PLANNING APPEALS COMMISSION

The Planning (Northern Ireland) Order 1991

Article 7

PUBLIC LOCAL INQUIRY INTO OBJECTIONS TO THE BELFAST METROPOLITAN AREA PLAN 2015

PART 2

REPORT ON LISBURN CITY COUNCIL AREA

by

Commissioners E Kinghan, A McCooey, A Speirs & M Jones

Date of Report: 8th July 2011
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APPROACH TO KEY SITE REQUIREMENTS

The purpose of this section is to set out our general approach to the matter of key site requirements attached to zonings. We consider that many of the key site requirements specified in the plan are not in accordance with the guidance set out in paragraph 39 of PPS1. The guidance states that development plans should set out the main planning requirements. It is clear that this is intended to address such matters as constraints to be overcome and specific issues in relation to the site. They should not read like universal infortmatives or planning conditions to be attached to every site without any thought as to whether they are actually key to the development of the individual site or not. We shall also address the situation where the matters specified are addressed by regional policy and so the key site requirements are merely duplication.

Acceptable Uses

We consider that there may be cases where the range of acceptable uses should be specified in the form of key site requirements. This would normally relate to employment or mixed use sites. The list of acceptable uses on employment sites that do not have specified uses, however, should be set out in the strategic employment section of the Plan and cross-referenced in each District Volume.

Density

PPS 12 requires minimum density levels to be set for housing sites within urban footprints and other sites as deemed appropriate. Maximum densities may also be specified where required. For this reason we consider that density does not need to be specified in every case. Where density has not been proposed as a key site requirement, it will be for the Department to consider if it is appropriate to include it in the adopted Plan. For the purposes of calculating the estimated yield from objection sites we have worked on the basis of a density of 25dph unless otherwise specified. It will be for the Department to consider individual proposals in accordance with regional policy where no density is specified.

Transport Assessment

Transport Assessment is addressed by Policy AMP 6 of PPS3 and requires developers to submit a transport assessment, where appropriate. We therefore consider that there is no need to include this as a key site requirement. Furthermore, many key site requirements in the Plan specify the highway improvements considered necessary. We consider that this may pre-judge the outcome of the transport assessment process. We note that paragraph 4.7 of PPS3 allows for the possibility that necessary infrastructure improvements may not be identified until the planning application stage. The plan should only specify matters that are known to be a constraint to development i.e. the development could not proceed without certain highway works being undertaken or additional public transport being provided, etc.

We note that the plan’s key site requirements often indicate that the layout shall provide for cycle and pedestrian links. We consider that this is a requirement of regional policy and should be addressed in the concept plan for the site and the transport assessment.

Similarly the plan often specifies that an Article 40 agreement may or will be required to ensure that necessary highway improvements and local facilities are provided. There
may be other means of achieving such provision. The issue is covered in general terms in GP 5 of PPS13, which states that developers should bear the costs of transport infrastructure necessitated by their development. An Article 40 agreement can be required at application stage should it prove necessary and we do not consider that specific reference to Article 40 agreements is necessary as a key site requirement.

**Landscaping**

Many of the landscaping requirements in the plan read as planning conditions. They are certainly not unique or key to the individual site. We consider that the retention of existing vegetation, buffer planting to the settlement limit and maintenance of open watercourses are covered by regional policy in PPS7 and are matters that can be addressed in the concept plan and at the detailed application stage. Guidance is also found in Creating Places and DCAN 8. Landscaping should only be included as a key site requirement in appropriate circumstances where there is a particular issue unique to the site in question.

**Flood Risk**

PPS15 states that development plans will not bring forward sites or zone land that may be susceptible to flooding unless in the most exceptional circumstances (paragraph 6.4). The plan attaches an almost standard requirement for a flood risk assessment for many zonings. We have several difficulties with this approach: most fundamentally that land at risk should not be zoned. In any case flood risk assessment is required by PPS15 where relevant. We consider that the Department should have assessed whether sites fall within a floodplain as part of the preparation of the plan. We do not endorse this type of key site requirement and consider that this is a matter addressed by regional policy and guidance in PPS15.

Notwithstanding the Department’s stated approach to objection sites where flooding is an issue, the correct approach is set out in regional policy. A site may be ruled out if it lies totally within the floodplain. If the extent of the floodplain is not known a flood risk assessment is a requirement of regional policy. Drainage assessment is a requirement of Policy FLD 3 in PPS 15 and key site requirements of this nature are a duplication of that policy and are unnecessary

**Concept Plans**

Planning Policy Statement 7 requires the submission of Design Concept Statements so we shall not impose this key site requirement. We may specify matters to be included in the Concept Statement. There may be instances where we consider that in line with Planning Policy Statement 7 a Concept Master Plan should be required to guide development of the site. We will indicate what matters need to be included in the Master Plans in order to address the complex issues involved given the scale of the site.

**Housing**

Housing recommendations will identify those sites to be held in the short term land reserve. Other sites recommended for inclusion in the Plan, including those within development limits, will be required to meet the Housing Growth Indicator and should be incorporated into the adopted Plan to meet needs to 2015.
Social Housing

We have recommended that the Department reviews housing zonings and objection sites recommended for inclusion in order to assess their suitability for social housing. It will be for the Department to impose key site requirements related to social housing on appropriate sites in the adopted Plan.

NOTES

i. Each volume follows the sequence of the relevant volume of the Plan i.e. objections to the settlement limits, then housing zonings, employment, etc.

ii. In view of our conclusions in Part 1 of the Report, objections to sites within Lagan Valley Regional Park will be addressed in a separate volume.
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<thead>
<tr>
<th>Abbreviation</th>
<th>Full Form</th>
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<tr>
<td>AOHSV</td>
<td>Area(s) of High Scenic Value</td>
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<td>ATC</td>
<td>Area of Townscape Character</td>
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<tr>
<td>BUAP</td>
<td>Belfast Urban Area Plan</td>
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<td>DOS</td>
<td>Development Opportunity Site</td>
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<td>HGI</td>
<td>Housing Growth Indicator</td>
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<td>LLPA</td>
<td>Local Landscape Policy Area</td>
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<tr>
<td>LCC</td>
<td>Lisburn City Council</td>
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<td>LVRP</td>
<td>Lagan Valley Regional Park</td>
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<td>MEL</td>
<td>Major Employment Location</td>
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<td>NLFR</td>
<td>North Lisburn Feeder Road</td>
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<td>PPS</td>
<td>Planning Policy Statement</td>
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<td>PSRNI</td>
<td>A Planning Strategy for Rural Northern Ireland</td>
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<td>RDS</td>
<td>Regional Development Strategy</td>
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<td>RLW</td>
<td>Rural Landscape Wedge</td>
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<td>RSPB</td>
<td>Royal Society for the Protection of Birds</td>
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<tr>
<td>SLNCI</td>
<td>Site of Local Nature Conservation Importance</td>
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<td>STLR</td>
<td>Short Term Land Reserve</td>
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<td>ULW</td>
<td>Urban Landscape Wedge</td>
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LISBURN CITY

Objection to Designation LC 01 Settlement Development Limit – Lisburn City
(Objection 1903/1)

Although the objection raises the issue of the settlement development limit, its basis is essentially that insufficient lands have been identified in the Plan for housing and employment uses. We have considered these strategic issues in Part 1 of our report and in the absence of specific lands being identified for inclusion we are unable to give further consideration to the settlement limit in the context of this particular objection. Other individual objection sites will be considered in the remainder of the report.

OBJECTIONS SEEKING ADDITIONAL HOUSING LANDS

NORTH LISBURN

Lands East of Boomer’s Reservoir

Objections 919 and 3019

Objection 919 comprises two fields east of the reservoir and north of the North Lisburn Feeder Road (NLFR). The front field contains an existing dwelling and a separate field gate onto the NLFR. The field slopes up from the road to a local crest. The site is defined by hedges. There are several isolated dwellings near the site.

Objection 3019 comprises some fields east and north of the reservoir. The site slopes upwards from the reservoir. The boundaries are defined by trees and hedges of varying heights.

We consider that the NLFR and Boomer’s Reservoir provide a very strong boundary for the city in this area. We do not agree that the presence of development on the other side of the reservoir (LC 04/08) justifies the development of either site. We consider that either site would breach a logical well-defined settlement limit and would lead to pressure for further development north of the NLFR. The settlement limit that would result from the inclusion of either site would be less defensible and would represent urban sprawl. We consider that the development of the site would be prominent and out of character. The fact that there is an existing field gate and that the fields are alleged not to be viable for agriculture do not represent factors that out-weigh our conclusions. We recommend no change to the plan as a result of either objection.

Lands West of Boomer’s Reservoir

Objection 3021

The site comprises some fields north of LC 04/08 as far as Brown’s Corner. There is an existing dwelling within the site. The eastern boundary is defined by the reservoir and trees to the north. The western boundary is Pond Park Road, which is proposed to be replaced by a new road within LC 04/14 in due course.
The Department considered that this site rounded off development in this area and would contribute to a more compact urban form. Its assessment was that the site should be included to meet the 3-year flexibility required in the plan. We agree that the site is well enclosed by the reservoir and could for the most part represent rounding-off, particularly in view of the large housing zoning on the opposite side of the road. There was no submission from the objector and the original objection merely requested that the land be brought within the settlement limit. We agree with the Department’s view that the land be allocated for housing. As it is not needed to meet the HGI, however, and in view of our conclusions in Part 1 of the Report, we recommend that it is held in the short term land reserve and only released if required.

We consider that a concept masterplan should cover all the issues identified by the Department. We have addressed our general approach to key site requirements elsewhere.

**Recommendation**

We recommend that the site is suitable for housing and should be held in a short term land reserve to meet housing needs beyond the end of the Plan period, if required. Development of the site should be subject to the submission of a concept plan for approval. This plan should address the relationship with the adjoining housing zonings and Pond Park Road.

**Objection 3377**

This was an objection to the exclusion of several existing dwellings and a commercial premises on Pond Park Road from the surrounding housing Zoning LC 04/08. The dwellings within Zoning LC 04/08 have been completed. We see no justification for the inclusion of these properties within the completed zoning and there was no evidence presented by the objector to persuade me otherwise. We therefore recommend no change to the plan as a result of this objection.

**Lands at Glenavy Road**

**Objection 2137 (including objections 100, 1919 and 3435)**

This site straddles Glenavy Road. The southern portion lies between Glenavy Road and Zoning LC 05/09, which is currently undeveloped. The northern portion includes mostly existing dwellings and curtilages around the Beanstown Road junction. Objections 100 and 1919 are contained within the site. Objection 3435 adjoins the site to the east. The plan accompanying the statement of case differed slightly from the original objection plan. It attempts to include no. 44a Glenavy Road in the site. It is not possible to extend the original objection site. The objection proposed that the site be zoned for housing.

The Department considered that the majority of the site and all of 3435 should be included and zoned for housing. We consider that the southern portion of the site represents rationalisation of the settlement limit northwards from LC 05/09 to Glenavy Road. The new limit would be defined by mature trees for most of its length. The site is below the level of the road and would be unobtrusive. We agree that it is suitable for development but is not needed to meet the HGI. In view of our conclusions in Part 1 of the report, we recommend that it is held in a land reserve and only released if required.
The northern portion of the site comprises of dwellings of varying plot sizes, mostly generous. This part of the site presents a built-up appearance. The Department considered that all of the 2137 was suitable for inclusion, except two small portions i.e. land to the rear of no. 28 Glenavy Road comprising a paddock and secondly, two dwellings and a field to the east of Beanstown Road and north of objection 3435. The boundary definition provided by the rear of the dwellings' curtilages and Beanstown Road is strong and defensible. We support the exclusion of the two areas identified by the Department above because they are outwith the existing strong boundaries. The remainder of the objection site should be included within the development limit. We do not consider that this part of the site should be zoned for housing because it contains existing dwellings for the most part. This would not preclude any proposals for redevelopment from being considered in the context of these lands now being within the development limit for Lisburn.

Objection 3435 lies adjacent to Zonings LC 04/05 and LC 04/14 and, with the inclusion of the lands to the west within the development limit, represents a clear notch in the development limit in plan form. This part of Beanstown Road is a very narrow country lane with right angle bends. The frontage to Beanstown Road is defined by an existing dwelling and very attractive woodland associated with a small stream. The remainder of the site is similar to the adjoining zonings in terms of landform and vegetation. We agree with the Department that provided access is from the adjoining zonings and the existing vegetation is protected then the remainder of the site is suitable for housing. It is not needed to meet the HGI, however, and should be placed in a land reserve. We have addressed our general approach to key site requirements elsewhere.

We cannot agree with the counter-objector who considered that the objections would mean that Lisburn would not expand in a planned way and that the Green Belt status of the site should be protected. The plan process is concerned with the proper planning of the area. It is such material factors that we have taken into account in reaching our conclusions on this site. PPS21 has removed the policy basis for Green Belts from planning policy in Northern Ireland and so the latter comment is now without foundation.

**Recommendations**

**Objection 2137 (South of Glenavy Road)**

We recommend that the lands shown on Plan 1 are suitable for housing and should be held in a short term land reserve to meet housing needs beyond the end of the Plan period, if required. Development of the site should be subject to key site requirements to address the following matters:

- The submission of a concept plan for approval. The plan should address the relationship with the adjoining housing zonings and the provision of a landscape buffer along the western boundary of the site to supplement the existing trees and hedges and define the settlement limit.

**Objection 2137 (North)**

The land shown within the Proposed Revised Development Limit on Plan 1 should be included within the development limit for Lisburn City.
Objection 3435

We recommend that the site is suitable for housing and should be held in a short term land reserve to meet housing needs beyond the end of the Plan period, if required. Key site requirements should address the following matters:

- Access only from the adjoining housing zoning LC04/14.
- No development within the stream corridor along Beanstown Road and the northern boundary of the site. The existing trees and hedges in this area to be retained. Proposals for the long-term management of this area to be submitted for approval. New landscaping to be provided to the northern boundary of the site.

LISSUE AREA

Objections 2529/6 & 259

2529/6 was a very large site west of Lisburn between Glenavy Road and Ballinderry Road, extending from the development limit to Moneybroom Road. This was reduced at the inquiry to a smaller site comprising the southern portion of these lands. The southernmost fields (along Ballinderry Road) were not included in the objection. However, they are included in objection 259. We have therefore considered the objections together.

The Department conceded that the reduced site (all of 259) was acceptable, provided that there was no development in the Moneybroom Wood SLNCI in the NE corner of the site. We agree that the site is in a general location favoured by the RDS. The proposed development limit is to a public road, which is clear and defensible. That being said, the existing development limit (carried over from Lisburn Area Plan) is defined by a strong boundary of mature trees. These have been retained as part of the development under construction on zoning LC 04/13. We have some concerns that the extension to the west would be excessive. This site would project well beyond the existing limit and beyond employment zoning LC 09 to the south. The Department estimate the site area as 58 hectares, yielding 1448 dwellings. The site contains mature trees and a SLNCI designated for its attractive woodland and wetland. We consider that the site is not acceptable in terms of urban form and excessive size. We recommend that the site is not included within the development limit.

Lissue House (Objection 264)

Lissue House is a large listed building currently in use as the HQ offices of the Livestock and Meat Commission. The site was formerly a hospital. The entire site is a proposed LLPA and the NE portion is a proposed SLNCI. The site adjoins the development limit (LC 09), which follows the driveway to Lissue House and is defined by a fence with some trees. It is mostly open along the boundary of the site. The northern boundary of the site is defined by a high shear embankment and so the site is elevated above Ballinderry Road. The listed building has a considerable number of outbuildings to the north. We were informed that planning permission had been granted for 2 dwellings to replace some of these outbuildings; others would remain in situ. The objection seeks the inclusion of the site within the development limit as
whiteland. The objector made it clear at the inquiry that major development was not proposed on the site. No development was suggested within the SLNCI and there was no objection to the LLPA provided that it did not totally preclude any development on the site.

The site would represent a modest addition to the development limit in this area. The Department had conceded the triangle of land NW of LC 09 (defined by Ballinderry and Lissue Roads) for residential development. The objector (Lisburn City Council) confirmed that this site was no longer being pursued. Nevertheless the Departmental concession means that this site would have been included within the settlement limit by default.

We agree that parts of the site do present a more urban appearance i.e. the house, car park terrace, a rear yard and extensive outbuildings. The site boundaries defined to the north by a major embankment and to the west (NW) by trees would represent a strong development limit. We consider that any development on the site would be limited by the setting of the listed building and by the LLPA designation. The LLPA would not totally preclude development and so we consider that there is no objection to the designation in the objectors’ own words. The SLNCI was not objected to either, as there would be no development in this area. We consider that problems related to vandalism outside office hours could have been resolved by the planning permission for two dwellings on the site. In the light of the Department’s concession, the site boundaries, its limited scale and the buildings on the site we consider that the site should be included with the development limit as whiteland.

**Recommendation**

We recommend that the site be included within the development limit for Lisburn.

**PLANTATION AREA**

**Objection 2141 – Hillhall Road to Ballynahinch Road**
(Also includes other objections listed below)

We set out the agreements that were reached in respect of the objections in this area and the remaining areas of dispute. We also wish to clarify what objections were withdrawn and what sites were reduced.

In relation to the sites between Ballynahinch Road and Saintfield Road: we note that objection 934 was withdrawn, as was that part of 2140 within 934 and objection 3273. It is clear that the objections were withdrawn because a large garden centre has been approved on that site. At the time of writing this store was under construction together with a right turning lane on Saintfield Road. We are also aware that the site had benefitted from planning permission for a hotel, granted several times over the years since the 1970s, the last being in 2002. However, these lands are still before us because they were included in objections 2022/3, 2985 and 3690. We note that overlapping objections 3073, 3690 and 3692 were reduced to a smaller site by the objectors in their statement of case.

The RDS identifies Lisburn as a major growth location, particularly in view of its accessibility to key transport corridors. This area is adjacent to a major junction on the
M1 and accessible to Lisburn city centre and its transport links. We can see the logic of the Department’s concessions in this general area. The strategy to avoid the nearby AOHSV and LVRP in the conceded lands is justified and logical. We support the concessions as indicated on the Department’s map. The limit would generally follow field boundaries. The concessions would allow for comprehensive planning in this area and the provision of an orbital road relieving pressure on the roundabout under the M1 (discussed below). The sole remaining question is whether the proposed road should constitute the boundary. We consider that this is a detailed design matter. But where it is the boundary, generous planting will be required as a landscape buffer along the road. We consider that this matter can be considered as part of the Masterplan process. In summary, we agree with the Departmental concessions in general terms subject to certain exceptions, which will be discussed below.

Lisburn City Council wished to see an orbital road provided in conjunction with residential development on any additional sites. This would run from Hillhall Road to Ballynahinch Road, linking Plantation and Saintfield Roads in the process. The Department conceded that this was a good idea and stated that additional lands could be included within the settlement limit in order to meet the requirement for 3-year flexibility and in order to fund the road. They expressed some concerns regarding the final leg of the proposed road from Saintfield Road to Ballynahinch Road. It was considered that development south of the store would erode the gap between Plantation and Morningside to the SW. However, at the Inquiry they agreed that a road link was required at this location. An indicative line was agreed and presented to the Inquiry. This seemed to be agreed at the behest of Roads Service; who were opposed to a staggered junction on the Saintfield Road. We consider that the proposed road from Hillhall Road to Saintfield Road is a valuable idea.

The Department had already conceded that the land contained within objection 934 (subsequently withdrawn) should be included within the development limit. This comprises the garden centre site and the field to the south. We question the case for the final western leg of the road because of the Department’s concerns and the approval of the garden centre. We also question the need for additional housing land in this location and its deliverability given the presence of the garden centre and the Department’s generous concessions south of LC 04/10. We therefore consider that should this stretch of road be required then it should follow the line shown on the Turley Associates plan rather than the dotted line agreed at the Inquiry. This is despite the concerns of Roads Service, which were not clarified for us at the inquiry.

The conceded lands include all or most of the following objections – 662, 2022/3, 2985, 3073, 3074, 3241, 3690 and 3692. Objection 2140 encompassed all of the above lands. The objector was content with the Departmental concessions save for two areas: north of Hillhall Road and west of Saintfield Road. We have addressed the area between Saintfield Road and Ballynahinch Road above. Our comments also apply to the small part of the reduced area of objections 3073, 3690 and 3692 that was not conceded by the Department. We will address the area north of Hillhall Road in the Lagan Valley Regional Park volume of our report.

Plantation Amenity and Planning Action Group (objection 3584) expressed concerns that the inclusion of additional lands at Plantation could not be accommodated by the existing roads infrastructure. We consider that the provision of the orbital road and the improvements to the Saintfield Road roundabout that have already been implemented
would address these concerns. We note that Roads Service had no objection to the Department’s concessions.

One objector made the point that sites found to be acceptable in the Department’s June Paper should not be required to contribute to the orbital road. We do not concur with this view. This would only apply to 934 (now the site of the Garden Centre) and 3241 (small site filling the triangular gaps in the development limit to the south of Plantation). 934 is withdrawn and already developed. It would be extremely difficult to disaggregate 3241 from the remainder of the lands for this purpose. It would also be contrary to proper comprehensive planning of the area.

The lands considered suitable for housing are not needed to meet the HGI and in view of our conclusions in Part 1 of the report, we recommend that they are held in a land reserve and only released if required.

**Recommendations**

We recommend that the lands shown within the ‘Proposed Revised Development Limit’ on Plan 2 are suitable for housing and should be held in a short term land reserve to meet housing needs beyond the end of the Plan period, if required.

We consider that key site requirements should address the following matters:

- The submission for approval of a Masterplan to facilitate the comprehensive development of the site as a whole.
- The provision of an orbital road linking Hillhall Road – Plantation Road – Saintfield Road – Ballynahinch Road to be fully funded by developer contributions.
- The developer should be aware that improvements to Hillhall Road and Saintfield Road may be required, depending on the conclusions of a transport assessment for the additional lands.
- Landscaping along the proposed orbital road as appropriate. Other landscaping issues can be addressed as part of the Masterplan process.

Other key site requirements have been addressed in our general approach outlined previously.

**Objection 2141 – Lands North of Hillhall Road (see LVRP Volume)**

**Objection 3178 – lands South of Hillhall Road**

One field of this objection was conceded by the Department as part of objection 2140. The remainder of the site falls to be considered. The eastern half of the site is within the area of high scenic value. There was no associated objection to this designation. We agree with the Department that this is a constraint on development. We consider that the remainder of the site (outwith the conceded field) if included would represent an unwarranted intrusion into the countryside. It would create an illogical extension to the settlement limit in one direction and has not been justified by any exceptional circumstances. The remainder of the site would relate poorly to the other sites conceded by the Department and would be outside the proposed orbital road. We recommend that the remainder of this site is not included within the development limit.
Objection 2814 – lands at Clogher Road

This site runs SE along the Clogher Road and contains a farm complex at its northern end. It is quite elevated and prominent. It is wholly outside the conceded lands and not connected at all. The inclusion of the site would result in a narrow peninsula of development running away from the rest of the limit and separated from it by Clogher and Plantation Roads. This would clearly be unacceptable and we recommend that the site remain outside the development limit.

HOUSING ZONINGS

LC 03/08 – Hilden (objection 1586/8)

We do not agree with the objector that there is a fundamental incongruity in there being a housing zoning within an ATC. New development is required to complement the character of the ATC. It is not an indicator that the area did not merit designation. The objection does not seek to achieve anything. We note that the site has been cleared of buildings and several new dwellings have been completed. We consider that there is nothing further to address in this objection and we endorse the housing zoning.

LC 04/06 – Belsize Road; LC 04/07 – Land S. of Knockmore Park; LC 04/08 – Boomer’s Reservoir; LC 04/13 – Brokerstown & Ballinderry Roads; LC 04/11 – Land at Stockdam Road; LC 04/14 – Lands at Aghnahough and LC 05/09 – Glenavy Road; LC 05/08 – Hillhall Road (Objections 4, 1999, 2902, 2959/1, 3016, 3213, 3217, 3222, 3224, 3259, 3266, 3464 and 3584)

These objections related to the key site requirements for the zoning. The Department conceded that as there was an extant planning permission on the sites then these requirements were no longer necessary. We agree with this approach and consider that this would address the concerns of the objectors. We recommend accordingly.

Recommendation

We recommend that the key site requirements for the above Housing Zonings be deleted from the plan.

LC 04/09 – Land at Causeway End Road (Objection 325)

The objection identified the above zoning and objected to all of this land not being included for residential use within the settlement limit. The site is zoned for residential use and is within the settlement limit. There is consequently no valid objection to the plan proposals contained within this letter.

LC 05/06 – MOD Playing Fields, Kirkwoods Road (objections 208 & 2022/34)

The objections related to the use of the land as playing fields. Lisburn City Council stated that they had leased the site from the MOD for at least 20 years. The Gaelic Football Club that actually use the pitches has been doing so for 15 years. This is clearly existing recreational use of the site that has not been recognised by the
Department. Government Policy, Planning Policy Statement 8 (open space and recreation) and BMAP itself state the importance of the provision and retention of outdoor recreation facilities. In this case, a current facility in use is proposed to be re-zoned, despite the objections of the local authority and local club. The Department’s statement of case provides no justification for the failure to recognise this recreational use in the plan zonings. There is no explanation in the plan or technical supplements quoted. The description of the zoning in the plan even refers to playing fields.

We consider that the loss of this open space recreational facility has not been justified by the Department. Urban capacity studies must recognise existing open space and recreational facilities. They should not be zoned for an alternative use without clear justification and such justification has not been provided in this case. We agree with the objectors that the site should remain as open space and should be so indicated in the plan. We therefore recommend that the zoning is deleted from the plan and that the site is shown as existing open space.

**Recommendation**

We recommend that zoning LC 05/06 is deleted from the plan and that the site is identified as existing open space.

**Objection 2022/33 – Comprehensive Design Scheme for housing zonings LC 03/15, LC 04/06 and LC 05/06 together with the eastern portion of open space proposal LC 38**

We fail to see what a comprehensive design scheme would achieve. We agree with the Department that comprehensive planning of an area is addressed by regional policy in PPS7. In any event, development has commenced on zoning LC 03/15. Planning permission has been granted for development of LC 04/06. The council objects to LC 05/06. We support that objection and have recommended that the Zoning be deleted. We therefore recommend that there is no change to the Plan as a result of this objection.

**Suggested Social Housing Zonings (objection 3825 – NIHE)**

**Lisburn City**

NIHE indicated 4 “opportunity sites” suggested for social housing. We would generally support increased provision for social housing in the light of our conclusions on the topic in Part 1 of this report. The submitted plans did not identify the site boundaries and the objection states that site boundaries and suitability for development would be subject to full investigations as feasibility studies have not been undertaken. In this context, we can do little but indicate the general location of the sites and recommend that the Department pursue the feasibility of social housing zonings with NIHE. Site A appears to be an area of white land at Bentrim Road, south of Zoning LC 02/08. The land is fenced off and appears to be vacant. Site B appears to be the car park south of Benson Street (between Benson Park and Thiepval Road). This is a well-used long term car park and its loss to housing may not be appropriate. Site C appears to be within Zoning LC 12 and could relate to objection site 976. We have recommended that this part of the employment zoning be released for housing development and the Department could include a requirement for social housing on the foot of this objection. Site D could relate to an area of white land south of Moira Road, west of Zoning LC 02/05. This site is in
the vicinity of the M1-Knockmore link road (Proposal LC 17/01) and Zoning LC 07. Any social housing zoning should not prejudice the road scheme. We have recommended that additional lands in this area are included within the Zoning LC 07. The Department could explore the feasibility of liaison with the developers on this social housing proposal.

**Recommendation**

In view of our recommendation in paragraph 3.3.16 of Part 1 of our report, the Department should pursue the feasibility of zoning these locations for social housing with NIHE and identify site boundaries as appropriate.

**Lands at Ballymacoss**

The objection refers to a small triangle of land that was formerly zoned for housing and is shown as white land in the Plan. It states that a concept plan has been approved for a Housing Association scheme. The land lies south of Zoning LC 05/07 (Social housing zoning LC 06/06) and was zoned for housing in Lisburn Area Plan. A large church has been constructed on this land and so it is not available for development. We recommend no change to the Plan as a result of this objection.

**EMPLOYMENT**

**Objections Seeking the Inclusion of Lands within the Settlement Limit**

**Lands between LC 09 and LC 15**

(Objections 180, 253, 424, 2022/1 & 4, 2081 and 3090)

Lisburn City Council objected to the Plan on the basis that there was insufficient employment in west Lisburn. A site for inclusion was identified in their objection. We were informed that the portion of the site north of the Antrim rail line (west of LC 09) was no longer being pursued. The Department accepted that the remainder of the site should be identified for employment use. It includes all of objection sites 180, 2081, 3090 (same site) and objection site 424.

The triangular site east of Lissue Road between LC 09 and LC 15 has been partially developed to provide a cola bottling plant and distribution centre. This is a major complex occupying a large part of the site. We consider that the inclusion of this site for employment use is therefore a *fait accompli*.

Objection site 424 is west of Lissue Road and defined by Lissue Lane to the north and Cross Lane to the west, both of which are public highways. The existing Lissue Industrial Estate lies immediately to the south on the opposite side of the railway line. Its location and well defined boundaries could make it a logical area to include for employment uses. However, we are not persuaded of the need for further employment land in view of the generous provision in this area, including Zoning LC 07.

Objection 253 included some of the lands that we have considered above plus 3 fields north of Lissue Lane and west of Lissue Road. The inclusion of these lands within the settlement limit would breach the strong boundary provided by Lissue Lane. The field boundaries are weak and irregular. They would be less defensible than a road as a
development limit. The need for employment land would be met by the lands to the south. We therefore consider that these 3 fields should not be brought within the settlement limit.

The Department’s key site requirements for the conceded site read as though they related to a housing zoning. They are not consistent with the key site requirements for the adjoining zoning LC09. No explanation was offered for this difference in approach. We agree that a Masterplan should be submitted and approved in order to guide the comprehensive development of this large site and address such issues as linkages to other lands in the area including to Lissue Road/Moira Road (including pedestrian and cycle links), the relationship of development proposals to residential properties and structure landscaping (including belts of landscaping to define the settlement limit should that be appropriate). Transport assessments are a requirement of PPS3. Identifying the necessary improvements pre-judges the outcome of this assessment and does not take into account the works that may already have been undertaken or paid for by other developers.

**Recommendation**

We recommend that the lands identified in objections 180, 2081, 3090 (same site) be included within the settlement limit and zoned for employment uses subject to the following key site requirement:

A Masterplan to be submitted to and approved by the Department in order to guide the comprehensive development of this large site and address such issues as linkages to other lands in the area including to Lissue Road/Moira Road (including pedestrian and cycle links), the relationship of development proposals to residential properties and structure landscaping (including belts of landscaping to define the settlement limit should that be appropriate).

**South of Lissue Industrial Estate**

**Objections 3455, 280, 255 & 718**

Objection site 3455 lies south-west of the Knockmore Road junction and extends westward as far as Eastwood Car Sales premises and south as far as the River Lagan. The other objections are all contained within this overall site and no further information was provided to explain the rationale or basis of the objection. The objections sought the inclusion of the site within the development limit and some indicated for residential and one for commercial uses. The site is in mixed use with some dwellings and businesses along the road and low-lying fields to the rear. The western portion of the site contains Eastwood Motors; who occupy a large site with a substantial raised parking area to the rear. There is a terrace of dwellings to the front and a large older dwelling and mature gardens to the east. The site is within the very large Knockmore LLPA (LC21). None of the objections are to this LLPA.

We were informed that part of the site was inside the development limit in the old 1982 Lisburn Area Plan. The Department’s only concerns about the inclusion of the site was the floodplain and the LLPA designation covering the site. At the inquiry the Department accepted that part of the site could be developed for housing. The floodplain must be excluded from any development. We were not provided with a floodplain map by the Department. However, we can see that the parts of the site near
the road are at a higher level than the fields to the rear. We had some indication of the suitable parts of the site from the objector’s ecologist. The developed portions of the site do not contribute to the identified important features of the LLPA in the designation. We agree that all of the site should be included within the development limit. There is a strong boundary hedge to the west of the site and the river is closer to the Moira Road at this point. We consider that the Department should identify the extent of the floodplain and zone this portion of it as open space. The simplest approach would for the adjoining open space zoning LC 37 to be extended. The objections that refer to this issue were content with this approach. This would ensure access to the river, which was the concern of Lisburn City Council (counter-objector). We consider that the remainder of the site should be unzoned. This is because of the mix of commercial and residential uses in this area and because of the nature of the objections themselves. Objections 255, 280 and 3455 only sought the inclusion of the site within the limit. Objection 280 also referred to HOU1 and so is the only objection that mentioned housing at all. Objection 718 sought the inclusion of the land for commercial purposes in conjunction with the car sales business. Either use would be acceptable in principle. The inclusion of the site within the development limit would mean that either a housing or commercial development could come forward and be assessed against the impact on the LLPA and other material considerations. A small part of the site fell within the scope of objection 932 related to extending the Blaris employment zoning (LC 07). We will consider that objection below under LC 07.

**Recommendation**

We recommend that the site is included within the settlement limit. The floodplain of the river Lagan within the site should be identified by the Department and zoned as an extension of open space zoning LC 37. The remainder of the site should be unzoned.

**Lands west of Halftown Road**

**Objections 3095 & 3097 (incorporates objection 722)**

These are two adjoining sites west of Halftown Road, between Moira Road and the river. 3095 includes a car sales business and a dwelling on that part of the site closest to the Halftown Road. The remainder of the site and all of 3097 comprises fields. There was an additional objection on part of 3097 by the same objector for the same purpose. We consider that this area south of Moira Road retains an open rural character, notwithstanding the commercial uses in the vicinity and on part of the sites. We do not therefore agree that these lands are more suitable than those designated in the Plan and no reasoning was provided to explain otherwise. We do agree with the Department that ample land has been allocated for employment in this area e.g. LC 07, LC 09 and LC 15. We therefore see no need to allocate additional commercial land in this area.

We do not agree that any part of the sites were included within the development limit in any previous Area Plan that was drawn to our attention. We consider that the Halftown Road and Moira Road form strong and defensible boundaries in this locale. In view of the mostly open rural character of the sites we consider that they should both remain outside the development limit. We are aware from other objections in this vicinity that the sites may lie within the floodplain and that factor may preclude development, in any event.
EMPLOYMENT ZONINGS

ZONING LC 07 – MAJOR EMPLOYMENT LOCATION – LANDS AT WEST LISBURN, BLARIS ROAD
{Also Designation LC 21 – LLPA Knockmore and Proposal LC 37 – Open Space West Lisburn}
(Objections 73, 450, 588, 702/7, 733, 762, 768, 772, 932, 1856/11, 2022/10-13, 3117, 3824/14)

There is a clear focus in the RDS on accommodating new housing and employment uses to serve the BMA. The guidance for the BMA clearly identifies areas for planned lateral expansion on the key transport corridors at Lisburn (Spatial Development Strategy for the BMA p. 50). BMA 2.1 lists West Lisburn/Sprucefield as one of the strategic locations for employment growth. Lisburn is identified as having high growth potential and the scope to accommodate significant housing expansion reflecting its strategic location at the meeting point of key transport corridors and also refers to the promotion of Lisburn’s continued development as a strong employment base (BMA 1.2 – Lisburn 1st bullet point, page 70).

We must firstly consider the use of the zoning as this may affect our deliberations on the principle of development. Objection 932 also related to the inclusion additional lands to the west of the Zoning within the settlement limit. The Department assessed those lands at an early stage and considered them suitable for residential development. It recommended that they be allocated for housing development to meet the “three-year flexibility” for housing land. This seems to have set the template for the re-consideration of the overall zoning. The Departmental statement of case refers to the importance of the site for employment use and that the majority of the zoning should be retained for that use. At the Inquiry this stance changed and the Department agreed with the objectors that the zoning should be for mixed use, comprising equal proportions of employment and residential development. The objectors were obviously content with that approach. They had argued that there was a live planning application that reflected this mix of uses. Interestingly, the objectors’ Proposals Plan for the site indicates that the additional lands outside the settlement limit were proposed for employment use as part of a Strategic Investment Park.

We have concluded in Part 1 of our report that it is necessary and appropriate to provide an ample supply of employment land in the interests of facilitating economic development flexibility and choice. We were also conscious of the importance of employment land to economic development and the extent to which this issue underpins the rationale of the Plan. We have noted the wider range of business uses that are acceptable on employment sites than were considered suitable for the old fashioned industrial estates. The importance of the location for the employment strategy of the BMA and Northern Ireland is stated in the RDS. The developers and the Department also referred to the strategic significance of this particular location for employment. We consider that the site is one of two crucial zonings of new employment land on the periphery of the Metropolitan Area. It is a designated Major Employment Location in the Plan. This is a key site in a highly accessible location at the junction of the M1 and A1, close to the railway line. The proposed M1 – Knockmore Link will provide direct access to the strategic highway network. These prime locations providing optimum employment land are rare, in contrast to the wider range of available housing land. The scale of the site is important for accommodating potential employment uses requiring an
extensive land take. An example of this is the recently completed Coca-Cola plant at Lissue, which occupies a very large site. Given this context we are surprised that the Department changed its view on the zoning and agreed to the effective reduction of the site by accepting residential development on half of the (albeit enlarged) site. We consider that no convincing evidence was presented to justify this departure from the Plan’s key provisions. The Department did not justify why its opinion changed in respect of the requirement for employment land in this strategic location.

We consider that the site is a prime location for employment use to meet the employment needs of the BMA and the strategic directions of the RDS. We have addressed the point that the objectors made regarding the strategic directions for housing growth in the RDS in part 1 of our report. We concluded that the RDS refers to Lisburn City generally as the location for growth and not just West Lisburn and certainly not the Blaris area; even the use of the term west Lisburn could relate to a wide area to the west of the city. On the other hand, the RDS does specifically refer to the Sprucefield/ West Lisburn area as a strategic location for employment growth. We have considered objections seeking additional housing lands and recommended that some of these sites are included to meet the STLR. The objectors’ argument that this is the only realistic option for expansion of Lisburn is therefore entirely misplaced. We consider that this area is far from ideal for housing purposes in view of its relatively isolated location from other housing and the fact that it is surrounded by major employment uses, retail development and roads infrastructure. The RDS does refer to mixed use developments but this is primarily related to inner urban locations or ensuring that urban extensions provide more balanced communities. There is no reference to adopting this approach in west Lisburn. There was another argument that there may be benefits in terms of housing development contributing to the funding of the M1-Knockmore link road. We recognise the importance of this road for development in the whole of west Lisburn. However, we note that many of the existing housing zonings in the Plan have key site requirements relating to a contribution to the link road. We consider that employment zonings should also contribute equally to this road, as they are major traffic generators and would benefit equally from the road. We conclude that no part of this zoning or any additional lands around the zoning should be allocated for housing in the Plan because of the importance of the zoning for employment as outlined above. We have considered the most northerly portion of the site to the west of the M1 – Knockmore Link road separately as part of our assessment of the objection sites south of Lissue Industrial Estate. This land is outside the zoning.

We must now consider the issue of the additional lands suggested by objection 932 for inclusion as employment lands within the settlement limit. As we consider that the original zoning in the Plan should be retained for employment use there would appear to be no justification or need for more employment land, especially given the Department’s final position on the zoning. We will consider revisions to the LLPA and open space zonings within the development limit later in this section. The outcome of these deliberations may increase the size of the employment zoning but within the settlement limit proposed in the Plan. We consider that the proposed road represents a clear and logical definition for the settlement limit at this location. We do not agree that there need necessarily be development on both sides of this new road.

Objections 762 and 772 related to specific parts of the site and simply objected to those sites being zoned for employment uses. There was no rationale or explanation for the basis of these objections provided. We cannot therefore assess them further.
Objection 73 contained a large part of the existing zoning and some of the additional lands above as discussed in the previous paragraph. A part of these lands was already within the settlement limit and we have considered the part of this site that overlaps with objection 932 above. This leaves a portion of the site to the west of objection site 932 to be considered. As we consider that the lands to the east should not be included, it follows that we also consider that this site should not be included for either employment or residential use. This land is within the identified floodplain and the proposed LLPA LC21. The objection does not refer to the LLPA at all and there is no other objection to this part of the LLPA. We also consider that it would be contrary to PPS15 to zone land within the floodplain for development and therefore consider that it should remain outside the settlement limit.

Objection 450 sought the removal of the zoning of the site for any development because of the presence of the top quality classification of Best and Most Versatile Land on the site. This is the top 5% of land in Northern Ireland and is obviously a finite resource. The fact that the site contains land of this quality was not disputed by the Department or counter-objectors.

The objectors referred us to SPG-ENV 1 and the last bullet point under ENV 1.1 – protect the best and most versatile agricultural land as an important and finite regional resource as far as practicable. We note the use of the term as far as practicable and the fact that there are competing policy imperatives within the RDS itself. The RDS is an over-arching strategic planning framework and does not contain operational policy statements. There was formerly a clear policy imperative to protect such land contained in Policy AG1 of “A Planning Strategy for Rural Northern Ireland”. The policy provisions of PPS21 Sustainable Development in the Countryside take precedence over Policy AG 1. There is no policy regarding agricultural land quality in PPS21. This distinguishes the situation now from the policy context at the time of the Commission’s consideration of the 1983 Lisburn Area Plan, where the Commission recommended exclusion of this site on the basis of agricultural land quality. Further operational policies are necessary to give effect to the strategic guidelines in the RDS. In this case, there are no operational policies related to the protection of the best and most versatile agricultural land.

We were presented with no evidence as to the quantum of BMV agricultural land within the site or what percentage of the Northern Ireland total would be lost to development. In the absence of this information we have no context in which to judge the significance of the loss of this site or parts of the site containing BMV land. We consider that the clear policy direction and over-arching strategic guidelines for the development of the BMA are focussed on expansion at Lisburn. The constraints of the Belfast Hills, Areas of High Scenic Value and Lagan Valley Regional Park mean that the opportunities for significant expansion are confined to south and west Lisburn. This location is well-served by transport and is at the meeting point of key transport corridors including the main Dublin-Belfast road and rail lines. We have already concluded that this is a prime location for economic development and employment opportunities, as per SPG-ECON 2 (ECON 2.1). Our conclusion is that the strategic directions of the RDS outweigh the agricultural land quality issues. We consider that this is a case where it is not practicable to protect the high quality agricultural land. The statements in relation to sustainability and prudent use of natural resources have to be balanced against the need to provide for the future development needs of the BMA, which is a key function of the RDS and this Plan.
A great deal was made of the timing of the Department of Agriculture and Rural Development’s consultation reply. Nevertheless there is no objection from that Department to the zoning. We do not agree with it that agricultural land quality is no longer an issue simply because Policy AG1 has been superseded. We have considered this issue above.

The Maze site (LN09) has been identified as a strategic land reserve of regional importance. This role has been reinforced by references to the site incorporated into the RDS by the adjustments published in June 2008. In this context, it would not be appropriate to consider the Maze site as an alternative to the LC 07 zoning. The Department and objectors (including the agent for this objection) accepted that there was a need for additional employment land in west Lisburn and some additional land at Lissie has been recommended for inclusion within the development limit for employment uses. It should be noted that a significant proportion of this site has been developed (Coca-Cola plant). The other major employment zoning in the area – LC 09 has been substantially developed since the technical supplement was prepared. This dilutes the objectors’ arguments regarding there being little need for additional employment land still further. We note the objectors’ long history of family involvement in the area, but consider that this is not a factor that we can take into account in the zoning of land in a development plan context. We were not presented with any evidence of an over-riding nature conservation interest on the site. There are no nature conservation designations in the Plan and the Department did not suggest any such designations on the site. The open landscape along the River Lagan is to be protected by zonings as open space and as a LLPA.

We cannot sustain this objection to the principle of development of the site and recommend no change to the Plan as a result of the objection.

Office development (objections 932 and 2022)

The objectors initially argued that office uses within Class B1 (a) should be allowed on the site with no restrictions. At the inquiry this stance was changed to request that up to 9,290 m² of floorspace should be allowed with Departmental authorisation required for anything beyond that figure. The basis for this figure was a planning permission that had been granted for that amount of floorspace at Sprucefield in 2001. This planning permission was not implemented and has now lapsed. We do not consider that this floorspace can be used as a figure for Blaris because of the time that has elapsed and the differing policy context applicable in Sprucefield as a regional centre. This policy context was obviously a factor in the approval of business uses in association with the retail development that has since been constructed (Sainsbury’s, etc.) The status of this planning permission in terms of its partial implementation by the construction of the retail units is not a matter for us to determine. The Department considered that the figure of 5000 m² as used at Titanic Quarter was more appropriate in order to protect Belfast and Lisburn city centres. We acknowledge the evidence that was provided regarding the need for speed in attracting inward investment and the development of business parks at key accessible locations around other cities in the UK and Ireland. We also acknowledge the expert advice of letting agents supported by Invest NI. However, as we stated in our consideration of the issue in relation to Titanic Quarter, we consider that the exceptional clause operated satisfactorily there and should do so in this case also. If it can be shown that there is a need for larger offices and that they cannot be accommodated in city centre locations then the case can be made for them to be allowed on this site.
LLPA (Designation LC 21) and Open Space (Designation LC 37) Issues
(objections 588, 733, 768, 932, 1856, 2022 and 3117)

At the Inquiry there was significant agreement between the objectors, Department and Lisburn City Council on the precise delineation of the LLPA as it affects the zoning. The only remaining difference appeared to be regarding the open space designation. The Department and objectors considered that it was unnecessary because the LLPA would protect the area and key site requirements could address the provision of a riverside park, which the Council desired. Lisburn City Council requested that the LLPA also be zoned as open space. We do not accept the argument that an open space designation would impose severe restrictions under PPS8. The areas in question are within the floodplain and development would not be permissible under PPS15. Should the LLPA become a riverside park then it would be de facto open space anyway and PPS8 would apply. The LLPA will be defined within Zoning LC 07 and we see no reason why it cannot also be designated as open space and recommend accordingly. We agree that the LC 07 designation should include the requirement to provide the riverside park as suggested by the objectors and Department.

There was reference to a pinch point at the northern end of the zoning near a bend of the river. Lisburn City Council were concerned that there would not be sufficient room to provide the riverside park, footpaths and cycleways. There does not appear to be any physical features defining the Department/objectors agreed boundary. The landform consists of a gentle slope up from the river. The Department preferred the Council’s suggestion at the inquiry. The site is large enough to ensure that there is sufficient space between development and the river to provide the necessary leisure facilities. We consider that the Council’s suggested boundary should be followed for this small portion of the northern boundary. Apart from this change we endorse the agreed LLPA boundary as it affects LC 07. We note that boundary now includes all of Carlton House and outbuildings in the LLPA.

There was another issue that Lagan Valley Regional Park should be extended to include this area of open space. This issue is addressed in the Lagan Valley Regional Park volume of our report.

Objection 588 did not refer to the designation of part of their site as open space and an LLPA. Objection 768 overlaps with 588 and did object to the designation of that site as open space and LLPA. We consider that the LLPA and open space designations are justified as amended above. The importance of the Lagan Valley needs to be recognised in this area. The agreed amendment to the LLPA and open space means that part of the site will be included in Zoning LC 07 and can be developed. The remainder of the site is partly within the floodplain and is important to the setting of Lisburn in terms of the River Lagan. We have no further information to assess the objection and whether it is satisfied. The site is within the development limit and outside Lagan Valley Regional Park and therefore the objection on these grounds is without any basis.

Objections 733 and 3117 sought the reduction of the open space designations as it affected their lands. The designations have been reduced and so we consider that they have been at least partly if not fully addressed.
Objection 1856 (RSPB) sought the extension of the open space designation to include the lands between the Blaris Cemetery extension and the River Lagan. These lands are within the LLPA and a SLNCI already. They appear to be within the floodplain and are not being used for agricultural purposes. We consider that this portion of land could be zoned as open space by extension of the adjoining LC 37 open space zoning.

Plan Text and Key Site Requirements (objections 702, 932 and 2022)

We generally prefer the Department’s suggested headnote for the zoning. It will require adjustments in the light of our conclusions on the objections. We consider that it is important to refer to the fact that it is a major employment location. The objectors’ suggested text read more like explanatory text and does not accord with our recommendation in any event. The area of the site was identified as 105 hectares in the Plan. The adjustments to the open space and LLPA zonings will increase the size of Zoning LC 07. The Department should re-calculate the area of the zoning and this should be the figure used in the headnote. We suggest that Map No. 2/002 may no longer be necessary because it illustrated development zones no longer proposed.

We agree that a planning (and transport) masterplan for the site is required in view of its size and the range of proposed employment uses. We note that School and Healthcare facilities were included in the key site requirements in the Plan and consider that their provision can be addressed in this Masterplan. The list of acceptable employment uses is as standard for an employment zoning. Office use has been discussed above and we agree with the Department’s approach. We note that the other suggested uses (Hotel and Car Showrooms) were also included in the key site requirements in the Plan. Transport Assessment is a requirement of regional policy and does not need to be included as a key site requirement. The provision of the M1-Knockmore link is essential to this development and must be provided as part of the development. The specification of other matters would pre-judge the outcome of the assessment process.

The matter of access to Blaris Road can be addressed in the Masterplan. The provision of cycle and pedestrian links and public transport can also be addressed in the Masterplan and Transport Assessment. We note that the Council requested that a pedestrian and cycle link should be provided from Blaris old cemetery to the River Lagan. There seemed to be broad agreement and an indication that it could be facilitated within the proposed layout. We agree with the parties that a linear park should be provided along the river with links to and through the development. The link to Blaris old cemetery could be facilitated as part of this requirement. We consider that this would be a superior route than along the M1-Knockmore link, as suggested by Sustrans (objection 702). The linear park will include cycleways, which will satisfy one of Sustrans other routes along the Lagan. We do not have sufficient information to address their suggested route along the M1. Somewhat confusingly Lisburn City Council objected to the community greenways in this area in a different submission made by a different agent. We shall address this objection under community greenways below in the context of what we have recommended here.

We have explained our general approach to key site requirements above. The Masterplan will address landscaping matters. Lisburn City Council’s amendments to the key site requirements are over-prescriptive and unnecessary. Provision of the linear park and pedestrian and cycle links are covered already and open space is addressed in the Masterplan.
There was broad agreement with the Department’s amplification text. We agree that the references to multi-landowners and to consultation with the Departments of Education and Health are not necessary. The Department may wish to consider reference to the requirements of regional policy in order to assist developers.

**Recommendations**

We recommend that the text in the plan should read as follows:

**Major Employment Location**

**Land at West Lisburn, Blaris**

[X] hectares of land are zoned for employment use at West Lisburn, Blaris as identified on Map 2/001 – Lisburn City

Key site requirements:

- Development of the site shall only be permitted in accordance with an overall Masterplan (incorporating a transport masterplan) to be agreed with the Department.

- The Masterplan shall outline:
  1. the overall design concept, objectives and priorities for the site
  2. a block structure defined by a hierarchy of routes and spaces
  3. appropriate scale, massing and design variety of building blocks
  4. appropriate open space and public realm
  5. appropriate landscaping including boundary planting and around Blaris old cemetery
  6. appropriate public transport, cycleway, footpath and parking provision
  7. the proposed phasing of development

- the following uses will be acceptable on the site: employment uses in Use Classes B1, B2, B3 and B4; Hotel and ancillary leisure facilities; School; Healthcare facilities (Use Class D1 (a); Car Showrooms; open space; small scale retail development to serve local needs. The above Use Classes are as defined in the Planning (Use Classes) Order (Northern Ireland) 2004.

- The total amount of floorspace for Business Use Class B1 (a) (Offices) within the overall Zoning shall not exceed 5,000 m². Consideration may be given to proposals above 5,000 m² where it can be demonstrated that the proposal cannot be accommodated within Belfast or Lisburn city centres and would otherwise result in the loss of significant inward investment.

- The provision of the M1-Knockmore link road. The funding of this road shall be the responsibility of the developers either in full or very substantial part.

- A linear riverside park shall be provided within the area that comprises LLPA LC 21 to include pedestrian and cycle corridors which integrate with the proposed development, Blaris Old Cemetery and the wider River Lagan corridor.

We also recommend that the amplification be amended as discussed above.
Recommendations for LLPA and Open Space – Zonings LC 21 and LC 37

We recommend that the LLPA Zoning LC 21 be defined as discussed above and that this area also be designated as open space under Zoning LC 37. We also recommend that Zoning LC 37 include the area of LLPA LC 21 between Blaris Cemetery extension and the River Lagan.

Zoning LC 09 – Lands at Knockmore Road

Objections 1469 & 1568

These objections were to the impact of industrial development on the setting of Lissue House and the fact that the LLPA (LC 23) would be ineffectual in offering protection to the wider setting of the House. Lissue House is a listed building and the House and its setting are afforded statutory protection by Planning Legislation. We note that the lands are already zoned for industrial development in the Lisburn Area Plan and are zoned as Existing Employment in the Plan. We also note that the key site requirements for the zoning include the provision of a 5-10m wide planting buffer along the boundary with Lissue House. This is the same as the requirement for all other boundaries. In fact it appears to be a case of repetition of the same requirement twice. As Lissue House is raised above Zoning LC 09, development will impact on its setting. We consider that this impact could be reduced by more robust key site requirements. The Masterplan and landscaping plans should address the relationship with Lissue House and provide for a minimum buffer to protect the setting of the listed building. The zoning has been partially developed and we are not aware of the approval of any Masterplans already. We note that the more westerly field of the zoning nearest Lissue House remains undeveloped. In this context we consider that the key site requirements should be amended to reflect our conclusions above. We do not support the deletion of the zoning as may be suggested by the objector. We cannot support the extension of an LLPA onto an adjoining field without landscape merit. This would be contrary to the guidance on designation of LLPAs in PPS6.

Objection 895 related to the key site requirements for the zoning. In particular, the need for a concept masterplan was queried. We have made it clear that a concept plan is necessary in the context of the adjoining listed building and the zoning’s peripheral location. This may cause difficulties for piecemeal development of the site, but proper planning must take priority. The objection also specified the requirements for a transport assessment and Article 40 for management of the landscaping. Transport assessment is a requirement of regional policy and so this key site requirement is not necessary. Management of landscaping can be addressed by conditions and so this requirement is not necessary. The objection referred to all the key site requirements and so we shall comment briefly on the others. The list of acceptable use classes needs to be amended to reflect the Department’s strategic position and the current Use Classes Order. Variety of buildings can be addressed in the concept plan and at the application stage. As stated above we consider that a comprehensive landscaping plan should be submitted at the same time as the Masterplan. This can address planting to boundaries and the retention of vegetation within the site. There is less need for prescriptive landscaping requirements to be specified. For example, the southern boundary of the zoning is defined by an old railway line and the land beyond is also now also proposed for employment uses.
Recommendation

We recommend that the key site requirements for zoning LC 09 are amended as follows:

- The list of acceptable uses to be amended as agreed by the Department in the strategic employment section of our report.
- The requirement for a comprehensive Masterplan shall be expanded to refer to the relationship with Lissue House (listed building), as well as the design concept, objectives and priorities for the site.
- A requirement for a comprehensive landscaping plan to be submitted at the same time as the concept masterplan. This shall indicate the existing trees and hedges on the site and those to be retained, as well as planting proposals for the site. The treatment of the boundary with Lissue House and proposals for substantial buffer planting (of at least 10m in width) shall be specifically addressed.
- Access shall be via the existing access to the industrial estate onto Ballinderry Road.

Zoning LC 10 – Ballynahinch Road (objections 2022/31 & 2022/32)

Lisburn City Council objected to the inclusion of the car park serving Barbour playing fields in this employment zoning. The Department confirmed that as this site has planning permission for residential development, the employment zoning should be deleted. We agree with this approach to this individual site and consider that this addresses the objections.

Recommendation

We recommend that Zoning LC10 is deleted from the plan.

Zoning LC 12 – Enterprise Crescent, Ballinderry Road

Objection 976

This objection sought the zoning of the site for housing, some of which is zoned as part of LC 12 existing employment zoning. It also related to the proposed SLNCI designation for the site (LC 20/03). The site comprises rough pasture with an embankment to the rear. There are factories to the east and a former public house (now demolished) to the west.

The Department (NIEA) confirmed that the only area of real nature conservation interest was the embankment to the north of the site. It was agreed that the site could be zoned for housing subject to key site requirements to safeguard the embankment from development and ensure retention of the trees and hedges along the roadside. The proposed SLNCI designation could then be deleted.

We have no reason to depart from the expert views of NIEA that the SLNCI designation can be deleted. The embankment to the rear of the site is an important feature that should be safeguarded by a key site requirement. We agree that the existing roadside boundary vegetation should be retained. The other vegetation outside the embankment
does not merit retention. A buffer between the site and the adjoining employment uses would be required. A concept statement and transport assessment are requirements of regional policy.

**Recommendation**

That the site is zoned for housing subject to key site requirements to address the following matters:

- No development shall take place on the embankment in the northern part of the site. This area shall be safeguarded and managed in accordance with details to be submitted for the approval of the Department.
- The retention of the trees and hedges along the boundary of the site with Ballinderry Road.
- The provision of a landscaped buffer along the eastern boundary of the site.
- Access from Ballinderry Road.

**Objection 2905**

This objection to the employment zoning sought a zoning for housing. It also related to the SLNCI designation on the site (LC 20/02). We fail to see the logic of the SLNCI designation in the draft plan. It covered parts of housing zoning LC 04/09, which is built and occupied, and the remainder is within an employment zoning. A business park has been built and occupied on the land north of the objection site. The Department accepted that these areas could not be part of the SLNCI and tabled an amended plan to the inquiry. This is the plan on which we must base our assessment rather than other post-hearing correspondence that contradicted its provisions. It then emerged that there was an extant planning permission on the objection site for employment uses. The Department accepted that this would eliminate the nature conservation interest of the site. It was finally agreed that if the employment planning permission lapsed then it would be better if the site were zoned for housing. The most important part of the site could be protected by key site requirements and on this basis the SLNCI could be deleted.

The site has received planning permission for residential development since the inquiry. We consider that a housing zoning on this site would be appropriate. The planning permission for employment use has now lapsed and so the parties were agreeable to this approach. The adjoining land uses are compatible with residential development. The business park contains light industrial or business units. The vehicle test centre is surrounded by mature vegetation and is compatible with residential land use. We agree that a key site requirement to protect the wetland area in the corner of the site is appropriate. We do not agree that landscaping requirements need to be specified and can be left to the development management process. The business park includes planting to the boundaries and as stated the test centre has existing mature boundaries. A concept statement and transport assessment are requirements of regional policy. The specified improvements are pre-judging the outcome of the assessment. There may be scope for access from the adjoining housing zoning rather than Ballinderry Road. Flooding is an issue addressed by Planning Policy Statement 15.
**Recommendation**

That the site is zoned for housing subject to key site requirements to address the following matters:

- No development shall take place on the south eastern corner of the site as indicated on Plan 3. This area shall be safeguarded and managed in accordance with details to be submitted for the approval of the Department.

**RETAILING**

**Designation LC 16 – Sprucefield Regional Shopping Centre**

**Key site requirements (objections 848 and 968)**

The policy context for and principle of Sprucefield RSC were discussed in the strategic section of our report. There were several objections to the key site requirements for the designation. The Department clarified that the first key site requirement relating to masterplans should only apply to the development potential area as shown on the plan maps. No revised wording was suggested. The replacement of “site” in line one with “area of development potential” would appear to address the matter and the concerns raised by the objections.

The second key site requirement “build heights shall minimise the visual impact on the local landscape” appears to be virtually meaningless. The objector referred to the need for flexibility. We consider that the issue of height would be addressed in the consideration of a planning application and question the assistance that this key site requirement would provide to that process. We recommend that it is deleted.

Objection 848 did object to the key site requirements overall without further detailed analysis. We would comment that key site requirements three and four are covered by regional policy. Key site requirement five refers to the provisions of environmental impact assessment legislation which clearly does not need to be incorporated in the plan in this way.

We note that objection 848 referred to a holding objection to the additional allocated lands i.e. the development potential indicated on Map 2/003. This element has been withdrawn. We assume that the reference to primacy of the RSC core has also been withdrawn.

Objection 1446/8 objected to the proposed extension of retail facilities at Sprucefield. No further information was provided to explain the substance or basis for this objection and in this critical absence we cannot evaluate the objection.
OBJECTIONS TO THE EXCLUSION OF SITES FROM LC 16

Police Training Centre, Ravernet Road  
(Objections 862/5, 2545/4, 2666/2, 3052/6, 3188, 3236/6, 3515/3 and 4274)

Most of these objections requested that the boundary of LC16 be extended to include the site of the PSNI training centre and vehicle impound lot. This site is separated from Sprucefield retail development by the Ravernet River and has a completely different access. We note that the river and its banks are a proposed SLNCI and LLPA. There are no objections to these designations. We consider that the degree of separation and the environmental designations mean that the objections should fail. We were not presented with any evidence to justify the objections and make a special case or overriding need for the proposal.

Objection 2666 on behalf of PSNI sought that the site should be brought within the development limit as whiteland. It was made clear that the PSNI has no intention to vacate the site and has applied to extend the buildings on the site. The site contains many buildings including a two and a half storey main building and presents a built-up appearance, reinforced by the security fencing around the site. There is good boundary vegetation along the suggested development limit. We note that there were no objections on access, drainage or nature conservation grounds. We agree with the Department that the river is a logical and defensible limit. However, the site presents a very built-up appearance from Ravernet Road, which justifies its inclusion within the settlement limit. The resultant settlement limit would be well defined by the landform and boundary vegetation as described above.

It was unclear if this was also the site referred to in several objections as suitable for designation as a DOS. If it is the site in question then we consider that it is not suitable because it is in beneficial use and occupies an edge of settlement location on a rural road.

**Recommendation**

We recommend that the site is included within the settlement limit.

Site between Sprucefield and Ravernet Road (Objection 3184)

This objection was somewhat predicated on Proposal PA03 being completed in the course of the plan period. This would provide a definite boundary for the site. We heard evidence that the proposed M1 – A1 link is not in any road building programme up to 2018. We will also recommend below that proposal PA 03 is deleted from the plan. In these circumstances, we cannot give this road line any weight and shall assess the objection on the basis of the existing situation.

The site is poorly related to Sprucefield and we acknowledge that there may be constraints to developing the site for retail purposes in terms of the topography of the site relative to the existing Sprucefield buildings. There is limited connection between the site and Sprucefield and this is reliant on the cooperation of Marks and Spencer. We have concluded above that the adjoining PSNI site should not be included within designation LC 16 and so the site cannot link through this area. We have also heard that the PSNI have no plans to vacate their premises. The availability of the area of
development potential was also queried. We consider that even if the transmitter mast site does not become available, there remains adequate land to meet the future needs of Sprucefield without recourse to the objection site. We note that the former Prentice garage site has recently received planning permission for retail warehouses. We do not construe the objection as relating to the lands within designation LC 16. Rather the case related to their availability for development.

Inclusion of the site would breach the strong defensible boundary of the Ravernet River and associated vegetation. We agree with the Department that the urban form arguments weigh against this site. The objection also sought a housing zoning as an alternative. We consider that there is no justification for a housing zoning on the site. It would be physically separate from Lisburn City or any existing housing area. A regional shopping centre would not justify housing on this site. The boundary and urban form arguments would also apply to a housing zoning on the site. Development of parts of the site would be elevated and prominent. For these reasons we recommend no change to the Plan in respect of this objection.

Land North of Eglantine Road (Objection 936)

The land was included in the site that obtained outline planning permission for the Sainsbury’s/ B & Q, etc. development. Since then the M1-A1 link has been built as part of that scheme and severs the site from Sprucefield proper. We accept that the land was within the outline planning permission area. However, it does not appear to have been included in any subsequent reserved matters or full application. It was shown as landscaping on the illustrative layout that accompanied the Commission’s report into the outline application. Nothing has been constructed on the site and nature has restored the site to greenery following its use as a compound associated with the road and other development. The site has now become severed from the built development by the new road. We do not therefore find this planning history to be determining in a development plan context.

The purpose of the development plan designation is to set logical boundaries for Sprucefield. The amplification sets out what those boundaries are and the M1-A1 link is quoted as one boundary. We can see the sense in this. A dual-carriageway is a substantial and definite stop on this side of the A1. We consider that it is a better defined boundary than Eglantine Road, notwithstanding the presence of mature trees. The new road is not shown on the plan Maps and this could account for a mapping error as argued by the Department. We consider that this supports our earlier recommendation that up-to-date maps should be used. The inclusion of a small piece of land adjoining the site and south of the new road is presumably also an error. The text states that the boundary should be the road and we support this. We were not presented with any evidence of significant highway safety benefits associated with the inclusion of the site. The alleged benefits of the illustrative access scheme do not outweigh our overall conclusion.

Recommendation

We recommend that the M1-A1 link road as constructed be indicated on the Plan Maps and that the boundary of LC 16 should follow the road line.
OBJECTION SEEKING AN ADDITIONAL DISTRICT CENTRE

Lands at Moira Road (objection 3285)

The site contains a Lidl store, a play centre and two retail units in a single building. No evidence or information was supplied to support the objection. We do not consider that this level or range of uses accords with the description of District Centres in PPS5 and that the site should not be designated as a District Centre in the Plan.

TRANSPORTATION

STRATEGIC ROAD SCHEMES

Proposal PA03 – M1 between Black’s Road and Sprucefield

This is a strategic road scheme introduced in Plan Amendment No. 1. It consists of widening of the M1 between Black’s Road and Sprucefield and a new link road between the M1 and the A1 to the east of Sprucefield. The objections received were to this latter element – the link road. The proposal is not referred to in the RTS and the link road is not included in the Regional Strategic Network Transport Plan. The scheme to widen the M1 is referred to in BMTP at paragraph 6.20. This reference is in the context of a possible future scheme to be implemented outside the plan period (i.e. after 2015). It states that developments at the Maze and Sprucefield may mean that the scheme to be implemented earlier. There is no reference to a new link road; BMTP merely refers to improving the connection between the M1 and the A1. After a local transportation study of the Sprucefield area, the Department added this protection line because it would be an improvement to the strategic eastern seaboard corridor. It would separate the strategic traffic from that in the vicinity of the Sprucefield junction. Paragraph 70 of PPS13 requires development plans to protect land necessary for the implementation of transport schemes. This will include the protection of routes for transport infrastructure beyond the development plan period where these are of strategic importance. Policy for the protection of identified routes is contained in Policy AMP4 of PPS3.

The objectors argued that alternative routes for the proposed link road had not been considered. The consultants for objection 4256 indicated that a new link road could be provided from a possible new motorway junction to serve the Maze (Strategic Investment Proposal) running southwards to join the A1 approximately 3 Km south-west of the southern edge of Hillsborough. The benefits of this suggested scheme in terms of cost, convenience (particularly for travelling west on the M1) and highway safety were explained. The Roads Service proposal would not address congestion at the Hillsborough roundabout or the inadequacy of the dual carriageway and crossings on the A1 around the town. A separate scheme would be required to take through traffic over the roundabout. This will add to the cost of the Department’s proposals. Another factor is the junction south of Hillsborough, which will also have to be improved. The Department’s response was that the proposed link road closely followed the existing road and minimised lengthy routes through the countryside and disturbance to the Green Belt. Any alternatives would have to be considered but as long as this was the preferred route then it should be included in the development plan. We note that the improvements to the Hillsborough south junction to create a grade separated junction have been completed. We cannot comment on any particular suggested alternatives.
We consider that matters such as the effects on individual properties, blight, severance of land, environmental impacts, access issues, landscaping of the proposed motorway, public consultation and local authority/public involvement in the decision-making process etc. are all capable of being addressed through the statutory procedures for approval of road schemes and we are unable to comment further on them. The matter of funding for the scheme was clarified by the Department i.e. this is a strategic road funded by the Government. We note Lisburn City Council’s objection to the accuracy of the maps of the area as contained in BMAP. We note that they were the most up-to-date at the time. There should be more accurate maps now available that show the new road layout at Sprucefield. These should be used in the final version of BMAP.

The Proposal includes widening of the M1 between Blacks Road and Sprucefield. There is no land take shown for this element of the Proposal on the accompanying plans. Indeed much of the widening is not indicated at all on the plans, presumably as the works can be accommodated within the existing motorway boundary. Whilst there were no objections to this element of the Proposal, it cannot be disaggregated from the other elements. Given our comments above we would query the necessity to include any of this Proposal within the Plan and recommend accordingly.

**Recommendation**

We recommend that Proposal PA 03 is deleted from the plan and maps.
Proposal PA04 – Blacks Road Link

The only objection to this proposal was from the Forest of Belfast whose concerns related to assurances that the proposal would be subject to an environmental impact assessment and that alternatives would be considered as part of the BMAP or a future public inquiry. Environmental impact assessment is part of the normal procedures for considering roads schemes and whether a public inquiry is held is a matter for the Department. We can make no further comment on this objection.

Non-Strategic Road Schemes

Proposal LC17 in General

There were general objections (2760/33 & 4245 – DPP for Tesco) that there should be clear guidance as to which developers would be required to contribute to both these road proposals, including a detailed breakdown on costs attributable to each site. There was a request that the proposals be reviewed to determine if the delivery mechanisms are in place to achieve completion of the roads. Our general response on this issue has been addressed in Part 1 of our report (at Chapter 5). The Department clarified which zonings would be required to contribute to these road proposals. The need for the development to contribute to these road proposals is also set out in the key site requirements for the relevant zonings. We consider that there is no need for any additional text. The suggestion that the costs per zoning be set out is impractical. Figures can only be derived after detailed analysis and are not appropriate in a development plan context. Both the BMTP and BMAP are subject to review mechanisms. We recommend no change to the plan as a result of these objections.

LC17/01 M1-Knockmore Link

There were no objections to the proposal in principle. The only outstanding matter was the precise alignment of the route. The objectors pointed out that a detailed alignment had been worked up as part of the planning application for development of the site. This differed slightly from the road protection corridor shown in Plan Amendment No. 1. A plan was submitted showing the detailed scheme. The Department indicated that there was no concern and that the line could be amended for the final plan. We therefore recommend accordingly. We also agree with the objector that the maps should be updated to reflect the new layout of the M1 junction to which the southern end of the proposed link road will connect.

Recommendation

We recommend that the line of the proposed road as agreed is indicated in the adopted plan, including the connection to the M1 junction.
LC17/02 North Lisburn Feeder Road

This road is shown running along the north of Lisburn City from Belsize Road in the east, along Deriaghy Road, to Pond Park Road to the west. A northern spur through zoning LC04/14 to link with Pond Park Road south of Boomer’s Corner is also included. The line and extent of this northern spur was amended in Plan Amendment No. 1. The evidence was that the road has been substantially delivered through developer contributions and that the remaining section was in the process of being finalised. There was only one objection to the principle of the road, which again raised the matter of developer funding. This type of objection has already been addressed. The remaining objections were concerned with the extent of the northern spur and basically stating that it did not go far enough. A case was made on the basis of highway safety issues related to Boomer’s Corner. The Lisburn Area Plan had indicated a scheme to by-pass this dangerous corner. The Department indicated that it did not extend so far because a planning application for development on LC04/14 had been approved. The developers had indicated that they could only construct a road as indicated. The Department accepted that proposal as the best achievable without encroachment into an area of high scenic value and bearing in mind the developers contribution to public infrastructure.

The scheme as shown in its final form in Plan Amendment no. 1, extends beyond zoning LC04/14 as far as the junction of the Old Park Road. There is an indicative line shown on Map 2 – Lisburn Urban Area of the adopted Lisburn Area Plan. This is shown as a road proposal (subject to further study). This can only mean that the final line and extent of the road had not been decided. As such it cannot tie this plan to that indicative line. We accept that the road line through the housing zoning is necessary and appropriate. However, there must be a limit as to how far outside a development site and into the countryside a developer will be required to fund a road. It could be the case that there are highway safety issues at Boomer’s Corner. We were not given any accident statistics to assess this matter, only anecdote and assertion. Even if there is a problem, we consider that it is the role of the highway authority to address it because the traffic at that point would not be associated with the development site. The precise alignment of the road beyond the settlement limit is a matter for the Department.

Objection 4273 referred to this scheme (we infer from the references to maps in the objection). No evidence was presented to enable us to evaluate the bald statements in the objection related to the road scheme and consequent loss of land in Zoning LC 04/14.

The issue of grass cutting at junctions is a matter for Roads Service outwith the scope of an Area Plan. Counter-objection 175 was made to objection 3266 and argued that additional lands should be allocated in the area in order to facilitate the construction of the original road as shown in Lisburn Area Plan. Objection 3266 was to the key site requirements for zoning LC04/14 and to the road proposal and specifically that developers would be responsible for the funding of the road. As discussed above, the Department conceded that the key site requirements for this zoning were no longer required and we recommend accordingly. We do not consider that zoning of additional land can be described as a counter argument to this objection. This suggestion has not been publicised and there is no opportunity for those opposed to such a zoning to object. Even if this counter-objection was considered we do not agree with the suggestion for the reasons given above. Whether or not there will be additional HGV traffic using the White Mountain Road as a result of the plan’s proposals is a matter of
conjecture and not capable of analysis in the context of the road being part of the public highway network, not subject to any weight restriction. Any future weight restriction would be a matter for Roads Service to decide. We recommend no change to the Plan as a result of this objection.

PROPOSAL LC 18 – RAIL HALT, WEST LISBURN
PROPOSAL LC 19 – PARK AND RIDE, WEST LISBURN
(Objections 1947, 2022/38 & 39, 3787, 3790, 3793)

These proposals are inextricably linked and cannot be considered independently of each other. Planning permission was granted for residential development on the non-operational land of LC 18 and the majority of LC 19 in 2004. We are surprised that this fact was not taken into account in the draft plan proposals. The dwellings have now been constructed on the site of the park and ride. The Department confirmed to the inquiry that both proposals should be removed from the plan completely. We agree with this approach. Lisburn City Council were very supportive of the principle of a rail halt and park and ride in this general area, as were the other objectors. The Department considered that an alternative location could be pursued through a planning application or as a modification to the plan. The Department should pursue an alternative as a matter of urgency given the importance of these proposals.

In terms of alternatives before us or presented to us, objection 3787 (MBA) suggested the LIFHE campus as an alternative site. The LIFHE objection 1947 contained a communication from MBA that their objection was no longer being pursued. We are also aware that planning permission has been granted for residential development of the site in 2008. We therefore consider that the objection must fail. Objection 3790 (MBA) identified a site to the west of Knockmore Road around the junction of the main rail line and the Antrim branch line. The objection states that the park and ride proposal should be transferred to this site. No supporting information was supplied to explain how this proposal could be achieved in practical terms. The site is not of sufficient size to accommodate a park and ride site. It would not be linked to a proposed rail halt and would therefore be impractical. The location is surrounded by existing employment uses (including the Coca-Cola plant) and it is difficult to see how access could be achieved to the public road network. Lisburn City Council suggested an alternative location in their submissions. Unfortunately this was not in the original objection and so cannot be considered by us in this report. We would note that the site is within an area of additional employment land that we have recommended for inclusion in our report. This may assist the Department for Regional Development in their search for an alternative site. We appreciate that this site would not serve the branch line. However, in the absence of any proposals to reopen this line, this does not appear to be a determining issue. We make no comment on the relationship of these proposals to the development of the Maze site, which is a separate matter not before us.

Objection 3793 identified the park and ride site and adjoining former factory premises. Deletion of the park and ride proposal and identification of the site as a development opportunity site (residential/retail) was sought. The park and ride site is to be deleted from the Plan. The site benefits from planning permission for residential development, which is underway. There is no justification for the suggested amendment to the plan.
Recommendation

We recommend that Proposals LC 18 and LC 19 are deleted from the plan and the Department pursues an alternative location as a matter of urgency given the importance of these proposals. Explanatory text to address the need to provide a new rail halt and park and ride in this general area should be incorporated by the Department.

URBAN ENVIRONMENT

AREAS OF TOWNSCAPE CHARACTER (ATC)/ HISTORIC PARKS

Objection to all ATC designations in Lisburn Designations LC 31 to LC 35 (Objection 3791)

This objection contained no explanation as to why the designations were not justified in whole or in part. No information as to what parts were not worthy was provided. We therefore have no basis for consideration of the objection and cannot recommend any changes to the plan as a result.

LC 34 Wallace Park ATC
(Objection 1121)

The Friends of Wallace Park requested that this ATC be designated a Conservation Area. The designation of Conservation Areas is not part of the development plan process and so we cannot comment further. This is a matter for further consideration by the Department.

LC 36 Historic Park, Wallace Park
(Objection 1121)

The Friends of Wallace Park highlighted some factual errors in the amplification text accompanying this designation. We recommend that the Department provides an up-to-date and accurate description of the Park in the Plan.

OPEN SPACE

PROPOSAL LC 38 – LANDS AT MAGHERALAVE ROAD

Objection 2959

The objection stated that the proposed open space and LLPA designation LC 29 were not justified on a large site identified in the objection. No information or evidence was provided to justify this assertion. We note the Department’s confirmation that the open space was zoned to meet the needs of the area after consultation with the Council as statutory provider of open space. We have considered the Department’s evidence as to the landscape and archaeological features of the site that support its designation as an LLPA and agree with their conclusions. We therefore recommend no change to the plan proposals as a result of this objection. Further detailed objections are considered below.
Objection to exclusion of land from LC 38 and LLPA LC 29 (2022/62 & 63)

This objection relates to a strip of embankment between the above proposals and a new housing development on Duncan's Road. We agree with the parties that the site is a valuable area of woodland and potential wildlife and open space link in this important area. The Council is the statutory provider of open space in the area. We agree that the site should be included in both the above zonings as suggested by the parties.

Recommendation

We recommend that the site be included within LLPA zoning LC 29 – Stockdam/Belsize and open space zoning LC 38.

Objections 400 and 3227

These objections relate to a small site north of Brookfield seeking that the site be zoned for housing. We note that a small site to the north near the NLFR was withdrawn by the objector at the inquiry (objection 400 refers). The objection was supported by Lisburn City Council. The background was that adjoining land (extending to approximately 6 hectares) was transferred to the Council for open space. The site was not required as open space and in return for the transfer of the larger site the Council and the Department were content for the objection lands to be zoned for housing. The Department had no landscape or nature conservation objection subject to retention of the trees along the southern boundary of the site.

We consider that the loss of this relatively small part of the overall open space in the area is acceptable in the context of securing the larger site as part of the linear park. We consider that key site requirements for a small zoning such as this should be minimal. There is a need for a 6m wide access along the southern boundary of the site in order to link with the open space across the road. We consider that all other matters could be addressed in a concept plan and as part of the development management process. There are also errors in the Department’s suggested requirements. For example, there are no open watercourses on the site.

Objection 3227 appears to relate to the same area of land as no. 400. For the sake of clarity our recommendation relates to objection 400 should there be any differences between them. The reason for this is that objection 400 was pursued and 3227 was not.

Recommendation

We recommend that the site be zoned for housing subject to key site requirements to address the following matters:

- A Masterplan to be submitted for approval, which should address the relationship with the adjoining housing zonings and the provision of a landscape buffer along the western and northern boundaries of the site to separate housing from the adjoining open space.
- The provision of a 6m wide easement along the southern boundary of the site as a link to the remainder of LC 38 to the east.

Objection 3087
This objection identified lands within proposal LC 38, including part of objection 400. It related to the exclusion of the site from the settlement limit and its inclusion in the Green Belt. The site is within the settlement limit and not in the Green Belt. There is therefore no basis to this objection. We consider that only the lands within objection 400 should be zoned for housing. The remainder of proposal LC 38 is justified and an important zoning in the context of this part of Lisburn.

**DESIGNATION LC 39 – COMMUNITY GREENWAYS LISBURN CITY**

The only objections to the proposed Community Greenways were from Lisburn City Council. The format of the Council’s objection did not assist us in our consideration of them. There were often two objections in different volumes by two different agents relating to the same designation or proposal. This led to considerable confusion and administrative work in resolving the nature of their concerns.

**LC 39/01 – Duncan’s Park to Belfast Hills (objection 2022/59)**

The Council’s suggested link between two Community Greenways was acceptable to the Department. The route shown is on street and we cannot see any reason to disagree with the parties.

**Recommendation**

That the link between Community Greenways LC 39/01 and LC 39/02 as indicated on Lisburn City Council Map 101 be adopted in the Plan.

**LC 39/02 – Friends School to River Lagan (objection 2022/80)**

We have already recommended that a Community Greenway be provided along the Lagan as part of the linear park associated with designation LC 07 Blaris (as well as a link to Blaris old cemetery). This takes the Community Greenway as far as the proposed M1-Knockmore link, which is only a short distance from Greer’s Bridge. We consider that this is sufficient as the purpose of Community Greenways is to create links within the urban areas. The Council’s aspirations for further potential links beyond into the countryside can be pursued outwith the plan process. The Departmental statements did not address the issue of extension of the routes at all.

**LC 39/03 – Friends School to Millbrook to LVRP (objection 2022/58)**

Again we were not assisted by the Departmental statements because they did not address the issue of alternative routes, which was the objection in this case. The statement does not explain why the plan shows a route through the city centre and Hilden. This route is not linking significant areas of open space, particularly in Hilden where it appears to be mostly on-street. The only area of open space that the disputed section traverses is Castle Gardens. The Council’s alternative route for LC 39/03 does appear to replicate LC 39/04 for significant stretches in the Millbrook area and deletes the Hilden portion of the greenway. The Council’s alternative route for LC 39/04 reinstates the plan route for LC 39/03 from Friend’s School to Castle Gardens. What we are left with if the Council’s suggestions are followed is an extra Community
Greenway through Wallace Park down to Millbrook, the deletion of the route through Hilden and greenways on both sides of the Lagan at Millbrook. The Lagan towpath is on the southern side and is of good quality. The footpaths on the northern side are poorer quality and would need to be upgraded to serve as a greenway.

We consider that the route through Hilden does not offend what Lisburn City Council is seeking to achieve. The extra portion through Wallace Park is of benefit. We see no need for a greenway on both sides of the Lagan at Millbrook. This would not impede any Council plans to improve the route. We agree that the last two circles on LC 39/04 east of the river appear to be superfluous.

**Recommendation**

We recommend that the additional greenway through Wallace Park to Millbrook is included in the plan as part of LC 39/03. LC 39/04 should follow one side of the River Lagan through Millbrook and the two most easterly circles should be deleted from the plan.
LISBURN CITY CENTRE

DESIGNATION LC 44 – LISBURN CITY CENTRE BOUNDARY

In this section we will consider all objections related to the extent of the city centre and related objections.

Objections to the inclusion of lands in the city centre

Lands around the Cinema and Leisure Centre (objections 2022 and 1750)

We acknowledge that leisure uses are promoted as appropriate uses within town centres in PPS5: Retailing and Town Centres. However, this does not mean that all leisure uses must be included in town centres. There must be recognition of other factors such as the location, form and physical boundaries of the resultant centre. We consider that the objectors have a legitimate concern regarding the possible effects on the vitality and viability of the city centre were the site to be re-developed for retail uses. Although we were presented with no evidence of any intention to re-develop the buildings on the site, there are extensive car parks and open land included within this area. We fail to see the logic of artificially extending the city centre to include a leisure centre and extensive car park. The cinema and nearby restaurants, amusements and video store when added to the leisure centre represent a large site, whose re-development for retailing would accord with regional policy if included in the city centre and could have a significant detrimental effect on the existing main city centre.

Another important consideration is the maintenance of a compact city centre. As we have stated elsewhere, the city centre boundary must be drawn tightly enough to focus investment and ensure that the city centre is sufficiently compact to encourage sustainable transport and provide convenience for shoppers. There is a balance between ensuring that the city centre is large enough to provide sufficient land to meet retail and other needs and ensuring a compact vital and vibrant city centre.

We consider that the inclusion of the retail units at Young Street provides for sufficient expansion of the city centre. There are no objections to this proposal in principle and therefore it must remain in the plan. The additional justification for this expansion is stated to include the river in the city centre. The Department appears to have blindly followed the recommendations of the retail study. The main justification for the expanded areas in the study of linking the traditional city centre to the river does not apply to this site. There is no quantitative analysis to suggest that both extensions are necessary. In fact the retail study concludes that there is no quantitative need for additional floorspace that could not be met in the previously defined city centre. However, there is no objection to the “Young Street/The Island” extension.

We consider that the site is an artificial extension of the city centre unrelated to the main body of the city centre proper. It breaches Governor’s Road, which is a well-defined boundary and represents a significant barrier for pedestrian access. It has a poor elongated form and provides poor boundaries for the city centre that would not be defensible in the long term. All these factors indicate that the objections should succeed and the lands south-west of Governor’s Road should be excluded from the city centre.
Recommendation

We recommend that designation LC 44 be amended to exclude the objection site from the city centre.

Objections to the exclusion of lands from the city centre

Tesco Store, Bentrim Road (2760/34 – Tesco)
Housing Zoning LC 03/10 – Prince William Road (2760/32)

The objection site consists of the Tesco store, car park and petrol filling station along with the parade of restaurants/shops opposite, areas of housing, a public car park, a Roads Service depot, government offices, a fire station and a housing zoning in the plan.

The objector referred to the criteria or factors used by the Department, Colliers and the Commission in order to define the town centre boundary for Craigavon. We note their assessment of the identified factors. The Commissioners in the Craigavon retail report made it clear that the most important factors were to generally focus all existing and planned commercial and civic investment within a relatively tightly drawn area and to reflect any existing natural or physical barriers where possible. We agree that defensible boundaries, the mix of uses, opportunities for investment, etc. are also important considerations. However, we feel that the starting point must be drawing a city centre boundary that is tight enough to focus investment and ensure that the city centre is sufficiently compact to encourage sustainable transport and provide convenience for shoppers. As we have discussed above, there is a balance between ensuring that the city centre is large enough to provide sufficient land to meet retail and other needs and ensuring a compact vital and vibrant city centre.

Each case must be treated on its own merits related to the circumstances of the town or city in question. We consider that Lisburn city centre benefits from excellent boundary definition by major infrastructure features. There would have to be good reasons to breach those boundaries. The city centre has been expanded outside those boundaries in the plan. The Department explained that this was to include leisure uses and the River Lagan in the city centre. We have recommended that the cinema and leisure centre be excluded from the city centre. There are no objections to the other expansion at Young Street. We do not consider that the inclusion of these areas automatically justifies any other proposed extensions.

The vast majority of the site is on the opposite side of the railway line from the city centre. Thiepval Road also separates large parts of the site from the city centre. We consider that these features are very strong defensible boundaries. We do not agree that because Tesco is the only convenience store (which is incorrect) it should be included in the city centre. PPS5 recognises that foodstores cannot readily be accommodated in town centres and so allows for edge of centre sites to be approved. We do not consider that the other uses on the site justify its inclusion. We have not considered the absence of a major food superstore in Belfast city centre to be of any consequence, as discussed in the strategic retail chapter of our report. The site is a reasonable distance from the city centre across major roads. The fact that there is no pedestrian entrance to Bow Street Mall from the Thiepval Road (save through a multi-storey car park) increases the distance pedestrians would have to travel. We therefore
consider that a separate car journey would be the realistic option for shoppers. The objector has misunderstood accessibility. In the context of defining town or city centres, accessibility means easy access to other parts of the city centre. It is usually implicit that central locations will be accessible by car, train, bus etc. The Commissioners in the Craigavon retail report made it clear that the crucial factor was ease of access on foot to and from other parts of the town centre and not access to central locations in general.

The inclusion of this large site within the city centre would allow unfettered retailing and could undermine the vitality and viability of the remainder of the centre. We are conscious of the need to provide for the expansion of retailing within the city centre. We consider that the city centre as defined in the plan (subject to our recommendations) provides sufficient opportunities for city centre investment.

The only objection to the Housing Zoning LC 03/10 was related to the city centre objection. The objection to include these lands in the city centre does not have our support and therefore the basis for the objection has no relevance. We consider that there should be no change to the Plan as a result of the objections.

Lands at Longstone Street (objections 44 and 3773)

This site is separated from the city centre by Thiepval Road. Its inclusion would breach this defensible boundary and would introduce a much weaker boundary in its place. We see no need to include the site. Many of the arguments against the above site apply to the present case as well. We note that the development in objection 44 has taken place despite its location outside the city centre. This negates that objectors’ main argument. No other evidence was advanced to support the inclusion of the site. We consider that there should be no change to the Plan as a result of the objections.

Land South of Governor’s Road (objection 154)

The site contains two large retail units. We have addressed the cinema/leisure centre site above and concluded that it should be excluded from the city centre. The site cannot therefore be included with the cinema lands. The site would breach the boundary provided by the well-defined Governor’s Road and would not lead to a compact and vibrant city centre. The considerations that influenced our assessment of the Tesco objection equally apply to this site, albeit on a smaller scale. The objection is separated from Zoning LC 53 by a large area of housing. We consider that the site would not relate well to that part of the city centre either. We recommend that there should be no change to the Plan as a result of the objections.

Objection 3344/3

This objection to the city centre boundaries was unsubstantiated by any evidence. In the absence of any information or basis on which to consider the matter, we can make no comment on the objection.

Designation LC 45 – Lisburn Primary Retail Core (objection 2022/16)

This objection suggested a modest addition of several properties on Chapel Hill south of Bow Street Mall to the Primary Retail Core. The Department considered that the inclusion of the site would rationalise the boundary and that the plan should be
amended in line with the objection. We consider that the site is in a prime location and that the addition of these properties represents a logical rounding off of the Primary Retail Core.

Recommendation

We recommend that the objection site is included within Designation LC 45 – Lisburn Primary Retail Core.

Designation LC 46 – Primary Retail Frontage, Lisburn (objection 2022/17)

This objection suggested a modest addition to the Primary Retail Frontage to include a block of properties on the southern side of Chapel Hill opposite Bow Street Mall. The Department considered this to be an acceptable amendment. In the light of our conclusions in our strategic retail chapter, we see no reason to disagree with the parties.

Recommendation

We recommend that the objection site is included within Designation LC 46 – Primary Retail Frontage, Lisburn.

DEVELOPMENT OPPORTUNITY SITES (DOS)

Objection to the omission of Development Opportunity Sites from the plan (objections 1750 and 754)

This objection referred to the Lisburn Strategic Investment document produced by the objectors and argued that all the sites identified in that document should have been zoned as DOS in the plan. We do not agree that every car park in the city centre should be zoned as DOS. Elsewhere in their submission Lisburn City Centre Management express the concern that there should be no further erosion of car parking facilities. Some of the larger car parks have been included as DOS in the plan. To designate all the remaining car parks would seem to run counter to this other concern of the objectors. We have made it clear strategically that the mere zoning of DOS will do little and the absence of a specific use seems to have little purpose. City centre sites should be the focus for retail, leisure and office developments. The attached document suggests no uses for the sites other than a general preference for a mix of town centre uses. The absence of any suggested use would not accord with our strategic recommendations under Policy SETT 5 in Part 1 of this report.

The major sites identified in the objection have actually already been designated in the Plan. We offer brief comments on the other suggested sites, which we have numbered on the attached map for convenience:

Site 1 is a long-stay free car park remote from the city centre. We have recommended that it should remain outside the city centre (objection 2760/34 above). We would not support its zoning as a DOS.

Site 2 has been developed and contains an extension to Bow Street Mall.
Site 3 is a car park serving the Mall.  
Site 4 appears to be a service yard/operational area associated with the Mall.  
Site 5 is a small site containing an established store.  
Site 6 has been developed and contains a new retail unit.  
Site 7 is backland private car parking associated with the adjoining businesses. Access and the relationship with the buildings in front would represent significant constraints.  
Sites 8 and 9 are small parcels of land next to the rail line and are of limited value.  
Site 10 has been largely developed as new offices.  
Site 11 contains a major new office/retail development. The failure to zone it as a DOS has not inhibited its development.  
Site 12 is a modern carpet store outside the city centre boundary. We would not support its zoning as a DOS.  
Sites 13 – 16 are public car parks. Sites 13 and 16 are small scale. Sites 14 and 15 are within a LLPA that has not been the subject of any objection in principle. The planting along the road is listed as a feature of interest for the LLPA.

In conclusion we agree with the Department’s designations in the plan and consider that the suggested DOS should not be included in the plan. We can see no reason why they would be difficult to progress through the planning system, given their central location.

The objectors made a separate submission related to their identified Smithfield Square Site in terms of the omission of the surface car park immediately to the east of Lisburn Square. We note that virtually all of the surrounding land has been included in DOS and much of it has been recently re-developed to a high standard (e.g. Lisburn Square). In the absence of any further information, we consider that this is sufficient for this part of the city centre. We consider that the plan need not be changed in response to this objection.

Lands at Antrim Road/Bentrim Road (objections 2885 & 2889)

These objections relates to land at and around the Tesco store on Bentrim Road. We do not consider that a District Centre would be appropriate on an edge of town centre location such as this. No evidence was provided to convince us otherwise. We do not support designation of part of the site as a DOS for retailing because it is already in use as a modern Tesco store and other retail units and uses. No evidence of any exceptional circumstances to justify the objection was presented.

Zoning LC 52 – DOS, Riverside Centre, Young Street (objections 2022/79, 3517 & 1348/5)

The original objection by Lisburn City Council related to the key site requirements and referred to the failure to identify the important issue of the relationship with the River Lagan and the omission of the need for a masterplan for the site. We consider that the additional matters included in the statement of case such as delivering a positive relationship with the river and the provision of a footbridge go beyond the scope of the objection. We are therefore unable to consider them. The Department agreed that a key site requirement related to the submission of a concept statement should be added to the list. We consider that a sentence stating that the submitted concept statement shall address the relationship of the development with the River Lagan would fully address the objection.
Objection 3517 sought the deletion of all the key site requirements for the zoning. We consider that the first two requirements related to floodplains and the last related to transport assessment are matters addressed by regional policy in PPS3, PPS13 and PPS15. These requirements should be deleted. The fact that part of the site is within the floodplain can be included in the amplification text for information. The site has only a small frontage to Sloan Street and the existing accesses are onto Young Street. It seems unnecessary to stipulate the access. It can be addressed in the concept plan and transport assessment.

The South Eastern Education and Library Board comments regarding the need for new development to be compatible with the Nursery School (within the DOS) are matters that should be addressed in the concept plan and at the development management stage as material considerations in the determination of planning applications.

**Recommendation**

We recommend that all the key site requirements for Zoning LC 52 are deleted and replaced by the following requirement:

- A concept statement to facilitate the comprehensive development of the site shall be submitted to and agreed with the Department. The submitted concept statement shall address the relationship of the development with the River Lagan.

**Zoning LC 53 – see Lagan Valley Regional Park Volume**

**Zoning LC 56 – DOS, Land between Castle Street and Wallace Avenue (objection 1950)**

The objection expresses concern that designation as a DOS would interfere with the proposed new Lisburn Institute on the site. During our site visits we note that development appears to be completed on part of the site. Another building was under construction on the Wallace Avenue frontage. There is only a small portion of the DOS undeveloped, which is occupied by the Fire Service. They appear to be expanding their operations and are unlikely to release their site for development. We consider that the DOS zoning is therefore no longer appropriate. The Department also point out that designation as a DOS has no effect on the policy context in which planning applications are determined. In these circumstances, we see no reason for the zoning to be retained.

**Recommendation**

We recommend that Zoning LC 56 is deleted from the plan.
HOUSING

Protected City Centre Housing Areas

Designation LC 57/07 – 29-45 Wallace Avenue (objection 43)

The objection related to 29 Wallace Avenue on the basis that it was not in residential use. The Department confirmed that the use of the dwelling had changed to offices and that no. 29 should be removed from the designation. We note that the Fire Service are using the building and agree with the Department’s concession.

Recommendation

We recommend that 29 Wallace Avenue is removed from Designation LC 57/07.

Designation LC 57/13 – Ava Street (objection 3527)

The objection related to 24 to 30 Young Street on the basis that a planning application had been submitted for offices on the site and it was anticipated that planning permission would be granted. The Department did not respond to this point in their statement of case. The dwellings were still present on site at the time of our visit. We can therefore make no further comment on the objection and endorse the Designation.

TRANSPORTATION

Designation LC 58 – Area of Parking Restraint Lisburn City Centre (Objection 2760/35)

Designation LC 58 only defines the areas of restraint. There was no objection to the defined area in the objection. The designation does not impose the parking standards or address the exceptions to the standards to which this objection relates. These matters are addressed in Policy TRAN 4 of the Plan. We have considered objections to TRAN 4 and the parking standards in Part 1 of our report.

NATURAL AND URBAN ENVIRONMENT

Designation LC 59 – LLPA, Governor’s Road (Objection 473)

The objection points out that Christ Church requires additional car parking and part of the proposal extends into the LLPA. There does not appear to be any objection to the LLPA as such. We note that the development of a car park as an extension to the existing facilities (DOS LC 48) has been completed and is in use. The LLPA designation did not affect the proposal. We make no further comment on this objection.

Policy LC 60 – Lisburn Conservation Area, Additional Design Criteria
Policy LC 62 – Urban Design, Lisburn City Centre (Objections 1750, 1950 and 1954, objection 2760/36)
The objections on behalf of Lisburn Institute of Further and Higher Education (1950 & 1954) to LC 60 relate to the principle of additional design criteria for Conservation Areas being introduced in development plans. We have addressed this matter in Part 1 of our report and recommended that Policy UE2 should be deleted. We shall not therefore consider this objection further.

The objections to the urban design criteria on the basis that they were too prescriptive and would not serve to ensure a suitable development for the city centre did not explain what changes were sought. If their solution was deletion of all criteria then this has been addressed in Part 1 of our report. (Policy UE1 refers). Objection 2760 was considered in the strategic section and we consider that the only outstanding matter is that bullet point 2 in the Policy LC 62 is a use not a design criterion, which is a valid point and we consider that it should be deleted.

Objection 1750 claimed that urban design issues had not been addressed. This appears to have been a concern that the Lisburn Strategic Investment document has not been followed. We consider that the plan does address urban design in the city centre and that it is not appropriate to include a framework document as part of a development plan. Such documents have a different role to the plan and rightly should be distinguished from the plan.

**Recommendation**

We recommend that bullet point 2 of designation LC 62 be deleted.

**Designation LC 61 – Historic Park, Gardens and Demesne – Lisburn Castle Gardens (objections 2022/61 and 2334/7)**

Lisburn City Council suggested that an area of terraces and a car park to the south and south-east of the designation should be included. NIEA and the Department agreed that the entire Scheduled Gardens should be included. However, this would not include the car park area as nothing of the original gardens remains above ground. We agree that the terraces should be included within the Designation and on balance, that there is little merit in including a public car park or highway verges in a Historic Garden Designation.

We consider that the designation of the Gardens as a LLPA would be an unnecessary duplication as they are designated Historic Gardens and a scheduled monument. Policy for the protection of ancient monuments and Historic Gardens is contained in PPS6 (Policies BH1 and BH 6 respectively). This is a higher level of protection than a LLPA designation.

**Recommendation**

We recommend that Designation LC 61 is extended to include the additional land indicated above.
Proposal LC 63 – Education Use Castle Gardens Car Park/ Seymour Street (objection 1954)

The Department agreed that Proposal LC 63 should be removed from the plan because LIFHE are redeveloping their existing site between Castle Street and Wallace Avenue (part of LC 56) and this site has planning permission for a mixed use development, which is under construction. In these circumstances, we endorse this approach.

Recommendation

We recommend that Proposal LC 63 is deleted from the Plan.

Lisburn City Council/ Lisburn City Centre Management/ Lisburn Chamber of Trade City Centre Objections (2022/ 1750/ 754)

The approach to the zoning of land for social housing was considered in the strategic section of our report. The lack of any social housing zonings does not preclude applications being considered.

The plan does refer to Lisburn Historic Quarter at Part 4, page 14 of Volume 3. The Department may wish to consider the additional references that Lisburn City Council suggests at their objection (14) to other strategies and publications relevant to the city centre.

The plan does not propose any reduction in car parking. Areas of Parking Restraint have been addressed in the strategic section of our report. BMTP proposes traffic management measures to ensure more efficient use of spaces. This is outwith the scope of our report because it is contained in a technical supplement and is not a proposal in the Plan.

We consider that office policies were addressed in the strategic section of our report and these provide support for offices to locate in town and city centres including Lisburn.

Policies for hotels were considered in the strategic section of our report. Lisburn City Council failed to identify which Development Opportunity Sites were considered to be suitable for their required city centre hotel and so we cannot comment further. A hotel could come forward as a submission for planning permission in any event.

The plan does make reference to the need to increase the night time use of the city centre. For example at page 78 – LC 44 city centre boundary. The strategic housing policies refer to living over the shop. We consider that this addresses the element of objection.
METROPOLITAN LISBURN

LAGMORE AREA

Lagmore Residents’ Objections

The main issues that were raised by the Lagmore residents were that Lagmore glen should be afforded additional protection by designation as an Urban Landscape Wedge (ULW), the promotion of walking and cycling by designating an additional community greenway and the lack of community facilities. Any issues raised regarding public transport and transport policies were addressed in Part 1 of our report.

Lagmore Glen

The Department initially resisted the suggestion that the glen should be an ULW because it was not an open area that separated localities within the metropolitan urban area and would not fulfil the role of helping to define and retain the identities and character of the component parts of the urban area and prevent the merging of different city communities. This was because Lagmore was all one community and one part of the city. There was also considered to be sufficient protection for the open space by virtue of Policy OS1 of PPS8 and for the environment and landscape character by the SLNCI and LLPA designations in the glen. The counter-objectors (developers) agreed with this stance.

Following consideration of the residents’ arguments, the Department stated that the level of concern raised meant that an ULW designation could be appropriate (subject to our consideration in this report). The counter-objectors were concerned at this change in stance and reiterated that there was sufficient protection for the glen with the existing designations and regional policy. The Department had not taken the views of all the community into account. Some residents were in favour of development in the glen. It emerged that there were proposals for a school on the reservoir site. The developers also referred to the Whitelands Inquiry report. The Commission had stressed the importance of linking the two halves of Lagmore with a road. The importance of community cohesion outweighed the negative impact on the environment; it was stated by the Commission in that report.

The residents’ points regarding the unkempt nature of the land have a bearing on this issue because the land is not in public ownership. At the time of our site visits the glen was in a relatively tidy condition. The developers indicated that the open space related to Mount Eagles would be adopted by LCC. There was an offer that the glen itself could be handed over to a Trust, if certain conditions were met. Any residents who supported development in the glen could have taken part in the Inquiry process, either in writing or personally. We can only deal with the representations that we have received.

We are also somewhat surprised by the Department’s change in stance. The designation of an ULW in this location would fit with some of the Department’s strategic thinking in policy UE7 and accompanying justification. It would break up the visual impact of the housing mass and offer amenity and recreational benefits to residents, which are matters referred to in the justification for policy UE7. The Departmental position was also supported by Landscape Branch and NIEA, who informed us that the site was in the top 3 of over 100 sites in a 1992 ecology survey. In all these circumstances we accept the Department’s concession that an ULW is justified. We
agree with the Department that it should include not just the SLNCI/LLPA designations, but all the identified open space in their vicinity.

The Commission's report into the whitelands inquiry did recommend a road linking the two communities and this has been built. We do not consider that this has a major bearing on the issue of the designation of an ULW many years later. Different considerations apply as we have made clear in the paragraph above. We note the developers concern regarding a school proposal. We were presented with evidence that this proposal was in the earliest stages of development and that residents were unaware of its existence. The necessity for it to be located in an area of existing open space has not been tested. In the event that there is no other location then this would be a factor to be weighed by the Department as part of the development management process.

**Proposed Community Greenway**

The residents suggested additional Greenways from Lagmore to LVRP. The suggested routes in Dunmurry appear to us to be a duplication of existing Greenways in the plan. However we consider that the other side (NW) of Creighton Road is another matter. Policy OS2 states that each ULW functions as a Greenway. The Department’s position on the designation of Lagmore Glen as an ULW means that it de facto becomes the route of a Greenway. We consider that there is merit in there being a link from Lagmore to ML24/02 Community Greenway. This would link Lagmore to LVRP. We do not accept the Department’s argument that there are enough Greenways and consider this suggestion to have merit. We also reject the argument that the only routes that should be considered are those suggested by the District Councils. In any event the designation of Lagmore glen as an ULW was not known at the time that the Department consulted the Council. We note that the developers in their statement as counter-objectors had no objection to a Community Greenway through Lagmore glen.

We do not endorse any particular route that was suggested, as we consider that the Department needs to consider the optimum route and clearly identify it as we recommended in Part 1 of our report. We note that Barnfield Road and the Stewartstown Road were suggested. We also note that the line of the Derriaghy River and the open space along Creighton Road were suggested and appear to represent possible routes. We appreciate that some possible routes follow roads but this is also the case with some Greenways already designated in the plan.

**Lack of Community Facilities**

We have considered the plan’s strategy for the provision of retail, health, education and community facilities in part one of this report. This section therefore addresses the site specific arguments related to Lagmore itself. The objection related to open space, recreational facilities, play spaces, shops, community facilities, etc. within Lagmore.

The first point to make is that some of the housing in Lagmore was built before plan preparation commenced and the BMAP housing zonings in Lagmore all have planning permission and many are now built. In these circumstances BMAP has little relevance. We appreciate residents’ frustrations that facilities are not built at the same time as the residential units. There is guidance in regional policy regarding the provision of such facilities (PPS7). The fact that little has been provided to date is a poor reflection on the operation of the planning system in this area. There is one general store and several
other retail or local services units in Mount Eagles, one community centre and one school to serve the whole of Lagmore. We could find no evidence of any other health or community facilities. It may be that there is some relevance of this debate to objection sites on the periphery of Lagmore.

We consider that there is adequate informal open space in Lagmore when the glen is taken into consideration. We agree that there may be a need for more children’s playgrounds and playing fields. Our visits to Lagmore indicate that there are two playgrounds and one small astro-turf football field and one basketball court. We found the counter-objectors argument on these matters to be unconvincing. The other facilities identified in their submissions are all located outside the community of Lagmore. The fact that they are in the same ward does not overcome issues of distance and topography. These are also matters addressed in regional guidance in PPS8 and PPS7. The Department should liaise with the statutory provider (Lisburn City Council) and seek to address the problem through the development management process.

**Recommendations**

We recommend:

- That Lagmore Glen consisting of all the existing open space in the midst of Lagmore (as shown on Map No. 3/001 – Metropolitan Lisburn) be designated as an Urban Landscape Wedge.
- That the Department designates a community greenway running from the above Urban Landscape Wedge to link with designated community greenway ML 24/02 at Creighton Road.

**OBJECTIONS SEEKING ADDITIONAL HOUSING LANDS**

**Lagmore Area Generally**

The consideration of objections to the exclusion of land from the settlement limit will also address the related issues of objections to a site’s inclusion in the AOHSV or RLW or SLNCI or LLPA as relevant to each objection. This section of the report will firstly address the general issues raised by objectors related to Lagmore. These issues were raised by one or more objectors and should set the scene for our consideration of each site. We will also address the general issues raised by counter-objectors that apply to all the sites on which they have made comments.

Argument was presented relating to a critical social housing need in west Belfast relying on evidence of NIHE waiting lists. The solution advanced by the objectors was the release of more land at Lagmore. We have acknowledged the social housing shortfall in the strategic section of this report (Section 3.3). Our conclusion was that the need could be partly met within the existing development limit or on the objection sites that we will identify as suitable for development. In the interim it is incumbent on the Department to address this policy gap for the BMA. In any event, we do not consider that this issue would override other considerations i.e. it would not result in an unacceptable site being included within the development limit.
We have dealt with the issue of a “divided city” and sectarian geography in the strategic part of this report. We concluded that it was not an issue that could be addressed by a development plan. Coordinated action across all government and community groups is required to resolve this matter. In the context of Lagmore we do not accept the argument that this factor should influence the release of housing land in the area. We consider that this is not a factor that should influence the decision either way.

There was also the argument that the housing allocation needed to be spread across the BMA and that Lagmore was the only location available to serve West Belfast. We have considered this issue in the strategic housing section of Part one of our report. The RDS and RDS review indicate that as much of the BMA’s housing need as possible should be accommodated in the existing urban area. Lisburn is specifically identified as a main focus for Greenfield housing provision. However, this is subject to caveats that sites should be on key transport corridors and sites should not be subject to environmental constraints imposed by inter alia, the hills surrounding the city. We consider that the Belfast hills are worthy of protection (as we stated in the West Belfast section of our report) and therefore support the AOHSV designation. This will be a constraint on further development at Lagmore. We do not consider that the fact that the existing housing zonings in Lagmore are approaching completion will in itself override the importance of protection of the AOHSV. This designation is also a new factor affecting the earlier status of some of these lands as whiteland in the BUAP. We do not agree that these lands continue to be acceptable for development merely by virtue of their former whiteland status. The Department is entitled to re-assess lands in the context of a new development plan. We note that some of the former whiteland sites have been included within the settlement limit and in some cases have been developed. Whilst there is one reference to focussing housing on whitelands in HGI 4 (Chapter 9) of the RDS, this is to be determined in BMAP. We can find no other reference to whitelands in the RDS. Significantly they are not referred to in Chapter 6, which deals with the BMA. We must also weigh in the many references to protecting the Belfast Hills, as discussed above. However, we recognise that the contribution of each site to the AOHSV must be assessed in order to decide if such a designation is warranted on that site.

Another important factor is the proposed RLW - Mosside (LN02). We have made our support for these designations clear in our consideration of Policy COU2 in the Countryside and Coast chapter of Part 1 of our report. We note that Diagram 5 on page 62 of the RDS indicates that there should be a landscape wedge between Metropolitan Lisburn and Lisburn City. It is clear that this is the intention because two wedges are shown in this area in the Diagram. These can only be wedges between West Belfast and Metropolitan Lisburn and between Metropolitan Lisburn and Lisburn city. We consider that most objectors acknowledged the principle of the RLW and that a wedge was necessary. Argument focussed on the extent of the RLW with most arguing that it should be reduced to allow their site to be developed. We shall address those arguments below.

Objections were made to housing zonings ML 02/15 & ML 02/16 on the basis that those zonings should be extended to include the objection sites. These are not objections to the zonings themselves (despite the Department’s classification of them as such) and the exclusion of the sites will be considered below.

We were presented with no evidence from statutory agencies that there were any insurmountable issues related to water supply and foul and surface water drainage. We
cannot therefore support the counter-objections to the sites based on the inadequacy of these services in the Lagmore area. We have considered other objections related to services and facilities in the Lagmore area above.

**Large Site North of Lagmore (objections 2529 and 3825/91)**

This large site included all the former whitelands around Lagmore and northwards up to Colinglen Road and on towards Hannahstown. We consider that the inclusion of this site in its entirety would substantially prejudice the AOHSV and the setting of Belfast. Parts of the site are within proposed SLNCIs and LLPAs and development could prejudice those designations. No case or supporting evidence justifying its inclusion was advanced. We shall consider the smaller component parts of the site that were the subject of individual objections in the following paragraphs.

**Lands South-west of Barnfield Road (objections 258, 1061, 1155 and 3160)**

All of these objection sites are south or south-west of Barnfield Road. We consider that Barnfield Road is a strong development limit and the inclusion of sites on the opposite side of this road would weaken the limit. They would also lead to urban sprawl into the open countryside. Objection 1061 is within the AOHSV and we consider that this site is worthy of inclusion within the designation because of its contribution to the landscape quality and setting of the Belfast Hills. Development here would be prejudicial to the designation and detrimentally affect the landscape character of this area. We do not agree that Barnfield Road represents a good access to the site because it is a narrow country road with limited passing places and poor alignment. We do not consider that the site is in such a good location as to overcome the concerns that we have expressed above. We shall consider objection 2962 in the Milltown section of our report.

**Lands at Old Colin Road (objections 317 and 3065)**

These sites are removed from the settlement limit and are within the AOHSV. They are unsuitable for inclusion within the development limit because of the degree of physical separation, which would result in urban sprawl. An applicant’s personal circumstances or need to live on a particular site is covered by regional policy and need not be addressed by an Area Plan. The sites merit inclusion in the AOHSV because of their elevated location within the setting of the city. There is no basis for designating the sites as DOS, which are an urban regeneration tool. The sites are removed from the built-up area where designations of DOS are inappropriate.

**Lands North-west of Lagmore (objections 690, 692, 775, 2447 and 3385 [1B])**

The objection sites in this area were amended to exclude the steeper slopes in the upper part of the site from development. We shall consider the area that was suggested for development only.

Dealing with the lower part of the site first, Barnfield Road is a physical boundary with reasonably mature hedging along its length. However the existing development limit in this area is also defined by mature vegetation and a significant change in level associated with a small stream. We do not therefore consider that there are any development limit benefits that would justify the inclusion of these fields. The internal field boundaries are very well defined by extensive mature vegetation.
The upper part of the site consists of gently sloping fields. We consider that this part of the site does make a valuable contribution to the AOHSV in terms of the setting of the city. The fields appear to support a reasonable variety of plant life. We have an issue raised regarding the nature conservation value of the site. The results of the adjoining objector’s ecological survey relate to this site and indicate that there are important habitats present within the site. The boundary with the existing development is partly open and partly defined by mature vegetation. The submissions appear to indicate that a 5m belt of landscaping should have been provided. This may be an enforcement matter for the Department. We consider that the site should not be included within the development limit because of its valuable contribution to the AOHSV, the mature vegetation on the site and its biodiversity interest. We do not agree that the promise of additional landscaping and open space provision would overcome the environmental concerns with this site. We consider that the development limit would be no better or worse as a result of this site’s inclusion.

Lands North of Lagmore (objections 770 and 2996)

This site was reduced to a small development area adjoining the existing residential development with a 20m landscape buffer around it to provide a better definition of the settlement limit by providing. The developable area comprises semi-improved pasture with limited biodiversity value. There is no separation with the adjoining housing development, other than the dwellings’ close-boarded garden fences, although the objectors’ submissions refer to an approved 5m landscaped buffer along this boundary. There are mounds of soil tipped all along the site boundary. We consider that the site (with a reduced level of development) would be a natural extension to the adjoining development onto low grade pasture. The proposed landscape buffer would provide a better definition to the settlement limit in this area. We consider that the objection site would sit well into the landscape without serious injury to the AOHSV. It would be broadly in line with zoning ML 04/06 to the east. The objector’s promise of management of the remainder of the site and in particular the SLNCI is another positive factor to be taken into account. We consider that this will represent a modest incursion into the Belfast Hills and will constitute a final development limit in this locale. The site is not needed to meet the HGI, however, and in view of our conclusions in Part 1 of the report, we recommend that it is held in a land reserve and only released of required.

We consider that an Article 40 agreement should address the long term management of the proposed landscape buffer and the adjoining SLNCI. This should include the arrangements for public access to this area (if any) and any public footpaths and community greenways. We note that there is a potential access from the existing development and this should be used. We have made our position clear on key site requirements that read as conditions on a planning permission and on standard informatives regarding drainage and flood risk.

**Recommendation**

We recommend that the reduced site as shown on Plan 4 is suitable for housing and should be held in a short term land reserve to meet housing needs beyond the end of the Plan period, if required. Development of the site should be subject to the following key site requirements:
• A Masterplan for the comprehensive development of the site shall be submitted to the Department for approval. This shall specify the area for development to exclude the SLNCI; shall include the provision of a 20m wide landscaped buffer to the northern and western boundaries of the site and shall consider the relationship of the site to the adjoining housing in terms of layout and pedestrian and cycle linkages.
• Access to the site shall be from the adjoining housing zoning.
• The long term management of the SLNCI within the site and the landscape buffer, including the matters of transfer of land ownership to an appropriate body and control of public access to these areas.

**Lands North-east of Barnfield Road (objections 2982 & 3738)**

The site-specific arguments related to the RLW were that the separate identities of Lisburn City and Metropolitan Lisburn were what the text referred to and that their proposal would enhance the gap between Lagmore and Milltown by the provision of a managed landscaped wedge and open space. The gap between Dunmurry and Milltown is negligible and theirs will be wider than that, it was argued.

This site is bounded by Barnfield Road and a lane serving a water abstraction borehole. It comprises several fields and an empty dwelling and outbuildings. There is a steep valley along the boundary of the site with the existing development limit. The entire site is within the RLW between Lagmore and Milltown. It was argued that the majority of the site could be developed without affecting the separation between the two, by providing managed landscape open space at the southern end of the site. We consider that the existing development limit is well defined by the valley. Fair Acre is an attractive dwelling and outbuildings with associated mature trees. The northern site boundary is a slope leading up to the existing settlement limit. It is true that parts of the site are further away from Milltown than some of the existing development. However, we consider that the site comprises an important visual gap, which is worthy of protection. We consider that the existing limit is well-defined and to extend it to Barnfield Road would erode the gap and eliminate its function and purpose. The gap between Milltown and Dunmurry appears small on plan but is accentuated by the topography and vegetation within and around the RLW at this point. We do not consider that the physical size of the gap at this single point should set a benchmark for the remainder of the RLW.

We have considered the northern field in isolation because this was subject to an individual objection (3738). It is defined by the road, the existing limit and a footpath with associated hedges that runs to the rear of Fair Acre. Our conclusion is that its inclusion would create an illogical limit and could lead to pressure for the release of more land nearby. This could also be said of some of the other northerly fields within the site.

**Lands between Lagmore Dale and Milltown (objections 446 & 3015/5)**

The site was considerably reduced to exclude the portion closer to Milltown. The landform slopes up from the Stewartstown and McKinstry Roads and then levels off somewhat. There is a valley associated with a small stream along the boundary of the site with Lagmore Dale. The site is within the RLW and its development would erode the gap between Lagmore and Milltown. The site access and development adjacent to Stewartstown Road would be very prominent and detrimental to the visual gap at this
location. We consider that the existing development limit is well defined by the valley, which appears to be in semi-public use as a recreational area. We therefore consider that the development of the site is not acceptable in principle.

The objection also proposed the provision of some local retail facilities to serve Lagmore and a business park. Land adjoining the development would also be made available for community use. We consider that the proposed retail facilities would not be associated with the residential area that they were intended to serve and therefore would be no more convenient than existing facilities further up the Stewartstown Road. We agree with the counter-objectors that this area is well-served by business units on the other side of the road. The land intended for community use would result in an unusual development limit. The perceived benefits of the proposal would not outweigh the loss of this site as part of the RLW.

Another objection sought that a larger site was included within the development limit for a new college campus. We consider that this development would be contrary to the RLW for the reasons given above. The proposal would have a greater effect because of its larger size. We were presented with no compelling evidence that the proposal was essential and could not be accommodated on another site within the development limit.

**Lands between Poleglass and Lagmore (objections 3385 [1A] & 3825)**

The site lies to the north of Zoning ML 02/15 and appears on plan to be a notch in the development limit, but is in fact a wooded glen between Poleglass and Lagmore. The majority of the objection site is within a proposed SLNCI and LLPA. We consider that the site could not be developed without significant impact on those features that led to these designations. There are some small grassed areas within the site but the sloping nature of the site and their restricted size means that even a limited number of houses on the site would be severely detrimental to the environmental quality of the area. There is a public path running through the site. There appears to have been some attempts to close this path by the erection of gates and fences at either end. There is evidence of some dumping and anti-social behaviour: presumably closing the path was intended to address this problem. We do not consider that the promise of management of the area to assist in curbing this behaviour would be sufficient to override the strong environmental objections to the site. There are no guarantees that building houses would have any impact on the perceived problems. We consider that this important valley can be protected without allowing housing development on the site. We consider that the site should not be included within the settlement limit because of its environmental quality and these concerns would not be outweighed by social housing being accommodated on the site.

**Land between Glenside and Colinglen Roads (objection 2752)**

The site lies at the junction of the two roads and is currently in commercial/industrial use. It is a u-shaped site, as it does not include no. 29 Colinglen Road, which lies in the middle of the lands. The site lies outside the development limit, which is defined by Colinglen Road in this area. As a consequence the site is within the Belfast Hills AOHSV. We do not consider that the merits of the AOHSV designation as it relates to this site are of particular relevance here. The critical issue is whether the fact that an established use abutting the settlement limit justifies inclusion and therefore exclusion
from the AOHSV. The agents made it clear that an employment zoning was sought for the site. We accept that the lands are in commercial use and are urban fringe lands. The site is not large and so inclusion would not lead to excessive growth or sprawl. However, we consider that Colinglen Road is a very strong and logical limit. Whilst Glenside Road does abut the site, inclusion of the site could lead to pressure for inclusion of further lands to the north. Inclusion would break the strong definition provided by ColinGlen Road. The mere fact that the site is outwith the development limit cannot rule out continuation of the established use of the site. Proposals for expansion related to that established use would have to be considered on their own merits. This is basically a development management matter. We therefore recommend no change to the plan as a result of this objection.

Lands at McKinstry Road (Objections 21, 2754, 2904)

There are several factors affecting our consideration of the objections in this area. The land is within the RLW (LN02) in the draft plan. The objectors’ argument that McKinstry Road forms a better and more defensible logical boundary has some merit. There are mature trees along the boundary north of the roundabout. However, we consider that these lands do contribute to the open rural landscape separating Milltown and Dunmurry. Development on these lands would therefore undermine the strategic purpose of the RLW.

We recognise that the Commission recommended that these lands be included within the settlement limit in the report into objections to the Lisburn Area Plan (LAP). This recommendation was not accepted by the Department and the lands remained outside the limit in that plan. The case for their exclusion has been strengthened by the RLW designation in BMAP. We agree with the Department’s stance on the site as expressed in the LAP adoption statement. We consider that none of the individual objection sites would be acceptable on its own.

We have made our position on the overlap between former Green Belt policy and RLW designations/policy clear in our consideration of policy COU2 in the countryside and coast chapter of Part 1 of our report. There is no proposal for a shopping centre on adjoining lands in the plan. We are not recommending its inclusion in the section dealing with retail objections in Lisburn.
OBJECTIONS TO HOUSING ZONINGS

Zoning ML 02/16 – Lagmore (objection 3825)

NIHE proposed that zoning ML 02/16 be zoned for social housing to meet the identified need in the area. This zoning is a commitment with planning permission and has been largely built. It would not be appropriate or indeed practical to alter this zoning at this stage in the process. We take it that the comments regarding zoning ML 02/15 are not intended as an objection to the plan.

Zoning ML 03/06 – Upper Dunmurry Lane (objection 2133)

This objection related solely to the key site requirements for the zoning. The Department conceded that as there was an extant planning permission on the site then these requirements were no longer necessary. We endorse this view and recommend accordingly.

Recommendation

We recommend that the key site requirements for Zoning ML 03/06 be deleted from the plan.

Zoning ML 03/07 – Upper Dunmurry Lane (objection 2109)

The objection sought the inclusion of a small triangle of land within the zoning and consequent exclusion of this land from Zoning ML23. It was part of the planning approval for the site and was necessary for circulation. The Department accepted that this cartographic error should be corrected. The area of land involved will make no appreciable difference to ML 23 and we agree with the parties that it can be incorporated into the housing zoning.

The Department has deleted the key site requirements on other zonings where there is a planning permission on the site, but has not done so in this case. The objector stated that a flood risk assessment was not necessary because Rivers Agency raised no concerns in relation to the 2001 application and there was no history of flooding. The Department did not refute this point. We consider that this is a development management matter because the unrebutted evidence points to there being no flood risk. We consider that this key site requirement should be deleted. The other concern was in relation to the imposition of a landscaping strip to act as a noise barrier. We agree with the objector that there are other possibly more effective methods of noise attenuation. We consider that the reference to the landscaping buffer in the noise key site requirement is unduly prescriptive and could inhibit the design process.

Recommendation

We recommend:

- That the triangle of land as shown in the objection be included within Zoning ML 03/07.
- That key site requirement 5 related to noise be amended to delete the second sentence relating to a landscape buffer.
- That key site requirement 8 relating to flood risk assessment be deleted.

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ML 06 – Social Housing Zonings

Objection 463 to ML 06 overall was not supported by any evidence or any indication of where the more suitable sites are located. We have acknowledged the need for social housing in the Part 1 of our report. There is no basis for deletion of any zoning on the foot of this objection.

ML 06/01 – Jasmine Way, Twinbrook (3825 – NIHE)

The objection stated that NIHE propose that the site will accommodate a mixed use development of 2 commercial units as well as residential. There was no evidence of a planning approval. The site is small and would make little difference to the quantum of social housing. It is located next to existing local shops and could possibly be suitable for the type of development proposed by NIHE. We consider that it should remain as whiteland and NIHE could bring forward its proposals through a planning application.

Recommendation

We recommend that Zoning ML 06/01 be deleted from the plan.

OBJECTION SEEKING HOUSING ZONINGS

Lands at Willow Gardens, Dunmurry (objection 2832)

The objection sought the zoning of the land for housing and referred to a planning application for residential development that was under consideration at the time of the objection. The site has now been cleared and the presence of advertising hoardings, plant and machinery would indicate that the site has received planning permission. The works appear to have commenced and are currently on hold. In these circumstances there is no need to zone the lands for housing. We recommend no change to the Plan as a result of this objection.

Suggested Social Housing Zoning – Stewartstown Road (objection 3825)

The objection refers to the old pumping station on this road, which NIHE says is indicated as white land in the Plan. NIHE state that the site is included in the DSD programme for 12 units. We were not supplied with any information as to the location or status of the site and cannot comment further on this objection. The Department may wish to liaise with NIHE on this matter. We would endorse a social housing zoning should this be practicable. However, as we were not supplied with any information on the site, we can only recommend no change to the Plan as a result of the objection.
OBSESSIONS TO EMPLOYMENT ZONINGS

ML 07 – Kingsway, Dunmurry

Objections 2795 & 2186

Objections 2186 and 2795 sought a zoning of the southern portion of ML07 for housing. This part of the site is between the railway line and residential streets. There is a small housing zoning immediately to the north (ML 03/02). We were informed at the time of the inquiry that there was a planning permission on part of site 2795 for residential development and current applications on other parts of the sites. The Department’s view was that all of both sites could be zoned for housing given the planning history and locational characteristics of the site. We agree with this assessment and recommend accordingly.

Objection 3307

The site is the Makro premises and the objection sought deletion of the existing employment zoning. A development opportunity site (retailing) was suggested for the land. No rationale or justification was presented to support this objection. We do not consider that the site should be identified as a development opportunity site because the site is not vacant or under-used. No other retail designation was suggested by the objector.

The Department’s concession on the above objections and the fact that this site is not in existing employment use renders this zoning completely untenable.

Recommendation

We recommend that Zoning ML 07 be deleted from the plan and that the land within objection sites 2795 and 2186 be zoned for housing. The remainder of zoning ML 07 should be left unzoned.

ML 08 – Dunmurry & Derriaghy Industrial Estates

Objection 3456

This objection sought office uses within Class B1 (a) on a large site within ML08. It was clarified at the hearing that the objection only related to a part of the zoning that was identified in the submission to the Inquiry.

The objection contended that the zoning should have been a Major Employment Location. It was argued that Major Employment Locations should not be confined to Greenfield sites that could take years to develop; existing employment areas should also be identified. The basis for Major Employment Locations is Diagram 5 of the RDS. This diagram schematically identifies 8 Major Employment Development Opportunities. We consider that none of these opportunities relate to this area. There is consequently no basis for designating the site or estate as a Major Employment Location.
The RDS at BMA 2.1 aims to promote urban economic development at key locations, and on suitable sites, throughout the Metropolitan Area. Bullet points refer to identifying strategic locations for employment growth around the North and West Belfast regeneration axis and promoting a renewed focus on regenerating such areas of disadvantage and deprivation. It is a moot point whether the site could be construed as falling within this axis. It is close to this area and is part of greater West Belfast. Sites such as this are seen as having a key role in the government’s Anti-poverty and Social Inclusion Strategy (paragraph 4.10 of PPS4). I take it that this is the new name for TSN, which was heavily relied on by the objectors and referred to in the draft PPS4 in place at the time of the Inquiry.

We discussed the strategic policy context for office uses in the Part 1 of our report. We concluded that the Department’s portfolio of sites was broadly correct. The allowance for offices at Major Employment Locations was considered to be sufficient to cater for the modern demands for business parks as referred to in the RDS and PPS4. This does not mean that these are the only sites that can be considered. Regional policy refers to major mixed use developments as potential appropriate locations, for example. This is not a case involving mixed use development. The case here was related to the site’s location. It was argued that it is a highly accessible location, close to the strategic transport corridor of the A1/M1 and the main rail line. The other argument was that the site was close to areas of severe deprivation and that all potential employment opportunities had to be realised. This was an area that had been targeted as such for many years because of its location close to many disadvantaged areas.

The issues related to the use of the site for knowledge-based, information and communications technology offices (described as Category 10). The claim was that there was an issue of deliverability in terms of timescales. The Department argued that if it could be demonstrated that a proposal could not be accommodated in a city or town centre, then it could be allowed elsewhere if it brought significant economic benefits. The footloose nature of these offices means that they would not wait for an exception to be demonstrated to the satisfaction of the Department through the prolonged development management process. The other issue related to certainty for developers. Whilst the Department accepted that Class B1 (b) or (c) uses were acceptable on all employment sites, developers would not wait for the Department to decide if their proposed use fell within these classes. They would need to know their knowledge-based, information and communications technology office was acceptable in advance.

We do not consider that the locational advantages of the site as described do not outweigh the clear policy support for the city centre as the primary focus for office development. We consider that the Department has catered for the type of offices referred to by the objectors at various Major Employment Locations around the plan area. The objection does not relate to offices as part of a major mixed use development and so this scenario does not apply. There is the exceptional clause in regional policy that would allow for applications for offices that cannot locate in a city centre or other identified location in the plan to be considered. The acceptable B1 use classes also give a reasonable degree of flexibility. The RDS references to the North and West Belfast regeneration axis are in the context of employment creation and economic development generally and not specifically to offices. The industrial estate is a valuable employment resource that has been identified in the plan. That does not mean that it is a suitable location for offices. It must be assumed that the development management process will operate efficiently and it is inappropriate to base an Area Plan on the assumption that it will not do so. We have concluded that this is not a suitable location
for an office allowance and so the question of certainty for developers has been resolved.

There are several approved offices on the site. These were presumably approved under the previous BUAP office policies. They do not set a precedent for the designation of the whole site as an office location. This permission could be used as a benchmark for an acceptable level of offices on the site. They are certainly a fact of the planning history of the site. The offices approved at Sydenham Business Park are of little relevance to the consideration of Area Plan designations on a site far removed from there. In any event, those offices were approved in the context of a different planning context, both then and now. The Belfast Harbour Local Plan applied to Sydenham Business Park and permitted business or office use in that area. It is now part of the Belfast Harbour Area, which has been identified as an important Major Employment Location in the RDS and this Plan. Those offices are therefore distinguishable from the objection site.

We recommend that there should be no change to the Plan as a result of this objection.

**Objections 3216 and 3242**

The objection relates to two sites at the southern end of ML08, next to residential properties. The objector made the point that the original use of the premises as warehousing and headquarters in conjunction with a chain of food retailers had ceased. The premises were vacant at the time of our site visit. The objector claimed that it was highly unlikely that anyone would wish to re-develop the site for industrial purposes because of the proximity to residential properties. There is considerable potential for noise and disturbance to adjoining residential properties, particularly from the larger site south of the Cutts. The evidence was that there had been no complaints in the last 4 years. There were complaints before that related to a night shift operating at the premises. There remains that potential for complaints. We do not consider that there is a visual amenity argument because views of the site from the residential properties are limited. We consider that this is a clear case where the juxtaposition of employment and residential uses indicates that the sites should be omitted from the existing employment zoning and left unzoned. The sites are separated from the main body of the estate by roads and so their loss would not impinge on the estate overall. We do not agree that they should be actually allocated for housing as some light industrial or business use (not including offices) could be accommodated on the sites. Such uses would not give rise to the problems identified by the objector. This is a good location for business uses given the excellent transport links in the area. However, having said that, should a housing application be submitted it could be considered on its own merits in the light of prevailing regional policy regarding the loss of employment land.

**Recommendation**

We recommend that the objection sites 3216 and 3242 be excluded from Zoning ML 08 and left unzoned.
RETAILING

Objections to Designation ML 11 – Dairy Farm District Centre

(Objections 2022/26 & 27, 2903, 3015 and 3450)

Objection 2903 relating to the District Centre being too large was withdrawn at the hearing. Lisburn City Council objection to the identification of land opposite the District Centre as open space was withdrawn at the hearing (2022/26). In these circumstances the remaining issues are related to allowing the District Centre to expand to fulfil the role allotted to it in the retail hierarchy. The counter objection argues that this should not compromise their proposal for a new District Centre at McKinstry Road.

The first issue related to expansion of facilities at the District Centre. The retail study accompanying the plan identified that Dairy Farm was performing particularly poorly and should be allowed to expand. This view was strongly supported by the local community organisations that made objections to the plan, such as West Belfast Partnership and Colin Neighbourhood Initiative. The owners of the centre sought an exception to policy R5 in order to support its expansion. We have recommended that Policy R5 is deleted from the plan in the light of the Department’s final position on the policy. The expansion of the centre would therefore be considered against prevailing regional policy in PPS5. The main concern was that the extent of comparison retailing was very low. Other District Centres have considerably expanded their comparison offer over the years. This was achieved against the background of PPS5. The way would appear to be clear for the submission of applications supported by the evidence of the need to expand the District Centre as expressed in the retail study and acknowledged by the Department. We therefore consider that there is no need to amend the plan in response to this objection.

The lands across the road were withdrawn by Lisburn City Council, but remain in the Colin Neighbourhood Initiative objection. We agree with the parties present at the hearing that there is no justification for the inclusion of these lands at the moment. It would be a case of Dairy Farm running before it can walk. We would wish to see evidence of improvement in the existing centre and definite intentions on the part of DSD, Lisburn City Council and investors before considering major expansion on the other side of the Stewartstown Road. The views of the counter-objector in this regard are supported.

This left two small areas north and south of the designation that were suggested for inclusion, which we shall term sites A and B for the northern and southern sites respectively. The sites were somewhat reduced in the Lisburn City Council statement of case and it is these sites that we consider. Site A contains several retail uses and is an appropriate addition to the District Centre. This takes the centre to a logical boundary of a stream. Site B is a grassed area along the road in front of the health centre. We note that a public art sculpture has recently been erected on the site as part of the regeneration initiative. The Department initially opposed the inclusion of this area on the grounds that it serves as a buffer between the centre and the adjoining housing. This also accords with their recommendation to exclude housing zoning ML 03/03 from the District Centre. We do not agree with the need for a buffer. There is none to the south of the designation and there is a pronounced difference in levels. There is unlikely to be development right up to the boundary. At the hearing the Department
conceded that site B and the ML 03/03 could be included within the District Centre because of the need for expansion and the community/council support. This would allow for the mix of uses that the Council are seeking on the site in order to secure regeneration benefits for the wider area. There is evidence of the need for more land, which is provided by the retail study results. District Centres are about more than retail as paragraph 51 of PPS5 explains. It is therefore valid to consider the mix of uses on the site and plans for expansion of those uses. We conclude that site B and the housing zoning should be included in the District Centre to allow for its expansion.

The counter-objector’s arguments were somewhat confusing. No statement of case was submitted to support the counter-objection or for the withdrawn objection for that matter. This did not assist us or the parties in preparation for the hearing. They did not object to the designation in principle but stated that it was the wrong location for a District Centre because of sectarian issues. This is illogical as it is an existing District Centre. We take it to mean that the expansion of Dairy Farm should not prejudice their proposal for a District Centre to serve east Lisburn (McKinstry Road). Dairy Farm is the designated District Centre in the Plan and the conclusions of the Plan were that it should be allowed to expand. We support those conclusions. We consider that we have addressed the other arguments above.

**Recommendation**

We recommend that sites A and B (as shown on Plan 5) and Housing Zoning ML 03/03 be included in designation ML 11 – Dairy Farm District Centre.

**OBJECTION SEEKING AN ADDITIONAL DISTRICT CENTRE**

**Lands at McKinstry Road (objection 3796)**

This objection sought the exclusion of the site from the RLW (LN02), its inclusion within the settlement limit and its designation as a DOS (retail). The Green Belt objection is no longer relevant. The objector clarified that the objection sought a District Centre on the site in the statement of case. At the hearing it was confirmed that retailing was sought on the site and a District Centre was mentioned for illustrative purposes. We consider that this does not go beyond the scope of the original objection and shall deal with the objection seeking retailing on the site.

We have concluded above that the RLW is an important designation separating metropolitan Lisburn and Lisburn City. We consider that the open landscape on both sides of McKinstry Road including the objection site is an important feature of the RLW in this location. Development on the site would prejudice the RLW and this objection cannot be sustained on its own merits. A landscaping belt along the road would not address this concern related to the principle of the open landscape and its function as a green wedge. However, we need to consider the other overriding matters raised by the objector.

There may be a need for more convenience retailing in this area: we have insufficient information to assess this claim. In any event, that does not mean that any site will be acceptable no matter what its circumstances. Dairy Farm is the designated District Centre for this area. It is clearly under-performing but allowing a new superstore on this site will not assist the existing District Centre. We cannot support the objectors’
approach which seems to suggest designation of a new District Centre in case of the failure of the existing centre. The plan has designated 12 District Centres, which should be sufficient for the plan area. We must be mindful of the overriding policy objective of enhancing the vitality and viability of city and town centres. The Department also correctly advised that new retail developments can be considered under PPS5 and this would address the need argument expressed by the objectors. We are conscious of the community support for Dairy Farm and opposition to this site. This included the Lisburn City Council, Colin Neighbourhood Initiative and West Belfast Partnership. This public concern reinforces our conclusions.

The objector provided evidence of expressions of interest from retailers in constructing a supermarket on the site. There are large areas of new housing existing and proposed along the North Lisburn Feeder Road. That does not justify retail development on this site. Retail development should be located in existing centres or if no sites are available then edge of centre sites should be the first preference. In this case there is a designated centre approximately 1 Km away with more than adequate land to accommodate a supermarket. There may have been issues around covenants on the site that prevented development in the past. The evidence was that these have been lifted. We do not consider that a peripheral location such as this is the best place for retailing or a new District Centre, as suggested by the objector.

We consider that in all these circumstances, the Plan should not be changed as a result of the objection.

NATURAL AND URBAN ENVIRONMENT

Objection to Designation ML 13/02 – SLNCI Colin Glen (objection 203)

This objection had no evidential basis and cannot therefore be considered further.

Objection to Designation ML 16 – Colin Road LLPA (objection 3015)

No plan was provided to identify the objection site or the land concerned. No case was advanced to object to the LLPA on landscape grounds. The only concern was a potential impediment to an extension to the Lagan Valley Education Project. LLPAs do not automatically preclude development and any future proposal to extend the centre and prevent an area being used for anti-social behaviour would be assessed on its own merits and within the context of Policy ENV 3. We recommend no change to the plan as a result of the objection.

Objection to Designation ML 20 – Laurel Glen LLPA (objection 3825)

NIHE objected to the designation of land at Stewartstown Road opposite Dairy Farm District Centre and its identification as open space. The objection refers to the site’s inclusion in the DSD social housing programme. No details of the land involved were supplied. In the absence of any details as to the extent of the open space zoning included in the objection we cannot reach any conclusion on this objection. We note that Lisburn City Council objection to the identification of land as open space was withdrawn, which may indicate that the Council’s proposals for development on the land are not being pursued. In the absence of clear evidence of the proposals for social
housing on the land or any identification of its extent, we are unable to support the objection and recommend no change to the Plan.

Objection to Designation ML 22 – Area of Townscape Character (ATC), Dunmurry (Objections 345, 2004. 2305, 2795 and 3791)

Objection 2305 was directed at the whole principle of designating any Conservation Areas or ATCs as this would constrain commercial development in beleaguered town and local centres. We cannot recommend that all planning legislation and policy is re-written as the objector appears to suggest. The comments on the design criteria in Policy UE3 of the plan were in Part 1 of our report. The designation does not preclude development within an ATC, nor imaginative design solutions. The objectors concerns relate to the economic health of Dunmurry and we fail to see the designation of the ATC as the cause of the problems identified.

Objection 2004, 2795 and 3791 did not state the basis for their overall objection to the ATC designation. We have considered the information provided by the Department including their consultants’ report and conclude that the designation is merited. We consider that the sites suggested to be excluded (2004 and part of 2795) are an integral part of the ATC and should not be excluded. This does not mean that no development will be permissible on these sites.

Objection 345 did not identify which buildings should be excluded from the ATC because they do not have the key features of the area as defined in the designation. We do not agree that designation ML22 is unsupportable in the light of our conclusions above. We cannot therefore make any further comment on this objection.

OBJECTIONS TO DESIGNATION ML 23 – URBAN LANDSCAPE WEDGE COLIN GLEN (LISBURN)

Land adjacent to Springbank Industrial Estate (ML 09) (Objections 3824/8/9/12/13 & 2022/20)

Invest NI objected to the boundary between ML 09 and ML 23. They pointed out that part of the employment site lay within the ULW designation. The Department accepted that there was a drafting error and that the lands should be excluded from the ULW. This could be done without prejudice to the objectives of the ULW, given the size of the site and the remaining ULW. We agree that the site is clearly integrated within the industrial estate and should be excluded from the ULW. As the identified lands are affected by ML23, there is no objection to BT101 to consider. The site is also within Colin Glen LLPA (BT120) as shown on Map 4/127. The objection also related to the site’s inclusion in the LLPA. The Department’s statement of case conceded that the site should be removed from the LLPA. We consider that it would only be logical to exclude the developed site from the LLPA along with the rest of the industrial estate. The site is clearly not open space and should not be indicated as such. The site should be included within existing employment designation ML09.

We note that Lisburn City Council objected to the omission of any reference to Springbank Industrial Estate in the Lisburn District Volume. This is clearly a mistaken objection because it is listed as zoning ML09 on page 111.
Objection 610 stated that lands within ML09 unused by 2008 should be returned to ML23. We cannot agree with this suggestion because the purpose of a development plan is to provide certainty for developers. We also consider that ML23 is extensive at this point and expansion would not significantly enhance its role and function.

**Recommendation**

We recommend that the extent of Springbank industrial estate as shown on the attached land ownership plan (Plan 6) be excluded from the area identified as existing open space, from Designations ULW ML 23 and LLPA BT 120 (Plan 7) and that this land is included within the existing employment Designation ML 09.

**Lands South of Stewartstown Road (Objection 2170)**

This objection related to an area of land to the south of Stewartstown Road adjoining the Glen River. The site slopes down from the road and widens out to the southern end. There are trees around the edge of the site and particularly along the River. The site is designated as an ULW and links with BT101 ULW in the form of Suffolk playing fields on the other side of the Glen River. The reference to any housing on the site was withdrawn at the hearing. The objection sought a nursing home on the site and in return access along the river would be provided. We note that a Community Greenway is indicated along the River. This objection was considered as part of our assessment of objections to Policy UE7 and our conclusion was that the Policy’s stance in terms of permitting only outdoor recreational uses was justified. The proposal is not ancillary to the open space or recreational use of the site. The Community Greenway could be provided anyway and is not dependent on the proposal being approved. The proposal would adversely affect the role and function of the ULW.

We do not consider that the proposal and associated benefits would justify removal of the ULW designation on the site. We recommend that there should be no amendment to Designation ML23 as a result of this objection.

**Lands at Creighton’s Road/ Old Golf Course Road (Objections 2121 and 2131)**

The sites lie on either side of Creightons Road and are separated from the remainder of ML23 by Old Golf Course Road. The lands were reserved for landscape, amenity or recreation use and were part of a landscape wedge separating Dunmurry and Suffolk in Belfast Urban Area Plan 2001. Site 2121 was zoned for amenity/open space/recreation use in Lisburn Area Plan 2001 (Zoning LD17). The plan stated that this area was designated to act as a buffer zone between Dunmurry By-Pass (Creightons Road) and existing housing. There were appeals by the objectors for similar development in respect of both sites (2006/A0463 & A0464), which were dismissed in January 2008.

The objectors are a Housing Association and indicated that the sites would be developed for social housing. There was a similar objection from NIHE (objection 3825). The main issues in the consideration of these objections are:

- The functionality and connectivity of the sites as open space and as part of the ULW.
• Whether the need for social housing should outweigh the ULW designation.
• Planning permissions, re-zonings and road schemes in the area that have affected the ULW.

2131 is an island of land between 3 major roads. Creighton’s Road and Old Golf Course Road separate it from the remainder of ML23 in this locale. These are both wide, busy main roads and so the value of this site in terms of connectivity and the strategic purpose of the ULW is limited. The remaining open space to the south-west has been built upon and so 2131 does not connect to any other open space.

2121 on the other hand links to the golf course by means of an underpass, which is on the route of community greenway ML24/01. An area of open space designated as part of LLPA ML17 lies to the south-west of 2121. This LLPA is an extensive swathe of open space that links to the Derriaghy River and LVRP. We consider that 2121 can make a valuable contribution to open space linkages in the area, namely linking ML23 to LVRP. We accept that the purpose of designation in Lisburn Area Plan as a buffer zone is no longer particularly relevant because of the mature planting along Creighton’s Road. However, we consider that the value of the site as open space is an important consideration.

The evidence of a critical need for social housing in the wider area was not challenged. NIHE provided figures of the waiting list in greater West Belfast rising from 1479 in March 2003 to 1971 in March 2007. The Lisburn Dairy Farm (includes Poleglass and Twinbrook) had a housing stress waiting list of 404 in March 2007. We have no more recent information on the trends in housing need since 2007. We note that NIHE formally objected to the zoning of both sites and sought zonings for social housing. We addressed the strategic issue of the lack of social housing in part one of this report and our conclusion was that the measures to address the shortfall should be taken forward as an amendment to the Plan. There is a requirement to assess the generalised social housing need against the particular circumstances of these sites in order to reach a conclusion on the issue.

We note that ML04/08 was also a housing zoning in Lisburn Area Plan as zoning LD9 and so its release for that purpose was in accordance with the development plan. The area to the south-west of 2131 was also zoned landscape, amenity or recreation use in BUAP, which was the applicable development plan for that area prior to BMAP. Despite this zoning planning permission was granted for a residential development for a housing association and for schools. Obviously the Department must have considered these to be cases of substantial community benefits decisively outweighing the loss of open space. The housing association scheme post dated the publication of PPS8, which contains this test regarding the loss of open space in policy OS1.

We consider that the circumstances of objection site 2131 are such that the benefits of social housing would outweigh the loss of the lands to the ULW. The two factors of the degree of separation from the remainder of the wedge and the approval of housing on adjacent lands undermines the contribution that the site makes to the wedge. The valuable contribution that the site could make to social housing provision for the area in the context of the identified critical need is a determining issue in this case. There are important areas of nature conservation interest and vegetation within the site that should be safeguarded by the imposition of key site requirements. This should be identified in a Masterplan prepared after a proper survey of the site. The concept plan can also show how the scheme will relate to the provision of Community Greenway ML
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24/02, which is shown running along the site in the Plan. In terms of access requirements, transport assessment is covered by regional policy. We agree that access should be from Upper Dunmurry Lane for several reasons related to it being the location of the existing access, the importance of retention of the boundary vegetation around the site and the role of Old Golf Course Road as a distributor road.

In regards to objection 2121, the site does connect to the remainder of the wedge and to open space along Creighton’s Road. In these circumstances, we consider that the benefits of additional social housing would not outweigh further loss of the ULW.

**Recommendations**

We recommend that:

- Objection site 2131 is removed from Designation ML 23 and is zoned for Social Housing subject to key site requirements relating to the development being in accordance with a Masterplan that has been prepared following a survey of the nature conservation interest and landscape features of the site. The Masterplan shall provide for areas of nature conservation interest and important areas of existing vegetation to be retained and for Community Greenway ML 24/02. The key site requirements should also specify that access should be from Upper Dunmurry Lane.

- There is no change to the Plan as a result of objection 2121.

**Other General Objections to Designation ML 23**

The objectors’ argument that the ULW should extend along both banks of the Glen River is not practical. Zoning ML10 is an existing industrial estate and ML 03/07 is a commitment in the plan. There is an extensive area of playing fields on the opposite side of the river that are designated ULW. We note that ML 04/08 has been developed. Part of the site is a SLNCI and there were requirements for the provision of a buffer and a community greenway along the river. This will provide linkages between the ULW, areas of open space and LVPR. We note that open space is shown on the plan maps for information only. The status of any open space provided as part of the development would not be affected merely because it is not shown on the maps. Overall, we therefore must accept the Department’s conclusion that the plan proposals cannot be changed to accommodate these objections.

The suggestion was advanced that the triangle of land between the M1, Black’s Road and Kingsway should be incorporated into the ULW. This area of land is within Belfast City, but we deal with it here as the arguments related to this ULW. We must reject this for several reasons. This area is separated from the ULW by major roads, substantial residential development and an industrial estate. There is no ULW or open space in Belfast City area nearby either. The land would not therefore perform the function of an ULW as set out in strategic guidance. The open space value of the land has been compromised by a large park and ride facility, which occupies most of the site. We note that the transportation proposals include the completion of the motorway junction and a new link road to the east. These works would further compromise the open nature of this land. We therefore consider that there is little merit in this suggestion.
Lisburn City Council’s reference to the importance of a right of way to the golf course from Black’s Road is not a matter for the development plan, which does not designate rights of way.

OPEN SPACE

Richardson Park, Thornhill Road, Dunmurry (Objection 466)

The objection sought that the park be designated for housing development along with zoning ML 03/01. This is an area of football pitches with a club house building. We do not consider that any persuasive argument has been presented to justify the loss of this area of recreational open space. There is no evidence or examples quoted to support the assertion that this site is more suitable for housing than some other zoned sites. There was no evidence that these facilities are surplus to requirements or no longer in use. We consider that the Plan should not be changed as a result of this objection.

Lands adjacent to Dunmurry Cricket Club (Objections 2022 & 3296)

The original objection site includes the McComb Park cricket ground, Ashley Park football ground and adjoining areas of open space. Some of the site is designated as part of LLPA ML17 – Derriaghy River. The Department were of the view that McComb Park and Ashley Park should be removed from the LLPA designation, presumably because these areas were not of sufficient landscape value. The cricket club reduced the objection site to solely relate to the area of surplus lands between the pitch and the boundary of the Areema housing estate. This is therefore the only area that we can consider in terms of an amendment to the LLPA. The Department’s concession removes the vast majority of the reduced site from the LLPA. We find the Department’s concession somewhat surprising in the context of their stated position on objection 2121 and the fact that the land next to Areema remaining in the LLPA. This concession was subject to our consideration. We do not agree that the reduced site should be removed from the LLPA because it forms part of the open space linkages in the area and part of the setting of the cricket grounds. There are also landscape features along the northern boundary that the Department wished to remain in the LLPA. LLPAs do not automatically preclude development. We therefore recommend no change to the LLPA as a result of this objection.

The main objection, however, was to the indication of the surplus lands as open space. The original objection does not specifically refer to an alternative proposed use for the site. The only reference is an objection to the open space provision on the lands as per the last objection to Lisburn Area Plan on this matter. The objection to Lisburn Area Plan was that the site be zoned for housing purposes. On this somewhat tenuous basis we propose to consider the objection to BMAP to include a suggestion that the land be zoned for housing.

The Department’s only case was that the site was shown as existing open space as required by PPS8 and that the objectors’ arguments could be addressed as part of the consideration of a planning application. This is not accurate. A development plan can identify open space as suitable for another use and so the objection seeking a housing zoning falls to be considered. The open space is of little amenity or recreational value and its loss would not be a quantitative issue given the large amount of open space in
the area. We note that LCC objected that the adjoining open space at Areema was not indicated as existing open space in the Plan. We agree and consider that it should be so indicated. The land appears to be in excess of 1 hectare (the Department’s criterion for indicating open space in the plan) and in any event adjoins other open space.

The objector has pointed out the benefits to the cricket club in terms of reducing vandalism and providing an income for improvements to facilities. The community benefits were described as removing the site as an area of anti-social behaviour and the provision of community walkways. We consider that the open space links in the area can be safeguarded by restricting the development area away from the river. The key site requirements could also provide for walkways and for the protection of the trees along the northern boundary of the site. This leaves the prominence of the site as a raised island of development in an area of open space as the remaining issue. We agree with the Commissioner’s assessment in the Lisburn Area Plan report that the site is prominent. The development of this site for housing would be prominent and would intrude unacceptably into the midst of an area of open space and landscape value. We do not consider that the community and other benefits as described would out-weigh these concerns. We therefore recommend no change to the site being indicated as existing open space in the Plan.

**Recommendation**

We recommend that the area of land between the Areema housing estate and ML 17 be indicated as existing open space in the Plan.

**Open Space Objections by Lisburn City Council (2022)**

**Land at Poleglass**

The Council state that land indicated on their Map 52 should be zoned for recreational purposes because facilities are aligned with the Sally Garden Community Centre on the site. The site contains the community centre and a school. We see no need to designate the land for recreational purposes, as it is already being used for that purpose. Open space is indicated on the plan for information only. Its status is not affected by whether it is indicated or not. However, as the site appears to be in excess of 1 ha., it should be indicated on Map No. 3/001, for consistency.

**Land at Summerhill Road (adjoining ML 02/06)**

This area of land should be considered for indication as existing open space because it adjoins a larger area of open space.

The other objections to the technical supplement cannot be considered because it does not form part of the Plan. The Department has set out their rationale for the indication of open space, which we accepted in our strategic analysis of that topic.
LISBURN TOWNS

HILLSBOROUGH AND CULCAVY

General objection to the development of Hillsborough, density of housing zonings and traffic issues within the town (objections 226, 289, 291, 1001, 1249, 1303, 1336, 1353, 1421, 1481, 2587, 3276, 3308, 3321 and 3332)

Hillsborough is a town within Lisburn City Council area. Its status as such was not challenged in the objection or in any other objection (as far as we can gather). The Department indicated that there was a need for additional land to be allocated to provide approximately 100 dwellings. We have considered this figure in Part 1 of our report and accepted that it is broadly correct. However the final figure will depend on our analysis of the site specific objections. The objection to the housing density figures in the Plan is misplaced we consider that the density range as shown is generous and allows for considerable discretion in the determination of planning applications. We were provided with no evidence regarding what any traffic problems exist, other than an assertion that 6,000 vehicles a day pass through three main streets that were designed for horses and carts. The housing growth in the Plan is modest. Many of the allocated sites have already been built and so the Plan cannot address those designations. The objection complains of the lack of parking facilities. No sites are indicated as possibilities. Indeed the objection refers to the importance of the historic fabric of the town and the importance of preserving the approaches. The town centre is a Conservation Area, where there is a statutory duty to preserve or enhance the character and appearance of the Conservation Area as a whole. The Plan designates Historic Parks, Gardens and Demesnes as well as LLPAs. This range of designations imposes a duty on the Department to ensure that the unique character of the town is maintained. The complete cessation of any development in other locations around the town cannot be accepted. The major housing allocations in the draft plan have all been carried forward from the extant Lisburn Area Plan 2001. In this context we recommend no change to the Plan as a result of these objections.

Objection related to development outcomes in Hillsborough (objection 1918)

This objection related to development under construction and with planning permission around Hillsborough. As this is committed development then there is no effect on this plan. The objection is concerned with the application of regional policy and the determination of planning applications by the Department. We have addressed the protection of heritage assets and the overall development level in the paragraph above and Part 1 of our report. We would re-iterate that substantial expansion of Hillsborough beyond existing commitments is not envisaged in the Plan. We can detect no other alteration to the Plan that is suggested within the objection and recommend no change to the Plan as a result.

Objection to the settlement limit around Hillsborough (objection 2431)

One of the functions of the development plan is to provide for the growth of settlements commensurate with their position in the hierarchy and in accordance with the plan strategy based on the RDS. We consider that the designated settlement limit does allow for some future growth of the town in accordance with the plan strategy. There are several zoned sites that have not commenced development. We have also recommended that additional lands should be included to meet the needs of a longer
period in line with our strategic conclusions in paragraph 3.2.76 of Part 1 of this report. We cannot therefore support the objection in general terms, but must rather deal with any individual sites suggested for inclusion. In this case the objection does not identify any sites for inclusion to meet the perceived shortfall and so we cannot consider it any further.

Objections to the exclusion of lands from the settlement limit of Hillsborough

Large site to the north of Hillsborough and Failure to indicate a Hillsborough Bypass (objection 3282)

A by-pass to the North and east of Hillsborough was suggested in this objection. This would be funded by developers and would alleviate traffic problems in Hillsborough itself, it was claimed. The funding would be generated by the release of land outside the development limit for housing. Hillsborough is already passed by the A1 for strategic traffic and the main junctions on the A1 at Hillsborough are scheduled to be improved. The amount and nature of traffic passing through the town itself would not warrant a second by-pass because it would not complement the strategic highway network. The only other way in which such an extensive road could be justified is in association with adjoining major housing development.

The objection initially related to an extensive swathe of land south of Harry’s Road and north of Carnreagh, all the way to the Comber Road. The objection included reference to a by-pass to take Ballynahinch traffic from the town. The objector submitted a reduced site, which consisted of 5 parcels of land on either side of the A1 at the time of the Inquiry. We take the view that the site must be taken as a whole and so shall not consider the 5 elements separately.

We consider that the site is too extensive and its inclusion is not justified in the context of our strategic conclusions in respect of the future growth of Hillsborough. We consider that development of the site would be detrimental to the setting of Hillsborough and Culcavy. The importance of the landscape setting of the approaches to the settlement has been recognised in the plan and its predecessors. We agree with this principle. It is a very important consideration and is determining in this case. The proposal to improve the M1-A1 link is many years away if it ever happens at all. The current thinking shows the scheme well to the north of the objection site in any event. We were provided with no evidence to either justify a possible Hillsborough by-pass or how development of the site would contribute to its realisation. It would appear to be unrealistic in the context of the reduced site.

Whilst we recognise that there may be shortcomings in the service provision within Culcavy, we do not consider that this relatively minor issue could possibly warrant the scale of development proposed in the objection. There are local services in Culcavy and Hillsborough and a large foodstore at Sprucefield a short distance away. There is no indication in BMTP of a spur road being provided to Culcavy from the Maze site, which is a strategic land reserve on the other side of the M1.

We recommend no change to the Plan as a result of this objection.
Culcavy Industrial Area

Objection 2022/66 – seeking the inclusion of lands within the settlement limit as existing employment/industry.
Objection 3783 – seeking designation as a DOS and inclusion within the settlement limit and objection to LLPA HH 11

These objections relate to several factories to the north of Culcavy that are outside the development limit in the plan. Lisburn City Council argued that these employment uses should be included within the settlement limit because of the policy restrictions on industrial and employment uses in the countryside (for example, the presumption against new buildings). We can see the logic of the Department’s response. The inclusion of this extensive area of land could distort the housing figures if the site were to be developed for housing. Also, the employment uses appear to be operating satisfactorily in their current location. We note that all the factories and buildings appear to be occupied. There is a large area of open storage to the rear of several units. However, the Department’s case on this point was undermined by their response to objection 3783. We cannot agree with their interpretation of paragraph 14.3 of the June 2007 paper that a positive score in their matrix under any other comments outweighs any negative score. This does not relate to whether a site is fundamentally acceptable. It surely relates to more minor problems with a site being outweighed. The approach adopted here could lead to completely inappropriate large sites being included in the settlement limit.

The 3783 objection site extends to around 15 hectares. It does not relate well to the existing limit and would not provide a logical boundary, being an unusual shape protruding into the countryside. The main buildings on the site are in use and do not appear particularly unsightly. The nearest residential properties are on the opposite side of the road and not next to the employment uses. We consider that the planning gain argument is therefore weak in this case and that this peripheral location is not a suitable one for expansion of the town. These factors lead us to conclude that the Department’s approach is incorrect.

We can see merit in the inclusion of the buildings on the site within the limit as existing employment zoning. We consider that the open areas of roads and storage should not be included. We invite the Department to consider this point in the light of their comments on objection 3783 at the hearing.

The LLPA was not objected to in principle. During discussions at the hearing, the Department’s Landscape Architect accepted that the important feature of the LLPA designation was the stream corridor. We consider that designations should identify only the important landscapes worthy of protection. We invite the Department to re-consider the LLPA boundaries in the light of the expert witness evidence to the inquiry.

**Recommendation**

We recommend that:
- The existing employment buildings as shown on the plan accompanying objection 2022/66 be included within the settlement limit and zoned as existing employment land.
- The network of roadways to the rear (north) of objection site 3783 shall remain in the countryside outside the development limit.
• The LLPA boundary be re-considered in line with our consideration above.

**Lands at Aghnattrisk Road**

**Objection 269 (incorporating objection 3603)**

We have recommended above that the part of this site in employment use be considered for zoning as existing employment use. Our consideration will be confined to the remainder of the site. The objection refers to the exclusion of this land from the Lisburn settlement limit. The lands are several kilometres away from the Lisburn limit. In the context of Hillsborough, we consider that the site is too large to be included within the limit. Inclusion would represent urban sprawl in a peripheral location remote from the town centre. Parts of the site are very prominent as they rise up from Aghnattrisk road. Objection site 3603 adjoins the limit. We do not agree that development of the site would create a more visually amenable approach to Culcavy. The existing limit is well defined by extensive mature vegetation to the west of the adjoining factory building. The main field rises up from the road and so development would be very prominent. We consider that this area is unrelated to the Maze site and is in a remote location. This part of the site is not suitable in its own right. We consider that there should be no change to the Plan as a result of these objections.

**Objection 972**

This objection was reduced to one field to the west of the junction of Aghnattrisk Road and Culcavy Road. We have recommended that the Department consider whether the main employment area north of the Aghnattrisk Road should be included within the limit. This does not include the lands to the west of this site. In this local area context we agree with the Department that the road forms a strong obvious boundary. The site retains an open agricultural quality, which separates the small ribbon of roadside dwellings to the north from Culcavy. We do not consider that the site would represent rounding off or infill in terms of urban form. We do not consider that the presence of a bus stop, etc. at the roadside alters our conclusions. We accept the site is relatively flat and development would not be prominent. The issue relates to development limit characteristics, urban form and the peripheral location of the site.

We recommend no change to the Plan as a result of this objection.

**Lands adjacent to M1, Culcavy Road (Objection 2906)**

This objection relates to land approximately 500m north of the development limit, which is in use as warehousing and employment. We do not consider that it would be appropriate to include this remote site within the limit as this would result in excessive growth for the settlement. No case was advanced to support the objection and there are no further issues to consider.

**Lands at Harry’s Road**

**Objection 3514**

We consider that Harry’s Road forms a strong and obvious boundary to the north of Culcavy. The site would breach that boundary. The inclusion of the site would result in
a protrusion of development unrelated to the existing built form and isolated from any other development. The field nearest Culcavy Road is open and presents a clear separation from the buildings on the eastern part of the site. We recommend that the settlement limit remains at Harry’s Road in this area.

**Objections 1344 and 3031 (same site)**

The site was considered suitable by the Department in their June paper. It is not prominent from Harry’s Road as views are limited by the landform and existing buildings along the road. There is a good hedge along the road at the moment that screens views from the short site frontage. However, the northern field would lead to prominent and skyline development to views from the north on the main approach to Culcavy. There would be no such issue with the larger southern field.

There is a possibility that access could be obtained from the adjoining housing area (Eglantine Close). Zoning HH 03/02 has been completed. The relationship between the site and existing housing is relatively straightforward. The site would not represent excessive growth in one direction. Development would be well-connected to the existing settlement form. The proposed limit would be defined by hedges and trees. Our concerns are the size of the site in terms of limited growth envisaged for Hillsborough, the fact that development on the northern field would be skyline and the site’s location on the periphery of Culcavy. In view of these factors, we cannot support the Department’s opinion to include the site in the development limit.

**Lands west of Culcavy (objection 3322)**

The site lies in the countryside west of Culcavy where the settlement limit is close to the main Culcavy Road. In the vicinity of the site there is a large mill pond and 3 large detached dwellings set in mature parkland. A small development of new dwellings (Blackberry Lane) and a sewage works are situated close to the southern part of the site. The lands to the west comprise of agricultural fields at the moment. The southern field is defined by mature trees and hedges with some gaps.

We consider that the main plank of the objector’s argument related to planning permissions for a major golf course and tourism development on lands to the west of the site. They considered that the site would sit into a notch in this development and was suitable for low density housing. We have examined the masterplan of that development that was provided. Much of the surrounding land would contain golf holes. This would retain a sense of an open landscape. There would be a small enclave of holiday cottages immediately to the west of the site. These are outside the objection site and were presumably considered to be an acceptable development in the countryside. We consider that the site is an important element in maintaining the separation between any future development and the settlement limit. We do not consider that this small tourism development justifies the inclusion of the objection site. The main hotel/club house complex is over 500m from the site. The other group of proposed holiday cottages is approximately 200m from the site on the other side of a 9-hole golf course. Annacloy House is about 1 Km away on Trench Road, where the green-keeping buildings are also proposed. We do not agree that the site is a notch in the built form because most of the land around the objection site will remain free of built development. We prefer the Department’s assessment that the inclusion of the site combined with the holiday cottages would constitute significant expansion in one direction and urban sprawl. It would not provide a logical settlement form.
The evidence was that outline planning permission for the golf course had been granted at the time of the Inquiry and that full planning permissions were partially granted and the remainder were imminent. The agent indicated that work would start straight away. However, no building works or golf holes were present on site at the time of our visits. This weakens the objectors’ case further.

The northern portion of the site is within the Mill Pond, Culcavy LLPA (HH 10). There was no objection to the LLPA designation. Development of this part of the site would be very close to the mill pond, which is the key feature of the LLPA, as described in the plan. We agree that development (even at a low density as suggested) would be detrimental to the character of the LLPA. This also counts against the objection. The holiday cottages are further away from the mill pond, separated by an access lane and so would have less impact on this key feature. No other built development is shown within the LLPA on the masterplan provided.

We recommend no change to the Plan as a result of this objection.

Carnreagh Area, Hillsborough

Lands at Carnreagh Road (objection 3062)

The original objection only refers to the inclusion of the land within the settlement limit. The Department assessed the objection on the basis that it sought a housing zoning and the objectors’ statement of case argued for a housing zoning. In these circumstances we shall consider the objection on that basis.

There is built development all along Carnreagh Road to the east, which is visible when travelling along the road, despite some screening vegetation. The lands to the south and west of the site are housing zonings in the plan. We therefore consider that this site would represent a logical rounding off of the development limit. The mature vegetation around zoning HH 03/05 means that views of the objection site from Lisburn Road (the main road into Hillsborough) are very limited. The critical views identified by the Department relate to the approach from Carnreagh to the north and along Carnreagh Road i.e. immediately adjoining the site. Views from Carnreagh are limited by the topography and then roadside vegetation as one approaches the junction with Carnreagh Road. The only substantive views are therefore from Carnreagh Road. It is true that the southern boundary of site is at a local crest, but the topography in this area is a rolling one and the land falls and rises to the north up to Carnreagh. We cannot agree that this approach to Hillsborough is an important one and consider that the development of the site will be visually contained by the surrounding land zoned for development. We fail to see the importance of this view and consider that the development would have a minor impact on the setting of the town. The site is reasonably close to the town centre and local facilities. The site can be accessed from the adjoining zoning and so the impact on Carnreagh Road can be minimised. We recognise that the northern boundary of the site needs to be strengthened by means of additional planting to supplement the mature trees at the western end. This can be achieved by means of key site requirements. The site is not required to meet the HGI, however, and should be placed in the STLR.
We consider that the majority of the key site requirements suggested by the Department are superfluous. The density should be in the standard range of 15-25 dph, given the site context: there is therefore no need to specify a lower density. We would question the need for a Masterplan for such a small site surrounded by the built-up area. The only specific requirement is misleading because access may not be onto Carnreagh Road and so upgrading works thereon would not be necessary. The remaining items can be addressed in the consideration of a planning application or are addressed by regional policy.

**Recommendation**

We recommend that the lands are suitable for housing and should be held in a short term land reserve to meet housing needs beyond the end of the plan period, if required. Development of the land shall be subject to the following key site requirement:

- The existing NE boundary of the site shall be supplemented by a 5-8m wide buffer of trees and hedges in accordance with details submitted to and approved by the Department.

**Land to rear of 23 Carnreagh (objection 3182)**

This is a very small site in a triangular notch in the development limit. The objection states that it is the rear garden of the above property. The site is surrounded by mature trees and appears to be a logical small-scale rounding off of the limit. We consider that the site should be included in the limit.

**Recommendation**

We recommend that the site be included in the development limit for Hillsborough.

**Land adjacent to 47 Carnreagh (objection 1911)**

This is a small site adjoining the settlement limit. There are distant views of the site from Carnbane Road. From here it is seen in the context of the dwellings to the south and the large farm complex to the north-east. The northern and western boundaries are defined by hedges thereon or nearby. There is a new replacement dwelling on part of the site. We consider that the site represents small-scale rounding off and relates well to the settlement limit. The site is partly developed and its inclusion would appear to be logical.

**Recommendation**

We recommend that the site be included in the development limit for Hillsborough.

**Comber Road**

**Objection 3503 (incorporating objections 135, 3314, 3445 & 3506)**

This site included all the land to the west of HH 04/04 between Carnreagh and Ballynahinch Road all the way out to Comber Road. In view of the modest amount of additional land required and the size of the town, we consider that the site is too extensive for inclusion within the settlement limit. The site is peripheral and not best
located for existing services. Development of the site would represent urban sprawl in one direction. The fact that the site is defined by roads does not compensate for the fact that it is too extensive. We consider that the same applies to site B of objection 135 and objection 3445, which comprise large parts of the north and south of 3503. These sites also extend to the Comber Road. We consider that they are individually too large to be included in the settlement limit. Parts of these sites would also be prominent and would detrimentally affect the setting of Hillsborough. Site 135 B consists of large fields that generally slope up from the road and so development would be prominent even if ridge heights were restricted. Site 3445 is a network of small fields in a rolling topography. The fields generally slope up away from the road and so development would be prominent. There is a good boundary defining the existing settlement limit and as a result the Governor’s Gate development is well-screened on this approach into Hillsborough. We consider that the sites are needed as a rural buffer between the Hockey Club and the settlement limit rather than the reverse as argued by the objectors.

Objection 135 site A is a smaller site of 4 fields to the south adjoining Ballynahinch Road. Objection site 3506 is two fields to the north of site A. We consider that these two sites are not acceptable for inclusion because of their peripheral location remote from the town centre. Both sites together would represent urban sprawl in one direction and would provide more housing than is required within the settlement limit. We consider that 3506 would be unacceptable in urban form terms because it would represent a protrusion of the settlement limit outwards in the middle of zoning HH 04/04, which would lead to an illogical limit. Development on the site would also be quite prominent in views from Comber Road. Whilst parts of site A (objection 135) would relate well to the existing limit, we would not favour its inclusion. The site is peripheral and too large. The portion of the site closest to the road slopes up to a crest before falling again to the rear. This would lead to a prominent development on the approach to Hillsborough along the main Ballynahinch Road after the junction with the Comber Road. The site would extend the development limit too far out into the countryside to the detriment of the setting of Hillsborough.

Objection 3314 relates to a small L-shaped site wrapped around a corner in the NE portion of Zoning HH 04/04. The site is mostly occupied by buildings. It represents a logical rounding-off of the limit that is not prominent and will have little effect on the development limit characteristics in this area. The site relates well to the adjoining zoning. We consider that it should be included within the settlement limit. The Department did not suggest any key site requirements and given the size of the site (0.4 hectares) we do not consider that any are necessary. In line with our conclusions on DOS in the Settlement Strategy Chapter of our report, we do not consider that this is a location that would warrant a DOS.

**Recommendation**

We recommend that objection site 3314 be included within the settlement limit for Hillsborough and added to housing zoning HH 04/04

We recommend no change to the Plan in respect of the other listed objections.
Lands north of Carnreagh (objection 3028)

The site only diagonally touches the settlement limit at the south western corner. There is no development north of Carnreagh at this location apart from farms and rural dwellings. The development of the site would not constitute rounding off of any kind. Rather it would be an illogical area of urban sprawl unrelated to the existing settlement limit. Expansion of this nature would be completely unacceptable. We recommend no change to the plan in respect of the objection.

Hillsborough South

Lands at Dromore Road (objections 3085 and 3379)

Objection 3379 originally included several parcels of land around the southern portion of Hillsborough settlement limit. The objection was reduced to a single site between Dromore Road and the A1 (north of the housing zonings on Dromore Road). The agents confirmed that the objections in respect of the other parcels of land were withdrawn. Objection 3085 is included with the remaining portion of objection 3379 and was presented and considered as part of that objection.

The site is quite prominent on the main approach into Hillsborough from the south. The southern end of the site is defined by the new grade separated junction and bridge over the A1. This provides a new vantage point for views of the site. The A1 is defined by mature landscaping along the site boundary. The adjoining housing zonings are on lower flatter land then the site rises up to the local crest provided by the A1. The site also rises up from Moira Road, which forms part of the north-eastern boundary. We are not persuaded of the need to provide more housing land in Hillsborough than the site we have already identified. We consider that this site is not suitable for development because of its prominent nature. The site is an important rural buffer between the new housing zonings and the A1. It reads as an important part of the rural setting of Hillsborough and is located on the very important main southern approach to the town. We reach this conclusion despite the Department’s concession at the inquiry. We do not agree that the exclusion of the identified “elevated” portions of this site addresses our concerns. The entire site is elevated in our opinion. We note that the settlement limit does not extend to the A1 for much of its length and we agree that this is the correct approach given the topography and the importance of Hillsborough Castle and grounds. For these reasons, we cannot agree with the Department that this site should be included in the settlement limit. We recommend no change to the plan as a result of these objections.

HOUSING ZONINGS

Zoning HH 04/03 & HH 05/02 – Dromore Road (objections 238 & 3536)

Objection 238 relates to the former petrol filling station site, which is shown as whiteland in the plan. The objection from BP Oil indicates that there is no intention to re-open the filling station and that the site should be included within the surrounding housing zonings. We agree and consider that any basis for retaining the site as whiteland has now gone.
Objection 3536 relates to site 238 and the land to the rear. The objection also seeks a housing zoning and DOS on the whiteland. We do not consider this to be an appropriate location for a DOS. Rather it should be zoned for housing as discussed above. The objection also refers to the key site requirements for zoning HH 05/02. No information was provided for this objection and we cannot consider it any further.

**Recommendation**

That objection site 238 is incorporated into the surrounding housing zonings.

**Zoning HH 03/04 – Former Council Offices, Park Road (objection 1392)**

The objection to the key site requirements has been overtaken by events. The Department were of the view that as the site had planning permission then the key site requirements were no longer necessary. We also note that the majority of the development has been completed. There is no need for these key site requirements.

**Recommendation**

That the key site requirements for Zoning HH 03/04 be deleted from the plan.

**HH 05/01 – Blundell Hill, Carnreagh & HH 12 Carnreagh LLPA (objection 407)**

This objection related to the principle of the housing zoning on the site and suggested that LLPA HH12 be extended to include the site. We consider that the site could be developed in a manner that would safeguard any important trees on the site, given that those trees are located on the periphery of the site. We do not agree that access to the site would be especially difficult. An access position at the crest in the road near the existing gate (SW corner) could provide well in excess of the necessary visibility splays. We would assess the site as having gentle gradients and could easily satisfy the requirements of PPS7, if developed for low density housing.

The important features of LLPA HH 12 are stated as:
- Locally significant buildings and their surroundings – a number of large houses set in the remnants of a planned landscape.
- We consider that the site together with the large detached dwelling to which it clearly relates (number 50) would sit comfortably into that definition. There are mature trees along the drive to no. 50 that echo those around the dwellings in the LLPA. We would support this element of the objection and recommend that the LLPA be extended to include the housing zoning. Designation as a LLPA does not preclude development. It would assist in addressing the objector’s concerns regarding the quality of development proposed. In this context we would recommend that the zoning is deleted and the site left unzoned. It could then be the subject of an application for low density housing, which would be more in keeping with the area.

**Recommendation**

We recommend that:
- Housing zoning HH 05/01 is deleted from the Plan.
- Designation HH 12 (Carnreagh LLPA) is extended to include the site.
Land at Culcavy Road (Objection 3317)

The objection relates to land within the settlement limit seeking its zoning for housing. The site has been developed as a housing estate (Blackberry Lane). There is no point in zoning it for housing in these circumstances.

URBAN ENVIRONMENT

Policy HH 14 – Hillsborough Conservation Area Additional Design Criteria

Objection 1392 related to Housing Zoning HH 03/04, which has now been largely built as noted above. The objection also referred to the additional design criteria and objected on the grounds that they are over-restrictive. We have recommended that Policy UE 2 related to additional design criteria for Conservation Areas is deleted from the plan. There should therefore be no additional criteria. In any event, no information was provided to justify the objection or clarify which criteria caused concern. In the absence of this information we could not have assessed the objection any further.
MOIRA

Objection to the settlement limit around Moira (objections 2471 & 3326)

One of the functions of the development plan is to provide for the growth of settlements commensurate with their position in the hierarchy and in accordance with the plan strategy based on the RDS. We consider that the designated settlement limit does allow for some future growth of the town in accordance with the plan strategy. There are several zoned sites that have not commenced development. We recommend that additional lands should be included to meet the needs of a longer period in line with our strategic conclusions in paragraph 3.2.75 of Part 1 of this report. We have addressed the strategic arguments related to the town’s identification for significant expansion in the RDS in this paragraph. We cannot therefore support the objection in general terms, but must rather deal with the individual suggested sites. In any event the objections do not identify any sites for inclusion to meet the perceived shortfall and so would have achieved nothing.

The Department conceded objection site 207, comprising nearly 4 hectares with a yield of around 100 dwellings. However, this objection has been withdrawn. It does provide an indication of the Department’s acceptance of peripheral sites to meet the housing land requirement. There is also a former factory premises at Meeting Street. We estimate the site area at around 2 hectares. This site has been cleared and could represent an urban capacity or windfall site.

We have endorsed the Department’s recommended overall figure of 936 to meet the HGI, but found the Department’s allowance for an additional 3-year supply to be too low. We considered that an additional 375 dwellings should be allocated to the STLR, which would allow for the significant expansion planned in the RDS. We must now consider which sites should be included in order to meet this figure.

Objections to the exclusion of lands from the settlement limit

Large site west of Moira (Objection 804)

This site is approximately 33 hectares in area. The large field at the southern end of the site is in Craigavon Borough and therefore it is not within the scope of this plan and cannot be considered. This reduces the site to around 22 hectares with a potential yield of around 550 dwellings. We consider that this is too extensive for Moira’s housing needs and would represent urban sprawl. However this area is not subject to any environmental Designations and development would have a limited effect on the landscape setting of the town. It is not open to us to reduce the extent of the objection site as submitted. We consider that the Department could look to this area to accommodate the STLR, should the need arise. We shall return to this point later.

Land north of Backwood Road (objection 472)

The site consists of two fields in agricultural use. The southern boundary of the site abuts Moira Demesne Park and residential properties. There is also residential development on the other side of Backwood Road. The Department’s reason for ruling out the site was that it is in LLPA MA06. There is no objection to the LLPA associated
with this objection. However, we still have to consider if the development of the site would affect the important features of the LLPA. The only one of relevance refers to Moira Castle Demesne. As well as the existing Public Park, it also refers to the surrounding farmland that retains a parkland appearance because of the mature trees dotted therein. This description does not apply to the site, which appears as conventional farmland. The only other consideration in landscape terms is the setting of the town from the M1 to the north. The site would appear quite prominent in these views. Development would be on the crest of a ridge and the proximity of the site to the Demesne would also result in it becoming closed in by development to the north. We consider that this would be detrimental to one of the most important parts of the landscape setting of the town. The existing housing on Backwood Road does not have this impact on the Demesne and it does not influence our consideration of the objection site. Our conclusion is that the site should remain outside the development limit.

**Lands at Drumbane Road (objection 3316)**

The objection site comprises three large fields to the north of the Moira Castle Demesne public park. It is largely defined by public roads and extends as far as the M1 to the north.

We consider that the site is too large for the town's housing needs that we have identified above. The development of the site would represent urban sprawl as it could accommodate 700-800 dwellings to the north of the town. The development of the most northerly field would bring the town right out to the M1 and would be very prominent on slopes leading down to the motorway. We consider that this would not be an appropriate form of development.

These three fields read as an attractive area of parkland with many mature specimen trees dotted within them. We consider that they do constitute an important landscape feature that makes a valuable contribution to the setting of the town. As such they are an important component of the extensive MA 06 LLPA. The adjoining public park and this site read as one entity on old maps. We consider that the LLPA designation on the site is warranted and that development of the site would be detrimental to these important landscape assets.

Moira Demesne SLNCI (MA 05/02) covers most of the site. The justification for the SLNCI is that it comprises reasonably species rich, self improved grass parkland with mature trees. The grassland is stated to be of more interest because of the extensive management regime. We accept that the site contains important parkland trees and associated grassland habitats. The objector did not explain why these trees and grasslands were not of sufficient interest as to be unworthy of designation as a SLNCI. The land is closely associated with the historic public park, which is also within the SLNCI. We were not presented with sufficient evidence to support the objection to the SLNCI designation on the site.

We conclude that the objection should fail and that the plan should not be changed in any respect as a result of this objection.
Land at Clarehill Road (objections 143 & 261)

The site was included in the extensive LLPA MA06 because it was part of the landscape setting of the town. The site cannot be ruled out merely because of its inclusion in the LLPA. The precise boundaries of the LLPA are open to debate as part of the objection process and in any event LLPA designations do not completely rule out development. We consider that the critical issue that emerged was the impact on views of St. John’s Church, which is a Grade A listed building. We have taken into account the objector’s offer to limit development on the site to single storey dwellings. We have examined the views that were identified for us in the submissions of the parties (oral and written).

The site is elevated and development will be seen from the surrounding countryside. This is natural given Moira’s location as a hilltop town. The site is seen against the backdrop of the town and particularly the development close by. This includes Berwick Heights, a large new Baptist Church and Henry Court (sheltered housing). The latter buildings are two-storey and in close proximity to St. John’s church. The church is a town centre building and is seen in the context of the built development of the town. The important view of the front elevation is safeguarded by the churchyard aligned with the Demesne. The Department identified the critical views being from Hillsborough Road and the M1 approaching the Moira junction. The existing buildings are in front of the Church in both those views. They screen the Church so that all that is visible is the Spire. The objection site is at a lower level than these buildings and so if development is restricted to single-storey it will have no more impact than the existing buildings. The views from the M1 are right angle views as one approaches the junction. Traffic is travelling at high speeds on the motorway in any event. The only clear view of the church from the south is along Clarehill Road. From here the church is very much seen in the context of the development all around. The development of the site would not therefore change the character of the setting of the church. We cannot agree that the listed building is a new factor that was not taken into account when the Commission recommended that this site be included in the settlement limit as part of the report into Lisburn Area Plan 2001. The setting of the listed building was an important material consideration then as it is now. We consider that the setting of the Church to the south/south-east is defined by the Baptist Church and Henry Court and that development of the site will not materially affect the setting any further than the existing buildings already have. Those buildings are not within the LLPA and we consider that it would be appropriate to remove the objection site from the LLPA as well. The LLPA is very extensive and removal of the site will not affect the features of interest any more than the exclusion of the Baptist Church and Henry Court has done. We note that the objector proposed boundary planting to assist in mitigating the impact of the development. As we consider that the site is acceptable in principle this planting is a factor that can be taken on board.

We consider that the site is partially in a notch in the settlement limit, close to the town centre. It relates well to the existing built form of the town. It will have a backdrop of development from surrounding views. We consider that it should be included in the settlement limit and zoned for housing. As we have discussed above the development should be controlled to restrict building heights and provide appropriate planting. We consider that these matters can be addressed by a concept plan, which will also address flora and fauna and watercourses. In this context we do not consider that a density stipulation is required. The only adjoining public highway is Clarehill Road and so its stipulation as the access is superfluous.
Recommendation

We recommend that the objection site should be included within the settlement limit and zoned for housing. We also recommend that the boundaries of Designation MA 06 be adjusted to remove the site from the LLPA. We recommend that the following key site requirements should apply:

- Development on the site shall be restricted to single-storey dwellings.
- A Masterplan addressing the relationship of the development to the nearby listed building (St. John’s Church) and the comprehensive landscaping of the site shall be submitted for the approval of the Department.

Land adjacent to Berwick Heights (objection 3330)

The original site was reduced to the field south of Claremont Park and west of Berwick Heights. This field slopes down from north to south and has residential estates on two sides and a bungalow on the third. We agree with the Department that the reduced site represents rounding off of the development limit. The site is seen in the context of the existing dwellings to the side and rear and so is not prominent. The Department confirmed that the LLPA designation (MA 06) should be removed from the reduced site. We agree with this conclusion.

The submission of a concept plan is a requirement of PPS7 and we see no need to go beyond this for such a small site. We have set out our approach to key site requirements at the start of this report.

Recommendation

We recommend that the reduced site as shown on the attached plan should be included within the settlement limit and zoned for housing. We also recommend that the boundaries of Designation MA 06 be adjusted to remove the site from the LLPA.

Lands south of Main Street (objections 2958 and 3218)

These objections both related to land north of Magherahinch House and farmyard. Objection 2958 also included a triangular piece of land to the west of the farm buildings, between them and zoning MA 04/09. The sites lie within LLPA MA 06, which is also the subject of the objections. In terms of urban form, the sites lie within a notch in the development limit close to the town centre. Access is available from the adjoining housing zonings.

The issue to be considered is the impact of development on either site on the LLPA. The designation of MA 06 on page 156 of the plan lists the key features of the LLPA. The features around the site that are mentioned are Pretty Mary’s Fort (a scheduled rath to the south west) and the River Lagan corridor in terms of the local nature conservation interest of the river and wetlands. The development of the site would not impact on the river corridor. There is a completed area of housing immediately adjacent to the rath (zoning MA 04/09). This development includes a line of houses that screen the site from the rath. There was reference to the wider setting and connections to other monuments. The only other monuments that we can detect on the plan maps are...
well within the existing built-up area of the town and are not intervisible with Pretty Mary’s Fort. We cannot therefore visualise how the development of the sites would impinge on the monument, given the existing development of the town.

The important features of the LLPA include the following listed buildings St. John’s Church, Berwick Hall and the disused lime kilns on Clarehill Road. The Department has allowed development within the LLPA immediately adjacent to the limekilns on zoning MA 03/02. There is no reference to Magherahinch House, despite the fact that it is a listed building in the LLPA. The Department’s explanation was that this was an omission by mistake because this is a large LLPA. We find this explanation difficult to accept because there are only 4 listed buildings in the LLPA notwithstanding its size. If it was of such importance then it surely would have been mentioned in the designation. However, it is a listed building nonetheless and the impact of development on the setting must be considered.

The listed building is seen surrounded by development to the north and west when viewed from distant views to the south or south-east of the town. We note that Zoning MA 04/06 has not been developed yet. This will bring housing development close to the listed building. The house sits at a lower level with a large complex of modern agricultural buildings and paraphernalia to the rear. The house is orientated east-west and already seen in the context of the existing residential development and the large and unsightly buildings to the rear. We consider that objection 3218 could be developed in a manner that would not impact any more on the setting of the listed building than the existing development. A strong buffer of planting along the southern boundary would separate it from the farm complex. Development at the eastern end of the site closest to the listed building could be restricted. Existing trees can be retained – there are only two on the boundary with MA 04/06 in any event.

The Department conceded the removal of zoning MA 03/02 and other successful objection sites from the LLPA because they were or will be developed for housing. We consider that this situation also applies here and the objection site 3218 should be removed from the LLPA MA06. The site is surrounded by new housing zonings and separated from the listed building and the remainder of the LLPA by large agricultural buildings. The site therefore makes little contribution to this extensive LLPA.

We consider that the remainder of objection site 2958 (outside 3218) should remain outside the settlement limit. This part of the site slopes down to the rear of the farm buildings. There are no physical features on the ground to define this triangular area other than the boundary with MA 04/09. Maintaining this as an open agricultural field would preserve the gap between the house and buildings and the residential development to the west. It would also ensure that no more development is anywhere near the rath.

We consider that a Masterplan for the development of the site can address the issues of relationship of development to the listed building, landscaping, retention of vegetation and access. Transport assessment and archaeological assessment are required by regional policy. Retaining structures should be considered as part of the development management process.
**Recommendation**

We recommend that the objection site should be included within the settlement limit and zoned for housing. We also recommend that the boundaries of Designation MA 06 be adjusted to remove the site from the LLPA. We recommend that the following key site requirements should apply:

- A Masterplan showing the following matters shall be submitted for the approval of the Department: the relationship of the development to the adjoining listed building – Magherahinch House, the provision of buffer planting to the southern and eastern boundaries of the site, the retention of existing vegetation within the site or on the boundaries, access from the adjoining housing zonings and housing density in the range of 15 to 25 dwellings per hectare.

**Housing Zonings**

**MA 04/07 – land adjacent to 41 Old Kilmore Road (objection 3244)**

This was an objection to the zoning for housing and the land’s inclusion in the settlement limit. Given the recession in the housing market, it is difficult to conclude that the failure to commence development on the site is as a result of land banking. There is little ongoing development in the country due to this recession in the housing market. We cannot recommend the removal of the zoning on this basis. There is scope for objection sites to be included within the limit and we have so recommended above. These lands are only marginally further from the town centre and shopping or other facilities than other zonings or many objection sites. We cannot therefore recommend that it be excluded for these reasons either. We consider that the plan should not be altered as a result of this objection.

**MA 03/02 – Land Opposite 16 Clarehill Road (objections 1469/6 & 1586/9)**

These objections to the principle of the zoning are now without basis as large parts of the development are complete, including the portion nearest the listed building (the lime kilns), which was the objectors’ main concern. The Department suggested that the entire zoning should be removed from the LLPA MA 06 – Moira Castle Demesne. We agree with the Department’s position in the light of the development of the site, with the exception of the lime kilns, which should remain in the LLPA.

**Recommendation**

We recommend that zoning MA 03/02 with the exception of the listed lime kilns in the north east corner is removed from LLPA MA 06.

**MA 04/02 – Rear of 2 Lurgan Road (objection 3257)**

**MA 04/04 – Main Street, Moira (objections 3254 & 3833)**

**MA 04/06 – West of Claremont Crescent (objection 3248)**

**MA 04/09 – East of Waringfield (objection 3250)**

Objection 3833 related to the key site requirements and not the zoning itself as classified by the Department. We were not assisted by the Department’s statement of
case, which failed to address the objection to key site requirements at all. We consider that the base map should be updated to show the roundabout serving the completed new development adjoining the site. The objectors are quite right that access to this zoning may not be from MA 02/08 because a new access road has been constructed through MA 04/04, which is obviously available to serve that zoning. We have considered density key site requirements in our general section and concluded that there is no need to specify density for this type of zoning. There is no requirement for a roundabout in any key site requirements and so we cannot see the objector’s point in this regard. The Department accepted that there was no need for a transport assessment for these zonings. We have addressed the landscaping key site requirements in our general section and concluded that they are not necessary. Flood risk assessment is covered by regional policy and so does not need to be stated here. We consider that the overhead lines affecting MA 04/06 are obviously a matter that would have to be addressed in the design and layout of any scheme. This does not need to be spelt out as a key site requirement. The Department accepted that as development on MA 04/09 was complete there was no need for key site requirements for this zoning.

**Recommendation**

We recommend that the key site requirements for zonings MA 04/02, MA 04/04, MA 04/06 and MA 04/09 be deleted from the plan and that Map 5/001 is updated to show the roundabout at the access to these zonings.

**CONCLUSION ON HOUSING LANDS**

The Department’s figure of 931 in the June Paper comprises the zonings within the Plan plus objection site 3330. This left a shortfall of 63 dwellings in order to meet the HGI. We have recommended the inclusion of objection sites 143 and 3218. These sites could accommodate around 110 dwellings. These three sites would meet the revised HGI with a surplus of 43 dwellings. The need we identified to meet the STLR left an overall shortfall of 438 dwellings. This leaves a shortfall of 328 dwellings to be accommodated as the STLR for Moira. We consider that the best option to accommodate these dwellings would be part of objection site 804. The portion of the overall site within the Plan area could yield 550 dwellings and so only part of the site would be required.

A reduced site has not been presented to us for consideration and we are therefore unable to make a recommendation on the basis of part of the objection site. The Department may be in a position to give consideration to part of the site for the land reserve and, if so, in our view it should examine the areas closest to the existing settlement limit. The fields to the east of Zoning MA 04/08 are quite well screened by the roadside dwellings in front, by vegetation and by the topography. The fields closest to Old Kilmore Road are reasonably flat and could integrate with future development on Zoning MA 04/05.
OTHER OBJECTIONS

MA 06 – Moira Castle Demesne LLPA (objection 3326)

This objection was not supported by any evidence stating why the LLPA was not justified. The LLPA relates to the setting of the town including the demesne parkland, slopes down to the river and several listed buildings. We consider that it is warranted in principle. We have considered several site specific objections to its extent above and recommended that several portions be removed from the LLPA. This does not denigrate from the overall LLPA designation, which we consider to be appropriate.

MA 09 – Lurgan Road LLPA and Policy MA 11 – Moira Conservation Area Additional Design Criteria (objection 3833)

The Department consider that the features contributing to the designation of this small LLPA have been lost to the development of the roundabout and development associated with the conversion of the old rectory to a crèche. They therefore recommend that the LLPA should be removed from the plan. We agree with their assessment. This would address the objectors’ concerns.

The objection refers to “MA 06 Moira Conservation Area section 4 bullet point one – no new structures will be allowed to impinge on views of St. John’s Church.” We cannot find the wording that the objector has referred to in respect of Moira Conservation Area in the Plan. There is no reference to the matter of views from or to St. John’s Church in Policy MA 11 or Policy UE2 or UE3. We cannot find this reference in the Conservation Area Design Guide either and are at a loss as to the source for this concern. There is no further comment that we can make on this element of the objection.

Recommendation

We recommend that Designation MA 09 – Lurgan Road LLPA be deleted from the plan.

Objections regarding Traffic Problems in Moira Area and the failure to indicate a Moira By-Pass (Objections 700 and 3839)

The objections related to traffic problems in Moira caused by through traffic from surrounding settlements and Lurgan. The suggested solutions were a new junction on the M1 between the existing Moira (J9) and Lurgan (J10) junctions or a by-pass. A possible route from the M1 junction around the south of Moira to the west end of the development limit was indicated. No evidence was supplied to justify the proposal, indicate how it would be funded or what the benefits of the scheme would be. We consider that these matters are objections to BMTP and the RTS and as such are outwith the scope of this inquiry. We appreciate that there is significant growth in Moira and surrounding area but the issue of a new junction on the M1 in the location specified is outside the plan area and cannot be considered further. The Department did indicate to the inquiry that the focus for road improvements was the strategic highway network and the emphasis was on a modal shift to public transport rather than building new roads. The traffic safety issues in Moira had been considered and junction improvements had been programmed, we were informed. We agree with the Department that the answer to these problems lies in a modal shift to public transport rather than further new roads. Moira has a railway station, as do the towns to the west
such as Lurgan, and so is well served by public transport. We would not therefore support the objections and recommend no change to the Plan.
LISBURN VILLAGES

General Objections to the Settlement Limits of Villages
(Objections 1705, 2424, 2427, 2499, 2503, 2514, 2520, 2526, 2532, 2537, 2547, 2551 & 3323)

Elevate made objections to every village settlement limit. We propose to deal with them generically in this section. The rationale for each settlement limit is set out in the relevant section of the Plan. The RDS in chapter 8 at SPG-RNI 3 states that within the BMA the strategy is to consolidate villages and resist their large-scale expansion. We have recommended that the limits of villages are strictly controlled in Part 1 of our report with several exceptions related to small scale expansion of certain villages for particular reasons. We cannot therefore agree with the generic argument that the settlement limits are too restrictive. We consider that the limits generally allow for sufficient growth in the context of villages being towards the bottom of the settlement hierarchy and that there are opportunities for further development within limits. Many of the villages have few facilities and are in remote locations and so rank lowly for accommodating increased growth. The objections did not specify any sites for inclusion and therefore we cannot consider the inclusion of any land as a result of these objections anyway. We shall consider the individual site specific objections received below. We recommend no change to the plan as a result of these objections.

AGHALEE

Lands to the west of Beechfield Lodge (objection 207/2)

The objection originally included two large fields West and North West of Beechfield Lodge. The site was amended at the inquiry to the southern field and a portion of the northern field. The original site was over 8 hectares and even the reduced site would still be of the order of approximately 6 hectares. This would yield 120 – 150 dwellings, which would be well in excess of the needs of the village. There were no environmental concerns expressed by the Department and we are convinced that any access difficulties could have been resolved. However, we consider that the site is too large and would constitute sprawl rather than compact village form. We appreciate that this is the only objection site and that most of the housing sites have been developed. There is some land within the existing limits that could be developed. We note that Aghalee expanded dramatically in recent years in any event and had a population of 771 in 2001. There is no requirement that it should continue to expand at this rate. We cannot agree with the proposition that a site should be included, no matter how large, just because it is the only site. The site is too large to constitute rounding off. We therefore conclude that the plan should not be changed as a result of this objection.

ANNAHILT

Introduction

There are few facilities in the village and so it ranks relatively lowly for accommodating increased growth. We note that the former rope factory has been demolished and that residential development is underway on the site. The site extends to several hectares and should accommodate the development necessary to meet the future needs of the
village. It does not appear to have been taken into account in the Department’s estimates of housing yield in either the technical supplement or June paper. In this context we consider that the current development limit is broadly adequate.

Lands at Glebe Road (objection 604)

The site is relatively open to view on the approach from the north along Glebe Road. The existing development limit at the roadside is defined by trees and hedging. The site rises gently to the west and is defined to the north by a lane leading to a farm. We consider that the site is not acceptable in terms of urban form. It would extend development along Glebe Road. The plan states that the limit has been drawn to prevent ribbon development along Glebe Road. We consider that inclusion of the site would constitute urban sprawl in an undesirable direction. The boundary definition would not be any better if the site were to be included. If the lands edged blue are taken into account, they relate better to the existing village form. However, the resultant site would be too large for the needs of the village. The granting of a Certificate of Alternative Development on the site in 2003 is irrelevant because it is not a planning permission and does not commit the Department to include these lands in the development limit. We recommend no change to the plan as a result of this objection.

Lands at Ballynahinch Road (objection 3323)

This is an extensive site (7.6 hectares) to the west of the village. The site is quite prominent to views from the road because it lies at a lower level and the hedge along the roadside of Zoning AT 02/01 has been removed. Parts of the site are elevated in this rolling landscape. We consider that the site is too large and would represent unacceptable urban sprawl. The development would be prominent and could result in the loss of mature vegetation to the detriment of the landscape setting of the village. We consider that the entrance to the village is defined by the Orange Hall with a definite break from rural to urban provided by the site and then the hall. We have stated that there is no need for large scale expansion beyond the limit in the plan and so this site is too large in that regard also.

Part of the site is within Ballintagh Pond Carr SLNCI (LN 01/05). This area has been designated because it contains a pond, wetland, mature trees and areas of Carr willow. The objection does not state the basis for removal of the designation or any information as to why it is not worthy of being designated. We consider that this is clearly an area of local nature conservation interest and should remain so designated in the plan.

We recommend that there should be no change to the Plan as a result of the objection.

Lands South of Annahilt (objection 137)

This extensive site was reduced in the statement of case to two smaller sites, which we shall consider below.
Site A – South of Kernoghan Park/River Dale

This site was further reduced at the inquiry and now represents a notch in the development limit south of the established housing areas of Kernoghan Park and River Dale. The site is in a flat landscape with rising ground to the rear. The site would be seen in the context of the existing housing in views from Magheraconluce Road and with the backdrop of housing and rising ground. The existing limit is partly defined by the Ballynahinch River and by the rear boundaries of the dwellings in Kernoghan Park. The proposed limit does not have any physical definition on the ground. However as the site represents rounding off and is not prominent, this is not fatal to the objection. Our strategic conclusion was that little additional land was required to be identified in the villages to meet the revised HGI or STLR. We therefore consider that the site should not be included in the settlement limit or zoned for housing.

Site B – Land at Woodfall Manor

This is a small strip of land adjacent to the south-western side of Woodfall Manor. The road serving Woodfall Manor runs along the site. This is quite a wide road ending in a turning head from where a lane runs south to serve dwellings in the countryside. Whilst the site is elevated on the side of a small ridge, it could clearly be developed as an extension of the existing dwellings on that side of the road to match the existing dwellings on the other side as far as the turning head. We consider that it would constitute small scale rounding off and should be included in the settlement limit. We do not consider that it should be a housing zoning because of its small size.

Recommendation

We recommend that objection 137 site B is included within the settlement limit.

Lands north of Ballynahinch Road (objection 726 – sites A, B & C)

Site A

The site is elevated above Ballynahinch Road and slopes gradually down to the north, but it is screened to views from the road by new dwellings constructed on the road frontage to the south. The Rocklands housing development lies to the west. Views from there are screened by the dwellings and garden vegetation. The field boundaries on either side are defined by hedges. The northern boundary is undefined and the site does not extend eastwards sufficiently to reach housing designation AT 03/01. There is a small field in between and so the objection does not completely fill the notch in the development limit in this area. However, we consider that the site is acceptable in terms of urban form and relates well to the existing development. There are no significant views of the site from public vantage points. Access is potentially available from Rocklands (there is a turning head adjacent to the site boundary). However, our strategic conclusion was that little additional land was required to be identified in the villages to meet the revised HGI or STLR. We therefore consider that the site should not be included in the settlement limit or zoned for housing.
Sites B & C

The southern portion of Site B is within the settlement limit and so the objection to this part of the site is superfluous. We shall consider these sites together as they are adjoining. They are open to view from Ballynahich Road and defined by low hedges for the most part, although the northern boundary of site C is undefined. The sites would extend the development limit to the north towards the sewage treatment works. We do not consider that they represent rounding-off or infill. Development would be reasonably prominent to views from the main road even if designation AT 03/01 were developed. We consider that the lack of definition of the existing limit crossing site B is countered by the lack of a northern boundary to site A. As a consequence, there would be no advantage to the inclusion of the site for development limit characteristics. There is no requirement for additional land in the village and the nature and position of the site is such that we recommend no change to the Plan as a result of this objection.

Objection to Housing Land Use Policy Areas, Annahilt

Designation AT 02/01 Ballynahinch Road (objection 3310)

This objection related to the key site requirements for the designation. The Department confirmed that planning permission had been granted on the site and in the light of this permission that the key site requirements should be deleted. We agree with this assessment.

Recommendation

We recommend that the key site requirement for Designation AT 02/01 be deleted from the plan.

DROMARA

Lands at Begny Hill Road (objection 3429)

The site comprises a field to the south of the road. The field slopes up to the east and south. Development on the site would be prominent, particularly on the approach into the village along this road. We consider that the inclusion would extend development along the road on one side of the road. It would not consolidate the settlement and would not constitute a logical rounding off. We consider that the field is not acceptable for inclusion within the settlement limit because of the urban form factors and prominence of the site.

A small part of the site lies behind the former dwellings adjacent and within the limit. This part of the site appears to be separate from the field and defined by trees. It would be logical for this small part of the site to be included within the limit as it constitutes a small notch in the limit and appears to logically relate to the adjoining site. This site has planning permission for residential development. However, the objection site cannot be
amended at this stage in the development plan process. We therefore recommend no change to the plan as a result of this objection.

**Lands at Dundrum Road (objection 2797)**

The original objection was reduced further at the inquiry to comprise two fields to the north of Dundrum Road at the eastern edge of the village. The field slopes up from the road and then levels off somewhat. The roadside hedge does not screen the site and other field boundaries are low. Development would therefore be quite prominent. In terms of urban form the site would extend the village to the east and would not constitute rounding-off. The village form in this locale is quite linear with limited depth to both sides of Dundrum Road. The inclusion of the northern field would extend development to the north beyond the existing limit. We consider that both fields together and the roadside field singly would be unacceptable as additions to the village because of urban form factors and the prominence of the site. The roadside field cannot be considered to be a notch in the development limit by any stretch of the imagination. The eastern edge of the village around DA 03/03 on the opposite side of the road is well-defined by mature trees that also screen the adjoining farmstead. We do not consider that there is an abrupt edge to the village at the moment. The adjoining dwellings are at a very low density and set well back off the road. We consider that this provides a transition from the countryside into the village. The hedge that defines the settlement limit is also of good quality and considerable height to the edge of the northern field.

We recommend no change to the Plan as a result of this objection.

**Lands at Moybrick Road (objection 697)**

The site was reduced at the hearing to one field. This field is defined on two sides by existing development. The remaining boundaries are defined by the river with vegetation along both banks and the road with hedging. The site is flat and development would not be prominent. The entire site is within an LLPA in the plan. However, at the hearing the Department’s expert witness confirmed that this could be reduced to an 8-10m strip along the river. The feature of interest is the river corridor. The objector pointed out that this would tie in with the LLPA boundary on the other side of the road is well-defined by mature trees that also screen the adjoining farmstead. We agree with this assessment. We consider that the remainder of the field makes little contribution to the large LLPA. There is quite a hard urban edge to the village in this location and the new dwellings around the site are open to view. The site is also being used for the open storage (or dumping) of agricultural machinery, etc. This presents an unattractive appearance.

We consider that the site lies into the settlement limit with new residential development on two sides. The remaining boundaries are very well defined by the river and road. The site constitutes a modest expansion of the village but is not required to meet the HGI. We consider, however, that the site should be placed in the STLR to meet the needs of the village beyond the end the Plan period. The LLPA related issue has been resolved as discussed above. It was confirmed that access can be gained from the adjoining Woodvale development and so the rural character of Moybrick Road and the vegetation thereon can be safeguarded. The development of the site would also present an opportunity to improve the appearance of this part of the outskirts of the
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village. We consider that the LLPA should be supplemented by additional planting to the riverside boundary in the particular circumstances of this site. We agree that any marginal flooding issue is covered by regional policy and can be addressed as part of a planning application.

**Recommendation**

1. We recommend that the site as shown on Plan 8 is suitable for housing and should be held in the short term land reserve to meet housing needs beyond the end of the Plan period, if required. Development should be subject to the following key site requirements:

   - Access shall be from Woodvale.
   - A 10m landscape buffer shall be provided along the southern boundary of the site with the River Lagan.

2. We recommend that LLPA designation DA 05 Banbridge Road be removed from the site shown on Plan 8 apart from a 10m wide belt along the boundary with the River Lagan.

**OBJECTIONS TO HOUSING LAND USE POLICY DESIGNATIONS**

**DA 03/02 – Hillsborough Road (objection 396)**  
**DA 03/04 – Moybrick Road (objection 393)**

Both these objections related to the first key site requirement of each designation i.e. the density of dwellings on the site. The agents commented on other key site requirements in the statements of case. We cannot address these comments as they are outwith the scope of the original objections, which made it clear that they only related to the first key site requirement. We have made general recommendations to the Department on key site requirements that may address the agents’ concerns in this regard.

The purpose of the density key site requirements were described by the Department as providing an indication of the yield from each site. We have clarified that we consider that there is no need to specify the density when it is in the standard range of 25 dwellings per hectare. This applies to DA 03/04 and we recommend that the density key site requirement be deleted. DA 03/02 specifies a density of 4-6 dwellings. The Department did not justify these figures in their statement of case and stated that any proposal that satisfied regional policy would be approved. In this evidential context we consider that the key site requirement could also be deleted for this designation also.

**Recommendation**

We recommend that the first key site requirement of designations DA 03/02 – Hillsborough Road and DA 03/04 – Moybrick Road related to housing density be deleted from the plan.
EMPLOYMENT ZONING DA 04 – RATHFRILAND ROAD (objection 3544)

The parties agreed that the proximity of residential properties and the need to provide access to the new dwellings and the river meant that a mixed use zoning would be more appropriate. They had agreed that a 60:40 split dwellings to employment as meeting the employment needs. The evidence was that the RDS advocated the provision of employment opportunities in remote locations. Dromara is not exactly remote but is peripheral in terms of Lisburn City and Banbridge. The plan strategy states that land is zoned in Dromara and Glenavy to serve the outer rural areas of Lisburn. Whilst the Department was satisfied that 40% of this site would be sufficient to meet the employment needs of the village, we are not convinced. We are aware that the Department allowed residential development on the former factory at the junction of the Moybrick Road. These dwellings are now complete. This was the only employment site in the village and the Department were content for its re-development. The loss of more employment land cannot be justified. There are also limits on the extent of additional housing land that is required in the village. This is an extensive site and 60% dwellings would represent too much housing growth. In this context we consider that the split should be 50:50 employment to dwellings.

In terms of key site requirements: the form of development, landscaping and access for the various components can be addressed by a Masterplan. We consider a buffer of 10m to the river to be essential as this is a designated LLPA. Transport assessment is a requirement of regional policy and will address highway improvements and pedestrian and cycle links. The list of acceptable uses on employment sites is in the strategic employment chapter of the plan. The Department provided a plan that excluded a site on the southern edge of the lands with planning permission for a single dwelling from the zoning.

Recommendation

We recommend that Zoning DA 04 as shown on Plan 9 be changed to a mixed use zoning with the following key site requirements:

- Development shall be carried out in accordance with a concept masterplan for the site, which shall address the form of development, landscaping of the site and the relationship of dwellings and employment uses and between the development and existing dwellings.

- Development shall comprise residential and employment uses in the ratio of 50% residential to 50% employment.

DRUMBEG – See Lagan Valley Regional Park Volume
DRUMBO

Land between Drumbo Road and Back Road (objection 178)

The site is a large field (over 4 hectares in area) to the south west of the village within the Drumbo LLPA (DO 04). The LLPA was not referred to in the objection letter. The letter refers to the inclusion of the site in whole or in part as outlined in previous correspondence. The previous correspondence was not supplied and we have no information as to what part of the site was suggested for inclusion. We can therefore only consider the whole site and reach general conclusions.

The site slopes up from Drumbo Road to Back Road. There is no development on this side of Back Road once past the School. The development of the site would not represent small scale rounding off or infill. Rather it would extend the village form considerably to the south and west. This would be the case whatever part of the site was developed. Development would be prominent in views from Drumbo Road and would be unacceptable in relation to scale and landform.

We recommend no change to the Plan as a result of this objection.

GLENAVY

OBJECTIONS TO THE SETTLEMENT LIMIT

Response to Counter Objectors Issues

The counter objectors make many points in relation to all the objections related to Glenavy. We shall address the general points in this section rather than repeat them for each objection site. An excluded site will always fall outside the development limit and so an objection on this basis that the site is outside the settlement limit as shown in the Plan is a tautology. The Department has withdrawn the Green Belt designations with the adoption of PPS21. Allowing more development could be argued to be necessary in order to support new community facilities. The Department should seek to ensure that new development is compatible with the village identity as part of the development management process. Employment land has been allocated within this plan. The village was allowed to grow because it was served by rail and bus. We note the point made that the rail service no longer operates. This is a factor in our conclusion that the existing settlement limit is broadly adequate for the plan period and beyond. All villages in the BMA are within the Belfast travel to work area. We cannot endorse a ban on all new development for this reason alone. Major growth has been directed elsewhere in Lisburn City area. The traffic issues are related to development that either has already taken place or is designated for housing in the plan. There are no objections to these designations. Similarly, the only objection to GY05 (2997) has been withdrawn and so the counter objections are deemed to be withdrawn also. Reference to designations in counter-objections cannot constitute an objection, as it was not submitted within the statutory period.
Lands to the east of Moira Road (A26), North and South of Johnston Park  
(Objections 72, 318, 319 & 3437)

We consider that the A26 Moira Road presents a very strong defensible boundary to the east of the main village. We consider that the inclusion of Johnston Park does not justify the inclusion of further agricultural lands or single dwellings within the limit. Johnston Park is a long established estate of dwellings and was included on this basis. The village centre and all the other development is on the other side of the main road. Further development on this side of the road would relate poorly to the existing village form and be contrary to the aims of compact urban form and avoiding ribbon development along roads. We agree with the Department’s assessment that the proposed sites are not acceptable in terms of urban form for these reasons. This is unrelated to the size of the objection site but rather relates to its location. We also agree with the counter objectors that the inclusion of these sites would effectively lead to the creation of a new settlement. We acknowledge the presence of a footbridge at Johnston Park, but this does not over-ride the fact that the A26 is a major boundary between the sites and the village centre. We do not consider that the development of the sites would lead to new shopping facilities being provided on this side of the A26. The sites are of insufficient size to generate the demand that would be necessary. It would not restore balance to the village. None of the individual circumstances raised outweigh our conclusions. Several of the sites are large and well in excess of the land required to meet the housing needs of the village. We recommend no change to the Plan as a result of these objections.

Land north of Belfast Road (Objection 3842)

The site lies within Antrim Borough and is outside the plan area. We cannot therefore consider the objection. We note that the Department considered that the site was not suitable for inclusion within the settlement limit.

Land at Glen Road (objection 250)

This is a large site to the west of Glenavy south of the Killultagh development of new dwellings. The northern boundary is defined by the rear of the adjoining dwellings. New planting has been undertaken along this boundary. The southern boundary is defined by a small stream. A driveway bisects the site, which is well-defined by hedges and some trees. The site is relatively flat with rising land to the south and east. The site forms an attractive rural approach to the village before the new development is reached around the corner. We consider that Glen Road is not the optimum location for further development because of its location separated from the village by the railway line. This front portion of this site is partly open to views from the road. The site is also too large for the needs of the village at 8 hectares. The inclusion of the site would not relate well to the existing village form and would represent excessive growth in an inappropriate direction. We recommend no change to the plan as a result of this objection.

Land at Pigeontown Road (objection 251)

This site extends from Crumlin Road to the west as far as the rail line. On plan it appears as a large indentation in the settlement limit. The land slopes up from the Pigeontown and Crumlin roads and then levels off. The plan designates a LLPA in this area. The key features of this LLPA are Glebe House (which is located away from the site) and Sentry Hill. Sentry Hill is within the site and the important feature is listed as
the strong line of trees running from north to south. This objection does not refer to the LLPA and there are no other objections to the LLPA.

We consider that the site as indicated in the objection is too large to meet the identified needs of the village. The development of the entire site would also prejudice one of the key features of the LLPA, i.e. Sentry Hill. For these reasons we consider that the site is not suitable for inclusion.

We recommend no change to the Plan as a result of this objection.

Designation 03/01 – Housing, land south of the Grange (objection 1586/10)

This objection to a housing designation in a LLPA (GY 07) has failed to recognise the facts. The plan states that no key site requirements were attached to the designation because work had commenced on site. That is why the listed building was not mentioned. The dwellings have been constructed and so there is no basis for this objection.

EMPLOYMENT

Land at Gobrana Road (objections 45 & 46)

The original objections were to the exclusion of the site from the development limit. However, they did refer to the adjoining zoning for employment (GY05), stating that as owner of GY05, the employment zoning was fully supported. The plan accompanying the original objection identifies the site and states that it should be included in BMAP 2015 for industry. The statement of case clearly sets out the intention of the objections, which is to include the land within the limit for employment purposes in conjunction with the adjoining zoning GY05. The Department has considered the site as suitable for housing and included it to meet the housing need of the village. We do not accept this approach, which goes beyond the scope of the original objection. We shall consider the matter on the basis of the original objection and submissions as seeking only an employment zoning for the site. There is an indication in the statement of case that the entire field could be considered for inclusion. We can only address the objection site as identified in the original objection.

There is no objection to GY05 (objection 2997 was withdrawn) and the Department and counter-objectors considered that this zoning was sufficient to meet the employment needs of the village. No evidence was supplied to support this assertion. The plan states at Parts 1-3, Volume 1, page 59: the plan proposals facilitate employment/industrial development in towns, villages and in the rural area. The plan states that Glenavy and Dromara have employment zonings to serve the outer rural areas of Lisburn District. We have no objection to this strategic allocation and no basis to challenge it, bearing in mind the Department’s duty to provide a generous and continuous supply of land for employment purposes in line with the strategic planning guidelines of the RDS. The objector also refers to the key role to provide a generous and continuous supply of land for employment purposes and to promote a balanced portfolio of employment sites of varying sizes in a range of locations across the plan area.
The question therefore is whether Zoning GY 05 is sufficient to meet the needs of outer Lisburn District. We consider that this is purely a question of principle. The Department accepted that there are no site-specific concerns with the site and recommended that it be included for housing purposes. The only need for the additional land identified in the objection relates to a small coal/fuel distribution plant owned by the objector. This currently operates from a restricted site in the countryside nearby and the objection site represents an opportunity for this business to re-locate. There is no explanation of why the business cannot be accommodated on the existing zoning, which extends to 6.3 hectares. There was no evidence of any other need for employment land to justify the inclusion of the site (2.5 hectares). The existing Zoning has not been developed despite (or perhaps because of) the closure of employment uses in the village. We consider that the Zoning GY 05 is sufficient to meet the strategic need identified by the Department. The evidence of the need for additional land was unconvincing. The inclusion of the site would not provide a logical settlement limit because it would lead to a protrusion into the countryside. We recommend no change to the Plan as a result of this objection.

URBAN ENVIRONMENT

Designation GY 08 – Glenavy Area of Village Character (AVC)

Objection 2226 sets out a cogent argument for the inclusion of nos. 10, 12 & 14 Crumlin Road and some areas of open space nearby within the AVC. No. 14 was formerly Glenavy National School (1908) and no. 10 was the schoolmaster’s house. This objection is supported by the Glenavy residents. Objection 1469/7 did not identify the site that was recommended for inclusion.

We agree that nos. 14 and 10 are older buildings of character. The older dwelling at no. 12 has been replaced with a new house, which does not respect the character of those on either side in terms of finishes but does in general form and siting. We would agree that the old national school does represent the northern end of the village given its age and corner location. We consider that these buildings are as worthy of inclusion as the old demolished garage across the road. Two of the areas of open space are actually new dwellings and their gardens, which do not merit inclusion in the AVC. The third area is on the corner of Gobrana Road. It is surrounded by mature vegetation, but is separate from the buildings referred to in the objection and the remainder of the village (as defined by the objector) and should not be included.

Recommendation

We recommend that the area identified on Plan 10 in red be included within Designation GY 08 – Glenavy Area of Village Character.
LOWER BALLINDERRY

Lands north of Lower Ballinderry Road (objection 3460)

This objection identified a field to the west of a farm group called Rosetta. This field is detached from the settlement limit. The objection does refer to including the land to the immediate west of the identified site. We shall consider the objection on that basis. It therefore comprises the two fields between Ashcroft and Rosetta. We consider that the inclusion of the site would lead to excessive growth in one direction. It would not be acceptable in terms of urban form either, as it would constitute a long projection of the village eastwards. We note that a single dwelling has been constructed on the eastern portion of the site.

The objection did not state the basis for opposition to LLPA LB 07. This LLPA only relates to a local watercourse and is very restricted to include only this feature and its banks. We consider that the LLPA designation is justified in the absence of any analysis to the contrary. We recommend no change to the Plan as a result of this objection.

Lands south of Ashcroft Close (objection 1806 – site A)

The objection requested that two parcels of land be included within the settlement limit. We consider site A at this juncture. This small field is enclosed on 3 sides by the existing settlement limit and therefore its inclusion would round-off the development limit. The site slopes down from the road towards Ashcroft Close. Part of the roadside boundary is defined by a hedge. The development of the site would relate well to the existing dwellings to the north and would be separated from Ballinderry House and LLPA by the road. The site is such a notch in the development limit that its exclusion would be illogical. We therefore consider that the site represents a logical rounding-off of the settlement limit and should be included within the village.

Recommendation

We recommend that lands forming objection 1806 – site A should be included within the settlement limit.

LANDS SOUTH OF LOWER BALLINDERRY

Objection 3529

We consider that this site is too large for inclusion. It would provide for too many dwellings; more than the needs of the village for the plan period and three or five year flexibility. This site would constitute urban sprawl to the south of the village. The portion to the south of Ballinderry House is well screened to views from the road. However, development could impact on the LLPA and listed building (Ballinderry House) and grounds. In any event it was not subject to a separate objection. One cannot exchange a housing designation in Upper Ballinderry for this site. Upper Ballinderry is a different settlement and there is no comparison in the size of the sites. We shall consider the other individual components of the site below as they are subject to other individual objections.
**Objection 3029**

The site is a field (an area of grassland) to the south east of the village. The north-west corner of the site is within the settlement limit and contains a large dwelling. We consider that the inclusion of the remainder of the site would not be acceptable. It is open to views from the east on the main approach to the village. From here the field is prominent and slopes up to the west. There is a backdrop of vegetation to the rear but otherwise the field is open and defined by post and wire fences. Development on the site would not constitute rounding off of the settlement limit. Rather, it would expand the village eastwards and northwards into the countryside.

**Objection 1806 – site B**

This is a small elongated site to the west of Ballinderry House (LLPA LB 05). The site is well screened to views from the road and adjoins the settlement limit. The site projects beyond the southern boundary of the village. It is not surrounded on all sides by existing development as the objector claims. Development on this site would appear as an isolated finger of development projecting southwards. We consider that development would open up the site and potentially result in the loss of vegetation around the site and access. We consider that this would be detrimental to the character of the area and the setting of the listed building, LLPA and AVC. We do not consider that this would be an acceptable form of development. We shall consider the adjoining objection (1360) in conjunction with this site below.

**Objection 1360**

This site is a field adjacent to Aghalee Road. It is bounded to the north by new dwellings on designation LB 03/01 with a hedgerow along the boundary. The southern boundary of the field aligns with dwellings on the opposite side of Aghalee Road. This boundary and the eastern one are defined by mature trees and hedging. The roadside boundary is open on the northern half and defined by a hedge for the southern half. The site slopes up from the road to the highest point in the south east of the site.

The site is open to views from Aghalee Road. In fact it is quite prominent due to its sloping nature. However, the issue with this site is one of principle rather than individual site characteristics. We consider that the site is too large to constitute rounding off despite having existing development on the opposite side of Aghalee Road. This issue would increase if objection site 1806 B were included because it would extend development to the east. We consider that the site is too large for the needs of the village for the plan period and there are no exceptional circumstances to warrant its inclusion.

**Recommendation**

We recommend no change to the Plan as a result of any of the objection sites to the south of the village.

**Lands adjacent to Dromart House (objections 404/3444 and 406)**

We shall consider these two sites together as they raise similar issues. Site 404 is 4 hectares and site 406 is 2.76 hectares. We consider that these sites individually and cumulatively are generally too large for the needs of the village and would extend the
village too far to the north. We do not accept that development should extend to the Ballinderry River just because this was would form a strong natural boundary. We must have regard to the RDS and plan strategy and our conclusions in respect of the role of villages at the strategic chapters of our report. We do not agree that the new school extends the village northwards. It would only affect another objection site and not these two.

Lands at Crumlin Road (objections 403, 3443 & 3523)

The northern portion of these lands is the site of the proposed replacement Ballinderry Primary School. The school has been constructed and is in use. The Department considered that this altered the circumstances of the objections and effectively introduced urban development to the north of the objection site. There is also new residential development constructed on the site labelled as Dromart House on the plan map. We consider that it is logical to site new development adjacent to the school, which is the only village facility. The new school encloses the lands to the south of the building. The remainder of the objection site is quite well-enclosed and would sit into the resultant urban form created by the school. However, we have concluded that there is no requirement for additional land within villages in general and conclude that this extensive site is not required. The dwellings that could be accommodated on the site would exceed that required for the villages in the Plan area. We therefore recommend no change to the Plan as a result of these objections.

MAGHABERRY

Lands to west of Maghaberry (objections 20 & 3525)

These objections relate to the same site outside the settlement limit, which consists of two large fields between Hammonds Road and Maghaberry Road. The inclusion of the site would extend the village to the west into the extensive LLPA (MY06). This objection did not make reference to the LLPA. We consider that the objection site is too large in relation to the village. It could potentially accommodate 200 dwellings. We consider that development would go beyond rounding off of the village and would intrude into the LLPA. There are no other special circumstances or arguments advanced by the objector for us to consider. We recommend no change to the plan as a result of this objection.

Lands to west of Willow Lodge, Old Road (objection 3059)

The objection refers to the exclusion of the site from the settlement limit. There are several references to additional housing land being required and so we shall treat the objection as seeking a housing zoning on the site. The site is a relatively flat field to the north west of the village. It has existing dwellings on two sides with hedgerows and trees to the other boundaries. The Department considered that it may represent an ideal opportunity to round-off the settlement limit. There is access available from the adjoining Willow Lodge development. The site could accommodate 60 dwellings and would constitute rounding-off of the limit. We consider that the existing boundaries of the site to the north and west could be retained and supplemented as part of the development management process. However, our strategic conclusion was that little additional land was required to be identified in the villages to meet the revised HGI or STLR. The site is not small scale rounding off given the number of dwellings that could
be accommodated. We therefore consider that the site should not be included in the settlement limit or zoned for housing.

LANDS NORTH OF MAGHABERRY

Objections 3528 & 3361

Objection 3528 was amended to an irregular area to the north and a narrow strip of land to the east of the village limit, all defined by existing vegetation. This broadly aligns with objection site 3361, except for a triangular field adjacent to Old Road. The northern boundary of this field aligns with the settlement limit on the opposite side of Old Road and the northern extremity of 3528. This boundary is very well defined by a double hedgerow along an old lane. We consider that it is only logical to include this field with our consideration of the site of objection 3528.

There is a large housing development underway to the south of the site (MY 02/03). The existing settlement limit follows an existing hedge, which runs for approximately half the northern boundary of MY 02/03, and thereafter it is not defined on the ground. A new village hall has been constructed on Maghaberry Road to the east of the site and the settlement limit. The Department conceded that the site was acceptable for inclusion because it was not prominent and was not within any environmental designations. The presence of the village hall persuaded them to accord the site the highest evaluation of A1.

We agree that the eastern narrow portion of the site should be included within the adjoining housing zoning (by extending the northern boundary of MY 02/03 to the east) because of the village hall development and the existing boundary definition. We do not consider that the village hall has any bearing on the northern portion of the site. The inclusion of this part of the site would bring the village limit close to the prison. The Department conceded that there was no policy basis for a separation from a prison.

We shall consider the site on its own merits, in any event. The inclusion of the site would result in an additional 4 hectares of land plus the triangular field within the settlement limit. We do not agree that just because there is no visual or site-specific issue with an objection site then it should be included. We must take account of the settlement’s position in the hierarchy and RDS guidance. As we have stated above, the RDS states that within the BMA the strategy is to consolidate villages and resist their large-scale expansion. The existing limit can be defined on the ground by new planting. The proposed limit, whilst defined by hedges, would be an unusual shape with pressure for land within the resultant v-shape to be included as the inevitable consequence.

Recommendation

We recommend that objection site 3528 and 3361 remain outside the settlement limit, with the exception of the narrow portion of land to the east of MY 02/03, as hatched on Plan 11. This portion of land should be added to Designation MY 02/03.
Objection 3513

The site is located to the north of the amended site for objection 3528. We consider that this site would represent an illogical extension of the limit northwards in an irregular manner. The site appears to be defined to the north and east by the perimeter fence of the prison and to the south by the vegetation along the northern boundary of objection 3528. The western boundary is undefined. The site is also too close to the prison. As a standalone site it is not contiguous with the settlement limit. For all these reasons we consider that the site is unacceptable, either as a single site or in combination with objection 3528 or 3361. We recommend no change to the plan as a result of this objection.

LANDS EAST OF MAGHABERRY

Objection 247

The site was reduced in the statement of case to 3 separate fields. Site A is a 0.88 hectare field to the north of MY 04/01. Site B comprises two fields north of Glen Road, lying north and south of the disused sewage works. The Department considered that site A was acceptable for inclusion within the settlement limit and exclusion from the extensive MY 06 LLPA. We consider that the small field is well defined and development would read as an extension to designation MY 04/01 (now complete). Access is available from the adjoining housing development. However, our strategic conclusion was that little additional land was required to be identified in the villages to meet the revised HGI or STLR. The site would not represent rounding off and dwellings thereon would extend development beyond the northern boundary of the village. We therefore consider that the site should not be included in the settlement limit or zoned for housing.

We shall now consider the objection to the LLPA designation on the site. None of the features of interest of the LLPA on pages 219/220 of the plan are within or near the amended site. We consider that the vegetation around the former sewage works and some site boundaries do contribute to the setting of the village. The setting of every village cannot be an LLPA, merely because it is the setting. There must be a special character worthy of protection. However, we see no particular merit in the landscape features on the site. Such features are a common feature in the countryside. Our conclusion is that this area is of little merit to justify the LLPA designation. In any event, the objector indicated that the former sewage works site would be retained as a green wedge and that boundary vegetation could be retained. It is true that development on the site would change its character from rural to urban – this is true of all land brought within the settlement limit. The Department must demonstrate why this area warrants special protection. We consider that their arguments were unconvincing. The Department did not explain why these lands were considered acceptable for development in a study prepared for the Lisburn Area Plan 2001 and are now part of an LLPA. We therefore recommend that the reduced site be excluded from the LLPA MY 06.

Site B is 5.88 hectares in area, not including the former sewage works. We have alluded to the policy context for additional land in the village above. We consider that this site would extend Maghaberry significantly to the east. The site could accommodate approximately 140 dwellings. We see no justification for such a large site
to be included given our strategic conclusions. We do not agree that the settlement limit should be extended to the buildings to the east of the site to help integrate them. Rather we think that the site should be retained as rural in order to provide separation between the village and these buildings so as not to mar the distinction between village and countryside. We agree that views from Glen Road are quite localised and that the site is not on the steep slopes that give Maghaberry its distinctive landscape setting. We accept that the key features of the LLPA are some distance from the reduced site. We have also taken into account the objectors design concept. This is a case where the additional lands are not needed and so this factor is determining.

**Recommendation**

We recommend that the reduced site (Sites A and B) as shown on the plan attached to the statement of case is excluded from LLPA MY06.

We recommend no change to the settlement limit in respect of either site A or site B.

**LANDS SOUTH OF MAGHABERRY**

**Objection 3440**

This is an objection to the exclusion of the site from the settlement limit and its inclusion within LLPA MY06.

We consider that the site would not round development off to a logical limit. Several of the site boundaries on either side of Trummary Lane are not defined on the ground. Development on the site would appear isolated and would project well beyond existing development in the area. We were not presented with any exceptional circumstances or other arguments for consideration.

In terms of the LLPA, the Department's evidence was weak. The general point about rural character changing to urban as a result of development does not justify the designation. We consider that there is not sufficient nature conservation value in these two open fields and hedges to merit a LLPA designation. However, these lands are located to the south of the village close to the edge of the steep slopes that define its setting. Long range views of the site would be available from the A3 and A26. The inclusion of the site would mean that the village would encroach further towards Trummary. This is one of the key features listed in the designation. On balance we consider that the LLPA is justified on this site.

We recommend no change to the Plan as a result of this objection.

**Objection 2955**

This site was reduced at the hearing to the more western of the two fields. Access was shown via 15 Maghaberry Road, which is within the settlement limit. The Department indicated that some development would be acceptable on part of this field. Their concern was the impact of development on the southern portion on the LLPA. They considered that the LLPA designation could be removed for part of the site. However, there was no objection to the LLPA designation contained in the original objection letters. We cannot therefore consider any amendments to the LLPA in this area.
4 new dwellings have been constructed on adjoining land to the east and the primary school is located beyond that land. We consider that the reduced site not to be a small-scale rounding-off. Whilst the field is well-enclosed by existing vegetation and development could be designed and sited to sit into the existing village form and be unobtrusive, development of the site would extend the village to the south. We agree that the LLPA would be an extra control on the form of development. Proposals would have to ensure that there was no impact on the important landscape features of the LLPA. However, our strategic conclusion was that little additional land was required to be identified in the villages to meet the revised HGI or STLR. We therefore consider that the site should not be included in the settlement limit or zoned for housing.

We recommend no change to the Plan as a result of this objection.

MILLTOWN

OBJECTIONS TO THE SETTLEMENT LIMIT

Wilmar Road (objections 252 & 3069)

These objections related to the same site. Objection 252 related to the RLW and sought inclusion in the Lisburn Settlement limit. We consider that it relates more to the Milltown limit. No case was advanced to explain why the objection should succeed. The site is an important part of the RLW separating the city and Milltown. Development of the site would compromise this strategic function of the RLW. We consider that the site should remain as part of the RLW and not be brought within the settlement limits.

Objection 3069 solely related to the LLPA designation on the site and sought a DOS designation for a filling station/hotel. We agree with the Department that there is no basis for exclusion of this large site from the LLPA. The site contains an attractive farmhouse and outbuildings and contributes to the setting of Christ Church on top of the hill. The site is also a major part of the RLW between Milltown and Lisburn. The development of the site would compromise the strategic function of the RLW and be detrimental to the important landscape features that led to the designation of the LLPA. We have concluded that DOS Designations are not warranted in the countryside in Part 1 of our report. We recommend no change to the Plan as a result of this objection.

Derriaghy Road (objection 3373)

This is a sloping site, which is removed from the Milltown development limit. The site is within the RLW. The site is physically separated from the limit and cannot constitute rounding off of the limit. The development of the site would lead to prominent urban sprawl in an undesirable direction. We therefore recommend no change to the Plan as a result of this objection.

Derriaghy Road (objections 3531 and 704)

Objection 3531 site was reduced at the hearing to the field abutting the settlement limit between Oldpark Road and Derriaghy Road. The next field to the west was suggested
should the Commission consider that more land was required in the Milltown area. The objector’s case relied on the site being the only one in Milltown that was outside environmental designations e.g. RLW, LLPA, etc. The Department had stated that it was appropriate in principle to allocate additional growth to the villages, which we have considered in the strategic housing section of this report. We agree with the Department that this does not mean that an unsuitable site should be included within the development limit merely because it is the only objection site. The required additional growth can be accommodated in the other villages or within Lisburn itself, given the close proximity of the city boundary. We note that there is also a potential development site within the existing village limit west of Barnfield Grange (MN 05/03). We shall therefore consider the site on its own merits on the basis of the reduced area that was advanced.

The field is quite prominent sloping up from Derriaghy Road before dropping again to the sunken Oldpark Road. There is little vegetation to screen views of the site. We consider that the development of the site would result in urban sprawl in one direction poorly related to the existing village form. The two dwellings on the site are visually and physically separate from the village. The site boundary would not represent a better development limit. The urban form considerations and the prominence of the site mean that it is unacceptable. It logically follows that field B is also unacceptable for the same reasons.

The remainder of the original site on the opposite side of the road was the subject of a separate objection (704). This part of the site is within a LLPA and RLW. We have made our position on the extent of the RLW clear above and we were not presented with any exceptional circumstances that would justify the removal of this part of the site from the RLW. We also consider that the LLPA would be a constraint on development in the absence of any objection to this designation. We consider that the existing development limit is well-defined by a stream and mature vegetation. The inclusion of the site would represent urban sprawl that is poorly related to the existing village form. It would prejudice the RLW and LLPA. We consider that this part of the site is unacceptable. We recommend no change to the Plan as a result of this objection.

West of Barnfield Road (south of MN05/03) (objection 901)

Whilst the objection states that it should be considered together with land to the south, this is not the subject of an objection and so cannot be taken into account. Part of the identified site contains the foundations and gardens of former dwellings. This part of the site is within the existing development limit as shown in the draft plan and need not be considered further. The remainder of the site is within a LLPA and a SLNCI as identified in the plan; both of these designations are not subject to any objection. The site is part of an attractive wooded glen and development would detract from the environmental quality of the area and those features that led to the designations. This damage would outweigh the rounding off and urban form arguments advanced. We consider that the development limit should be unchanged as a result of this objection.

West of Barnfield Road (north of MN05/03) (objection 2962)

This site is a notch in the existing development limit and would represent rounding off in terms of urban form. It would relate well to the existing housing zoning MN 05/03. There are no intrinsic features of worth on the objection site itself apart from the field boundaries on three sides. The Department’s concern was that the site is within LLPA
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MN09. This is an extensive LLPA to the NW of the village. It is appropriate to consider the features that led to the LLPA designation and the impact of development of the site on those features. We do not agree that the site makes a significant contribution to the village setting. The host field continues to rise after the objection site and would provide the village setting if the site were included in the development limit. St. Patrick’s Church is 250m away and cannot be seen from the site. Consequently, we do not agree that the site contributes to the setting of the church either. Development on this site would be to the rear of the locally significant 30s and 50s dwellings and separated from them by their extensive rear gardens (these gardens are excluded from the LLPA). The existing newer dwellings at Barnfield Grange are closer and more obvious features in the setting of the 30s and 50s dwellings. We consider that the development of the site would not impact negatively on the LLPA or setting of the village. As the site would represent rounding off of the development limit it would be illogical to exclude it from the village. The relatively modest size of the site and the fact that Milltown is in a sustainable location close to both Metropolitan Lisburn and Lisburn City are also factors that influenced our decision to recommend inclusion of the site. The matters of landscaping and access can be addressed at the development management stage, as we are not recommending that the site be included as a housing land use policy area.

Recommendation

We recommend that the site should be included within the settlement limit.

49a Derriaghy Road (objection 2830)

This objection seeks that a dwelling, garden and adjoining land within the development limit be zoned for housing as an extension to MN 04/01. MN 04/01 was designated because there was a planning application on the site. We are not aware of a planning application for this site and therefore the Department may not wish to include it in the Designation. These designations are not zonings because Milltown is a village where Land Use Policy Areas are designated. Whether or not it is so included, the site is within the development limit and proposals can be advanced for housing. The other matters referred to in the objection seem to be related to the hypothetical situation of a site outside the development limit and are not relevant. We make no recommendation on the substantive objection of whether the site is zoned for housing. We recommend no change to the Plan as a result of this objection.

RAVERNET

Lands around Ravernet (objection 996)

The objectors identify the land they own around the village and complain of the lack of expansion in the development limit. We have explained above the reasons why we consider that this is justified. New developments have taken place in the village and this has not arrested the decline in services. Presumably this is a result of the proximity of Lisburn, Sprucefield and Hillsborough. We cannot see what the objection is attempting to achieve. If all the land in the objectors’ ownership is suggested for inclusion within the settlement limit, then this would expand the village several times over and lead to environmental concerns regarding the impact on the setting and character of the village. Objections to the Green Belt are no longer before us. The
consultation process is a matter for the Department. We recommend no change to the plan as a result of this objection in respect of Ravernet.

**Lands at Carnbane Road (objections 402 & 3081)**

The site does appear as a notch in the development limit when viewed in plan form. It has good boundary definition to the south provided by a strong tree line and a stream. The housing on the other side of Carnbane Road is well landscaped and so the approach into the village is semi-rural until one arrives at Highgrove and Shelling Court. The site contains a gentle ridge, which almost screens Highgrove from view on some of the approach along Carnbane Road. This ridge is quite close to the road and development on the site would be prominent. We consider that the characteristics of the site mean that development would be detrimental to the setting of the village on this pleasant rural approach. We do not consider that any attempts to leave the “mound” clear of development would assist because the elevated nature of the site is too extensive for that approach to succeed. The site must be assessed as it stands and in any event, sculpting the landform would not be any more successful. We have also indicated that the village should not expand significantly and therefore this site would be too large for inclusion. We recommend no change to the Plan as a result of these objections.

**Lands at Legacurry Road (objection 3048 – site A)**

We consider that this site would not respect the existing urban form of the village. It would represent a projection northwards into a designated LLPA (RT 04) in the plan. This LLPA is not the subject of any objection. The landform slopes down to the Ravernet River and forms part of the attractive landscape setting of the village. We also consider that the site is too large for the needs of the village. We recommend no change to the Plan as a result of this objection.

**Lands at 112 Ravernet Road (objection 3048 – site B)**

This objection was not supported by any evidence or submission. The Department conceded that the site could be acceptable in their site analysis matrix (B1*). They did acknowledge that the site was too large for the identified need of the settlement.

The site is elevated above the existing development to the north. Indeed in certain views across the site only the roofs of the buildings beyond can be seen. There are open views across the site on the approach into the village from the south. We consider that development on this site would be very prominent and would be detrimental to the character of the village in terms of the impact on the village setting. The majority of the site is elevated and so would be even more prominent than the objection site on Carnbane Road to the rear. The differing approaches taken by the Department to these two equally prominent sites is somewhat puzzling. We consider that the site is too large to constitute rounding-off. We have also indicated that the village should not expand significantly and therefore this site would be too large for inclusion. We recommend no change to the plan as a result of this objection.
STONEYFORD

Lands to the west of Stoneyford: Sites A-D (objection 256)

The objection identifies four parcels of land to the west of Steedstown Road and Moss Road. Site C is not contiguous with the settlement limit or even with sites A, B and D. We consider that the above roads form a very definite western stop for the village and that development beyond them to the west would not be appropriate. This applies irrespective of the size of site. Some of the sites are too large for the future needs of the village. One of the sites would also involve development on the wetlands to the west of the village, which is part of a LLPA. This would be unacceptable for that additional reason. We recommend no change to the Plan in relation to these sites.

Lands east of Stonebridge Meadows (objections 256: site E, 395 & 1383)

We consider that objection sites 256 E and 1383 are too large to merit inclusion. They would accommodate well in excess of 100 dwellings. We have stated above that development in the village should be constrained to small-scale expansion only. There is also a flooding issue related to the site, which we shall discuss below. There is no guarantee that shops would have been provided as part of any of the proposals. This could not have been made a requirement of development. There are locations within the village where shops could be developed, e.g. the former public house site.

Objection 395 was reduced to a strip of land adjoining Stonebridge Meadows. We consider that even though the site is now only 1.5 hectares, this is still too large. There are lands available within the existing limit and the lack of facilities and minor role for villages mean that only very small-scale rounding off would be acceptable. The reduced site could not support a shop and no indication of this was given by the agents at the inquiry.

It emerged during the course of the inquiry that the site lies within a floodplain. Photographs showing flooding on the site and in Stonebridge Meadows in 2005 were supplied. We were informed that flood alleviation works have been undertaken because houses have been flooded on 7 occasions. These works were to be completed in 2008. It was pointed out that bridge and culverts can block flows and cause further flooding. The site remains within the floodplain. We do not propose to address issues of flooding because we have concluded that the site should not be included within the settlement limit.

The Department accepted that access would not be an insurmountable issue and could be addressed. However, it would involve third party lands. We therefore recommend no change to the Plan in respect of these objections.

Lands north of The Beeches Manor (objections 1482 & 3393)

These sites lie to the north of the village and they do not constitute rounding off of the settlement limit. Rather development on these sites would constitute an urban sprawl of the village northwards. Development would breach the natural boundary provided by the Stoneyford River. There is land available for development to the south of The...
Beeches Manor. Both sites are also too large for the modest needs of this village. We recommend no change to the Plan in relation to these sites.

**Lands south of Stoneyford (objections 263 & 3453)**

Objection site 263 amounts to approximately 8 hectares. Its form is a long triangle projecting from the south west corner of the village. We consider that it is too large for the needs of the village and would represent considerable sprawl along Moss Road. The site is of excessive scale in relation to the size of the village.

Objection 3453 was reduced to a 1.5 hectares portion of land between Moss Road and SY 03/01, south of Ashvale Heights. We do consider that this site could be viewed as squaring off the southern settlement limit. There is no existing boundary definition for the site. However, the objector indicated that an 8 – 10m buffer of planting could be provided. The site is flat and development would be visible from Moss Road. It would be seen in the context of the existing dwellings to the north and east and those to the north are at a higher level. We consider that a satisfactory access to the site would be feasible either from Moss Road (with improvements if necessary) or from GY 03/01.

It was argued that the site was an important part of the SY 06 LLPA because of its nature conservation interest and its contribution to the setting of the village. The area of conservation interest would be the wetlands on the west side of Moss Road. This site appears to be semi-improved rough pasture with little of interest. The setting of the village is defined by the settlement limit and a LLPA designation is not justified around every village just because it forms part of the setting. We found the Department’s evidence on this issue not persuasive and consider that the LLPA designation should be removed from the site if it were found to be acceptable for inclusion within the settlement limit.

We acknowledge that the site is relatively small, but we consider that there is no need for additional land within the settlement limit of the village. On this basis alone we recommend no change to the Plan as a result of this objection.

**OBJECTION TO LLPA DESIGNATIONS**

**SY 06 – Stoneyford River and Reservoir (objection 3446)**

The original objection erroneously claimed that the site was outside the settlement limit and objected to this exclusion. This is not the case: the site is within the limit and is entirely within Designation SY 03/01 housing land use policy area. The only element of objection to be considered is to the above LLPA. The Department conceded that as the site had planning permission for residential development and was designated for such development in the plan then the LLPA should be amended to exclude the land identified for housing. The river and a 5m strip along its banks should be retained within the LLPA. We note that housing development has now taken place on the site. We agree that there is no basis for the housing area to be included in this extensive LLPA. We also agree that the river corridor is an important natural feature that should be protected.
Recommendation

We recommend that Designation SY 03/01 housing land use policy area is excluded from LLPA SY 06 – Stoneyford River and Reservoir, with the exception of Stoneyford River and lands within 5m of the river bank.

UPPER BALLINDERRY

Housing Land Use Policy Areas

UB 04/02 – North Street

The objection sought the removal of the designation from the settlement limit. We consider that the removal of the site would be illogical because of the development site to the north and the hall to the south, both of which would remain inside the limit. The current village boundary follows the western boundary of these two sites and omitting the objection site would leave a notch in the limit. No other arguments were presented for our consideration by the objector. We recommend no change to the Plan as a result of this objection.
SMALL SETTLEMENTS

General Objections to the Settlement Limits of Small Settlements

Elevate made objections to almost every small settlement development limit. We propose to deal with them generically in this section. We have recommended that the limits of small settlements are strictly controlled in Part 1 of our report. We cannot therefore agree with the argument that the settlement limits are too restrictive. We consider that the limits allow for sufficient growth in the context of small settlements being at the bottom of the settlement hierarchy. In any case as no specific amendments were suggested to settlement limits then these objections cannot result in any changes to these limits. The fact that future generations would have to out-migrate has to be balanced against the position of these settlements in the hierarchy and our strategic conclusions on their expansion in the light of RDS directions. The designation of LLPAs accords with the Plan Strategy and as development is not precluded within LLPAs then there is no need to extend development limits to compensate for them. Several other objectors referred to various settlement limits and claimed that they did not offer any opportunities for new development. We would question the veracity of this assertion in most cases and even if it were true it would not be a factor that should be taken into account in the consideration of individual objections, given our strategic conclusions on the expansion of small settlements.

BALLYAUGHLIS

Lands south of Ballyaughlis (objection 3077)

The objection illustrated a significantly extended development limit to the south of the defined small settlement of Ballyaughlis along Drumbo Road and proposed the inclusion of a defined site within the new extended limit. This would increase the size of the settlement many times over. We have set out our conclusions on the designation of small settlements in paragraph 2.2.13 of Part 1 of our report. There is an obvious concentration of development at the crossroads and this has been included within the settlement limit. We consider that this concentration of development is different to the suburban road frontage dwellings in extensive grounds that have been identified by the objector as worthy of inclusion within the limit. There are many examples of such suburban development in the Plan area. No evidence was presented as to why these properties should be included. The identified site itself is over 500m from the settlement limit and is approximately the same size as the defined settlement. The site contains no buildings. We consider that the site should not be included in the settlement limit but remain as part of the AOHSV. We recommend no change to the Plan as a result of this objection.

Objection 3147 is considered in the Lagan Valley Regional Park Volume.

BALLYLESSON – See Lagan Valley Regional Park Volume
BALLYNADOLLY

Objections 425 and 260

Objection 425 seeks the inclusion of approx 3.03 hectares to the North West end of the settlement for housing and associated uses. This would virtually double if not almost triple the size of the settlement. Development on this scale would be inappropriate and we note that the objection site contains rising land and any development would be prominent when viewed from the Killultagh Road. We agree with the Department that its inclusion would lead to excessive growth and would elongate the settlement limit of Ballynadolly to the North West along Killultagh Road. We also consider this to be the case with the objectors’ fall back position which reduces the site to an undefined boundary in line with the north western boundary of the new primary school. Although avoiding the LLPA designation, its inclusion would still be out of scale with this small settlement and development on it would also be prominent. The new school does not justify the extension of the settlement limit.

Objection 260 to the south east also seeks inclusion within the development limit. Again it would create sprawl along the Glenavy Road and we do not consider that it would consolidate development or produce a compact settlement form.

We recommend no change to the Plan as a result of these objections.

BALLYSKEAGH – See Lagan Valley Regional Park Volume

BOARDMILLS

Objection 2299

Objections seek the inclusion within the settlement limit of sites to the south west and the north east. We are satisfied that inclusion of either site would result in development out of scale with this small settlement. Inclusion of objection site 2299 would significantly extend development to the west and stretch development out along the road which would be detrimental to the setting of the settlement on approach from the south west. We fail to see the relevance of the objector’s reference to the lack of analysis of the village Mill history and the 2 stone mills within the settlement and that the relics of the stone buildings associated with the mill are on the objection site. These remnants are not a factor that would override the concerns with the site.

Objections 945 and 3533

We consider that development on the eastern side of Creevy Road on either the larger - 945 or smaller objection site - 3533, which comprises of rising land - part of a drumlin, would be particularly detrimental to the character and setting of the settlement of Boardmills and would be an unacceptable visual intrusion into the open countryside. Development even at a low density and incorporating the windmill stump as suggested would impact on the views and setting of the Windmill Stump and setting of the Rath at the summit of the hill. We agree with the Department and counter objectors that the lands should remain within LLPAs BS 02 and BS 04 as they contribute to the intrinsic
environmental value and character of these areas and protect the visual amenity and local landscape setting of the settlement.

We recommend no change to the Plan as a result of these objections.

**DRUMLOUGH**

**Objection 908**

Rather than infilling and rounding off the settlement of Drumlough notwithstanding the vegetated boundaries to the north and west, the inclusion of the objection site would elongate development to the west along Drumaknockan Road, beyond the western boundary of the settlement limit and into the open countryside. We also consider this objection site to be out of scale relative to the size of the settlement of Drumlough and its inclusion would be contrary to the objectives of consolidation and compact settlement form.

We recommend no change to the Plan as a result of this objection.

**DRUMLOUGH ROAD**

**Objections 915 and 637**

We note that within the Countryside Assessment justification for the settlement limit is to prevent further ribbon development along the Drumlough Road and prevent encroachment into the open countryside. We agree with the Department that the inclusion of the linear roadside objection site at the eastern side of the limit extending down to the Tullymore Road represents excessive growth relative to the size of the settlement. The objection site to the western edge would also extend the ribbon of development and to this extent we disagree with the Department’s opinion. Whilst, we acknowledge the nature of the settlement is of an elevated ribbon of development and notwithstanding the proposal of a landscape buffer along the undefined northern and eastern boundary of this objection site, its linear extension down to the Tollymore Road breaking into the open countryside does not represent a logical rounding off as claimed by the objector. We consider that there are opportunities for infilling of gaps within the existing settlement limit. This is the case even if there are no undeveloped sites within the limit, as claimed.

We recommend no change to the Plan as a result of these objections.

**DUNEIGHT**

**Objection 445**

**Site A**

There is no need to consider land included within the development limit. The lands that lie outside the development limit have been divided into 2 sites (A & B). Although the Department accepted that both sites A and B are suitable in principle for development, we do not agree with this analysis. Development along the southern side of The Grove...
presents a strong existing built edge to the north-eastern side of the development limit. Opposite this is also a strong roadside boundary. The inclusion of site A, would represent an unnecessary intrusion into the open countryside as there is no natural definition to the proposed northern limit boundary. We do not consider that breaking into a corner of an open field as is the case with site A, represents consolidation of the settlement or a compact urban form.

**Site B**

The northern edge to the settlement boundary is well defined by a curtilage of fencing and hedging of the last of a string of detached roadside dwellings addressing Limehill Road within the settlement limit. Travelling to the north along Limehill Road there is a marked difference in character as within the settlement limit development reads as a row of roadside dwellings up to the brow of a hill which marks the settlement limit. Beyond this is the objection site which includes a gap site and a large 2 storey property set within a large and open curtilage. It extends into the open countryside and falling ground. We consider that the inclusion of objection site B would result in the elongation of the settlement limit to the north along Limehill Road beyond its well defined and logical limit. Visually the objection site relates more to the open countryside to the north rather than lands within the settlement limit. Its inclusion would not constitute consolidation or a compact urban form.

We recommend no change to the Plan as a result of these objections.

**EDENDERRY – See Lagan Valley Regional Park Volume**

**FEUMORE**

**Objection 3163**

There is a new dwelling under construction on the site. This objection site is separated from the settlement limit by a dwelling and curtilage that has not been included within the limit and is not the subject of an objection. It would be illogical to include this site within the settlement because it is not contiguous with the development limit. The inclusion of the site would not constitute rounding-off, but would extend the settlement limit into open countryside. We therefore cannot recommend this objection for inclusion for this reason also.

**Objection 220**

The Department did not explain why the local church despite its immediately adjacent location was not included in the settlement limit. However, the church was not included in any objection site and cannot therefore be considered by us. This objection site lies beyond the church in any event, and includes land north and south of the road. The southern portion is separated from the limit by the church and the main road and so is unsuitable for inclusion. The northern portion is separated from the development limit by a small access lane and so could be considered. Its inclusion would not constitute infill or rounding off because of the site’s size and peripheral location. We do not consider that the factors identified in the letter accompanying the objection such as
proximity to the church or the presence of streetlights or sewers to outweigh our concerns with the objection site. There is land available for development within the existing settlement limit and no need for any more land to be included in the light of our strategic conclusions regarding the role of small settlements.

We recommend no change to the Plan as a result of these objections.

HALFPENNY GATE

Objections 784 & 728

Objectors seek the inclusion of 2 large sites to the southern side of the settlement. We are satisfied that inclusion of either site would result in development out of scale with this small settlement. The curtilages of existing properties along the Halfpenny Gate Road provide a strong edge to the settlement. Development of the objection sites would break into open countryside extending development considerably to the south and would represent urban sprawl detrimental to the setting of the settlement. Such development would neither consolidate the existing settlement nor keep it compact.

We recommend no change to the Plan as a result of these objections.

HALFTOWN

Objection 3275

There is a strong vegetated laneway boundary to the settlements southern side providing a strong defining edge. The objection site is a roadside field beyond this existing southern boundary. Its inclusion would extend development beyond this strong southern edge breaking into the open countryside extending development along the road. This would be contrary to the objectives of consolidation and compact settlement form. In visual terms the site relates with the open countryside to the south and east rather than the urban characteristics of the settlement to the north.

Objection 465

The site comprises 1.76 hectares to the east and rear of Coronation Gardens. Part of the objection site immediately to the rear of Coronation Gardens is already within the designated settlement limit. The embankment that defines the eastern boundary of the settlement provides a natural and defensible settlement limit. Inclusion of the objection site represents significant expansion relative to the size of the settlement and would be out of scale. It would not consolidate the settlement or keep it compact. We agree with the Department that although part of the site is surfaced with tarmac and some derelict building remains, it is predominantly rural in nature.

Objections 3784, 3673 & 1137

These objections relate to the same site of 0.79 hectares to the north of the settlement. The objector has referred to the previous Lisburn Area Plan report and a previous Commission decision and we agree with the Commissioner’s findings that the site is
well enclosed and contained with mature vegetation and views into the site are only available from the site frontage. In the intervening years the mature vegetation has grown and the site has become even more visually enclosed. We consider that the current northern development limit is well defined with the curtilages of properties of Florence Court. Even though the objection site is well contained, we agree with the Department that its inclusion would extend and push development to the north along the Halftown Road and therefore find its inclusion contrary to the objectives of consolidation and compact urban form. The inclusion of the site would not accord with our strategic conclusions on small settlements either.

Objection 444

This is a backland site of 0.69 hectares to the south east of Coronation Gardens with existing buildings and curtilages on two sides. It is well hidden from view when travelling the Halftown Road in either direction but from within the settlement the objection site appears unsightly. Mature trees and hedges define the boundaries and there is a copse of mature trees to the south east corner of the site. We consider that inclusion of the objection site would neither consolidate nor keep the settlement limit compact. We are not persuaded that access concerns raised by Roads Service are valid because the objector owns adjoining land within the limit that can be used to access the site. We recommend no change to the Plan as a result of this objection.

HILLHALL

Lands at Hillhall Road/ Braniel Road (objection 442)

This objection site is outside Lagan Valley Regional Park. It relates to approximately 7 hectares of land to the south of the eastern node of the settlement. It consists of three fields bounded by Hillhall Road and Braniel Road to the East. The fields are in agricultural use and the landform generally rises up to the south. The objector states that development could be restricted to the lower portions of the site and a new boundary created by “augmented landscaping”. No indication was provided of the reduced site area and so we cannot address this point in detail. We assume that the objector envisaged development on the lower fields (or parts thereof). We have concluded strategically that the expansion of small settlements should be resisted. The inclusion of this site would result in significant intrusion into the rural area, which is part of an AOHSV. Any development as described in the objection and submissions would go beyond small scale rounding-off or infill and we cannot endorse the inclusion of the site for this reason. The presence of facilities and employment nearby does not override our concerns with the objection. We would agree that a satisfactory access may have been achievable. Access onto Hillhall Road may have been possible despite its status as a protected route, if it was within an expanded settlement limit. Braniel Road would not be suitable as an access route as it stands but it may have been possible to undertake improvements. We recommend no change to the Plan as a result of this objection.

Other objections are considered in the Lagan Valley Regional Park Volume of this report.
KESH BRIDGE

Objections 51 and 3079

These objections sought the inclusion of 0.26 hectares to the north of the settlement limit. This site is of a modest size on the road frontage, has the strong boundary of the M1 to its northern side and lies well into the settlement form at the level of the M1 and if included would mirror the settlement line at the opposite side of the road within LLPA KE 02. Therefore given its low lying, infill nature we find that its inclusion within the settlement limit would constitute a logical rounding off and consolidation of the settlement limit notwithstanding the absence of a naturally defined eastern boundary.

Recommendation

We recommend that objection site 51 and 3079 (same site) be included within the settlement limit.

Objection 3821

The objection seeks the inclusion of 0.76 hectares to the south west of the settlement limit. The site is not visible from the Kesh Road due to frontage development. On approach to the settlement travelling from the west along Agnatrisk Road, the objection site reads as open countryside on the brow of the hill to the rear of the frontage development of Triskan Dale. Closer to the settlement boundary the objection site is read against existing development of the settlement. Although on plan the objection site reads as a notch within the settlement form and is defined on 3 sides by the curtilages of existing dwellings, we consider it to be large scale relative to the overall size of the settlement, breaking across open countryside which would be detrimental to the setting of the settlement on approach from the west on Aghnatrisk Road. Due to its scale we consider that it would neither consolidate the existing settlement nor keep it compact.

The objector claimed that there were no development opportunities within the settlement limit however the large site to the north of the settlement limit which was previously Kesh House and designated as KE 02 has since been demolished and the site cleared and therefore constitutes a fairly large development opportunity within the settlement limit.

We recommend no change to the Plan in respect of the objection.

LAMBEG – See Lagan Valley Regional Park Volume

LEGACURRY

Objection 3632

The site comprises 1.24 hectares to the north east of the settlement lying between Comber Road and Gardeners Road. We find that its inclusion would result in a large scale extension of built development into the open countryside to the north east, relative to the size of the settlement and this would not achieve consolidation and a compact
settlement form. We do not agree with the objectors that the inclusion of the site would be a moderate rounding off around the central point of the settlement. The objectors’ points that the site is near a bus route and can be linked to sewage works are not sufficient to outweigh our concerns. We recommend no change to the Plan as a result of this objection.

Objection 397

This is a small site of 0.1 hectares abutting the settlement limit only on its eastern side resulting in a gap between the southern boundary of the objection site and the limit at 293 Ballynahinch Road. We note that the Department has accepted that the line of the proposed limit has no physical boundary at 293 Ballynahinch Road and in fact appears to cut across the front garden leaving the house itself just outside the settlement limit. However, no. 293 is not within the objection site and so there is no justification for the inclusion of this site, which would go beyond small scale rounding-off of the settlement limit. We recommend no change to the Plan as a result of this objection.

Objection 3668

The objection relates to 2 portions of land – one to the rear of the old primary school and a portion fronting onto Gardeners Road. Built development on these lands would be out of scale with Legacurry and would be inappropriate for a small settlement. The land fronting Gardeners Road is elevated and rising when viewed from Gardeners Road and any development on it would appear prominent. The part of the objection site to the rear of the school is within the proposed LLPA – LY 04 which is designated due to the locally significant school building built in 1925 and its surroundings. This portion of the objection site comprises of steeply sloping land to the rear of the old school building and in our opinion this sloping backdrop makes a material contribution to the visual amenity and setting of the old school building within the settlement and therefore justifies the LLPA designation. Although an LLPA designation does not preclude development, we are in no doubt that any development on this sloping land would be particularly prominent when viewed from the Ballynahinch Road and would be detrimental to the visual amenity of the LLPA within the settlement. We consider that the LLPA should be confirmed and that there should be no change to the settlement limit as a result of this objection.

Objection 141

The site comprises 2 portions of land on either side of the Upper Ballynahinch Road – 1.08 hectares to the north and 2.16 to the south. There was no objection to the LLPA designations which embrace the objection site – LY 03 and LY 04 and therefore these LLPAs are confirmed. We agree with the Department that the rectangular strip of land to the north is very prominent when viewed from the Ballynahinch Road. The defined settlement limit of the curtilages of dwellings and Legacurry Church presents a strong defensible limit to the east and development extending to the east across open countryside on this elevated land would appear prominent and obtrusive. We would also agree with the Department that the inclusion of the portion of land between Upper Ballynahinch Road and Comber Road would significantly extend the settlement limit to the south east breaking across open countryside and creating urban sprawl – again the settlement limit abutting this part of the objection site has strong and logical definition. We are of the opinion that development on either side of the road would detract from the setting of Legacurry and would be a significant intrusion into the open countryside. We
do not agree with the objectors that its inclusion would consolidate development or produce better gateways to the settlement on approach from the Upper Ballynahinch Road.

We recommend no change to the Plan as a result of these objections.

LONG KESH

Objection 366

Parcel A of objection site 366 is divorced from the north western side of the settlement limit by a section of the Down Royal Race Course and its inclusion would be illogical. We agree with the Department that its inclusion would lead to urban sprawl extending development to the north east. Parcel B adjacent to the River Lagan lies between Lurganure and Long Kesh and is not physically linked to either settlement development limit. There is a physical and visual separation between the two settlements and its inclusion would lead to urban sprawl, and would mar the clear distinction between Long Kesh and Lurganure. The inclusion of either parcel of land would not consolidate the existing settlement or keep it compact. We recommend no change to the plan as a result of the objection.

Objections 423 & 2999

The site in respect of objection 423 was reduced to include only the two western fields of the original objection site. We consider that Long Kesh is a linear settlement with development depth generally of single dwellings set within roadside curtilages. There are exceptions to this to the north east of the objection site at the Chancery Chase development where development extends to the east. We consider that inclusion of even the reduced objection site would significantly extend development to the east breaking across open countryside resulting in an illogical protrusion in the settlement boundary form. It is neither rounding off nor consolidation of the settlement limit which at present is logical and defensible following the curtilages of existing dwellings. We do not consider that the development at Chancery Chase is justification for the inclusion of the objection site as claimed by the objector as they are physically and visually well separated but rather that the inclusion of the objection site would set a precedent for development on the backland fields to the south which would be detrimental to the setting of Long Kesh. As this is our conclusion in respect of the reduced site, it follows that the larger original site (objection 2999 refers) is also unacceptable.

In the context that the Maze Masterplan has no statutory basis, we consider that the Maze Strategic Land Reserve (LN09) is a separate matter and cannot be used as justification to extend the development limits of the small settlement of Long Kesh.

Objections 3483 and 3497

3483 seeks the inclusion within the settlement limit of an 0.85 hectare backland site along the rear of no 43- 49 Gravel Hill Road and objection 3497 seeks the inclusion of an 0.41 hectare backland site along the rear of 37 Gravel Hill Road. As discussed we consider that Long Kesh is a predominantly linear settlement with mainly roadside dwellings although there is an exception to this at the Chancery Chase development where development extends to the east. Although the objection site 3483 abuts the
development limit on 2 sides, the southern and eastern boundary face out onto open countryside. Similarly, objection site 3497 abuts the development limit on 2 sides and it also faces out onto open countryside on its northern and undefined eastern boundary. In our view inclusion of either of the objection sites would result in the extension of built development into the countryside, stretching along the rear of roadside dwellings and would not achieve consolidation or a compact settlement form. We recommend no change to the Plan as a result of these objections.

Objections 694 and 3305

Inclusion of either site would result in development out of scale with this small linear settlement. The curtilages of the roadside dwellings provide a defensible edge to the settlement. Objection site 694 is a large open and exposed site and is isolated from the settlement limit connected only by a laneway. Objection site 3305 is also open and exposed sandwiched between settlement limit and objection site 694. Development on either site would break into open countryside extending development significantly to the east constituting urban sprawl which would be detrimental to the setting of Long Kesh on approach from the south. Development on either site would not consolidate the existing settlement nor keep it compact. We recommend no change to the Plan as a result of these objections.

Objections 1998(also to LLPA Designation LH 05)

The Department confirmed that there is a 2004 planning approval for an extension to provide a hotel comprising 25 bedrooms, function room and associated ancillary areas along with car parking and other site works to include demolition of outbuildings and public bar (s/2003/0476/f). This approval related to the entire site. It would be therefore logical for this objection site to be included within the development limit to reflect the extent of the planning approval. Objection 1998 also includes an objection to LLPA designation LH 05 – Public House Kesh Road, which relates to the locally significant building and its surroundings. The LLPA includes a 2 Storey Inn – previously a dwelling with recent single storey extensions and an older public bar. We note that the Department have confirmed that the principle landscape elements – the mature trees to the front and rear of the buildings have been felled, pending commencement of the development and the LLPA now specifically recognises only the local significance, historic merit and archaeological interest of the public house and its setting. We were also informed of an application submitted in 2007 for the demolition of all existing buildings and the erection of residential development consisting of 39 apartments, underground car parking and associated landscaping. We do not know the outcome of this application. The buildings have been considerably extended over time, and now sit within an extensive area of tarmac around the buildings and up to the road frontage. Given this, and the approval including part demolition and the subsequent undetermined applications, the factors which constituted the LLPA no longer apply. We consider that the LLPA is no longer justified.

Recommendation

We recommend that objection site 1998 be included within the settlement limit and that LLPA Designation LH 05 is deleted.
LOWER BROOMHEDGE

Objection 793

The objection crudely indicates a field to the south west of the limit and a portion of land adjacent to this to the rear of roadside curtilages. Inclusion of the objection site would, in our opinion, significantly extend development to the south west into the open countryside stretching the development limit to the curtilages to the south west and elongating the development form along the Lurganure Road. This is contrary to the objectives of consolidation and compact settlement form. We recommend no change to the Plan as a result of the objection.

LURGANURE

Objection 790

This objection relates to a large extent of land to the south east of the settlement limit extending to the south of the Lurganure Road to the River Lagan and significantly out to the east. No precise boundaries are indicated. We judge that inclusion of this extensive objection site, which would almost triple the size of the settlement, would result in development significantly out of scale with the small settlement and would be detrimental to its setting.

Objection 3324

The western boundary of the settlement limit is logical and well defined by the rear of property curtilages. Inclusion of the 1.6 hectare site would extend development to the west beyond the settlement boundary into the open countryside resulting in built development stretching from the Moira Road to the Lurganure Road. Visually, the objection site relates with the open countryside rather than the urban form of the settlement. We consider the objection site to be out of scale and its inclusion would run contrary to the objectives of consolidation and compact settlement form. We recommend no change to the plan as a result of the objection.

MAGHERACONLUCE

Objection 996

The objection relates to a very large area of land to the south west of the settlement limit. The site is on the opposite side of the road from the settlement limit. Inclusion of the site would effectively double the size of the settlement and would constitute significant urban sprawl in a south easterly direction. It is significantly out of scale with the settlement and would be detrimental to its setting. We recommend no change to the Plan as a result of the objection.
MORNINGSIDE

Objection 138

We are satisfied that inclusion of the objection site of 3.73 hectares is significantly out of scale with this small settlement in that its inclusion would almost double its size. We agree with the Department that its inclusion would significantly extend development out to the west of Ballynahinch Road, which defines the settlement limit on this side. We do not agree with the objector that the existing development on the objection site extends development to the west as the 2 existing dwellings and sheds on the central portion of the objection site are well screened, low lying and secluded within existing mature vegetation and we judge that overall the objection site visually relates to the open countryside rather than the built development within the settlement limit on the opposite side of the Ballynahinch Road.

Whether the site is suggested for housing or commercial purposes, we consider that it is not suitable for inclusion within the settlement limit. The objector states that the previous use of the existing development on the objection site was a garden centre production area and that commercial activity continues on the site. A garden centre does not have to be located within a settlement limit and they are often in the countryside. We do not agree with the objector that the inclusion of the objection site within the settlement limits would constitute a planning gain. We note the presence of public sewers and the fact that the settlement is on a public transport route, but these factors do not outweigh our conclusions.

Objections 181, 182 and 183

We consider that the inclusion of objection site 181 to the north of the settlement limit would extend development to the north along the Ballynahinch and Limehill Roads and constitute urban sprawl. The settlement limit to the north is defined by curtilages and beyond this the objection site which is well screened from the road is read with the open countryside to the north, west and east. We consider that its inclusion would neither consolidate nor keep the settlement limit compact.

Objection site 183 stretches across the rear of 10 roadside dwellings and their curtilages which address Ballynahinch Road. Due to its scale we do not agree that its inclusion within the settlement limit would constitute small scale rounding off or modest infill. It would result in a large expansion of the settlement contrary to our strategic conclusion that there should be little growth in small settlements.

In the context of our strategic conclusions on the role of small settlements, we attach little weight to points raised by the objector such as its convenience to schools and churches and the M1 and that there are main services, street lighting etc.

Objection 182 related to LLPA Designation MS 02 that relates to four 1920/30s houses set within long deep plots with various mature trees scattered along the boundaries. The objection did not explain why it is irrational that the gardens of 177-183 have been designated as an LLPA in seeking its deletion. In the absence of any evidence or reasoning justifying its deletion we recommend that the LLPA Designation MS 02 is confirmed.
Planning Appeals Commission

We recommend no change to the Plan as a result of these objections.

ST. JAMES

Objection 797

This site extends to 10.5 hectares and its inclusion within the development limit would increase the size of the settlement several times over. We have concluded strategically that development in small settlements should be strictly curtailed. We do not agree that the site would represent a natural extension to the existing settlement because of its size. This is not a town and so arguments regarding phasing and buffers between town and country are not relevant. The presence of the new school and offer of some social housing does not justify such large scale expansion as is proposed in the objection. We recommend no change to the Plan as a result of this objection.

THE TEMPLE

Objections 134, 731 and 1752

These objections relate to lands on the opposite side of the main A24 from the defined settlement in the Plan. We consider that these lands are divorced from the settlement and therefore should not be included. The lands are also extensive and would result in a major expansion of the settlement if included. The Hotel premises are now closed and are significantly to the north of the settlement, being 200m from the Saintfield Road junction. Its use can continue and any re-development proposals can be assessed under regional policy for the countryside. Its presence does not outweigh our consideration of the objections. We recommend no change to the settlement limit on the west side of the A24 as a result of these objections.

These objection sites also included a car sales garage across the road from the former hotel. The garage is 80m north of the settlement limit and its inclusion would represent an isolated “island” separate from the settlement. We do not consider that this is acceptable in terms of settlement form and recommend that the garage remains outside the limit.

Objection 4276

We have considered the area coloured red on the planning history map that was supplied, presumably as the map identifying the objection site. The site contains mature vegetation that forms an attractive approach to the settlement and good definition for the settlement limit. There are some ruins of small buildings hidden within the trees but these would not justify an extension of the settlement limit to include the site. There are no buildings beyond the site and we consider that the limit is well defined on this approach to the settlement. We recommend no change to the Plan as a result of this objection.
Objection 3130

The site was reduced in extent in both submissions by different agents for this objection. We consider that either reduced objection site is still of excessive size relative to the overall size of the settlement. Its inclusion would almost double the size of the settlement and result in considerable growth to the north east and excessive urban sprawl. We note that the justification of the settlement limit is to consolidate the settlement, prevent further development along the Carryduff Road and the Saintfield Road and include the Temple shopping complex. Inclusion of the objection site would extend development considerably into the open countryside to the north east and push development along the Saintfield Road. We attach no weight to the objector’s proposals for development within the objection site in 3 phases as this makes no difference to the overall size of the objection site. Its inclusion would not achieve consolidation or a compact settlement form. The reduction of the site has removed it from Designation LN 01/65 The Temple SLNCI and consequently there is no objection to this designation.

Objection 3375

The Department conceded that portion A of the objection site 3375 should be included within the settlement limit to reflect the approval on the western part of the site for the redevelopment of a filling station incorporating a supermarket and café, car wash, storage and associated landscaping (S /1999/0286/F). The filling station re-development has now been completed and the building appears to follow the footprint of the building as shown on Map 43/001. We consider that there is no need to include ancillary structures such as recycling facilities in the settlement limit. The limit needs to be tightly defined around small settlements and only built development needs to be included. We recommend that the Department reviews the limit at this location so that it reflects the new building on the site. We cannot agree that all of portion A should be included. We do not therefore agree with the objector that it is logical to include the remaining part of the objection site B within the settlement limit. Despite the fact that the eastern boundary of the objection site is defined on the ground whereas the supermarket boundary is poorly defined on the ground, the inclusion of portion B within the settlement limit would not constitute rounding off of and would result in a significant expansion of the settlement.

Recommendation

We recommend that a portion of the objection site 3375 equating to the Supermarket/filling station as built is included within the settlement limit of The Temple and the remainder of the site continues to be excluded.

TULLYNACROSS – See Lagan Valley Regional Park Volume
UPPER BROOMHEDGE

Objection 3200

The objector states that inclusion of the objection site would reflect development on the opposite side of the road and would provide a natural rounding off. However, we consider that the inclusion of the site would extend development along the Halfpenny Gate Road breaking across open countryside to the west and linking up with the 3 existing dwellings to the west of the settlement limit resulting in further elongation of the settlement form. The northern boundary of the objection site is undefined and therefore the site provides no visual containment for development to its northern edge. We recommend no change to the plan as a result of this objection.

SUGGESTED NEW SMALL SETTLEMENTS

The criteria for designating small settlements are set out in paragraph 2.2.13 of Part 1 of our report. Our recommended new small settlements in Lisburn District are listed in paragraph 2.2.14. All that remains is to consider the extent of the boundaries for the 3 settlements. The aim of the plan is to consolidate development within the small settlements and that settlement development limits should be drawn to prevent any further encroachment into the open countryside, with no further land being provided for expansion.

Carr (objection 3459)

We agree with the Department that the objection lands are too extensive and with the Department’s proposed settlement limit. This draws the settlement limit around 2 separate tight clusters of development, the first is at the junction of the Comber Road/ Front Road and the Ballycarrangannon Road - which comprises of a number of houses and Carr Baptist Church and the second is at the junction of Comber Road and the Carr Road, which comprises of a number of dwellings and Carr Primary School. We agree that the large extent of land to the north – west is open countryside and is prominent and exposed from the Comber Road. This open swathe of land visually relates with the open countryside to the north and south rather than the built form. We also consider that even the reduced site presented at the inquiry linking the 2 clusters would result in the spread of development into prominent and open countryside and would not achieve the objectives of consolidation. The industrial units to the north west are visually well separated from the 2 clusters of existing development and are too detached to be included within the proposed new settlement limit of Carr.

Recommendation

We recommend that the boundaries of the new small settlement at Carr are as shown on Map 12.
Ballycarn (objection 3366)

We agree with the Department that the objection lands are too extensive and with the Department’s proposed settlement limit. We agree that the inclusion of the Rectory site and two properties to the West of Dow’s Road would not result in compact form and would extend development into open countryside. We also consider that the settlement limit should be drawn tightly along the eastern side of curtilages of the dwellings along Dows Road as inclusion of the strip of land to the rear would extend development to the east unto open countryside to a line which is not defined on the ground. The rear of the curtilages provides a strong defensible edge to the settlement limit.

**Recommendation**

We recommend that the boundaries of the new small settlement at Ballycarn are as shown on Map 13.

Crumlin Road/ Station Road / Ogale’s Road, Ballinderry (objection 3438)

We agree with the Department that the objection lands are too extensive and agree generally with their proposed tighter limit. The extent of the objection lands offers potential for considerable expansion of the limit which we consider to be unacceptable. We agree with the Department that the inclusion of a single dwelling separated by a roadside plot to the north western side of Crumlin Road does not constitute compact form.

Whilst the Department has attempted to draw the settlement limit tightly around roadside development on the eastern side of the Crumlin Road and north of Station Road it does not accurately reflect the situation on the ground. We consider that the hard standing car park to the rear of the vacant pub, along with the roadside property and curtilage to the north of the car park could be included within the limit. Objection lands beyond this to the east and the northern side of Station Road are prominent and open and should be outside the limit. The settlement limit should be drawn tightly around existing development to the south west of the junction. The Department has included a dwelling within their suggested limit that was not in the original objection site and so cannot be considered for inclusion by us. No name was suggested for the new small settlement. The description in the objection is not appropriate for a settlement. We recommend that the Department devises an appropriate name.

**Recommendation**

We recommend the boundaries of the new small settlement at Crumlin Road/ Station Road / Ogales Road, Ballinderry should be in accordance with Map 14.
COUNTRYSIDE

Lands at Stoneyford Road, Stoneyford (objection 439)

The objection site lies several kilometres outside Stoneyford, adjacent to the B101 (Lisburn to Nutt’s Corner), albeit within a 40 mph speed limit area. It is also many kilometres from the Lisburn City development limit. The objection seemed to indicate that the lands should be identified for social or general housing or employment purposes in the plan. These lands that are currently in use for agriculture and as a dwelling are located in the countryside remote from any settlement. We consider that they should not therefore be zoned for the uses sought. The presence of a concrete plant nearby does not alter our assessment. This plant is not zoned for industrial use as claimed by the objector and the site is separated from it by another dwelling. The site could not be considered as an extension of the plan. The strategic arguments regarding the need for more housing land have been addressed in Part 1 of our report and could not justify zoning this site as suggested. We recommend no change to the Plan as a result of this objection.

Lands at Halfpenny Gate Road (objection 3024)

The site is in the countryside between the small settlements of Lower Broomhedge and Halfpenny Gate. It is removed from any settlement limit and so cannot be considered for inclusion within a limit. It is unclear to what limit the objection is referring. This site was not zoned for development in Lisburn Area Plan. We recommend no change to the Plan as a result of this objection.

Lands known as Sion Hill, Hillsborough (objection 3449)

The Department has withdrawn Policy COU 1 from the Plan. The remaining issue relates to the identification of a DOS on these lands. The site is agricultural land in the countryside outside any development limit. We have concluded in Part 1 of our report under Policy SETT 5 that there is no justification for DOS to be designated outside development limits. This site is in such a location and so cannot be considered for designation as a DOS. A proposal for a hotel can be considered under regional policy. We recommend no change to the Plan as a result of this objection.

NATURAL ENVIRONMENT

DESIGNATION LN01 – SLNCIs

Objection to Designation LN 01/02 – SLNCI at Ballycarngannon Road (objection 2025)

The original objection referred to several strategic countryside and environmental policies, which were considered in the strategic section of our report. We are not considering objections to AOCDMs following our conclusions in the countryside chapter of our strategic report. The objection to the SLNCI was based on the impact on Temple Quarry of the designation. The only site that was identified was the SLNCI itself, which consists of two small triangles of land. There was no explanation of why the SLNCI designation was not warranted. The stage 2 submission states that the objectors do not intend to submit any evidence at this stage. The Department confirmed the basis for
the designation was that the area consists of fen and grassland and that fen is a Northern Ireland priority habitat. There had been no change in the characteristics or circumstances of the site. In this evidential context, we see no basis for the removal of the SLNCI designation and recommend no change to the Plan as a result of this objection.

Objection to Designation LN 01/06 – SLNCI, Ballymacricket (objection 658)

The objector objected to the fact that his house was included in the SLNCI. The Department accepted that an error had been made and indicated that the boundary should be revised to omit the dwelling. We have no reason to depart from this conclusion. As the Department has omitted the dwelling from the SLNCI, the natural heritage of mature trees in the garden is a matter for their attention and not for the plan. We can not address amendments to a technical supplement as the Department have suggested we do in their submission.

Recommendation

We recommend that the boundary of SLNCI Designation LN 01/06 – Ballymacricket is revised as shown on plan 15.

Objections to Designation LN 01/11 – SLNCI Belfast Hills – White Mountain (objections 2030 & 1511)

The original objection 2030 referred to several strategic countryside and environmental policies, which were considered in the strategic section of our report. We are not considering objections to AOCMDs following our conclusions in the Countryside and Coast chapter of our strategic report. The objection to the SLNCI was based on the impact on Whitemountain Quarry of the designation. The objectors' stated in their stage 2 submission that “We have no site specific objections to raise with the Commission and continue to rely on the evidence that was submitted at stage 1 of the inquiry”. The Department confirmed that planning permission has been granted for development within the proposed SLNCI and that development would destroy the nature conservation interest on that part of the SLNCI. We were requested to recommend that the part of the site that is included within the planning permission should be removed from the SLNCI designation. However, the Department has since confirmed that the Plan should not be changed in response to this objection. There was no explanation for the change of opinion.

Objection 1511 argued that the SLNCI should have been extended to include all of a disused quarry known as Aghnahough quarry and a feature locally regarded as a Motte and Bailey on Whitemountain Road. They seemed to indicate that the SLNCI should include all of the area shown on the designation map (Map No. 46/011). The Department’s view was that the Plan should not be changed as a result of the objection. We must conclude that the Department has assessed this area and concluded that it is not worthy of a designation. We do not accept that a working quarry with little nature conservation interest and planning permissions that may destroy some of the little remaining interest should be included in the SLNCI. We also note that Mullaghglass Quarry (referred to as a comparator by the objectors) SLNCI is recommended for deletion by the Department. A Motte and Bailey is not a feature of nature conservation interest and the trees thereon can be safeguarded by means of a Tree Preservation Order, if necessary. Belshaw’s Quarry National Nature Reserve is some distance from
Planning Appeals Commission            Article 7

this area. There was no convincing evidence of the importance of the area for Kestrels, bats or badgers all of whom may forage over a wide area. This does not mean that the foraging area is worthy of protection as a SLNCI. We recommend no change to the Plan as a result of these objections.

Objection to Designation LN 01/49 – Mullaghglass Quarry (objection 2077)

The original objection referred to several strategic countryside and environmental policies, which were considered in the strategic section of our report. It also refers to several designations related to the site including Mullaghglass Quarry SLNCI (LN 01/49), Belfast Basalt Escarpment AOHSV (COU 06/04) and North of Belfast Basalt Escarpment AOCMD (LN 03/01). We are not considering objections to AOCMDs following our conclusions in the countryside chapter of our strategic report. However, the objectors’ confirmed in their stage 2 submission that they have no site specific objections.

Notwithstanding the above the Department raised one issue worthy of further comment and that was in relation to Mullaghglass Quarry SLNCI (LN 01/49). Apparently planning permission has been granted for development within the proposed SLNCI and that development would destroy the nature conservation interest on that part of the SLNCI. We note that the site is in use as a landfill facility. We were requested to recommend that the part of the site that is included within the planning permission should be removed from the SLNCI designation. The information provided by the Department seemed to indicate that all of the SLNCI is affected and the Designation should be deleted. As noted above, the objectors have indicated that they are not pursuing this objection. As there is no objection we cannot make a recommendation.

Objections to Designation LN01/60 – SLNCI, Slievenagravery (objections 1379, 1476, 1480, 1484, 3099 & 3102)

Objection 1379 identified a large portion of the SLNCI designation and stated that the objector did not want any more restrictions placed on the way he carries out his farm business. The Department has since confirmed that the NW portion of the objection site is not worthy of inclusion within the SLNCI and we recommend its removal. This will at least partly address the objection. In relation to the remaining portion of the site, no evidence was supplied as to why the identified area did not warrant inclusion in the SLNCI. A SLNCI designation does not prevent farming activities from continuing. There is no evidential basis for us to consider in relation to this objection.

The remaining objections from members of the same family identified land on their farm within the proposed SLNCI. Part of the site is a new bungalow and garden belonging to a son of the family. The remainder of the lands were stated to comprise new woodland, a poultry unit and farm yards/tracks. The Department indicated that there were indeed conifer plantations, areas of grassland and a number of buildings within the SLNCI boundary that did not merit the designation and should be excluded. Almost all of the objection lands have been excluded by the Department. The only exception is a small triangular area adjacent to the road. We would question the value of this small area on its own and recommend that this entire portion of the SLNCI is deleted. The Department’s change of stance does raise the question as to why these lands were included in the first instance. Nonetheless, we accept that an error has occurred and agree with the parties that these lands should be excluded from the SLNCI, plus the small triangular area noted above.
Recommendation

We recommend that the boundary of SLNCI Designation LN 01/60 - Slievenagravery is revised as shown on plan 16.

Objection seeking an additional SLNCI Designation (objection 1856)

This objection by the RSPB referred to a portion of the floodplain of the River Lagan south of Halfpenny Gate and Upper Broomhedge (between New Bridge and Spencer’s Bridge). It states that these lands are often inundated in winter and attracts internationally important numbers of Whooper Swans. Bewicks Swans and Widgeon also occur here it is claimed. We do not have sufficient information as to the importance of this site to enable us to recommend that it be designated.

EMPLOYMENT

Objection to Zoning LN08 – Existing Employment/Industry, Glenavy Road, Moira (objection 3718)

This former quarry was zoned for industrial use in the Lisburn Area Plan 2001. The site has been partly developed with several large warehousing units constructed on the site. There is no information provided as to the basis for the objection. In the context of the development of the site having commenced we can see no reason to omit the industrial zoning from the plan. We recommend no change to the Plan as a result of this objection.

Objection Seeking Additional Employment Land
Lands at Maghaberry Airfield (objection 2961)

The objection relates to an extensive area of land that was formerly an airfield and an industrial estate until the land was vested as part of the prison development in the 1970s. Many of the buildings on the site were thereafter demolished for security reasons (objector’s unrebutted evidence). The land reverted to the objector’s client in 1998. There are several large factory buildings near the site and the prison itself.

The objection seeks an industrial zoning on a small part of the site formerly used for industrial purposes that would have continued but for the vesting of the land in connection with the prison. The remainder of the site would be a landscape enhancement area, funded by the industrial use. The Department accepted this argument and conceded the objection at the hearing because of the former use of the site and the fact that it was vested from the owners. This concession was subject to key site requirements that would ensure that the landscape enhancement was secured.

The objector quoted from the Northern Ireland Landscape Character Assessment where it is stated that the area could benefit from mass planting whilst maintaining the open defensible area around the prison. There is no doubt that the site presents somewhat of a derelict appearance. However, it is quite open as there are few buildings on the site. We do accept the reasons for this related to security considerations at the time it was intended to extend the prison onto the site. Landscape enhancement areas were
Planning Appeals Commission

identified in Lisburn Area Plan 2001 and part of the site falls within such an area. There is no regional policy basis for landscape enhancement, but this does not mean that its benefits cannot be considered. There is landscape assessment support for enhancement and it could restore the quality of the area prior to its use as an airfield in WW2. The benefits to the area must count in favour of the proposal. However, they must be weighed against the available views of the degraded landscape. The views from Maghaberry Road consist of the Steel factory and two small war-time buildings. The landscape enhancement area to the rear is not prominent due to the landform in the area. The former runways and any old buildings further to the north are not readily visible to public views. They are visible in views from Hallstown Road, albeit set well back from the road. But they are seen in the context of agricultural buildings and industrial units along this road that are not in the objection site. The new buildings on the runway are not prominent in this context and do not appear much different to agricultural type buildings. Taking these views in the round, we consider that any marginal gains in landscape enhancement would be more than countered by the industrial estate that would be allowed alongside Maghaberry Road. The barely perceptible benefits of landscape enhancement would not outweigh the impact on the countryside of a new industrial estate. We consider that the existing Steel factory appears as an isolated factory in the countryside, which is a common occurrence throughout Northern Ireland. This does not mean that it should be used as the basis for a whole estate of such units. The former use of the lands for industrial purpose ceased with the vesting and presumably the landowner was compensated at the time. That chapter in the planning history of the site has closed and cannot be re-opened as the parties seem to think. We do not consider that it justifies an employment zoning on this site now. There are precedents for existing industrial areas to be designated in the countryside. Examples include LN08 at Glenavy Road and Marylands Industrial Estate near Crossnacreevy. We do not agree that this site is comparable because it does not contain an existing industrial estate.

We do not consider that this is the type of location where a DOS would be appropriate. It is not within a city or town centre or indeed a built-up area at all. Designation of the entire site as a DOS would not conform to the avowed intention to restrict development to part of the site and to undertake landscape enhancement on the remainder.

We recommend no change to the Plan as a result of this objection.

OTHER OBJECTIONS IN THE COUNTRYSIDE

Designation LN 09 – Strategic Land Reserve of Regional Importance at the Maze (objections 754/4, 2022/35 & 3824/11)

We note that the Adjustments to the RDS – 2025 (June 2008) at ECON 1.4 identified the Maze as a site of regional significance for the economy of Northern Ireland. Lisburn City Council’s (objection 2022/35) concern related to the impact on local communities amidst a fear that these issues would be lost in a major scheme promoted by a Government Department. They requested that an additional sentence be added to the bold text as follows: the development should respect the local context and be integrated with adjoining communities and the Lisburn urban area. We consider that the plan makes it clear that the lands are merely safeguarded in order that their full regional potential can be realised. In this context we do not agree that the additional sentence is required. The plan does not provide for the development of the site and so the issue of
integration with Lisburn City Council area does not arise. We also consider that these are issues that would have to be addressed under existing regional policy in the formulation and consideration of any proposals for the site.

Future uses of the site and road linkages are detailed matters that will be considered as part of any proposals for the site. The plan stipulates that the development of the site must be of strategic regional importance. It is difficult to envisage a development of this type that would not include employment uses of some form or other. We are sure that major development on the site would involve consideration of the road linkages to the site.

We recommend no change to the Plan as a result of these objections.

Lands adjacent to Moira Roundabout (J9 on M1) - Objections 712, 1904 & 3014

Both objections 712 and 3014 sought a park and ride facility on the sites identified. The location of park and ride sites has been chosen in BMTP. This site has not been chosen as a suitable candidate. We are aware that sites on the M1 corridor have been provided at Sprucefield and Blacks Road. Another is planned at Kennedy Way. In view of its location remote from the cities, it would not be an appropriate site for a park and ride facility. There is also a train station located nearby in Moira. No further evidence was advanced to support the proposal.

Objection 712 does not make clear as to what the objection relates or what the objection is seeking to achieve. Various uses are discussed including a hotel, motorway services type facilities and a farmers’ market. The plan does not identify sites for these types of facilities in the countryside. We do not consider that the site should be identified for these types of uses in the plan. No justification was provided to explain why it should do so. The policy references from the RDS are all general statements and provide no justification for the proposals contained in the objection to be included in this plan. We note that there are existing services (petrol filling station and restaurant) a short distance to the north on the A26. We consider that proposal such as this can be assessed under prevailing regional policies as part of the development management process.

Objection 1904 sought an allocation as a cemetery and crematorium on adjacent lands between the A3 and the railway line. The Department withdrew Policy PU 1 and associated Designation from the Plan. We therefore consider that a proposal for a cemetery in the countryside can be assessed under regional policy and normal material considerations. We were presented with no justification in support of the objection, in any event. We note that the associated planning application was dismissed at appeal in 2007.

We therefore recommend no change to the Plan as a result of these objections.
APPENDIX 1

PLANS

Plan 1 Objections 2137 - Lands at Glenavy Road, Lisburn.
Plan 2 Lands at Plantation, Lisburn.
Plan 3 Objection 2905 - Wetland to be protected, Lisburn.
Plan 4 Objections 770 and 2996 - Lagmore.
Plan 5 Dairy Farm District Centre, Metropolitan Lisburn.
Plan 6 Land Ownership Springbank Industrial Estate.
Plan 7 Amended Boundary for LLPA BT 120/MP 09.
Plan 8 Objection 697 Moybrick Road, Dromara.
Plan 9 Zoning DA 04 - Rathfriland Road, Dromara.
Plan 10 Amended Boundary for Glenavy Area of Village Character (Designation GY 08).
Plan 11 Objection 3528 - Maghaberry.
Plan 12 New Small Settlement - Carr.
Plan 13 New Small Settlement - Ballycarn.
Plan 14 New Small Settlement - Objection 3438.
Plan 15 SLNCI Designation LN 01/06 - Ballymacricket.
Plan 16 SLNCI Designation LN 01/60 - Slievenagravery.
Belfast Metropolitan Area Plan 2015

PAC Ref: 2905

MBA Ref: 111

Date of Local Public Inquiry Session: 5th December 2007.

At this inquiry session an area of wetland was referred to by Natural Heritage, Environment and Heritage Service. Participants agreed that if the objection lands were to be zoned for housing it would be reasonable to include a Key Site Requirement to retain this wetland area. It was also suggested that the location of the wetland area could be identified in the plan and cross referenced to the associated Key Site Requirement.

Below is a map that indicates the location of the wetland area (Compartment A1 which is in the south-eastern corner of the lands in question).

Dr. Mark Hammond

5th December 2007

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SITE CODE: IJ26WFB

NAME AND ADDRESS: Wet fields - Ballinderry Road, Lisburn
Belfast Metropolitan Area Plan 2015 - Draft Plan
Map No. 4/127 - Collin Glen Local Landscape Policy Area

| Local Landscape Policy Area |
| Settlement Development Limit |
| Council Boundary |

LLPA BT120
Objection BMAP/3924/9/2
Suggested Amendment to LLPA BT120.

Submitted 30/10/07
Appendix 3:

Belfast Metropolitan Area Plan 2015 - Public Inquiry
Appendix 3 - Ballycarn

Proposed Settlement Development Limit

PLAN 13
BALLYCARN
Appendix 3  Proposed Settlement Development Limit

Belfast Metropolitan Area Plan 2015 - Public Inquiry
Appendix 3 - Crumlin Road/Station Road/Ogates Road Crossroads, Ballinderry, Lisburn

PLAN 14
3438