

# LISBURN AND CASTLEREAGH LOCAL DEVELOPMENT PLAN 2032

Draft Plan Strategy Representation

Strategic Policy 08 and HOU10

Maghaberry



January 2020

## **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 [REDACTED] 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 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; 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 **Section 5** identifies and assesses potential housing lands within Maghaberry.
- 1.8 **Section 6** 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>
<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>
<p>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.</p>

*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 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%)
Moira	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%)
<b>Total Units</b>	<b>10,228 (97.4%)</b>	<b>875 (8.3%)</b>	<b>174 (1.7%)</b>	<b>1,155 (11%)</b>	<b>12,432 (118.4%)</b>
Strategic Mixed Use site West Lisburn/Blaris	1,350 (12.9%)				1,350 (14.2%)
<b>Total no of units</b>	<b>11,578</b>	<b>12,453</b>	<b>12,627</b>	<b>13,782</b>	<b>13,782</b>
<b>Total % of NGI</b>	<b>110.3%</b>	<b>118.6%</b>	<b>120.3%</b>	<b>131.3%</b>	<b>131.3%</b>

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 ( <b>TSA 1</b> ) 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
<b>GUA Total</b>	<b>14,266</b>	<b>31%</b>	<b>3574</b>
<b>Towns</b>	<b>6040</b>	<b>13%</b>	<b>1500</b>
<b>Villages</b>	<b>4965</b>	<b>11%</b>	<b>1268</b>
<b>Small Settlements</b>	<b>1630**</b>	<b>4%</b>	<b>461</b>
<b>Settlement Total</b>	<b>45,316</b>	<b>100%</b>	<b>11,531</b>

\* 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
<b>GUA Total</b>	<b>31%</b>	<b>31%</b>	<b>3574</b>
<b>Towns</b>	<b>13%</b>	<b>14%</b>	<b>1614</b>
<b>Villages</b>	<b>11%</b>	<b>12%</b>	<b>1384</b>
<b>Small Settlements</b>	<b>4%</b>	<b>2%</b>	<b>231</b>
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>11,531</b>

\* 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
<b>City</b>	
Lisburn	4728
<b>City Total</b>	<b>4728</b>
<b>Greater Urban Areas</b>	
Lisburn GUA	461
Castlereagh GUA	3113
<b>GUA Total</b>	<b>3574</b>
<b>Towns</b>	
Carryduff	695
Hillsborough and Culcavy	468
Moira	451
<b>Towns Total</b>	<b>1614</b>
<b>Villages</b>	
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
<b>Villages Total</b>	<b>1384</b>
<b>Small Settlements</b>	<b>231</b>
<b>Settlements Total</b>	<b>11,531</b>

*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
<b>City</b>									
Lisburn	H	H	M	H	H	H	M	H	-
<b>Towns</b>									
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
<b>Villages</b>									
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
<b>Small Settlements</b>									
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
Ballyskehagh	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
<b>City</b>		
Lisburn	4728	4728
<b>City Total</b>	<b>4728</b>	<b>4728</b>
<b>Greater Urban Areas</b>		
Lisburn GUA	461	461
Castlereagh GUA	3113	3113
<b>GUA Total</b>	<b>3574</b>	<b>3574</b>
<b>Towns</b>		
Carryduff	695	659
Hillsborough and Culcavy	468	507
Moira	451	448
<b>Towns Total</b>	<b>1614</b>	<b>1614</b>
<b>Villages</b>		
Ahgalee	84	81
Annahilt	103	95
Dromara	111	114
Drumbeg	90	82
Drumbo	44	40
Glenavy	166	178



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

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, following a desktop study, **Table 9** below identifies changes in the Housing Monitor Statistics from those stated within the Draft Plan Strategy in respect of Maghaberry. As shown within the Table, the actual remaining potential yield of 166 no. dwellings is significantly lower than the 269 no. dwelling identified within the 2017 Housing Monitor Statistics. Furthermore, the number is reduced by more than the 10% which was allowed in the DPS to counteract deliverability issues. This indicates that more than 10% of sites in settlements could be undeliverable.

**Table 9: Maghaberry Survey**

Site Ref.	Site Name	Status	HM Remaining Yield	Comments	Change in Yield
15228	Hammonds Farm	On-going	1	On-going	0
15229	Ashgrove	On-going	1	On-going	0
16466	Opposite No. 1 Arindale	Not Started	1	S/1999/0496 Expired	-1
16798	6b Maghaberry Rd	Not Started	5	No Change	0
16841	Elm Vale MY03/02	On-going	1	On-going	0
18114	Between 4 Maghaberry Rd & Methodist Church	Not Started	4	LA05/2017/1326/O for 4no. dwellings	0
18115	Adj 1 Trummery Lane MY 04/02	Not Started	5	LA05/2017/1326/O 7no. units approved Apr 19	+2
18763	Adj 31 Arindale	Not Started	1	S/2006/0245/F Expired 28.11.11	-1
19222	8B & 10 Old Road	Not Started	12	Expired Permission for 12no. (S/2007/1003/O)	-12
20602	15 Maghaberry Rd	Not Started	4	S/2007/0312/O Expired 01.03.15	-4
20692	Former Church Hall of Maghaberry	Not Started	2	S/2010/0588/F Expired 09.02.16	-2
21161	9-11 Glen Road	On-going	11	S/2008/0356/F for 13no. unit. Commenced on site	0
21342	Adj 4 Edenhill	Not Started	2	LA05/2016/0429/F Approved '17	0
21513	Land 100m NE of 20 Wellington Pk Av	Completed	20	On-going	0
<b>Total</b>			<b>70</b>		<b>-18</b>
				<b>Indicative Remaining Yield</b>	<b>52</b>

- 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 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.
- 3.2.21 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.

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 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.

3.2.28 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>

## 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 12: 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. Maghaberry

5.1 Our client [REDACTED] is the owner of a parcel of lands adjacent to the development limit, west of Willow Lodge and north of Spring Meadows (see **Annex 2**). Representation was initially made during at Public Local Inquiry of the Belfast Metropolitan Area Plan 2015, and subsequently at POP stage of the current LDP process. At POP stage of the LDP, the previous representation (submitted by Pragma Planning) also included an additional portion outwith the development limit to the west and south of Hammonds Road shown at **Annex 3**. Those additional lands no longer form the part of this representation.

### Strategic Context

5.2 Maghaberry is located c. 6.2 miles west of Lisburn and c. 2.8 miles northwest of Moira, connected to each via the main Lisburn/Moira A3 road. Furthermore the M1 Motorway is only c. 2 miles to the south, connecting northwards to Belfast and further west to Craigavon and beyond. There is a steep escarpment to the south of the Village, naturally defining this southern limit. The NISRA headcount of 2015 estimated the population at 2,468no. persons across 886no. households. Maghaberry benefits from a range of services and facilities (Places of Worship, Primary School, PFS, Pharmacy, Community Centre etc.), with residential densities across all developments ranging from 13dph at Ashgrove Park to 21dph at Edengrove Crescent.

5.3 The subject site measures c. 2.4Ha (c. 5.9ac) and is located to the northwest of Maghaberry. These lands are relatively flat, with well defined boundaries of mature vegetation at all sides. There is an exiting informal access point at Willow Lodge. The site lies adjacent to the current settlement development limit along both its southern and eastern boundaries, adjacent to the existing residential developments of Spring Meadow and Willow Lodge respectively. Both an aerial image and Area Plan extract are included below at **TSA 2** and **TSA 3**.



**TSA 2: Site Location**



**TSA 3: BMAP 2015**

- 5.4 Overall we would disagree with the growth allocation for housing of the DPS for Maghaberry. This is not realistic or appropriate for the Village. The housing allocation fails with regard to the Coherence and Effectiveness Test CE2 of Development Plan Practice Note 6. It does not consider all relevant evidence including the settlement appraisals, and the evidence on which the allocations have been based are inaccurate (HM 2017). The evidence presented identifies a potential need for further housing within Maghaberry over the Plan period.
- 5.5 Maghaberry is proposed for retention as a village within the LDP, making up 1 of 13no. villages. Whilst the DPS identifies a potential remaining yield of 70no. dwellings within Maghaberry on 2.83Ha, we have identified a requirement to further analyse this evidence. Given such, evaluation of housing land availability at December 2019 carried out by TSA, indicates that when current completions and expired permissions are taken into account, there is a remaining yield of 52no. dwellings (see **Table 13** below). Furthermore, as detailed previously within this response, solely basing allocations on existing commitments is inappropriate and we have endeavoured to set out indicative allocations for settlements at **Table 8**, which for Maghaberry, a strategic allocation of 252no. dwellings over the Plan period was identified.

**Table 13: Maghaberry Survey – December 2019**

Site Ref.	Site Name	Status	HM Remaining Yield	Comments	Change in Yield
15228	Hammonds Farm	On-going	1	On-going	0
15229	Ashgrove	On-going	1	On-going	0
16466	Opposite No. 1 Arindale	Not Started	1	S/1999/0496 Expired	-1
16798	6b Maghaberry Rd	Not Started	5	No Change	0
16841	Elm Vale MY03/02	On-going	1	On-going	0
18114	Between 4 Maghaberry Rd & Methodist Church	Not Started	4	LA05/2017/1326/O for 4no. dwellings	0
18115	Adj 1 Trummery Lane MY 04/02	Not Started	5	LA05/2017/1326/O 7no. units approved Apr 19	+2
18763	Adj 31 Arindale	Not Started	1	S/2006/0245/F Expired 28.11.11	-1
19222	8B & 10 Old Road	Not Started	12	Expired Permission for 12no. (S/2007/1003/O)	-12
20602	15 Maghaberry Rd	Not Started	4	S/2007/0312/O Expired 01.03.15	-4
20692	Former Church Hall of Maghaberry	Not Started	2	S/2010/0588/F Expired 09.02.16	-2
21161	9-11 Glen Road	On-going	11	S/2008/0356/F for 13no. unit. Commenced on site	0
21342	Adj 4 Edenhill	Not Started	2	LA05/2016/0429/F Approved '17	0
21513	Land 100m NE of 20 Wellington Pk Av	Completed	20	On-going	0
<b>Total</b>			<b>70</b>		<b>-18</b>
				<b>Indicative Remaining Yield</b>	<b>52</b>

- 5.6 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. Within our Settlement Appraisal Score Matrix (**Table 7**), Maghaberry placed more positively than the majority of other Villages in terms of services and facilities, indicating the settlement is preferential for future development of housing. The former Maghaberry Arms has also been redeveloped to provide a Petrol Filling Station, functioning as a Village centre with associated Pharmacy and Retail (S/2015/0002/F).
- 5.7 There are no significant parcels of zoned housing land within the development limit of Maghaberry to allow for sustainable expansion and future development. 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.
- 5.8 It has been demonstrated there is a demand for new housing within this settlement through high year-on-year build rates. This is reinforced by the advanced stage of development of c. 123no. dwellings at Wellington Park Road/Drive, on lands outwith the settlement development limit to the north of Maghaberry. This decision was taken by the Planning Committee of LCCC, stating there were overriding economic benefits of developing out the site through job creation and community benefit. In addition, the suitability of the site was highlighted along with compatibility with neighbouring properties and the general locality. Details of the application are as follows:

**Reference:** S/2014/0910/F

**Location:** Lands north of Wellington Parks and south of HMP Maghaberry, Maghaberry

**Proposal:** Development of 123 dwellings and amendment to 3 dwellings on sites 1, 125 and 126 (dwellings approved under S/2014/0209/F & S/2004/1466/F respectively) to give a total of 126 dwellings with associated open space and access arrangements

**Decision:** Permission Granted (5<sup>th</sup> April 2017)

- 5.9 The lands within this representation have previously been considered by the PAC, as part of the Public Local Inquiry into BMAP 2015. In relation to Objection 3059 it was considered that, "*this site may represent an ideal opportunity to round-off the settlement limit. There is access available from adjoining Willow Lodge. This site could accommodate 60 dwellings and would constitute rounding-off of the limit. We consider that the existing boundaries of the site to the north and west could be retained and supplemented as part of the development management process.*"
- 5.10 We would agree with this and support the consolidation of development to the built urban form of Villages, so that development is facilitated in a sustainable pattern. Given such, these lands adjacent to the current development limit represent substantial opportunity for compact growth

of the Village, representing a clear rounding-off opportunity for Maghaberry. An indicative development limit has been identified at **Annex 4**, inclusive of our clients lands.

5.11 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 zoned for residential development, our client is committed to bring these forward within the plan period. These lands have been previously identified at the BMAP Local Inquiry as the most appropriate lands for compact expansion of the Maghaberry.

5.12 As such, these lands are *available* and would assist in *delivering* the minimum housing growth figure. An indicative Site Concept has been included at **Annex 5**, demonstrating the lands capacity to accommodate residential development which integrates in terms of density and overall layout to those adjacent developments. Our client has a demonstrated record of successfully delivering housing throughout the Borough and specifically within Maghaberry, responsible for c.130no. homes at Copperfield Court and Willow Lodge.

## **6.0 Conclusions**

6.1 In conclusion, 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.

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. 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 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.

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 extension to the Village of Maghaberry.

**ANNEX 1**

TSA Housing Allocation Table – 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
<b>City</b>									
Lisburn	45,410	18,415	100	4728					4728
<b>Greater Urban Areas</b>									
Lisburn GUA		1,979	13.87	461					461
Castlereagh GUA		12,287	86.13	3113					3113
<b>Total</b>		<b>14,266</b>	<b>100</b>	<b>3574</b>					<b>3574</b>
<b>Towns</b>									
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
<b>Total</b>		<b>6040</b>		<b>1614</b>		<b>1787.45</b>		<b>1613.95</b>	<b>1614</b>
<b>Villages</b>									
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
<b>Total</b>		<b>4965</b>		<b>1384</b>		<b>1353.49</b>			<b>1384</b>

**ANNEX 2**

**Maghaberry – Site Location Plan**



NOTED DIMENSIONS TO BE FOLLOWED IN PREFERENCE TO SCALED DIMENSIONS AND REPORT ANY DISCREPANCY IMMEDIATELY!

THE INFORMATION PROVIDED ON THIS DRAWING IN RESPECT OF STATIONING OR OTHER EARTHWORK SERVICE INFORMATION CANNOT BE GUARANTEED TO BE ACCURATE, IS GIVEN FOR ASSISTANCE AND GENERAL GUIDANCE, AND THAT ROUTES MAY DEVIATE ALTHOUGH PATTERSON DESIGN THEREFORE CAN TAKE NO RESPONSIBILITY FOR THE INFORMATION PROVIDED AND DOES NOT WARRANT ACCURACY OF THE SAME.

REVISIONS	BY	DATE
REV DESCRIPTION		

- PLANNING
- BUILDING CONTROL
- RECORD
- FOR APPROVAL

PROJECT  
Location plan

DRAWING TITLE  
Moghghberry

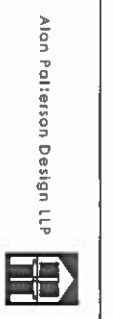
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SITE AREA

DATE  
20-01-20

DRAWN BY  
AH

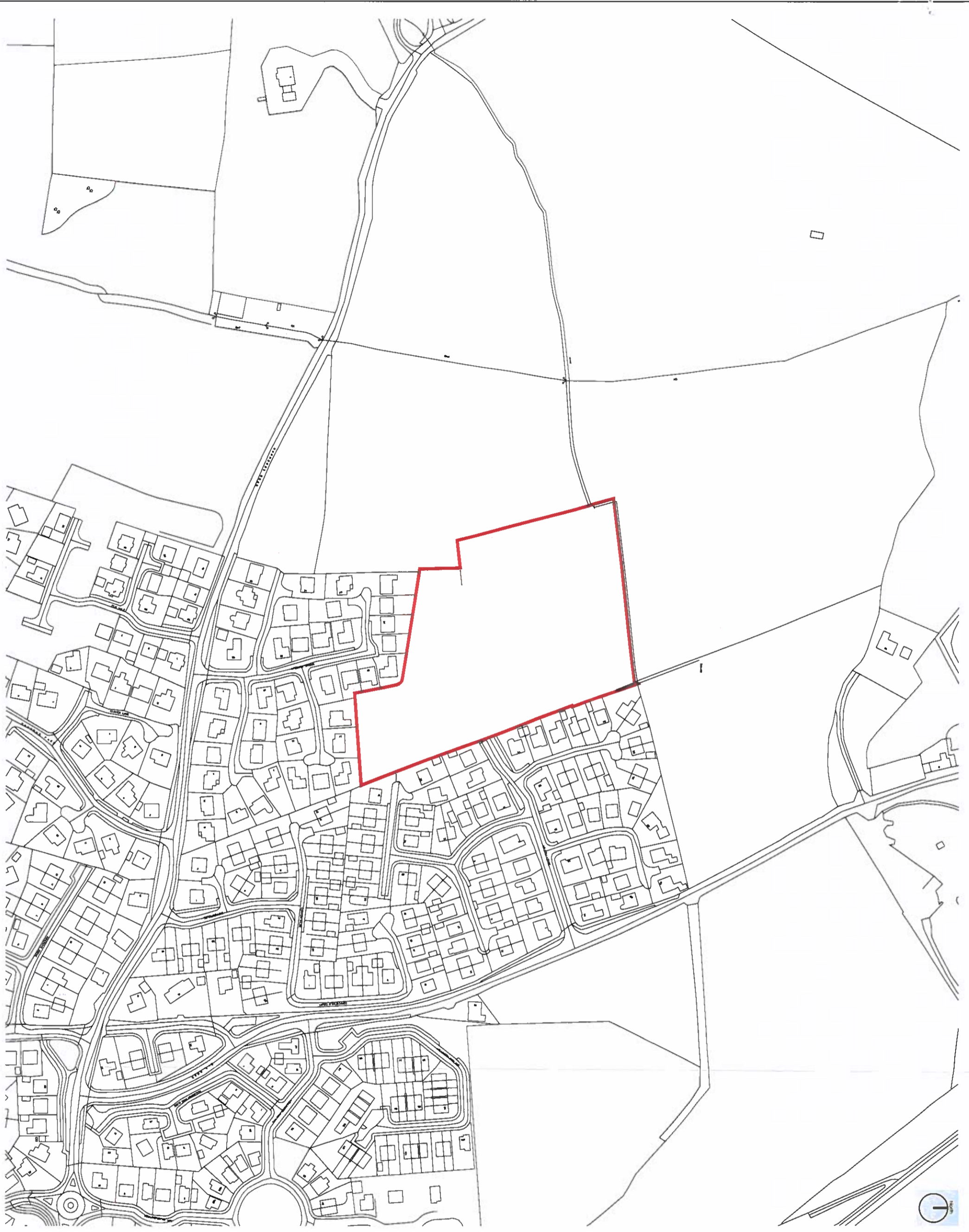
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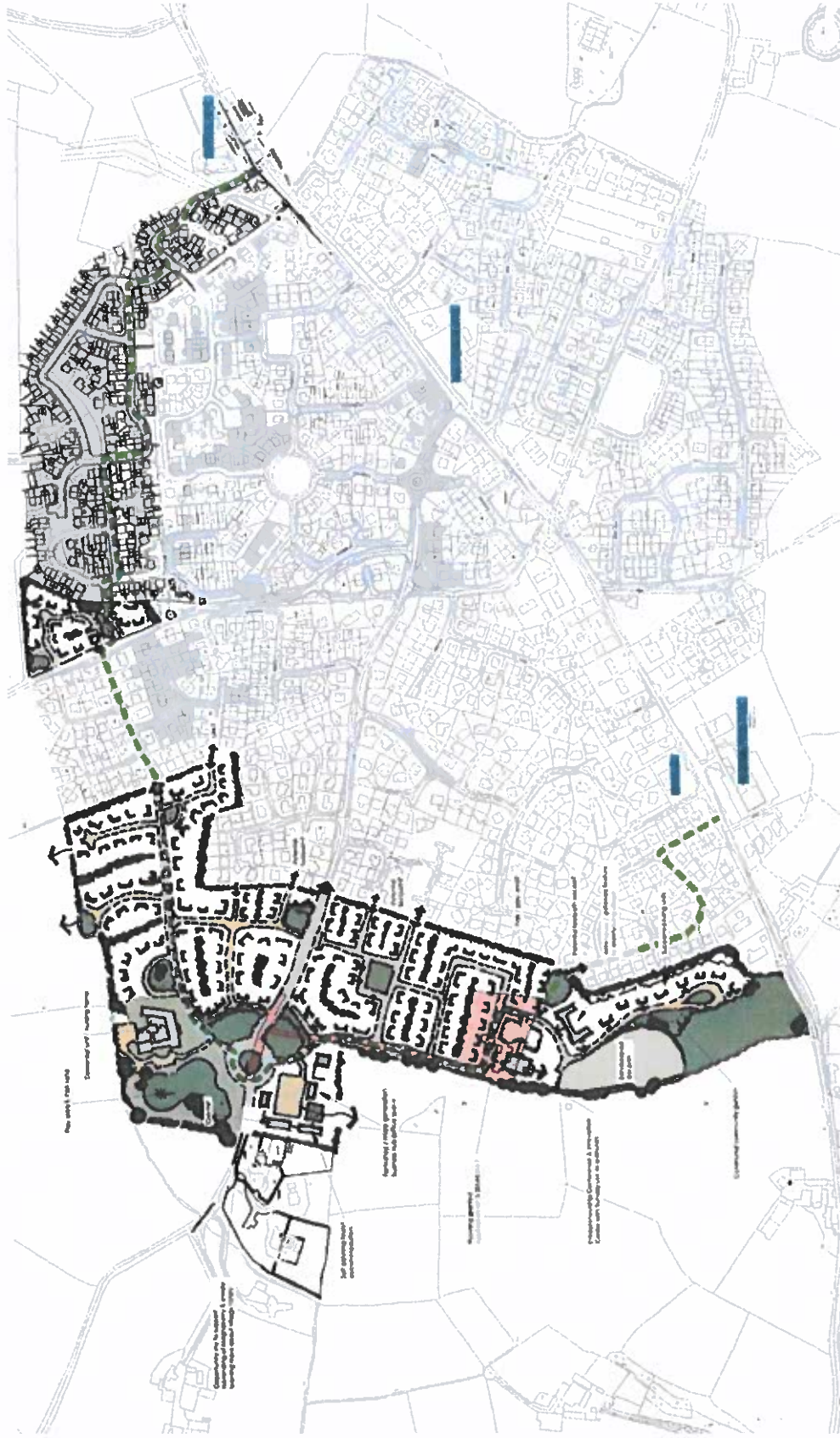
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**ANNEX 3**  
POP Response Lands

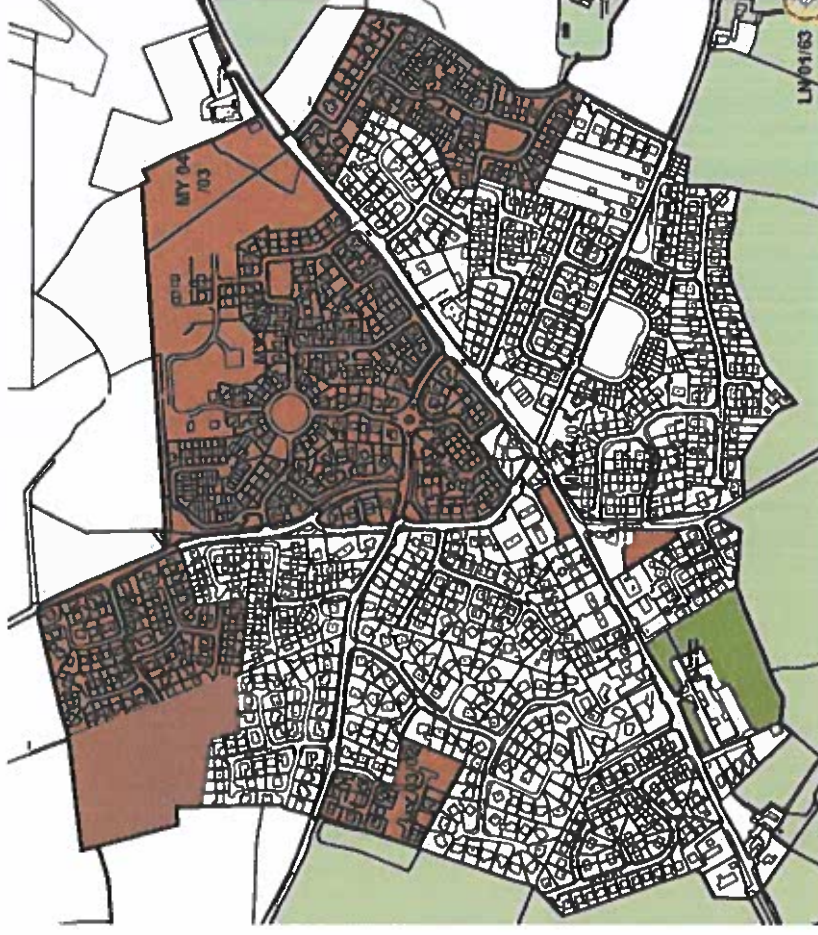


**ANNEX 4**

**Maghaberry Indicative Settlement Development Limit**



## Existing Development Limit



## Proposed Development Limit

**ANNEX 5**  
Concept Site Layout



PROPOSED ALTERNATIVE ILLUSTRATIVE LAYOUT



Proposed development for

Lands at Maghberry

June 2016

F4325-050-03-001-001

1:1250 APPROX

: ILLUSTRATIVE PROPOSALS



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