



GRAVIS
PLANNING

BELFAST | DUBLIN

15th November 2018

Our Ref: C04042

Keith Sutherland
Development Planning and Policy Manager
Belfast City Council
Cecil Ward Building
4-10 Linenhall Street
Belfast
BT2 8BP



Dear Mr Sutherland,

Re: Response to the Belfast City Council Draft Plan Strategy (DPS) – Lands located at the Barnfield Road and Glenmona

This letter is submitted on behalf of our client, Braidwater Homes, and relates to the publication of the Draft Plan Strategy (DPS), the second stage in Belfast City Council's Local Development Plan process. It highlights how some draft policies are not sound and proposes how such policies could be amended to become sound. In addition to this we draw your attention to specific lands that we have identified as being suitable for affordable housing in order to contribute to the ambitious growth plans for Belfast as set out in the strategy.

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

Procedural Tests

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

Consistency Tests

- C1 *Did the council take account of the Regional Development Strategy?*
- C2 *Did the council take account of its Community Plan?*
- C3 *Did the council take account of policy and guidance issued by the Department?*
- C4 *Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?*

Coherence and Effectiveness Tests

- CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;*
- CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;*
- CE3 There are clear mechanisms for implementation and monitoring; and*
- CE4 It is reasonably flexible to enable it to deal with changing circumstances.*

Belfast City LDP 2035

We are pleased to read on para 1.2.3, page 4 of the DPS that Belfast City understand the role of the Local Development Plan in facilitating growth by coordinating public and private investment to encourage development where it can be of most benefit to the wellbeing of the community. The subject lands present such a development opportunity where real benefit to the wellbeing of the community could be achieved by providing affordable housing in an area identified by the NIHE as having a great need.

Strategic Aims

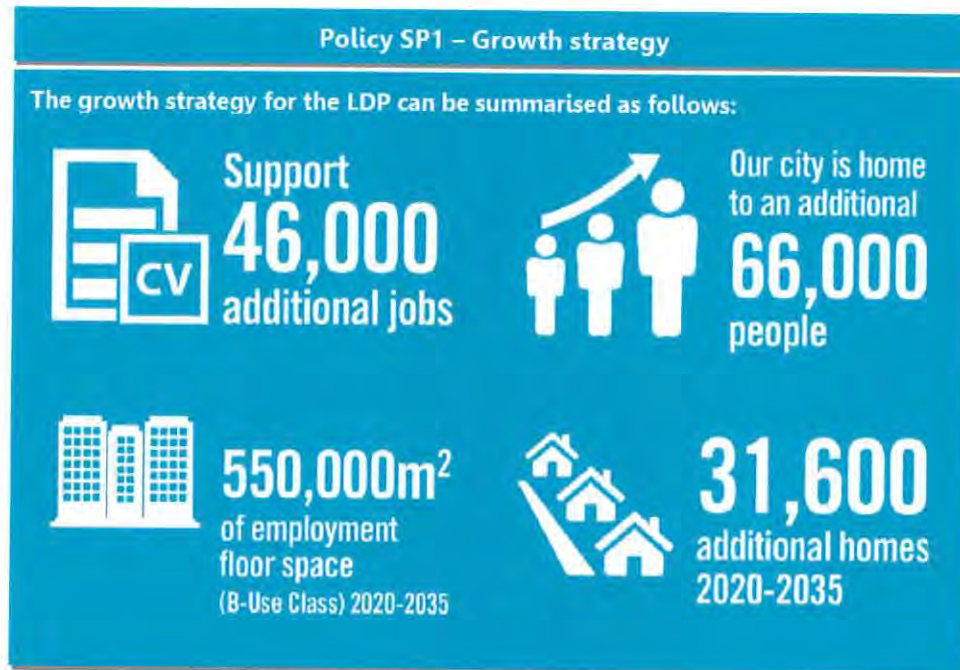
On p25, the Draft Plan Strategy sets out four strategic aims to help realise the vision for the city in 2035:

- Shaping a Liveable Place
- Building a smart connected and resilient place
- Creating a vibrant economy
- Promoting a green and active place

We **support** these aims.

Starting at page 34 the Draft Plan Strategy sets out eight strategic policies for the Local Development Plan. Comments are provided below in respect of SP1.

Policy SP1 - Growth Strategy



Belfast City Council propose ambitious economic growth plans, which seek to add a further 46,000 jobs to the economy over the period 2020-2035 in line with the city's objective to enable it to compete with similar cities elsewhere in the UK in terms of attracting investment, creating jobs and driving the regional economy (Policy SP1, Belfast City Council Draft Plan Strategy, January 2017, p34-35). This proposed economic growth therefore influences the growth of the population and in turn the level of residential development required to support this growth. Belfast City Council therefore proposes to grow the population by 66,000 which in turn will require the development of an additional 31,600 homes over the plan period 2020 - 2035.

We are generally supportive with Belfast City Councils Policy SP1 Growth Strategy for supporting economic growth as enhancing Belfast's economic prosperity will raise the growth of the region as a whole, ultimately encouraging more individuals to work and live within the city, strengthening the role of the Belfast as the regional capital of Northern Ireland. However, we are disappointed to see the target number for additional homes required within the Council area being downsized from 37,000, as set out in the Preferred Options Paper, to 31,600 as set out within the Draft Plan Strategy. The 31,600 additional homes target for the 15 years of the plan period does not provide a 5 year over supply to ensure there is no shortfall in the supply of housing over the plan period. The original housing growth figure of 37,000 is therefore a much more robust figure for housing growth across the district and would allow for unexpected growth during the plan period. Therefore, we would encourage the council to revert back to their original figure of 37, 000 additional homes for the district by 2035 as set out in the Preferred Options Paper.

Soundness Test

- The Growth Strategy (Policy SP1) is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test C4). The reduction in the projected housing growth, from 37,000 to 31,660, limits the flexibility of this policy's ability to deal with unexpected growth.

Remedy

- Return to original projected housing figure (37,000) from the Preferred Options Paper.

Policy SD 1 - Settlement Hierarchy

Policy SD1 – Settlement hierarchy		
The Belfast district consists of four settlements.		
Classification	Role and function	Settlement
Principal City	The regional centre for administration, specialised high order services and cultural amenities. It is the regional gateway with links to other European cities, and provides the largest transport hub for NI.	Belfast City
Small Settlements	Distinct rural settlements in the countryside. They provide a focal point for the rural community, and have a number of local community facilities and services.	Edenderry Hannahstown Loughview

On page 47, the Draft Plan Strategy sets out the spatial development strategy for the plan, including a proposed Settlement Hierarchy (Policy SD 1). The hierarchy proposes Belfast City as the Principle City with Edenderry, Hannahstown and Loughview identified as Small Settlements. We **support** this hierarchy of the settlements, with the majority of population and economic growth being directed to Belfast as the principle city. The proposed settlement hierarchy encourages sustainable development by reducing the need to travel with the population concentrated close to employment and key public transport corridors.

Policy HOU1 – Accommodating new homes

Policy HOU1 – Accommodating new homes

There is a requirement for 31,660 new homes in Belfast over the period 2020-2035. This will be delivered in accordance with the requirements set out in the following table.

Settlement / Area		Net additional dwellings (2020-2035)
Belfast city	Belfast city centre	8,000
	Belfast Harbour estate	3,500
	Rest of Belfast city	18,100
	<i>Belfast city Total</i>	<i>29,600</i>
Small Settlements	Edenderry	40
	Hannahstown	0
	Loughview	20
	<i>Small settlements total</i>	<i>60</i>
Windfall		2,000

The housing requirement will be delivered in accordance with the following indicative average annual rates:

- 2020/21–2024/25 – an average of 1,100-1,300 dwellings completed per annum
- 2025/26–2029/30 – an average of 2,100-2,300 dwellings completed per annum
- 2030/31–2034/35 – an average of 2,700-2,900 dwellings completed per annum

We would encourage the council to reconsider the provisions of this policy. At present there is a disproportionate lack of available sites zoned for housing in West Belfast where the greatest need for social housing has been identified by the NIHE (see table below). The table indicates that almost 50% of the social housing need for Belfast City 2016-21 is found within West Belfast.

Appendix 2 Social Housing Need by settlement 2016/21

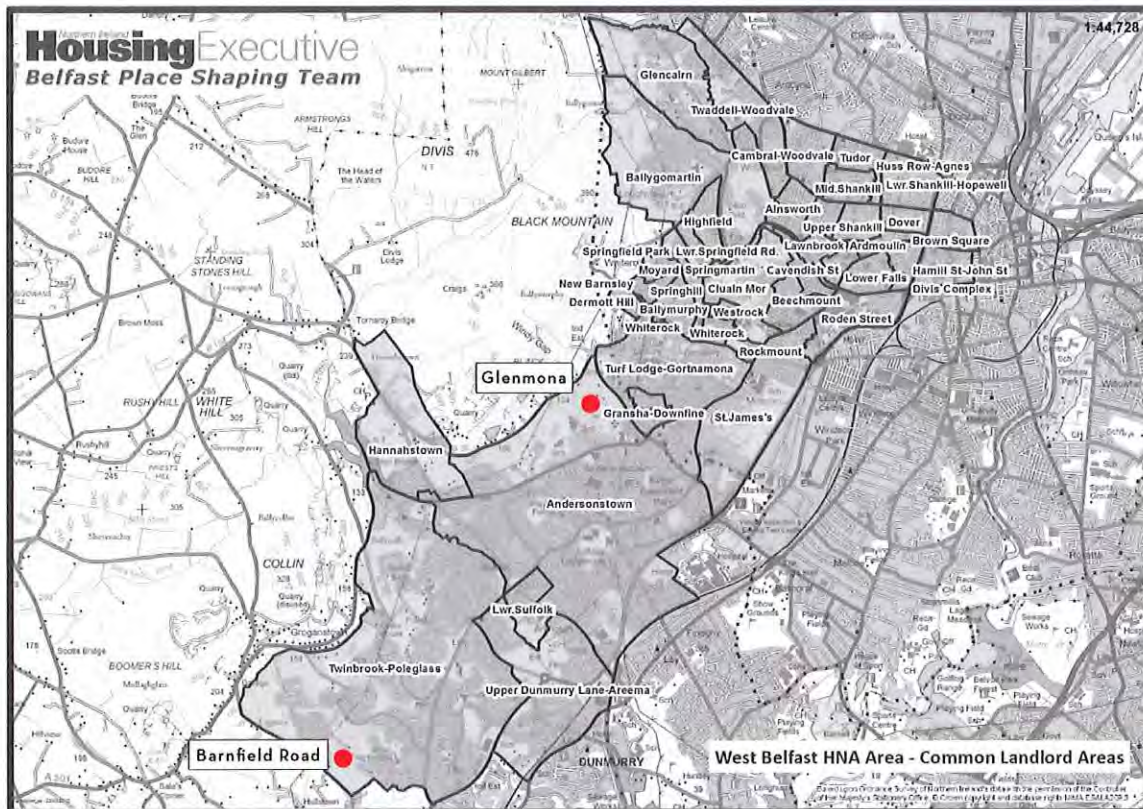
Settlement	Social Housing Need 2016-21
North Belfast Sector	1,400
South & East Belfast Sector	1,435
West Belfast	2,558
Belfast City Total	5,393

NIHE - Belfast Housing Investment Plan – Annual Update 2017 (p39)

In addition, we would argue that it may be difficult to achieve the majority of the allocation of new homes within Belfast City as a city centre location is unlikely to yield family sized homes, which are the most in demand housing types.

In para 7.1.9, page 61, the council allude to the potential that land may be phased to ensure the alignment of housing delivery with planned infrastructure investment and development lead-times. We would strongly object to the introduction of the phasing of housing land and firmly believe that the market is best placed to decide which sites are developed first.

The subject lands at Barnfield Road lie with the Twinbrook – Poleglass Common Landlord Area (CLA) and the subject lands at Glenmona fall within the Andersonstown CLA as defined by the Northern Ireland Housing Executive (see map below).



Both of these CLAs have been identified by NIHE as having the greatest need within West Belfast for social housing where demand largely outstrips supply. In Inner West, Middle West and Outer West, the number of applicants as of March 2018 in this area was 2,981 with only 455 units being allocated by the NIHE for that year end.

Appendix 6: Applicants and Allocations by HNA areas at March 2018

	Applicants (Total)	Applicants (HS)	Allocations
Greater West/Shankill			
Inner West	972	785	182
Middle West	1,273	1,030	151
Outer West	736	618	122
Ainsworth/Woodvale	189	120	69
Ballygomartin	108	73	66
Lower Shankill	55	33	39
Mid-Shankill	166	98	61
North Belfast			
North Belfast 1	1,878	1,480	340
North Belfast 2	587	332	281
South & East Belfast			
Donegall Road	322	203	106
Finaghy	255	167	24
Lisburn Road/University	444	339	15
Lower Ormeau/Markets	367	286	27
Upper Ormeau	445	324	61
Inner East Belfast	780	509	265
Middle East Belfast	920	565	233
Outer East Belfast	567	316	133
Short Strand	72	58	20
Belfast City Totals	10,136	7,336	2,195

Applicants (Total) – Total housing applicants at March 2018 (i.e. those in housing stress and those not in housing stress)

Applicants (HS) – Housing stress applicants at March 2018 (i.e. 30 points or more)

Allocations – Annual allocations for year ending March 2018

NIHE - Belfast Housing Investment Plan – Annual Update 2018 (p58)

An FOI request made to NIHE in 2016 revealed that for the period 2012-2016 the average number of months that applicants within Twinbrook-Poleglass and Andersonstown CLA had remained on a waiting list at the point of allocation was 31.5 and 32.7 months respectively (see Appendix 5). This is in stark contrast to the Northern Ireland average which is 19 months. This further demonstrates that need in these two areas is not being met efficiently.

The tables below highlight the remaining housing zonings in the vicinity of the subject sites. All of these zonings are now built out, committed housing sites or there is no evidence of intention by the landowner to develop the site. There is clearly a lack of currently zoned land available within this part of the city and therefore a need to zone additional land suitable for family sized dwellings in order to meet the demand in this area for housing during the plan period.

Table 1 – Existing Housing Zonings (BMAP 2015) within the vicinity of the subject site at Barnfield Road

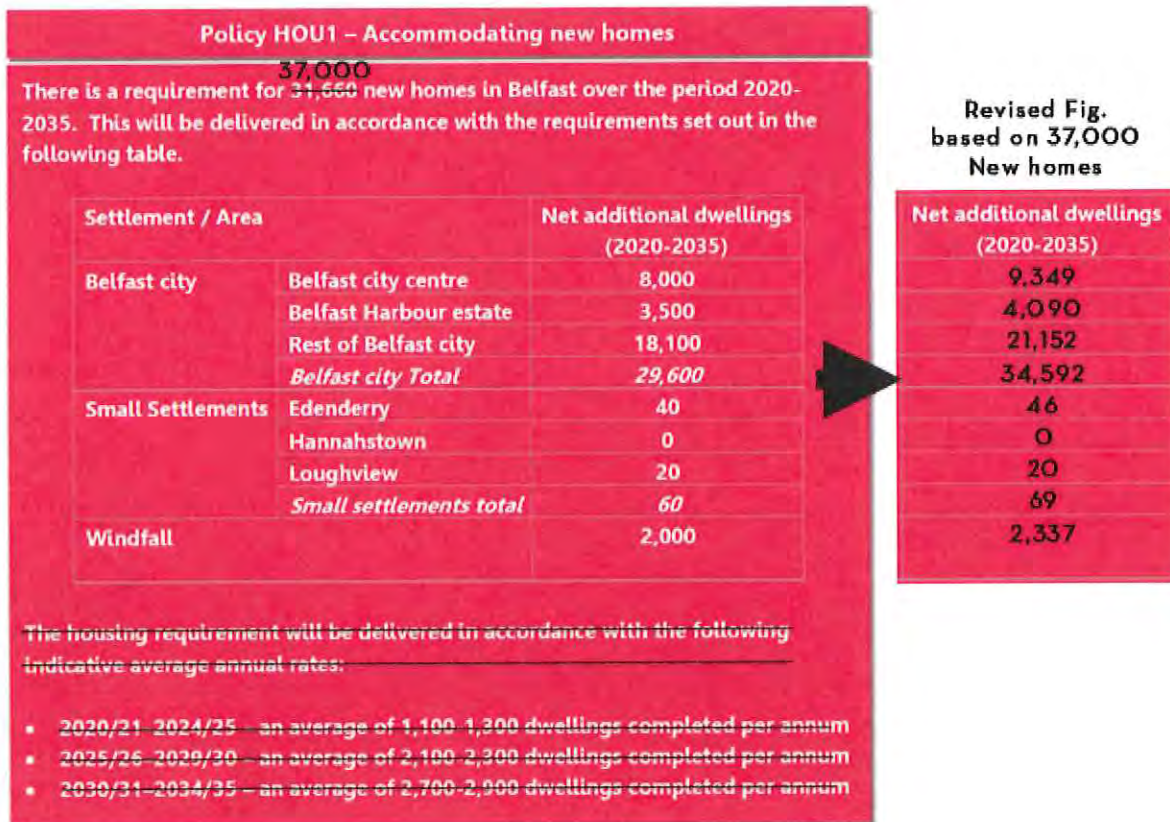
Ref	Site	Size	Status
ML 03/01	Lagmore Housing Development	64.23	In final phase of development with only c. 5 ha of the zoning remaining
ML 03/06	Land at Lagmore Road	1.82	S/2008/0607/RM – Committed site with works on-going

Table 2 – Existing Housing Zonings (BMAP 2015) within the vicinity of the subject site at Glenmona

Ref	Site	Size	Status
WB 04/08	Land between Suffolk Road and Colin River, adjacent to 4 Riverside Mews	0.28	No evidence of appetite to develop
WB 04/09	Land between Kennedy Way and Stockman’s Crescent	0.32	Committed site - Z/2013/1399/F
WB 04/10	Land to rear of 127- 133 Andersonstown Road	0.29	No evidence of appetite to develop
WB 04/11	Land between Glen Road, Glencolin Rise, Glencolin Grove, Meadowhill and Glen Road Heights	12.64	Approx 3 ha of site committed for housing under ref Z/2013/0930/F with site works underway.

In some cases, zoned sites may never be developed, as demonstrated by the tables above. A phased approach to development could prevent other, more suitable and viable sites from being developed.

The policy should also be updated to reflect the original target for new additional homes (37,000) as set out in the Preferred Options Paper. The 37,000 new homes target should be redistributed on a pro rata basis to the various settlements/areas (see below). The housing requirement rate element of the policy should be removed from the policy, as recent land uptake in this area coupled with the land of available zonings could actually mean higher demand with the first 5 years of the plan. These 5-yearly targets could still be kept to monitor the performance of the plan in delivering housing but it should be removed from the policy itself.



Soundness Test

- This policy is contrary to soundness test CE4 in that it is not flexible. The proposed housing allocation figure of 31,660 in the DPS does not include a 5 year over supply of housing and is therefore not flexible and able to respond to unexpected growth during the plan period.
- In addition, the policy sets out what the delivery of housing will be on a 5-yearly basis, with delivery increasing towards the end of the plan period. This is also an inflexible approach. Especially, in the event, as stated previously, of the council area experiencing a higher than anticipated level of growth in the first 5 years of the plan.

Remedy

- The council should revert back to the housing growth figure of 37,000 as set out in the Preferred Options Paper.
- The council should remove the section of the policy which stipulates average annual figures for the delivery the housing requirement.

Policy HOU4 – Density

Policy HOU4 – Density of residential development		
Planning permission will be granted for residential development proposals which are brought forward in accordance with the following density bands:		
Settlement / character area	Average density band (dwellings per hectare)	Locational criteria
Tall buildings within city centre	> 350	Locations to be identified
Belfast city Centre	150-350	Within the defined city centre boundary
Inner city Belfast	75-150	As defined within the settlement strategy
Outer Belfast	25-125	Remainder of Belfast city between inner city Belfast and the settlement development limit
District centres	100-200	Within 200m of a district centre
Local centres	75-150	Within 100m of a local centre
City corridor	100 -175 within inner city	50m either side of a designated city corridor
Rail stations and halts	50-150 within outer Belfast	Within 100m of a rail station or halt
Small settlements	25-50	Within the settlement development limits of the small settlements
The above density bands are to be used as a guide to inform proposed developments within the relevant settlement areas and development proposals outside of these broad bands will be considered on their merits. This will be subject to meeting all other policy requirements.		

We **support** this policy and commend the council on proposing a policy that provides flexibility in terms of the range of housing densities that would be acceptable across the district.

Policy HOU5 – Affordable Housing

Policy HOU5 – Affordable housing
<p>Planning permission will be granted for residential development on sites greater than 0.1 hectares and/or containing 5 or more dwelling units where a minimum of 20% of units are provided as affordable housing.</p> <p>Affordable housing should consist of social rented housing and/or intermediate housing. In determining the appropriate mix of affordable housing in terms of size, type and tenure, regard will be had to an up to date analysis of demand, including housing stress and prevailing housing need.</p> <p>The affordable housing should be provided as an integral part of mixed tenure development, integrated with general needs housing and not readily distinguishable in terms of external design, materials and finishes.</p> <p>Where it can be demonstrated that it is not sustainable or viable for a proposed development to meet the requirements of this policy in full, the council will consider suitable alternatives on a case-by-case basis.</p> <p>Affordable housing will be secured by way of section 76 planning agreement, which should be in place in advance of planning permission being granted.</p> <p>Any proposal for housing that is considered to be artificially dividing a larger site to circumvent the affordable housing requirement will not be permitted. Where a concept masterplan is provided to demonstrate the comprehensive planning of such a site and how the full affordable housing obligations will be met, partial development may be permitted if the affordable housing element can be secured by way of s76 planning agreement. This will also allow for the phased development of larger sites.</p>

We **do not support** this policy in its present form.

We consider that the thresholds of a 0.1ha site size and 5 no. units are set too low and that the site size and unit numbers where the affordable housing provision is applicable should be increased. In addition, the expectation that a minimum of 20% of units should be provided as affordable housing is excessive. On page 69, para 7.1.26, the council states that “where it can be demonstrated that it is necessary and viable to provide a higher proportion of affordable housing, the council will expect developments to do so”. This statement undermines the above set thresholds. If this policy is to be retained, the opposite should also apply, i.e. where no need exists then the council should not expect any affordable housing provision within a scheme.

Though the policy has been designed with the aim of delivering affordable housing through the planning process, it will actually only serve to inflate the overall price of the remaining market housing within schemes. Developers will be forced to pass the burden of providing affordable housing within a scheme onto the purchasers of the remaining market housing through increased house prices, to ensure that a scheme remains viable. This, in turn, will also have implications for land values, causing price inflation and this will be to the detriment of the housing market.

This policy, if taken forward, could see developers reducing residential development in general, resulting in fewer housing projects being brought forward and result in affordable housing not being delivered in the volume that was anticipated. This non-delivery of housing development could undermine LDP targets.

The policy will not necessarily deliver affordable housing in the locations where those in need of affordable housing would wish to live. Those seeking affordable housing will often wish to remain within the close knit community where they have grown up and where family ties are strong. The policy in its current form would seek to provide affordable housing on a blanket basis, whether needed or not, spread across the district. There is therefore a need for a more targeted approach, based on NIHE areas of demand. For example, within West Belfast, the Common Landlord Areas (CLA) with the greatest need for social housing is Twinbrook-Poleglass and Andersonstown, as demonstrated in our response to Policy HOU 1. A targeted approach based on need would direct affordable housing towards sites, such as the subject lands, that lie within the Twinbrook-Poleglass and the Andersonstown CLAs.

The policy does not explicitly state that the affordable housing requirement could be delivered off-site as an alternative to providing it on-site and such an approach would create more certainty regarding delivery and alternatives. Another approach could be the payment, by developers, of a fixed commuted sum, that is used to fund affordable housing provision within the district. Either of these approaches would ensure that affordable housing is provided within the district but on a more flexible basis that would allow the council to better respond to ever-changing need.

The policy does not differentiate between site types: greenfield, brownfield, inner city and edge of city sites. The land values associated with these site types vary and has implications for development costs of projects. Therefore, the policy could differentiate between site types by using a banding system such as that used by the City of York or Leeds (see page 13 & 14) where the level of provision required is based on zones.

In addition, consideration should be given to discounting the amount of social housing provision required for residential schemes that utilises vacant/derelict buildings such as old mills and other buildings of architectural merit. This can be justified as the development costs of these types of schemes tend to be higher than new build projects on a 'shovel ready' site and not only would discounting the affordable housing requirement on such sites ease the burden on developers, it would also encourage sustainable development and regeneration of existing buildings across the district.

We would suggest that it would be cumbersome and time-consuming to put in place Section 76 planning agreements in order to secure an affordable housing element within a residential scheme. This would ultimately delay the delivery of the schemes as planning permission would be withheld until the legal agreement was in place and a developer would not be able to commence works until such times as the consent has been issued. Therefore, we would urge the council to remove any reference to the need for section 76 planning agreements. It would be more appropriate and efficient to deal with these matters through an appropriately worded planning condition.

We would respectfully suggest that Policy HOU 5 is revised to read as follows:

“Planning permission will be granted for residential development that provides affordable housing, where it can be demonstrated that there is need.”

Affordable housing should consist of social rented housing and/or intermediate housing. In determining the appropriate mix of affordable housing in terms of size, type and tenure, regard will be had to an up to date analysis of demand, including housing stress and prevailing housing need.

The affordable housing should be provided as an integral part of mixed tenure development, integrated with general needs housing and not readily distinguishable in terms of external design, materials and finishes.

Where it can be demonstrated that it is not sustainable or viable for a proposed development to meet the requirements of this policy in full, the council will consider suitable alternatives on a case-by-case basis, such as commuted sums.”

Examples of Affordable Housing Planning Policy in other UK cities – York, Leeds and Manchester

City of York

On page 115 of City of York's Local Plan Draft Publication, Policy H10 – Affordable Housing is proposed as a planning policy to ensure appropriate provision of affordable housing in new residential schemes. The plan was been submitted to the Secretary of State for Housing, Communities and Local Government on Friday 25 May 2018 for independent examination.

The policy directs a differing level of provision based on the site type and units numbers as set out below:

Table 5.4: Affordable Housing Site Thresholds

Threshold	Target
Brownfield sites = > 15 dwellings	20%
Greenfield sites = > 15 dwellings	30%
Urban, Suburban and Rural sites 11-14 dwellings	20% ¹
Urban brownfield sites 5-10 dwellings ²	15% ¹
Urban greenfield sites 5-10 dwellings ²	19% ¹
Urban brownfield sites 2-4 dwellings ²	6% ¹
Urban greenfield sites 2-4 dwellings ²	10% ¹
Sub-urban brownfield sites 5-10 dwellings ²	10% ¹
Sub-urban greenfield sites 5-10 dwellings ²	15% ¹
Sub-urban brownfield sites 2-4 dwellings ²	2% ¹
Sub-urban greenfield sites 2-4 dwellings ²	7% ¹
Rural brownfield sites 5-10 dwellings ²	11% ¹
Rural brownfield sites 2-4 dwellings ² that	3% ¹
Rural greenfield sites 5-10 dwellings ²	17% ¹
Rural greenfield sites 2-4 dwellings ²	8% ¹
Notes to Table	
1	This is the target percentage to be used in the off-site financial contribution calculation following sub-clause (iii) below
2	For sites that have a maximum combined gross floorspace of more than 1,000sqm

Belfast City Council could introduce a similar banding that differentiates between the each site type where new housing is proposed.

Leeds Council

On page 79 of Leeds Core Strategy, Policy H5 sets out the council’s planning policy in relation to affordable housing (below). The policy sets targets and thresholds for affordable housing provision based on a number of broad zones across the council area. Belfast City Council could incorporate elements of this policy, which responds to and is reflective of the variation of land value based on geography of sites within the district.

POLICY H5: AFFORDABLE HOUSING

The Council will seek affordable housing either on-site, off-site or financial contributions from all developments of new dwellings. Housing developments above a certain threshold should include a proportion of affordable housing to be normally provided on the development site.

On-site provision

On site affordable housing will normally be expected at the targets specified for developments at or above the dwelling thresholds in the following zones:

Zone	Target	Threshold
1	35%	10
2	15%	15
3	5%	15
4	5%	15

Off-site provision for smaller schemes

For housing schemes below the on-site size thresholds in Zones 1 and 2, an offsite commuted sum will be sought tapered down proportionately from the equivalent cost of on-site provision at the lowest size threshold.

Affordability of affordable housing should be designed to meet the identified needs of households as follows;

- 40% affordable housing for households on lower quartile earnings
- 60% affordable housing for households on lower decile earnings

The affordable units should be a pro-rata mix in terms of sizes and types of the total housing provision, unless there are specific needs which indicate otherwise, and they should be suitably integrated throughout a development site.

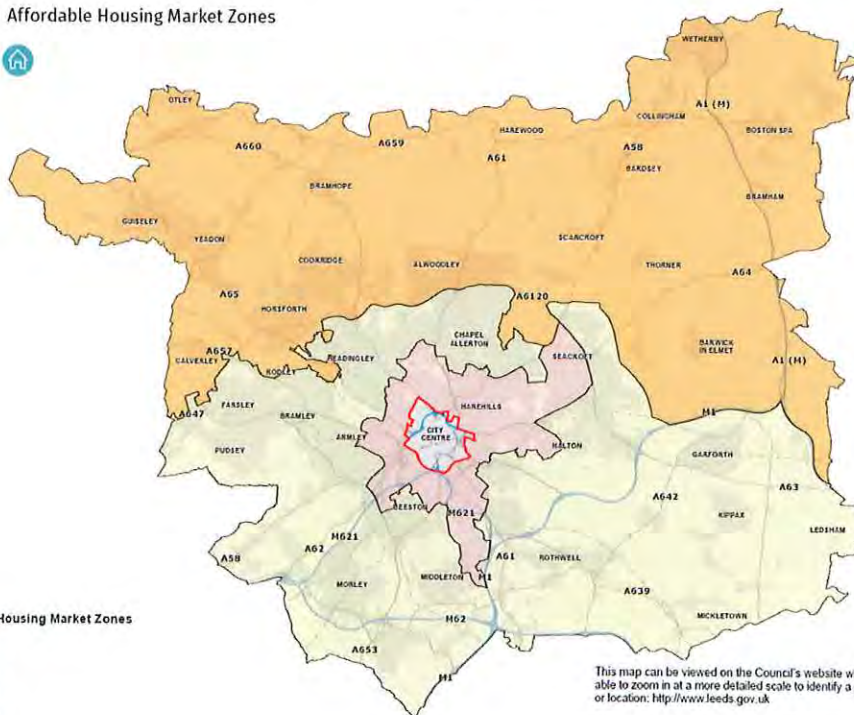
Applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met. In such cases, affordable housing provision may be reduced accordingly.

Affordable housing provision should be on site, unless off site provision or a financial contribution can be robustly justified.

Elderly persons sheltered housing and low cost market housing should not expect the requirement for affordable housing to be automatically waived or reduced, although individual viability appraisals will be taken into account.

Secure arrangements in the form of S106 agreements, must be agreed to ensure delivery and that affordability embodied within affordable housing is maintained for future people of Leeds in housing need.

Map 12 Affordable Housing Market Zones



Key
Affordable Housing Market Zones
ZONE
 Zone 1
 Zone 2
 Zone 3
 Zone 4

This map can be viewed on the Council’s website where you will be able to zoom in at a more detailed scale to identify a particular site or location: <http://www.leeds.gov.uk>

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Manchester City Council

In Manchester's Core Strategy, p116, Policy H8 relates to Affordable Housing.

Within this policy, the threshold is set at sites of 0.3ha or greater or where a scheme proposes 15 units or greater that affordable housing provision (20%) will be expected.

It also states that an exemption from providing affordable housing or a lower proportion may be acceptable in some circumstances, such as where it would financially undermine significant development proposals critical to economic growth within the City.

This threshold in terms of unit numbers and site size is much less onerous and stringent than that proposed in Belfast City Council's Draft Plan Strategy. We would encourage the council to review and relax the thresholds for the requirement to provide affordable housing within new residential developments.

Soundness Test

- The policy is contrary to soundness test CE2 as it is not realistic or appropriate to require 20% for Affordable Housing on sites of 0.1ha or 5 no. units or more.
- It is also contrary to soundness test CE3 in that there is no suitable mechanism for implementation i.e. Section 76 Agreements are not suitable means to deliver the affordable housing provision within a scheme.
- Finally, the policy is contrary to soundness test CE4 in that it is not flexible and lacks alternatives such as the payment of a fixed commuted sum by developers.

Remedy

- The policy should be re-worded so that affordable housing provision is linked to demand/need. It should also be updated to allow for alternatives such as the payment of a fixed commuted sum by developers.

Policy LC1 – Landscape

LC1 – Landscape

New development should seek to protect and, where appropriate, restore or improve the quality and amenity of the landscape. In assessing development proposals in any designated landscape, the council will give careful consideration to the following:

- a. The protection and enhancement of the landscape and visual character of the area;
- b. The protection of built (architectural and archaeological), natural and cultural features, their views and settings;
- c. The sensitivity of the landscape and its capacity to accommodate development (including cumulatively) without adversely impacting on landscape character and visual amenity; and
- d. Mitigation measures, including the retention and protection of existing trees and other vegetation and planting of new trees and vegetation.

The council will require appropriate landscape analysis and/or visual assessments, in areas designated for landscape importance, for consideration prior to planning applications being determined. The council may also require landscape analysis and/or visual assessments for other areas.

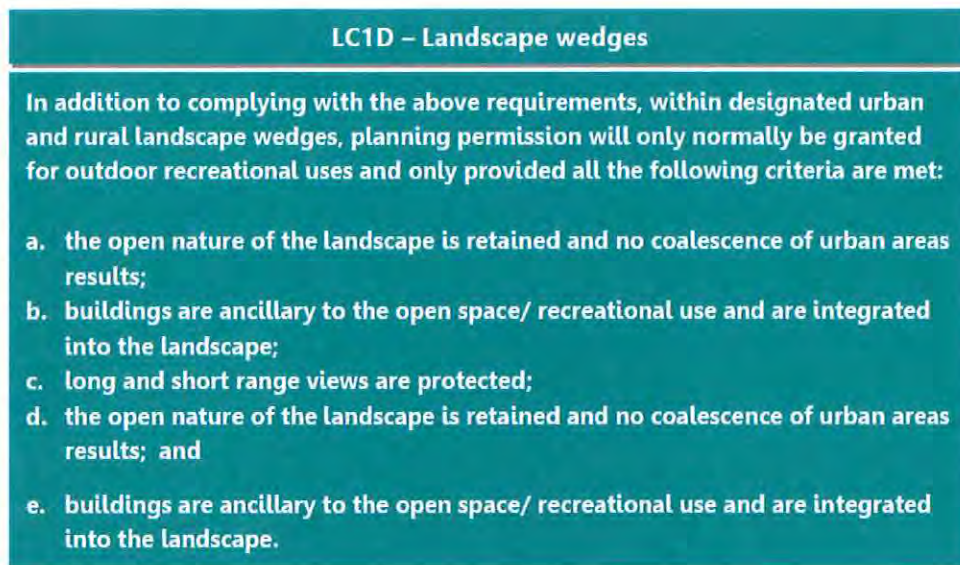
Planning permission for new development within areas designated for landscape importance will only be granted where it is of an appropriate design and scale for the locality and all the following criteria are met:

- e. The siting of the proposal is sympathetic to the special character of the area;
- f. It respects or conserves built heritage features of importance to the character and appearance of the landscape;
- g. There is no adverse impact on natural heritage and biodiversity; and
- h. The proposal respects:
 1. Local architectural styles and patterns;
 2. Traditional boundary details, by retaining features such as hedges, walls, trees and gates; and
 3. Local materials, design and colour.

Where potential adverse impacts cannot be avoided, and subject to the level of protection offered by any designation, suitable mitigation measures must be provided. In such exceptional circumstances, the development may be considered where it is clearly shown that it will bring substantial community or other benefits that outweigh any potential landscape impacts and that adequate mitigation will be put in place. Any agreed mitigation measures, including management or improvement works on-site or off-site, may be carried out by the developer or a financial contribution from the developer may be sought in lieu of such measures for other appropriate measures.

We **support** this policy. The policy strikes the right balance between protecting and enhancing the natural environment, whilst still allowing for development where it is of an appropriate design and scale for the locality.

Policy LC1D – Landscape Wedges



We **do not support** this policy in it's current form. We would suggest that the policy is too restrictive in terms of the types of developments which would be permitted within a rural landscape wedge. In the case of the Barnfield Road site which lies at the edge of a settlement limit and within Rural Landscape Wedge LN 02, the policy would not allow for the delivery of social housing in an area where there is significant demand and limited land available within the settlement limit to meet this need. We agree with criteria a and c but would suggest that criteria b, d & e are removed from the policy. If a proposal complies with criteria a and c then it ought to be granted planning permission, providing it is an appropriate development type, it is compatible with other surrounding land uses and it satisfies all other prevailing planning policy.

We would therefore suggest that the policy wording is revised to the following:

*"In addition to complying with the above requirements, within designated urban and rural landscape wedges, planning permission will only be granted for **appropriate development** where it lies directly into the existing built form and only provided all the following criteria are met:*

a. the open nature of the landscape is retained and no coalescence of urban areas results;

b. long and short range views are protected;"

Soundness Test

- The policy is contrary to soundness test CE4 in that it is not flexible and would not permit appropriate development that lies into the existing urban form such as social housing

provision where there is extreme need and there is a limited supply of land within the settlement limit to meet that need.

Remedy

- The policy should be re-worded, as set out above, so that it permits appropriate development that lies into the existing urban form. Criteria b, d and e should be removed from the policy and criteria 'a' and 'c' should remain as the key policy tests.

Policy HC1 – Promoting Healthy Communities

Policy HC1 – Promoting healthy communities

The council will seek to ensure that all new developments maximise opportunities to promote healthy and active lifestyles. New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles. This will include supporting active travel options, improving accessibility to local service centres, reducing the use of private car travel, adequate provision of public open space, leisure and recreation facilities, high quality design and promoting balanced communities and sustainable neighbourhoods.

Planning permission will be granted for proposals that help to sustain and improve neighbourhoods in all parts of the city.

Health and wellbeing is an important consideration during the development management process and significant development proposals will require to demonstrate how they contribute towards promoting healthy communities. The council will require the submission of a HIA¹⁴ as part of major residential, commercial and industrial developments or other proposals with potential to have a significant adverse effect on public health and wellbeing.

The council may seek to secure health and wellbeing improvement measures by way of s76 planning agreement. This may be by way of agreed works carried out by the developer or a financial contribution from the developer in lieu of such provision.

We **support** this policy. Planning has the potential to promote healthy and active lifestyles by providing policy which encourages and supports new developments that incorporate active travel options and reduce the reliance on the private car. This policy is permissive of proposals that help to sustain and improve neighbourhoods and is therefore particularly relevant in the case of the subject lands where the development of the site would satisfy a need for housing within the west of the city.

We would however suggest that it would be cumbersome and time-consuming to seek Section 76 planning agreements in order to secure health and well-being improvements linked to developments. This would ultimately delay the delivery of the schemes as planning permission would be withheld until the legal agreement was in place and a developer would not be able to commence works until such times as consent has been granted. Therefore, we would urge the

council to remove the final paragraph of this policy removing the need for section 76 planning agreements and instead deal with this issue via an appropriately worded planning condition.

Policy CI1 – Community Infrastructure

Policy CI1 – Community infrastructure

The council will seek to protect and provide development opportunities for community, health, leisure, nurseries and educational facilities based on local need in line with the projected population growth over the plan period.

Planning permission will be granted for the provision of new and improved community infrastructure at appropriate and accessible locations within the urban area, subject to consideration of the nature and location of any proposals. All proposals shall ensure that there is no unacceptable impact on residential amenity or natural/built heritage and satisfactory arrangements are provided for access for all, including for pedestrians, cyclists and public transport. Where proposals affect lands specifically zoned for development for particular uses, such proposals will only be considered where they do not prejudice the proper planning and sustainable development of the zoned lands.

In exceptional circumstances where there is no suitable land available in a designated village settlement boundary, favourable consideration may be given to a community use associated with the settlement which is located next to the settlement limits.

There is a presumption against the development of existing community infrastructure or lands identified for such use for alternative uses. Proposals for alternative uses will require to demonstrate that the existing facility/designated site is no longer required and that alternative arrangements are in place to ensure no significant diminution of community infrastructure provision.

Where appropriate, new developments should be required to provide or contribute towards any new community infrastructure requirements arising as a result of development and should ensure good accessibility to existing services and facilities intended to serve future residents. The council may seek to secure the provision or improvement of community facilities, or improved access to such facilities, by way of s76 planning agreement. This may be by way of agreed works carried out by the developer or a financial contribution from the developer in lieu of such works.

We are **supportive** of this policy. The policy contributes to the council's aim of improving the health and well-being of the citizens living within the city by ensuring that adequate provision is made for community infrastructure facilities placed at highly accessible locations. The subject lands are such locations.

As previously stated in relation to Policy HOU5 & Policy HC1, we do not believe that Section 76 Agreements are suitable in this instance and that appropriately worded planning conditions would

be a much more efficient method of securing the associated benefits of a scheme. Therefore, we would urge the council to remove this element of the policy.

Proposed Site for Inclusion within the Settlement Limits of Belfast

Based on the ambitious economic and associated housing growth plans in the DPS and considering the lack of sufficient previously developed and undeveloped land within the existing settlement limit in Belfast; we would urge the Council to consider the expansion of the settlement limits in appropriate and sustainable locations to accommodate new residential development that is required to meet the projected housing need. In addition, we would also suggest that the council give consideration to rezoning some sites for residential development where there is significant need.

On this basis, we draw your attention to our client Braidwater Ltds. lands located at Barnfield Road and Glenmona, Belfast (see Appendix 1 & 2).

Barnfield Road

These lands are particularly well suited to accommodate expansion of the current settlement limit in line with its increased housing growth for the following reasons:

- The subject land is a logical extension of the existing development limit, as it does not impact on the landscape setting of the city.
- The lands directly abut the existing settlement limit.
- There is significant need for social housing within the Twinbrook-Poleglass Common Landlord Area – the subject lands lie within this CLA and if zoned for housing could contribute towards meeting this need.
- The site is well-located, as it lies into the zoned existing residential areas of ML 03/01 (see Appendix 3).
- The site could be accessed by creating a link through the existing residential development at Lagmore View.
- Existing mature vegetation along the southern boundary of the lands will assist with integration of any future development into the landscape helping to contain views from the surrounding road network.
- Whilst the lands lie with a rural landscape wedge (LN 02) as defined by BMAP 2015, developing the subject lands would not impact upon the function of this designation as the remaining lands would still provide an adequate visual break and prevent the coalescence of Lagmore and Milltown.

Glenmona

These lands are suitable for being rezoned for residential use to help meet the need for social housing with the Andersonstown Common Landlord Area as:

- The subject lands lie within the existing development limit and if developed would not impact on the landscape setting of the city.
- The subject lands are currently zoned for mixed use development (BT 002), which includes residential (see appendix 4). A mixed use scheme was previously granted outline approval under ref Z/2010/0284/O thus further demonstrating the sites suitability for development/housing.
- There is significant need for social housing within the Andersonstown Common Landlord Area – the subject lands lie within this CLA and if rezoned for social housing could contribute towards meeting this need.
- The site is well-located, as it lies into existing residential areas to the south/south-east and thus the surrounding land uses would be compatible with residential development.
- The site is well served by public transport with bus stops within a short walking distance along the Glen Road and the Monagh By-Pass.
- The lands are highly accessible with existing access onto the Glen Road which links to the Monagh By-Pass a short distance away.
- There are no environmental constraints that would impacted by the development of the site.

It is clear from the points set out above that both land holdings are appropriately located to accommodate the projected housing growth for the district. We would therefore respectfully request that they are considered as housing zonings during the forthcoming stages of Local Development Plan preparation.

We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as the LDP progresses.

Yours Sincerely *Stuart*


Stuart Clarke

Gravis Planning

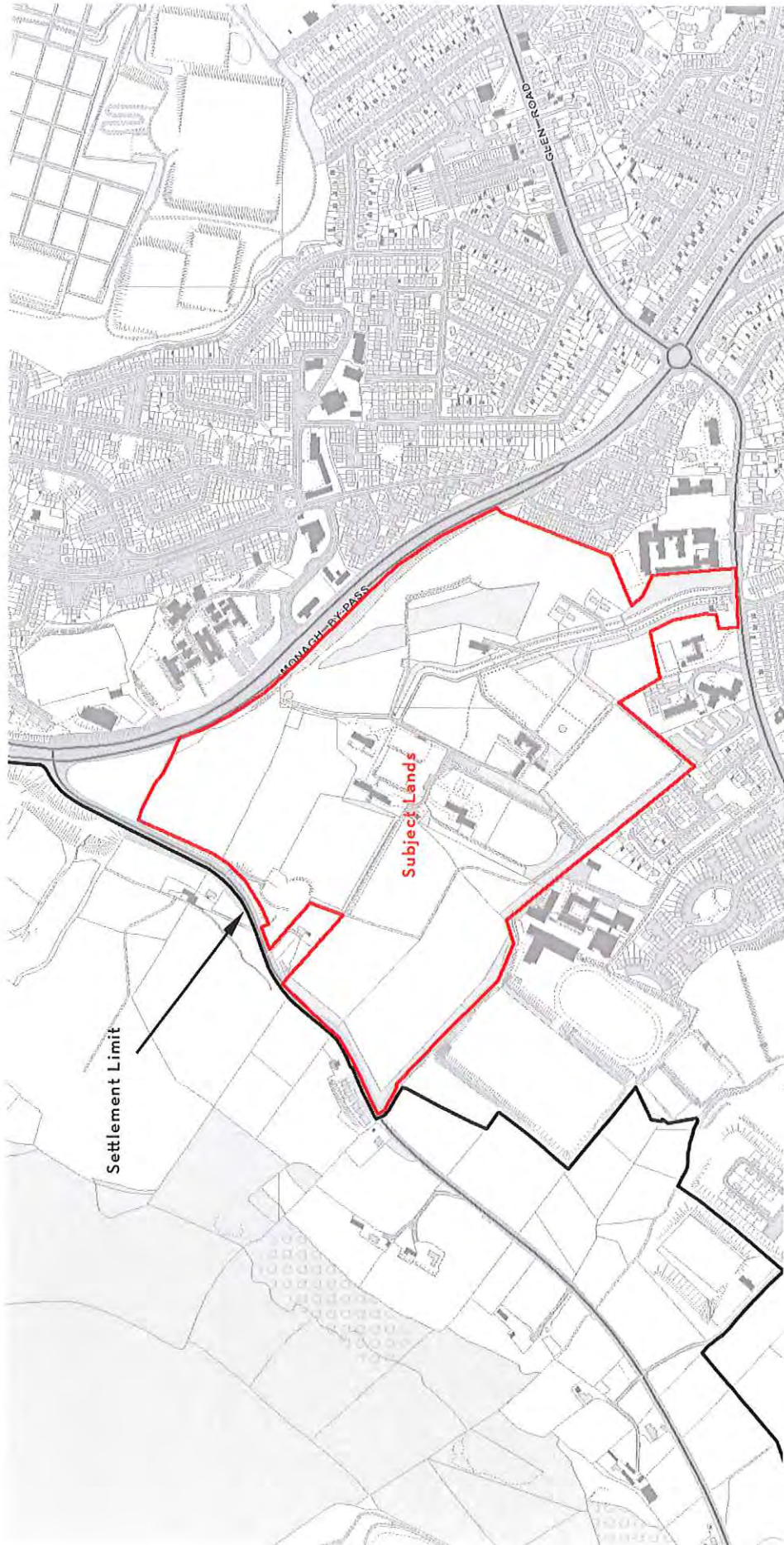
Appendix 1

Subject Lands at Barnfield Road



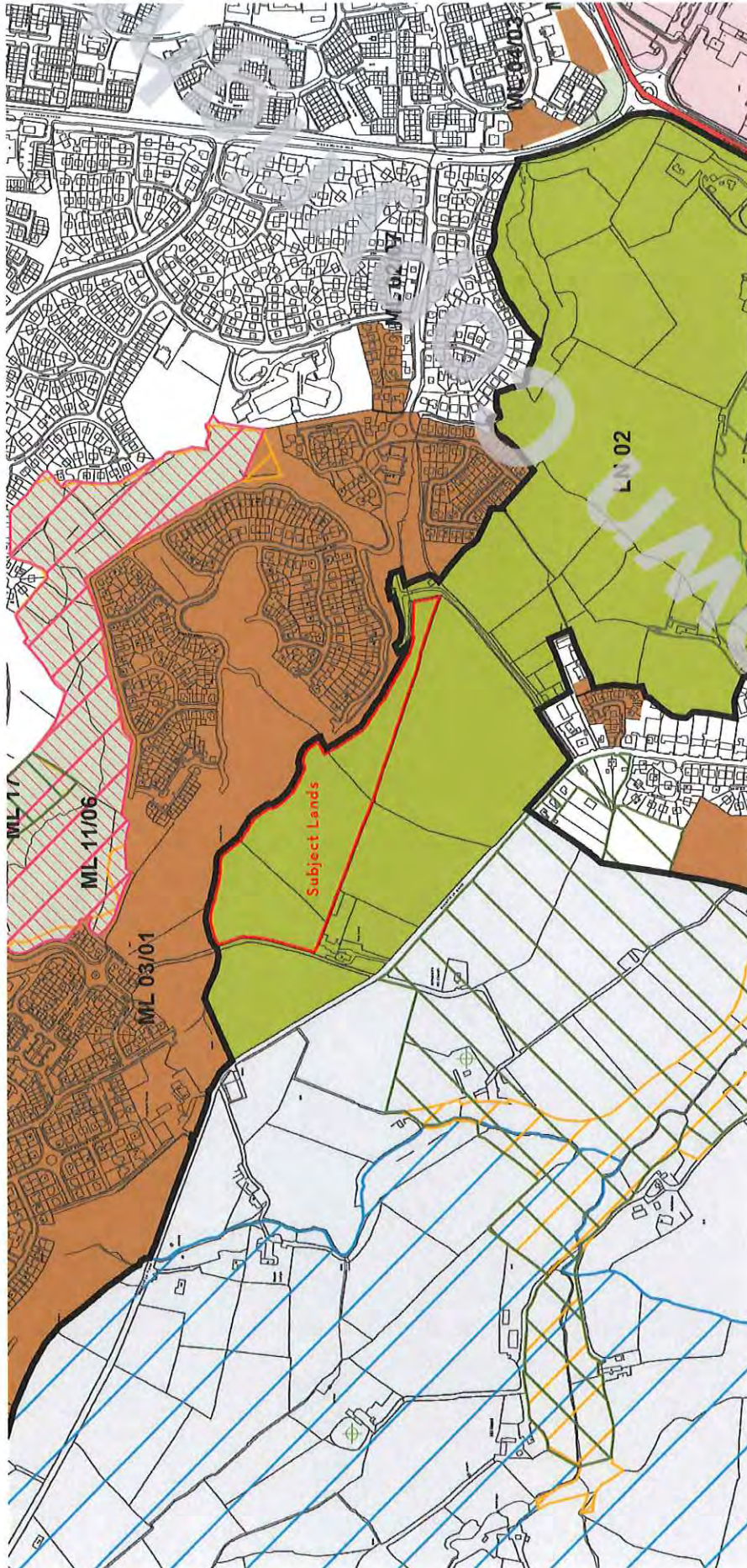
Appendix 2

Subject Lands at Glenmona



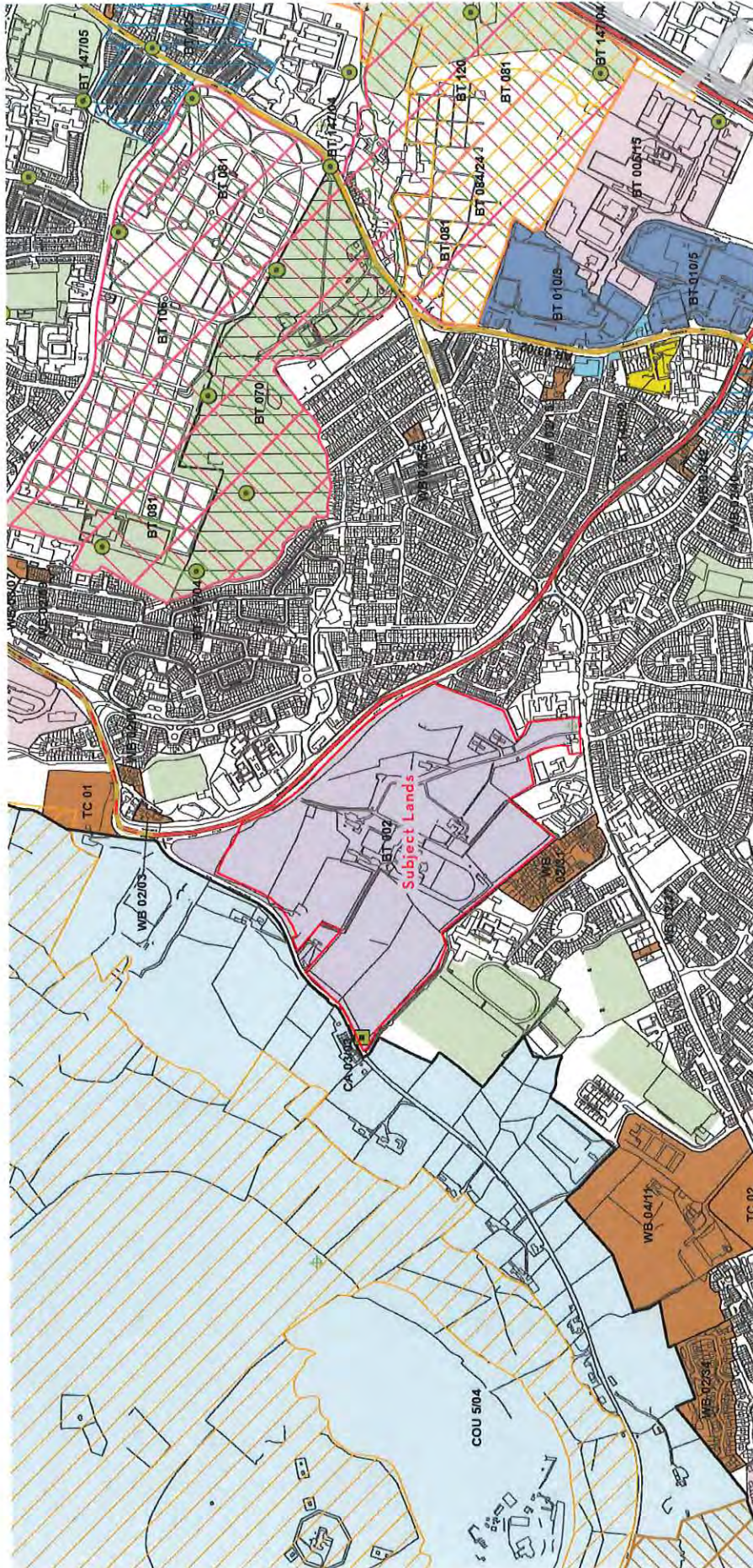
Appendix 3

Barnfield Lands relative to edge of settlement limit and existing housing zoning ML 03/01 - BMAP 2015



Appendix 4

Glennona Lands within the context of BMAP 2015



Appendix 5

FOI Request to NIHE - 23 Sept 2016

20160927 CPNEQY

FOI Common Landlord Areas CLAs in Belfast by

Mean Median Average Months on the Waiting List

Tony Crooks Fol Request:

I would like to request the following information for the dates of 2016 if possible.

- A breakdown by common landlord areas of the current average waiting list times and points (average) required in Belfast before being offered housing.
- A breakdown by common landlord areas of the current average waiting list times and points (average) required in Warrenpoint/ Waterfoot /Cushendall also in areas of Lisburn of Twinbrook /Poleglass and Lagmore before being offered housing.

Common Landlord Areas (CLAs) in Belfast by Mean & Median Average Months on the Waiting List and Mean & Median Average Points at the Point of Allocation from 1st April 2012 – 31st March 2016

NIHE Local Office	Common Landlord Area (CLA)	Number of Allocations	Mean Average Months on the Waiting List at the Point of Allocation	Median Average Months on the Waiting List at the Point of Allocation	Mean Average Points at the Point of Allocation	Median Average Points at the Point of Allocation
North Belfast	Alliance	17	19.2	11.0	115.5	108.0
	Ardoyne	282	23.9	18.0	141.9	140.0
	Ballysillan	106	9.9	6.5	109.1	102.0
	Carlisle/New Lodge	188	21.3	16.5	143.4	134.0
	Carrick Hill/Unity Flats	37	36.6	23.0	141.8	134.0
	Cavehill	112	21.2	13.0	155.5	144.0
	Cliffondene	13	22.8	16.0	159.8	144.0
	Cliftonville	299	22.0	16.0	143.9	140.0
	Duncairn Gardens	14	22.3	19.0	127.6	132.0
	Fairhill	24	15.1	11.5	161.5	140.0
	Gainsborough	136	17.0	8.0	89.5	95.0
	Glandore & Dunmore	<10	19.0	19.0	100.0	100.0
	Grove Area	54	13.0	9.0	115.3	120.0

NIHE Local Office	Common Landlord Area (CLA)	Number of Allocations	Mean Average Months on the Waiting List at the Point of Allocation	Median Average Months on the Waiting List at the Point of Allocation	Mean Average Points at the Point of Allocation	Median Average Points at the Point of Allocation
	Lower Ligoniel/Glenbank	75	17.4	9.0	85.4	90.0
	Lower Oldpark	139	12.2	8.0	78.6	80.0
	M/S Flats - Carlisle	124	20.6	13.0	128.5	120.0
	Mount Vernon Estate	29	16.9	10.0	75.6	80.0
	Newington/Limestone	60	20.5	15.5	148.5	139.0
	Oldpark	67	18.9	17.0	163.9	160.0
	Ross House Flats/Mountvernon Flats	97	9.4	5.0	43.6	30.0
	Shore Road	91	13.4	7.0	110.5	110.0
	Skegoneil/Ashfield/Fortwilliam	105	14.6	8.0	110.9	102.0
	Somerton Rd (Sheltered)	<10	43.5	52.5	198.3	177.0
	Sunningdale	42	15.4	8.0	97.1	99.0
	Torrrens	31	25.3	17.0	168.1	160.0
	Upper & Lower Duncairn	172	10.8	8.0	72.6	76.0
	Upper Ligoniel	94	24.0	18.5	149.2	144.0
	Westland	34	15.2	9.0	91.8	97.0
	Wheatfield	69	10.9	6.0	73.4	70.0
	Whitewell/L wr Whitewell Rd. Fairyknowe	69	21.1	12.0	149.0	140.0
	Whitewell/White City	38	14.3	8.5	107.5	100.0
	Agnes Street	27	26.4	12.0	91.9	110.0
	Ainsworth	65	13.1	8.0	91.5	100.0
	Ballygomartin/West Circular	54	22.8	14.0	114.2	130.0
	Brown Square	18	14.5	11.5	93.1	93.0
	Cambrai/Woodvale	261	12.2	7.0	80.6	90.0
Dover	59	15.1	9.0	83.3	90.0	
Shankill						

NIHE Local Office	Common Landlord Area (CLA)	Number of Allocations	Mean Average Months on the Waiting List at the Point of Allocation	Median Average Months on the Waiting List at the Point of Allocation	Mean Average Points at the Point of Allocation	Median Average Points at the Point of Allocation
NIHE Local Office	Florence/Hopewell	173	12.6	8.0	73.4	70.0
	Glencairn	156	11.9	8.0	69.0	70.0
	Highfield	78	13.0	7.0	95.6	101.0
	Lawnbrook	61	11.6	8.0	110.8	116.0
	Mid Shankill	166	17.1	8.0	115.3	120.0
	Springmartin	42	17.4	10.0	96.0	100.0
	Tudor	27	19.8	10.0	122.4	130.0
	Twaddell/Upper Woodvale	25	23.6	8.0	117.9	120.0
	Upper Shankill	59	15.9	11.0	102.6	110.0
	Albertbridge Rd.	195	16.6	8.0	90.1	90.0
	Annadale	67	23.8	17.0	133.3	122.0
	Arcarn	36	26.1	12.5	101.9	97.0
	Areema	46	17.4	10.0	128.0	119.0
	Ashfield	10	21.5	16.0	137.8	118.0
	Ballyhackamore	47	16.6	6.0	91.1	92.0
	Beattie	42	23.9	18.5	155.1	140.0
	Bloomfield/Ravenscroft	141	15.8	10.0	107.4	102.0
	Bridge End, Rotherdam Court	<10	23.1	10.5	113.5	115.0
	Clarawood	87	23.6	14.0	90.9	90.0
	Cromac	105	24.2	20.0	122.1	126.0
Donegall Pass	106	17.1	11.0	132.4	117.0	
Donegall Road	346	15.7	10.0	97.8	100.0	
Dundela	43	17.7	8.0	99.3	100.0	
Edenvale	23	22.9	10.0	106.5	94.0	

NIHE Local Office	Common Landlord Area (CLA)	Number of Allocations	Mean Average Months on the Waiting List at the Point of Allocation	Median Average Months on the Waiting List at the Point of Allocation	Mean Average Points at the Point of Allocation	Median Average Points at the Point of Allocation
	Finaghy	103	20.8	13.0	114.0	110.0
	Flush Park Belfast	30	22.3	12.0	143.1	134.0
	Garnerville	43	29.7	16.0	93.3	100.0
	Inverary	77	21.9	9.0	107.2	110.0
	Knocknagoney	29	21.0	14.0	106.0	120.0
	Lisburn Road	157	19.2	11.0	193.8	152.0
	Lower Ormeau	85	29.6	21.0	155.7	150.0
	Lwr Beersbridge/The Mount	167	16.6	11.0	102.5	100.0
	Newtownards Road	408	16.1	9.5	98.7	100.0
	Orchard Park	<10	54.0	54.0	136.0	136.0
	Sandy Row	155	17.3	12.0	120.4	110.0
	Short Strand	68	31.9	24.5	179.4	170.0
	Stranmillis	<10	9.7	12.0	270.0	300.0
	Summerhill	<10	17.6	15.0	115.6	130.0
	Sydenham/Sandbrook/Lisavon	92	20.6	11.5	114.3	110.5
	Taughmonagh	77	16.8	11.0	102.7	116.0
	Upper Ormeau	164	29.3	15.5	172.4	140.0
	Wandsworth	16	14.9	6.0	95.0	114.0
	Willowfield/Upper Castlereagh Road	94	24.9	11.0	116.7	118.5
	Woodstock/Ravenhill	437	20.1	13.0	135.7	130.0
Andersonstown	565	32.7	24.0	187.7	180.0	
Ardmoulin	<10	52.5	52.5	190.0	190.0	
Ballymurphy	12	43.8	31.5	176.8	180.0	
Beechmount	38	39.1	30.0	151.2	166.0	

NIHE Local Office	Common Landlord Area (CLA)	Number of Allocations	Mean Average Months on the Waiting List at the Point of Allocation	Median Average Months on the Waiting List at the Point of Allocation	Mean Average Points at the Point of Allocation	Median Average Points at the Point of Allocation
	Cavendish Street	23	51.9	45.0	201.4	192.0
	Divis Complex	44	27.3	19.0	168.0	170.0
	Falls Court/Clonard Cres	105	45.2	37.0	180.4	170.0
	Gransha/Downfine	<10	24.0	18.0	144.0	144.0
	Grosvenor Road	112	31.5	26.0	157.5	151.0
	Hamill St/John St	71	30.0	24.0	191.6	164.0
	Hannahstown	15	34.2	28.0	221.5	204.0
	Lower Suffolk	61	13.9	7.0	86.5	94.0
	Moyard	13	51.3	42.0	174.9	188.0
	New Barnsley	11	36.2	35.0	189.8	186.0
	Rockmount	<10	49.3	49.0	202.5	200.0
	Roden Street	24	38.5	29.0	164.1	160.0
	Springfield Road	50	36.3	32.5	190.0	178.0
	Springhill	22	38.0	35.5	189.0	191.0
	Springvale	<10	31.6	28.0	195.1	192.0
	St James	77	35.6	24.0	168.6	170.0
	Turf Lodge	38	49.6	44.5	169.6	173.0
	Westrock	12	19.3	19.0	135.4	122.0
	Whiterock	40	43.4	35.0	166.8	182.0
	N. Ireland Total	32880	19.0	11.0	115.5	120.0

CLA Twinbrook/Poleglass by Mean & Median Average Months on the Waiting List and Mean & Median Average Points at the Point of Allocation from 1st April 2012 – 31st March 2016

	Common Landlord Area (CLA)	Number of Allocations	Mean Average Months on the Waiting List at the Point of Allocation	Median Average Months on the Waiting List at the Point of Allocation	Mean Average Points at the Point of Allocation	Median Average Points at the Point of Allocation
NIHE Local Office	Twinbrook-Poleglass	540	31.5	26.0	183.8	180.0
Lisburn Dairy Farm						
N. Ireland Total		32880	19.0	11.0	115.5	120.0

CLAs Cushendall & Waterfoot by Mean & Median Average Months on the Waiting List and Mean & Median Average Points at the Point of Allocation from 1st April 2012 – 31st March 2016

NIHE Local Office	Common Landlord Area (CLA)	Number of Allocations	Mean Average Months on the Waiting List at the Point of Allocation	Median Average Months on the Waiting List at the Point of Allocation	Mean Average Points at the Point of Allocation	Median Average Points at the Point of Allocation
Ballycastle	Cushendall	12	17.4	3.0	103.8	110.0
	Waterfoot	<10	11.2	14.0	101.6	92.0
N. Ireland Total		32880	19.0	11.0	115.5	120.0

CLA Warrenpoint by Mean & Median Average Months on the Waiting List and Mean & Median Average Points at the Point of Allocation from 1st April 2012 – 31st March 2016

NIHE Local Office	Common Landlord Area (CLA)	Number of Allocations	Mean Average Months on the Waiting List at the Point of Allocation	Median Average Months on the Waiting List at the Point of Allocation	Mean Average Points at the Point of Allocation	Median Average Points at the Point of Allocation
Newry	Warrenpoint	118	24.4	16.0	150.9	150.0
N. Ireland Total		32880	19.0	11.0	115.5	120.0

Notes:

When a question of “average waiting times” is asked MEAN and MEDIAN averages are provided.

Reasons for this include:

- The MEAN is the arithmetic average and as a statistic can often be unreliable, having been skewed by significant outliers, i.e. applicants who have been on the waiting list for a number of years.
- This degree of skewing makes the arithmetic average, the MEAN, unreliable. Therefore, following expert advice on this matter, a methodology that utilises the MEDIAN (a measure of central tendency) as a more reliable indicator in relation to Allocations is also provided.

<10 are cases where numbers are less than 10

Data Protection Act 1998 - It is important to note the Data Protection Act 1998 regarding the potential risk of identifying individuals and individual households. Guidance from NISRA suggests that equality monitoring information should not be disclosed in sensitive cases where individuals or individual households could be identified. Also the Information Commissioner's Office (ICO) 'Anonymisation: Managing Data Protection Risk' Code of Practice states 'where less than 10 responses have been given to an answer that identifies something factual, all variables relating to that question have been suppressed'. However, 'it should be noted that attitudinal questions are not bound by this rule, in addition to responses of 'Don't know', 'Refused', 'Other' or similar. As the information provided is considered sensitive some statistical disclosure controls may have been placed on the tables with the omission of data in cases where there are less than ten Applicants.