

LISBURN AND CASTLEREAGH LOCAL DEVELOPMENT PLAN 2032

Draft Plan Strategy Representation

Strategic Policy 08 and HOU10

Legacurry, Morningside, Annahilt & Hillsborough

Cherrytree Holdings Ltd.

January 2020

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

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1. Introduction

- 1.1 This representation has been prepared by **TSA Planning** on behalf of our client **Cherrytree Holdings Ltd.** in respect of Lisburn and Castlereagh City Council's published Draft Plan Strategy (DPS), for their Local Development Plan 2032.
- 1.2 The paper assesses Strategic Policy 08 and Policy HOU10 within the Draft Plan Strategy including the associated amplification text which we believe is **unsound** in its current form.
- 1.3 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 wider content of the DPS (inc. accompanying assessments & 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; 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.
- 1.4 **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.
- 1.5 **Section 3** relates to the Council's Strategic Housing Allocation identified at Table 3 of the DPS.
- 1.6 **Section 4** assesses Policy HOU10 Affordable Housing in Settlements and associated amplification text.
- 1.7 **Sections 5-8** identify & assess potential lands in Legacurry, Morningside, Annahilt & Hillsborough.
- 1.8 **Section 9** sets out Conclusions in respect of this representation.
- 1.9 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>
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.
<i>Soundness Test C3 – Did the council take account of policy and guidance issued by the Department</i>
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.
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.
<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 (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 dwelling (2015-18), which stills falls significantly below that of 2005/05/07 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. Similar to the Council's approach, this has then been increased by 10% to 12,260 dwellings 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 overleaf at **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 Settlements 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 (12.9%)
Total no of units	11,578	12,453	12,627	13,782	13,782
Total % of HGI	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** overleaf 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
Miltown	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**) 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. Following a desktop study, we have identified changes in the Housing Monitor Statistics from those stated within the Draft Plan Strategy in respect of several settlements. These numbers are reduced by more than the 10% which was allowed in the DPS to counteract deliverability issues, indicating that more than 10% of sites in settlements could be undeliverable. 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.
- 3.2.18 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.
- 3.2.19 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 DPS 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 Policy Plan stage, should the latest Housing Monitor identify a major reduction in remaining potential, considering there is no strategic policy for zoning/management of housing land.
- 3.2.20 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

- 3.2.21 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.
- 3.2.22 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.
- 3.2.23 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

- 3.2.24 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

- 3.2.25 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.
- 3.2.26 This is particularly relevant in certain settlements such as Glenavy. Glenavy currently has a social housing requirement of 70no. 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.

- 3.2.27 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

- 3.2.28 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

- 3.2.29 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 overleaf 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 9: 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.
<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 proposed amendments consider the available evidence which should inform housing allocations. As such, the allocations are appropriate to the role of individual settlements.
<i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i>
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 2: Policy HOU10 – Affordable Housing in Settlements

4.1 Summary

- 4.1.1 We support the need for an affordable housing strategic Policy within the Draft Plan Strategy. However, Policy HOU10 is currently unsound in respect of the threshold and percentage provision stated within the Policy as identified at **Table 11** and our detailed response below.

Table 10: 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>
In its current form the DPS is unsound as the housing allocations are not coherent with Policy HOU10.
<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 current provisions of Policy HOU10 are unrealistic and inappropriate. The evidence provided to support the Policy is not sufficiently robust in order to justify such an onerous Policy.
<i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i>
Policy HOU10 is completely inflexible as it is overly onerous on developers and does not account for issues of viability in residential developments.

4.2 Detailed Response

- 4.2.1 We note that within the Housing Growth Study, Lichfields advise that affordability is a particular issue within the Council area, which supports the need for a percentage based policy approach in Lisburn and Castlereagh (Para. 9.4). However, Paragraph 4.36 of Technical Supplement 1 identifies that the specifics of the Policy have been simply derived from applying a 10% and 20% figure to previous planning applications over a 5 year period. From this the Council have identified that 2,040 affordable housing units could be provided through a 5 unit threshold and 20% affordable housing contribution. This evidence is not sufficient enough to support such an onerous policy.
- 4.2.2 To support their Draft Plan Strategy, Belfast City Council referenced a study carried out by the Three Dragons in respect of Affordable Housing and Developer Contributions. The study concludes that considering the impact of introducing a developer contribution specifically on small and micro businesses we find that such businesses make up a large part of the housebuilding industry and that there are particular issues they would face if a developer contribution scheme were introduced. Furthermore, the conclusion from the viability analysis is that for most of the region, a developer contribution scheme will not work.
- 4.2.3 Taking account of this evidence, it would appear that further research is required into the viability of Policy HOU10 and the impact it may have, particularly on smaller housebuilders. This is particularly important within Lisburn and Castlereagh whereby affordability and delivery of housing is already an issue as identified by Lichfields within their Housing Growth Study.

Whilst we appreciate the Council are aiming to deliver as many affordable housing units as possible, the current Policy has the potential to stymie residential development in general and as such could have a negative impact upon the affordability of housing.

4.2.4 We agree with the overall strategy to include a threshold and proportion for affordable housing within the Plan Strategy. However, we would suggest given the current market uncertainty, it is more appropriate and realistic to begin with a cautious interpretation of the Three Dragons report and include a phased introduction/approach to affordable housing as outlined below:

- 1 to 20 units Nil
- 21 to 50 units 10%
- 51 to 250 units 15 %
- 250 plus units 20%

4.2.5 Under the provisions of Plan Monitoring, the threshold and proportion figures could be amended after 5 years when the impacts of Brexit on the economy are more certain, a current viability assessment can be prepared and the success of the policy and its impacts on overall housebuilding can be assessed. This could be achieved through a similar statement to that within Policy H 8 of the Manchester Core Strategy which states "These thresholds will be subject to amendment over the lifetime of the Core Strategy to reflect changing economic circumstances". This presents a more preventative approach in relation to economic sustainability rather than remediating any significant damage caused to developers, through a Policy which is too restrictive.

4.2.6 In relation to making the Policy reasonably flexible, we suggest that the suitable alternatives for non-viable schemes includes exemption from the Policy. By way of example, this is included in Policy H 8 of the Manchester Core Strategy which states "Either an exemption from providing affordable housing, or a lower proportion of affordable housing, a variation in the proportions of socially rented and intermediate housing, or a lower commuted sum, may be permitted where either a financial viability assessment is conducted and demonstrates that it is viable to deliver only a proportion of the affordable housing target of 20%; or where material considerations indicate that intermediate or social rented housing would be inappropriate."

4.2.7 Although the above may provide a lower level of affordable housing provision than anticipated by the Council, this will be significantly supported by SMU 01 West Lisburn/Blaris, which would provide c. 300no. social housing units. This Strategic Mixed Use site provides the perfect opportunity to support a balanced, mixed tenure community in line with the Councils overall Strategy. This would assist in delivering the social housing requirement in Lisburn City and will reduce the onus on smaller developers whereby financial viability may hinder development.

4.2.8 Lastly, Policy HOU10 identifies that affordable housing may be provided through specific zonings where a need has been identified by the Northern Ireland Housing Executive at Local Policies Plan stage. We wish to identify that this is contradictory with the Councils strategy which states that affordable housing should be delivered through mixed tenure developments which offer high quality of design to help promote community cohesion and sustainable neighbourhoods in line with regional policy. As such, where a need is identified, sufficient land should be zoned for housing to allow for a percentage of affordable housing on mixed tenure developments.

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:* Amend Policy HOU10 to reflect the thresholds set out in paragraph 4.2.4
- *Amendment 2:* Allow provisions for when the delivery of affordable housing is not viable
- *Amendment 3:* Ensure sufficient land is zoned within the LPP to allow for mixed tenure developments where a need is identified.

Table 11: TSA suggested changes in relation to the tests of soundness

<i>Soundness Test CE1 – The DPD sets out a coherent strategy for which its policies and allocations logically flow</i>
Amendment 3 allows for a coherent strategy which promotes mixed tenure developments
<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>
All amendments allow for the appropriate and realistic delivery of affordable housing taking account of all relevant evidence.
<i>Soundness Test CE4 – It is reasonably flexible to enable it to deal with changing circumstances</i>
Amendments 1 and 2 allow for a change in market circumstances which will not hinder housing development over the Plan period.

5. Legacurry

- 5.1 Our client is the owner of a parcel of lands adjacent to the development limit, east of Comber Road and to both the north and south of Ballynahinch Road. This takes the form of two parcels of land; Site A to south of Ballynahinch Road, east and adjacent of Thorndale Halls, and Site B north of Ballynahinch Road to the rear of Legacurry Presbyterian Church (see **Annex 2a**). Representation was initially made on these lands at the POP stage of the LDP process (Ref: PR/PP/109).
- 5.2 The existing settlement limit is too restrictive in that there is presently limited scope for new development and growth. Cognisant of this, our client wishes to make the Council aware that their land holding is available for inclusion within any revised settlement boundary, to ensure that Legacurry has sufficient scope and opportunity for sustainable growth.

Strategic Context

- 5.3 Legacurry is located c. 4.8 miles southwest of Lisburn and c. 4 miles east of Hillsborough, connected to the M1 Motorway c. 3.7 miles to the north at the Junction 7 with Sprucefield Regional Shopping Centre (see **TSA 2** below). The NISRA headcount of 2015 estimated the population at 82no. persons across 31no. households. Legacurry currently has a limited range of services and facilities, characterised by residential development. This primarily takes the form of large detached dwellings on varying plot sizes, with compact residential developments also at Thornbrook to the northwest and Gracefield Manor to the northeast. Riverdale Primary School is one of the few employment locations with the settlement, with Legacurry Presbyterian Church providing community facilities on Comber Road.



TSA 2: Legacurry Strategic Context

- 5.4 Our client's lands surround Legacurry to the west (see **TSA 3** below). Site A measures c.2.4Ha (c. 5.9ac) and are located to the south of Ballynahinch Road, with Comber Road at its western boundary and agricultural outbuildings of Cherry Tree Farm (310 Upper Ballynahinch Road) to the east. The Ravernet River forms the southern boundary. A small area of hardstanding, serving as a private car park, fronts on to Ballynahinch Road to the front of this site. The lands are relatively flat, with a well defined mature vegetation boundary to the rear along Ravernet River, with access existing on Ballynahinch Road at the private car park opposite Legacurry Presbyterian Church graveyard. Site B falls to the rear of the Presbyterian Church on Comber Road, extending to c. 4.6Ha (c. 11.3ac). These lands rise gently from Upper Ballynahinch Road towards a farm holding at the northern boundary. A location plan has been included at **Annex 2a**.



TSA 3: Legacurry Site Locations

- 5.5 Legacurry is proposed for retention as a Small Settlement within the LDP making up 1 of 33no. designated. These form 3% (3,950no. persons) of the District total. Having Level 1 Status within the RDS Settlement Hierarchy, it is recognised that Legacurry has very limited scale facilities, depending on larger settlements for health, entertainment and comparison and convenience goods. In order for Legacurry to sustainably function independently as a Small Settlement, provision of land must be made within the development limit for both housing and associated facilities. Paragraph 6.86 of the SPPS and 6.3.31 of the DPS identifies that the specific zoning of land is uncommon within the development limit of Villages and Small settlements. We are supportive of this flexible approach to ensuring sustainable development. The lands put forward include a variety of appropriate locations to consolidate the boundary of this Legacurry.
- 5.6 The Lisburn & Castlereagh LDP Settlement Appraisal recognises there is limited capacity or land to accommodate future development opportunities within Legacurry. Our client's lands at Site A have been noted as possessing potential for infilling adjacent to the approved overflow carpark

fronting Ballynahinch Road. As highlighted within the LDP Housing & Settlements Position Paper, Small Settlements act as the focal point for rural communities. These lands will allow for natural growth over the plan period, while maintaining the rural character of Legacurry and building upon the current format of this Small Settlement; focusing development around a rural cluster and junction of Comber & Ballynahinch Roads. Consolidation of the development limit to include these lands would provide opportunity for additional small housing groups and rural businesses.

- 5.7 We support consolidation of development to the built urban form of Small Settlements, so that future expansion is facilitated in a sustainable pattern. Given such, these lands adjacent to the current development limit represent substantial opportunity for compact growth. Whilst we appreciate that any extensions and residential designations are a matter for Local Policies Plan stage, we feel it is expedient to make the Council aware at this stage that should these lands be included with the development limit of Legacurry, our client is committed to bring these forward within the plan period. As such, these lands are *available* and would assist in *delivering* the minimum housing growth figure.

6. Morningside

6.1 Our client wishes to make the Council aware of lands adjacent to the current development limit of Morningside, to the west of Ballynahinch Road (see **Annex 2b**). Representation was initially made on these lands at POP stage of the LDP process (Ref: PR/PP/110). Cognisant this location will continue to be considered as open countryside until a development limit is defined at Local Policies Plan stage, our client seeks to make the Council aware at that their land holding is immediately adjacent to the current built up frontage. The lands are presented for consideration when plotting the settlement boundary, to ensure that the Small Settlement has sufficient scope and opportunity for sustainable growth.

Strategic Context

6.2 Morningside is situated c. 2.5 miles southwest of Lisburn City Centre and c. 2 miles northeast of the Ravernet. The M1 Motorway runs c. 0.4 miles to the north, at the Saintfield Road Junction 6 exit (see **TSA 4** below). The NISRA headcount of 2015 estimated the population at 55no. persons across 24no. households. The north-eastern boundary is formed by Limehill Road, which runs in a southerly direction parallel to the Ballynahinch Road. The settlement is characterised by the 24no. residential households previously highlighted. These take the form of large detached dwellings on large individual plots. Bus routes 26 and 526 connect Morningside onward to the larger settlements of Lisburn, Dromara and Ballynahinch. No community or employment locations currently exist within the development limit.



TSA 4: Morningside Strategic Context

6.3 Our client's lands sit directly adjacent to the development limit on the western side of Ballynahinch Road formed by two fields; north of No. 176 and south of No. 178. These lands extend to c. 2.0Ha (c. 4.9ac) in total, approximately 1Ha each (see **TSA 5** below). Fronting on to Ballynahinch Road, the sites are directly opposite to the strong built frontage of dwellings. This extends from No. 161 to No. 195 Ballynahinch Road, measuring c. 590m and encompassing

the length of the Small Settlement. The lands are relatively flat, with no significant distinguishing landscape or heritage features, bounded by laneways serving adjacent dwellings. The LLPA designated within Morningside (Ref: MS 02) is opposite and outwith the curtilage of the lands.



TSA 5: Morningside Site Locations

- 6.4 Housing Monitor figures as of 31st March 2017 indicated remaining potential of only 2no. units on 0.12Ha. This demonstrates the confined nature of the development limit. Of these lands, and since the previous Housing Monitor was undertaken, there has been an additional approval on monitored lands within the settlement (Site Ref 19128 – Site Adjacent to 159 Ballynahinch Road: LA05/2019/0897/O for 1no. dwelling). In addition, a recent infill completion between these two portions of land (Lands to the rear of No. 178 Ballynahinch Road – Ref: LA05/2015/0779/F) has increased the built frontage on this western side of Ballynahinch Road and linking the two sites together. There is no capacity currently within Morningside to allow for any form of future development or growth throughout the plan period.
- 6.5 We are supportive of Morningside being proposed as a Small Settlement within the LDP. Having Level 1 Status within the RDS Settlement Hierarchy, it is recognised at there are very limited scale facilities with the Small Settlement depending on those nearby larger settlements for health, entertainment and comparison and convenience goods. In order to sustainably function as a Small Settlement, adequate and available provision of lands must be made available within the development limit to allow Morningside to operate independently.
- 6.6 Paragraph 6.86 of the SPPS and 6.3.31 of the DPS identifies that the specific zoning of land is uncommon within the development limit of Villages and Small settlements. We are supportive of this flexible approach to ensuring sustainable development and are of the opinion that these lands have capacity to facilitate development of an appropriate form and scale, in keeping with the settlement's function. An indicative Settlement Development Limit has been included at **Annex 3b.**

- 6.7 Given such, these lands adjacent to the current development limit represent substantial opportunity for compact growth. Whilst we appreciate that any extensions and residential designations are a matter for Local Policies Plan stage, we feel it is expedient to make the Council aware at this stage that should these lands be included with the development limit of Morningside, our client is committed to bring these forward within the plan period. These lands are therefore *available* to assist in delivering both housing growth and necessary associated services and facilities.

7. Annahilt

7.1 Regarding the Village of Annahilt, consideration is given to several sites adjacent to the current development limit. These are identified at **Annex 2c**. Representation was initially made on these lands at POP stage of the LDP process (Ref: PR/PP/112). These lands are presented for consideration for inclusion within any revised settlement limit at Local Policies Plan stage to ensure that the Village has sufficient scope and opportunity for sustainable growth. Our client is committed to bring these lands forward within the plan period. As such, the sites presented are *available* and would assist in *delivering* the minimum housing growth figure.

Strategic Context

7.2 The Village of Annahilt is located on the main Ballynahinch Road linking Ballynahinch to Hillsborough, both of which are c. 5.2 miles to the northwest and c. 4 miles to the southeast respectively. The Magheraconluce Road connects Annahilt southwards towards Dromara and Kinallen, while the Glebe Road provides links north to Legacurry. The Village is centrally located around the crossroads at Ballynahinch/Magherconluce/Glebe Roads, with current development spanning primarily east from here. There are no environmental designations within Annahilt, however two SLNCI's exist beyond the development limit to the west.

7.3 The NISRA headcount of 2015 estimated the population at 1,045no. persons across 371no. households. Residential densities across all developments ranging from 5.1dph on Ballynahinch Road to 71.4dph at West Wind Terrace. There are some services and facilities providing employment opportunities within the settlement (Places of Worship, Primary School, Convenience Store, Pharmacy, Residential Home etc.). Furthermore, a business park is located outside the development limit on Glebe Road to the north. The subject lands are defined in 3no. separate parcels. These are identified below at **TSA 6**;

7.4 Site A – Two agricultural fields extending to c.2.4Ha (c. 5.9ac), to the northeast of Annahilt on Glebe Road. The lands gently sloping from the residential development of Glebe Manor adjacent to the south, towards the business park to the north. These developments form the northern/southern boundaries, linking the business park with the settlement of Annahilt. There is an existing access point to the western boundary onto Glebe Road. A strong planted boundary to the eastern edge of the site ensures limited views of the site from the open countryside.

7.5 Site B – Broadly rectangular field adjacent to the southern development limit of c. 1.9Ha (c. 4.7ac), with established residential development to the north at Riverdale. Existing access point onto Magherconluce Road at the western boundary.

- 7.6 Site C – Parcel of agricultural lands (c. 7.8Ha / c. 19.2ac) to the south of Annahilt, directly abutting residential developments of Riverdale, Kernaghan Park and Woodfall Manor. The southern boundary of the site is formed by a tributary of the Ballynahinch River, with a possible future access point achievable via Kernaghan Park. The PAC previously considered that the lands directly south of Kernaghan Park are not prominent and would represent rounding-off (Obj. 137). Furthermore, the lands south of Woodfall Manor were viewed as providing opportunity for extension of the existing housing to the north.



TSA 6: Annahilt Site Locations

- 7.7 Our client is supportive of the DPS intention to retain Annahilt as Village. In line with the Lisburn & Castlereagh Settlement Appraisal, we wish to make the Council aware of the suitability of these lands to accommodate the future development highlighted if deemed to be required. Lands to the south of Annahilt have been identified as preferable for future consideration. An indicative Settlement Development Limit, inclusive of these sites, has been identified at **Annex 3c**.
- 7.8 The LDP promotes an overall build rate of 700no. dwellings per annum across the Borough. The overall remaining potential of residential units allocated to Villages & Small Settlements is 1,231no. dwellings, 11.7% of the total potential. As highlighted within the LDP Housing & Settlements Position Paper, Villages make for good locations for rural businesses and can accommodate residential development in the form of small housing estates, housing groups and individual dwellings.
- 7.9 Given such, these lands exist adjacent to the current development limit and represent substantial opportunity for compact growth of the Village, representing a clear rounding-off opportunity for Annahilt. Whilst we appreciate that any extensions and residential designations are a matter for Local Policies Plan stage, we feel it is expedient to make the Council aware at this stage that these lands are available and can assist in meeting the Council's housing growth requirements.

8. Hillsborough

- 8.1 The following section considers lands adjacent to the current development limit and directly abutting the residential development of Governor's Gate. These lands have been identified at **Annex 2d**. Representation was initially made at POP stage of the LDP process (Ref: PR/PP/113). Our client seeks to make the Council aware of these lands when considering the settlement boundary to ensure that the Town of Hillsborough has sufficient scope and opportunity for sustainable growth.

Strategic Context

- 8.2 Hillsborough is c. 4.7 miles to the south of Lisburn City Centre, and c. 2.4 miles to the south of the M1 Motorway at Junction 8 with Sprucefield. Hillsborough is one of two main towns throughout the Lisburn District along with Moira, operating as a service and employment centre. There are several areas of environmental and heritage designations throughout Hillsborough (SLNCI, LLPA and Conservation Area). The A1 road runs north to south connecting Lisburn and Dromore respectively, separating Hillsborough from Culcavy to the north. Hillsborough is formed in two distinct parcels; with commercial development and employment locations predominantly focused around Main Street, and residential development to the northwest portion of the Town.
- 8.3 The NISRA headcount of 2015 estimated the population at 3,953no. persons across 1,729no. households. There is a wide range services and facilities throughout Hillsborough to support sustainable housing growth; two schools, recreational open space and clubs, places of worship and community services. The subject lands lie to the northeast of Hillsborough, fronting on to Ballynahinch Road and directly adjacent to Governor's Gate (see **TSA 7** below). The lands are without environmental feature or designation and rise gently to the northeast, with the northern limit reflecting the existing field boundary. Extending to c. 4.5Ha (c. 11.1ac), the lands abut existing residential development along their entire western edge. There are possible access points from both the Ballynahinch Road and internally via Governors Gate.



TSA 7: Hillsborough Site Location

- 8.4 The LDP promotes an overall build rate of 700no. dwellings per annum across the Borough. The overall remaining potential of residential units allocated to Villages & Small Settlements is 421no. dwellings, 4% of the total potential. As highlighted within the LDP Housing & Settlements Position Paper, Hillsborough is well positioned on main route from Belfast to Newry/Dublin. It has been demonstrated there is a demand for new housing within this settlement through high year-on-year build rates, with an average of 27no. dwellings completed per year between '04-'17. This is reinforced by ongoing development of Governor's Gate and Farriers Green (HM Site Ref: 16558).
- 8.5 Table 11 of the Council Housing Growth Study indicates a remaining potential of 468no. units for Hillsborough. This is the same as the TSA Base Allocation identified at Table 6. As expanded upon in **Section 4**, upon review of these figures and taking in to consideration the Housing Evaluation Matrix, TSA adjusted allocations has adjusted this figure positively in favour of housing due to the high levels of service provision and existing facilities. Table 8 above now identifies a revised dwelling potential in Hillsborough of 507no. dwellings.
- 8.6 Given such, we believe Hillsborough will require additional lands to be designated for housing to meet this need. These lands are well suited to ensure future sustainable growth of Hillsborough in a compact form. The development of these lands for housing would be in keeping with the adjacent context, along with no impact upon sensitive environmental designations. The site benefits from heavy standard trees and a dense landscape boundary to the east, aiding integration at this location with the countryside. This site represents a rounding off opportunity, with an indicative Settlement Development Limit included at **Annex 3d**.
- 8.7 Whilst we appreciate that any extensions and residential designations are a matter for Local Policies Plan stage, we feel it is expedient to make the Council aware at this stage that our client is committed to bring these lands forward within the plan period. As such, the sites presented are *available* and would assist in *delivering* the minimum housing growth figure.

9.0 Conclusions

- 9.1 We are of the opinion that the Settlements of Legacurry, Morningside, Annahilt and Hillsborough require additional housing land in order to meet the existing demand for residential development within these Settlements. The proposed housing allocation set out in **Section 4** can be accommodated through the inclusion of our client's lands, with these providing a natural rounding off and infilling opportunities to the respective settlements.
- 9.2 This representation has assessed the published Draft Plan Strategy in respect of the Strategic Policies 08 and HOU10 and found same to be unsound, taking in to account the soundness tests set out in Development Plan Practice Note 6 – Soundness. It 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.
- 9.3 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.
- 9.4 The representation has suggested amendments in respect of the Council's Policy HOU10 Affordable Housing in Settlements which is currently too onerous on smaller house builders and is not currently founded on a robust evidence base.
- 9.5 For the reasons set out within this representation we respectfully request the stated amendments are supported and brought forward within the adopted Plan Strategy. Additionally, whilst we appreciate that any extensions and residential designations are reserved for Local Policies Plan stage, we respectfully request the Council retain **Sections 5-8** of this representation to inform the Local Policies Plan stage, whereby the identified sites would form a suitable extensions to each of the Settlements.

ANNEX 1

TSA Housing Allocation to Settlements – 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									
Carryduff	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									
Ahgalee	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
Milltown	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

ANNEX 2a

Legacurry Site Location



Project:
Legacy Lands - LCCC DPS Response

Client:
Cherrytree Holdings Ltd.

Drawing Title:
Site Location

Drawing No.:
TSA 2262-002a

Date:
January 2020

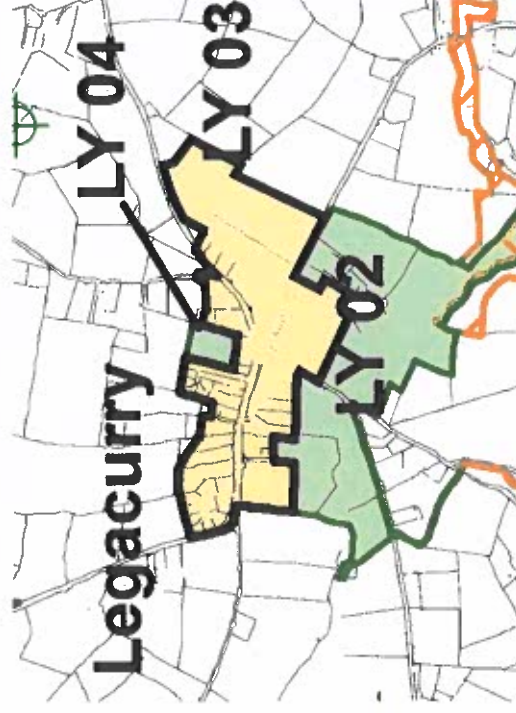
Revision:

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



ANNEX 3a

Legacurry – Proposed Settlement Development Limit



Existing Development Limit

Proposed Development Limit



ANNEX 2b

Morningside Site Location



ANNEX 3b

Morningside – Proposed Settlement Development Limit



Existing Development Limit



Proposed Development Limit

Project: Morningside Lands - LCCC DPS Response
Client: Cherrytree Holdings Ltd.

Drawing Title: Proposed Development Limit
Drawing No: TSA 2262-003b

Date: January 2020
Revision:

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ANNEX 2c
Annahilt Site Location



Project:
Annahilt Lands - LCCC DPS Reponse

Client:
Cherrytree Holdings Ltd.

Drawing Title:
Site Location

Drawing No:
TSA 2262-002c

Date:
January 2020

Revision:

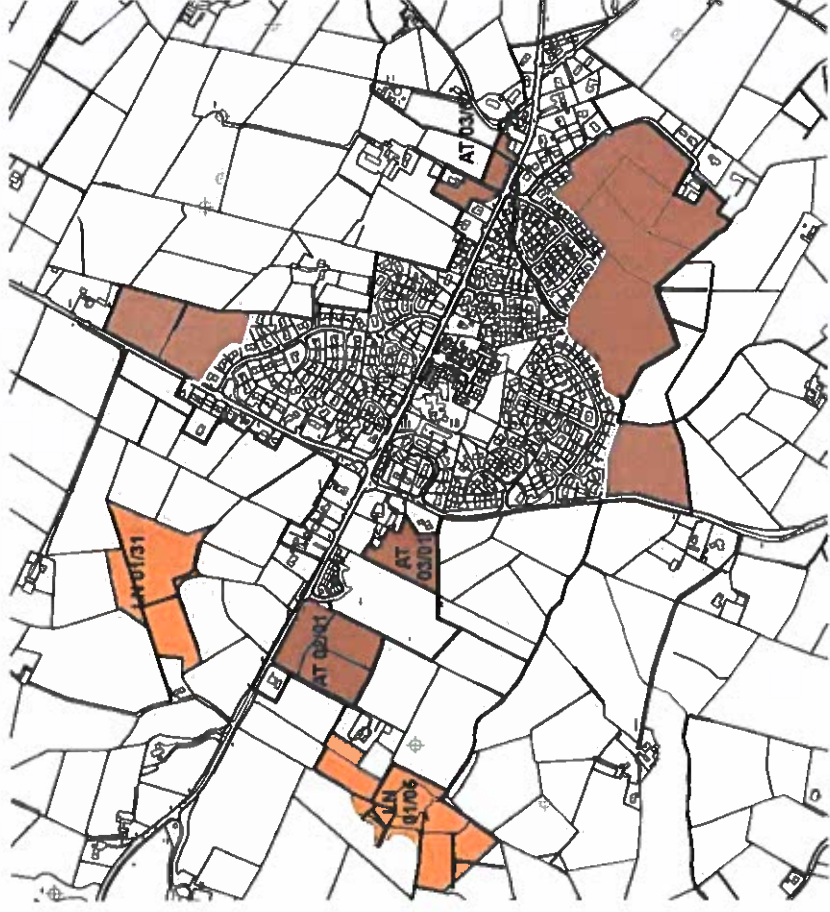
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W: www.tsaplanning.co.uk

ANNEX 3c

Annahilt – Proposed Settlement Development Limit



Existing Development Limit



Proposed Development Limit

ANNEX 2d

Hillsborough Site Location



Project: Hillsborough Lands - LCCC DPS Reponse
Client: Cherrytree Holdings Ltd.

Drawing Title: Site Location
Drawing No: TSA 2262-002d

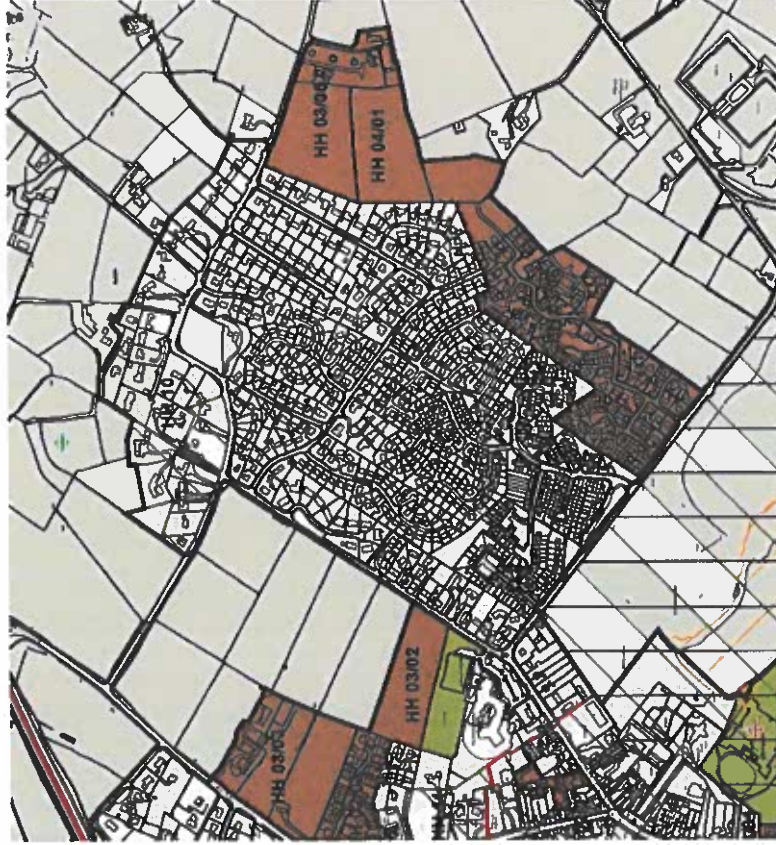
Date: January 2020
Revision:

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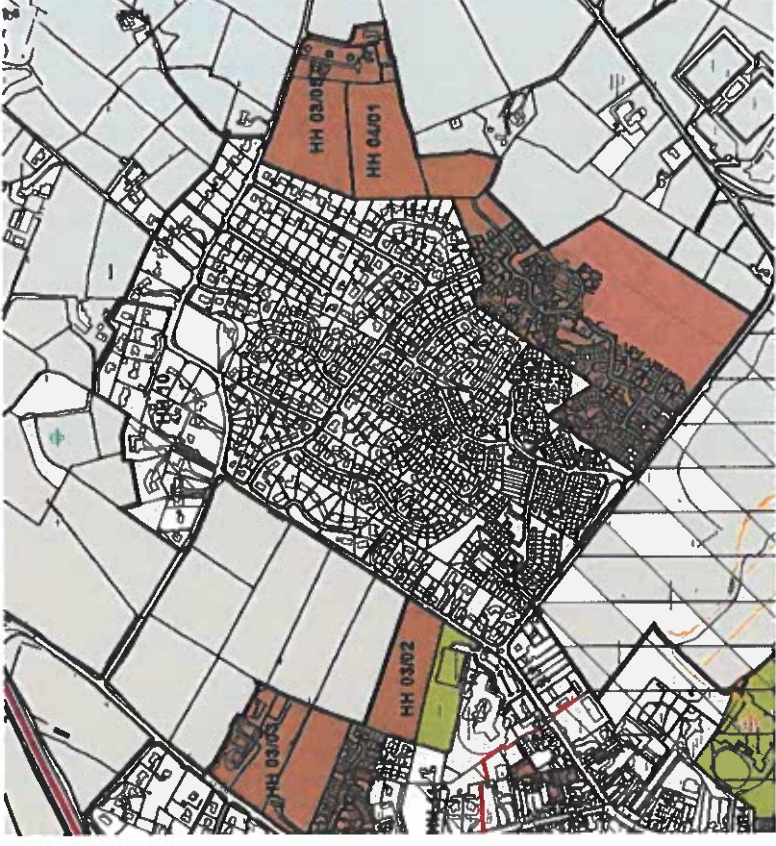


ANNEX 3d

Hillsborough – Proposed Settlement Development Limit



Existing Development Limit



Proposed Development Limit