

LISBURN AND CASTLEREAGH LOCAL DEVELOPMENT PLAN 2032

Draft Plan Strategy Representation

Strategic Policy 08 and 11

Carryduff

Rosemount Homes (Carryduff) Ltd.

January 2020

A Representation to Lisburn and Castlereagh City Council’s Draft Plan Strategy (Local Development Plan 2032)

<u>Contents</u>	<u>Page.</u>
1. Introduction	2
2. DPS Part 1 Strategic Policy 08 Housing in Settlements SHA Figure	4
2.1 Summary	4
2.2 Detailed Response	5
2.3 Changes to the Draft Plan Strategy	6
3. DPS Part 1 Strategic Policy 08 Housing in Settlements Housing Allocation	8
3.1 Summary	8
3.2 Detailed Response	10
3.3 Changes to the Draft Plan Strategy	22
4. DPS Part 1 Strategic Policy 11 Economic Development in Settlements	24
4.1 Summary	24
4.2 Detailed Response	24
4.3 Changes to the Draft Plan Strategy	25
5. Carryduff	27
6. Conclusions	29
<u>Tables</u>	
Table 1: Section 2 Summary of Relevant Soundness Tests	4
Table 2: Section 2 TSA Suggested Changes in Relation to Soundness Tests	7
Table 3: Section 3 Summary of Relevant Soundness Tests	8
Table 4: TSA Initial Allocations to Settlement Tiers	12
Table 5: TSA Allocations based on Spatial Growth Strategy	12
Table 6: TSA Base Allocations to Settlements	13
Table 7: TSA Settlement Appraisal Score Matrix	14
Table 8: TSA Adjusted Allocations Based on HEF	16
Table 9: Carryduff Survey on Sites Not Started	18
Table 10: Section 3 TSA Suggested Changes in Relation to Soundness Tests	22
Table 11: Section 4 Summary of Relevant Soundness Tests	24
Table 12: Section 4 TSA Suggested Changes in Relation to Soundness Tests	26
<u>Figures</u>	
TSA 1: Table 3 of DPS Part 1 (Strategic Housing Allocation)	8
TSA 2: Site Location Plan	27

1. Introduction

1.1 This representation has been prepared by **TSA Planning** on behalf of our client **Rosemount Homes (Carryduff) Ltd.** in respect of Lisburn and Castlereagh City Council's published Draft Plan Strategy (DPS), for their Local Development Plan 2032.

1.2 Rosemount Homes are a diverse family owned private house builder with a wealth of experience in the local house building industry. They are currently constructing a development of 108 no. new family homes at 'Black Quarter Meadow', Carryduff and have other land interests within the Town.

1.3 This paper assesses Strategic Policies 08 and 11 within the Draft Plan Strategy including the associated amplification text which we believe is **unsound** in its current form.

1.4 To inform this response to the Draft Plan Strategy, consideration is given to the legislative requirements relating to the preparation, form and content of the Local Development Plan set out in the Planning Act (NI) 2011 and The Planning (Local Development Plan) Regulations (NI) 2015. Consideration is also given to the following Policy and Guidance publications, along with the wider content of the Draft Plan Strategy (including accompanying assessments and technical supplements):

- The Regional Development Strategy (RDS) 2035;
- The Strategic Planning Policy Statement (SPPS);
- The Department's Development Plan Practice Notes (DPPN); and in particular:
 - DPPN 6 - Soundness; and
 - DPPN 7 - The Plan Strategy.
- LDP Technical Supplement 1: Housing Growth Study;
- LDP Technical Supplement 2: Urban Capacity Study;
- LDP Technical Supplement 3: Employment Land Review; and
- LDP Settlement Appraisals (Appendices 2 of LDP Technical Supplement 6: Countryside Assessment)

Regard is also had for the Preferred Options Paper stage, the LDP Timetable, and the Council's Community Plan 2017/2032.

1.5 **Section 2** of the paper analyses Strategic Policy 08 in respect of Housing in Settlements, including the Council's Housing Growth figure, and all associated text, setting out why we currently believe these to be unsound; and sets out the appropriate evidence and changes required to ensure the DPS is sound.

1.6 **Section 3** relates to the Council's Strategic Housing Allocations identified within Table 3 of the DPS.

- 1.7 **Section 4** assesses the Council's Strategic Policy 11 – Economic Development in Settlements in respect of the Council's strategy to bring forward all undeveloped economic lands from existing development plans.
- 1.8 **Section 5** identifies and assesses potential housing lands within Carryduff.
- 1.9 **Section 6** sets out our Conclusions in respect of this representation.
- 1.10 We respectfully request this representation is heard by **oral hearing** at Independent Examination stage.

2. **DPS Part 1: Strategic Policy 08 Housing in Settlements – Strategic Housing Allocation Figure**

2.1 Summary

- 2.1.1 Within Strategic Policy 08 the Council have set out a Strategic Housing Allocation figure of 11,550 new dwellings over the Plan period, plus an additional c.1,500 dwellings at the strategic mixed-use site at West Lisburn/Blaris. The figure of 11,550 dwellings is currently unsound, particularly as it places inappropriate onus on past population trends as identified at **Table 1** and our detailed summary below.

Table 1: Summary of Relevant Soundness Tests

<i>Soundness Test C1 – Did the Council take account of the RDS</i>
<p>The Council have commissioned their own HGI figure prepared by Lichfields, which is based on 2016 household projections. However, as per the HGI figures published by the Department, these are based on recent trends and assume that these trends will continue into the future. The figure projected by Lichfields is stated as being irrespective of the direction of future policies and strategic aspirations. As such, the HGI figure identified by Lichfields, should be used in the same way as the published HGIs. To this end, the RDS identifies at RG8 that the HGI figures should not be seen as a rigid framework but guidelines for local planning.</p>
<i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i>
<p>Paragraph 6.136 of the SPPS states that the policy approach in respect of housing in settlements must be to facilitate an adequate and available supply of quality housing to meet the needs of everyone. The Council's Strategic Housing Allocation figure is currently too stringent as it solely focuses on past population trends and is therefore likely to result in an inadequate provision of housing lands over the Plan period.</p> <p>Furthermore, in correspondence relating to the recently published revised HGI figures (September 2019), the Department have indicated that other local evidence should be considered in determining the amount of housing land required, which has not been undertaken by LCCC.</p>
<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i>

The Strategic Allocation figure is currently too restrictive and as such is inappropriate. All forms of local evidence have not been considered by the Council.

Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances

Although the Council have increased their original Strategic Housing Allocation figure by 10% to 11,550 dwellings, in order to allow for the non-delivery of some housing sites, flexibility has not been afforded in respect of changing social or economic circumstances in the future which may impact upon housing demand and delivery.

2.2 Detailed Response

Department for Infrastructure 2016 based Housing Growth Indicators

2.2.1 In September 2019, the Department for Infrastructure (DfI) published revised, 2016 based, Housing Growth Indicators for each of the 11 Council Areas. In respect of Lisburn and Castlereagh, this figure is 713 dwellings per annum, a reduction from 739 dwellings per annum previously published in 2016. Despite this reduction, the Council's housing growth figure of 700 dwellings per annum represents a further reduction than both figures identified by the Department. This indicates that the figure used by the Council could result in an under provision of housing lands over the Plan period.

2.2.2 In correspondence to Heads of Planning (Councils), DfI stated that the identified HGI's assume that recent trends will continue into the future and do not attempt to model existing policy or societal factors. Furthermore, the figures do not predict the impact of future policies, changing economic circumstances or other future events which may impact housing requirements. As such, the Department advise that other relevant local evidence should be considered and LDPs must aim to make provision for an appropriate housing requirement following analysis of all relevant sources of evidence. This includes evidence in respect of recent build rates, which for Lisburn and Castlereagh, DfI state as being 772 dwellings per annum (2015-18) within the revised HGI document published in September 2019.

Housing Growth Study

2.2.3 Within the Council's evidence, Lichfields have caveated that their projections are calculated irrespective of future policies and strategic aspirations. The figure they identify is based on 2016 household projections and the study acknowledges that the Department are currently calculating their own 2016 based figures, which were not available at the time of writing. As

identified above, these figures have since been published and are higher than those projected by Lichfields.

2.2.4 We acknowledge that Lichfields have compared their projections to historic build rates from 2005-2017, which average at 618 dwelling per annum. However, this average covers a time period of deep economic recession and a depressed residential market. As such, more recent build rates of 772 dpa (2015-18) which still fall significantly below that of 2005/06/07, are appropriate for consideration.

2.2.5 Finally, Para. 6.29 of the Lichfields Housing Growth Study states "...the fact that the HGI figure of 692 dpa is broadly aligned with past trends indicates that this level of growth is entirely achievable over the forthcoming Plan period". However, Para. 4.15 also identifies that falling completions have resulted in a shortfall in housing delivery against the estimated future need. This has served to create a situation of undersupply, which has exacerbated market pressure. This has led to high house prices and an increased reliance on the private rented sector. We can therefore conclude from this evidence that a housing growth figure which is aligned too closely with past trends has the potential to further negatively impact upon affordability across the Council area. This is supported by Lichfields, who state at Para. 4.16 of their Housing Growth Study "The evidence of market pressure in Lisburn & Castlereagh implies there is a need for more housing and there is evidence that basing the future requirement solely on the official projections may not be sufficient to deal with the housing challenge that exists in Lisburn & Castlereagh". Despite this evidence presented by Lichfields, the Council have solely based their Strategic Housing Allocation on the projections advised by Lichfields, with a minimal 10% increase to counteract non-delivery. This approach is not appropriate or reasonably flexible as it does not account for changes in societal or economic circumstances.

2.2.6 Taking account of the above, the Council's identified Strategic Housing Allocation of 11,550 dwellings is too low when considering what is appropriate in respect of the most up to date evidence base. Therefore, we have calculated an updated Strategic Housing Allocation taking an average of the recently published HGI figure (713 dwellings per annum) and recent build rates (772 dwellings per annum). This equates to a figure of 743 dwellings per annum and a total figure of 11,145 dwellings when projected over the Plan period (2017-2032). Similar to the Council's approach, this has then been increased by 10% to 12,260 dwellings (2017-2032) to allow for non-delivery of sites.

2.3 Changes to the Draft Plan Strategy

2.3.1 Based upon the above commentary, we respectfully suggest the following amendments are made to ensure the Plan Strategy is Sound, as detailed in **Table 2**.

- *Amendment 1:* Amend the Strategic Housing Allocation figure at Page 58 of DPS Part 1 from 11,550 dwellings to 12,260 dwellings

Table 2: TSA suggested changes in relation to tests of soundness

<p><i>Soundness Test C1 – Did the Council take account of the RDS</i></p> <p><i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i></p>
<p>In line with guidance set out in Policy RG8 of the RDS, the SPPS and the Department, the above amendment has used the recently published HGI figure as a starting point for determining the level of housing growth across the Council area and has also incorporated local evidence in the form of recent build rates to determine the final growth figure.</p>
<p><i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i></p>
<p>The amendment considers the relevant evidence available and provides a realistic and appropriate growth figure.</p>
<p><i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i></p>
<p>The uplifted Strategic Housing Allocation provides appropriate flexibility in respect of changing social/economic circumstances as well as a 10% increase to allow for the non-delivery of sites.</p>

3. DPS Part 1: Strategic Policy 08 Housing in Settlements – Allocation to Settlements

3.1 Summary

3.1.1 Table 3 of the DPS sets out the Council’s Strategic Housing Allocation between settlements over the Plan Period (**TSA 1**).

TSA 1: Council’s Strategic Housing Allocation over Plan Period

Settlement	Potential Units Remaining	Potential Units on Urban Capacity Sites	Windfall Potential 1-4 Units Projected over 12 year period	Windfall Potential 5+ Units Projected over 12 year period	Total Potential
Lisburn City	4,079 (38.8%)	607 (5.8%)	97 (1%)	420 (4%)	5,203 (49.6%)
Lisburn Greater Urban Area	188 (1.8%)	0	2 (0.01%)	216 (2%)	406 (3.8%)
Castlereagh Greater Urban Area	1,628 (15.5%)	103 (1%)	43 (0.4%)	248 (2.4%)	2,022 (19.3%)
Carryduff	1,407 (13.4%)	119 (1.1%)	10 (0.09%)	76 (0.8%)	1,612 (15.4%)
Hillsborough & Culcavy	421 (4%)	25 (0.2%)	22 (0.2%)	44 (0.4%)	512 (4.9%)
Molra	545 (5.2%)	21 (0.2%)	0	151 (1.4%)	717 (6.8%)
Urban Settlement Total	8,268 (78.7%)				10,472 (99.8%)
Villages & Small Settlements	1,231 (11.7%)				1,231 (11.7%)
Countryside	729 (6.9%)				729 (6.9%)
Total Units	10,228 (97.4%)	875 (8.3%)	174 (1.7%)	1,155 (11%)	12,432 (118.4%)
Strategic Mixed Use site West Lisburn/Biaris	1,350 (12.9%)				1,350 (14.2%)
Total no of units	11,578	12,453	12,627	13,782	13,782
Total % of HG	110.3%	118.6%	120.3%	131.3%	131.3%

3.1.2 The allocation of housing between settlements, as shown above, is fundamentally flawed and as such is unsound, as it does not set out a clear strategy for the distribution and allocation of housing between settlement tiers, informed by the settlement hierarchy, function and the evidence base. This is discussed further at **Table 3** and our detailed response below.

Table 3: Summary of Relevant Soundness Tests

<i>Soundness Test C1 – Did the Council take account of the RDS</i>
Policy RG8 of the RDS 2035 requires the management of housing growth to achieve sustainable patterns of residential development, this includes ensuring an adequate and available supply of quality housing to meet the needs of everyone and the use of a broad evaluation framework to assist judgements on the allocation of housing growth. Whilst the Council have identified an allocation within Table 3 of the DPS (TSA 1) and have carried out

an evaluation framework of settlements, these have not informed an overall strategic allocation to settlements.

Furthermore, the RDS states that an important step in the 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 smaller settlements and the countryside. In their allocations, the Council have not assessed or judged the strategic growth of individual settlements or the most sustainable locations for housing.

Soundness Test C3 – Did the council take account of policy and guidance issued by the Department

As per the RDS, the SPPS (Para. 6.135) identifies that the regional strategic objectives for housing in settlements include managing housing growth to achieve sustainable patterns of development. The Council's strategic allocation of housing to settlements is not managed and does not direct housing to the most sustainable locations, outside of Lisburn City.

Furthermore, the SPPS states at Para. 6.142 that Local Development Plans are to set out the overall housing provision for each settlement over the plan period. Whilst this appears to be included in Table 3 of the DPS, this only sets out the potential units remaining, whether this is through existing zonings, live permissions, urban capacity units or windfall sites. The Council have not identified the overall strategic housing allocation for settlements based on the evidence provided.

Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow

The Council have not set out a strategic allocation of housing across settlements or a coherent strategy for the zoning of lands at the Local Plan Policies Stage.

The allocations set out in Table 3 of the DPS are not consistent with the Objectives of the Plan which are to support Towns, Villages and Small Settlements as vibrant and attractive centres providing homes and services appropriate to their role in the settlement hierarchy whilst protecting their identity from excessive development. There has been no assessment of the role of individual settlements or settlement tiers in respect of the strategic allocations set out in Table 3 of the DPS, which appear to be solely based upon existing commitments particularly within Villages and Small Settlements. As such, solely allocating housing based upon the existing split of commitments does not achieve the Council's strategic objectives.

Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

The allocations set out in Table 3 of the DPS are not appropriate as they do not strategically manage housing between settlements, taking into account the available evidence, particularly the Housing Growth Study and Settlement Appraisals. The Housing Growth Study, carried out by Lichfields, states that they have not carried out an assessment in respect of the distribution of future housing lands and the report does not provide a policy position in respect of future levels of housing provision, which is a matter for future determination by LCCC. This does not appear to have been carried out by LCCC.

Furthermore, the evidence base which identifies existing commitments (Housing Monitor 2016-2017) is inaccurate and as such the allocations provided are unrealistic.

Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances

As the allocation between settlements does not take into account the current strategic direction of the Council, it cannot be reasonably flexible to deal with changing circumstances over the Plan period.

3.2 Detailed Response

- 3.2.1 There appears to be a wealth of evidence provided by the Council in respect of housing growth. However, this has not informed the strategic allocations set out within Table 3 of the DPS. The housing allocations within Table 3 appear to be based on existing commitments and urban capacity sites in larger settlements, with no acknowledgement or assessment as to whether these figures are sustainable or appropriate over the Plan period. Furthermore, there is no strategy for the zoning of housing lands, apart from evidently zoning existing commitments and retaining existing zonings which are not committed. Strategic housing allocations should allow for the management of housing in the most sustainable, appropriate and realistic locations and these allocations should then be assessed against existing commitments (taking 10% off existing commitments at this stage to allow for flexibility in respect of deliverability). If a settlement has excess committed housing lands (compared to its strategic allocation) these could then be phased appropriately based on the likelihood of deliverability. This approach is in line with the provisions set out in Para. 6.142 of the SPPS which states Local Development Plans should provide for a managed release of housing land, in line with a 'plan, monitor and manage' approach.

3.2.2 Solely basing housing allocations on existing commitments, prior to a full assessment of the deliverability of lands and without provisions to zone additional lands, could result in significant inconsistencies between the Draft Plan Strategy and Local Policies Plan.

Evidence - Housing Growth Study (Lichfields)

3.2.3 As previously identified, the Council instructed an independent Housing Growth Study carried out by Lichfields. Whilst the Council relied on this study to determine their overall strategic housing allocation, there are a number of issues identified within the study which have not been considered by the Council when allocating housing to settlements.

3.2.4 Paragraph 9.11 of the Housing Growth Study states:

"No assessment has been undertaken in this study in respect of the distribution of future housing land and its alignment with the Local Plan Strategy ... It will be for LCCC to consider the spatial strategy of the Local Development Plan ... It is important that the future housing needs of all settlements are addressed through the emerging Local Development Plan."

3.2.5 The Draft Plan Strategy states at Page 58, the allocation of housing growth across the Council area has been informed by eight indicators provided in the SPPS. We will now assess these eight indicators in turn in respect of how they have influenced the housing allocation stated at Table 3 of the DPS.

RDS Housing Growth Indicators

3.2.6 As identified in **Section 2** of this representation, the Council have commissioned a study to update the 2012 based HGI's through the use of 2016 based household projections data, together with adjustments set out within the 2012 based HGI methodology. This resulted in a rounded up figure of 700 dwellings per annum equating to 10,500 dwellings for the plan period. A buffer of 10% over supply has been applied to the HGI baseline figure to give a strategic housing allocation figure of 11,550. This figure should be strategically allocated between settlements in line with the Council's Spatial Growth Strategy. This has not been carried out by the Council and as such the DPS is unsound.

3.2.7 Therefore, **Table 4** below sets out an initial split of our revised Strategic Housing Allocation figure (12,260) between settlement tiers based on the existing percentage split of households. We have allowed for 729 dwellings in the countryside as per Table 3 of the DPS, resulting in a remaining 11,531 dwellings to be allocated between settlements.

Table 4: TSA Initial Allocations to Settlement Tiers

Settlement Tier	Current No. Households	% Of All Households within Settlements	Allocation
Lisburn	18,415	41%	4728
Lisburn Greater Urban Area	1979*	4%	461
Castlereagh Greater Urban Area	12,287*	27%	3113
GUA Total	14,266	31%	3574
Towns	6040	13%	1500
Villages	4965	11%	1268
Small Settlements	1630**	4%	461
Settlement Total	45,316	100%	11,531

* Estimate based on an average household size of 2.5 persons

** Estimate based on Settlement Appraisal

3.2.8 We have then adjusted the above figures to take into account the settlement hierarchy and growth strategy. This has focussed on the percentage split between Towns, Villages and Small Settlements to focus more growth within the Towns and Villages as these settlements have a higher level of services, community facilities and public transport provision compared to Small Settlements. Whilst we appreciate growth should be focussed within Lisburn City, the percentage allocation has remained the same, as increased growth will be facilitated by the Strategic Mixed Use designation at West Lisburn/Blaris (additional 1,500 dwellings). The amended allocations are detailed at **Table 5** below.

Table 5: TSA Allocations based on Spatial Growth Strategy

Settlement Tier	% Of All Households within Settlements	Adjusted % to Support Growth Strategy	Amended Allocation
Lisburn	41%	41%	4728
Lisburn Greater Urban Area	4%	4%	461
Castlereagh Greater Urban Area	27%	27%	3113
GUA Total	31%	31%	3574
Towns	13%	14%	1614
Villages	11%	12%	1384
Small Settlements	4%	2%	231
Total	100%	100%	11,531

* Estimate based on an average household size of 2.5 persons

** Estimate based on Settlement Appraisal

3.2.9 Using the above settlement tier allocations, these have been split between settlements in respect of their current percentage share of households as shown at **Table 6** below.

Table 6: TSA Base Allocations to Settlements

Settlement	Allocation
City	
Lisburn	4728
City Total	4728
Greater Urban Areas	
Lisburn GUA	461
Castlereagh GUA	3113
GUA Total	3574
Towns	
Carryduff	695
Hillsborough and Culcavy	468
Moira	451
Towns Total	1614
Villages	
Ahgalee	84
Annahilt	103
Dromara	111
Drumbeg	90
Drumbo	44
Glenavy	167
Lower Ballinderry	92
Maghaberry	245
Milltown	159
Moneyreagh	144
Ravernet	59
Stoneyford	59
Upper Ballinderry	27
Villages Total	1384
Small Settlements	231
Settlements Total	11,531

Use of the RDS housing evaluation framework

3.2.10 The Council have carried out a housing evaluation framework within their Settlement Appraisal (Technical Supplement 6). Whilst the Council state this has assisted in informing the proposed settlement hierarchy, the assessment does not appear to have been used in the process of allocating housing to settlements as suggested within the RDS. There has been no adjustment to allocations based upon the results of each HEF test. This has the potential for housing growth to be directed towards unsuitable and unsustainable locations. For example, within Technical Supplement 1, Table 11 indicates there is a remaining potential for 80 no. dwellings within Stoneyford, a Village of 213 no. households and which scored 'Low' within the resource and community services tests of the Settlement Appraisals. This can be compared to the Village of Maghaberry which appears to have been allocated a lower level of growth (70 no. dwellings) based on its remaining potential. However, Maghaberry comprises 886 households and scored 'Medium' on both the resource and community services tests, demonstrating that it is a more sustainable location for housing growth. This is not the only example of imbalance within the DPS housing allocations but seeks to illustrate how it is wholly inappropriate to allocate housing based on existing commitments without considering the role of individual settlements.

3.2.11 We have therefore endeavoured to score settlements based on the Settlement Appraisal (TS6) using the below scoring system (except for development constraints whereby Low scores +5 and High scores -5):

- Low -5%
- Medium 0
- High +5%

For the purposes of this exercise, all tests are proportioned the same score, however, the Council may find it prudent to apportion certain tests greater weight. The results are shown at **Table 7** below. Please note, Lisburn Greater Urban Area and Castlereagh Greater Urban Area are not included within the table as these settlements were not assessed within the Settlement Appraisal.

Table 7: Settlement Appraisal Score Matrix

Settlement	Res.	Env. Cap.	Trans.	Econ. Dev.	Char.	Comm. Serv.	Soc.	Dev. Con.	Score
City									
Lisburn	H	H	M	H	H	H	M	H	-
Towns									
Carryduff	M	H	M	M	H	M	M	H	5
Hillsborough	H	H	M	M	H	H	M	M	20
Moira	H	H	M	M	H	M	M	H	10

Table 7 Continued									
Settlement	Res.	Env. Cap.	Trans.	Econ. Dev.	Char.	Comm. Serv.	Soc.	Dev. Con.	Score
Villages									
Aghalee	M	M	M	L	H	M	L	M	-5
Annahilt	L	M	M	L	H	L	M	M	-10
Dromara	M	H	M	L	M	M	M	M	0
Drumbeg	L	H	M	L	M	L	M	M	-10
Drumbo	L	H	L	L	H	M	L	M	-10
Glenavy	H	L	M	M	M	H	M	M	5
Lower Ballinderry	L	H	M	M	H	M	M	H	0
Maghaberry	M	M	M	M	H	M	L	M	0
Milltown	L	H	M	L	H	M	M	H	-5
Moneyreagh	M	H	M	M	H	M	M	H	5
Ravernet	L	H	M	M	H	L	L	H	-10
Stoneyford	L	H	M	M	H	L	M	H	-5
Upper Ballinderry	L	H	M	M	H	L	M	H	-5
Small Settlements									
Ballyaughlis	L	H	L	L	M	L	M	M	-15
Ballycarn	L	H	L	L	M	L	L	H	-25
Ballyknockan	L	H	M	M	H	L	M	H	-5
Ballylesson	L	H	L	M	H	M	M	M	0
Ballynadolly	L	M	M	L	M	L	L	M	-20
Ballyskeagh	L	H	M	M	H	L	M	H	-5
Boardmills	L	M	L	L	L	M	M	M	-20
Carr	L	L	L	L	M	M	M	M	-20
Crossnacreevy	L	H	M	M	H	L	M	H	-5
Drumlough	L	H	M	L	M	L	M	M	-10
Drumlough Road	L	M	L	L	M	L	M	M	-20
Dundrod	L	M	L	L	M	M	M	M	-15
Duneight	L	M	M	L	H	L	L	H	-20
Feumore	L	H	M	M	H	L	M	H	-5
Halfpenny Gate	L	M	L	L	H	L	M	M	-15
Halftown	L	M	M	L	M	M	M	M	-10
Hillhall	M	H	L	M	M	M	L	H	-10
Kesh Bridge	L	L	M	M	M	H	M	M	-15
Lambeg	L	H	M	M	H	L	M	H	-5
Legacurry	L	H	M	M	H	M	L	H	-5
Long Kesh	L	H	M	M	H	M	M	H	0
Lower Broomhedge	L	H	M	M	H	L	L	H	-10
Lurganure	L	H	M	L	H	L	M	H	-15
Lurganville	L	M	L	L	M	L	L	M	-25
Lurgill	L	H	M	M	H	L	M	H	-5
Magheraconluce	L	M	L	L	M	L	L	M	-25
Morningside	L	L	M	L	H	L	L	M	-20
Purdysburn	L	H	L	M	H	L	L	H	-15
Ryan Park	L	H	M	M	H	L	M	H	-5

Settlement	Res.	Env. Cap.	Trans.	Econ. Dev.	Char.	Comm. Serv.	Soc.	Dev. Con.	Score
St. James	L	M	L	L	M	M	L	M	-20
The Temple	L	H	M	M	H	L	M	H	-5
Tullynacross	L	H	L	L	M	L	M	H	-20
Upper Broomhedge	L	M	L	M	H	L	L	H	-20

3.2.12 Using the above percentage scores, the base allocations (**Table 6** above) were increased or decreased accordingly. These results were then adjusted to ensure the overall allocations to each settlement tier remain the same as shown in **Table 8** below. A full table of calculations is included at **Annex 1** for reference. The allocation for Lisburn has remained as 4,728 dwellings as it is the only settlement within the City tier. Allocations to greater urban areas also remain the same as these were not assessed in the settlement appraisal.

Table 8: Adjusted Allocations based on HEF

Settlement	Base Allocation	Adjusted HEF Allocation Rounded
City		
Lisburn	4728	4728
City Total	4728	4728
Greater Urban Areas		
Lisburn GUA	461	461
Castlereagh GUA	3113	3113
GUA Total	3574	3574
Towns		
Carryduff	695	659
Hillsborough and Culcavy	468	507
Moira	451	448
Towns Total	1614	1614
Villages		
Ahgalee	84	81
Annahilt	103	95
Dromara	111	114
Drumbeg	90	82
Drumbo	44	40
Glenavy	166	178

Table 8 Continued		
Settlement	Base Allocation	Adjusted HEF Allocation Rounded
Lower Ballinderry	91	94
Maghaberry	247	253
Milltown	159	155
Moneyreagh	144	154
Ravernet	59	54
Stoneyford	59	58
Upper Ballinderry	27	26
Villages Total	1384	1384
Small Settlements	231	231
Settlements Total	11,531	11,531

3.2.13 The above figures are indicative at the stage, taking consideration of the Settlement Appraisals prepared by the Council. However, we wish to identify our concerns with the consistency of the Settlement Appraisal evidence. For certain tests, particularly the environmental capacity test, is it unclear whether a low score is positive or negative and vice versa, as this appears to alternate between settlements.

3.2.14 Therefore, the Settlement Appraisal should be reviewed and amended accordingly to ensure consistency. The Council should then use the accurate evidence to adjust figures within the above Table as necessary. Additional weight may be given to certain tests, for example the resource and economic development test, as these would permit increased residential growth in the most sustainable locations.

Allowance for existing commitments

3.2.15 The Council have assessed existing commitments based on the latest housing monitor information. The Council state that monitored sites consist of existing housing zonings and committed sites with planning permission. The latest housing monitor is based at March 2017 and this appears to have formed the main foundation of housing allocations across all settlements.

3.2.16 As stated above, basing housing allocations solely on existing commitments without consideration of whether these allocations are sustainable, realistic or appropriate is unsound in relation to a number of soundness tests. Housing allocations to settlements should be formed

from the overall strategic growth figure and these should then be compared to existing commitments to inform whether there is sufficient lands within settlements to meet their allocations.

3.2.17 We have significant concerns relating to the accuracy of the 2017 Housing Monitor Statistics. From a desktop study of selected settlements, it would appear that a number of monitored sites with “live” planning permission have now expired or planning applications have been submitted and approved to alter potential yields. For example, **Table 9** below identifies changes in the Housing Monitor Statistics (on sites not started) from those stated within the Draft Plan Strategy in respect of Carryduff. As shown within the Table, the actual remaining potential yield on sites not started is significantly lower than the 1,057 no. dwellings identified within the 2017 Housing Monitor Statistics. Furthermore, the remaining yield figure is reduced by more than the 10% which was permitted in the DPS to counteract deliverability issues. This indicates that more than 10% of housing sites in settlements could be undeliverable.

Table 9: Carryduff Survey Sites Not Started

Site Ref	Site Name	Remaining Potential	Adjusted Potential	Comment
591	Adjacent to 22 Lough Moss Park - CF 04/01	14	-14	U/2007/0401/RM - Approved 24.11.08 (Expired 24.11.13)
11437	Land southeast of Meadowvale Rd - CF 04/04	174	-63	LA05/2019/0354/PAN - 111no. Dwellings
11981	Rear of 21 Hollygate Avenue - CF 09/TS	1	-1	Y/1999/0243 - Expired
11988	26 Ballynahinch Rd - CF 06/TS	2	-2	Y/2000/0256/O - Expired & Y/2003/0431/O - Refused
12152	32-34 Ballynahinch RD - CF 08/TS	3	-3	Y/2000/0004/O - Expired & Y/2003/0432/O - Refused
12262	Sunnyholme 11 Queensfort Rd	3	-3	Y/2002/0017/RM - Approved 30.01.03 (Expired 30.01.08)
12323	Between 7 & 9 Thorndale Rd South	1	-1	Y/2014/0047/F - Expired 06.06.19
12591	20 Church Road	1	-1	Y/2001/0219/O - Expired
12977	N of Mariborough Cres, W of Saintfield Rd - CF 03/05	349	-349	Y/2013/0271/O + Y/2013/0216/O - Appeals Dismissed
13233	101 Ballynahinch Rd CF 04/03	110	-10	LA05/2015/0709/F - 108no. Under Construction. Includes 21523 (for 8no.)
18244	Adjacent to 694 Saintfield Rd - CF03/02	30	-30	LA05/2018/0894/F - Convenience Store Approved 19.9.19
18531	N of Thorndale Park - CF 04/02	24	-24	No Planning Permission
18827	31 Church Road	3	-3	Y/2007/0537/RM - Expired

Table 9 Continued				
Site Ref	Site Name	Remaining Potential	Adjusted Potential	Comment
19657	16 Hillsborough Road	3	-3	Y/2007/0294/F - Expired
20077	70-72 Ballynahinch Rd	33	-33	Y/2007/0528/F - Expired & Y/2013/0215/F – Alteration to existing dwelling
20079	83 Ballynahinch Rd	5	-5	Y/2015/0029/F - Retrospective (complete)
20080	Adj 10 & 15 Baronscourt Lane	2	2	Y/2014/0039/F - Expires 18.01.20
20081	Rear of 2 Thompsons Grange	1	1	LA05/2016/1246/F
20087	644 Saintfield Rd	7	7	LA05/2017/1114/O – Granted 02.01.20
20288	81 Ballynahinch Rd	11	11	LA05/2018/1135/F - 11no. Approved
20911	41 Hillsborough Rd	1	1	N/A
21111	44 Hillsborough Rd	2	-2	Y/2011/0217/F - Expired
21291	51 Hillsborough Rd	2	-2	LA05/2015/0693/F – Alterations to existing dwelling
21292	Carryduff Shopping Centre, Church Rd	150	-109	LA05/2016/1245/F - 20no & LA05/2019/1270/F - 21no (41no. Total)
21522	Lands at Comber Rd - CF 04/05	94	-15	LA05/2018/1221/RM - 79no. Under Consideration
21533	Land adj Carryduff Baptist, Hillsborough RD	10	10	LA05/2016/0571/F
21564	57 Ballynahinch Rd	1	1	LA05/2015/0269/F
21572	Garden south of 33 Manse Rd	1	1	LA05/2017/0947/RM
21578	50 Hillsborough Rd	19	19	Y/2014/0160/F (19no) - Expires 21.04.21
		1057	-630	Revised Remaining Potential on Sites Not Started = 427

3.2.18 The above table illustrates how settlements may have significantly lower potential for future housing when considering live planning approvals, compared to that stated within the Housing Monitor Statistics and the DPS.

3.2.19 Furthermore, within the Housing Growth Study, Lichfields have identified an issue with the delivery of housing across the Council area. In response to this, they state that it will be important for LCCC to consider the future deliverability of sites to ensure the identified future housing growth can be delivered on sites across the Plan period. We would agree with this

statement, particularly in respect of existing zoned sites on which there has been no commitment to develop. This should be reflected in the existing remaining potential.

3.2.20 As the evidence within the DPS is inaccurate, this has the potential to result in significant inconsistencies between the Draft Plan Strategy and Local Policies Plan and could negatively impact upon the delivery of housing over the Plan period. On this basis, it cannot be determined at this stage if further housing lands will be required within the Local Policies Plan. Furthermore, from discussions with the Council, we understand accurate and up to date housing monitor information is currently being prepared but will not be available prior to the end of the DPS consultation period. As such, the publication of the Draft Plan Strategy was premature as it could not consider the most robust evidence, particularly when existing commitments have largely informed the allocation of housing. It is not clear what the Council's strategy will be at Local Policies Plan stage, should the latest Housing Monitor identify a major reduction in remaining potential, considering there is no strategic policy for the zoning and management of housing land.

3.2.21 The Council have indicated that existing commitments have been reduced by 10% due to the possibility of non-deliverability of sites over the Plan period. Whilst we appreciate this methodology in order to ensure there is adequate availability of housing land, we do not agree this should not be used to reduce the overall allocations to individual settlements.

Urban Capacity Study

3.2.22 The Council have carried out an Urban Capacity Study in respect of settlements which comprise a population of over 5,000. We support that this study is used to inform the DPS document, however, we have concerns regarding the accuracy of information. For example, in respect of Carryduff, there are 8 no. urban capacity sites identified for further review. The potential yield for all of these sites is calculated at 25 dph, however a range of house types are identified between sites (detached, semi-detached, townhouses). As such, a blanket density is not appropriate. In addition, Site 211 retains a site area of 0.7ha, however, the site area is 0.54ha and there is a planning approval on the site for community uses. Furthermore, the majority of the sites identified are partially within a floodplain or LLPA and as such do not represent the most appropriate sites for residential development within Carryduff.

3.2.23 In addition to the sites identified within the UCS, lands within the settlement limit, which are currently zoned for other uses but have not been developed should also be reviewed. These sites have already been assessed as suitable for development and may be more appropriate for residential development than the use they are currently zoned for. This is particularly pertinent in respect of existing employment lands, of which there is a significant surplus compared to the identified requirement over the Plan period. This will be further discussed in **Section 4** of this representation.

3.2.24 The Urban Capacity Study should therefore be reviewed and amended accordingly to ensure the DPS is based on an accurate and robust evidence base.

Allowance for Windfall Housing

3.2.25 We accept the Council's assessment of windfall housing. However, as per existing commitments and the urban capacity study results, this should be compared to strategic allocations for individual settlements in order to inform whether the settlement is able to deliver its strategic allocation within its existing limits.

Housing Needs Assessment/Housing Market Analysis

3.2.26 As stated within the DPS, there is a requirement for 6,240 affordable housing units over the plan period, of which 2,400 are social housing units. The Council have identified that the deliverability of affordable housing will largely depend on the zoned sites remaining to be developed and other urban capacity/windfall sites. Firstly, as the deliverability of these lands has not been assessed at this stage, it is inappropriate to assume these will come forward for residential development during the plan period and a reliance on these sites for the provision of affordable housing is unrealistic. Therefore, the reliance of the Council on existing committed sites will result in difficulty in providing affordable housing units.

3.2.27 This is particularly relevant in certain settlements such as Glenavy. Glenavy currently has a social housing requirement of 70 no. dwellings over the Plan period, which does not take into account further affordable housing requirements. Following a desktop study of planning permissions in the Village, we have found that there are no lands currently zoned for housing which do not benefit from live planning permission. Furthermore, there has been no assessment of urban capacity or windfall sites in the settlement and as such, there is little to no scope of providing further affordable housing within the Village.

3.2.28 The Council have also stated that any future identified shortfall in affordable housing may be addressed at LPP stage through the zoning of land for affordable housing. We wish to state at this stage that this strategy is not consistent with the Council's overall strategy to ensure mixed tenure developments and is therefore unsound. The Housing Needs Assessment should therefore inform whether additional general housing lands are required within settlements to accommodate sustainable, mixed tenure developments.

Application of a sequential approach

3.2.29 We agree with the use of a sequential approach to housing lands within settlements of 5,000 people or more, but this must be informed by accurate evidence as identified above.

Transport Assessments

3.2.30 The Council’s text in respect of Transport Assessments at Page 61 of the DPS Part 1, does not relate to the allocation of housing in settlements. The Council should identify how Transport Assessments have influenced their housing allocations which will link to the Housing Evaluation Framework.

3.3 Changes to the Draft Plan Strategy

3.3.1 Based upon the above commentary, we respectfully suggest the following amendments are made to ensure the Plan Strategy is Sound, as detailed in **Table 10**.

- *Amendment 1:* Provide a strategic housing allocation between settlement tiers and individual settlements which manages growth in line with the Council’s growth strategy and considers the provided evidence, this can then be compared to existing commitments
- *Amendment 2:* Review existing commitments and urban capacity sites to ensure these are accurate and compare these to allocations between settlements
- *Amendment 3:* Remove reference to there being sufficient housing land supply
- *Amendment 4:* Provide strategic policy for the zoning and management of housing lands within settlements

Table 10: TSA suggested changes in relation to tests of soundness

<i>Soundness Test C1 – Did the Council take account of the RDS</i>
The proposed amendments take account of the RDS in relation to allocating housing land, particularly in respect of the Housing Evaluation Framework.
<i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i>
In line with the SPPS, the amendments provide for managed housing growth and allow for the provision of housing to individual settlements, ensuring sustainable patterns of development.
<i>Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow</i>

The amendments will allow for the LDP to follow a coherent strategy which flows from the strategic objectives to the allocation of housing between settlements. This will allow for coherence between the Plan Strategy and Local Policies Plan.

Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

The proposed amendments consider the available evidence which should inform housing allocations. As such, the allocations are appropriate to the role of individual settlements.

Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances

The current DPS does not allow for changes to committed housing figures within settlements. Through strategically allocating housing this ensures that if existing provisions are reduced prior to Local Plan Policies stage, this can be addressed appropriately.

4. **DPS Part 1: Strategic Policy 11 - Economic Development in Settlements**

4.1 Summary

- 4.1.1 We are generally supportive of the Council's Strategic Policy 11 in respect of Economic Development in Settlements. However, we believe that the Council's strategy of bringing forward all undeveloped employment sites from existing development plans is unsound as identified at **Table 11** and our detailed response below.

Table 11: Summary of Relevant Soundness Tests

<i>Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow</i>
The current strategy set out by the Council does not support the coherent designation of economic and residential development lands at Local Policies Plan stage.
<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i>
The Council's methodology for the Strategic Employment Allocation is to bring forward previously zoned lands. This does not take account of a complete or robust evidence base, such as lands within existing employment use but which are currently unzoned, or whether lands are available for employment use. It is appropriate to consider the release of existing zoned employment lands for alternative uses if these are more suitable and should these be required within settlements.

4.2 Detailed Response

- 4.2.1 We are supportive of the Council's objective to support a thriving and diverse economy and agree with the evidence provided within Technical Supplement 3 in respect of the required amount of employment land over the Plan period. It is the Council's intention to retain all existing employment zonings which comprises 220ha of potential lands. This affords ample provision to allow choice and flexibility of economic development sites in line with the provisions of the SPPS.
- 4.2.2 However, the Council have not assessed a number of existing unzoned brownfield employment sites which are currently underutilised and would represent more sequentially preferable locations for economic development. This has the potential to further increase the 220ha of future employment lands which are currently zoned.

4.2.3 Therefore, given the quantum of land zoned, it is possible for the Council to identify lands previously zoned for employment uses which are suitable for alternative uses without undermining the Council's employment strategy. In order to promote sustainable forms of development, as required by the SPPS, existing undeveloped sites should be fully assessed in respect of their potential to deliver alternative uses such as residential development. This could provide for additional housing where there is a requirement for same, and negate against extensions to the existing settlement limit where this could be avoided.

4.2.4 We acknowledge that Lichfields have carried out an Employment Land Review (Technical Supplement 3) which includes a full Employment Land Evaluation Assessment in line with the RDS 2035. However, the Council have not fully assessed this provided evidence base as there is no identification as to whether existing zoned sites would be more suited to alternative uses.

4.2.5 As such, existing undeveloped (greenfield) economic sites should be assessed within the Urban Capacity Study in respect of residential development. These lands have previously been deemed acceptable for development and may represent more suitable and appropriate locations for residential development than those identified within the Council's Urban Capacity Study. This will allow the Council to rezone lands for residential development if appropriate and required, without extending the existing settlement limits where possible. However, should it be deemed that there is no need for additional residential lands, or the identified lands would be incompatible with residential development, sites should be retained for economic development to increase flexibility and choice.

4.3 Changes to the Draft Plan Strategy

4.3.1 Based upon the above commentary, we respectfully suggest the following amendments are made to ensure the Plan Strategy is sound, as detailed in **Table 12**.

- *Amendment 1:* Review the Strategic Employment Allocation strategy to allow for flexibility and consideration of alternative uses; identifying and zoning suitable (currently unzoned) employment sites; considering the release of previously zoned employment lands in BMAP to other uses such as residential; and
- *Amendment 2:* Add sentence to the Draft Plan Strategy clarifying that identified employment sites are indicative only at this stage and the zoning of land to make up the Strategic Employment Allocation of 220ha is to be undertaken at LPP stage.

Table 12: TSA suggested changes in relation to the tests of soundness

<i>Soundness Test CE1 – The DPD sets out a coherent strategy from which its policies and allocations logically flow</i>
The proposed amendments will provide a coherent strategy from which designations within the Local Policies Plan would logically flow.
<i>Soundness Test CE2 – The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base</i>
The amendment will provide a robust evidence base and ensures the consideration of relevant alternatives where these would promote sustainable patterns of development.

5. Carryduff

- 5.1 Given the evidence presented in this report and following a more detailed review of existing commitments and urban capacity sites, we believe there will be an identified need for further housing lands within Carryduff.
- 5.2 Table 3 of the Draft Plan Strategy identifies existing commitments and urban capacity within Carryduff for further housing lands. However, a number of these sites have since been built out or planning permission expired. Given the indicative allocations set out within this representation we believe there will be a need for c.659 no. dwellings in Carryduff over the Plan period, with only 427 no. dwellings currently committed on sites not started.
- 5.3 As such, once a robust assessment has been carried out, we believe further, more appropriate housing lands will be required to facilitate the delivery of housing growth. We will assess this further at Local Policies Plan stage and whilst we appreciate that any residential designations are reserved for this stage, we felt it would be expedient to make the Council aware at this point that our client would be committed to bring the lands identified at **Annex 2** forward for residential development within the plan period should these be required at Local Policies Plan stage. As such, these lands are *available* and would assist in *delivering* the minimum housing growth figure in line with the Draft Plan Strategy.
- 5.4 The identified lands measure c.6.8ha and are located to the South of Carryduff as shown at **TSA 2** below. The site is strategically situated in close proximity to the A26 Ballyhanhinch Road which connects the site with Belfast City Centre.



TSA 2: Site Location

- 5.5 The site lies within the current settlement limit for Carryduff forms part of zoned employment site Ref: CF05 within the version of BMAP purported to be adopted. The lands are bound by existing residential development at Oakwood Meadow to the north and Black Quarter Lane to the East. Residential development at 'Black Quarter Meadow' to the north and east of the site is currently under construction by our client, comprising 108 no. new family homes (Ref: LA05/2017/0709/F). The southern portion of the site is bound by existing employment development to the east and the remainder of employment zoning CF 05 is located to the south, as identified at **Annex 3**. There are agricultural fields, outside of the settlement, located to the west.
- 5.6 The subject lands are able to be accessed through the adjacent residential development at Black Quarter Meadow which is currently under construction. This adjacent residential development includes the provision of a right-hand turn lane at Ballynahinch Road which should have capacity to serve any future development on the subject site. Although the lands are currently zoned as employment land within BMAP (quashed), we believe that consideration should be given to the adjacent land uses and as such residential development would be more compatible with same. This was acknowledged by the Council within Appendix 4 of Technical Supplement 3 which states there is pressure from non-employment uses at this site. The lands are currently located within the settlement limit and would promote sustainable development through removing a need to extend into the surrounding countryside. Furthermore, the remainder of employment zoning Ref: CF 05 to the south of the subject site would be preserved for employment use and would retain flexibility and choice of employment lands within Carryduff together with remaining undeveloped land at Zoning Ref: CF06 (East Carryduff); CF10 (North Carryduff) and CF11 (East Carryduff).
- 5.7 The site represents an appropriate location for residential development as evidenced at **Annex 4**, and promotes sustainable development through ensuring appropriate and available housing lands within the existing settlement limit. Furthermore, Key Site Requirements could be included within the Local Policies Plan to ensure a landscaped buffer between the subject lands and the remaining CF05 economic development lands to the south, ensuring a quality residential environment.
- 5.8 For the reasons set out above, we respectfully request the Council retain **Section 5** of this representation to inform the Local Policies Plan stage, whereby the identified site would allow for appropriate residential development, assisting in delivering residential dwellings in a sustainable location which meet the required housing growth within the plan period.

6. Conclusions

- 6.1 In conclusion, this representation has assessed the published Draft Plan Strategy in respect of the Strategic Policies 08 and 11 and found same to be unsound, taking in to account the soundness tests set out in Development Plan Practice Note 6 – Soundness.
- 6.2 The representation has analysed the overall Strategic Housing Allocation number and identified this should be increased to a figure of 12,260 dwellings in order to take account of local evidence and published HGIs, allowing reasonable flexibility to deal with a change in circumstances.
- 6.3 The allocation of housing growth between individual settlements has not been appropriately carried out by the Council and as such TSA have set out Indicative allocations taking consideration of all evidence including the Council's HEF contained within the Settlement Appraisals.
- 6.4 The representation has suggested amendments in respect of the Council's methodology in respect of Economic Development in Settlements, particularly in relation to the potential of existing employment sites being considering for alternative uses if required.
- 6.5 For the reasons set out within this representation we respectfully request the stated amendments are supported and brought forward within the adopted Plan Strategy.
- 6.6 Additionally, whilst we appreciate that any extensions and residential designations are reserved for Local Policies Plan stage, we respectfully request the Council retain **Section 5** of this representation to inform the Local Policies Plan stage, whereby the identified site would form a suitable location for future housing within the Town of Carryduff.

ANNEX 1

TSA SUGGESTED HOUSING ALLOCATIONS – HEF ADJUSTMENT

ANNEX 1 - TSA Allocation to Settlements - HEF Adjustment

Settlement	Population	Households	% of Settlement Tier	Base Allocation	HEF Adjustment	Adjusted Allocation	Adjusted % of Settlement Tier	Final Adjusted Allocation	Adjusted HEF Allocation Rounded
City									
Lisburn	45,410	18,415	100	4728					4728
Greater Urban Areas									
Lisburn GUA		1,979	13.87	461					461
Castlereagh GUA		12,287	86.13	3113					3113
Total		14,266	100	3574					3574
Towns									
Carrycluff	6947	2574	43	695	5	729.75	40.85	658.92	659
Hillsborough and Culcavy	3953	1729	29	468	20	561.6	31.44	507.09	507
Moira	4584	1737	28	451	10	496.1	27.77	447.95	448
Total		6040		1614		1787.45		1613.95	1614
Villages									
Ahgalée	863	300	6.04	83.63	-5	79.44	5.87	81.18	81
Annahilt	1045	371	7.47	103.42	-10	93.08	6.88	95.10	95
Dromara	1006	399	8.04	111.22	0	111.22	8.22	113.65	114
Drumbeg	813	321	6.47	89.48	-10	80.53	5.95	82.29	82
Drumbo	375	157	3.16	43.76	-10	39.39	2.91	40.25	40
Glenavy	1791	596	12.00	166.14	5	174.44	12.89	178.24	178
Lower Ballinderry	912	328	6.61	91.43	0	91.43	6.76	93.42	94
Maghaberry	2468	886	17.84	246.97	0	246.97	18.25	252.36	253
Miltown	1499	571	11.50	159.17	-5	151.21	11.17	154.50	155
Moneyreagh	1379	516	10.39	143.84	5	151.03	11.16	154.32	154
Ravernet	564	212	4.27	59.10	-10	53.19	3.93	54.34	54
Stoneyford	605	213	4.29	59.37	-5	56.41	4.17	57.63	58
Upper Ballinderry	226	95	1.91	26.48	-5	25.16	1.86	25.71	26
Total		4965		1384		1353.49			1384



Project:
Carryduff - LCCC DPS Response

Client:
Rosemount Homes (Carryduff) Ltd.

Drawing Title:
Site Location

Drawing No:
TSA 1870-001

Date:
December 2019

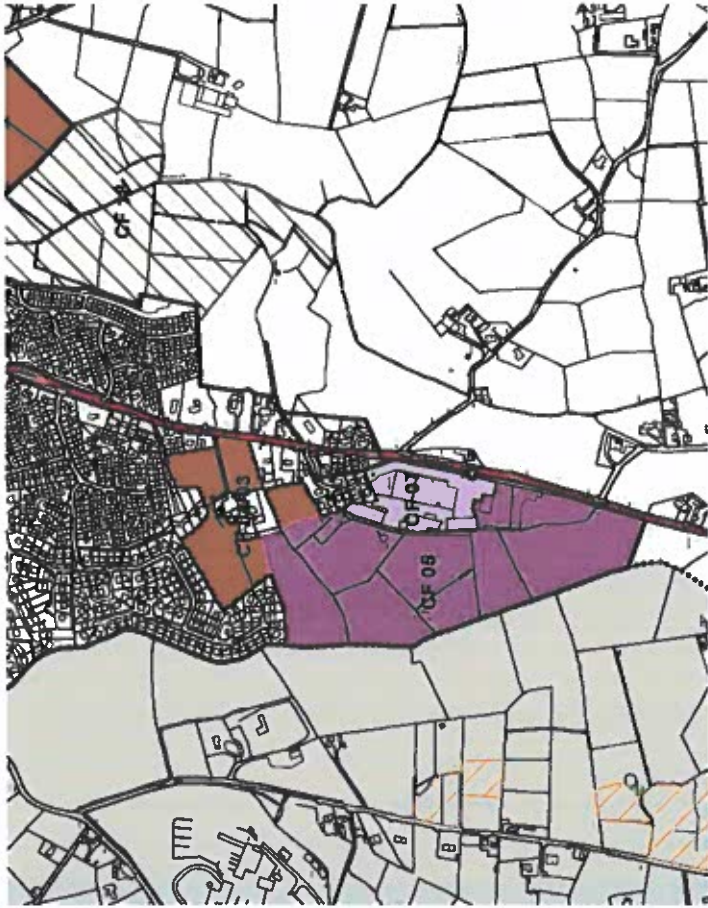
Revision:

20 May Street,
Belfast.
BT1 4NL
T: 028 9043 4333
E: info@tsaplanning.co.uk
W: www.tsaplanning.co.uk

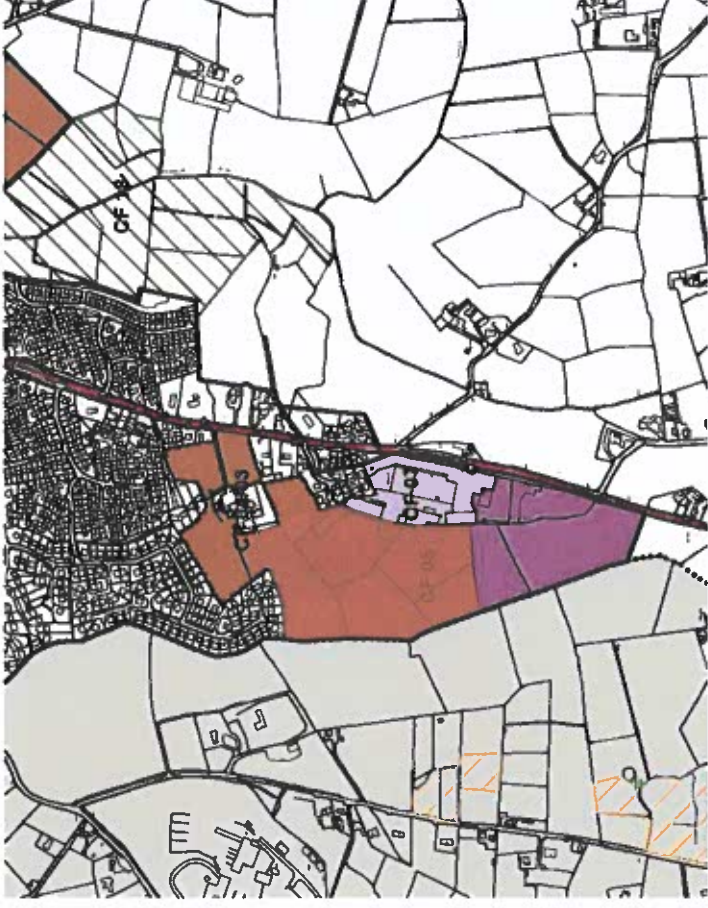


ANNEX 3

EXISTING AND PROPOSED AREA PLAN MAPS



Existing Area Plan



Proposed Area Plan

ANNEX 4

ADJACENT RESIDENTIAL DEVELOPMENT

Project:
Carryduff - LCCC DPS Response

Client:
Rosemount Homes (Carryduff) Ltd.

Drawing Title:
Proposed Housing + Adjacent Approval

Drawing No:
TSA 1870-002

Date:
December 2019

Revision:

20 May Street,
Belfast.
BT1 4NL
T: 028 9043 4333
E: info@tsaplanning.co.uk
W: www.tsaplanning.co.uk



Potential Residential 

Employment 

Existing Settlement Limit 