last used as such relatively recently.

There is an opportunity for the site to be re-zoned away from existing employment to a more suitable use. Our client wishes to see the site re-zoned for housing. This would remove a very significant blight on the existing residents in Rosevale Meadows and unquestionably be warmly welcomed by them.

Furthermore, developing new housing on the site would enable the careful consideration and design of the relationship between the site and the other operational employment uses adjacent at Flush Park and the business units fronting Moira Road. By providing effective boundary screening and open space / buffer planting along the boundary a more acceptable residential / employment interface can be created. This could be secured through the application of Key Site Considerations to the housing zoning. The site also provides the opportunity to deliver a pedestrian connection to the proposed Knockmore rail halt.

Summary

We would respectfully request that our client's lands at Moira Rd, Lisburn are zoned for residential development in the emerging Local Development Plan for the strategic and site-specific reasons outlined above.

We believe there is a compelling case for the lands to be re-zoned as housing to assist the Council in increasing the amount of housing delivered within the Urban Footprint, and it will significantly improve and protect the amenity of existing residents while providing the opportunity to create a new, carefully considered interface between new housing on the site and the remainder of the existing employment zoning.

Given the size and nature of the site and the supply of employment land remaining within BMAP, its re-zoning will not have a significant impact on the overall availability of a range of employment sites within Lisburn City.

I trust the above is helpful to the Council in progressing the draft LDP and look forward to further input as appropriate as the Plan progresses.

Yours Sincerely,

Planning Director

Encs.

cc.

W&R Barnett Ltd