

Strategic Planning Directorate



Department for

Infrastructure

An Roinn

Bonneagair

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20 January 2020

**RE: LISBURN & CASTLEREAGH CITY COUNCIL – DRAFT PLAN STRATEGY
- CONSULTATION**

I acknowledge your letter of 11 October 2019 in relation to the formal public consultation on Lisburn & Castlereagh City Council's draft Plan Strategy.

In accordance with regulation 15 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 the Council consulted with the Department for Infrastructure (DfI) in relation to the draft Plan Strategy.

Please find attached representations to the consultation from:-

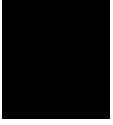
- DfI Planning (Strategic response and Annex 1);
- DfI TPMU;
- DfI Roads;
- DfI Rivers; and
- DfI Water and Drainage Policy Division.

I acknowledge the efforts of the Council in relation to the constructive engagement with Department officials to date and look forward to further

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engagement as the process moves forward.

Yours sincerely



Encls

Annex 1 – Additional DFI comments

General

The Department note that within some sections of Part 2 Operational Policies there is lack of cross referencing throughout the policies. For example, the General policy for economic development and tourism.

A - A QUALITY PLACE

HOUSING IN SETTLEMENTS

HOU1 New Residential Development

The Department notes the provisions of HOU1 which permit new residential development in settlements on land zoned for residential use; previously developed / brownfield land; in designated city and town centres, villages and small settlements; and living over the shop. The policy does not reflect mixed use zonings, for example that are indicated at SMU01. The Council should consider the relationship between this policy and SMU01 and any other strategic mixed use zonings. In relation to the proposal to encourage residential development in designated city and town centres, clarification is sought on the relationship to TC1 Town Centre, Retailing and Other Uses specifically in relation to the impact on the role and function of designated city/town centres.

Urban Capacity Studies

The Council state that approximately 40% of the growth requirement can be accommodated within the urban footprint. The Department understands and accepts that it may not be possible to achieve the 60% target established in the RDS 2035 in all cases. The Department would however seek clarification of the methodology used to determine this percentage figure and in particular the 'growth requirement' used to determine the percentage figures of 40% and over 80% respectively.

It is noted that the Urban Capacity Study (UCS) refers to a required growth of 12,177 units that can be achieved through committed sites, new sites and the reallocation of 50% of West Lisburn / Blaris for housing. Clarification of this statement is welcomed as it appears to differ from the overall strategic housing allocation figure of 11,550.

The Department notes the findings of the UCS which identifies an additional 41 sites equating to a further 975 units although it is noted from the Housing Growth Study paper that 270 of these units are located outside of the urban footprint. Council consider that they are not required to meet the requirement of 12,177.

HOU2 Protection of Land Zoned for Housing

The Department acknowledges that this policy supports provisions in relation to the protection of land zoned for housing. It is noted that in all cases proposed alternative uses must comply with requirements of Policy HOU4 to ensure there are no detrimental impacts on the privacy or amenity of existing or proposed residential properties. However HOU4 relates to design in new residential development. Is the intention to apply this policy to non-residential development as it applies to design in new residential development?

HOU4 Design in New Residential Development

The Department notes the provisions of HOU 4 reflect some of provisions of existing operational policy set out in QD1 'Quality in New Residential Development', and also introduce additional requirements in respect of accessible and adaptable design; energy and resource efficiency; electric vehicle charging points etc. Clarification is sought on how a range of dwelling types and designs can prevent social exclusion. Furthermore Criteria (e) appears to require the design of all dwellings to be capable of adaption to provide accommodation that is wheelchair useable, and clarification would be welcomed particularly whether it relates solely to access to dwellings or requires dwellings to be capable of modification for occupation by wheelchair users. Clarification on how this would apply in practice would be welcomed.

HOU6 Design Concept Statements, Concept Masterplans and Comprehensive Planning

The provisions of HOU 6 reflect the approach of the SPPS and broadly reflect Policy QD 2 'Design Concept Statements, Concept Master Plans and Comprehensive Planning' of PPS 7. It is noted that this policy differs from QD 2 in introducing different, lower thresholds in relation to the scale of planning applications for which a concept masterplan is required.

HOU10 Affordable Housing in Settlements

The Department fully supports the commitment in the plan objectives to delivering sustainable communities and new homes in a range of types and tenures, including affordable housing.

In respect of this policy, the Council propose that within settlements, and where a need is identified through the Housing Needs Assessment (HNA), proposals on sites of more than 0.5 Ha or comprising more than 5 residential units will only be permitted where provision is made for a minimum of 20% affordable units. It is noted that the contribution is stated to be a minimum and clarification would be welcomed in the policy or J&A of the circumstances when a greater contribution may be sought, for example in response to the need indicated by the HNA. Similarly where the need indicated by a HNA is less than the 20% contribution how will the level of contribution be calculated?

While the Department welcomes any policy that maximises opportunities to deliver affordable units and mixed tenure developments, the Council should continue to liaise with statutory partners including the Department for Communities and NIHE. This will ensure that the evidence base underpinning such approaches is robust and that measures such as guidance, are in place to support the practical implementation of the policy. This will be particularly important in respect of the exceptional circumstances when, as indicated in the policy, a financial contribution is made in lieu of the provision of affordable units.

HOU11 Specialist Accommodation

The reference to 'retirement villages' within the Justification and Amplification is noted in contrast to the reference within the policy to sheltered housing. Clarification is requested in relation to the definition of 'retirement village' and how this is distinguished from sheltered housing referred to in the policy wording. If there is no substantive difference then the Department recommends that for consistency the wording in the J&A should be revised to reflect that of the policy.

HOU12 Accommodation for the Travelling Community

The Department notes the provisions of the policy which reflect much of HS3 Travellers Accommodation (Amended) in the addendum to PPS12 'Housing in Settlements' and includes additional requires in relation to environmental considerations, sewerage, drainage, access and road safety. Council should note that the amended HS3 policy permitted as an exception, a single family transit site or serviced site without a requirement to demonstrate need. The wording in draft policy HOU12 would appear to permit such sites as an exception albeit still subject to a demonstration of need. Council should be satisfied that the plan evidence supports the approach set out and that Housing Needs Assessment prepared by the NIHE will, as appropriate, indicate need for single family transit sites.

COMMUNITY FACILITIES IN SETTLEMENTS

CF02 Protection of a Local Community Facility

The Department notes the intent of this policy, however policy criteria a) and b) offer opportunities encouraging the loss of community facilities rather than its protection. The Council should consider how they will measure a 'deficit in community facilities' as they range in nature, scale and function.

DEVELOPMENT IN THE COUNTRYSIDE

COU3 Replacement Dwellings

This policy reflects the SPPS and many of the provisions of existing operational policy. Whilst some criteria relating to necessary services being available and access to the public road not prejudicing public safety are not included, it is however noted that these elements are addressed in draft policies COU 15 and COU 16.

COU5 Affordable Housing

The Department notes the contents of the draft policy which takes account of the SPPS and broadly reflects Policy CTY5 in PPS21. It is suggested that the policy wording should refer to the requirement for the applicant to demonstrate that the need cannot be readily met within an existing settlement in the locality, rather than introducing this in the Justification and Amplification to the policy.

B - A THRIVING PLACE

ECONOMIC DEVELOPMENT

ED4 Redevelopment of an Established Economic Development Use in the Countryside

It is noted that this policy is reflective of the SPPS (paras. 6.82, 6.87 – 6.88).

Whilst the policy advises that the 'redevelopment of an established industrial or business site for storage or distribution purposes....will only be permitted in exceptional circumstances', the policy does not elaborate on what are considered to be exceptional circumstances. In addition, the J&A outlines the exceptions that will be permitted for small-scale proposals for storage and distribution uses. The inclusion of the details of exceptions detailed in the J&A, within the policy wording, may have been of benefit to the understanding of this policy and its implementation. Furthermore, it is unclear if these references to storage and distribution uses are related. However, the Council should ensure that any exceptions do not undermine the policy intention.

ED5 Major Economic Development in the Countryside

The policy identifies criteria a) - c) which should be considered, however there is no cross reference to the General Policy ED9. For example, integration and landscape mitigation for major economic development proposals in the countryside would be an important consideration.

ED7 Retention of Zoned Land and Economic Development

The Department acknowledges the policy seek to aligns with regional and strategic planning policy, however the Council are reminded that in stances where proposals would result in the loss of land zoned for economic development use should not normally be granted. Any decision to reallocate such zoned land to other such uses undermine the policy intention of ED7 for Retention of Zoned Land and Economic Development.

In relation to unzoned land, the Council refer specifically to the loss of B2, B3 or B4 uses. The SPPS (para 6.89) refers to unzoned land in settlements in current economic

development use (or land last used for these purposes). Council should satisfy themselves that the draft policy covers all economic development uses that it is intended for.

ED8 Development Incompatible with Economic Development Uses

The Department acknowledges that the Council's policy is reflective of Para. 6.90 of the SPPS, however the SPPS provides a number of examples whereby a development proposal might be considered incompatible with nearby economic development or other uses. The Council may wish to consider the inclusion of examples of incompatible development to provide greater clarity.

ED9 General Criteria for Economic Development

The Department notes this policy requires any economic development applications assessed under ED1-ED8 will also be required to meet the criteria of ED9 however Council may wish to consider cross referencing throughout the document to ensure consistency.

MINERALS DEVELOPMENT

MD1 Environmental Protection

It is noted this policy aligns with para 6.158 of the SPPS, however this policy omits reference to Peat extraction although it is referenced within the J&A. The Department considers that this should be within the policy, in line with the SPPS requirement to safeguard mineral resources which are of economic or conservation value. Furthermore, the Council highlights the need to safeguard the environment in Policy SP13 'Mineral Development'.

MD3 Areas of Mineral Constraint

The SPPS (Para 6.155) states that LDPs should identify ACMDs, and that 'there should be a general presumption against minerals development in such areas'.

The Council stipulates that ACMDs 'will be subject to review at the Local Polices plan', however, it is unclear whether or not there are existing ACMDs within the Council area to be carried forward.

SP13 set out in Part 1 of the draft PS acknowledges that further work in identifying mineral safeguarding areas and areas of mineral constraint will be taken forward at LPP stage.

C - A VIBRANT PLACE

TOWN CENTRES, RETAILING AND OTHER USES

General Comments

The Department notes the Council have not provided any operational planning policy specific to Sprucefield Regional Shopping Centre, although strategic policy SMU03 seeks to address future development at this location.

Furthermore, it is noted that there is no operational planning policy to deal specifically with rural shops. Whilst Policy TC1 could be considered to assess such proposals Policy TC1 serves to establish a sequential approach. Furthermore, Policy TC5 is associated with proposals within Villages and Small Settlements, with no reference to development outside these locations. Council should consider how rural shops will be considered.

TC1 Town Centre, Retailing and Other Uses

This policy adheres to the provisions of the SPPS, and confirms that a sequential approach will be adopted for retail and other city/town centre uses in order of preference set out in a hierarchy of centres. Whilst the policy wording does not specifically refer to a town centre first approach, the policy direction, in combination with the 'hierarchy of centres' indicates that such an approach is being adopted by the council in relation to these uses. The Council may wish to ensure that the adoption of a town centre first approach is made clear within the policy wording.

The SPPS (para 6.283) refers to Retail Impact Assessment and/or an assessment of need in relation to proposals over 1,000sqm, which the Council set out in the J&A. The Council may wish to consider stipulating this requirement within the policy itself. The Council should consider the circumstances in which proposals that are marginally below the stated threshold, as assessment would not be required. The flexibility of the

requirement to undertake a RIA or assessment of need will be subject to the Council's judgement/assessment.

The policy refers to 'edge of centre' within the hierarchy of centres, and the J&A stipulates preference will be given to this location before considering out of centre locations. The SPPS (para 6.287) clarifies the default distance threshold for edge of centre sites, however any reference to distance is absent from the Council's policy. This could pose some issues in relation to the application of this policy. The Council may wish include reference to this and subsequently if there is a departure from that stipulated in SPPS, the Council should consider what distance is appropriate and supported by the evidence base.

It is noted that Sprucefield Regional Shopping Centre appears to be excluded from the hierarchy of centres and town centre first approach promoted by the SPPS. The Department acknowledges that strategic policy relating to Sprucefield is outlined in Part 1 of the dPS. However, the vast majority of the designation is retail in nature, and is likely to be the subject of further proposals for retail development in the future, there may be benefit in defining the Centre's position within the retail hierarchy. The policy should be clear that it does not apply to Sprucefield Regional Shopping Centre.

TC2 Lisburn City Centre Primary Retail Core and Retail Frontage

The policy seeks to restrict non-retail development within the primary retail frontage (PRF) to no more than 40%, however it is unclear how proposals that breach this threshold might be considered/assessed. The policy would benefit from greater clarity on the practical application. The Council should also consider the impact of this policy on the PRF, and the unintended consequences for vitality and viability that the policy seeks to protect.

TC4 District and Local Centres

The SPPS (Para. 6.279) advises that planning authorities should retain and consolidate existing district and local centres as a focus for local everyday shopping, and ensure their role is complementary to the role and function of the town centre. However based upon the findings of the Retail Capacity Study (Technical Supplement

5), the policy appears to be promotive of expansion of these centres rather than the retention and consolidation.

The policy suggests that District and Local Centres are identical with regard to their role and function. The J&A further states that Forestside District Centre and Dundonald Local Centre provide a focus for local shopping and offer a complementary role in providing shoppers with convenience and choice. However the Retail Hierarchy, as set out in Strategic Policy 14 (Figure 5) acknowledges the differences between the two types of centre, as they do not share the same hierarchy level.

Furthermore, the Department notes that criterion (d) requires that proposed B1 (a) office developments do not exceed 400 square metres of gross floorspace. The rationale for the threshold of 400 sq metres is unclear, therefore the Council should be content this is justified by evidence. The Council should consider how development of this scale could be incorporated into the Dundonald Local Centre without impacting upon the role and function of the centre.

The J&A also advises that both centres should not compete with other hierarchy centres, however, the Department consider that, by its very nature, Forestside District Centre is more than capable of doing so, and any expansion on the existing provision is likely to increase competition between this and other centres (including town and city centres) throughout LCCC and neighbouring council areas. The Department would welcome further clarification in relation to the role and function of the existing District and Local Centres.

The Council may also wish to consider separating this policy to deal with 'District Centres' and 'Local Centres' individually.

TC6 Petrol Filling Stations and Roadside Service Facilities

The Department welcomes the confirmation within the J&A that proposals for petrol filling stations and roadside service facilities at a countryside location will be considered in exceptional circumstances only.

However, this policy should take account to the DfI Guidance on the Preparation of LDP Policies for Transport (February 2019). This makes specific reference to petrol filling stations, and advises that operational planning policy 'should require that proposals for new petrol filling stations in the countryside, within 12 miles of existing services, will not be acceptable'. Further comments in relation to this aspect will also be highlighted in DfI Roads response.

D - AN ATTRACTIVE PLACE

TOURISM

General Comments

It is noted that within Policy TOU7 that all tourism development proposals assessed under policies TOU1 - TOU6 will be required to meet those general requirements of TOU7, however there are no cross-references to this requirement. Policies TOU1 – TOU6 would benefit from cross referencing to TOU7. Furthermore this would highlight the additional general criteria to be met for all tourism development proposals.

TOU2 Proposals for Tourism Amenity in the Countryside

In line with the SPPS, this policy refers to the requirement for both a tourism benefit statement and sustainable benefit statement. It is noted that there is only detail on a tourism benefit statement which is set out in the Council's SPG Part D: Tourism, however no further distinguishing detail on sustainable benefit statement. Whilst the SPG specifically highlights Tourism Benefit Statements, it also refers to sustainable benefit statements under this heading.

Furthermore within the SPG, it suggests that a tourism benefit statement is similar, if not the same, as a sustainable benefit statement. To avoid confusion the Council may wish to consider amalgamating these statements if they serve the same purpose.

Proposals for extensions 'will ***only*** be permitted where its scale and nature does not harm the rural character, amenity, landscape quality or environmental integrity of its locality'. The Department notes this policy introduces additional wording to that of current operational planning policy.

Furthermore the Department acknowledges the policy indicates that proposals 'will be expected to be accommodated through conversion, the reuse or extension of existing buildings on the site, unless it can, by exception, be demonstrated that this is not a viable option'. Current operational planning policy includes the term, 'where possible' in relation to such a requirement, and therefore this firmer emphasis is welcomed.

TOU3 Proposals for Tourist Accommodation in the Countryside

This policy is reflective of the SPPS and current operational planning policy to support the promotion of a sustainable approach to the provision of tourism infrastructure.

The Department considers the first paragraph of the J&A is unclear, 'The retention and conversion of a vernacular building for such uses, will be favourably considered where the environmental benefit of full or partial replacement will outweigh the retention and conversion of the building'. The Council should consider there is no ambiguity of the intention of this statement.

It is also unclear what assessment will be undertaken to consider 'condition of the building and the economic feasibility of repairing and maintaining' for retention of vernacular buildings. Will an applicant be required to submit specific documents?

The J&A advises that applications will be expected to be accompanied by a variety of information. The policy states an expectation, not a requirement. The Council do not provide further detail of what is considered 'sufficient' evidence to meet this expectation, and therefore the Council may wish to consider the ambiguity created by this lack of clarity.

TOU6 Proposals for Major Tourism Development in the Countryside

The Department welcomes confirmation that Major Tourism Development is to be in accordance with the thresholds set out in the Schedule to Planning (Development Management) Regulations (NI) 2015.

The policy refers to a) the demonstration of 'exceptional benefit'..., and c) demonstration of 'sustainable benefit', however the J&A refers to tourism benefit and

sustainable benefit statements. It is unclear how an 'exceptional benefit' should be demonstrated, and the policy should be clear and consistent to avoid ambiguity.

TOU7 General Criteria for Tourism Development

As referred above, policies TOU1- TOU6 would benefit from cross references to this policy, as the additional requirements that tourism development proposals must satisfy.

The terminology used within criteria a)... 'will indicate walking and cycling provision' may be open to interpretation. The Council may wish to consider this wording to provide greater clarity, particularly in relation to the intention of the policy? For example, does the policy also seek to support or promote walking and cycling provision?

OPEN SPACE, SPORT AND OUTDOOR RECREATION

OS1 Protection of Open Space

It is noted that under this policy 'substantial community benefits' will include Affordable Housing. Whilst the Department notes HOU10 refers to this exception and set out the criteria, Policy OS1 would benefit from this level of detail in the policy, instead of reference to HOU10 in footnote.

The Council should be aware that the existing relevant protocol is between the Department and the Northern Ireland Housing Executive. Continuation of this protocol would therefore require a new agreement to be negotiated between the Council and NIHE. The Council should be satisfied, in the case of loss of open space that the implications and permanence of any redevelopment have been carefully considered.

OS3 Noise-Generating Sports and Outdoor Recreational Activities

Para 6.208 of the SPPS relates to Noise-Generating Sports and Outdoor Recreational Activities. Council have strengthened this approach. The SPPS states that 'These developments must only be permitted where there is no unacceptable level of disturbance'. Council, within their policy OS3, have stated that these developments will only be permitted where there is 'no conflict, disturbance or nuisance caused' to

people living nearby, other noise sensitive uses, to farm livestock and wildlife, to the enjoyment of the natural environment/nature conservation and the historic environment. This offers greater clarity, in line with para 6.208 of SPPS.

OS6 Outdoor Recreation in the Countryside

Council policy omits reference to the best and most versatile agricultural land; that the road network can safely handle the extra vehicular traffic the proposal will generate; and satisfactory arrangements are provided for access, parking, drainage and waste disposal. Furthermore there is no reference to accessibility by means of transport other than the private car. The Council may wish to consider these aspects in line with para 6.208 of the SPPS.

E - A GREEN PLACE

HISTORIC ENVIRONMENT AND ARCHAEOLOGY

HE6 Change of Use and/or Extensions or Alterations to a Listed Building

Para 6.13 of the SPPS relates to the change of use and/or extensions or alterations to a listed building. The SPPS uses the phrase 'may be permitted' in contrast to Council policy where they have stated that the 'Council will permit'. The Council may wish to use policy wording in line with the SPPS.

NATURAL HERITAGE

NH1 European and Ramsar Sites – International

The SPPS (para 6.178) states that 'A development proposal which could adversely affect the integrity of a European or Ramsar site may only be permitted in exceptional circumstances as laid down in the relevant statutory provisions'. Whilst the Department acknowledges this policy provides criteria for 'exceptional circumstances', it is not clear that all the criteria must be satisfied, in line with the SPPS para 6.180.

NH2 Species Protected by Law

It is noted that this policy condenses existing policy criteria, and as above in NH1, it is not clear that all the criteria must be satisfied, in line with the SPPS para 6.180.

NH3 Sites of Nature Conservation Importance –National

The Department welcomes the information supplied in relation to National Designations, aligning with the SPPS para 6.183, however, the definition of a 'Marine Conservation Zone' is contained within the J&A but there is no reference to it in the policy.

NH6 Areas of Outstanding Natural Beauty

The Department notes that there is only 1 AONB (identified on Maps 4, 9 & 12), which the Lagan Valley Regional Park (LVRP) is a significant part of. There appears to be a lack of policy in relation to the LVRP. It is noted that this Regional Park is referred to throughout Part 1 of the LDP but this does not follow through into operational policy in Part 2 and there is no reference to the LVRP within this this policy.

The SPPS (Paras 6.186 – 6.188) relate to Areas of Outstanding Natural Beauty. Specifically, para 6.187 states that proposals within AONBs must 'be sensitive to the distinctive special character of the area and the quality of their landscape, heritage and wildlife...' Council should consider an approach more in line with the SPPS.

F - A CONNECTED PLACE

ACCESS AND TRANSPORT

TRA1 Creating an Accessible Environment

It is noted reference is made within the J&A to DCAN 11 'Access for People with Disabilities' and draft DCAN 11 'Access for All' in the context of further information on designing for a more accessible environment. The Department has clarified its position in relation to extant planning guidance, please refer to the strategic response and Department's website for further details.

TRA3 Access to Protected Routes

Regional Strategic Policy within the SPPS (para 6.301) in relation to protected routes is to restrict the number of new accesses and control the level of use of existing accesses onto such roads. On motorways and high speed dual carriageways an

exception may be considered for service areas where there is a demonstrable need. For other dual carriageways or ring roads, through passes and by-passes, permission will be given if a proposal is considered to be regionally significant.

The Department welcomes that this policy in relation to 'Access to Protected Routes' aligns with regional policy. However the Policy TRA3 Other Protected Routes - Outside Settlement Limits does not align with existing policy. The Council policy provides for a relaxation indicating that permission will be granted for a direct access.....'where it is demonstrated that access cannot reasonably from an adjacent minor road'. Further comments will also be provided by DfI Roads in relation to this policy.

TRA7 Car Parking and Servicing Arrangements in New Developments

The policy states, 'A proportion of the spaces to be provided will be reserved for people with disabilities'. An associated footnote subsequently directs to the '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)'. The Department has clarified its position in relation to extant planning guidance, please refer to the strategic response and Department's website for further details.

RENEWABLE ENERGY

RE1 Renewable Energy Development

Paras 6.214 – 6.234 relate to renewable energy. SPPS para 6.223 states that a cautious approach for Renewable Energy development proposals will apply within designated landscapes which are of significant value such as AONBs. LCCC have a number of important environmental designations for example LVRP, however RE1 has no reference to this 'cautious approach'. The Department considers this an important aspect of regional renewable energy policy and should be included.

It is however noted that SP21 proposes a 'precautionary approach' will be applied for all renewable development proposals. SP21 continues to detail that renewable proposals will be assessed through operational policies RE1 & RE2, therefore this cautious approach should be reflected within these operational policies.

Council have omitted reference to water 'quantity' in bullet d), this should be included within their policy in line with the SPPS para 6.224.

The policy for Wind Energy Development combines both wind turbines and wind farm development, creating ambiguity around the policy intention. The SPPS (para 6.227) is clear in its intention that *'For wind farm development a separation distance of 10 times the rotor diameter to occupied property, with a minimum distance not less than 500m, will generally apply'*.

If it is the Council's intention to provide policy provision in relation wind turbines, this should be clearly separated from policy relating to wind farms to provide clarity for practical application. Currently as this policy is drafted the requirement for individual wind turbines is more onerous than that relating to wind farm development, is this Council's intention? Also this policy has removed reference to 'generally' resulting in the potential lack of flexibility which was provided within the SPPS policy.

Council should be satisfied that the evidence supports this approach and should be clear.

Furthermore while it is noted the J&A refers to best practice and supplementary guidance the Department would suggest the policy would greatly benefit from further detailed information and considerations as set out in SPPS Para 6.228 & 6.229. This includes considerations such as noise and shadow flicker, cumulative impact and communications interference, and are important aspects of policy delivery and should be within the LDP.

WASTE MANAGEMENT

WM1 Waste Management Facilities

The Department notes this policy omits the reference to the permanent loss of the best and most versatile agricultural land within criteria e), consideration should be given to its inclusion.

The J&A details does not refer to other Waste Management Facilities (WMF) that will deal with incineration and thermal processes. Whilst they are referred to under 'Other Matters', as the primary policy dealing with WMF this detail would add benefit.

The last sentence of page 106 refers to 'planning statement'. The Council should ensure consistency throughout draft Plan Strategy.

FLOODING

FLD5 Development in Proximity to Reservoirs

The Department notes the proposed policy aligns with existing operational policy and the SPPS, however it does not reflect the latest DfI advice (as advised to all Council Heads of Planning on 6th June 2019). The Council should refer to DfI Rivers response for further information.

Further Comments on Technical Supplement 1: Housing Growth Study

The main element of the technical supplement is an independent Housing Growth Study. The study shows a good understanding of population and household projections. It has produced an alternative HGI figure to the recent updated HGIs published by the Department. While the periods covered differ, the figures are similar. However, the 'alternative' HGI appears to use data from the 2012-based HGIs (previously published by DfI) which is not relevant to the time periods of this Plan. This includes second homes and vacant stock figures which appear to be derived from the 2012-based HGIs. These figures relate to 2025 and as such are not suitable to be used in a calculation to forecast to 2032. For the 2016 update of the HGI second homes and vacant stock data were sourced from the NISRA Combined Survey sample, which is not publicly available

Section 4.1 – 4.6 references data lifted from the 2012-based HGIs which should now be considered obsolete. Sources have also changed in the refresh so the detail included at para 4.4 is not entirely reflective of the current HGIs. Also by way or clarification, while HGIs are produced by out-posted NISRA statisticians within DfI, the HGIs are published by DfI and not by NISRA.

The Lichfield Study

In relation to Housing Market Dynamics and paragraph 4.2 please note that more up-to-date data is available. While plans cannot be wholly current in view of production timescales the Q1 data presented here has been revised so the figures for the period

included have changed. <https://www.finance-ni.gov.uk/articles/northern-ireland-house-price-index>

Similarly in relation to paragraph 4.4 updated figures are available however the picture presented does still apply and the decision not to compare to the artificial peak of 2007 but to compare to more 'normal' times are the start of 2005 is a sensible approach.

Paragraph 4.15 in relation to completions falling below future need as set out in the 2012-based HGIs is accurate. Given the HGI estimate for LCCC is higher in the 2016-based estimates, this remains accurate. Completions for the three most recent years have been 2006 – 722; 2017 – 692; and 2018 – 712. <https://www.finance-ni.gov.uk/sites/default/files/publications/dfp/New%20dwelling%20statistics%20Quarter%203%202019.xlsx>

In relation to paragraph 5.2 of the report, it should be noted that 2018 Mid-Year Population Estimates (MYE) were published in June 2019. The MYE factsheet is available at <https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/MYE18-Factsheets.pdf>. The 2018 population is slightly higher than the than 2017 figure quoted (144,400 and 142,640 respectively), although increases are shown to be fairly equally split across the age groups so again, the picture the data presents is similar.

In relation to scenario modelling Paragraph 6.11 (5b) please note that economic inactivity is available from NISRA for 2018 <https://www.nisra.gov.uk/system/files/statistics/ODP-17-Inactivity-2018.XLSX>. From this source, economic activity for LCCC would be 84.7%. The rates used however do not appear in the report.

In relation to the scenarios presented at paragraph 6.21 – 6.25 there is not enough information presented to fully understand how each scenario is arrived at. Given the population forecasts are available from NISRA and referenced earlier in the report, what is the rationale behind differing population changes across the three scenarios?

In relation to paragraph 7.8 on housing wants / demands as distinct from housing need, clarification is requested of the adjustment that has been applied in reaching this conclusion.

**LCCC Draft Plan Strategy (October 2019) – DfI Roads, Eastern Division
response**

Soundness Test – DfI Roads considers there is a risk to soundness under Consistency Test C3 as the draft Plan Strategy has not taken account of policy and guidance issued by the Department in relation to proposed policy TRA3 Access to Protected Routes, Other Protected Routes – Outside Settlement Limits (see comments on Part 2, bullet point 4)

Part 1

Comments and suggestions – see comments below.

1. **Page 34, A Quality Place (bullet point 7) – LCCC should consider using stronger language than “Support.....adequate infrastructure....”,**
2. **Page 42, Strategic Policy 02 Improving Health and Well-being – LCCC should consider using stronger language when stating “Noise and air quality should also be taken into account when designing schemes. By comparison please note the language used in Regional Development Strategy 2035 RG7 on page 134.**
3. **Page 45, Strategic Policy 07 Section 76 Planning Agreements – LCCC should include the term “highway infrastructure” in bullet point a). As well as provision, LCCC may also wish to include reference to the developers contributing to the ongoing maintenance of infrastructure.**
4. **Page 59, Table 2 – LCCC may wish to consider including column headings. LCCC should review the wording used in the “Transport Test” and consider using a stronger term than “potential” “for integrating land use and public transport and walking and cycling routes”, particularly in urban areas which should afford greater opportunity.**
5. **Page 61, Strategic Housing Allocation – LCCC should review the wording of bullet point 8, which seems to mostly deal with the development management approach towards development applications post zoning, rather than detailing the process of zoning land for housing.**
6. **Page 80, SMU02 Purdysburn/Knockbracken, bullet point (a) – the A24 Saintfield Road is a Protected Route and therefore any proposed new access or intensification of use of an existing access must be in accordance with the**

adopted TRA3 (currently PPS3, AMP3) and the SPPS. LCCC should include a reference to the need to link the site to the adjacent Cairnshill Park & Ride site under bullet point f) and in the Justification and Amplification in order to reduce private car use generated from this development site.

7. **Page 92 -105, Growing our City, Town Centres, Retailing and Other Uses** – LCCC may wish to consider the impact of parking strategies in this section, including DfI Roads feedback dated 08/08/2019.
8. **Page 105, Map 10** – LCCC should ensure the Area of Development Potential does not impact on the Road Protection Corridor for the M1/A1 link, which is located just east of this site.
9. **Page 136, Strategic Road Schemes** - LCCC should review the wording used to reflect the fact that the M1/A1 Link and widening of the M1 between Black's Road and Sprucefield are two separate schemes.
10. **Page 137, Post Publication of BMTP** - LCCC should make reference to the proposed Park & Ride site at Millmount that has not been provided, but an alternative site at Dunlady Road that services BRT has been developed.
11. **Page 137, LCCC Car Park Strategy, 2019 (Draft)** – LCCC should include a reference to the need for the car park strategy to contribute to a reduction in private car use.
12. **Page 141, Key Transport Infrastructure Schemes** – LCCC should review the accuracy of the last sentence in this section as the LTS will not allocate residential zonings.
13. **Page 141, Park & Ride / Park & Share** – LCCC may wish to also include reference to the proposed expansion of the Cairnshill P&R site.
14. **Page 143, Car Parking** – LCCC should consider reviewing the existing area of parking restraint, along with DfI, as part of the Local Policies Plan.

Part 2

Comments and suggestions – see comments below.

1. **Page 92, TRA1, bullet point C)** – Consider including reference to cycling, in line with DfI Guidance on the Preparation of LDP Policies for Transport (Issued January 2019).
2. **Page 92, TRA1, Justification and Amplification, last paragraph** – This refers to DCAN 11 'Access for People with Disabilities', which following letter

issued by (Chief Planner & Director of Regional Planning) on 28 August 2019 will cease to have effect as soon as practicable.

3. **Page 93, TRA2, Justification and Amplification, second last paragraph** – refers to the 'Department', but this should be the 'Council'.
4. **Page 94, TRA3 Access to Protected Routes, Other Protected Routes – Outside Settlement Limits** – The Plan Strategy as currently drafted would permit direct access onto the Protected Route Network Outside Settlement Limits where access cannot be reasonably obtained from an adjacent minor road. This proposed wording does not align with the Strategic Planning Policy Statement for Northern Ireland (SPPS) and DfI Guidance on the Preparation of LDP Policies for Transport (issued January 2019). The reason why this is important is the Protected Route Network are main roads that facilitate the efficient movement of traffic over long distances throughout Northern Ireland. These roads are regionally significant, rather than just serving an individual council area. They contribute significantly to economic prosperity by providing efficient links between all the main towns, airports and seaports, and with the Republic of Ireland. LCCC should amend the wording of TRA3 Access to Protected Routes to align with the SPPS and DfI Guidance.
5. **Page 95, Transport Assessment** – LCCC should consider including the need monitor, review and possible enforcement in relation to Travel Plans.
6. **Page 96, TRA7, bullet point (a)** – LCCC should review the wording of bullet point a) and consider removing the word 'accompanying' in reference to Travel Plans.
7. **Page 96, TRA7, bullet points (a-e)** - LCCC should review the wording of the bullet points a) – e) and not having an "or" between each bullet point may suggest that all of these circumstances need to apply in order for a reduced level of car parking provision to be acceptable beyond formal areas of parking restraint.
8. **Page 96, foot note 34** – This refers to DCAN 11 'Access for People with Disabilities', which following letter issued by Angus Kerr (Chief Planner & Director of Regional Planning) on 28 August 2019 will cease to have effect as soon as practicable.
9. **Page 98, TRA10** - LCCC should review the wording of bullet point a) and provide a broader test of need in case the Local Transport Plan does not include this level of detail.

10. LCCC should review the operational policy on Access and Transport in the draft Plan Strategy and include Key Policy Consideration 'Integration of Land Use and Transportation', including Justification and Amplification, as outlined in DfI Guidance on the Preparation of LDP Policies for Transport (issued January 2019).

11. **Page 118, AD1** - LCCC should review the wording of sub-bullet point 3. to say 'could reduce the effectiveness of traffic lights or traffic signs, or'.

LISBURN AND CASTLEREAGH CITY COUNCIL DRAFT PLAN STRATEGY

Comments provided by the Department for Infrastructure's

Water and Drainage Policy Division

December 2019

The Department for Infrastructure's (the Department) Water & Drainage Policy Division (WDPD) has reviewed the contents of Lisburn and Castlereagh City Council's Draft Plan Strategy and has a number of comments to make on it.

Soundness Test: C3 Did the Council take account of policy and guidance issued by the Department?

Comments: The Department has previously met with relevant Council officials and presented current policy and legislation on Sustainable Drainage Systems (SuDS), development in proximity to reservoirs and Waste Water Treatment Works (WwTW) capacity constraints. In addition to this, the Department also provided comments on these issues through Council's consultation on the Local Development Plan Preferred Options Paper. **There are however a number of issues, highlighted below, which the Council will wish to consider.**

Soundness Test: CE4 It is reasonably flexible to enable it to deal with changing circumstances.

Comments: The Department would encourage the Council to request further updated information from Northern Ireland Water in respect of all the sewerage networks and wastewater treatment works.

LOCAL DEVELOPMENT PLAN 2032 – DRAFT PLAN STRATEGY - PART 1

Strategic Policy 21 Renewable Energy

Other Utilities (P147)

The Department welcomes the reference to Regional Guidance 12, of the Regional Development Strategy, which promotes a more sustainable approach to the provision of water and sewerage services and flood risk management. This Guidance states that planning for the provision of water and sewerage infrastructure and treatment facilities is both a practical and environmental necessity for regional development. It also sets out the importance of integrating water and land use planning and encouraging sustainable surface water management.

Strategic Policy 22 Telecommunications and Other Utilities

The Department welcomes the Council's view that the issue of capacity of the existing wastewater treatment works (WwTWs) in the various settlements across the Council area requires a joined-up approach between NI Water and the Council, to ensure that the needs of the community and economy can be met over the Plan period.

Strategic Policy 24 Flooding

Page 156 of the plan makes reference to "DfI Rivers, an Agency within DAERA". This is incorrect. DfI Rivers is a business area within the Department for Infrastructure.

Appendix D - Evaluation of Settlement Characteristics (P170 - P174)

The Department welcomes that this appendix sets out where the Council plans to focus major population and economic growth and also stresses the need to examine the existing sewerage infrastructure when considering future growth.

The level of detail included is also welcomed as it details the wastewater treatment works in the council area, the area they serve and the level of available capacity and where sewerage network issues exist. It also acknowledges that a number of works within the council boundary, serve areas in other council jurisdictions and vice versa.

The level of detail provided demonstrates a close working relationship between the Council and NI Water and going forward, it will be important this continues to help manage and facilitate growth. Regular communication between both parties will also help to ensure both are aware of the latest position regarding growth and available wastewater capacity. This approach will also help to inform NI Water's business planning, which aims to address future water and wastewater needs.

The Department understands that NI Water will also continue to help manage this issue by working closely with the Council, to help facilitate development, where possible.

Sustainable Drainage Systems (SuDS)

Sustainable Urban Drainage Systems are referenced on pages 37, 39, 108, 132 167 and 168.

The SuDS acronym has developed over time from SUDS to SuDS. Sustainable Urban Drainage Systems (SUDS) is no longer widely used. Sustainable Drainage Systems (SuDS) is the more widely used industry term.

It is welcomed that Sustainable Drainage is specifically referenced in point 5 of objective D- An Attractive Place & point 5 of objective F: A Connected place.

D: An attractive Place

There is little reference specifically to SuDS in the strategic policies set out in the chapter. There is reference to flood mitigation under Strategic Policy 17 on page 118, and it would be encouraging to see this statement developed to include SuDS as one of the mitigation measures available.

F: A Connected Place

Under Strategic policy 24, sustainable drainage systems are reference as an aid to alleviate issues around surface water flooding. This is welcomed. SuDS are of course relevant for all development to reduce future risk of flooding, even where there is no historic flood risk.

Living with Water Programme

LWWP welcomes that the plan makes reference to the need for Blue Green infrastructure, Sustainable Drainage Systems (SuDS) and considers the need for flood prevention. The plan

also appears to support the need for and provision of adequate infrastructure (including water, sewerage and transport) for sustainable residential development).

The Draft Plan Strategy does not currently mention the Living with Water Programme (LWWP). Given that the programme will help address issues in the Lisburn and Castlereagh area, it might be prudent for the Council to highlight this programme in the Draft Plan Strategy. The Council may wish to include a reference to the programme along the following lines:-

“The Living With Water Programme (LWWP) has been established to progress a Strategic Drainage Infrastructure Plan in order to provide a holistic and integrated approach to drainage. Work has been ongoing to identify and prioritise infrastructure issues which need addressed. Through the LWWP, issues have been identified with the Lisburn and Castlereagh sewerage network system and wastewater treatment works particularly with regard to discharges in Belfast Lough. These issues have the potential to impact on capacity for new connections and may lead to new connections being refused”.

PART 2 – OPERATIONAL POLICIES

1. Housing in Settlements

It is very encouraging that proposals for residential development will be expected to conform to design criteria which ensures the design and layout should, where possible include use of permeable paving and sustainable drainage.

A/1/ Page 16 Landscaping and Private Open Spaces - Makes reference to “the ‘greening” of spaces” – consideration should be given to ‘Blue-Greening’ open spaces to make room for blue/green infrastructure. This should also be considered for public open spaces, not just private open spaces.

Under the subheading Sustainable Drainage on page 18, the focus seems to be on hard permeable surfaces. It would be encouraging to see this developed here or within the ‘Open Space in New Residential Development (HOU5)’ heading to provide an equal emphasis on green and blue SuDS e.g. swales, basins, green roofs, rain gardens etc. to provide a broader range of features that could be considered for integration into a development.

HOU5 - reference to Blue & Green infrastructure - but only that ‘provision must be made for open space that links with blue/green infrastructure where possible and provides pedestrian and cycle linkages to nearby public amenity spaces’. Could this be changed to include that ‘adequate provision for blue green infrastructure must be made in public open space’?

7. Tourism

It is welcomed that Sustainable Drainage Systems feature in TOU7 General Criteria for Tourism Development section d).

8. Open Space, Sport and Outdoor Recreation

Page 68 - it is good to see referenced that Open Space can ‘help reduce flood risk’. This could be expanded upon to include the need for:

- blue green infrastructure in open spaces;

- to allow for open spaces to be flooded, during times of excess rain, to help reduce flood risk even further; and
- consider open spaces for diversion of flood water “design for exceedance”.

11. Access and Transport

It is encouraging that RA9 Park and Ride/Park and Share Car Parks Justification and Application features sustainable drainage solutions as a consideration for developers. The focus seems to be on hard parking surfaces. An equal emphasis could be on the use of SuDS in the landscaped areas within a car park. There could be added environmental benefits achieved by this approach.

14. Utilities

UT1 – Page 104 – states that services must be laid underground, however, does not make reference to the need for Sewerage and Drainage infrastructure and the need for additional capacity within that infrastructure.

15. Waste Management

WM2 - Treatment of Wastewater Page 107

This section refers to development proposals to provide mains sewage wastewater treatment works. It makes no reference to the need for connection to the existing mains sewerage network or the river network for storm drainage.

2nd para states ‘non mains sewage treatment will only be permitted where it is demonstrated’ ‘that there sufficient capacity to discharge effluent to a Watercourse’. This should be revised to state ‘treated effluent’

Also states ‘...this should not create or add to a pollution problem’. This should be revised to include ‘add to or create additional flood risk’. This section also refers to the Department of Agriculture and Rural Affairs (DAERA) - should state Department for Agriculture, Environment and Rural Affairs).

Page 110 refers to the flood plain. The flood plain definition should include reference to climate change e.g. ‘*Fluvial Flood Plain - The extent of a modelled flood event within a 1 in 100 year probability (AEP of 1%), plus the latest climate change prediction*’.

16. Flooding

It is welcomed that FLD3 states that consideration should be given to the use of sustainable drainage systems as the preferred drainage solution.

Lisburn and Castlereagh City Council comments Strategic Response

Introduction

1. The Department for Infrastructure would like to thank the Council for the opportunity to comment on Lisburn and Castlereagh City Council's Local Development Plan (LDP) draft Plan Strategy. The LDP should provide a 15-year framework to support the economic and social needs of a Council's district in line with regional strategies.
2. The Council's LDP should support and spatially represent the Community Plan vision. Whilst the LDP and Community Plan should work in tandem toward this vision, the LDP has a distinct role in giving spatial expression to the Community Plan. It is also important to acknowledge that preparation of the LDP is subject to a different statutory process, including an Independent Examination (IE) to test Soundness of the Plan as a whole. This includes examining the content of the Plan by reference to tests set out in guidance. These require Council to take account of the Regional Development Strategy (RDS) 2035 and other policy and guidance issued by the Department.
3. In view of the above, and in keeping with oversight of the process, the Department offers this representation in the interest of good practice and to assist the Council to minimise the risk of submitting an unsound Development Plan Document (DPD). In developing this response the Department has looked for clear evidence that the tests set out in Development Plan Practice Note (DPPN) 06 'Soundness' have been addressed. All comments are offered without prejudice to a future Minister's discretion to intervene later in the plan process or to the Independent Examination of the draft Plan Strategy.
4. We acknowledge the considerable amount of work that the Council development plan team have put into preparing the draft Plan Strategy and supporting documents and would encourage the Council to seek legal advice to ensure that all the procedural requirements have been met, including Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA). Responsibility for these matters rests with the Council.
5. This strategic response makes comment on aspects of the six Strategic Objectives (A – F) that the Council have developed along with the associated actions and Strategic Policies.

6. In considering the draft Plan Strategy the Department has identified 3 broad areas of particular importance and focus. These are the Growth Strategy proposed by the Council including the Spatial Planning Framework, Infrastructure availability and cross boundary working.
7. The overarching purpose of the Plan Strategy is to provide a strategic policy framework for the plan area as a whole and bring forward a local growth strategy. The Growth strategy will shape the development of the area over the plan timeframe and therefore should take account of the relevant policy and guidance and be supported by a robust evidence base.
8. In line with the draft Programme for Government (PfG) the Department is focused on supporting inclusive growth by connecting people and opportunities through infrastructure. A Plan Strategy should make it clear how infrastructure which is needed to support policies within the plan will be provided and should ensure that there is consistency with plans in adjoining areas.
9. Closely related to infrastructure provision is the theme of Cross boundary working. Issues of relevance to the council include housing and the shared Belfast Housing Market Area (BHMA), the metropolitan transport network and the environmental designations such as the approach to the management of Lough Neagh and other shared environmental assets. The Council has also highlighted the issue of cemeteries. The Council should be able to demonstrate that policy in respect of cross-boundary designations does not conflict with the DPDs of neighbouring councils as required. Cross boundary working is particularly important in securing wider regional planning objectives in relation to co-operation between areas.
10. These aspects have been highlighted by the Department in order to reinforce their importance to achieving an integrated and coordinated approach to higher-level regional planning aims and objectives. These matters also relate to Soundness and so the relevant tests from DPPN 06 are highlighted, as appropriate. The Monitoring framework for the plan is also referenced.
11. Detailed comments in relation to strategic operational policy matters are addressed in Annex 1 to this response.

Vision and Plan objectives

12. The Department acknowledges that the Vision for the Plan derives from a spatial analysis of the Council area with the objective of meeting the outcomes of the Community Plan.
13. Aligning the LDP with the Community Plan is one of the consistency tests of soundness. The six high level plan objectives as stated in 'A' – 'F' are clear and the Department welcomes the clear visual linkages to the Community Plan.

Strategic Policies and Spatial Strategy

C1 Did the council take account of the RDS?

C3 Did the council take account of policy and guidance issued by the Department?

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

14. The Department welcomes the overview of the elements of the spatial strategy including the provision of a settlement hierarchy, defining development limits and allocating land for housing growth in accordance with the sequential approach of the RDS.
15. The Council should however consider whether the strategic housing allocation, which includes a significant housing element within mixed use site at SMU1, is supportive of this sequential approach. This issue is discussed later in this response.
16. Paragraph 23.2 of DPPN 07 'The Plan Strategy' states that the PS should contain maps which provide clarity on the council's strategic policies and proposals where the proposals for development of land can be expressed spatially. It is also recommended that the PS should contain an Overview Map to show the plan area boundary and strategic proposals as well as any environmental designations to show specific areas of environmental protection which have been designated by DOE.
17. The Department welcomes Map 4 showing strategic designations and high level zonings including strategic mixed use sites and also Map 5 which shows the settlement hierarchy of Lisburn and Castlereagh City Council.

18. The depiction of the settlement hierarchy is also welcomed with Lisburn City as the top tier of the hierarchy followed by the greater urban areas of Lisburn and Castlereagh followed by the three towns of Carryduff, Hillsborough & Culcavy, and Moira followed by 13 villages and 33 small settlements. However, clarification is requested in relation to the third column of Table 1 entitled '% of District Total'. This appears to be neither the population nor number of households in each settlement as a proportion of the overall district. It also appears not to accord with the growth allocated as part of the strategic housing allocation. Clarification would therefore be welcomed.
19. The Council's undertaking of strategic settlement appraisal using the RDS spatial framework and associated hierarchy of settlements and infrastructure wheel is also noted.

Objective A: – A Quality Place

P2 Has the council prepared its Preferred Option Paper and taken into account any representations made?

C1 Did the council take account of the RDS?

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 councils district or to any adjoining councils district?

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 relative alternatives and are founded on robust evidence base.

20. The Department welcomes in principle 'Plan Objective A' in seeking to deliver homes that provide sustainable communities.
21. Action 3 'to provide strategic growth at West Lisburn / Blaris including the delivery of new homes' is however contrary to the RDS 2035 which seeks to protect this site as a key location for economic growth (SFG1). This aspect is addressed later in this response.

22. The document indicates clearly the linkage with the themes set out in the Community Plan and the policy context including the RDS and SPPS. The Department welcomes the acknowledgement of RG8 which seeks to achieve sustainable housing development including promotion of more housing development within existing urban areas, encouraging compact urban forms, and promoting more housing within existing urban areas. The Council should however consider if the strategic housing allocation, which includes housing within SMU01 is overall supportive of compact urban forms and a sequential approach to development.

West Lisburn Framework 2018 (draft)

23. The West Lisburn Development Framework Review 2018 (draft) is identified within the policy context. The Department understands that this draft framework has been not yet been finalised. It is noted that map 07 showing the strategic mixed use designation SMU01 at West Lisburn / Blaris differs in character/extent from the WL10 housing zoning in the 2015 West Lisburn development framework. The framework is however, a non-statutory document.

Strategic Policy 08 Housing in Settlements

24. The Department notes Strategic Policy 8 'Housing in Settlements' which indicates that the plan will support development proposals that are in accordance with the Strategic Housing Allocation and which encourage compact urban forms and appropriate densities. Further consideration of the proposed residential development within the proposed Strategic Mixed Use Site at West Lisburn / Blaris (SMU01) is provided below in the section relating to Objective B – A Thriving Place.

Strategic Housing Allocation

25. The Council indicates that the allocation of housing growth across the Council area has been informed by eight indicators provided in the SPPS. Comments are made on them as follows:

RDS Housing Growth Indicators

26. The Department welcomes acknowledgement of the Regional Development Strategy Housing Growth Indicators (HGI) providing a guide for residential accommodation and that it applies to both housing in settlements and the countryside. This accords with

the advice in the methodology paper accompanying the 2012-based HGI which identifies that the figures are indicators that should be used for guidance rather than seen as a cap on housing development in the area or a target to be achieved.

27. The Department also welcomes the commissioning by the Council of a Housing Growth Study in order to examine the robustness of the HGI. It is noted that the purpose of the study was to update the 2012-based HGI through the use of 2016-based household projections data together with adjustments set out in the 2012 HGI methodology. The study identifies a baseline future housing growth of 10,380 which was rounded up to 10,500 or 700 dwellings per annum. This figure is comparable with the refreshed HGI published by the Department on 25 September 2019 which indicates 10,700 dwellings albeit over a 15 year period from 2016 to 2030 inclusive.
28. The Department acknowledges the work of the council to update the 2012-based HGI with 2016-based household projections data. In accordance with the advice in the Chief Planners update of November 2019, it will still be important that the council demonstrate that account has been taken of the revised HGI indicators, alongside all other relevant evidence gathered to date, to justify the housing requirement in its draft plan strategy.
29. Please also see comments in the attached Annex 1 which detail comments in relation to the Housing Growth Study, including some important differences in the methodology between the 2012 and 2016 based HGI which are not reflected in the adjustments made by the council.
30. The Department notes the approach of the council in applying a 'buffer of 10% oversupply' to the housing figure indicated by the Housing Growth Study. The Department in principal supports an approach that provides for a level of additional flexibility to account for non-delivery and other unforeseen issues. The level of flexibility allowance should however be carefully justified by the plan evidence. Through applying the 10% buffer, the council indicate that the overall strategic housing allocation figure (SHA) is 11,550 units and that this figure is slightly under the potential units remaining of 11,578. It is noted that this figure includes housing at the proposed strategic mixed use site at West Lisburn / Blaris but excludes potential capacity from urban capacity sites and windfall.

Allowance for existing housing commitments

31. The Council state that the Housing Monitor (using the baseline of 31st March 2017) identified that in total 8,081 units are committed (with planning permission) with a further 1,108 potential units remaining on zoned land not committed. This results in a total of 9,189 units. When taken together and allowing for the potential in villages, small settlements and open countryside the Council states that the figure rises to 11,367.
32. Reference to potential units on zoned land not committed (zoned land with no planning permission as of 31st March 2017) is somewhat confusing in this section relating to existing commitments. In taking account of commitments Council should have regard to housing already constructed, existing housing approvals not yet constructed and housing where proposals have achieved a reasonable expectation of approval.
33. In keeping with the above Council is reminded that the allowance for existing commitments should also include dwellings built from the base date of the plan. Clarification within this section of this number of such units would therefore be welcome. This would help to make clear the residual housing requirement over the remaining plan period. The Department assumes that these completed dwellings are not included within the figure for commitments as it would not be appropriate to apply a non-delivery discount to dwellings that have already been completed.
34. The Department accepts the Council's approach to applying a non-delivery allowance. This allows existing commitments to be taken into account without assuming that all will necessarily contribute to meeting the identified housing need over the plan period. It can avoid an over-reliance on existing commitments to meet need and help inform judgements in relation to the amount of additional housing land to make available. However, its use is generally to discount a proportion of existing commitments (planning approvals) that are considered unlikely to be built taking into account local evidence. The Department notes from Table 3 'Strategic Housing Allocation over the Plan Period' that the discount is applied to other potential units on land that would not generally be considered committed (such as land zoned for housing without a planning approval and dwellings in the countryside). The Department would ask the Council to further clarify and justify this approach.

Urban Capacity Studies

35. The Department welcomes the acknowledgement that an Urban Capacity Study (UCS) to inform the LDP is a requirement of the SPPS and PPS12 Housing in Settlements. Such studies provide a comprehensive analysis of the potential for future housing growth within the urban footprint. The UCS relate to the urban footprint of Lisburn City, the Castlereagh Greater Urban Area and the three towns of Carryduff, Moira and Hillsborough & Culcavy. There is some further discussion of the UCS in Annex 1.

Allowance for windfall housing

36. Welcome the allowance for windfall assessment which broadly reflects the guidance set out in SPPS and PPS12. Windfall housing can make up an important part of the supply of housing. In line with the objectives of the RDS, it is necessary to make allowance for this when deciding the number of sites to identify for development in the plan in order to prevent excessive allocation of housing land. The approach of the council in identifying both small scale and larger scale windfall is welcomed. It is noted that the UCS indicates that over the plan period 2017 – 2032 a potential 240 additional dwellings on small windfall sites and 1,605 on larger sites may come forward. Clarification of the decision to apply a discount allowance to this figure would be welcomed as well as the methodology that was used to further adjust the figure to ensure no double counting.

Housing Needs Assessment / Housing Market Analysis

37. The Department welcome the acknowledgement of the need to take account of Housing Needs Assessment (HNA) and Housing Market Analysis in accordance with the RDS, SPPS and PPS12.
38. The Department fully supports the commitment in the plan objectives to delivering sustainable communities and new homes in a range of types and tenures, including affordable housing. Clarification is requested of the statement that the total affordable housing requirement for the period is 6,240 as this figure appears not to be contained within the Housing Growth Study technical supplement. It is noted that the delivery of affordable housing and in particular the social housing element will largely depend upon zoned sites remaining to be developed, urban capacity sites and windfall. It is

also indicated that additional land may be zoned for affordable housing at LPP stage in consultation with NIHE. Please see comments in respect of SMU01 West Lisburn / Blaris and additional comments made in respect of HOU10 in Annex 1.

Application of a sequential approach

39. The Department welcomes acknowledgement of the sequential approach however seeks clarification in the justification of additional strategic housing growth at West Lisburn / Blaris. Whilst it is noted that the Council state that the Strategic Housing Allocation presented in Table 3 negates the need to provide any greenfield extension to allow for future housing growth, it is also the case that the RDS 2035 identifies lands at West Lisburn / Blaris as a key location for economic growth that is to be protected in order to strengthen the role of the wider BMUA as a regional economic driver. In view of the RDS guidance in respect of land at this location the Department would ask whether consideration was given to the identification of other alternative land beyond the urban footprint in the event that this is would be required to meet residual need once urban capacity yield, windfall allowance and dwellings already constructed or committed have been taken into account.

Meeting future housing need

40. Table 3 entitled 'Strategic Housing Allocation over Plan Period' does not detail the preferred distribution of the strategic housing allocation figure set for the district of 11,550 units. The table instead appears to summarise the analysis of potential units remaining, potential units on urban capacity sites, and windfall potential which are each discounted by 10% to account for non-delivery. In addition it includes an allowance of 1,350 (also discounted) to account for the strategic mixed use zoning proposed for West Lisburn / Blaris. Council may wish to consider whether the preferred distribution of housing growth across the district is best represented by the discounted or non-discounted figure. Overall the Department would welcome clarification of the relationship of this table to the strategic housing allocation.

41. Notwithstanding the reduction for potential non-delivery, this table indicates that when existing commitments, urban capacity sites and windfall potential across the district are taken into account, the total potential for the district (including an allowance for the countryside) is approximately 12,400. This is more than the strategic housing

allocation figure of 11,550 indicated by Housing Growth Study (which includes a flexibility allowance of 10% in addition to the baseline housing growth).

42. When the residential growth of 1350 units provided for by the West Lisburn Site are included (1500 units without discount) this results in an overall total potential of 13,782 units or some 131% above the baseline housing growth requirement. In light of the above, clarification is requested in relation to the Council's position that residential development at West Lisburn is required to meet the identified need over the Plan period. The Department notes paragraph 9.14 of the Housing Growth Study suggests that without the West Lisburn / Blaris site supply in Lisburn is insufficient to cover the full plan period (12.5 years supply based upon past trends in the distribution of growth). It appears from Table 3 that when potential units remaining, potential from urban capacity sites and projected windfall are taken into account for both Lisburn City and Lisburn Greater Urban Area there is a potential of approximately 5,600 units (inclusive of a 10% reduction). Applying the average past delivery trends for Lisburn set out in Table 9.1 of the Housing Growth Study to this figure would appear to indicate approximately 14.9 years supply. This includes the 10% allowance for non-delivery.
43. If the provision of housing at West Lisburn / Blaris is to be justified on the basis of securing other wider plan objectives in relation to economic growth or social housing provision this is unclear from the commentary within the plan.

Objective B: – A Thriving Place

P2 Has the council prepared its Preferred Options Paper and taken account any representations made?

C1 Did the council take account of the RDS?

C3 Did the council take account of policy and guidance issued by the Department?

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 relative alternatives and are founded on robust evidence base.

44. The strategic policies in this section focus on driving sustainable economic growth for the Council area. Actions have been identified that aim to focus this in the most appropriate locations.
45. The promotion of mixed used development at West Lisburn and Purdysburn with appropriate employment uses to facilitate economic growth is one of the actions highlighted as key for the Council.

Policy SP11 Economic development in settlements

46. The Department notes and generally supports the emphasis within the policy on supporting development proposals that promote the strategic mixed use sites at West Lisburn / Blaris and Purdysburn in accordance with key site requirements and also the local employment sites throughout the council area. However, the detail of the SMU01 West Lisburn / Blaris policy is examined further below.
47. The J & A to this policy states that the plan retains a continuous supply of employment land which will continue to meet the district economic needs throughout the plan period and beyond. The strategic mixed use sites will serve to attract inward investment while local employment sites will help support local employment needs.

Strategic Employment Allocation

48. The Department notes the hierarchy of strategic employment sites outlined in the draft Plan Strategy through the identification of Strategic Mixed Use sites (SMU) and Local Employment Sites.
49. The Council commissioned Lichfields to undertake an Economic Land Review to inform the emerging LDP with particular regard to the current economic situation, the future needs of the local economy and the requirements for employment land over the 2017-2032 plan period.
50. With regard to the Employment Land Review (ELR), the document clarifies that it focuses on sites zoned in the existing development plan, and that these zonings are carried forward under transitional arrangements. The ELR identifies that there remains 220ha of developable land (within the zonings) for economic use, and that a series of scenarios were explored to quantify future employment land requirements over the plan period. Whilst the Council considers that none of the scenarios can be given

certainty as 'their subsequent outcomes are merely forecasts', the dPS indicates that Scenario 5, which forecasts a need of 44.85ha of developable land over the plan period, is considered to be the most appropriate and likely forecast outcome.

SMU01 West Lisburn / Blaris

51. This is one of three Strategic Mixed Use policies introduced by the Council within the draft Plan Strategy. The plan proposes strategic mixed use for approximately 100 hectares of land at West Lisburn.
52. SMU01 states that the site will be developed in accordance with an overall concept masterplan which includes key site requirements detailed by the policy. These key requirements include the provision of approximately half of site for employment uses (industrial and business /light industrial /storage and distribution) and half of the site for residential uses with some ancillary small scale retailing and healthcare. The relevant use classes are stipulated.
53. The provision of the M1 Knockmore link road is a key site requirement cited as central to development of the site and the Council states this will unlock the development potential of this zoning and West Lisburn in general.

Regional context

54. The RDS 2035 identifies West Lisburn / Blaris as being one of a number of major employment/industrial locations that support the role of the BMUA as the regional economic driver. It also recognises the benefits of Lisburn from its location at the meeting point of the Belfast / Dublin economic corridor and the East / West transport corridor. SFG1 states that key locations (including West Lisburn / Blaris) should be identified and protected for economic growth.

Draft BMAP

55. The site is designated as a major employment location (MEL) in draft BMAP. MEL sites were also identified in the Belfast Harbour Estate, Global Point / Ballyhenry and Purdysburn. The location of MEL's at regional gateways and along major transportation corridors were considered necessary to facilitate the creation of new employment at sustainable and assessable locations and support the RDS on the issue.

Principle of residential use at West Lisburn

56. In light of the existing protection and designation covering the site the Department would query the rationale for mixed use and the proposed development of approximately half of the site for residential use.
57. The strategic housing allocation for the plan is referred to at paragraph 25 of this response.
58. The Department notes the statement by the Council that in order to facilitate the Council's strategic economic ambition, 50ha of land is identified for residential use at West Lisburn which could accommodate 1500 units. It is stated also that this level of housing growth will help to support associated economic growth. Clarification of how housing growth can support the economic development of this mixed-use site would be welcomed.
59. Paragraph 9.14 of the Housing Growth Study states that whilst the supply in Lisburn appears to be healthy, it is lower than in other areas and is not sufficient to cover the full plan period without the West Lisburn site (12.5 years supply without west Lisburn).
60. This section states that the Housing Growth Study (Technical Supplement 1) provides further detail regarding the proposed housing growth within the plan area. It also identifies the West Lisburn / Blaris site as a key area of future strategic growth and a priority for the council. The Housing Growth Study paper states that without West Lisburn there is only a 12.5 year supply based upon the Lisburn's share of distribution of past growth trends.
61. The proposed housing allocation for West Lisburn is the largest single allocation of units throughout the plan area. However, taking account of the information presented in Table 3 'Strategic Housing Allocation over Plan Period' in relation to units remaining from planning approvals and potential from unzoned land, along with the potential residential capacity from both urban capacity sites and from windfall development, there would appear to be sufficient supply to meet the SHA of 11,550. The Department therefore considers that the evidence or information justifying the need for residential development at West Lisburn / Blaris is presently unclear.
62. The Department acknowledges that at the Public Inquiry on draft BMAP the former Department of Environment agreed with objectors that the zoning should be for mixed

use. Importantly, however, the Planning Appeals Commission report on the Inquiry highlighted the importance of this location for the employment strategy of the Belfast Metropolitan Area and Northern Ireland as stated in the RDS. The report also concluded that the site is one of two crucial zonings of new employment land on the periphery of the Metropolitan Area. The PAC concluded that such prime locations providing optimum employment land are rare, in contrast to the wider range of available housing land.

63. The inquiry report therefore concluded that no part of this zoning or any additional lands around the zoning should be allocated for housing in the Plan, due to the reasons stated above.
64. As the regional planning position in respect of these lands remains unchanged in the RDS, clarification is requested from the Council on the justification for the proposed designation as a mixed use site comprising up to 1500 residential units.
65. Furthermore, it is noted that there is no requirement for any masterplan to outline the proportion of dwellings to be provided as affordable (including social) tenure. In view of the fact that one of the key findings of Housing Growth Study is that the issue of social housing need is currently much greater in Lisburn, can the council further clarify the reason for this apparent omission? This is especially significant in light of the evidence presented in the Housing Growth Study that Lisburn supply is reliant on 'ongoing' sites, representing 98.5% of potential supply (excluding west Lisburn).

Strategic Policy 13 - Mineral Development

66. The Department welcomes and acknowledges that the Council's strategic policy aligns with that of overarching regional policy, supporting the strategic objectives for mineral developments as set out in the SPSS (para 6.152).
67. The Council highlight that a lignite deposit is a strategically significant resource albeit one that is highly unlikely to be developed in the near future, but notes that no reference is made within operational policies for valuable mineral development to lignite.
68. Furthermore the Council refer to ongoing work in relation to the minerals evidence base. This work has been established through the positive collaboration between government departments and local councils as part of a Minerals Forum. The Council

note a number of areas most at risk from mineral development (including the Lagan Valley Regional Park) however it is unclear whether these are already covered by an existing Area of Constraint on Mineral Development (ACMD). The Council should consider and make clear the status of existing ACMD's and/or Areas of Mineral Safeguarding. The Department acknowledge that further work will be taken forward at the Local Policies Plan stage.

Objective C: A Vibrant Place

C1 Did the council take account of the RDS?

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 councils district or to any adjoining councils district?

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 relative alternatives and are founded on robust evidence base.

69. This strategic objective outlines actions which will help to grow the city and town centres, retailing and other uses within the city.
70. Action 6 detailed under plan objective C supports the role of Sprucefield as a regional retail destination at a key strategic location within Northern Ireland. The document acknowledges that the RDS states that Sprucefield will continue to retain its status as a regional out of town shopping centre.

Strategic Policy 14 Town Centres, Retailing and Other Uses

71. The plan will support development proposals that:
- (a) will promote town centres, retailing and other uses within the City and town centres to enhance their vitality and viability in accordance with their role and function in the retail hierarchy; and
 - (b) support Sprucefield Regional Shopping centre in recognition of its regional status in accordance with key site requirements.

72. Criteria (a) takes account of the regional strategic objectives set out in the SPPS which are to secure a town centre first approach and other main town centre uses. However, it is unclear if there is a hierarchy within this policy with preference given to centres over the Sprucefield Regional Shopping centre. This is an ambiguity which is not clarified by the presentation of the retail hierarchy on page 97 of the document.

The Retail Hierarchy

73. Paragraph 6.277 of the SPPS requires LDPs to define a network and hierarchy of centres along with a number of further requirements including, defining the extent of centres and providing appropriate policies for the retail hierarchy.

74. The proposed retail hierarchy is set out in Figure 5. Lisburn City centre primary retail core / retail frontage and Lisburn City centre are presented as the top tiers of the hierarchy. The retail capacity study undertaken by the Council has highlighted the need to improve infrastructure within the city centre and to support the retail offer with leisure and complementary uses. District centres are presented as the 4th tier, and the Council states that a possible extension to the district centre of Forestside will be considered at local policies plan stage. The Council is reminded that the SPPS states that district and local centres should be retained and consolidated for local everyday shopping, ensuring that these are complementary to the role and function of the town centre. Extensions therefore should only be permitted where the applicant has demonstrated that no adverse impact will result on town centres in the catchment.

75. The Department notes that the retail hierarchy omits Sprucefield Regional Shopping centre which is discussed further under SMU03 below.

Policy SMU03 Sprucefield Regional Shopping Centre

76. This strategic mixed use policy sets out key site requirements for development proposals within Sprucefield Regional Shopping centre.

77. It is stated that Sprucefield falls outside the hierarchy of centres set out in the SPPS. As outlined above, it has not been considered within the retail hierarchy set out in the draft Plan Strategy, however the Council considers that the Plan should define its role.

78. The Council refer to UK regional and sub-regional guidance to assist in defining out of centre shopping centres. The Council considers comparative regional out of town

shopping centres (over 50,000 square metres gross retail area) as characterised by proximity to transport links, free parking and a substantial retail and leisure offer.

79. The retail study commissioned identified that Sprucefield is functioning as a regional shopping centre which has the potential to expand and therefore retain and reinforce this status. Additional potential uses include further retail development, additional sport and leisure development (including hotel / concert venue) and car showrooms. It is considered that this mix of uses recognises the shift in retailing preferences, patterns and trends requiring a more holistic approach.

Regional and strategic policy context

80. SFG1 of the RDS states that Sprucefield will continue to retain its status as a regional out of town shopping centre. While the SPPS does not specifically reference Sprucefield or regional out of town shopping centres, it does promote the need for a town centre first approach for retail and other main town centres uses, while retaining and consolidating existing and district local centres ensuring their role is complementary to the function of the town centre.
81. The key site requirements for SMU03 propose a relaxation of the current planning policy context for development proposals at Sprucefield contained in draft BMAP. At present these include a restriction on the type of goods to be sold, a minimum floorspace requirement and a condition precluding the subdivision of units under the floorspace requirement. These policy criteria are underpinned by the strategic policy of the SPPS.
82. It is noted in line with paragraph 6.283 of the SPPS that all applications for more than 1000 square metres gross floorspace will be subject to a retail impact assessment. However, the council may wish to consider further the impact of the proposed policy approach on the retail hierarchy and existing centres within the district.
83. The J & A for the policy states the Council's intention that Sprucefield will perform at the appropriate level and in a manner that is consistent with the SPPS objective of supporting and sustaining existing centres. However, consideration needs to be given to how proposals for applications at Sprucefield will be assessed in conjunction with the retail hierarchy, particularly as the draft plan strategy is silent on this issue.

Objective D: An Attractive Place

C1 Did the council take account of the RDS?

C3 Did the council take account of policy and guidance issued by the Department?

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.

84. This objective aims to promote sustainable tourism, open space, sport and recreation and outlines the actions that the Council consider will help drive these.

Tourism

85. The SPSS (Paragraphs 6.257 and 6.263) requires councils to bring forward a tourism strategy in the preparation of their LDP. The Department acknowledges that the Draft Northern Ireland Tourism Strategy 2020 is still to be finalised and will welcome a revised draft that would align more closely with up-to-date timeframes.
86. The 'Lisburn & Castlereagh City Council Tourism Strategy' 2018 is highlighted as a blueprint for developing tourism across the Council area and this section sets out a summary of the Council's Tourism Strategy as the 'Vision for Tourism 2018 – 2022'. However, the strategic document itself is unavailable to view and the Department would welcome clarification on the current status of the Council's Tourism Strategy.
87. The Tourism Strategy should consider how to facilitate the growth of sustainable tourism, as identified in the SPSS.

Strategic Policy 16 Tourism

88. The Council refer to a number of ongoing and planned initiatives as well as potential opportunities for tourism growth, including assets such as Hillsborough Castle, Lagan Valley Regional Park, and the Lagan Navigation and the associated 'Discover Waterways Lisburn' project. The policy also outlines the desire to increase tourism accommodation, particularly in the form of hotels, in order to meet demand.
89. This strategic policy supports the tourism aims and objectives as set out in the SPSS. It indicates the promotion of appropriate tourism proposals as well as the Council's

Tourism Strategy, subject to compliance with the operational planning policies contained in Part 2 of the Plan Strategy. The Council should ensure that the operational policies in turn also support SP16.

Objective E: A Green Place

C1 Did the council take account of the RDS?

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 councils district or to any adjoining councils district?

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.

90. This objective outlines the actions that the council intend to adopt in order to enhance and protect the historic and natural environment within the council area.

Strategic Policy 19 Protecting and Enhancing Natural Heritage

91. The SPPS seeks to protect, conserve, enhance and restore the abundance, quality, diversity and distinctiveness of the region's natural heritage. It is noted that SP19 does not refer to diversity of natural heritage as specified within the regional strategic objectives relating to natural heritage. The strategic policy should include an objective that ensures that natural heritage and associated diversity are conserved and enhanced particularly in line with the SPPS (para 6.172).

92. Similarly, it is noted that SP19 does not refer to actions to reduce carbon footprints as specified within the regional strategic objectives relating to natural heritage.

93. The Department notes that the Lagan Valley Regional Park falls within the Council's AONB. The LVRP Local Plan is the statutory development plan for the park and that it will cease to have effect once the LPP is adopted. It is noted that policy SP16 Tourism refers to the LVRP and that policies regarding it will come forward at LPP stage. However, in the context of Natural Heritage, no reference is made to any subsequent LVRP policies that may follow at the LPP stage.

94. There may therefore be merit in including separate operational policy in light of SP19 d) *'safeguard the Lagan Valley Regional Park allowing appropriate opportunities for enhanced access at identified locations thereby protecting their integrity and value'*, tailoring policy to local circumstances.

Objective F: A Connected Place

C1 Did the council take account of the RDS?

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 councils district or to any adjoining councils district?

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 relative alternatives and are founded on robust evidence base;

CE3 There are clear mechanisms for implementation and monitoring.

95. This plan objective refers to supporting sustainable transport and other infrastructure and outlines the actions that Council will adopt to promote this within the Council area. Ten actions are referenced and are all positive and welcomed. The intention is that delivery of the objective will be through five strategic policies including Transport Infrastructure.

Transport Infrastructure

96. The Policy Context references the 'Regional Development Strategy 2035' (RDS), 'Ensuring a Sustainable Transport Future – A New Approach to Regional Transportation' as well as the 'Strategic Planning Policy Statement for Northern Ireland' (SPPS). These strategic references are useful in 'setting the scene' to stress the importance of sustainable travel and the integration of transport and land use planning.
97. As part of the Belfast Metropolitan Area, the reference to the on-going engagement with DfI on the Belfast Metropolitan Transport Plan is acknowledged and whilst there are a number of key proposals listed for the next stage of the plan process, continued

engagement and discussion with DfI Transport and Roads would be required in order to ensure viability of schemes.

98. The Department notes that draft strategies including a Car Parking Strategy, West Lisburn Development Framework Review and Lisburn City Centre Masterplan are referenced. The weight afforded to these documents in decision making will vary and council should consider this accordingly.

Strategic Policy 20 Transportation Infrastructure

99. Council indicates that the Plan will support development proposals that aim to support sustainable transport and integration with land use.
100. The Local Transport Study (LTS) that has been prepared by DfI in consultation with the Council is acknowledged and the seven objectives to support the Councils Plan Strategy are outlined as are the ten confirmed measures identified in the LTS. The Department acknowledges that the LTS does not list specific schemes however will provide an overview for the specific policies that will come forward at the LPP stage of the Plan. How these link to the operational policies is important.
101. The Belfast Metropolitan Transport Study (BMTS) has been referenced and the modelling explained in simple terms. Whilst schemes have been identified and outlined it is important that the Council has highlighted that further work is required to determine the most appropriate demand management approach for the BMTS area to maximise the modal shift to sustainable modes of travel while supporting local growth and trade. Continued engagement with DfI and the other metropolitan councils is encouraged.
102. Key Transportation Infrastructure Schemes, including park and ride schemes that the Council identify as important have been listed and the council should continue to liaise with the Department's Transport and Roads sections in respect of these schemes. The attached representations from Transport and Roads also make reference to these issues.
103. Regional Strategic Policy within the SPPS in relation to protected routes is to restrict the number of new accesses and control the level of use of existing accesses onto such roads. On motorways and high speed dual carriageways an exception may be considered for service areas where there is a demonstrable need. For other dual

carriageways or ring roads, through passes and by-passes, permission will be given if a proposal is considered to be regionally significant.

Strategic Policy 21 Renewable Energy

104. The Department acknowledges that SP21 proposes that a precautionary approach will be applied for all renewable development proposals, which varies slightly from the SPPS 'cautious approach'. SP21 continues to detail that renewable proposals will be assessed through operational policies RE1 & RE2 however there is no reference to either a precautionary approach or cautious approach relating proposals within designated landscapes.

Cross Boundary working

105. Consideration of cross-boundary issues is a key test of soundness as outlined above, and Councils should have regard to other relevant plans, policies and strategies relating to any adjoining District and ensure that their policies and allocations are not in conflict with the DPDs of neighbouring Councils.
106. The RDS provides strong regional and sub-regional guidance through a Spatial Framework for Northern Ireland which divides the Region into 5 components based on functions and geography. Implementation depends upon effective joint working between Councils. This engagement is fundamental to ensuring that the aims and objectives of Council LDPs are integrated and provide a coherent, joined up approach to regional planning issues, including the policy approach to landscape and environmental designations. Such cross boundary working also ensures that LDPs do not conflict with each other and that potential areas of conflict are identified and resolved prior to a Development Plan Document being submitted to the Department to cause an Independent Examination. The Chief Planner's letter dated December 2016 refers.
107. The Council acknowledges that regard should be given to adjoining Councils' plans, policies and strategies and highlights that where cross boundary issues are relevant, it should be established if the LDP conflicts with plans of neighbouring Councils. The Council shares common land boundaries with 5 Councils: Antrim and Newtownabbey Borough Council, Ards and North Down Borough Council, Armagh City, Banbridge and Craigavon Borough Council, Belfast City Council and Newry Mourne and Down District

Council. Part of the Council Area is located within the Belfast Metropolitan Urban Area and this is recognised within 'A Connected Place' section of Part 1 of the document.

108. The Department acknowledges that a 'Consultation and Engagement Strategy with Neighbouring Councils' has been developed and that this has provided the Council with an opportunity to discuss cross boundary issues and matters of collective interest – all of which are a test of soundness.
109. Collaborative working with other Councils in relation to the management of Lough Neagh is welcomed. Furthermore, it is acknowledged that the Council attends the Metropolitan Area Spatial Working Group and Minerals Working Group. The work of these groups should be able to demonstrate a recognition of shared resources and environmental assets and the importance of a joined up approach to plan making.

Monitoring and Review

110. Council may revise its Plan Strategy or Local Policies Plan at any time (after adoption), or by direction by the Department. This requires councils to keep under review the implementation of their plans to ensure that LDP objectives are being achieved.
111. The Department notes the provisions in the draft Plan Strategy on monitoring and welcomes the range of issues identified within the proposed monitoring framework. DPPN 6 states that 'monitoring is essential for the delivery of the DPD and should provide the basis to trigger any requirement to amend the strategy, policies and proposals of the DPD'. The Department welcomes the focus on identifying targets and triggers in respect of the indicators presented. This will assist in measuring policy effectiveness.
112. In general whilst the inclusion of targets and trigger points is helpful careful consideration should be given to the wording of trigger points to ensure that they are clear and unambiguous and will allow for effective monitoring of the plan.

Extant planning guidance

113. The Department has clarified its position on the future of extant planning guidance and the Council should consider this in relation to references within the draft Plan Strategy.

114. The Department's website now sets out which guidance has been withdrawn, which will cease to have effect in a council area once the Council adopts its plan strategy and which guidance is retained, unless and until replaced by the Department.
115. In relation to guidance which will cease to have effect when the Council adopts its Plan Strategy, it is considered that this affords councils the opportunity to prepare local guidance on such matters, if so desired.
116. Further detail on each piece of guidance can be found at:-<https://www.infrastructure-ni.gov.uk/articles/guidance-update>

TPMU Comments on Lisburn & Castlereagh City Council Draft Plan Strategy

INTRODUCTION

DfI Transportation Planning and Modelling Unit (TPMU) have prepared comments on Parts 1 and 2 of the Lisburn & Castlereagh City Council Draft Plan Strategy (LCCC DPS). The comments have been structured and numbered using the headings from DfI Guidance on the preparation of LDP policies for transport:

1. Integration of land use and transportation
2. Active Travel Networks
3. Park & Share and Park & Ride
4. Creating an Accessible Environment
7. Safeguarding new transport schemes
8. Disused Transport Routes
9. Transport Assessments & Travel Plans
10. Walking & Cycling Provision
11. Provision of public and private car parks

Whilst 1. Integration of land use and transportation, relates to Part 1 of the LCCC DPS, the remaining subject headings relate to Part 2. The structure of this document also includes a number of Other Comments.

DfI TPMU consider that the content of the DPS poses a risk to soundness under Test C3 as outlined below.

PART 1 – STRATEGIC POLICIES

1. Integration of land use and transportation

The integration of land use and transportation should be a key element of the Draft Plan Strategy which advances strategic proposals regarding the location of development. It would be expected to find a number of references to “integration” in Part 1 of the document in terms of Strategic Policies. It is positive that there are references to “integration”, “location of land-uses”, “access to local facilities” and “well connected neighbourhoods” spread across Strategic Policies 01 – 05, however there would appear to be no clear objective measure as to how these issues will be assessed or achieved.

In particular the DfI’s proposed best practice policy approach: “Accessibility Analyses should be employed to assist in the identification of appropriate development sites where integration with public transport, cycling walking and the responsible use of the private car can be best achieved” appears absent from the document. This is a major omission. Whilst it may be inferred from the Operational Policies that zonings and development will in general only be permitted within existing settlement limits and therefore accessibility analyses are largely redundant, this is not explained or substantiated in the document. In practical terms it is not clear on what basis the location of zonings will be undertaken.

The Spatial Strategy (p47) claims to support the development of sustainable locations. Indeed the final bullet point undertakes to “promote, influence and deliver a shift to more sustainable travel modes and integrated land use proposals in accordance with regional transport policy, promoting

TPMU Comments on Lisburn & Castlereagh City Council Draft Plan Strategy

reduced reliance on the private car". However there is no firm evidence in the wording of the Strategic Policies that follow that these principles will be acted upon or could be upheld.

For example:

- The Spatial Strategy is unclear regarding how the allocation of development (Housing – Table 3) relates to current patterns – indeed the addition of West Lisburn / Blaris appears to be a major divergence.
- SP08 Housing in Settlements – there is no evidence of consideration of transport accessibility in decisions on location and the reference to Transport Assessment (p61) relates to individual development proposals
- SP09 Housing in the Countryside – there is no mention of the importance of accessibility by public transport
- SP10 Education, Health, Community and Culture – there is no mention of the importance of transport accessibility (by modes other than private car)
- SP11 Economic Development in Settlements – is unclear in that locations are not limited to settlements but rather "a range of locations"

Other Comments - Commuting Flows to Belfast

There appears to be no reference (in paras 2.77 – 2.82) to the heavy commuting flow to Belfast and the capacity of the transport networks – they are already at capacity at peak times. Neither is there reference to Belfast City Council proposals to add substantial employment which is likely to generate additional commuting flows, including from Antrim & Newtownabbey. DfI has reported this in the Belfast Metropolitan Transport Study which has been shared with LCCC. This is a significant omission from the DPS in terms of the transport context.

Other Comments – SMU01 West Lisburn / Blaris

The importance of the overall Concept Masterplan for the site incorporating a Transport Assessment cannot be overstressed. DfI is currently engaged with LCCC regarding how this site can be developed in line with the DfI's priorities for transport and the wider Draft Programme for Government outcomes. A primary concern is the impact on traffic congestion on the M1 and the provision of improved public transport in terms of West Lisburn station, additional trains, and Park & Ride at Sprucefield. These issues also relate to DfI's Belfast Metropolitan Transport Plan (BMTP) which will deal with the transport demands of the wider Belfast Metropolitan area.

PART 2 – OPERATIONAL POLICIES

2. Active Travel Networks

A commitment or direct reference to the DfI's best practice policy approach "LDPs should identify active travel networks and provide a range of infrastructure improvements to increase use of more sustainable modes. In particular, within urban areas, providing enhanced priority to pedestrians, cyclists and public transport and an acceptable level of parking provision which is properly managed" appears missing from the document.

TPMU Comments on Lisburn & Castlereagh City Council Draft Plan Strategy

Whilst there will be potential to identify such measures in DfI's Local Transport Plan at the next stage the LDP should give an undertaking that the Council will undertake this work in conjunction with DfI and that the Active Travel Networks will be published in the Local Policies Plan document.

This issue is related to 10. Walking and Cycling Provision but is quite different nevertheless.

3. Park & Share and Park & Ride

DfI is content that this matter is covered satisfactorily under TRA9.

4. Creating an Accessible Environment

DfI is content that this matter is covered satisfactorily under TRA1 although it is noted that there is no reference to cycle access.

7. Safeguarding new transport schemes

DfI is content that this matter can be covered satisfactorily under TRA4 by adding reference to the forthcoming Local Transport Plan and the new BMTP.

8. Disused Transport Routes

DfI is content that this matter is covered satisfactorily under TRA5.

9. Transport Assessments & Travel Plans

DfI notes that this is covered by TRA6. DfI would prefer to see the reference to Transport Assessment noted under a general provision covering all themes. Alternatively DfI suggest it should appear at the front of the Transport theme section with supporting text to explain that it applies to all forms of development with a significant travel generation impact.

Additionally DfI would like the supporting text to make clear that a primary aim of the Transport Assessment is firstly 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.

10. Walking & Cycling Provision

DfI is content that this matter is covered satisfactorily under TRA8. It is noted that this policy refers to public transport provision which is included in the headline policy wording but not in the sub-clauses. This issue is related to item 9. Transport Assessments & Travel Plans.

11. Provision of public and private car parks

DfI is content that this matter can be covered satisfactorily under TRA10 by adding "and the Council's Parking Strategy where applicable".

LISBURN AND CASTLEREAGH CITY COUNCIL DRAFT PLAN STRATEGY

Comments provided by Department for Infrastructure, Rivers.

December 2019

The Department for Infrastructure, Rivers has reviewed the contents of the Lisburn & Castlereagh City Council Draft Plan Strategy and comment as follows.

Department for Infrastructure, Rivers considers the Draft Plan Strategy overall to be sound there are however a number of issues detailed below which the Council will wish to consider

DPS Part 1 Chapter 4 Strategic Policies and Spatial Strategy

Strategic Policy 24 Flooding

DfI Rivers agrees in general with Strategic Policy 24, however flood risk associated with development in proximity of a controlled reservoir should have been included.

DfI Rivers is an integral part of the Department for Infrastructure and not an Agency within DAERA as stated.

DPS Part 2 Operational Policies

16. Flooding

FLD1 Development in Fluvial (River) Flood Plains

Exceptions in Defended Areas

DfI Rivers agrees with much of this Policy however, under Exceptions in Defended Areas, references to a 1 in 100 year flood event should also include the term (AEP of 1%) Annual Exceedance Probability, *i.e. 1 in 100 year (AEP 1%) fluvial flood....*

Flood defences which protect previously developed lands are identified on Flood Maps NI.

Flood Risk Assessments

It is considered the following is better located within policy rather than justification an amplification

A Flood Risk Assessment (FRA) may also be required when a proposed site is close to the margins of floodplain depicted as strategic floodplain in Flood Maps NI and a more accurate definition of the extent of potential flooding is needed

Justification and Amplification

A fluvial floodplain is defined as the extent of flood event with a 1 in 100 year probability (1% AEP) ***plus climate change allowance***

DfI Rivers advises on the extent of river floodplains. ***Information on floodplains which take account of climate change is available on Flood Maps NI***

Defended Areas

There should be a presumption against development of greenfield sites within a defended area as this can expose more people and property to residual flood risk as well as removing valuable flood storage should flood defences be overtopped.

FLD2 Protection of Flood Defence and Drainage Infrastructure

Proposed policy aligns closely with existing Policy FLD 2 of Revised Planning Policy Statement 15 “Planning and Flood Risk” and the Flood Risk section of the Strategic Planning Policy Statement for Northern Ireland.

FLD3 Development and Surface Water (Pluvial) Flood Risk outside Flood Plains

Proposed policy generally aligns with existing Policy FLD 3 of Revised Planning Policy Statement 15 “Planning and Flood Risk” and the Flood Risk section of the Strategic Planning Policy Statement for Northern Ireland. Additional clarity could have been provided by including that when a DA is not required ***but there is potential for surface water flooding as shown on the surface water layer of Flood Maps Ni*** it remains the responsibility

FLD4 Artificial Modification of Watercourses

Proposed policy aligns closely with existing Policy FLD 4 of Revised Planning Policy Statement 15 “Planning and Flood Risk” and the Flood Risk section of the Strategic Planning Policy Statement for Northern Ireland.

FLD5 Development in Proximity to Reservoirs

While the proposed policy aligns closely with existing Policy FLD 5 of Revised Planning Policy Statement 15 “Planning and Flood Risk” and the Flood Risk section of the Strategic Planning Policy Statement for Northern Ireland, it does not reflect current thinking by Department for Infrastructure as advised to all Council Heads of Planning on 6th June 2019. In that the following wording may be useful to include in the LDP policy sections:-

New development will only be permitted within the potential flood inundation area of a “controlled reservoir”, as shown on the Strategic Flood Maps, if:

the applicant can demonstrate the condition, management and maintenance regime of the reservoir is appropriate to provide sufficient assurance regarding reservoir safety, so as to enable the development to proceed; or

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 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.

There will be a presumption against development within the potential flood inundation area of a controlled reservoir for proposals that include:

- ***essential infrastructure;***
- ***storage of hazardous substances; and***
- ***bespoke accommodation for vulnerable groups.***

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 a potential flood inundation area of a controlled reservoir provided demonstrated that there is no material increase in the flood risk to the development or elsewhere.

Comments prepared 23rd December 2019

Department for Infrastructure, Rivers. Planning Advisory and Modelling Unit.