

**BY EMAIL AND POST**10<sup>th</sup> January 2020

Our Ref: C04301

LISBURN & CASTLEREAGH CITY COUNCIL  
 Local Planning Office  
 Lagan Valley Island  
 Island Civic Centre  
 The Island  
 Lisburn  
 BT27 4RL



Dear Sir/Madam,

**Re: Lisburn and Castlereagh City Council Local Development Plan – Response to the Draft Plan Strategy relating to lands located on Crossnacreevy Road, Crossnacreevy**

This letter is submitted on behalf of our client Fraser Houses Ltd and relates to the publication of the Lisburn and Castlereagh City Council draft Plan Strategy, which was launched by the Council on Friday 11<sup>th</sup> October 2019. It highlights how some draft policies are not sound and proposes how such policies could be amended to become sound. In addition to this we draw your attention to specific lands that we have identified as being suitable for housing in order to contribute towards meeting the housing need for the district as set out in the strategy.

Development Plan Practice Note 6 sets out 3 main tests of soundness for Local Development Plans, with each test having a number of criteria, as follows:

**Procedural Tests**

- P1 Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?*
- P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?*
- P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?*
- P4 Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?*

**Consistency Tests**

- C1 Did the council take account of the Regional Development Strategy?*
- C2 Did the council take account of its Community Plan?*
- C3 Did the council take account of policy and guidance issued by the Department?*

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

#### Coherence and Effectiveness Tests

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

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

CE3 *There are clear mechanisms for implementation and monitoring; and*

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

### Lisburn and Castlereagh City Council Local Development Plan - Part 1 Plan Strategy

#### **Lisburn and Castlereagh City Council Vision**

##### **The LDP Vision**

The Local Development Plan (LDP) will respond to the needs of the community in providing a sustainable economy, society and environment. It will support a thriving, vibrant and connected place in which people live, work, visit and invest; and an attractive, green and quality place which will enhance the wellbeing and quality of life for all.

We **support** this vision as it reflects the Council aspirations for the area to have a sustainable economy, society and environment that meets the needs of the community over the plan period. This is an important part of fostering healthy sustainable communities and delivering successful thriving, vibrant and connected places. It also sets out that wellbeing and quality of life is also important, making the Council area a better place in which to live, work, visit and invest over the plan period.

#### **Strategic Objectives**

Six plan objectives have been developed to deliver the vision for the Local Development Plan. The six objectives set out the aims of the LDP and what it seeks to achieve over the 15-year plan period. These include an appropriate balance between improving quality of life, economic prosperity for all, the protection of the Council's environmental assets, and to ensure that development is sustainable in the interests of future generations.

The plan objectives aim to link directly and are implemented through the strategic policies and spatial strategy detailed in Chapter 4 and operational policies contained in Part 2 of the Plan Strategy.

These objectives are:

- A: A Quality Place
- B: A Thriving Place
- C: A Vibrant Place
- D: An Attractive Place
- E: A Green Place
- F: A Connected Place

We are **generally supportive** of these objectives in principle. Further discussion on the relevant strategic policies are discussed in detail below.

### **Spatial Strategy**

We are **generally supportive** of the Spatial Strategy below, specifically, the criterion to support the growth and regeneration of our city, towns and villages, sustaining a living and working countryside and protecting environmentally sensitive areas. However, the role of small settlements (such as Crossnacreevy) should be considered as providing opportunities for housing of an appropriate scale and character to individual settlements.

- *support the growth and regeneration of our city, towns and villages, sustaining a living and working countryside and protecting environmentally sensitive areas*
- *provide a settlement hierarchy, defining development limits and allocating land for housing growth in accordance with the sequential approach of the RDS*
- *encourage good design and positive place-making creating places in which people want to live, work, visit and explore*
- *allocate employment land to provide an adequate and continuous supply, taking account of accessibility to major transport routes and proximity to sustainable locations near large centres of population*
- *identify, define and designate land for retailing, recreation, education or community facilities where appropriate*
- *identify, protect and enhance our historic and natural heritage environment, promote green and blue infrastructure and ecological networks*
- *accommodate sustainable development in the countryside in accordance with prevailing regional planning policy*
- *provide key site requirements where required to achieve good quality development that is reflective of the context within which it is set*
- *promote, influence and deliver a shift to more sustainable travel modes and integrated land use proposals in accordance with the regional transportation policy, promoting reduced reliance on the private car.*

## Strategic Policy 01 'Sustainable Development'

### Strategic Policy 01 Sustainable Development

The Plan will support development proposals which further sustainable development including facilitating sustainable housing growth; promoting balanced economic growth; protecting and enhancing the historic and natural environment; mitigating and adapting to climate change and supporting sustainable infrastructure.

We support Strategic Policy 01 as sustainable development is imperative. The Council should seek to support the provision of jobs, services, and economic growth; and delivery of homes to meet the full range of housing needs integrated with sustainable infrastructure, whilst recognising the balance to be achieved in protecting environmental assets.

## Strategic Policy 07 'Section 76 Planning Agreements'

### Strategic Policy 07 Section 76 Planning Agreements

Development will be required to deliver more sustainable communities by providing, or making contributions to, local and regional infrastructure in proportion to its scale, impact of the development and the sustainability of its location.

A developer will be expected to provide or contribute to the following infrastructure in order to mitigate any negative consequences of development:

- a) improvements to the transport network, including walking and cycling routes, public transport or, where necessary appropriate parking provision
- b) affordable housing
- c) educational facilities and/or their upgrades
- d) outdoor recreation
- e) protection, enhancement and management of the natural and historic environment
- f) community facilities and/or their upgrades
- g) improvements to the public realm
- h) service and utilities infrastructure
- i) recycling and waste facilities.

It is acknowledged that planning agreements under Section 76 of the Planning Act can be used to address issues to the granting of planning permission where these cannot be addressed using appropriate planning conditions.

Whilst this is a strategic policy, we disagree with this policy and believe it is too broad and does not set out robust evidence or methods for how the planning agreements will be used. Furthermore, appropriate guidance should be published on when a planning obligation should be used setting out the appropriate tests.

It is important that planning obligations meet the appropriate tests to be used in that it is necessary to make the development acceptable in planning terms, directly related to the development; and fairly and reasonably related in scale and kind to the development.

We disagree specifically to the inclusion of affordable housing within the policy, we consider that Section 76 agreements are unduly onerous and time consuming to put in place and therefore increases

the timelines involved in the delivery of affordable housing. A planning condition is a more appropriate and efficient means of securing the delivery of affordable housing on sites.

Planning agreements should also be balanced against delivery of development and development viability. Where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled.

#### Soundness Test

- Strategic Policy 7 (SP7) is not sound as it is not reasonably flexible to enable it to deal with changing circumstances and it is not based on a robust evidence base (Test CE2).

#### Remedy

- Revise SP7 to remove affordable housing and include policy tests for when planning obligations should be used. Supplementary Planning guidance should also be published so that financial contributions can be suitably quantified if necessary.

### **Strategic Policy O8 Housing in Settlements**

**The Plan will support development proposals that:**

- a) are in accordance with the Strategic Housing Allocation provided in Table 3**
- b) facilitate new residential development which respects the surrounding context and promotes high quality design within settlements**
- c) promote balanced local communities with a mixture of house types of different size and tenure including affordable and specialised housing**
- d) encourage compact urban forms and appropriate densities while protecting the quality of the urban environment.**

Strategic Policy O8 sets out to ensure that housing in settlements can provide sufficient capacity for accommodating future housing growth. Whilst we support criteria b, c and d above. We **disagree** with the proposed Strategic Housing Allocation figures set out within Table 3.

The Council consider that in terms of housing land supply, when measured against the updated HGI figure of 10,500 and set against the latest available evidence (as of 31 March 2017) there appears to be a healthy supply of housing across the Council area which would cover the Plan period 2017-2032.

In regard to table 3 below, the Council consider that there is an identified future need for **10,500 dwelling units** across the Council area. Currently, when taking account of existing commitments and allowing for strategic housing growth to support the economic proposals at West Lisburn, the Council believe there is a future potential of **11,578** dwelling units which closely reflects the overall strategic housing allocation (SHA) of **11,550** dwelling units. The Council suggest that allocation plus potential units from 'Urban Capacity Sites' and 'Windfall Potential' amounts to 13,782 potential units within the Council Area.

It is noted that 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 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.

Table 3 Strategic Housing Allocation over Plan Period

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

Figures in brackets taken as percentage of 10,500 HGI figure taken from Housing Growth Study  
 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 at an average of 54 Dwellings per year projected (excludes replacement dwellings)  
 All figures have been reduced by 10% to take account of the potential non deliverability during plan period

The Strategic Housing Provision does not set a specific allocation to Crossnacreevy but allocates to the housing provision to a category of 'Villages and Small Settlements'. The Council suggest that there are **1,231** potential units remaining (11.7% of strategic housing allocation for the borough) within villages and small settlements. In total, there are 49 villages and small settlements identified in the settlement hierarchy that would need to share this allocation.

It is our opinion that the Councils approach to housing growth projections is based on too short a review period. A suggested alternative approach that is considered more appropriate is to base the overall housing growth figure on a longer period of growth, from 1998 to 2013, which includes both pre and post-recession build out rates and provides a clearer indication of the probable growth over a 14.5 year period. A total number of 11,540 dwellings were built over a 14.5-year period from December 1998 to July 2013, with an average annual build out rate to be 796 dwellings per year.

Using this data to calculate the predicted growth over the plan period plus a five-year supply, results in a housing growth figure of 15,920 units. In addition to this, a further 1,592 units (10%) to accommodate further anticipated growth should be added, to ensure that any shortfall in housing land does not occur over the plan period. It is acknowledged within the draft Plan Strategy that the Council forms part of the wider Belfast Metropolitan Area, and therefore cognisance must be given to housing growth in this market area, and how it could impact on the Council Area.

We feel that adding a further 10% is necessary due to the ambitious economic growth plans of the neighbouring council areas of Belfast and Antrim & Newtownabbey. Belfast in particular seeks to create a further 46,000 jobs over the period of 2020-2035, and whilst this predicted economic growth will see an increase in population within the Belfast City Council area, it is inevitable that this will have a knock-on effect, in terms of housing demand, on neighbouring Councils areas that also contribute commuters to Belfast, such as Lisburn and Castlereagh.

In addition to this, Lisburn and Castlereagh Council Area shares boundaries with other Councils, such as Ards and North Down, Armagh, Banbridge and Craigavon and Newry Mourne and Down. Therefore, there will ultimately be a host of inter-relationships between these Council Areas, with people travelling across boundaries for work, for leisure etc. As such, Lisburn and Castlereagh housing growth projections should take cognisance of the plans of all of these neighbouring Councils.

Such an approach is necessary and in line with statutory requirements under section 3(4) and 3 (5) of the Planning Act 2011, which requires Councils to consider how the plans of neighbouring districts may affect the Councils, own plans.

A further 2400 units should also be added to the housing growth figures, in line with Lisburn and Castlereagh Councils ambitious plans to develop 80ha of land at Blaris for residential development, which would yield approximately 2400 units, not 1,350 as identified within the allocation table. The 2400 figure is set out within the West Lisburn Development Framework Document.

Finally, a further 2,400 social units will need to be added to the figure, that are predicted to be required within the Council area throughout the plan period.

The draft Plan Strategy housing allocation column is based on the Councils identified 'Total Potential' within Table 3 'Strategic Housing Allocation over Plan Period' on page 64 of the draft Plan Strategy. However, we consider that this is not a true reflection of the total potential within the Council Area as Urban Capacity Sites and Windfall figures should be discounted given their speculative nature and as a result, they cannot be relied upon for housing delivery. It is noted that windfall potential is a key element of the Urban Capacity Study therefore an element of double counting may have also taken place.

Furthermore, it is suggested that the delivery of affordable housing (6,240 total requirement) and in particular social housing (2,400 requirement) will largely depend on the zoned sites remaining to be developed and other sites lying outside these zonings (urban capacity and windfall). This is unacceptable given that these sites cannot be relied upon for housing delivery, therefore social housing has not been provided for.

The table below sets out the draft Plan Strategy Allocation, the corrected potential remaining units (removing speculative urban capacity sites and windfall potential) and our suggested housing allocation which the Council should take account of.

| Tier   | Settlement                     | Draft Plan Strategy Housing Allocation | Corrected Potential Remaining Units | Suggested Housing Allocation                         |
|--|--------------------------------|--|-------------------------------------|--|
| City   | Lisburn                        | 5203 (49.6%)                           | 4,079                               | 5,974 - 30%  |
| Lisburn Greater Urban Area                   | Lisburn Greater Urban Area     | 406 (3.8%)                             | 188                                 | 796 - 4%   |
| Castlereagh Greater Urban Area               | Castlereagh Greater Urban Area | 2,022 (19.3%)                          | 1628                                | 4,182 - 21%  |
|  |                                |  |                                     |  |
| Towns  | Carryduff                      | 1612 (15.4%)                           | 1407                                | 3,982 - 20%  |
|  | Hillsborough & Culcavy         | 512 (4.9%)                             | 421                                 | 996 - 5%   |
|  | Moira                          | 717 (6.8%)                             | 545                                 | 996 - 5%   |
|  |                                |  |                                     |  |
| Villages and Small Settlements               |                                | 1,231 (11.7%)                          | 1231                                | Villages: 2,389 - 12%<br>Small Settlements: 597 - 3% |
|  |                                |  |                                     |  |
| Countryside                                  |                                | 729 (6.9%)                             | 729                                 | 0%   |
|  |                                |  |                                     |  |
| Total  |                                | 12,432                                 | 10,228                              | 19,912   |
| Strategic Mixed-Use site West Lisburn/Blaris |                                | 1350 (12.9%)                           | 2,400                               | 2,400  |
|  |                                |  |                                     |  |
|  | Overall Total                  | 13,782                                 | 12,628                              | 22,312   |
|  |                                |  |                                     |  |

Taking all the above into consideration, we believe the overall suggested Housing Growth figure for the Council area over the new plan period should be **22,312** dwellings, broken down as follows:

- **Revised HGI figure of 15,920 (based on 1998-2013 build out rates); +**
- **1,592 (a 10% uplift to ensure no shortfall in supply and account for neighbouring Council's growth plans); +**
- **2,400 units as proposed for the Blaris lands in the West Lisburn Development Framework Plan; +**
- **2,400 social housing need over the plan period, as set out in the dPS.**



This housing allocation, while higher than the HGI figure, will provide greater flexibility in the plan as opposed to the Councils housing allocation, of basing their figures on the Housing Growth Indicators for Northern Ireland which are purely “indicators” and only provide an estimate of the new dwelling requirement for the Region.

Based on our suggested growth allocation above, which apportions 3% of the overall housing allocation figure to the small settlements and distributes this allocation based on population, 48 new dwellings will be required within Crossnacreevy within the next plan period.

#### Soundness Test

- Strategic Policy 08 (SP08) is not sound as it is not reasonably flexible to enable it to deal with changing circumstances i.e. unexpected growth (Test CE4) and it is not based on a robust evidence base (Test CE2). The projected housing growth underestimates the housing need for the district over the plan period, as detailed above.

#### Remedy

- Revise SP08 to update the housing growth figure to provide 22,312 new homes within the district by 2032.

### **Appendix D Evaluation of Settlement Characteristics**

Crossnacreevy is identified as one of 33 small settlements in the Council Area. Appendix D sets out that small settlements act as a focal point for the rural community and take the form of a rural cluster or crossroads development where consolidation of the built form can provide opportunity for individual dwellings and/or small groups of houses and small rural businesses. It is stated that there are mostly infill and small-scale opportunities available for housing and other opportunities to sustain rural communities without changing the character of these settlements.

### **Lisburn and Castlereagh City Council Local Development Plan - Part 2 Operational Policies**

#### **Policy HOU1 ‘New Residential Development’**

##### **HOU1 New Residential Development**

Planning permission will be granted for new residential development in settlements in the following circumstances:

- a) on land zoned for residential use
- b) on previously developed land (brownfield sites)
- c) in designated city, town centres, villages and small settlements
- d) living over the shop schemes within designated city and town centres, or as part of mixed use development.

The above policy applies to all residential uses as set out in Part C of the Schedule to the Planning (Use Classes) Order (Northern Ireland) 2015 (or as amended).

We support Policy HOU1, specifically criterion (c) which states that planning permission will be granted for new development in settlements in designated city, town centres, villages and small

settlements. It is encouraging that small settlements have been identified as suitable locations for new residential development. As stated above small settlements act as a focal point for the rural community and take the form of a rural cluster or crossroads development where consolidation of the built form can provide opportunity for individual dwellings and/or small groups of houses and small rural businesses.

## Policy HOU3 'Site Context and Characteristics of New Residential Development'

### HOU3 Site Context and Characteristics of New Residential Development

Planning permission will be granted for new residential development where it will create a quality and sustainable residential environment which respects the existing site context and characteristics. An overall design concept, in accordance with Policy HOU6 must be submitted for all residential proposals and must demonstrate that a proposal draws upon the positive aspects of, and respects the local character, appearance and environmental quality of the surrounding area.

Proposals for residential development will be expected to conform to all the following criteria:

- a) the development respects the surrounding context, by creating or enhancing a local identity and distinctiveness that reinforces a sense of place, and is appropriate to the character and topography of the site in terms of layout, scale, proportions, massing and appearance of buildings, structures and landscaped and hard surfaced areas
- b) archaeological, historic environment and landscape characteristics/features are identified and, where appropriate, protected and suitably integrated into the overall design and layout of the development.

For new residential development in areas of distinctive townscape character, including Conservation Areas and Areas of Townscape or Village Character, an increased residential density will only be allowed in exceptional circumstances and space standards should be in accordance with published Departmental guidance.<sup>1</sup>

We support Policy HOU3, as it is important to provide attractive and sustainable residential development with a high quality of design, layout and landscaping. Each proposal for residential development should be based on a clear design concept.

## Policy HOU4 'Design in New Residential Development'

### HOU4 Design in New Residential Development

Proposals for residential development will be expected to conform to all the following design criteria:

- a) the design of the development must draw upon the best local architectural form, materials and detailing
- b) landscaped areas using appropriate locally characteristic or indigenous species and private open space must form an integral part of a proposal's open space and where appropriate will be required along site boundaries to soften the visual impact of the development and assist in its integration with the surrounding area

- g) a proposed site layout must indicate safe and convenient access through provision of walking and cycling infrastructure, both within the development and linking to existing or planned networks; meet the needs of mobility impaired persons; and respect existing public rights of way
- h) adequate and appropriate provision is made for car and bicycle parking including where possible electric vehicle charging points
- i) the design and layout must not create conflict with adjacent land uses and there is no unacceptable adverse effect on existing or proposed properties in terms of overlooking, loss of light, overshadowing, noise or other disturbance
- j) the design and layout should where possible include use of permeable paving and sustainable drainage

- c) where identified as a Key Site Requirement adequate provision is made for necessary local community facilities, to be provided by the developer
- d) residential development should be brought forward in line with the following density bands:<sup>2</sup>
  - City Centre Boundary 120-160 dwellings per hectare
  - Town centres and greater urban areas 25-35 dwellings per hectare
  - Villages and small settlements 20-25 dwellings per hectare.
- e) a range of dwellings should be proposed that are accessible and adaptable in their design to provide an appropriate standard of access for all. The design of dwellings should ensure they are capable of adaption to provide accommodation that is wheelchair useable for those in society who are mobility impaired. A range of dwelling types and designs should be provided to prevent members of society from becoming socially excluded
- f) dwellings should be designed to be energy and resource efficient and, where practical should include integrated renewable energy technologies to minimise their impact on the environment

- k) the design and layout design must demonstrate appropriate provision is made for householder waste storage and its collection can be facilitated without impairment to the access and manoeuvrability of waste service vehicles
- l) the development is designed to deter crime and promote personal safety.

Any proposal for residential development which fails to produce an appropriate quality of design will not be permitted, even on land identified for residential use in a development plan.

We are **generally supportive** of Policy HOU3 with the exception of criterion (d) and (e).

In regard to criterion (d), prescriptive density bands should not be set within policy given that density should take into account specific local context, design, residential quality and transport links. These are all important considerations in determining whether the proposed density is acceptable.

The above density bands could potentially be used as a guide within supplementary planning guidance but should not be used within policy as they can limit the development potential of proposals within the relevant settlement areas.

Where the high density does not manifest itself in any unacceptable impacts in terms of design, residential quality, views, Conservation Areas/Areas of Townscape Character/Areas of Village Character or transport impacts, the proposed density should be considered acceptable.

In regard to criterion (e), it is considered that design standards should be incorporated to provide for 'Lifetime Homes' which meet the varying needs of occupiers and are easily capable of accommodating adaptations. Developers should ensure that a range of dwelling sizes (including internal layout and the number of bedrooms) is provided to meet a range of housing needs that facilitate integration and the development of mixed communities.

Whilst some of the Lifetime Homes standards are included in technical booklet Part R of the Building Regulations (Northern Ireland) 2012, many are not. This policy seeks to address those elements of the standards that can be adequately addressed through the planning system. The policy will apply more to new dwellings provided through the private sector as the requirement for Housing Associations to build to the Lifetime Home standards has applied in NI since 1998 and is set out in the DfC Housing Association Guide (HAG).

Although, we support the Lifetime Homes approach, we do not think it should be a planning requirement. In England for example, the Lifetime Homes Standard was once a planning requirement, however, it has since been abolished and built into updated Building Regulations (Requirement M4(2) and/or M4(3)). We believe the same approach should be taken here within Northern Ireland. Lifetime Homes would also create yet another design challenge at planning application stage which may not be achievable on all sites, specifically those which are constrained in terms of size.

#### Soundness Test

- Policy HOU4 is not sound as it is not based on a robust evidence base (Test CE2) and at planning stage mechanisms for monitoring of building to the lifetime homes standard is not clear (Test CE3)

#### Remedy

- Revise HOU4 to remove reference to density bands and also remove lifetime homes as a planning requirement and ensure it is brought forward under the authority of Building Regulations.

## Policy HOU10 'Affordable Housing in Settlements'

### HOU10 Affordable Housing in Settlements

Where the need for Affordable Housing is identified, through the Housing Needs Assessment<sup>1)</sup>, on sites of more than 0.5 hectares or comprising of 5 residential units or more, proposals will only be permitted where provision is made for a minimum 20% of all units to be affordable. This provision will be secured and agreed through a Section 76 Planning Agreement.

All developments incorporating affordable housing should be designed to integrate with the overall scheme with no significant distinguishable design differences, in accordance with any other relevant policies contained within this Plan Strategy.

In exceptional circumstances where it is demonstrated that the affordable housing requirement cannot be met, alternative provision must be made by the applicant, or an appropriate financial contribution in lieu must be agreed through a Section 76 Planning Agreement. Such agreements must contribute to the objective of creating mixed and balanced communities.

Proposals for the provision of specialist accommodation for a group of people with specific needs (such as purpose built accommodation for the elderly, Policy HOU11) will not be subject to the requirements of this policy.

Windfall sites will be encouraged for the development of affordable housing in suitable and accessible locations.

By exception, proposals for affordable housing could be permitted on land identified as open space, in accordance with Policy OS1, where it can be demonstrated that all of the following criteria have been met:

- a) a demonstrable need has been identified by the Northern Ireland Housing Executive
- b) the application is made by a registered Housing Association
- c) the proposal will bring substantial community benefits that decisively outweigh the loss of the open space.

Development proposals will not be supported where lands have been artificially divided for the purposes of circumventing this policy requirement.

Whilst we support the delivery of affordable homes in the Council Area and welcome the similar to the approach used in the Northern Area Plan 2016 in NIHE identifying need; we **disagree** with the threshold set that sites of more than 0.5ha or comprising 5 residential units or more should provide 20% affordable housing. We consider that the threshold for affordable housing should be introduced once the proposals meet or exceed the 'major residential development' threshold comprising 50 residential units or more or sites of 1ha or more. Setting the provision of affordable housing threshold to major developments is also an approach which has been widely used in England.

The current thresholds are extremely low and the provision of social housing dwellings on small-scale development sites will render many unviable; resulting in a significant decline in small scale housing developments. Furthermore, the SPPS clearly indicates that affordable housing is a matter to be addressed through: "...zoning land or by indicating, through key site requirements, where a proportion of a site may be required for social/affordable housing". The zoning of land and key site requirements are all matters for the Local Policies Plan and not the Plan Strategy Document.

We also **disagree** with the above comment that section 76 planning agreements are the appropriate means to secure affordable housing provision. Section 76 agreements are unduly onerous and time consuming to put in place and therefore increases the timelines involved in the delivery of affordable housing. A planning condition is a more appropriate and efficient means of securing the delivery of affordable housing on sites.

### Soundness Test

- Policy HOU10 is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) and it is not based on a robust evidence base (Test CE2).

### Remedy

- Revise HOU10 so that affordable homes provision is only required on 'major residential development' that comprises 50 units or more or more sites of 1ha and/or where there is an identified level of need in agreement with NIHE.

## **Monitoring & Review**

The Local Development Plan is intended to be a flexible document which responds to changing needs and circumstances locally. Monitoring will therefore be essential for the delivery of the local development plan and should provide the basis to trigger any requirement to amend the strategy, policies and proposals of the Plan.

Indicators and trigger points are set out in Chapter 5 of Part 1 Plan Strategy. We broadly support the monitoring indicators set out in the technical supplement, which are to be used to measure how well the plan is performing in terms of achieving its strategic objectives, including ensuring an adequate supply of housing for the district over the plan period.

However, projected housing figures and other relevant policies specified above should be amended as required in order to enable accurate monitoring of the plan.

### **Soundness Test**

- Policies SP08, HOU4, HOU10 are not sound under which the success of the plan is being assessed and are not based on robust evidence (Test CE2).

### **Remedy**

- Revise as per previous recommendations.

## **Housing Land Availability in Crossnacreevy**

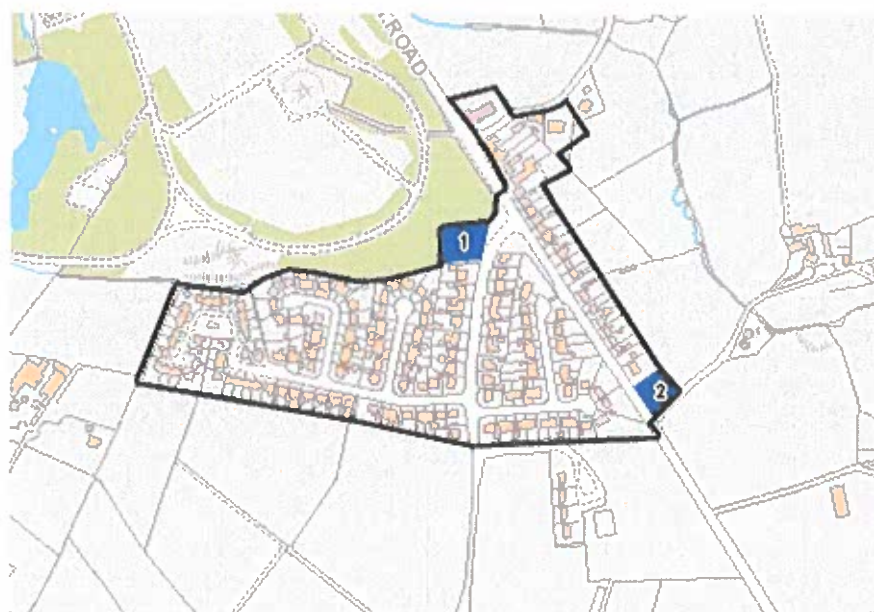
The Local Policies Plan will bring forward settlement limits for each of the settlements and allocate land, where appropriate, for new homes and employment to meet the identified needs of our Borough in a sustainable manner. It will also bring forward a range of local designations that will help steer overall growth and development.

The Strategic Housing Provision does not set a specific allocation to Crossnacreevy but allocates to the housing provision to a category of Villages and Small Settlements within which the Council suggests that there are 1,231 potential units remaining (11.7% of strategic housing allocation for the borough). There are 49 villages and small settlements identified in the settlement hierarchy that would need to share this allocation. However, on the basis of our arguments set out within Strategic Policy 08 above, the housing growth figure for villages and small settlements should increase to 2,986. This is then to be split to a percentage growth of 12% of villages (2,389) and 3% of small settlements (597). Whilst distributing this allocation based on population, 48 new dwellings will be required within Crossnacreevy within the next plan period.

The latest Housing Monitor (Appendix 3) for the Council Area relates to 2016-2017 identifies that Crossnacreevy has a remaining potentially suitable lands to accommodate 15 units (0.65ha).

The Housing Monitor itself uses the term “potentially suitable” to describe the lands it identifies as part of the housing supply. The use of this term acknowledges that not all sites identified in the housing monitor may be deliverable and highlights that a 5-year supply cannot be maintained.

A review of the lands within carried out by Gravis Planning identified that there are limited available lands suitable for development within the current settlement limit to accommodate any future housing growth, therefore it is evident that additional lands will be required within the next plan period or indeed before. All remaining lands have been assessed for potential and are mapped out in blue on the plan below:



| Site Ref | Status                      | Site Potential  | Potential Yield |
|----------|-----------------------------|---|-----------------|
| 1        | Playpark                    | The lands comprise a local playpark and is therefore unsuitable and unavailable for redevelopment                   | 0 dwellings     |
| 2        | Planning permission granted | Planning Permission was granted in March 2019 for the erection of three detached dwelling houses (LA05/2018/0517/F) | 3 dwellings     |

Overall, it is considered that there are limited land opportunities within the settlement limit, given that the lands identified are built out, committed or unavailable. Therefore, it is evident that more lands to accommodate future growth within the next plan period will be required and lands that are readily available for housing development be considered for housing in order to aid housing delivery within the settlement.

### **Proposed lands for inclusion within the settlement limits of Crossnacreevy**

Crossnacreevy is a small satellite village located in close proximity to Belfast therefore Belfast City Councils ambitious plans as detailed within their Preferred Options Paper for their new Local Development Plan will inevitable have a knock-on effect, in terms of housing demand, on neighbouring Councils areas that also contribute commuters to Belfast, such as Lisburn and Castlereagh.

On this basis, we therefore draw your attention to the lands located to the east of the settlement (Appendix 1) that could be included within the new settlement limit of Crossnacreevy, helping to contribute to the future growth of the settlement. The identified lands are suitable for development for the following reasons;

- The lands about the current settlement limit for Crossnacreevy;
- The lands are strategically located to the east of the Ballygowan Road, in the centre of the Carryduff, Comber and South Belfast triangle;
- There are no remaining lands available for development within the current settlement limit;
- The lands are located in close proximity to key arterial routes to the neighbouring towns and Belfast City;
- With its close proximity to Belfast, Crossnacreevy has convenient access to a comprehensive motorway and dual carriageway road network making it an ideal commuter location for those travelling in and around the City;
- George Best City Airport is just four miles away;
- Land rises to the east, therefore views of any future development would be contained.

On this basis, we would encourage the Council to consider our client's lands as being suitable lands for the inclusion within the new settlement limit of Crossnacreevy. We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as the LDP progresses.

Yours Sincerely,

Lisa Shannon

**Gravis Planning**

**Appendix 1**  
**Lands suitable for development to the East to be considered within the new**  
**Crossnacreevy Settlement Limit**





**Appendix 2**  
**Lisburn and Castlereagh Housing Monitor data 2017**

### Crossnacreevy Housing Monitor 31 March 2017



#### NORTHERN IRELAND LAND USE DATABASE HOUSING SITES

DEVELOPMENT STATUS OF ALL MONITORABLE SITES IN  
CROSSNACREEVY AS OF 31 MARCH 2017

| Site Ref                 | Site Name                               | Date of Survey | Units Complete | Remaining Potential | Area Developed | Area Remaining | Development Status   | Completion Date |
|--------------------------|---|----------------|----------------|---------------------|----------------|----------------|----------------------|-----------------|
| 18220                    | 21 KILRID MHW                           | 05/08/2015     | 7              | 0                   | 0.08           | 0.00           | COMPLETE             | 01/10/2015      |
| 2008                     | LANDS WEST 26 & 7 A) GORD PARK CO. C201 | 31/03/2017     | 17             | 15                  | 0.72           | 0.45           | DEVELOPMENT ON GOING |                 |
| <b>SETTLEMENT TOTALS</b> |   |                | <b>18</b>      | <b>15</b>           | <b>0.81</b>    | <b>0.45</b>    |                      |                 |