



Our ref: NI 2177 - Downshire Estate

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Local Development Plan Team
Lisburn & Castlereagh City Council
Civic Headquarters
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Dear Sir/madam,

Lisburn & Castlereagh City Council Local Development Plan 2032 – Draft Plan Strategy

I refer to the draft Plan Strategy published for formal consultation on 8th November 2019. RPS has been appointed to review and comment on the draft Strategy on behalf of the Downshire Estate. We have reviewed the documents in the context of the planning advice provided by the Department for Infrastructure and in particular the guidance provided by Development Plan Practice Note 6 (DPPN6) – Soundness.

Our primary concerns in respect of the soundness of the draft Plan Strategy relates to the Consistency tests and the Coherence & Effectiveness tests as outlined in DPPN6 as summarised in Appendix A of the draft Strategy.

In respect of housing development, the draft Plan Strategy in Part 1, Chapter 4 states that:

“The findings of both the Housing Growth Study and Urban Capacity Study indicate that given the extent of the existing settlement limits (which were zoned through the previous Development Plan) sufficient land remains for housing to be delivered across the Council area within settlements whilst allowing for additional strategic housing growth at West Lisburn/Blaris to support the projected economic growth (see SMU01 West Lisburn/Blaris). The Strategic Housing Allocation presented in Table 3 negates the need to provide any greenfield extension to allow for future housing growth.”

Further the draft Strategy relies upon a Landscape Character Assessment Review (Appendix 1 to Technical Supplement 6 – Countryside Assessment) which, in its Settlement Assessment, concludes that any development south of Monument Road and east of Old Coach Road “would intrude into more open, exposed parts of the rural landscape.” This conclusion is incorrect.

Downshire Estate holds lands either side of Old Coach Road that are well screened from any public viewpoints by the topography and intervening development. It is our considered view that some of these lands as outlined in red on the attached plan (Appendix 1) should be included within the settlement limit for Hillsborough. The inclusion of the subject lands would enhance the soundness of the plan by providing an opportunity for a sensitive exemplar development, modest in scale and in keeping with the character of the adjoining town centre and Conservation Area. The lands are within 350m of the town centre and their sensitive development would facilitate genuinely sustainable development that is in accordance with the Plan vision and objectives and with other extant plans, policies and strategies.

The Downshire Estate are not speculative developers. The Estate have no pre-conceived plans for the subject lands other than to provide an exemplar project following the principles established by the Princes Foundation

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as espoused in a number of policy documents issued by the Foundation including 'Housing Britain' where the emphasis is placed on integrating healthy living with good design and accessibility to town centre services as espoused in the foreword by the Prince:

"I have long believed that for communities to prosper they require a built environment that provides good quality homes that are planned as walkable, mixed-use and mixed-income neighbourhoods, with integrated affordable housing that is as well designed as the rest. They also need a range of local services accessible by public transport, green routes and natural places that are enjoyable and safe for cycling and, above all, with a local identity that fosters pride and a sense of belonging, and has character and beauty. The most successful and popular neighbourhoods have most, if not all, of these qualities and unquestionably help in improving the quality of people's lives, social cohesion and well-being."

The Foundation publication 'Building a Legacy' emphasises the importance of meaningful community engagement in developing projects appropriate to the local context, steering away from isolated housing development on urban fringes under the heading of 'More Resilient Communities':

"The late 20th century's trend for suburban housing has led to greater negative impacts on infrastructure and energy costs, as well as carbon emissions from car travel, and contributing to higher levels of obesity from driving rather than walking. These impacts have rarely been associated with costs to the public purse, but as public spending decreases and public awareness of these issues grows, then trends and aspirations in housing can quickly change. The suburban dream of the 1960s is rapidly being replaced with a return to urban living and a desire for more efficient and sociable lifestyles. Building good places can therefore promote healthy communities, sustainable lifestyles and resilience to mitigate against the future effects of energy costs and climate change. The flexibility and mix of housing types and employment uses is also more resilient to changing economic conditions and can adapt to changing circumstances in a way that standard housing estates and zoned development cannot....."

.....An essential part of the planning process is getting local communities, local councillors and local planners all on board. This is best achieved through engaging in a community planning process like Enquiry by Design, or holding design charrettes. These are well-managed, inclusive design processes where design options are tested by being drawn, with local stakeholders invited to take part at dedicated times during the process. If these processes are well run, this is more likely to lead to a feeling of trust and commitment to certain key principles, and is very useful for the design team in terms of listening to any concerns and understanding what matters most to local people. To ensure that the trust built up extends into delivery, it is important to have control over the developer so that what has been agreed with the local community actually gets built."

The Downshire Estate is committed to an Enquiry by Design process to ensure that the final development proposal on the subject lands is a genuinely exemplar project that meets needs and aspirations of the local community, identified by the community through a meaningful consultation process.

In contrast to the subject lands, the reliance by the draft Plan Strategy on existing settlement limits means a reliance on new housing on the fringes of the settlement at some distance from the town centre where it is not possible to deliver a genuinely sustainable development that is successfully integrated with the town centre, existing community, service, entertainment and tourist facilities. By their nature those developments will rely on high private car usage and potential increase social isolation which is at odds with established principles in respect of sustainable development and travel.

While we appreciate the Council position in respect of retaining development zonings where the development is already committed, the exclusion of the Downshire Estate subject lands from the settlement limits means that there is a failure to properly deliver sustainable outcomes that integrate appropriate housing provision with community facilities, the existing town centre, significant tourist project/assets and future further planned investment by the Council and other providers. It would render the draft Plan Strategy deficient in terms of compliance with the established tests for soundness.

CONSISTENCY

C2 – Did the Council Take Account of the Community Plan?

The Local Development Plan (LDP) should be the 'spatial representation' of the Community Plan (CP) contributing to the CP outcomes through physical development. The Community Plan states that the LDP will be "moving away from a narrow land-use focus towards a 'place-shaping' approach".

In its baseline assessment of the borough, the Community Plan provides important context for the development of the LDP:

- Lisburn & Castlereagh's population is projected to grow by almost twice the rate of growth expected for the region as a whole and much of that growth will be concentrated in the 65+ age group: 28% by 2025 and 50% by 2030 (53% by 2032).
- Use of public transport by residents is below the NI average and 86% of households had access to one or more cars, compared to 78% in NI.
- There was strong emphasis on the importance of green spaces, good play facilities and sport for both physical and mental health. Opportunities to be involved in arts and culture are important for well-being. People want to see a 'joined-up' approach to health with a focus on community health.
- Local identity is important. People identify strongly with the towns, villages and neighbourhoods they live in rather than the Council area as a whole. For communities to have cohesion they need local shops and social facilities for people to meet. There also needs to be affordable housing. The concept of a 'Community Hub' based in local schools was a popular one – using the school facilities for the wider community as centres for health, adult education, childcare, training opportunities, social connection and volunteering.

The CP sets out a number of key themes addressing the challenges and opportunities in the Borough and the LDP draft Strategy at Appendix C seeks to set out how the Strategy has taken account of the CP. It is our considered view that the LDP draft Strategy fails to take proper account of the Community Plan. In particular it fails in providing for the delivery of the following CP Themes and associated outcomes:

Theme 3: Health & Well-being

- ***Supporting Outcome 3C: People of all ages are more physically active more often.***
- ***Supporting Outcome 3D: There is good access to countryside and other green space for everyone.***

Theme 4: Where We Live

- ***Supporting Outcome 4B: Neighbourhoods are designed and regenerated to promote well-being.***
- ***Supporting Outcome 4D: We have access to essential services, shops, leisure and workplaces.***
- ***Supporting Outcome 4E: There is a modal shift to sustainable and healthy transport options.***

Theme 5: Our Community

- ***Supporting Outcome 5D: We feel a sense of belonging in our local neighbourhoods: urban, suburban and rural.***

Despite the assertion that Plan Objectives deliver on these CP outcomes the draft Plan Strategy only pays lip service to these objectives because it is hamstrung by the reliance on new housing development far removed from the town centre and the associated services. In the context of planning for sustainable development and an increasing ageing population there will be a requirement for the integration (joined-up approach) of appropriately designed housing provision with opportunities for physical activity, access to the countryside and other green space, access to community facilities, shops, leisure and entertainment within developments or close to them where they can be accessed by walking or cycling. An increasingly ageing population is at risk of social isolation and increased dependence on private cars within larger housing developments on the outskirts of the town.

Our proposed inclusion of the subject lands within the development limits offers the opportunity to deliver an integrated exemplar development that is genuinely connected to the town centre and key services as well as

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opening up further opportunities for walking and cycling, accessing historic features and green areas within and adjacent to the development. The inclusion of these lands would enhance consistency with the Community Plan.

C3 – Did the Council Take Account of Policy & Guidance issued by the Department?

It is our position that the draft Plan Strategy and associated operational policies (Part 2) are inconsistent with the Strategic Planning Policy Statement and numerous existing policies and strategies that the Council must take into account in the preparation of the Local Development Plan (LDP). Further we argue that the approach is also inconsistent with the overall vision and objectives of the LDP and the associated operational policies. The draft Plan Strategy therefore is unsound in respect of the consistency, coherence and effectiveness tests as outlined in DPPN6.

The starting point of our assessment of the draft Plan Strategy is the purpose of the planning system as summarised in the Strategic Planning Policy Statement (SPPS). The SPPS states that, consistent with Part 1, Section 1 of the Planning Act (Northern Ireland) 2011 ('The 2011 Act'), is to:

"...secure the orderly and consistent development of land whilst furthering sustainable development and improving well-being. This means the planning system should positively and proactively facilitate development that contributes to a more socially, economically and environmentally sustainable Northern Ireland."

For the reasons outlined above in respect of consistency with the Community Plan, the draft Plan Strategy also fails to properly provide for sustainable development and is therefore inconsistent with the SPPS.

Specifically the approach adopted in the draft Plan Strategy fails to reflect the SPPS policies in respect of the integration of open space within new developments and ensuring that new open space and sporting facilities are convenient and accessible to all sections of society. The subject lands we propose for inclusion will deliver on those considerations.

C4 - Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

Under their Hillsborough Tourism Masterplan, the Council plan to develop the forest park into a first class, innovative and natural recreational area for residents and visitors. The newly developed family attraction will be enjoyed by people of all ages and will create health opportunities for local residents and visitors by improving access to physical recreation within the forest. While the Plan Strategy references the Masterplan and the Council's 2018 Tourist Strategy, the failure to include lands adjoining the forest park within the settlement limits restricts the opportunities for access to the forest park and fails to maximise the level of integration between potential town centre/edge of town centre residents and the tourist infrastructure and associated recreational activities. Inclusion of the subject lands would open up opportunities for vehicular access directly from the A1, avoiding any need for traffic to go through the village centre which would add to the existing congestion problems. Omission of the subject lands would also fail to capitalise on the significant tourism investment by Historic Royal Palaces which has resulted in very significant visitor numbers to the town. The integration of the HRP project in the Castle and Gardens with the Council's own proposals for the forest park and a sympathetic and appropriate mix of development on the subject lands would provide enhanced potential for looped walks through from the castle grounds, through the forest park and linked by appropriate open space to the monument on Old Coach Road.

COHERENCE & EFFECTIVENESS

CE1 - The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils.

The Council Plan Strategy should clearly set out a coherent strategy to deliver aims and objectives for its area in the DPD. The strategy should be ambitious but realistic setting out the long term vision for a council area and should reflect the challenges that a council area faces and incorporate the aims and objectives of its agreed community plan.

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For the reasons set out above in respect of lack of consistency with the Community Plan and the challenges identified it is our considered view that the Plan Strategy does not provide a coherent response to those challenges.

The Spatial Strategy recognises that the towns in the borough “provide an important role within the hierarchy which, in addition to jobs and services, has a strong community focus, including health, education, leisure and recreation. Encouraging consolidation of these urban settlements prevents the need for urban sprawl, and provides opportunity for infrastructure improvements where it is most needed.” (my emphasis).

The reliance on only the existing land zonings at some distance from the town centre of Hillsborough is at odds with this objective. Delivery of consolidation of development in Hillsborough requires the Strategy to go beyond the basic statistics in respect of housing need and building in flexibility where appropriate development that delivers consolidation and integration of living with the required services, healthy living options and sustainable transport can be accommodated on sites close to the town centre would deliver enhanced 'soundness' to the Plan Strategy.

There are numerous policies in the Operational Policy Section of the LDP documents that are also at odds with the approach not to entertain further suitably located lands being included in the development limit. These include:

- **HOU1 – New Residential development.** Under this policy the Council seeks to encourage residential development within the city and town centres as it recognises such schemes can contribute to regeneration and vitality and viability. Centrally located housing is environmentally sustainable, utilises existing infrastructure, and encourages walking, cycling and use of public transport, contributing to active travel. Residential use can revitalise the physical fabric of centres by re-use of vacant buildings and the redevelopment of derelict lands within centres. The centre of Hillsborough is a designated Conservation Area and there is therefore limited potential for any significant further housing provision within the town centre. Indeed in this instance any such proposal in Hillsborough is likely to fail on proposed Policy HOU8 - **Protecting Local Character, Environmental Quality and Residential Amenity in Established Residential Areas.** This is further evidence of the Strategy lacking coherence and it is clear that reliance only on the existing housing areas within the settlement limits will fail to meet the objectives of Policy HOU1.
- **HOU3 - Site Context and Characteristics of New Residential Development.** Under policy HOU3, the Council seeks to secure attractive and sustainable residential development with a high quality of design, layout and landscaping. Place shaping comes from achieving a balanced response to all the factors influencing a scheme, including the creation of landmarks, public spaces and the use of public art, encouraging pedestrian and cycle movements, makes provision for increased use of public transport, promotes biodiversity and encourages wildlife, integrates open space and, where necessary accommodates local neighbourhood facilities. It is important that the concept is based on a network of spaces rather than a hierarchy of roads to ensure the creation of surroundings with an attractive human scale and a distinctive overall sense of place. The omission of the subject lands, located close to the town centre, to numerous historic and landmark features all of which encourage integration of all of the factors referenced in the Councils objectives demonstrates lack of coherence between individual operation policies and the overall strategy.
- In that context the omission of the subject lands is at odds with the LDP Strategy stated objectives of delivering **Quality Places, Thriving Places, Vibrant Places, Attractive Places, Green Places and Connected Places.** Following on that strand the Plan Strategy the laudable objectives of the strategic policies **SP01 – Sustainable Development, SP03 – Shared Spaces and Quality Places, SP15 Night-time Economy, SP16 – Tourism, and SP17 – Open Space Sport & Recreation** are all compromised by the failure to consider inclusion of suitably located sites close to the town centre.

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

The draft Plan Strategy relies on a flawed analysis of the of the setting of Hillsborough and the capacity for development of the subject lands south of Dromore Road as outlined above. The Settlement Appraisal is therefore unreliable and does not form a robust evidence base for the draft Strategy.

In addition the draft Plan Strategy seeks to rely only on existing zoned and committed sites to deliver the housing need for the borough generally and Hillsborough. That position is based on the identified housing

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numbers predicted and applies a 'typical' annual build rate and average density to calculate the land requirements to meet that need.

The design criteria outlined in **HOU4 – Design in New Residential Developments** aspires to new housing standards which exceed the current NI Building Control Regulations. This policy seeks to promote housing with improved accessibility and inclusivity and is required to improve energy performance of dwellings.

These include:

- e) a range of dwellings should be proposed that are accessible and adaptable in their design to provide an appropriate standard of access for all. The design of dwellings should ensure they are capable of adaption to provide accommodation that is wheelchair useable for those in society who are mobility impaired. A range of dwelling types and designs should be provided to prevent members of society from becoming socially excluded.**

This aspiration is in line with the current recognised standard of Lifetime Homes and does not appear to be compatible with assumed per hectare development densities used to calculate the land required to meet the dwelling numbers identified in the Plan analysis. Lifetime Homes outlines minimum space standards and has aspirations for increased space standards to house design to create flexible and cost-effective house designs.

- f) dwellings should be designed to be energy and resource efficient and, where practical should include integrated renewable energy technologies to minimise their impact on the environment**

The Nearly Zero- Energy Requirements for New Buildings, under amendment Regulation 43B NI Building Regulations is effective from 31st December 2020. Additional site area will be required for the inclusion of micro renewables and to facilitate greater building footprints due to super-insulating in order to meet these new energy performance targets and the aspirations within the plan.

It is apparent therefore, that lower density developments would be required to achieve these aspirational housing standards and in our recent experience, planning permissions granted in this area are typically below the proposed density bands outlined in HOU4 section d).

Therefore the housing densities used to calculate land needs and anticipated to be delivered through the LDP process are unrealistic and further land will be required to meet housing targets.²

The draft LDP Plan Strategy is therefore unsound in that in the Council has not considered relevant matters in drafting the Plan Strategy. The draft Strategy is therefore not realistic or appropriate has not considered the relevant alternatives and is not founded on a robust evidence base

CE4 - It is reasonably flexible to enable it to deal with changing circumstances.

It is our considered view that the draft Plan Strategy is unsound in that it fails to build in sufficient flexibility to deal with changing circumstances. The Community Plan and the technical supplements to this Plan identify major issues in respect of a rapidly ageing population and the drive to deliver genuinely sustainable development that responds to identified local needs. The Downshire Estate is interested in delivering a genuinely sustainable project on the subject lands. The final development mix will be determined by the local community through the Enquiry by Design process. It will follow the principles of the Princes Foundation in the integration of healthy living through real connection to local community - promoting healthy communities, sustainable lifestyles and resilience to mitigate against the future effects of energy costs and climate change. It will provide flexibility and mix of housing types and employment/community uses. It will encourage sustainable travel and real connections with the town centre, will be more resilient to changing economic conditions and adaptable to changing circumstances in a way that standard housing estates and zoned development cannot.

In that context the draft Plan Strategy does not build in sufficient flexibility to deal with the existing challenges already identified in the Community Plan, its own vision and objectives and changing circumstances. It does not provide a coherent and effective strategy.

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Conclusions

We respectfully say that the sole reliance on existing zonings and existing settlement limits at Hillsborough as currently drafted renders the draft Plan Strategy unsound for the reasons detailed above. It should be amended to provide for increased flexibility in respect of potential development sites close to the town centre that can deliver on the SPPS, Community Plan and draft Plan Strategy objectives for sustainable development and ensure that the coherence of the overall Plan Strategy and associated policies is not compromised.

I can confirm that the Downshire Estate wish to be represented at the hearing as part of the Independent Examination of the draft Plan Strategy in respect of the issues raised in this submission.

Yours sincerely,
for RPS Group Limited

Director - Planning

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APPENDIX ONE – SITE LOCATION PLAN

MONUMENT PARK - Hillsborough -



- KEY**
- Open Space
 - Hillsborough Conservation Area
 - Protected Route A1
 - Road
 - Existing Pedestrian Route
 - Viewpoint for Visual Link from village

Note: The information provided on this drawing is based on limited information and remains subject to Planning permission and all other statutory approvals

SITE ANALYSIS

DT/16/04/16/04/02
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Hillier Partnership Group LLP