



**Local Development Plan Team**

Lisburn and Castlereagh City Council  
Civic Headquarters  
Lagan Valley Island  
Lisburn  
BT27 4RL

9<sup>th</sup> January 2020

By Post & Email

**Re: Representation to the Lisburn and Castlereagh City Council Draft Plan Strategy - Lands to South East of Moira Industrial Estate, Lisburn**

This response is a site-specific representation on behalf of [REDACTED], who owns the lands immediately adjacent to the settlement of Moira. The land is depicted on the accompanying OS Map and aerial image overleaf.

The subject lands comprise a 2.8 hectares (yielding 70 dwellings based at density of 25dph) area of land immediately to the south east of the existing Settlement Development Limit (SDL) of Moira, as per Designation MA01 in BMAP 2015, which is depicted on Map No. 5 – Moira. The Councils LDP makes note that within the Plan Strategy that any reference made to 'BMAP' refers to the post-examination form of that document as this Plan was subsequently declared unlawful following a successful legal challenge and therefore remains in its entirety unadopted. However, BMAP in its post-inquiry forms was at an advanced stage and therefore remains a material consideration.

There are no environmental designations that are applicable to the subject lands and they have access to Lurgan Road.

BMAP 2015 zoned twenty-four housing sites, within the Settlement Development Limit (SDL). This totalled approximately 43 hectares of land for housing in Moira within the Plan period. In addition to this, there is currently several "live" housing consents that have been granted, on the adjoining land as follows (See Appendix 5);

- S/2014/0557/F – Demolition of existing dwellings and construction of housing development comprised of 20 No. detached dwellings, 12 No. semi-detached dwellings – lands adjacent to 33 Lurgan Road, Moira, BT67 0LX – Granted 25/09/2018
- LA05/2017/0572/F – Housing development of 8 No. dwellings – 49 Lurgan Road, Moira – Granted 13/02/18
- LA05/2015/0609/F – Housing development consisting of 32 No. dwellings – lands adjacent to and including No. 47, 51 and 53 Lurgan Road, Moira – Granted 12/02/18

The existing housing land has not been fully built out, due to the oppressed building rates resulting from the economic recession of 2008. However, construction has re-commenced and there will be a need for further housing to be implemented at this location during the life of the Plan and taking account of the population growth witnessed.

**Draft Plan Strategy 2032 (Draft LDP)**

The Spatial Growth Strategy in the Draft LDP defines a settlement hierarchy and proposes housing growth allocations, which are predominantly focused on Lisburn City (West/Blaris). There is an identified future need for 10,500 new dwellings (700 per annum) by 2032, allowing a 10% margin for market flexibility.

Although the hierarchy approach is logical and consistent with the RDS, it is accepted in the Draft LDP that there is insufficient land zoned for housing development within existing settlement limits and the urban area to accommodate the level of growth.

The Draft Plan Strategy seeks to designate approximately 50 hectares of housing at West Lisburn/Blaris (WL 10) to facilitate the shortfall and also brownfield lands at Culcavy (WL11) outwith the SDL of Hillsborough. This takes no account of the need to distribute land evenly across the District. Moira is indicated to be a town in the settlement hierarchy, there is significant demand for housing along with higher order services.

The Draft Plan Strategy indicates that there is potential for 434 housing units on the remaining zoned land in Moira. It is noted that Towns make up 14% of the existing population or 15,484 people with Moira containing a population of 4,584 (Census 2011). Moira has witnessed considerable growth over the years with the previous Census population in 2001 of 3,669 and 2,407 in 1991. On this basis it is inevitable that additional lands are going to be required for housing. We feel that the council must carefully consider the over reliance on one major zoning to deliver the projecting housing need within the council area and it is on this basis that we consider our clients lands well placed to meet the projected housing needs.

The RDS 2035 indicates that within LCCC area the rural community living in small towns, villages and small settlements in the countryside, has experienced the fastest rate of population growth, which reverses a long-term trend of population decline.

In draft BMAP an objection was submitted for the inclusion of lands adjacent to settlement limit including the subject lands. The Planning Appeals Commission (PAC) commented in their Report that the overall size of the lands, which encompassed 22 hectares with a potential yield of 550 dwellings was too extensive for Moira's housing needs. However, they confirmed that development of the lands would have a limited effect on the landscape setting of Moira. It was not open for the PAC to reduce the extent of the area of the objection, as submitted, but they did recommend that the Department should include the area adjacent to the SDL to accommodate the Short Term Land Reserve (STLR). This recommendation was not taken forward by the Department in the unlawfully adopted version of BMAP.

STLR would be suitable at this location, as the subject lands have a strong defensible boundary and are contained by existing and proposed development on three sides. They would be read with the existing residential development, with little degree of separation and would represent a natural expansion of the existing settlement limit and development pattern, which would not cause urban sprawl. The necessary infrastructure is available and

there are good links to both the A1 and M1 providing easy access to central Lisburn, Belfast and further afield.

The subject lands are suitable for inclusion within the STLR, as they could be brought forward to deliver a limited number of units, which would assist with the localised and overall housing requirements of Moira taking account of the population growth.

If you wish to discuss this site-specific response, then please do not hesitate to contact me. Otherwise I look forward to future consultations as the LPD process progresses.

Yours sincerely

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**Planning Consultant**



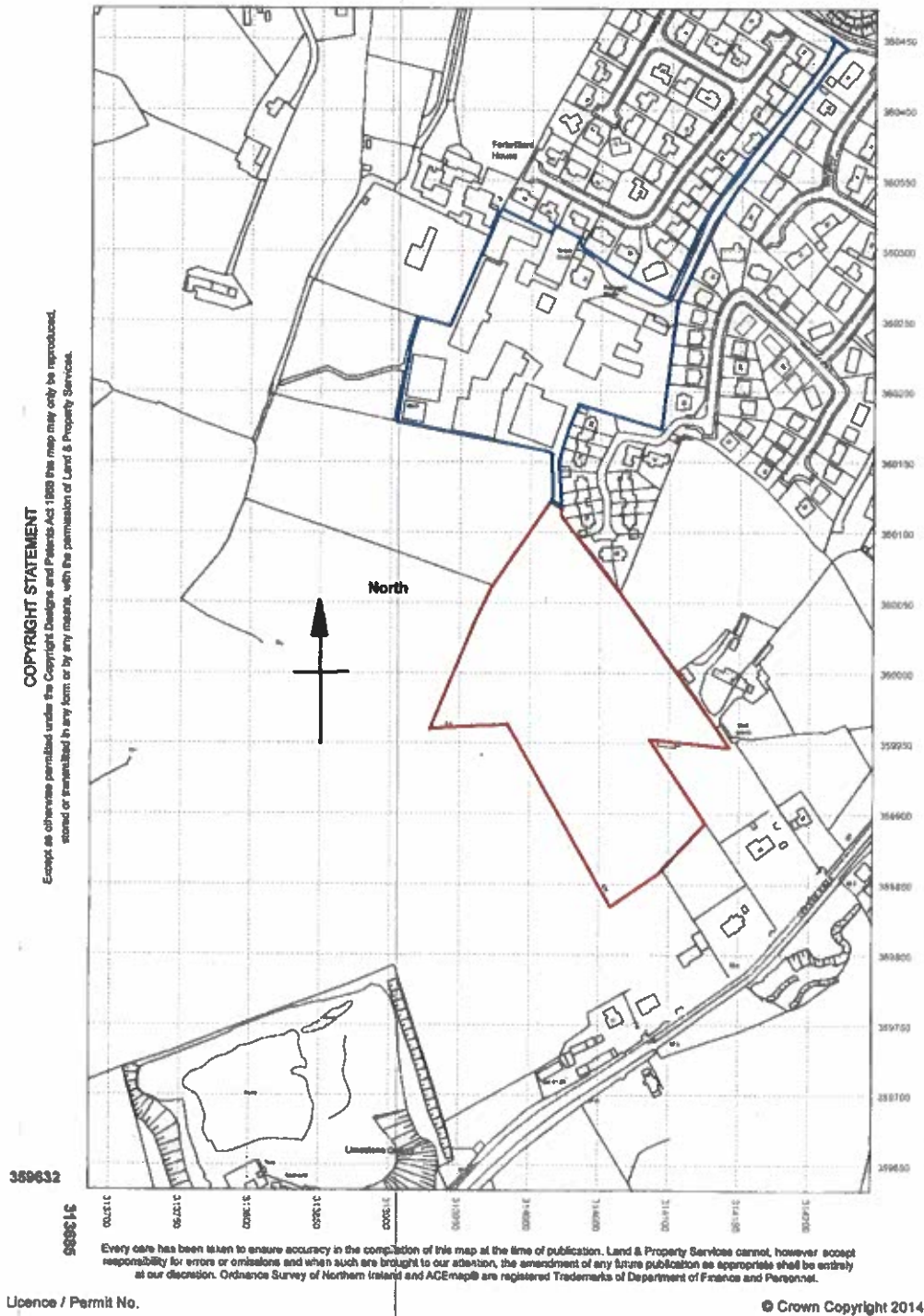
Appendix 1 - Belfast Metropolitan Area Plan 2015 (BMAP) - Map No. 5 Moira



## Appendix 2 - Map detailing site location

Site Location Plan

Scale 1/2500

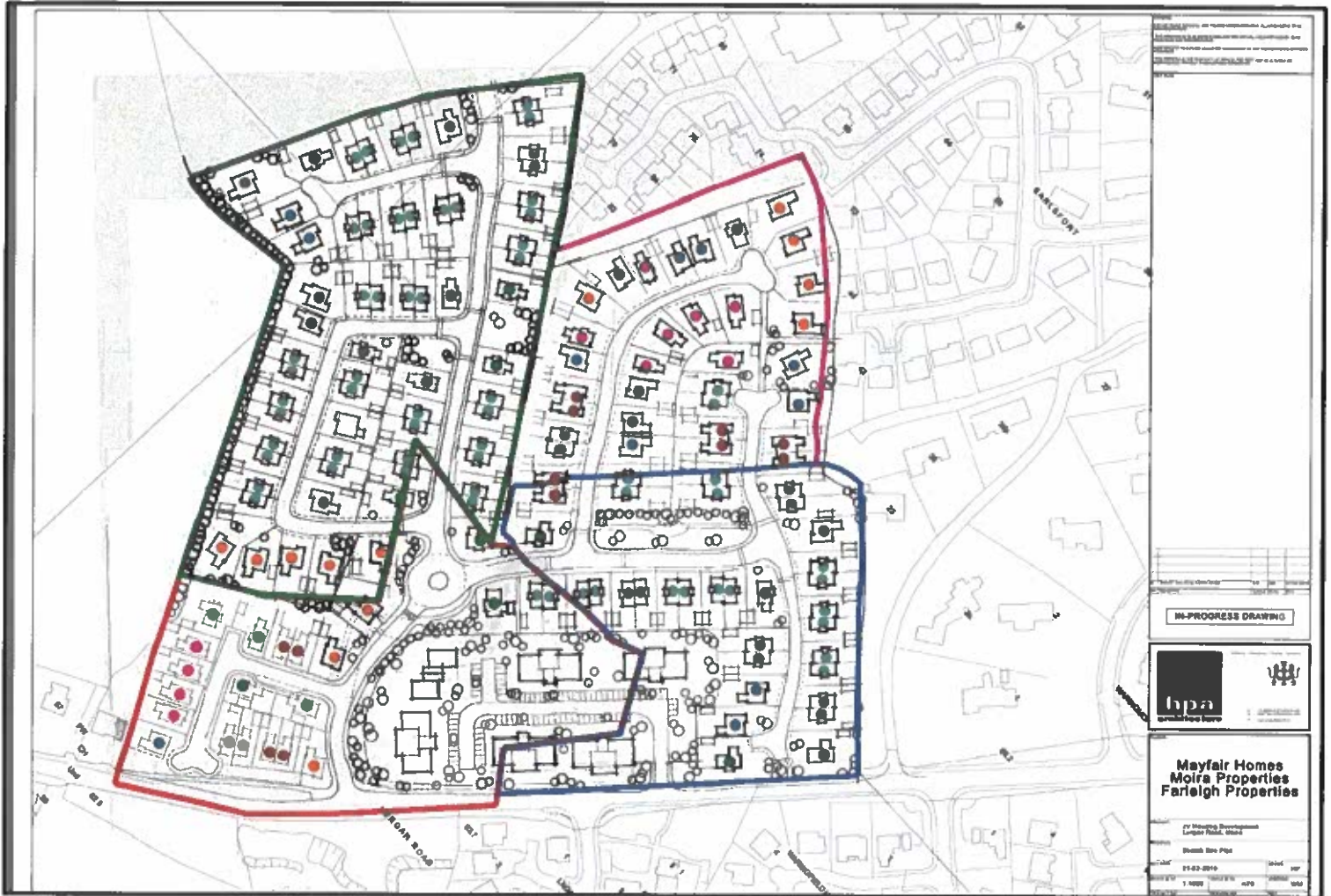




**Appendix 3 - Aerial of the subject lands in context with surrounded development on three sides**

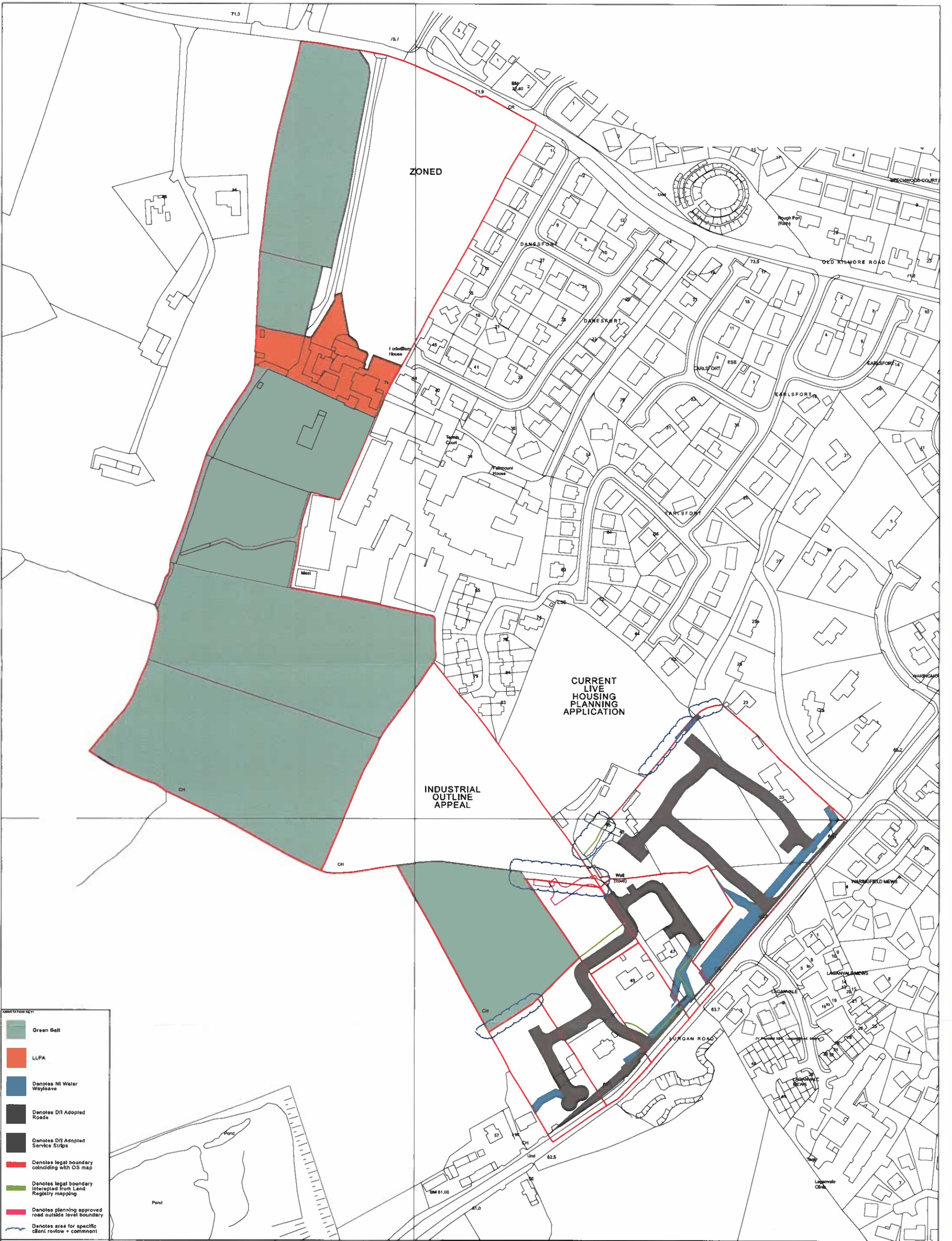


Appendix 4 - Drawings demonstrating possible housing masterplan scheme



Source – HPA Architects





- ABBREVIATION KEY:**
- Green Belt
  - LLPA
  - Denotes NI Water Wayleave
  - Denotes DfI Adopted Roads
  - Denotes DfI Adopted Service Strips
  - Denotes legal boundary coinciding with OS map
  - Denotes legal boundary interpreted from Land Registry mapping
  - Denotes planning approved road outside level boundary
  - Denotes area for specific client review + comment

**GENERAL:**  
 DO NOT SCALE DRAWING. USE DIMENSIONED DIMENSIONS ON V.A.I. DIMENSIONS TO BE VIEWED ON SET.  
 THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT DESIGN TEAM DRAWINGS AND SPECIFICATIONS.  
 CONTRACTOR TO BE INFORMED DIRECTLY AND IMMEDIATELY OF ANY DISCREPANCIES BY EMAIL OR PHONE.  
 THIS DRAWING IS THE PROPERTY OF HPA LTD. AND MUST NOT BE REPRODUCED OR REPRODUCED WITHOUT THEIR EXPRESS PERMISSION.

**KEY PLAN:**

**IN-PROGRESS DRAWING**

0	Page size changed to A1 and scale to 1:1250	WM	MB	08-02-2019
1	Updated to show Moira Properties Ltd	WM	WM	28-01-2019
2	Final	WM	WM	28-01-2019


**hpa**  
 architecture

**Mayfair Home (NI) Ltd**  
**Moira Properties Ltd**

<b>PROJECT:</b>	
DRAWING: Site context and boundary assessment	
REV DATE: 23-01-2019	DRAWN: WM
SCALE @ A1: 1:1250	CHECKED: WM
PROJECT NO: 19103	DRAWING NO: SD001
	REV: B



**Appendix 5 - Decision Notices of Adjacent Residential Development**



**APPROVAL OF PLANNING PERMISSION**  
**Planning Act (Northern Ireland) 2011**

Application No: **S/2014/0557/F**

Date of Application: **18th August 2014**

**Site of Proposed Development:** **Lands at and adjacent to 33 Lurgan Road Moira, BT67 0LX.**

**Description of Proposal:** **Demolition of existing dwellings and construction of housing development comprised of 20 detached dwellings, 12 semi-detached dwellings and garages, landscaping and associated site works.**

**Applicant:** Moira Properties Ltd  
**Address:**

**Agent:** McCreanor and Co Architects  
**Address:** 85 Plantation Road  
 Craigavon  
 BT83 5NN

**Drawing Ref:** S/2014/0557/F 01, 02D 03-20, Private Street Determination Drawing, Landscape Management Plan

The Council in pursuance of its powers under the above-mentioned Act hereby

**GRANTS PLANNING PERMISSION**

for the above-mentioned development in accordance with your application subject to compliance with the following conditions which are imposed for the reasons stated:

- The development hereby permitted shall be begun before the expiration of 5 years from the date of this permission.

**REASON:** As required by Section 61 of the Planning Act (Northern Ireland) 2011.

Application No. S/2014/0557/F LA05



**APPROVAL OF PLANNING PERMISSION**

Planning Act (Northern Ireland) 2011

Application No: LA05/2017/0572/F

Date of Application: 28th May 2017

Site of Proposed Development: 49 Lurgan Road  
Moira

Description of Proposal: Housing development of 8 no. dwellings in total, comprising 4 no. detached and 4 no. semi-detached dwellings, garages and associated road and site works

Applicant: Mayfair Homes (NI) Ltd  
Address: Jefferson House  
42 Queen Street  
Belfast  
BT1 6HL

Agent: Site Express  
Address: 11 Bridge Street  
Bangor  
BT20 5AW

Drawing Ref: LA05/2017/0572/F 01-16, Private Streets Determination.

The Council in pursuance of its powers under the above-mentioned Act hereby

**GRANTS PLANNING PERMISSION**

for the above-mentioned development in accordance with your application subject to compliance with the following conditions which are imposed for the reasons stated:

1. As required by section 61 of the Planning Act (Northern Ireland) 2011, the development hereby permitted shall be begun before the expiration of 5 years from the date of this permission.

REASON: Time limit

Application No. LA05/2017/0572/F

LA05



Appendix 6 – Previous representation 804 for housing in dBMAP 2015

804



Belfast Metropolitan Area Plan  
Andras House  
60 Great Victoria Street  
Belfast  
BT2 7BB

17 January 2005

Dear Sirs,

**BELFAST METROPOLITAN AREA PLAN 2015 – DRAFT PLAN  
OBJECTION ON BEHALF OF ADELA PROPERTIES, LANDS AT MOIRA,  
CO. DOWN**

We act for Adela Properties who have an interest in the land outlined in red on the attached map.

We have been instructed by Adela Properties to object to:

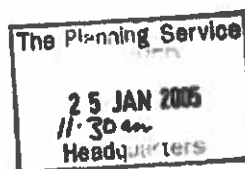
- The non-inclusion of these lands from the Settlement Development Limit of Moira shown on Map 5/004 in the Lisburn Map Booklet of Draft BMAP 2015.

The proposals to which this objection refers include Designation MA 01 (Settlement Development Limit, Moira) and Allocation HOU1 (Housing).

We reserve the right to be heard at the Public Inquiry which will no doubt be held in due course. We would of course welcome any opportunity to deal with the matter by discussion prior to the Inquiry if that were appropriate. If you feel that would be helpful, please do not hesitate to contact us.



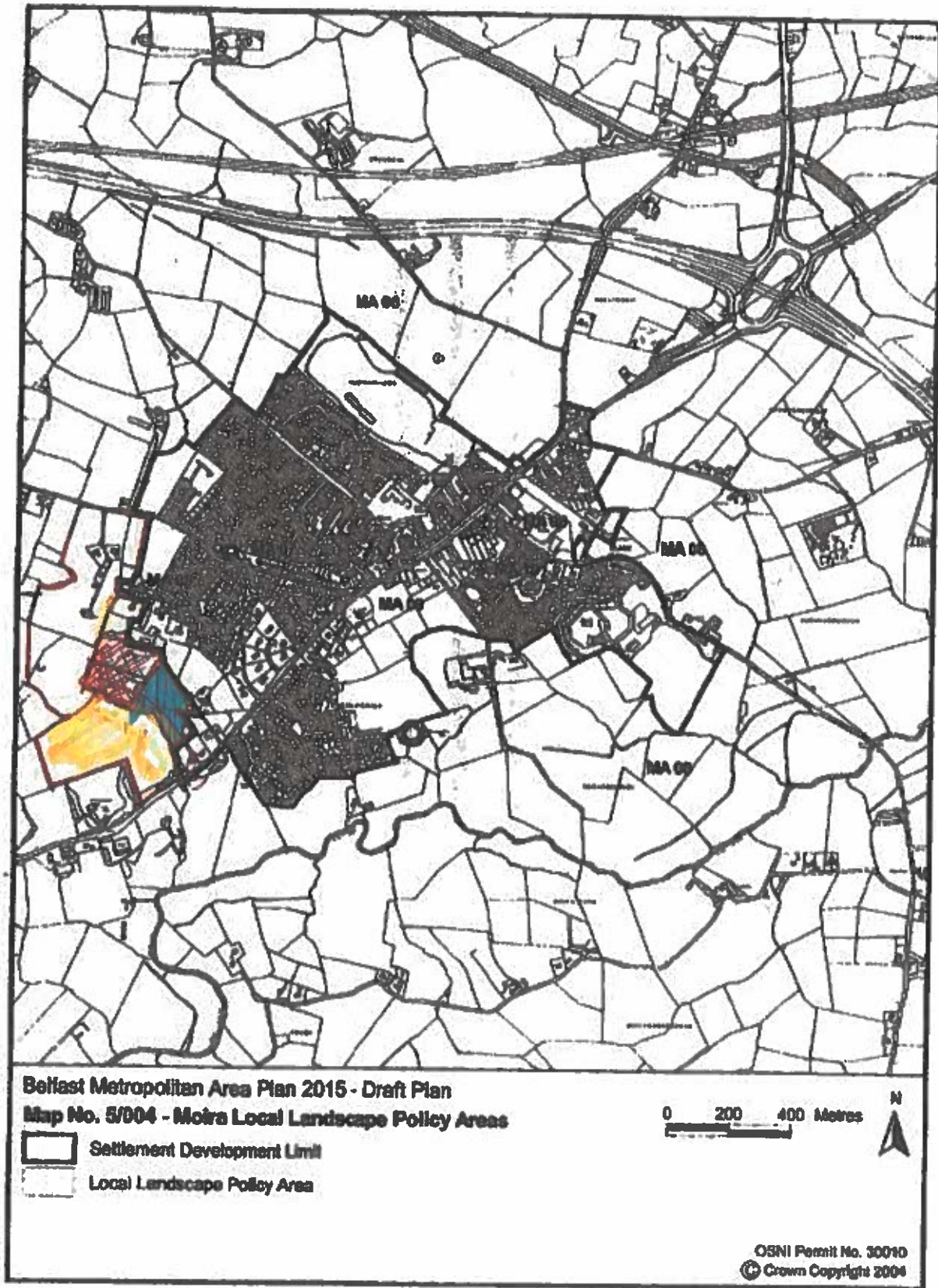
Strategic Planning



Victoria House, 1a Victoria Road, Holywood, BT18 9BA  
Tel: 028 9042 5222 • Fax: 028 9042 2888 • [info@strategicplanning.uk.com](mailto:info@strategicplanning.uk.com)

WT Reg. No. 839 4898 51





## Appendix 7 - PAC Report on subject lands for STLR for housing

Planning Appeals Commission

Article 7

### MOIRA

#### Objection to the settlement limit around Moira (objections 2471 & 3326)

One of the functions of the development plan is to provide for the growth of settlements commensurate with their position in the hierarchy and in accordance with the plan strategy based on the RDS. We consider that the designated settlement limit does allow for some future growth of the town in accordance with the plan strategy. There are several zoned sites that have not commenced development. We recommend that additional lands should be included to meet the needs of a longer period in line with our strategic conclusions in paragraph 3.2.75 of Part 1 of this report. We have addressed the strategic arguments related to the town's identification for significant expansion in the RDS in this paragraph. We cannot therefore support the objection in general terms, but must rather deal with the individual suggested sites. In any event the objections do not identify any sites for inclusion to meet the perceived shortfall and so would have achieved nothing.

The Department conceded objection site 207, comprising nearly 4 hectares with a yield of around 100 dwellings. However, this objection has been withdrawn. It does provide an indication of the Department's acceptance of peripheral sites to meet the housing land requirement. There is also a former factory premises at Meeting Street. We estimate the site area at around 2 hectares. This site has been cleared and could represent an urban capacity or windfall site.

We have endorsed the Department's recommended overall figure of 938 to meet the HGI, but found the Department's allowance for an additional 3-year supply to be too low. We considered that an additional 375 dwellings should be allocated to the STLR, which would allow for the significant expansion planned in the RDS. We must now consider which sites should be included in order to meet this figure.

#### Objections to the exclusion of lands from the settlement limit

##### Large site west of Moira (Objection 804)

This site is approximately 33 hectares in area. The large field at the southern end of the site is in Craigavon Borough and therefore it is not within the scope of this plan and cannot be considered. This reduces the site to around 22 hectares with a potential yield of around 550 dwellings. We consider that this is too extensive for Moira's housing needs and would represent urban sprawl. However this area is not subject to any environmental Designations and development would have a limited effect on the landscape setting of the town. It is not open to us to reduce the extent of the objection site as submitted. We consider that the Department could look to this area to accommodate the STLR, should the need arise. We shall return to this point later.

##### Land north of Backwood Road (objection 472)

The site consists of two fields in agricultural use. The southern boundary of the site abuts Moira Demesne Park and residential properties. There is also residential development on the other side of Backwood Road. The Department's reason for ruling out the site was that it is in LLPA MA06. There is no objection to the LLPA associated