

**Local Development Plan 2032
Draft Plan Strategy
Consultation on Focussed Changes
Addendum including Minor Changes
Schedule
January 2021**

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1.0 Background

- 1.1 Lisburn & Castlereagh City Council is responsible for the preparation of its Local Development Plan. This consists of a two stage process, commencing with publication and consultation on the draft Plan Strategy, and following its adoption, the Local Policies Plan. Together these will constitute the Council's new Local Development Plan (LDP).
- 1.2 The draft Plan Strategy was published for public consultation with a pre-consultation period which ran from Friday 11th October to Thursday 7th November 2019; and formal consultation commencing on Friday 8th November 2019 for an extended nine week period up to Friday 10th January 2020.
- 1.3 The Council received 128 representations during this consultation process. Regulation 20(2)(g) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, requires the Council to prepare a statement outlining the number and summary of main issues raised in relation to representations received to the draft Plan Strategy, submitted in accordance with regulation 16(2) of the LDP regulations.
- 1.4 The Council has prepared a Public Consultation Report (PCR) which takes account of the main issues raised and this will be published on submission of all documents to the Department for Infrastructure in order to cause an Independent Examination.
- 1.5 After due consideration of all representations received, the Council is proposing a number of changes to the published draft Plan Strategy. This takes full account of Development Plan Practice Note 10 'Submitting Development Plan Documents for Independent Examination (DPPN 10) December 2019 which outlines the administrative procedures for any proposed change to the draft Plan Strategy.
- 1.6 The purpose of this consultation is to bring to the attention of the general public, consultation bodies and any other interested parties the proposed changes that the Council intends to make to the published draft Plan Strategy.
- 1.7 Paragraph 4.3 of DPPN 10 states *"Following receipt of representations to the DPD, the council will consider the issues raised...and determine whether there will be:*
- **NO CHANGE** - *Determines that the DPD as prepared is sound and does not need to be changed.*
 - **MINOR CHANGES** - *Notes the issues and whilst determines that the DPD as prepared is sound, proposes minor changes that could be acceptable, which would not impact upon the soundness of the DPD.*
 - **FOCUSSED CHANGES** - *Identifies that an unforeseen issue has arisen and considers that changes are required to ensure that any impact upon the soundness of the DPD is addressed.*
 - **FUNDAMENTAL CHANGES** - *Agrees that an issue is fundamental and goes to the heart of the DPD and withdraws the DPD."*
- 1.8 The Council has identified the need to make both focussed and minor changes to its draft Plan Strategy.
- 1.9 The focussed changes are presented in the form of a 'Focussed Change' Addendum as indicated in paragraph 4.7 of DPPN 10 and the public consultation process follows the guidance set out at paragraph 4.10 of DPPN 10. All other statutory assessments, including a Sustainability Appraisal (SA) Addendum, a Habitats Regulations Assessment (HRA) Addendum, an Equality Impact Addendum and a Rural Needs Impact Addendum are also published as required.
- 1.10 Minor changes are provided as a separate schedule in accordance with paragraph 4.5 of DPPN 10. Whilst this states that *"Necessary minor editing changes for factual correction do*

not require public consultation” the Council is publishing the schedule for information and to allow the reader to understand how the Council differentiated between what it considered to be a minor and focussed change.

- 1.11** Any comments made on focussed changes **can only** address and relate to the soundness of proposed focussed changes as outlined at paragraph 4.10 of DPPN 10. This consultation **is not** an opportunity to add to the previous representations or to make new comments on parts of the original draft Plan Strategy.
- 1.12** Any proposed focussed changes are published without prejudice to the Examiner’s final recommendations following consideration of issues through the Independent Examination (IE).
- 1.13** It is important to note that it is the Department for Infrastructure that determine if any amendments recommended as a result of the IE report should be incorporated into the final Plan Strategy.

2.0 Consultation Period and Process

- 2.1** The consultation period will run for a period of eight weeks from **9am on Thursday 14th January 2021 to 5pm on Friday 12th March 2021**. Please note comments received after the closing date will not be considered.
- 2.2** The Council will publish comments to focussed changes as soon as reasonably practicable after the expiry of the consultation period. It should be noted that any comments received will be made available for public inspection and placed on the Council’s website after the consultation period has closed.
- 2.3** Comments received on the focussed changes will be collated and submitted as part of the Council’s submission to the Department. All personal contact details will remain confidential (please refer to the Council’s privacy notice for further information). All comments will be supplied to the Department for Infrastructure and the examining body as part of the Independent Examination process.
- 2.4** You can make comment on the focussed changes in the following ways:

By email: LDP@lisburncastlereagh.gov.uk

Write to us at:

Local Development Plan Team

Civic Headquarters

Lagan Valley Island

Lisburn

BT27 4RL

Appendix A Focussed Changes Addendum

PART ONE PLAN STRATEGY				
Focussed Change Reference	Chapter/Policy of draft Plan Strategy	Proposed Focussed Change	Reason	Justification (assessed against DPPN 10)
A: A QUALITY PLACE – ENABLING SUSTAINABLE COMMUNITIES AND DELIVERY OF NEW HOMES				
FC1A	SP08 Housing in Settlements	<p>The Council has considered the figures for affordable housing need and acknowledges that an error has occurred. The Council proposes for clarity, as a focussed change, to amend this figure as follows:</p> <p><u>Page 28</u>: “Extrapolating this figure over the Plan period from 2017-2032 equates to an estimated figure of approximately 2,400 <i>social housing dwelling</i> units. An additional need is also indicated for intermediate housing which equates to an additional projected need for 3,840 <i>1,920</i> units over the Plan period.”</p> <p><u>Page 61</u>: “The total affordable housing requirement for the Plan period is 6,240 <i>4,320</i> units of which 2,400 are social housing units.”</p>	In response to NIHE (DPS-012) and Turleys on behalf of NIFHA (DPS-032); Clanmil Housing Association (DPS-048); Plantation Landowners Group; two individuals; JH Price and Sons; Lagan Homes Ltd; Viewpoint Developments Ltd; Chambers Homes Ltd; Turley; and Glengard Farm questioning the Housing Needs Assessment of 6,240 affordable units required over the Plan period	Does not impact upon the soundness of the Plan – whilst this is a focussed change to the supporting text of the Strategic Housing Allocation, it does not affect Strategic Policy 08 and it is necessary for clarification
FC1B	SP08 Housing in Settlements	The Council proposes for clarity, as a focussed change, to amend Table 3 of the draft Plan Strategy (dPS) page 64, and relating text on pages 58-63 under the Strategic Housing Allocation, to reflect the most up-to-date HGI data provided at time of publication of the draft Plan Strategy. A minor adjustment (equivalent to 3% of the HGI figure) was made to reflect the mid-point between the two employment-led scenarios that were included in the Housing Growth Study (as updated). An Addendum to Technical Supplement 1 Housing Growth Study has also been provided to reflect the HGI update.	In response to a number of representations relating to the updated HGI figures published in September 2019	The Council has identified that the HGI update (provided at time of publication of the draft Plan Strategy) is an unforeseen issue and considers that changes are required to ensure that any impact upon

		<i>See Annex 1 for amended Table 3 (page 64) and relating text (pages 58-63, Part 1) and Addendum to Technical Supplement 1.</i>		the soundness of the DPD is addressed
B: A THRIVING PLACE – DRIVING SUSTAINABLE ECONOMIC GROWTH				
n/a				
C: A VIBRANT PLACE – GROWING OUR CITY, TOWN CENTRES, RETAILING AND OTHER USES				
FC2	SP14 Town Centres, Retailing and Other Uses	The Council proposes for clarity, as a focussed change, to remove criteria b) from Strategic Policy 14, page 96, as follows: <i>“b) support Sprucefield Regional Shopping Centre in recognition of its regional status in accordance with key site requirements.”</i>	In response to representations from Belfast City Council (DPS-041) and Fleming Mounstephen Planning on behalf of Central Craigavon Ltd (DPS-061) suggestions that SP14 stance is incompatible and contradictory in seeking to promote retailing and other uses in City/Town Centres	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, as Sprucefield Regional Shopping Centre is dealt with under its own policy SMU03, it is necessary for clarification
D: AN ATTRACTIVE PLACE – PROMOTING SUSTAINABLE TOURISM, OPEN SPACE, SPORT AND OUTDOOR RECREATION				
n/a				
E: A GREEN PLACE – PROTECTING AND ENHANCING THE HISTORIC AND NATURAL ENVIRONMENT				
n/a				
F: A CONNECTED PLACE – SUPPORTING SUSTAINABLE TRANSPORT AND OTHER INFRASTRUCTURE				
FC3	SP21 Renewable Energy	The Council proposes for clarity, as a focussed change, to amend paragraph 3 of the J&A, page 146, as follows: <i>“A precautionary cautious approach for renewable energy development proposals will apply within designated landscapes which are of significant value, such as Areas of Outstanding Natural Beauty and their wider settings. In such sensitive landscapes, it may also be difficult to accommodate renewable energy proposals, including wind turbines, without detriment to the region’s cultural and natural heritage assets.”</i>	In response to representation from RSPB NI (DPS-093) noting that SP21 has effectively narrowed the application of the 'cautious approach' advocated by paragraph 6.223 of the SPPS	Does not impact upon the soundness of the Plan – whilst this is a focussed change to J&A, it is considered necessary for clarification
CHAPTER 5 MONITORING AND REVIEW				
n/a				
GLOSSARY				
n/a				

PART TWO OPERATIONAL POLICIES				
Focussed Change Reference	Chapter/Policy of draft Plan Strategy	Proposed Focussed Change	Reason	Justification (Assessed against DPPN10)
A: A QUALITY PLACE – ENABLING SUSTAINABLE COMMUNITIES AND DELIVERY OF NEW HOMES				
FC4	HOU1 New Residential Development	The Council proposes for clarity, as a focussed change, to amend Policy HOU1 criteria b), page 12, as follows: “b) on previously developed land (brownfield sites) <i>or as part of mixed-use development</i> ”	In response to representation from Dfl (DPS-109) asking the Council to consider the relationship between this policy and SMU01 and any other strategic mixed-use zonings	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is necessary for clarification
FC5A	HOU4 Design in New Residential Development	The Council proposes for clarity as, a focussed change, to amend the first paragraph of the J&A of Policy HOU4, page 15, by inclusion of a second sentence, as follows: <i>“This Policy will apply to those alternative uses which are deemed to be acceptable under Policy HOU2.”</i>	In response to representation from Dfl (DPS-109) asking the Council to consider the relationship between HOU2 and HOU4	Does not impact upon the soundness of the Plan – whilst this is a focussed change to J&A, it is considered necessary for clarification
FC5B	HOU4 Design in New Residential Development	The Council proposes for clarity as a focussed change to amend criteria d) of Policy HOU4, page 15, as follows: “d) residential development should be brought forward in line with the following density bands: <ul style="list-style-type: none"> • City Centre boundary 120-160 dwellings per hectare • <i>Settlement Development Limits of the City, TownsCentres and Greater Urban Areas</i> 25-35 dwellings per hectare • <i>Settlement Development Limits of Villages and Small Settlements</i> 20-25 dwellings per hectare” 	In response to representation from a planning agent (DPS-083) regarding clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is considered necessary for clarification
FC6	COU5 Affordable Housing	The Council proposes for clarity, as a focussed change, to amend the last paragraph of Policy COU5, page 34, as follows:	In response to representation from Dfl (DPS-109) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a focussed change to

		“Generally only one group will be permitted in close proximity to any particular settlement in the rural area <i>and should demonstrate that the need cannot be met within the identified settlement.</i> ”		policy, it is considered necessary for clarification
B: A THRIVING PLACE – DRIVING SUSTAINABLE ECONOMIC GROWTH				
FC7	ED7 Retention of Zoned Land and Economic Development	The Council proposes for clarity, as a focussed change, to amend Policy ED7, page 48, as follows: “Unzoned Land in Settlements On unzoned land a development proposal that would result in the loss of an existing Class B2, B3 or B4 use, <i>or land last used for these purposes</i> , will only be permitted where it is demonstrated that:...”	In response to representation from DfI (DPS-109) concerning aligning the policy wording with the SPPS	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is considered necessary for clarification
FC8A	MD1 Environmental Protection	The Council proposes for clarity, as a focussed change, to amend Policy MD1, page 51, as follows: “...Minerals development within or in close proximity to an area that has been designated, or is proposed for designation to protect its landscape, scientific, natural <i>or built</i> heritage significance will not normally be granted permission...”	In response to representation from HED (DPS-030) concerning aligning the policy wording with paragraph 6.152 of the SPPS	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is considered necessary for clarification
FC8B	MD1 Environmental Protection	The Council proposes for clarity, as a focussed change, to amend the last sentence of Policy MD1, page 51, as follows: “Minerals development within or in close proximity to an area that has been designated, or is proposed for designation to protect its landscape, scientific of natural <i>or built</i> heritage significance will not normally be granted permission (with the exception of valuable minerals as set out in policy MD4) where this would prejudice the essential character of the area and the rationale for its designation.”	In response to representation from NIEA (DPS-060) regarding concern over policy wording conflicting with the HRA regulations	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is considered necessary for clarification
C: A VIBRANT PLACE – GROWING OUR CITY, TOWN CENTRES, RETAILING AND OTHER USES				
n/a				
D: AN ATTRACTIVE PLACE – PROMOTING SUSTAINABLE TOURISM, OPEN SPACE, SPORT AND OUTDOOR RECREATION				
n/a				
E: A GREEN PLACE – PROTECTING AND ENHANCING THE HISTORIC AND NATURAL ENVIRONMENT				

FC9	HE6 Change of Use and/or Extensions or Alterations to a Listed Building	The Council proposes for clarity, as a focussed change, to amend the first sentence of Policy HE6, page 77, as follows: “The Council will <i>may</i> permit the change of use...”	In response to representation from HED (DPS-030) and Dfl (DPS-109) concerning clarity of the policy	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is considered necessary for clarification
FC10	HE14 Enabling Development	The Council proposes for clarity, as a focussed change, to amend paragraph 5 of the J&A of HE14, page 84, as follows: “This statement should include <i>a conservation statement or plans and</i> sufficient, detailed financial information as is necessary to allow the Council, and or its consultees to make an informed decision upon the application.”	In response to representation from HED (DPS-030) concerning the clarity of the wording in the J&A	Does not impact upon the soundness of the Plan – whilst this is a focussed change to J&A, it is considered necessary for clarification
F: A CONNECTED PLACE – SUPPORTING SUSTAINABLE TRANSPORT AND OTHER INFRASTRUCTURE				
FC11	TRA1 Creating an Accessible Environment	The Council proposes for clarity, as a focussed change, to amend bullet point c) of Policy TRA1, page 92, as follows: “c) priority pedestrian <i>and cycling</i> movement within and between land uses”	In response to representation from Dfl (DPS-109) regarding insertion of cycling into the policy	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is considered necessary for clarification
FC12	TRA3 Access to Protected Routes	The Council proposes for clarity, as a focussed change, to amend Policy TRA3, under subheading ‘Other Protected Routes – Outside Settlement Limits’ page 94, as follows: “Other Protected Routes – Outside Settlement Limits Planning permission will only be granted for a development proposal involving direct access, or the intensification of the use of an existing access where it is demonstrated that access cannot reasonably be taken from an adjacent minor road in the following circumstances: An exception will apply For a replacement dwelling in accordance with Policy COU3 where the dwelling to be replaced is served by an existing vehicular access onto the protected route;	In response to representation from Dfl (DPS-109) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is considered necessary for clarification

		<i>for a farm dwelling or a dwelling serving an established commercial or industrial enterprise where access cannot be reasonably obtained from an adjacent minor road; and, for other developments which would meet the criteria for development in the countryside, where access cannot be reasonably obtained from an adjacent minor road. In all cases the proposed access must be in compliance with the requirements of Policy TRA2.”</i>		
FC13	RE1 Renewable Energy Development	The Council proposes for clarity, as a focussed change, to insert an additional paragraph of text to Policy RE1, after paragraph 4, page 100, as follows: <i>“Any renewable energy development on active peatland will not be permitted unless there are imperative reasons of overriding public interest as defined under The Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 as amended.”</i>	In response to representation from RSPB NI (DPS-093) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is considered necessary for clarification
FC14A	UT1 Utilities	The Council proposes for clarity, as a focussed change, to amend the first sentence of Policy UT1, page 104, as follows: <i>“To ensure that the visual and environmental impact of utility development is kept to a minimum, the provision of utility services...”</i>	In response to representation NIEA (DPS-060) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is considered necessary for clarification
FC14B	UT1 Utilities	The Council proposes for clarity, as a focussed change, to amend Policy UT1, page 104, as follows: <i>“To ensure that the visual and environmental impact of utility development is kept to a minimum, the provision of utility services such as water, wastewater, electricity and gas to new development proposals should be laid underground where considered feasible and viable. An exception will be permitted for overhead electricity lines and poles serving new development, where underground provision is not feasible or viable.</i>	In response to representation from NIE Networks (DPS-096) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is considered necessary for clarification

		<p><i>Proposals for all overhead electricity lines and associated infrastructure, either regional transmission or local distribution networks, will be subject to the following:</i></p> <ul style="list-style-type: none"> <i>a) pylons, poles and overhead lines should follow natural features of the environment, having regard to designated areas of landscape or townscape sensitivity, to minimise visual intrusion;</i> <i>b) Avoidance of areas of nature conservation, historic environment or archaeological interest, where possible;</i> <i>c) Wirescape should be kept to a minimum;</i> <i>d) Associated infrastructure works should be visually integrated, making use of existing and proposed landscaping;</i> <p><i>(e) Proposed power lines should comply with the 1998 International Commission on Non-Ionizing Radiation Protection (ICNIRP)."</i></p>		
FC15	FLD5 Development in Proximity to Reservoirs	<p>The Council proposes for clarity, as a focussed change, to amend Policy FLD5, page 116, in accordance with the advice issued in June 2019 by DfI Rivers as follows:</p> <p>"New development will only be permitted within the potential flood inundation area of a "controlled reservoir" as shown on the Strategic Flood Maps, if:</p> <ul style="list-style-type: none"> <i>a) it can be demonstrated the applicant can demonstrate that the condition, management and maintenance regime of the reservoir is appropriate to provide sufficient assurance regarding its reservoir safety, so as to enable the development to proceed;or</i> <i>b) where assurance on the condition, management and maintenance regime of the relevant reservoir(s) is not demonstrated, the application is accompanied by a Flood Risk Assessment, or other analysis, which demonstrates: 1 an assessment of the downstream flood risk in the event of: a controlled release of water; an uncontrolled release of water due to reservoir failure; a change in flow paths as a result of the proposed development, and 2. That there are suitable measures to manage</i> 	In response to representation from DfI (DPS-109) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a focussed change to policy, it is considered necessary for clarification

		<p>and mitigate the identified flood risk including details of emergency evacuation procedures assesses the downstream flood risk in the event of an uncontrolled release of water due to reservoir failure as being acceptable to enable the development to proceed.</p> <p>Replacement buildings within the potential flood inundation area downstream of a controlled reservoir must be accompanied by a Flood Risk Assessment.</p> <p>With all development proposals There will be a presumption against development within the potential flood inundation area for proposals that include:</p> <ul style="list-style-type: none"> • essential infrastructure; • storage of hazardous substances; and • bespoke accommodation for vulnerable groups. and for any development located in areas where the Flood Risk Assessment indicates potential for an unacceptable combination of depth and velocity (See Policy FLD1) <p><i>Replacement Building(s):- Where assurance on the condition, management and maintenance regime of the relevant reservoir/s is not demonstrated, planning approval will be granted for the replacement of an existing building(s) within the potential flood inundation area of a controlled reservoir provided it is demonstrated that there is no material increase in the flood risk to the proposed development or elsewhere.”</i></p>		
GLOSSARY				
n/a				

Appendix B Minor Changes Schedule

PART ONE PLAN STRATEGY				
Minor Change Reference	Chapter/Policy of draft Plan Strategy	Proposed Minor Change	Reason	Justification (assessed against DPPN 10)
CHAPTER 3 VISION AND PLAN OBJECTIVES A-F				
MC1	Plan Objective C: A Vibrant Place	The Council proposes for clarity, as a minor change, to amend Plan Objective C, pages 36 and 92, by insertion of the following: <i>"4) Support the role of District and Local Centres in accordance with the retail hierarchy (Figure 5, page 97)."</i> <i>*Renumber remaining three points as 5), 6) and 7)</i>	In response to representation from One2One Planning on behalf of Forestside Acquisitions Ltd (DPS-066) regarding the recognition of the role of District Centres	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
CHAPTER 4 STRATEGIC POLICIES AND SPATIAL STRATEGY				
MC2	SP05 Good Design and Positive Place-Making	The Council proposes for clarity, as a minor change, to amend the J&A of Strategic Policy 05, page 44, final paragraph, end of second sentence as follows: <i>"...and its positive contribution to place-making including deterring crime and promoting personal safety."</i>	In response to representation from DoJ (DPS-009) on designing out crime	Does not impact upon the soundness of the Plan
A: A QUALITY PLACE – ENABLING SUSTAINABLE COMMUNITIES AND DELIVERY OF NEW HOMES				
MC3A	SP08 Housing in Settlements	The Council proposes for clarity, as a minor change, to include the definition of affordable housing within the J&A of Strategic Policy 08, page 57 and also place this in the glossary for Part 1 of the DPS, page 160, as follows: <i>"For the purpose of this Plan Strategy, the current definition of affordable housing accords with the SPPS definition provided in its glossary (page 114)."</i>	In response to representations from NIHE (DPS-012) and Co-Ownership (DPS-031) on the inclusion of the definition of affordable housing within the policy and glossary, acknowledging that it may change in the future	Does not impact upon the soundness of the Plan
MC3B	SP08 Housing in Settlements	The Council proposes for clarity, as a minor change, to amend Table 1 of the dPS, page 49, as follows: <i>See Annex for amended Table 1 to include a percentage for the population residing in the countryside</i>	In response to representation from Clyde Shanks on behalf of individual (DPS-065)	Does not impact upon the soundness of the Plan

B: A THRIVING PLACE – DRIVING SUSTAINABLE ECONOMIC GROWTH				
n/a				
C: A VIBRANT PLACE – GROWING OUR CITY, TOWN CENTRES, RETAILING AND OTHER USES				
MC4	SP14 Town Centres, Retailing and Other Uses	The Council proposes for clarity, as a minor change, to amend criteria b) of Strategic Policy 14, page 96, as follows: <i>“b) support the role of District and Local Centres.”</i>	In response to representations from Dfl (DPS-109); One2One Planning on behalf of Forestside Acquisitions Ltd (DPS-066); Fleming Mounstephen on behalf of Henderson Group (DPS-081) that the DPS and SP14 fail to recognise/promote the District Centre of Forestside	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC5	SMU03 Sprucefield Regional Shopping Centre	The Council has considered the figure for existing floor space and acknowledges that an error has occurred. The Council proposes for clarity, as a minor change, to amend the figure (based on accurate figures presented in Table 4.8 and Table 6.8 of Technical Supplement 5 Retail Capacity Study) in the J&A, page 104, as follows: <i>“Sprucefield has approximately 65,000 44,750 square metres of existing gross external retail floorspace...”</i>	In response to Inaltus Limited on behalf of LCC group (DPS-037) and Limo Properties Ltd (DPS-038) and Belfast City Council (DPS-041) questioning the floorspace requirements	Does not impact upon the soundness of the Plan
D: AN ATTRACTIVE PLACE – PROMOTING SUSTAINABLE TOURISM, OPEN SPACE, SPORT AND OUTDOOR RECREATION				
n/a				
E: A GREEN PLACE – PROTECTING AND ENHANCING THE HISTORIC AND NATURAL ENVIRONMENT				
MC6A	SP18 Protecting and Enhancing the Historic Environment and Archaeological Remains	The Council proposes for clarity, as a minor change, to amend the J&A, page 125, as follows: <i>“Listed Buildings/Scheduled <u>Sites Monuments</u>”</i> and the corresponding footnote 51.	In response to representation from Historic Environment Division, HED (DPS-030) noting the term “scheduled monument” and not “scheduled site” be used for accuracy and consistency	Does not impact upon the soundness of the Plan

MC6B	SP18 Protecting and Enhancing the Historic Environment and Archaeological Remains	The Council proposes for clarity, as a minor change, to amend the J&A, page 125, as follows: “Archaeological remains of regional importance include monuments in State Care, scheduled monuments and Areas of Significant Archaeological Interest (ASAI) <i>Such sites benefit from statutory protection and sites that would merit scheduling. Archaeological remains of local importance include other sites recorded on the Sites and Monuments Record, the Industrial Heritage Record and the Defence Heritage Record.</i> ”	In response to representation from Historic Environment Division, HED (DPS-030) regarding the accuracy of wording of paragraph on archaeological remains	Does not impact upon the soundness of the Plan
MC6C	SP18 Protecting and Enhancing the Historic Environment and Archaeological Remains	The Council proposes for clarity, as a minor change, to amend the J&A, page 125, as follows: “There are <i>presently</i> six areas of Archaeological Potential in Dundonald, Dromara, Hillsborough, Lisburn, Drumbo and Glenavy, <i>which are also afforded protection through this Local Development Plan and more may be identified at Local Policies Stage.</i> ”	In response to representation from Historic Environment Division, HED (DPS-030) that the paragraph on Areas of Archaeological Potential needs flexibility to provide for the inclusion of new sites	Does not impact upon the soundness of the Plan
MC7A	SP19 Protecting and Enhancing Natural Heritage	The Council proposes for clarity, as a minor change, to amend the J&A, page 127, by insertion after the fourth paragraph, as follows: “ <i>The Council, when determining the impacts of a proposed development on international or national designations, will consider the precautionary principle as set out in the Rio Declaration on Environment and Development 1992 that states; Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as reasons for postponing cost effective measures to prevent environmental degradation.</i> ”	In response to representation from RSBP NI (DPS-093) stating that the precautionary principle has not been included in SP19	Does not impact upon the soundness of the Plan
MC7B	SP19 Protecting and Enhancing Natural Heritage	The Council proposes for clarity, as a minor change, to amend the J&A under International Designations, page 127, as follows: “Within the Council area there is one Special Protection Area (SPA) and Ramsar Site at Lough Neagh <i>including the water body of Portmore Lough. All proposals that may affect a European or Ramsar site must meet the requirements of NH1.</i> ”	In response to representation from DAERA SEA Team (DPS-058) regarding proposed mitigation measures set out in the draft Habitats Regulation Assessment Report and RSBP NI (DPS-093) making reference to SPA and Ramsar site, and	Does not impact upon the soundness of the Plan

			importance of including reference to Portmore Lough.	
F: A CONNECTED PLACE – SUPPORTING SUSTAINABLE TRANSPORT AND OTHER INFRASTRUCTURE				
MC8A	SP20 Transportation Infrastructure	The Council proposes for clarity, as a minor change, to amend the J&A, page 141, (under Key Transportation Infrastructure Schemes, last sentence) as follows: <i>“In addition the Local Transport Study will seek to adopt a range of measures to reduce the need for reliance on the private car through the allocation of residential zonings in proximity to services consider the strengths and weaknesses of various modes of transport, including walking, cycling, public transport and roads. This will provide clarity on the transport measures that DfI expect to deliver during the LDP period to 2032 and which will become evident at Local Policies Plan stage.”</i>	In response to representation from DfI Transport NI, Eastern Division (DPS-109) suggesting additional wording to clarify position of Local Transport Study	Does not impact upon the soundness of the Plan
MC8B	SP20 Transportation Infrastructure	The Council proposes for clarity, as a minor change, to amend the J&A, page 141, (under Park & Ride/Park & Share, last sentence paragraph 2) as follows: <i>“The Council recognises the value of the existing Park & Ride sites in supporting a modal shift between private car and public transport usage and supports the proposed schemes at West Lisburn adjacent to the proposed new rail halt; Moira, adjacent to the railway station; and the extension of other the Sprucefield Park & Ride sites which benefits from planning approval providing 132 additional car parking spaces.”</i>	In response to representation from DfI Transport NI, Eastern Division (DPS-109) suggesting the Council may wish to include reference to proposed expansion of Cairnshill P&R site	Does not impact upon the soundness of the Plan
MC8C	SP20 Transportation Infrastructure	The Council proposes for clarity, as a minor change, to amend the J&A, page 143, (under Car Parking, last sentence) as follows: <i>“Areas of parking restraint along with other measures to reduce the impact of car parking across the Council area will require further detailed assessment at the Local Policies Plan stage.”</i>	In response to representation from DfI Transport NI, Eastern Division (DPS-109) suggesting that the Council should consider review of existing areas of parking restraint at LPP	Does not impact upon the soundness of the Plan

MC9A	SP23 Waste Management	The Council proposes for clarity, as a minor change, to amend the J&A, page 154, last paragraph, as follows: <i>"This policy will ensure that Proposals for waste management facilities should avoid or minimise any detrimental effects on people, the environment, and local amenity associated with waste management facilities are avoided or minimised in accordance with operational policy set out in Part 2 of the Plan Strategy."</i>	In response to representation from Whitemountain & District Community Association (DPS-016) suggesting rewording and for consistency between the SPPS (paragraph 6.310, page 111)	Does not impact upon the soundness of the Plan
MC9B	SP23 Waste Management	The Council proposes for clarity, as a minor change, to amend the J&A, page 154, through inclusion of the following sentence to the end of last paragraph, as follows: <i>"In assessing all proposals the Council will be guided by the precautionary approach in accordance with paragraph 6.322 of the SPPS."</i>	In response to representation from RSPB NI (DPS-093) suggesting that paragraph 4 does not go far enough to state application of the 'precautionary principle' on proposals for waste management facilities and for consistency with the SPPS (paragraph 6.322, page 113)	Does not impact upon the soundness of the Plan
MC10	SP24 Flooding	The Council proposes for clarity, as a minor change, to amend the J&A, page 156, fourth paragraph, as follows: <i>"DfI Rivers, within the Department for Infrastructure, an Agency within the Department of Agriculture, Environment and Rural Affairs (DAERA) is the statutory drainage and flood defence authority for Northern Ireland"</i>	In response to representation from DfI (DPS-109) pointing out that responsibility for Rivers has moved from DAERA to DfI	Does not impact upon the soundness of the Plan
CHAPTER 5 MONITORING AND REVIEW				
n/a				
GLOSSARY¹				
MC11A	Glossary	The Council proposes for clarity, as a minor change, to include the definition of National Nature Reserve in the glossary, page 161, as follows: <i>"National Nature Reserve – as defined under the Nature Conservation and Amenity Lands (Northern Ireland) Order 1985."</i>	In response to representation from Whitemountain & District Community Association (DPS-016) asking that the Glossary should	Does not impact upon the soundness of the Plan

¹ See also MC3 re definition of Affordable Housing

			include a definition of a National Nature Reserve	
MC11B	Glossary	<p>The Council proposes for clarity, as a minor change, to include the following definitions in the glossary:</p> <p>Part 1, page 161, Heritage Asset: <i>"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest."</i></p> <p>Part 1, page 161, Listed Building: <i>"A listed building is a structure which the Department for Communities has included in a statutory list of buildings of special architectural and/or historic interest."</i></p> <p>Part 1, page 161, Historic Park, Garden or Demesne of Special Historic Interest: <i>"An identified site of international or regional importance within Northern Ireland, included in the Register of Parks, Gardens and Demesnes of special historic interest, maintained by the Department for Communities."</i></p> <p>Part 1, page 160, Design and Access Statement: <i>"A Design and Access Statement [D&AS] is a single document that explains the design thinking behind a planning application. It provides a framework for applicants to explain and to justify how a proposed development is a suitable response to the site and its setting."</i></p> <p>Part 1, page 162, Scheduled Monuments: <i>"Statutory designations of archaeological sites or other heritage assets of national importance protecting them from damage or disturbance."</i></p>	<p>In response to representation from Historic Environment Division, HED (DPS-030) recommending including definition for a 'Heritage Asset' and amendments to the definitions for Listed Building; Historic Park, Garden or Demesne of Special Historic Interest; Design and Access Statement; and, Scheduled Monuments</p>	<p>Does not impact upon the soundness of the Plan</p>

PART TWO OPERATIONAL POLICIES				
Minor Change Reference	Chapter/Policy of draft Plan Strategy	Proposed Minor Change	Reason	Justification (Assessed against DPPN10)
A: A QUALITY PLACE – ENABLING SUSTAINABLE COMMUNITIES AND DELIVERY OF NEW HOMES				
MC12	HOU1 New Residential Development	The Council proposes for clarity, as a minor change, to amend criteria c) of Policy HOU1, page 12, as follows: “c) in designated city and town centres, <i>and within settlement development limits of the city, towns, greater urban areas</i> , villages and small settlements.”	In response to representations from a number of Planning Agents (DPS-039; DPS-073; DPS-077; DPS-087; DPS-088; DPS-089) stating that Policy HOU1 is currently too restrictive and provides three overly prescriptive criteria for future housing lands	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC13	HOU4 Design in New Residential Development	The Council proposes for clarity, as a minor change, to amend the second sentence of criteria e) of Policy HOU4, page 15, as follows: “The design of dwellings should ensure they are capable of adaption to provide accommodation that is wheelchair <i>useable accessible</i> for those in society who are mobility impaired.”	In response to representation from Dfl (DPS-109) seeking clarification if criteria (e) relates solely to access or requires dwellings to be capable of modification for occupation by wheelchair users	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC14	HOU5 Public Open Space in New Residential Development	The Council proposes for clarity, as a minor change, to amend paragraph 1 of the J&A of Policy HOU5, page 20, as follows: “Public open space can be provided in a variety of forms ranging from village greens and small parks through to equipped play areas and sports pitches. In addition, the creation or retention of <i>blue/green infrastructure</i> , woodland areas, other natural or semi-natural areas of open space can provide valuable habitats for wildlife, promote biodiversity.”	In response to representation from Dfl (DPS-109), Water and Drainage Policy Division reference to Blue and Green Infrastructure	Does not impact upon the soundness of the Plan

MC15	HOU6 Design Concept Statements, Concept Masterplans and Comprehensive Planning	The Council proposes for clarity, as a minor change, to amend paragraph 1 of the J&A of Policy HOU6, page 21, including a third sentence as follows: <i>“A Design and Access Statement, may also be required for residential development in accordance with Section 6(1) of the Planning (General Development Procedure) Order (Northern Ireland) 2015.”</i>	In response to representations from Turley on behalf of Johncorp (No.1) Ltd. (DPS-072) regarding additional legislative requirements re Design and Access Statements	Does not impact upon the soundness of the Plan
MC16	HOU9 The Conversion or Change of Use of Existing Buildings to Flats or Apartments	It is necessary to remove reference to Development Control Advice Note (DCAN) 8 – Housing in Existing Urban Areas. The Council proposes for clarity, as a minor change, to delete the last paragraph of the J&A of Policy HOU9, page 25	As a result of DfI notification of 18 th October 2019 that this DCAN will cease to have effect once the Council adopts its Plan Strategy	Does not impact upon the soundness of the Plan
MC17	HOU10 Affordable Housing in Settlements	The Council proposes for clarity, as a minor change, to amend part b), paragraph 6 of Policy HOU10, page 26, as follows: <i>“b) the application is made by a registered Housing Association or the Northern Ireland Housing Executive.”</i>	In response to representation from NIHE (DPS-12) in relation to the policies COU5 and OS1 and to ensure consistency of wording across all 3 of these policies	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC18	HOU11 Specialist Accommodation	The Council proposes for clarity, as a minor change, to amend the first sentence of the J&A of Policy HOU11, page 27, as follows: <i>“Specialist residential accommodation is purpose-built or converted residential accommodation designed to provide opportunity for individuals to access accommodation that is more suitable for their needs, such as retirement villages sheltered housing and care-related facilities.”</i>	In response to representations from NIHE (DPS-12) and DfI (DPS-109) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan
MC19A	HOU12 Accommodation for the Travelling Community	The Council proposes for clarity, as a minor change, to amend criteria a) of Policy HOU12, page 27, as follows; <i>“a) adequate landscaping is provided to visually integrate the proposal.”</i>	In response to representation from NIEA (DPS-060) to clarify policy intention	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only

MC19B	HOU12 Accommodation for the Travelling Community	The Council proposes for clarity, as a minor change, to amend paragraph 3 of Policy HOU12, page 27, as follows: “Exceptionally, a single traveller transit site or serviced site may be permitted in the countryside. Such proposals will be assessed on their merits, having regard to the above criteria and <i>the sequential test requirements of Policy COU5.</i> ”	In response to representation from DfI (DPS-109) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC19C	HOU12 Accommodation for the Travelling Community	The Council proposes for clarity, as a minor change, to insert the following sentence at the end of the J&A of Policy HOU12, page 28: “ <i>Further information is available in the Design Guide for Travellers’ Sites NI (draft 2019), published by DfC.</i> ”	In response to representation from NIHE (DPS-060) regarding relevant additional information	Does not impact upon the soundness of the Plan
MC20A	COU3 Replacement Dwellings	The Council proposes for clarity, as a minor change, to insert the following sub-heading before paragraph 3 of Policy COU3, page 32: “ <i>Non-Listed Vernacular Dwellings</i> ”	In response to representation from HED (DPS-030) to draw attention to policy heading	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC20B	COU3 Replacement Dwellings	The Council proposes for clarity, as a minor change, to amend paragraph 3 of Policy COU3, page 32, as follows: “The retention and sympathetic refurbishment, with adaptation if necessary, of non-listed vernacular dwellings in the countryside will be encouraged in preference to their replacement <i>in accordance with Planning Policies COU4 and HE13.</i> ”	In response to representation from HED (DPS-030) to provide cross-referencing to relevant policies	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC21A	COU5 Affordable Housing	The Council proposes for clarity, as a minor change, to amend the first sentence of Policy COU5, page 34, as follows: “Planning permission will be granted by exception for a small group of no more than 14 dwellings adjacent to or near a village or small settlement to provide affordable housing which meets a identified need <i>identified by the Northern Ireland Housing Executive within that settlement.</i> ”	In response to representations from NIHE (DPS-012); Turley on behalf of NIFHA (DPS-032) and Clanmil Housing Association (DPS-048) concerning clarity of the wording in J&A	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only

MC21B	COU5 Affordable Housing	The Council proposes for clarity, as a minor change, to amend the last paragraph in the J&A of Policy COU5, page 35, as follows: “Planning permission will only be granted where the application is made by a registered Housing Association <i>or the Northern Ireland Housing Executive</i> ”.	In response to representations from NIHE (DPS-012); Turley on behalf of NIFHA (DPS-032) and Clanmil Housing Association (DPS-048) concerning clarity of the wording in J&A	Does not impact upon the soundness of the Plan
MC22	COU8 Infill/Ribbon Development	The Council proposes for clarity, as a minor change, to amend paragraph 1 of Policy COU8, page 36, to reflect the wording of the SPPS as follows: “Planning permission will be refused for a building which <i>creates extends</i> or adds to a ribbon of development.”	In response to representation from RSPB NI (DPS-093), to bring the Policy into line with the wording of the SPPS/PPS21	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC23	COU15 Integration and Design of Buildings in the Countryside	The Council proposes for clarity, as a minor change, to insert a sentence at the end of the J&A of Policy COU15 under subheading ‘Integration’ page 41, as follows: <i>“All landscape features which are required to be retained will be appropriately conditioned to be protected prior to the commencement of any other site works including site clearance.”</i>	In response to representation by NIEA (DPS-060) to clarify the policy intention	Does not impact upon the soundness of the Plan
B: A THRIVING PLACE – DRIVING SUSTAINABLE ECONOMIC GROWTH				
MC24A	MD1 Environmental Protection	The Council proposes for clarity, as a minor change, to amend paragraph 1 of the J&A of Policy MD1, page 51, as follows: “In all <i>areas-circumstances</i> decisions on mineral applications will be made with regard to the preservation of <i>good-quality agricultural-land soil quality (where this is particularly suitable for agriculture), water quality</i> , tree and vegetation cover, wildlife habitats, natural features of interest in the landscape and sites of archaeological and historic interest.”	In response to representations from Minerals Products Association Northern Ireland (DPS-029) and Conexpo (N.I.) Ltd. (DPS-042) concerning aligning the wording with paragraph 6.163 of the SPPS	Does not impact upon the soundness of the Plan

MC24B	MD1 Environmental Protection	The Council proposes for clarity, as a minor change, to insert the following sentence to the final paragraph of the J&A of Policy MD1, page 51, as follows: <i>“The Council, having regard to Environmental Impact Assessment (EIA), Habitats Regulations Assessment (HRA) and the Wildlife and Natural Environment Act (NI) 2011 (WANE), where necessary, will balance the case for a particular mineral working proposal against the need to protect and conserve the environment.”</i>	In response to representation from NIEA (DPS-060) regarding reference to other key legislation	Does not impact upon the soundness of the Plan
MC24C	MD1 Environmental Protection	The Council proposes for clarity, as a minor change, to amend Policy MD1, page 51, by removing the second paragraph of the J&A and placing it in the Policy (last paragraph) as follows: <i>“Permission for the extraction of peat for sale will only be granted where the proposals are consistent with the protection of boglands valuable to nature conservation interests, and with the protection of landscape quality particularly in AONBs.”</i>	In response to representation from DfI (DPS-109) concerning aligning the policy with the SPPS	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC25	MD4 Valuable Minerals	The Council proposes for clarity, as a minor change, to amend the last sentence of the J&A of Policy MD4, page 52, as follows: “Applications are likely to be subject to assessment under the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017, <i>and other assessments as outlined in the Justification and Amplification of Policy MD1.</i> ”	In response to representation from NIEA (DPS-060) concerning relevant assessments	Does not impact upon the soundness of the Plan

C: A VIBRANT PLACE – GROWING OUR CITY, TOWN CENTRES, RETAILING AND OTHER USES				
MC26A	TC1 Town Centres, Retailing and Other Uses	<p>The Council proposes for clarity, as a minor change, to amend Policy TC1, page 56, as follows: “c) edge of <i>city or</i> town centres d) out of town centre locations – only where sites are accessible by a choice of good public transport.”</p> <p>The Council proposes for clarity, as a minor change, to amend the J&A of Policy TC1, page 56 (paragraph 2 and 3 respectively): “The provision of a <i>retail hierarchy sequential approach</i> enables a range of retailing opportunities appropriate to the needs of the community.’ Business uses are encouraged as appropriate <i>in the hierarchy</i> to assist with urban regeneration, increase footfall and job creation.”</p>	In response to representations from Inaltus on behalf of Drumkeen Holdings Ltd (DPS-036) and One2One Planning on behalf of Forestside Acquisitions Ltd.(DPS-066) concerning clarity of the policy	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC26B	TC1 Town Centres, Retailing and Other Uses	<p>The Council proposes for clarity, as a minor change, to insert the following sentence into paragraph 2 of the J&A of Policy TC1, page 56, as follows: “...Preference will then be given to an edge of centre location before considering an out of centre location. <i>For a site to be considered as edge-of-centre a default distance threshold of 300 metres from the town centre boundary will apply.</i>”</p>	In response to representation from DfI (DPS-109) concerning the default distance specified within the SPPS	Does not impact upon the soundness of the Plan
MC27	TC3 Town Centres	<p>The Council proposes for clarity, as a minor change, to amend paragraph 2 of Policy TC3, page 57, as follows: “Beyond a designated town centre boundary, proposals for town centre uses will only be granted planning permission in accordance with the sequential approach of Policy TC1 <i>Where it is demonstrated no suitable sites exist within the town centre, no adverse impact on the role and function of the town centre will occur as a result of the proposal</i> and there would be no adverse impact on adjacent land uses.”</p>	In response to representation from One2One Planning on behalf of Forestside Acquisitions Ltd. (DPS-066) concerning clarity of the policy	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only

MC28	TC4 District and Local Centres	The Council proposes for clarity, as a minor change, to include the following opening sentence to the J&A of Policy TC4, page 57, as follows: <i>“The role and function of a District Centre is to perform a complementary role for retailing and services to existing city and town centres; the role and function of a Local Centre is to provide a local level of retailing and services to cater for a local population.”</i>	In response to representation from Dfl (DPS-109) concerning the role and function of District and Local Centres	Does not impact upon the soundness of the Plan
MC29	TC5 Villages and Small Settlements	The Council proposes for clarity, as a minor change, to amend paragraph 4 of Policy COU1, page 31, as follows: “There are a range of other non-residential development proposals that may in principle be acceptable in the countryside. Such proposals must comply with all policy requirements contained in the operational policies, where relevant to the development. <i>Development of inappropriate retailing in the countryside will be resisted. Retailing opportunities in the countryside will only be considered in relation to Policies COU11 and COU14 and, in exceptional cases Policy TC6.”</i>	In response to representation from Dfl (DPS-109) concerning clarity in respect of retailing in the countryside	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
D: AN ATTRACTIVE PLACE – PROMOTING SUSTAINABLE TOURISM, OPEN SPACE, SPORT AND OUTDOOR RECREATION				
MC30	TOU1 Tourism Development in Settlements	The Council proposes for clarity, as a minor change, to amend paragraph 4 of the J&A, page 62, as follows: “There is a requirement for high quality design and high quality service provision in areas with other relevant designations such as Conservation Areas, Areas of Townscape or Village Character, <i>Scheduled Monuments, Listed Buildings and Historic Parks, Gardens and Demesnes.</i> ”	In response to representation from HED (DPS-030) concerning additional reference to designations in the J&A	Does not impact upon the soundness of the Plan
MC31A	TOU2 Proposals for Tourism Amenity in the Countryside	The Council proposes for clarity, as a minor change, to amend paragraph 3 of the J&A of Policy TOU2, page 63, as follows: “A tourism benefit statement <i>and sustainable benefit statement must demonstrate benefit to the region and locality taking account of the considerations set out in Supplementary Planning Guidance, Part D, Tourism, Page 33. A tourism benefit statement must demonstrate the value of the proposal...</i> ”	In response to representation from Dfl (DPS-109) concerning clarity between the two statements identified in the J&A	Does not impact upon the soundness of the Plan

MC31B	TOU2 Proposals for Tourism Amenity in the Countryside	The Council proposes for clarity, as a minor change, to amend paragraph 4 of Policy TOU2, page 62, as follows: “An extension of any existing tourist amenity will <i>only</i> be permitted where its scale and nature does not harm the rural character, amenity, landscape quality or environmental integrity of its locality.”	In response to representation from Dfl (DPS-10) concerning unnecessary addition of the word ‘only’ in the policy	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC32A	TOU3 Proposals for Tourist Accommodation in the Countryside	The Council proposes for clarity, as a minor change, to amend paragraph 1 of the J&A of Policy TOU3, page 64, as follows: “The retention and conversion <i>and reuse</i> of a vernacular building <i>or a suitable locally important building</i> for such uses, will be favourably considered <i>and assessed under HE13, COU4 and COU14 as appropriate</i> . Where <i>it is demonstrated</i> the environmental benefit of the full or partial replacement will outweigh the retention and conversion of the building The retention of vernacular buildings are therefore encouraged a report on the condition of the building and the economic feasibility of repairing and maintaining it will be assessed for such proposals.”	In response to representations from HED (DPS-030) and Dfl (DPS-109) suggesting clarification of the J&A	Does not impact upon the soundness of the Plan
MC32B	TOU3 Proposals for Tourist Accommodation in the Countryside	The Council proposes for clarity, as a minor change, to insert the following paragraph under paragraph 3 of the J&A of Policy TOU3, page 64, (which repeats the J&A under Policy HE8) as follows: “ <i>In the case of replacement of a vernacular building or a suitable locally important building in the countryside, a proposal must be accompanied by evidence reports to ascertain structural soundness. Such reports must be submitted by suitably experienced and accredited engineers, architects or building surveyors in the conservation field.</i> ”	In response to representation from Dfl (DPS-109) concerning clarity of the J&A	Does not impact upon the soundness of the Plan
MC32C	TOU3 Proposals for Tourist Accommodation in the Countryside	The Council proposes for clarity, as a minor change, to amend paragraph 3 of the J&A, page 64, as follows:- “Applications made under this policy will be <i>required expected</i> to be accompanied with the following information:	In response to representation from Dfl (DPS-109) concerning clarity of the J&A	Does not impact upon the soundness of the Plan

		<ul style="list-style-type: none"> • <i>Sufficient</i> evidence to indicate how firm or realistic the particular proposal is and what sources of finance are available (including any grant aid) to sustain the project • <i>Detailed</i> evidence that there is no reasonable prospect of securing a suitable site within the limits of the particular settlement or other nearby settlement • justification for the particular site chosen and illustrative details of the proposed design and site layout.” 		
MC32D	TOU3 Proposals for Tourist Accommodation in the Countryside	<p>The Council proposes for clarity, as a minor change, to amend Policy TOU3, page 63, under the sub-heading ‘Tourist Accommodation on the Periphery of a Settlement’ as follows:</p> <p>“b) there are no suitable opportunities <i>in the locality</i> by means of;</p> <ul style="list-style-type: none"> • the conversion and reuse of a suitable building(s) or • The replacement of a suitable building(s)” 	In response to representation from One2One Planning (DPS-124) concerning ambiguity of the policy	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC33	OS1 Protection of Open Space	<p>The Council proposes for clarity, as a minor change, to amend the third sentence of paragraph 3 of the J&A, page 68, as follows:</p> <p>“Any exception to this policy approach will only be appropriate where it is demonstrated that redevelopment would bring substantial community benefit that outweighs the loss of open space, for example the provision of affordable housing by a Housing Association <i>or the Northern Ireland Housing Executive</i> in accordance with Policy HOU10; or where it is demonstrated that the loss of open space will have no significant detrimental impact.”</p>	In response to a representation from NIHE (DPS-012) seeking their inclusion as an affordable housing applicant/provider	Does not impact upon the soundness of the Plan
E: A GREEN PLACE – PROTECTING AND ENHANCING THE HISTORIC AND NATURAL ENVIRONMENT				
MC34A	HE1 The Preservation of Archaeological Remains of Regional Importance and their Settings	<p>The Council proposes for clarity, as a minor change, to remove the last sentence in third paragraph of the J&A, page 74, as follows:</p> <p><i>“In the majority of cases it should prove possible for differences to be resolved through voluntary discussion and for a satisfactory compromise to be reached.”</i></p>	In response to representation from HED (DPS-030) concerning the clarity of the J&A	Does not impact upon the soundness of the Plan

MC34B	HE1 The Preservation of Archaeological Remains of Regional Importance and their Settings	The Council proposes for clarity, as a minor change, to amend the first bullet point of the J&A, page 74, as follows: <i>"The critical views of, and from the site or monument including the protection of its setting"</i>	In response to representation from HED (DPS-030) concerning clarity of the J&A	Does not impact upon the soundness of the Plan
MC35A	HE6 Change of Use and/or Extensions or Alterations to a Listed Building	The Council proposes for clarity, as a minor change, to amend the second sentence of Policy HE6, page 77, as follows: "Such development should respect the essential character, <i>special</i> architectural or historic interest of the building and its setting, and that features of special interest remain intact and unimpaired."	In response to representation from HED (DPS-030) concerning clarity of the policy	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC35B	HE6 Change of Use and/or Extensions or Alterations to a Listed Building	The Council proposes for clarity, as a minor change, to amend paragraph 1 of the J&A of HE6, page 77, including a third sentence as follows: <i>"The works and architectural details should use quality materials and techniques (traditional and/or sympathetic) in keeping with the listed building."</i>	In response to representation from HED (DPS-030) concerning clarity of the wording in J&A	Does not impact upon the soundness of the Plan
MC35C	HE6 Change of Use and/or Extensions or Alterations to a Listed Building	The Council proposes for clarity, as a minor change, to amend paragraph 5 of the J&A, page 77, as follows: "All proposals for alteration should also be based on a proper understanding of the significance of the listed building. because it is vitally important that new work does not weaken the structural integrity of the building. "	In response to representation from HED (DPS-030) concerning clarity of the wording in J&A	Does not impact upon the soundness of the Plan
MC36	HE7 Control of Advertisements on a Listed Building	The Council proposes for clarity, as a minor change, to amend the first sentence of Policy HE7, page 78, to include the word 'only', to read consistently with the wording of paragraph 6.14 of the SPPS as follows: "The Council will grant the consents necessary for advertisements or signs on a listed building <i>only</i> where these are carefully designed and located to respect the architectural form and	In response to representation from HED (DPS-030) noting its omission	Does not impact upon the soundness of the Plan– whilst this is a change to policy it is considered a minor/factual correction for clarification only

		detailing of the building, amenity of the locality and which are not detrimental to public safety.”		
MC37	HE8 Demolition or Partial Demolition of a Listed Building	The Council proposes for clarity, as a minor change, to amend the J&A of Policy HE8 as follows: <i>“Where consent to demolish a listed building is granted, this will normally be conditional on prior agreement for the redevelopment of the site and appropriate arrangements for recording the building prior to its demolition.”</i> (This sentence should be inserted before the last paragraph of the J&A on page 79).	In response to representation from HED (DPS-030) concerning clarity of the wording in J&A	Does not impact upon the soundness of the Plan
MC38	HE9 Development Affecting the Setting of a Listed Building	The Council proposes for clarity, as a minor change, to amend criteria (b) of Policy HE9, page 79, as follows: <i>“(b) the works proposed make use of traditional or sympathetic building materials and techniques and architectural details should use quality materials and techniques (traditional and/or sympathetic) which respect those found on-in keeping with the listed building.”</i>	In response to representation from HED (DPS-030) concerning clarity of the policy	Does not impact upon the soundness of the Plan– whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC39A	HE10 New Development in a Conservation Area or Area of Townscape Character/Area of Village Character	The Council proposes for clarity, as a minor change, to remove the following paragraphs from Policy HE10 and place in the J&A, page 80, as first and second paragraphs, as follows: <i>Remove the first paragraph that deals with CA designation and place as first paragraph of J&A; and</i> <i>Remove the third paragraph that deals with ATC and AVC designation and place as second paragraph of J&A</i>	In response to representation from HED (DPS-030) stating that these sentences are best placed in the J&A	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC39B	HE10 New Development in a Conservation Area or Area of Townscape Character/Area of Village Character	The Council proposes for clarity, as a minor change, to amend the first paragraph of the J&A of Policy HE10, page 80, as follows: “Designation as a Conservation Area or ATC/AVC puts and onus on prospective developers to produce a very high standard of design <i>in accordance with the following criteria.”</i> which preserves or enhances the particular qualities of the area in question.”	In response to representations from HED (DPS-030) and NIEA (DPS-060) concerning clarity of the wording used	Does not impact upon the soundness of the Plan

MC40	HE11 The Control of Advertisements in a Conservation Area or Area of Townscape Character/Area of Village Character	The Council proposes for clarity, as a minor change, to amend Policy HE11 (and include as a separate paragraph), page 82, as follows: <i>“and the All proposals must also meet the requirements of operational Policy AD1 on the Control of Outdoor Advertisements.”</i>	In response to representation from HED (DPS-030) concerning clarity of the policy	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC41	HE12 Demolition or Partial Demolition in a Conservation Area or Area of Townscape Character/Area of Village Character	The Council proposes for clarity, as a minor change, to amend paragraph 2 of the J&A of Policy HE12, page 82, as follows: <i>“The onus will be on the applicant to demonstrate and justify why the building makes no material contribution and the need for demolition.”</i>	In response to representation from HED (DPS-030) concerning the clarity of the wording in the J&A	Does not impact upon the soundness of the Plan
MC42	HE13 The Conversion and Reuse of Non-Listed Buildings	The Council proposes for clarity, as a minor change, to amend paragraph 1 of the J&A of HE13, page 83, as follows: <i>“For the purposes of this policy ‘Vernacular Buildings’ are those that reflect the local ‘folk tradition’ and are typical of a common type of building in a particular locality, generally pre 1925. For more detail refer to ‘A Sense of Loss – the Survival of Rural Traditional Buildings in Northern Ireland’ published by the Department, March 1998. A ‘Locally Important Building’ is a building, structure or feature, whilst not statutory listed, that has been identified by the Council as an important part of their heritage, due to its local architectural or historic significance.”</i>	In response to representation from HED (DPS-030) concerning the clarity of the wording in the J&A	Does not impact upon the soundness of the Plan
MC43	NH1 European and Ramsar Sites – International	The Council proposes for clarity, as a minor change, to insert the word ‘and’ into Policy NH1 at paragraphs 3 and 4, page 85, as follows: “In exceptional circumstances, a development proposal which could adversely affect the integrity of a European or Ramsar site may only be permitted where: a) there are no alternative solutions; and	In response to representation from NIEA (DPS-060) suggesting that it would be good practice to copy across the equivalent policy from PPS2, including the word ‘and’ following each requirement in exceptional circumstances	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only

		<p>b) the proposed development is required for imperative reasons of overriding public interest; <i>and</i></p> <p>c) compensatory measures are agreed and fully secured.</p> <p>As part of the consideration of exceptional circumstances, where a European or a listed or proposed Ramsar site hosts a priority habitat or priority species listed in Annex I or II of the Habitats Directive, a development proposal will only be permitted when:</p> <p>a) it is necessary for reasons of human health or public safety or there is a beneficial consequence of primary importance to the environment; <i>and</i>,</p> <p>b) agreed in advance with the European Commission.”</p>		
MC44	NH2 Species Protected by Law	<p>The Council notes the comment and also notes that an error occurred under part b), which should have consisted of two separate points. The Council proposes for clarity, as a minor change, to insert the word ‘and’ into Policy NH2 at paragraph 2, page 86 and to split criteria b) as follows:</p> <p>“In exceptional circumstances a development proposal that is likely to harm these species may only be permitted where:</p> <p>a) there are no alternative solutions; <i>and</i>,</p> <p>b) it is required for imperative reasons of overriding public interest; <i>and</i>,</p> <p>c) there is no detriment to the maintenance of the population of the species at a favourable conservation status; <i>and</i>,</p> <p>d) compensatory measures are agreed and fully secured.”</p>	In response to representation from NIEA suggesting that it would be good practice to copy across the equivalent policy from PPS2, including the word ‘and’ following each requirement in exceptional circumstances	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only

MC45	NH3 Sites of Nature Conservation Importance - National	The Council proposes for clarity, as a minor change, to insert reference to Marine Conservation Zone to paragraph 1 of Policy NH3, page 86, as follows: <ul style="list-style-type: none"> a) an Area of Special Scientific Interest b) a National Nature Reserve c) a Nature Reserve d) <i>a Marine Conservation Zone²</i> 	In response to representation from RSPB NI (DPS-093) in respect of marine conservation zones	Does not impact upon the soundness of the Plan
MC46	NH6 Areas of Outstanding Natural Beauty	The Council proposes for clarity, as a minor change, to amend paragraph 1 of Policy NH6, page 88, as follows: “Planning permission for new development of an appropriate design, size and scale for its locality within an Area of Outstanding Natural Beauty (AONB) will only be granted where it is of an appropriate design, <i>size and scale for the locality is sensitive to the distinctive special character of the area and the quality of its landscape, heritage and wildlife, and</i> where all the following criteria are met.”	In response to representation from DfI (DPS-109) concerning clarity of the policy	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
F: A CONNECTED PLACE – SUPPORTING SUSTAINABLE TRANSPORT AND OTHER INFRASTRUCTURE				
MC47	TRA1 Creating an Accessible Environment	It is necessary to remove reference to Development Control Advice Note (DCAN) 11 and draft DCAN11. The Council proposes for clarity, as a minor change, to amend the last paragraph of the J&A of policy TRA1, page 92, as follows: “Further information on designing for a more accessible environment is set out in the Department’s <i>Development Control Advice Note (DCAN) 11 ‘Access for People with Disabilities’, draft DCAN11 ‘Access for All’ and ‘Creating Places – Achieving Quality in Residential Developments’ (May 2000) documents.</i> ”	As a result of DfI notification of 18 th October 2019 that it had withdrawn DCAN11 and draft DCAN11	Does not impact upon the soundness of the Plan
MC48	TRA2 Access to Public Roads	The Council proposes for clarity, as a minor change, to amend the second last paragraph of J&A, page 93, to replace the word ‘Department’ with the word <i>‘Council’</i>	In response to DfI noting this as a typographical error	Does not impact upon the soundness of the Plan

² Paragraph 215 of the Draft Marine Plan for Northern Ireland, April 2018

MC49	TRA6 Transport Assessment	The Council proposes for clarity, as a minor change, to include the following paragraph in the J&A of Policy TRA6 (first paragraph), page 95, as follows: <i>“Transport Assessment applies to all forms of development with a significant travel generation impact. A primary aim of the Transport Assessment is to assess accessibility by sustainable modes and to develop measures to maximise use of sustainable modes; only subsequently should the residual traffic be assessed and its impacts ameliorated.”</i>	In response to representation from Dfl (DPS-109) concerning clarification of the role of a Transport Assessment	Does not impact upon the soundness of the Plan
MC50	TRA7 Car Parking and Servicing Arrangements in New Developments	It is necessary to remove reference to Development Control Advice Note (DCAN) 11 and draft DCAN11. The Council proposes for clarity, as a minor change, to amend footnote 34, page 96, as follows: <i>“Department’s Development Control Advice Note 11 ‘Access for People with Disabilities’ (1991), draft DCAN11 ‘Access for All’ (July 2003 and ‘Creating Places – Achieving Quality in Residential Developments’ (May 2000) documents”</i>	As a result of Dfl notification of 18 th October 2019 that it had withdrawn DCAN11 and draft DCAN11	Does not impact upon the soundness of the Plan
MC51	TRA10 Provision of Public and Private Car Parks	The Council proposes for clarity, as a minor change, to amend bullet point a) of Policy TRA10, page 98, as follows: <i>“a) they meet a need identified by the Department’s Local Transport Plan or a comprehensive Car Parking Strategy prepared jointly with the Department, where applicable.”</i>	In response to representation from Dfl (DPS-109)	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC52A	RE1 Renewable Energy Development	The Council proposes for clarity, as a minor change, to amend paragraph 3 of the J&A of Policy RE1, page 100, as follows: <i>“All renewable energy proposals, including proposals to reutilise established sites, will be assessed against this planning policy, having regard to the Department publication Best Practice Guidance to Renewable Energy...”</i>	In response to representation from RSPB NI (DPS-093) concerning clarity of the wording in J&A	Does not impact upon the soundness of the Plan

MC52B	RE1 Renewable Energy Development	The Council proposes for clarity, as a minor change, to amend paragraph 1, part d) of Policy RE1, page 100, as follows: “d) local natural resources, such as air quality or water quality <i>or quantity</i> ”	In response to representation from DfI (DPS-109) concerning the correlation of text to that in paragraph 6.224 of the SPPS	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC52C	RE1 Renewable Energy Development	The Council proposes for clarity, as a minor change, to include the following paragraph in the J&A of Policy RE1 (before the final paragraph), page 100, as follows: “ <i>All renewable energy proposals will be assessed in accordance with normal planning criteria including such considerations as access arrangements, road safety, good design, noise and shadow flicker, separation distance, cumulative impact, communications interference and the inter-relationship between these considerations.</i> ”	In response to representation from RSPB NI (DPS-093) concerning clarity of the wording in J&A and correlation of text to that in paragraph 6.229 of the SPPS	Does not impact upon the soundness of the Plan
MC52D	RE1 Renewable Energy Development	The Council proposes for clarity, as a minor change, to amend paragraph 3 of the J&A, page 100, as follows: “All renewable energy proposals will be assessed against this planning policy having regard to the <i>following</i> Department publications: Best Practice Guidance to Renewable Energy (published <i>by the former Department of Environment</i> 2009), <i>Draft Supplementary Planning Guidance Anaerobic Digestion (published 2013)</i> ; and <i>Wind Energy Development in Northern Ireland’s Landscapes’ (published 2009)</i> in assessing all wind turbine proposals.”	In response to representation from RSPB NI (DPS-093) concerning clarity of the wording in J&A	Does not impact upon the soundness of the Plan
MC52E	RE1 Renewable Energy Development	The Council proposes for clarity, as a minor change, to amend the 5 th paragraph of Policy RE1, page 100, as follows: “ Wind turbines must have <i>For wind farm development</i> a separation distance of 10 times rotor diameter to occupied property, with a minimum distance not less than 500m for wind farm proposals, will <i>generally apply.</i> ”	In response to representation from DfI (DPS-109) concerning ambiguity between the proposed policy wording and that within the SPPS and regional guidance	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only

MC53	WM1 Waste Management Facilities	The Council proposes for clarity, as a minor change, to amend the J&A of Policy WM1, page 106, through inclusion of the following sentence to the end of the fifth paragraph, as follows: <i>"In assessing all proposals the Council will be guided by the precautionary approach in accordance with paragraph 6.322 of the SPPS."</i>	In response to representation from RSPB NI (DPS-093) suggesting that SP23 is not consistent with the SPPS in terms of the 'precautionary approach' (See MC9C above)	Does not impact upon the soundness of the Plan
MC54A	WM2 Treatment of Waste Water	The Council proposes for clarity, as a minor change, to insert the word 'treated' into paragraph 2 of Policy WM2, page 107, as follows: "Development relying on non mains sewage treatment will only be permitted where it is demonstrated to the Council and its statutory consultees that there is sufficient capacity to discharge <i>treated</i> effluent to a watercourse..."	In response to representation from DfI (DPS-109) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC54B	WM2 Treatment of Waste Water	The Council proposes for clarity, as a minor change, to amend paragraph 2 of Policy WM2, page 107, as follows; "Development relying on non mains sewerage treatment... and that this will not create or add to a pollution problem <i>or add to or create additional flood risk.</i> "	In response to representation from DfI (DPS-109) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC55	WM5 Development in the Vicinity of Waste Management Facilities or Wastewater Treatment Works	The Council proposes for clarity, as a minor change, to amend the J&A of Policy WM5, page 109, by inserting an additional final paragraph as follows: <i>"Where development is to be located in close proximity to an existing or approved NI Water WwTW facility developers should discuss their proposals with NI Water, and may be required to undertake a Development Encroachment/Odour Assessment. Further details are available at: www.niwater.com"</i>	In response to representation from NI Water (DPS-046) concerning clarity of the J&A	Does not impact upon the soundness of the Plan
MC56A	FLD1 Development in Fluvial (River) Flood Plains	The Council proposes for clarity, as a minor change, to move paragraph 2 of Policy FLD1, page 111, to become the second paragraph of Policy FLD1, page 110, as follows:	In response to representation from RSPB NI (DPS-093) concerning the presentational layout of the policy	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/

		“Where the principle of development is accepted by the Council through meeting any of the <i>above</i> ‘Exceptions Tests’ the applicant is required to submit a Flood Risk Assessment (FRA)...”		factual correction for clarification only
MC56B	FLD1 Development in Fluvial (River) Flood Plains	The Council proposes for clarity, as a minor change, to amend the first line of Policy FLD1, page 110, as follows: “New development will not be permitted within the 1 in 100 year fluvial flood plain (<i>AEP of 1%</i>) unless the applicant can demonstrate that the proposal constitutes an exception to the policy in the following cases:” Additionally, the Council proposes to amend the J&A on page 111 to include the following: “For planning purposes, taking into account climate change predictions based on available scientific evidence a fluvial flood plain is defined as the extent of a flood event within a 1 in 100 year probability (or 1% annual <i>exceedance</i> probability (<i>AEP</i>)) of exceeding the peak floodwater level.”	In response to representation from DfI (DPS-109) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC56C	FLD1 Development in Fluvial (River) Flood Plains	The Council proposes for clarity, as a minor change, to amend paragraph 2 of Policy FLD1 under subheading ‘Exceptions in Defended Areas’, page 110, as follows: “On previously developed land protected by flood defences (<i>confirmed by DfI Rivers as shown on DfI Flood Maps NI</i>) that are structurally adequate and provide a minimum standard of 1 in 100 year fluvial flood protection.”	In response to representation from DfI (DPS-109) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC56D	FLD1 Development in Fluvial (River) Flood Plains	The Council proposes for clarity, as a minor change, to amend paragraph 2 of the J&A, page 111, as follows: “For planning purposes, taking into account climate change predictions based on available scientific evidence a fluvial flood plain is defined as the extent of a 1 in 100 year flood event (or 1% annual <i>exceedance</i> probability (<i>AEP</i>)) of exceeding the peak floodwater level, <i>taking into account climate change allowance as represented on DfI Flood Maps NI.</i> ”	In response to representation from DfI (DPS-109) concerning clarity of the wording in J&A	Does not impact upon the soundness of the Plan

MC57	FLD3 Development and Surface Water (Pluvial) Flood Risk Outside Flood Plains	The Council proposes for clarity, as a minor change, to amend paragraph 3 of Policy FLD3, page 114, as follows: "If a DA is not required, <i>but there is potential for surface water flooding as shown on the surface water layout of DfI Flood Maps NI</i> , it remains the responsibility of the developer to mitigate the effects of flooding and drainage as a result of the development."	In response to representation from DfI (DPS-109) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC58A	AD1 Amenity and Public Safety	The Council proposes for clarity, as a minor change, to amend the J&A of Policy AD1 Point 3, page 118, as follows: "3. which because of their size or brightness, could reduce the effectiveness of traffic lights/ <i>signs</i> , or result in glare or dazzle, or otherwise distract road users especially in wet or misty weather."	In response to representation from DfI (DPS-109) regarding insertion of traffic signs	Does not impact upon the soundness of the Plan
MC58B	AD1 Amenity and Public Safety	The Council proposes for clarity, as a minor change, to amend the heading of the final paragraph of the J&A to Policy AD1, page 118, as follows: "Listed Buildings, Conservation Areas and Areas of Townscape/ <i>Village</i> Character" The first sentence of the paragraph should then read: "Policies and guidance for the control of advertisements affecting Listed Buildings, Conservation Areas <i>and Areas of Townscape/Village Character</i> are set out in Operational Policies HE7 and HE11."	In response to representation from HED (DPS-030) concerning the inconsistency of wording between the headline and policy text of Policy HE11 and consequently this same issue occurs within Policy AD1	Does not impact upon the soundness of the Plan
GLOSSARY AND APPENDICES				
MC59	Glossary	The Council proposes for clarity, as a minor change, to include the following definition in the glossary of Part 2, page 120: <i>"Heritage Asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest."</i> The Council proposes for clarity, as a minor change, to amend the following definitions in the glossary: Page 121 Listed Building:	In response to representation from HED (DPS-030) regarding inclusion of definitions within the glossary	Does not impact upon the soundness of the Plan

		<p><i>“A listed building is a structure which the Department for Communities has included in a statutory list of buildings of special architectural and/or historic interest.”</i></p> <p>Page 120 Historic Park, Garden or Demesne of Special Historic Interest:</p> <p><i>“An identified site of international or regional importance within Northern Ireland, included in the Register of Parks, Gardens and Demesnes of special historic interest, maintained by the Department for Communities.”</i></p> <p>Page 120 Design and Access Statement:</p> <p><i>“A Design and Access Statement [D&AS] is a single document that explains the design thinking behind a planning application. It provides a framework for applicants to explain and to justify how a proposed development is a suitable response to the site and its setting.”</i></p> <p>Page 121 Scheduled Monuments:</p> <p><i>“Statutory designations of archaeological sites or other heritage assets of national importance protecting them from damage or disturbance.”</i></p>		
SUSTAINABILITY APPRAISAL REPORT SUMMARY AND ANALYSIS OF REPRESENTATIONS TO SUPPORTING DOCUMENTS				
MC60	Sustainability Appraisal Report	The Council proposes for clarity, as a minor change, to amend criteria b) of Strategic Policy 21, Part 1, page 146, as follows: “b) minimise any potential visual intrusion and environmental impacts to protect both the rural and urban landscape, <i>and natural and historic environment.</i> ”	In response to representation from HED (DPS-030) concerning clarity of the policy	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC61	Sustainability Appraisal Report	The Council proposes for clarity, as a minor change, to amend criteria b) of Strategic Policy 22, Part 1, page 149, as follows: “b) minimise any potential visual intrusion and environmental impacts to protect both the rural and urban landscape, <i>and natural and historic environment.</i> ”	In response to representation from HED (DPS-030) concerning clarity of the policy	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/

				factual correction for clarification only
HABITATS REGULATIONS ASSESSMENT REPORT SUMMARY AND ANALYSIS OF REPRESENTATIONS TO SUPPORTING DOCUMENTS				
MC62	ED9 General Criteria for Economic Development	The Council proposes for clarity, as a minor change, to add an additional criterion o) to the end of policy ED9, page 50, as follows: <i>“o) it meets the requirements of Policy NH1”.</i>	In response to representation from DAERA SEA Team (DPS-058) welcoming inclusion of mitigation measures set out in the draft HRA Report to ensure compliance with Conservation (Natural Habitats etc) Regulations (NI) 1995 (as amended)	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC63	MD1 Environmental Protection	The Council proposes for clarity, as a minor change, to add an additional sentence to the end of paragraph 1 of the J&A to policy MD1, page 51, as follows: <i>“Within the Council area there is one Special Protection Area (SPA) and Ramsar Site at Lough Neagh including the water body of Portmore Lough. All proposals that may affect a European or Ramsar site must meet the requirements of NH1.”</i>	In response to representation from DAERA SEA Team (DPS-058) welcoming inclusion of mitigation measures set out in the draft HRA Report to ensure compliance with Conservation (Natural Habitats etc) Regulations (NI) 1995 (as amended)	Does not impact upon the soundness of the Plan
MC64	MD4 Valuable Minerals	The Council proposes for clarity, as a minor change, to add an additional sentence to the end of policy MD4, page 52, as follows: <i>“All proposals that may affect a European or Ramsar site must meet the requirements of NH1.”</i>	In response to representation from DAERA SEA Team (DPS-058) welcoming inclusion of mitigation measures set out in the draft HRA Report to ensure compliance with Conservation (Natural Habitats etc) Regulations (NI) 1995 (as amended)	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only

MC65A	TOU7 General Criteria for Tourism Development	The Council proposes for clarity, as a minor change, to add an additional criterion k) to policy TOU7, page 67, as follows: <i>“k) all proposals that may affect a European or Ramsar site must meet the requirements of NH1”.</i>	In response to representation from DAERA SEA Team (DPS-058) welcoming inclusion of mitigation measures set out in the draft HRA Report to ensure compliance with Conservation (Natural Habitats etc) Regulations (NI) 1995 (as amended)	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
MC65B	TOU7 General Criteria for Tourism Development	The Council proposes for clarity, as a minor change, to add a second paragraph to the J&A of policy TOU7, page 67, as follows: <i>“Within the Council area there is one Special Protection Area (SPA) and Ramsar Site at Lough Neagh including the water body of Portmore Lough which could be adversely affected by cumulative disturbance effects. Such disturbance could arise directly from a tourism development or indirectly through increasing visitor pressures beyond the development”.</i>	In response to representation from DAERA SEA Team (DPS-058) welcoming inclusion of mitigation measures set out in the draft HRA Report to ensure compliance with Conservation (Natural Habitats etc) Regulations (NI) 1995 (as amended)	Does not impact upon the soundness of the Plan
MC66	UT1 Utilities	The Council proposes for clarity, as a minor change, to add an additional paragraph to the J&A of policy UT1, after paragraph 5, page 104, as follows: <i>“The potential of overhead lines to disrupt the flight paths of birds, including site selection features of Lough Neagh and Lough Beg Special Protection Area and Ramsar Site, is also a consideration”.</i>	In response to representation from DAERA SEA Team (DPS-058) welcoming inclusion of mitigation measures set out in the draft HRA Report to ensure compliance with Conservation (Natural Habitats etc) Regulations (NI) 1995 (as amended)	Does not impact upon the soundness of the Plan

OTHER MATTERS RAISED				
MC67	Maze Lands	The Council proposes for clarity, as a minor change, to remove references to the Maze lands from the Urban Capacity Study (page 44 and page 49) as follows: “There is a slight shortfall in land available to meet the emerging LDP requirement.”; <i>however the figures above do not include the Maze Strategic Land Reserve which has the potential for an additional 141 hectares of employment land.</i>	In response to representation Belfast City Council (DPS-041)	Does not impact upon the soundness of the Plan

Annex 1: See FC1B Strategic Housing Allocation

The allocation of housing growth across the Council area has been informed by the following eight indicators provided in the SPPS.

1. RDS Housing Growth Indicators (HGI): The HGI provides a guide for the provision of residential accommodation within the Council area in the future. The Council was provided with a 2012 based Housing Growth Indicator (HGI)¹ of 9,600 covering the period 2012-2025. Annually this equated to 738 dwellings.

The 2012-based HGI includes provision for both housing in settlements and housing in the countryside. Projecting this figure annually from 2017 to 2032 would provide an allocation of 11,070 dwellings over the lifetime of the Local Development Plan.

Given the importance of the HGI which sets the baseline level of future growth across all eleven council areas, the Council commissioned a Housing Growth Study² which examined the robustness of the RDS Housing Growth Indicators (HGI). ~~The study sought to update the 2012 based HGI through the use of 2016-based household projections data together with adjustments set out within the 2012 HGI methodology.~~ DfI published revised HGI figures in September 2019 covering the period 2016-2030 and identified a total need of 10,700 for LCCC (713dpa) for a 15 year time period. The Council commissioned a review of these published figures³. The period covered by the latest HGIs do not coincide with the period of the emerging LDP (2017-2032).

~~Taking account of adjustments, the review this identified a new baseline future growth of 10,380 households over the Plan period (692-723 dwellings per annum).~~ An adjustment was made to reflect the mid-point between the two employment-led scenarios that were included in the Housing Growth Study (as updated). This resulted in a dwelling requirement of 746 dwellings per annum.

¹ HGI provided by the former Department for Regional Development now Department for Infrastructure

This has been rounded up to ~~700~~ 750 dwellings per annum equating to ~~10,500~~ 11,250 dwellings for the Plan period. This baseline figure is used in Table 3.

There is a requirement for the Council to ensure that the identified HGI figure can be met. A buffer of 10% over-supply has been applied to the HGI baseline figure which takes into consideration the possibility that an element of the identified potential might not come forward during the plan period. This gives a resultant figure of ~~11,550~~ 12,375 units (825 dwellings per annum) over the Plan period from 2017 to 2032 and provides the overall strategic housing allocation figure (SHA). A total of 1,559 dwellings were completed between April 2017 and March 2019. As such, the remaining housing need that is to be met over the remainder of the Plan period (2019 to 2032) equates to 10,816 dwellings (832 dwellings per annum). ~~This SHA falls just under over the potential units remaining of 11,578 (Table 3).~~

The council is mindful of its responsibility to ensure housing growth aligns with the requirements for sustainable balanced regional growth identified through the RDS. In order to facilitate the Council's strategic economic ambition at West Lisburn up to 50 hectares of land is identified for residential use which could accommodate approximately 1,500 units (based on an average density of 30 units per hectare). This strategic location is also considered to be the most sustainable for future residential expansion taking account of environmental, social and economic factors. This level of housing growth in the future would help support the associated economic growth details of which are provided in the Employment Land Review, Technical Supplement 3.

2. Use of the RDS housing evaluation framework: The existing settlements in the Council area have been assessed against the RDS Housing Evaluation Framework using the six tests set out under Table 2.

The existing settlements are considered to provide a strong framework for the urban and rural areas. At the top of the hierarchy, sits Lisburn City; followed by the two Greater Urban Areas of Lisburn and Castlereagh; the three towns of

² See Technical Supplement 1 Housing Growth Study

³ See Addendum to Technical Supplement 1 Housing Growth Study, November 2020

Hillsborough & Culcavy, Moira and Carryduff; thirteen villages; and thirty-three small settlements.

Table 2 RDS Housing Evaluation Framework

Resource Test	Studies should be carried out to assess and detail the existence of community assets and physical infrastructure such as water, waste and sewage, including spare capacity.
Environmental Capacity Test	An assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made.
Transport Test	Studies should be carried out to assess the potential for integrating land use and public transport and walking and cycling routes to help reduce reliance on the car.
Economic Development Test	The potential to facilitate an appropriate housing and jobs balance and to unlock any major strategic development opportunities should be assessed and detailed.
Urban and Rural Character Test	Assessment should be made of the potential to maintain a sense of place, and to integrate new

⁴Published annually on the Council’s website

	development in a way that does not detract from the character and identity of the settlement.
Community Services Test	The potential to underpin and, where necessary, reinforce the community service role and function of the settlement should be assessed and detailed.

Details of the outcomes of the above settlement assessment are provided in the strategic Settlement Appraisal which forms part of the Countryside Assessment Technical Supplement 6.

3. Allowance for existing housing commitments: The assessment of existing commitments takes account of information provided through the Council’s Housing Monitor⁴. Monitored sites consists of existing housing zonings and committed sites (with planning permission). The Housing Monitor also assesses the available potential of land and dwellings that remain undeveloped within settlements in the Council Area.

The Housing Monitor (using the baseline of 31st March ~~2017~~2019) identified that in total ~~8,081~~ 7,311 units are committed (with planning permission) with a further ~~1,108~~ 943 potential units remaining on zoned land not committed **within the urban settlement limits**. This gives an overall total of ~~9,189~~ 8,254 units⁵.

When taken together and allowing for the potential in villages, small settlements and the open countryside this figure rises to ~~11,376~~ 10,072 units. These figures have been reduced by 10% due to the possibility of non-deliverability of sites over the Plan period, **resulting in an assumed capacity of 9,064 units** (See Table 3).

The Housing Growth Study (Technical Supplement 1) provides further detail regarding the proposed housing growth within the Council area. It identifies West Lisburn/Blaris as a key area of future strategic growth which is a priority for

⁵Includes adjustment for lapsed sites

the Council over the Plan period. The future development of the area is supported by the West Lisburn Development Framework Review 2018, which recognises the need for investment in the transport infrastructure to secure its future potential.

It is recommended that future development is proposed to be a mix of housing and employment use. West Lisburn has the capability of delivering a significant number of new homes which would contribute to ensuring the future economic aspirations are aligned with housing growth. This is important in addressing the wider strategic objectives to address the ageing population and help retain and attract younger people to the area and is in addition to the HGI figure provided above.

Based on an assessment of the developable land available at West Lisburn/Blaris, this could provide for additional growth of up to 1,500 dwellings at this location as part of a Strategic Mixed Use Site. Further details are provided under Chapter 4B – SMU01 West Lisburn/Blaris and associated designation. [For the purposes of Table 3, an allowance of 1,350 units has been made for this site.](#)

4. Urban capacity studies: It is a requirement of the SPPS that an Urban Capacity Study (UCS)⁶ informs the LDP. To assist with the identification of land required for new housing over the plan period, an UCS was carried out for the settlements in excess of 5,000 population and identified land that would be suitable for housing and employment within the Urban Footprint.⁷ The study included the urban footprint of Lisburn City, the Castlereagh Greater Urban Area and for completeness the three towns of Carryduff, Moira and Hillsborough & Culcavy.

The UCS identifies that within the Council area approximately 68% of the population reside in the urban areas.

It identifies that approximately 40% of the growth requirement can be accommodated within the urban footprint of settlements. This is less than the RDS requirement to locate 60% of future housing growth within the urban

footprints of settlements in excess of 5,000 population. The reason for this not being met is that the previous Development Plan (BMAP) already zoned a significant number of urban capacity sites for housing. The current definition of the urban footprint does not include committed units on zonings inside the settlement development limits. It should be noted when these are taken into account that over 80% of housing growth can be accommodated within the existing settlements.

The UCS identifies an additional [41 35](#) sites (after applying absolute constraints) equating to a further [975-901](#) units over the Plan period [from 2019](#). This figure has been reduced by 10% due to the possibility of non-deliverability of sites over the Plan period, [resulting in an assumed capacity of 813 units](#) (See Table 3).

It was indicated that higher density development would be appropriate within Lisburn City Centre in the range of 120-160 dwellings per hectare. Beyond the city centre within the existing urban footprint (including the Greater Urban areas and towns) a range of 25-35 dwellings per hectare is considered appropriate, having regard to the existing densities and local character.

It concluded that for the Plan period there was sufficient supply of housing land to accommodate the growth ambitions of the Council.

5. Allowance for windfall housing: Windfall potential is a key element of the UCS. It consists of housing sites that were neither zoned nor anticipated but which could become available over the lifetime of the Plan. An analysis of projected windfall based on historical trends (over a five year period from 2012-2017) identified on average a potential of between 243 units (sites under 5 units) and 1,605 units (sites of more than 5 units) depending on the type, size and density of units proposed. [In order to avoid potential double counting with sites that already benefit from planning permission or urban capacity sites, a windfall allowance is only applied for a ten-year period between 2022 and 2032.](#)

⁶ See Technical Supplement 2 Urban Capacity Study

⁷ The continuous built-up area of the settlement (2012 urban footprint used to align with the RDS HGI figure)

The UCS recommended that a discount rate be applied to both the delivery of identified sites and housing allocations to allow for uncertainty within the market. Based on best practice within other parts of the United Kingdom, this is usually around 10%. Applying this rate suggests that **a total of 1,108 dwellings would be expected to come forward on windfall sites** over the remaining Plan period. **This figure would comprise 145 dwellings on small windfall sites and 963 units on large windfall sites. would be on average between 218 and 1,444 units. These figures have been further revised to ensure there is no double counting of these windfall units during the first 3 years of the Plan.**

6. Housing Needs Assessment/Housing Market Analysis:

The Northern Ireland Housing Executive (NIHE) are responsible for carrying out a Housing Needs Assessment (HNA) to assist the Council in the preparation of the Local Development Plan. The HNA seeks to provide a reasonable mix and balance of housing types to cater for a range of housing needs. The total affordable housing requirement for the plan period is ~~6,240~~ **4,320** units of which 2,400 are social housing units. The deliverability of affordable housing and in particular the social housing element will largely depend on the zoned sites remaining to be developed and other sites lying outside these zonings (urban capacity and windfall). The projected units on these sites over the plan period will facilitate the deliverability of more affordable housing beyond the Council's current housing commitments. Any future identified shortfall may be addressed at LPP Stage through the zoning of land for affordable housing. This will be done in consultation with the NIHE as the statutory housing authority.

The purpose of a Housing Market Analysis (HMA) is to provide evidence in order to develop integrated housing policies and approaches. The HMA identifies Housing Market Areas, defined as a geographical area, where most people live and work. The Housing Growth Study provides a review of the existing housing market for the Lisburn and Castlereagh area. It acknowledges that the Council forms part of the wider Belfast Metropolitan Housing Market Area, and therefore cognisance must be given to housing growth in this market area, and how it could impact on the Council area. In terms of the Housing Market Area, the Council area has a strong housing market with high house prices compared to

other local government districts in Northern Ireland. There is also evidence of affordability concerns.

Providing jobs aligned with future housing is an important consideration for the Council area, to enable future residents to live and work in Lisburn and Castlereagh.

7. Application of a sequential approach and identification of suitable sites for settlements of over 5,000 population: The SPPS identifies a sequential approach for site selection. The first step of the process focuses on land within the existing urban footprint (as informed by the urban capacity study). This includes those sites that are committed within the settlement limits and opportunity for windfall. If housing cannot be accommodated within settlement limits, only then would an extension to a city or town be considered.

The settlement hierarchy has been identified and as such residential development is mainly directed to those settlements. 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.

8. Transport Assessments: The successful integration of transport and land use is essential to the objective of furthering sustainable development. In determining a development proposal likely to generate traffic, the Council may require the developer to submit a Transport Assessment to facilitate the assessment of transport impacts. This may include a Travel Plan that sets out a package of complementary measures to secure the overall delivery of more sustainable travel.⁸

⁸ See Operational Policies Part 2 for details

The allocations provided in the Plan Strategy and subsequent Local Policies Plan will take full account of the integration of land use and transportation. Further detail on the transport measures to be considered in the LDP are set out in Chapter 4F Infrastructure and the accompanying Local Transport Study (DfI) provided in Technical Supplement 8.

Meeting Future Housing Need

The Housing Growth Study states that in order to identify the appropriate level of housing growth in the emerging LDP, the Council should consider whether an adjustment is required to:

- address the housing market conditions in the Council area
- meet a particular identified strategic economic ambition, such as supporting the strategic proposals at West Lisburn/Blaris, particularly given the need to ensure there is alignment between future economic and housing needs
- help address the impact of an ageing population through the provision of a diverse choice of homes in the right location which will attract and retain younger households
- support net in-migration, particularly of a younger economically-active population.

The evidence base concludes that future housing growth for the Plan period identifies affordability as a particular issue, and supporting the need for a percentage-based mixed tenure policy approach will be important for the wider Belfast Housing Market Area.

Jobs led scenarios tested within the Study, indicate that the HGI is largely aligned with the long term past jobs growth. ~~This gives confidence that the level of future growth identified through the updated HGI is appropriate.~~

In terms of housing delivery completions ~~since 2005/6 between 2004/5 and 2018/19~~ have averaged at ~~618-705~~ dwellings per annum. The level of housing growth aligned with the updated revised published HGI would be broadly aligned with the level of past housing delivery and would also support a level of future

jobs growth aligned with past trends. Analysis of the demographic characteristics highlight that the area is projected to experience strong population growth going forward over the Plan period. It is important that the future housing supply meets the needs of the younger working age population to ensure there is a sufficient labour force to support future jobs growth and rebalance the impact of an ageing population, resulting in the need to uplift beyond the demographic baseline.

In terms of housing land supply, when measured against the updated ~~HGI residual requirement~~ figure of ~~10,500~~ 10,816 dwellings between 2019 and 2032 and set against the latest available evidence (as of 31 March ~~2017~~ 2019) there appears to be a healthy supply of housing across the Council area ~~which would cover the Plan period 2017-2032.~~

West Lisburn is a key area of future growth and remains a significant priority for the Council area. Future development of this area is proposed to be a mix of housing and employment uses, which would contribute to ensuring future needs can be met within the Council area and support job growth. The provision for housing at West Lisburn forms part of the supply to meet the identified need over the Plan period. This will be important in addressing the wider strategic objectives to address the aging population and help and retain younger people to the area.

In conclusion ~~after review~~, there is an identified future need for ~~10,500~~ 12,375 dwelling units across the Council area ~~over the LDP period from 2017 to 2032.~~ Taking account of completions between April 2017 and March 2019, the residual requirement is 10,816 dwellings between 2019 and 2032. Currently, when taking account of existing commitments and allowing for strategic housing growth to support the economic proposals at West Lisburn, there is a future potential of ~~11,578~~ 10,414 dwelling units⁹ which ~~closely reflects the overall strategic housing allocation (SHA) of 11,550~~ falls just under the residual housing requirement of 10,816 dwelling units. This level of supply is dependent on the West Lisburn/Blaris strategic site coming forward to ensure deliverability in the longer term. Given the direction of regional policy and guidance to focus housing within

⁹ This figure is net of the 10% non-implementation discount.

existing urban areas, it is acknowledged that it will be important as the LDP moves forward to Local Policies Plan, to consider the future deliverability on all housing sites across the Plan period. [Taking account of urban capacity sites and windfall releases, the expected supply over the remainder of the Plan period is 12,335 dwellings¹⁰.](#)

¹⁰This figure is net of the 10% non-implementation discount.

Table 3: Strategic Housing Allocation over remainder of Plan Period (2019-2032)

Settlement	Potential Units Remaining	Potential Units on Urban Capacity Sites	Windfall Potential 1-4 Units Projected over 10 year period	Windfall Potential 5+ Units Projected over 10 year period	Total Potential
Lisburn City	4,079 (38.8%) 3,757 (34.7%)	607 (5.8%) 553 (5.1%)	97 (1%) 81 (0.7%)	420 (4%) 350 (3.2%)	5,203 (49.6%) 4,741 (43.8%)
Lisburn Greater Urban Area	188 (1.8%) 60 (0.6%)	0	2 (0.01%)	216 (2%) 180 (1.7%)	406 (3.8%) 242 (2.2%)
Castlereagh Greater Urban Area	1,628 (15.5%) 1,359 (12.6%)	103 (1%) 104 (1%)	43 (0.4%) 36 (0.3%)	248 (2.4%) 207 (1.9%)	2,022 (19.3%) 1,706 (15.8%)
Carryduff	1,407 (13.4%) 1,356 (12.5%)	119 (1.1%) 120 (1.1%)	10 (0.09%) 8 (0.1%)	76 (0.8%) 63 (0.6%)	1,612 (15.4%) 1,547 (14.3%)
Hillsborough & Culcavy	421 (4%) 432 (4.0%)	25 (0.2%) 14 (0.1%)	22 (0.2%) 18 (0.2%)	44 (0.4%) 37 (0.3%)	512 (4.9%) 501 (4.6%)
Moira	545 (5.2%) 464 (4.3%)	21 (0.2%) 22 (0.2%)	0	151 (1.4%) 126 (1.2%)	717 (6.8%) 612 (5.7%)
Urban Settlement Total	8,268 (78.7%) 7,428 (68.7%)	813 (7.5%)	145 (1.3%)	963 (8.9%)	10,472 (99.8%) 9,349 (86.4%)
Villages & Small Settlements	1,231 (11.7%) 1,004 (9.3%)				1,231 (11.7%) 1,004 (9.3%)
Countryside	729 (6.9%) 632 (5.8%)				729 (6.9%) 632 (5.8%)
Total Units	10,228 (97.4%) 9,064 (83.8%)	875 (8.3%) 813 (7.5%)	174 (1.7%) 145 (1.3%)	1,155 (11%) 963 (8.9%)	12,432 (118.4%) 10,985 (101.6%)
Strategic Mixed Use site West Lisburn/Blaris	1,350 (12.9%) (12.5%)				1,350 (14.2%) (12.5%)
Total no of units	11,578 10,414	12,453 11,227	12,627 11,372	13,782 12,335	13,782 12,335
Total % of HGI-residual housing requirement (10,816)	110.3% 96.3%	118.6% 103.8%	120.3% 105.1%	131.3% 114%	131.3% 114%

Figures in brackets taken as a percentage of 10,500 HGI figure taken from Housing Growth Study-residual housing requirement (10,816). Note that some percentages may not sum due to rounding.

Villages and small settlements based on Housing Policy Areas and committed sites with planning permission.

Countryside based on building control completion notices ~~over 5 years between 2012/13 and 2016/17~~ at an average of 54 dwellings per annum projected (excludes replacement dwellings).

All figures have been reduced by 10% to take account of the potential non deliverability during plan period.

**Lisburn and Castlereagh City
Council LDP 2032
Addendum to Housing Growth
Study**

Lisburn and Castlereagh City Council

November 2020

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1.0 Introduction

- 1.1 This Addendum to Technical Supplement 1 Housing Growth Study addresses the issues associated with the housing need figure contained in the draft Plan Strategy. Strategic Policy SP08 identifies a baseline future growth figure of 692dpa over the Plan period from 2017 to 2032. This has been rounded to 700dpa and equates to 10,500 dwellings over the 15-year period.
- 1.2 This housing requirement figure was based on the Housing Growth Study (HGS) which was prepared by Lichfields and published with the draft Plan Strategy (dated September 2019). Whilst the HGS drew on the latest 2016-based NISRA population and household projections, it was prepared prior to the publication of the latest (2016-based) Housing Growth Indicators (HGIs). It sought to update the HGI, taking account of the 2016-based house projections but retaining the adjustments for second homes, vacant stock and conversions, closures and demolitions, as identified in the HGI 2012 methodology note.
- 1.3 Using the PopGroup suite of software, the HGS considered a number of alternative scenarios. The housing requirement figures arising from each scenario is set out below:

Table 1.1 Summary of scenarios tested by the HGS

Scenario	Household change 2017-32	Dwelling requirement 2017-32)
A: 2016-baseline	8,720 (581pa)	9,100 (605dpa)
B: Updated HGI	-	10,380 (692dpa)
C: OE baseline (307 jobs pa)	6,230 (451pa)	6,490 (433dpa)
D: Jobs-led long term past trends (651 jobs pa)	10,345 (690pa)	10,775 (718dpa)
E: Jobs-led short term past trends (442 jobs pa)	8,602 (573pa)	8,960 (597dpa)

Source: LCCC Housing Growth Study

- 1.4 The HGS recommended that the amended HGI figure of 692dpa represented a robust housing requirement for the emerging LDP period to 2032.

2.0 Updated HGIs

2.1 The Department for Infrastructure published the revised HGIs in September 2019. These covered the period from 2016 to 2030 and identified a total need of 10,700 for LCCC (713dpa) over this 15-year period¹.

2.2 The period covered by the latest HGIs do not coincide with the period of the emerging LDP (2017-2032). It has therefore been necessary to update the publicised HGIs to take account of the projected number of households in 2032 and the housing stock in 2017. In adjusting the figures for second homes and vacant stock, we have retained the same proportionate share of expected dwellings at the end of the period as per the latest HGIs:

- 1 Second homes: HGIs anticipate 400 second homes in 2030; this equates to 0.59% of the total number of dwellings in 2030 (2030 household plus second homes plus vacant dwellings = 67,400).
- 2 Vacant dwellings: HGIs anticipate 3,700 vacant homes in 2030; this equates to 5.5% of the total number of dwellings in 2030 (2030 household plus second homes plus vacant dwellings = 67,400).

2.3 As detailed in Table 2, the implication of this adjustment is a requirement for 10,845 dwellings over the LDP Period from 2017 to 2032, equivalent to 723dpa.

2.4 This slightly lower figure than the official HGI requirement of 10,700 dwellings can be understood by reference to the following:

- 1 A difference of 946 in the dwelling stock figure for the first year for which data is available (2016: 58,000; 2017: 58,946).
- 2 A difference of 1,091 in the dwelling stock estimate for at the end of the assessment period (2030: 68,700; 2032: 69,791), based on:
 - A difference of 1,008 in the household projection for the final year of assessment (2030: 63,500; 2032: 64,508); and,
 - A difference of 83 in the total adjustment applied for second homes and vacant stock.
- 3 Resulting in a difference of 145 in the projected dwelling requirement over the study period (10dpa).

2.5 It should also be noted that the 2016 HGI figures are rounded to the nearest 100 and so some further differences might have arisen as a result of rounding.

¹ The Department for Infrastructure has confirmed that the HGIs relate to the period from 1 January 2016 to 31 December 2030 – a full 15 years.

Table 2.1 Adjustment to 2016-based HGI to reflect LCCC LDP period

	1	2	3	4	5	6	7
	No h'holds at end of period	2nd homes	Vacant stock	Conversions etc	New stock est at end of period	Housing stock at start of period	New dwg req
2016-30	63,500	400	3,700	1,100	68,700	58,000	10,700 (713dpa)
Source/ Calculation	2016-based NISRA h'hold projections	See above		73.3 per annum	1 + 2 + 3 + 4	LPS NI Housing Stock publication	5 - 6
2017-32	64,508	405	3,778	1,100	69,791	58,946	10,845 (723dpa)

Source: 2016-based HGIs / Lichfields analysis

3.0 Updates to other scenarios

- 3.1 The PopGroup analysis that informed the alternative scenarios in the HGS has also been updated to reflect the latest data in respect of the conversion from households to dwellings. The results of this analysis are set out below in respect of Scenarios D and E:

Table 3.1 Updated employment-led dwelling requirement

Scenario	PopGroup output		Net dwelling requirement (2017-32)
	Household change (2017-32)	Gross dwelling requirement (2017-32)	
D: Jobs-led long term past trends (651 jobs pa)	10,345 (690pa)	11,016 (734dpa)	12,116 (808dpa)
E: Jobs-led short term past trends (442 jobs pa)	8,602 (573pa)	9,160 (610dpa)	10,260 (684dpa)

Source: Lichfields analysis

- 3.2 These are gross figures and so do not align with the HGI figure which take account of net conversions, closures and demolitions. Adding an allowance of 73dpa (1,100 over the Plan period) to the figures above result in a net figure of 684dpa for the short-term scenario and 808dpa for the long-term scenario. The mid-point between these figures (746dpa) is very closely aligned with the revised HGI figure (a difference of 3.2%). The mid-point between the two past trend job figures is 547 per annum. This is closely aligned with the average level of employment growth between 1997 and 2017 (554 jobs per annum).
- 3.3 It is important to ensure that a shortage of future housing delivery does not act as a constraint to economic growth. To this end, the alignment of housing and employment growth will play a significant role in contributing to balanced growth and balanced communities.

4.0 **Adjustments to baseline housing requirement**

4.1 Having recommended a baseline housing requirement figure of 692dpa, the HGS stated at paragraphs 9.2 and 9.3:

“It is appropriate to consider whether the actual housing need going forward is higher than the minimum figure identified by the household projections.

“In order to identify the appropriate level of future housing growth in the emerging Local Development Plan, LCCC should give consideration to whether an upward adjustment is required...”

Flexibility margin

4.2 In response to this, the draft Plan Strategy states at page 58 that:

“There is a requirement for the Council to ensure that the identified HGI figure can be met. A buffer of 10% over-supply has been applied to the HGI baseline figure which takes into consideration the possibility that an element of the identified potential might not come forward during the plan period.”

4.3 The inclusion of a flexibility margin is an important planning tool that will ensure that the housing requirement can be met even in the event that some sites do not come forward at the expected rate. This will protect the Council against proposals for development on sites that do not accord with the Plan strategy and will ensure that its vision for growth can be achieved.

4.4 Although other Local Government Districts in Northern Ireland are not currently proposing any such flexibility margin, this approach is widely used elsewhere in the UK. Most notably, Scottish Planning Policy (2014) requires the inclusion of a flexibility margin within housing policies contained in all development plans. Paragraph 116 states:

“Within the overall housing supply target, plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan.”

4.5 In Wales, the Local Development Plan Manual (2020) also requires the inclusion of a flexibility margin. Paragraph 5.59 states:

*“It will be extremely rare that all sites identified in a plan will come forward in the timescale anticipated. Whilst there is a need to improve certainty through frontloading, as described earlier in the Manual, there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites. A development plan will not be effective if it cannot accommodate changing circumstances. **This means that a flexibility allowance must be embedded into the plan.** The plan will need to evidence there is sufficient flexibility above the requirement to account for non-delivery and unforeseen issues ... The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced. The policy framework in the plan should be clear regarding the housing requirement, provision, and flexibility allowance. The level of flexibility chosen by the LPA when the plan goes on deposit is broadly maintained upon adoption of the plan.”*

4.6

We also identified the following sample of local authorities in England and Wales that have included a flexibility margin. Whilst not seeking to provide a comprehensive overview of the housing policies contained within all English and Welsh development plans, it does demonstrate how this approach has been widely used by local authorities.

Table 4.1 Review of flexibility margin applied by local authorities in England and Wales

Local authority area	Housing requirement	Housing provision	Uplift	Margin
Babergh	5,975	6,570	595	10.0%
Bolton	8,670	10,410	1,740	20.0%
Blaenau Gwent	3,500	3,907	407	11.6%
Caerphilly	8,625	10,269	1,644	19.0%
Calderdale (at examination)	4,200	5,040	840	20.0%
Cardiff	41,415	45,415	4,000	9.6%
Carlisle	9,606	11,460	1,854	19.3%
Conwy	6,520	7,170	650	10.0%
Cotswold	8,400	9,614	1,214	14.5%
Cheltenham, Gloucester and Tewkesbury (Joint Core Strategy)	33,500	35,175	1,675	5.0%
Chichester	6,879	7,282	403	5.9%
Guildford	10,678	14,602	3,924	36.7%
Havant	6,300	6,974	674	10.7%
Kirklees	31,140	32,739	1599	5.1%
Melton	6,125	7,316	1191	19.4%
Merthyr Tydfil	2,250	2,821	571	25.4%
Milton Keynes	26,500	28,182	1682	6.3%
Monmouthshire	4,500	4,950	450	10.0%
Neath Port Talbot	7,800	8,760	960	12.3%
Newport	10,350	11,623	1,273	12.3%
Pembrokeshire	5,700	7,300	1,600	28.1%
Powys	4,500	5,588	1,088	24.2%
Swansea	15,600	17,645	2,045	13.1%
Torfaen	4,700	5,740	1,040	22.1%
Vale of Glamorgan	9,460	10,408	948	10.0%

Source: Lichfields analysis

- 4.7 The average margin applied in these 25 development plan examples is 12.0%.
- 4.8 We also note that the English government's proposed changes to the Standard Methodology for Assessing Local Housing Need identifies a total requirement for 338,000dpa across England. This represents a 12.7% margin over the government's stated target of 300,000dpa.
- 4.9 This evidence demonstrates the extent to which a flexibility margin represents a valuable and widely used tool that contributes towards the effective planning for future housing development in order to ensure that identified needs can be met. It will similarly play an important role in ensuring that the identified housing requirement for Lisburn and Castlereagh can be delivered over the LDP period. It will also ensure that the Plan will be sufficiently flexible to respond to changing circumstances that may occur over time, as required by the Test of Soundness CE4 (coherence and effectiveness test).

5.0 Conclusion

- 5.1 This analysis has identified a clear alignment between the 2016-based HGIs (as amended to reflect the LDP period), the updated employment-led scenarios, and past housing completions between 2005 and 2019. This alignment is important. It adds to the weight that can be placed on the recommended housing requirement figure and avoids undue reliance from being placed on any single source. The reliance on the multiple sources of data and modelling is also important given that HGIs are policy neutral indicators of what might happen if recent trends continue in the future.
- 5.2 Drawing on this updated analysis, we recommend that housing requirement for the LDP period should be increased to 11,250 (750dpa²). A 10% flexibility margin should be applied to this figure, resulting in a requirement for 12,375 dwellings over the LDP period from 2017 to 2032.
- 5.3 A total of 1,559 dwellings were completed between April 2017 and March 2019. As such, the remaining housing need that is to be met over the remainder of the Plan period to 2032 equates to 10,816 dwellings.

² Rounded from 746dpa

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