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

PART 2

REPORT ON CASTLEREAGH BOROUGH COUNCIL AREA

by

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

Date of Report: 8th July 2011
<table>
<thead>
<tr>
<th>CONTENTS</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approach to Key Site Requirements and Notes</td>
<td></td>
</tr>
<tr>
<td>List of Abbreviations</td>
<td></td>
</tr>
<tr>
<td><strong>METROPOLITAN CASTLEREAGH</strong></td>
<td>1</td>
</tr>
<tr>
<td>Housing</td>
<td>1</td>
</tr>
<tr>
<td>- Objections seeking additional housing lands</td>
<td>1</td>
</tr>
<tr>
<td>- Castlereagh</td>
<td>1</td>
</tr>
<tr>
<td>- Dundonald</td>
<td>13</td>
</tr>
<tr>
<td>- Objections to Housing Zonings</td>
<td>21</td>
</tr>
<tr>
<td>Employment</td>
<td>29</td>
</tr>
<tr>
<td>Transportation</td>
<td>37</td>
</tr>
<tr>
<td>Retailing</td>
<td>43</td>
</tr>
<tr>
<td><strong>Urban Environment</strong></td>
<td>47</td>
</tr>
<tr>
<td><strong>Natural Environment</strong></td>
<td>53</td>
</tr>
<tr>
<td><strong>Open Space</strong></td>
<td>58</td>
</tr>
<tr>
<td><strong>Education, Health and Community Facilities</strong></td>
<td>60</td>
</tr>
<tr>
<td><strong>CASTLEREAGH TOWNS</strong></td>
<td></td>
</tr>
<tr>
<td><strong>CARRYDUFF</strong></td>
<td>61</td>
</tr>
<tr>
<td>Housing</td>
<td>61</td>
</tr>
<tr>
<td>- Objections seeking additional housing lands</td>
<td>61</td>
</tr>
<tr>
<td>- Objections to Housing Zonings</td>
<td>69</td>
</tr>
<tr>
<td>Employment</td>
<td>71</td>
</tr>
<tr>
<td>Retailing</td>
<td>75</td>
</tr>
<tr>
<td>Natural Environment</td>
<td>77</td>
</tr>
</tbody>
</table>
CASTLEREAGH VILLAGES

MONEYREAGH 78

CASTLEREAGH SMALL SETTLEMENTS

BALLYKNOCKAN 80
CROSSNACREEVY 81
RYAN PARK 82
SUGGESTED NEW SMALL SETTLEMENTS 83

CASTLEREAGH COUNTRYSIDE

EMPLOYMENT 85
OTHER RURAL DESIGNATIONS 85

APPENDIX 1
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 inforamatives 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.
List of Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<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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<td>BUAP</td>
<td>Belfast Urban Area Plan</td>
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<td>CBC</td>
<td>Castlereagh Borough Council</td>
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<td>DGBA</td>
<td>Dundonald Green Belt Association.</td>
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<td>DOS</td>
<td>Development Opportunity Site</td>
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<td>EVGBA</td>
<td>Enler Valley Green Belt Association.</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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<td>LVRP</td>
<td>Lagan Valley Regional Park</td>
</tr>
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<td>MEL</td>
<td>Major Employment Location</td>
</tr>
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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>
</tr>
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<td>RDS</td>
<td>Regional Development Strategy</td>
</tr>
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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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<td>SLNCI</td>
<td>Site of Local Nature Conservation Importance</td>
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<td>STLR</td>
<td>Short Term Land Reserve</td>
</tr>
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<td>ULW</td>
<td>Urban Landscape Wedge</td>
</tr>
</tbody>
</table>
METROPOLITAN CASTLEREAGH

Objections to Designation MCH 01: Metropolitan Development Limit (Castlereagh)

General Objection to Development Limit

Objection 2038/1/2

Elevate submitted general objections to the restrictive nature of the Castlereagh Development Limit and Protected routes within the Metropolitan Area. However these objections are of a general nature and no specific arguments or lands were presented that would enable our further consideration of the matter.

HOUSING

Objections seeking additional housing lands

Lands to the south of MCH 07 - Knockbracken Healthcare Park

Objection 3384

Objection site 3384 sits directly to the south of Knockbracken Healthcare Park and comprises of 2 distinct parts divided by Mill Road West.

Objectors sought its inclusion within the development limit for housing and its exclusion from the AOHSV. The objection site contains undulating landform including prominent elevated and sloping ground. Any development would have an adverse impact on these features and on the landscape setting and character of Castlereagh and surrounding countryside. We consider that inclusion of this significant site would form a large irregular extension of development into the open countryside and the creation of poorly defined settlement edge. We consider this to be the case even if developed in pockets within carefully landscaped boundaries as proposed by the objector. We consider the objection lands to form an integral part of the AOHSV due to topography, location and landscape attributes. These lands are important to the setting of the urban area and we consider that development thereon would constitute urban sprawl which would have an adverse impact on that setting.

2 SLNCIs lie within the objection site and development would have an adverse impact on these features. We recommend no change to the plan.

Objections 1508 and 3080

In view of our conclusions for 3384, objection site 1508 is isolated and somewhat detached from the settlement limit. It would be illogical to include it within the settlement limit as it is free standing and unrelated to the existing urban form. We recommend no change to the plan.
Objectors for site 3080 sought the inclusion of the site to the southern side of the Knockbracken Healthcare Park within the settlement limit as a DOS (mainly industrial and residential) and its exclusion from the AOHSV and SLNCI 8g. However this SLNCI does not seem to overlap with the objection site and is therefore not applicable. This site is isolated and detached from the settlement limit and it would be illogical to include it within the limit. There was no evidence presented that would justify the exclusion of the objection site from the environmental designations. As we have rejected the inclusion of the site within the development limit, no further consideration of the DOS is required. We recommend no change to the Plan.

**Lands at Knockbracken Road**

**Objections 548, 139**

Objection site 139 (0.99 hectare) abuts the development limit on its western and north western boundaries. The south eastern boundary is defined by vegetation. The objection site lies within the RLW. The objection site is not visible from the Saintfield Road and would be partially visible from the Knockbracken Road on approach from the east. We consider that development of the site would have a localised visual impact. We consider that the function of the RLW would not be prejudiced if the site was developed and included within the development limit. Its inclusion would not bring development any closer to the boundary at Carryduff. We consider that inclusion of the objection site would constitute rounding off of the development limit.

The site has no road frontage and Roads Service find it unacceptable as access cannot be achieved. We note that the objector has proposed access from Brackenwood Crescent however it is not specified how this is to be achieved. There do not seem to be any points in Brackenwood Crescent from which an access to the objection site could be created and on this reasoning we consider the site unsuitable for inclusion. We recommend no change to the plan.

Objection site 139 sits to the south west of the junction of Ballymacaconaghy Road and Knockbracken Road. The site is also within the RLW. It is approx 1.83 hectares and abuts the development limit only on its northern boundary. It would appear that its eastern portion has already been built on and contains an extension to the church and associated training school and car park. The objection site sits on the eastern edge of a cluster of dwellings and community buildings. The land falls to the west to a laneway and farm buildings. The objector argues that development of the site would consolidated the existing cluster of dwellings and community facilities. We do not agree and consider that development on the objection site would extend the cluster at the junction to the west and south creating sprawl towards the farm buildings sitting at the lower level. Development on the objection site would visually link the cluster to the east with the farm buildings to the south and west and collectively would read as a significant visual encroachment into the RLW. This would be detrimental to the function of the wedge when viewed from the Knockbracken Road.

The development limit to the north of the objection site is defined by the Knockbracken Road and none of the cluster of buildings at the junction or farm buildings to the west are included within the development limit. The inclusion of the
objection site would read as an illogical protrusion of the development limit. For these reasons we cannot recommend the inclusion of the objection site within the development limit and recommend no change to the Plan.

**Lands east of Ballymaconaghy Road, Manse Road and Garland Hill**

**Objections 3704, 3382, 54, 55**

We will consider these 4 sites together which lie to the east of Ballymaconaghy Road within the extensive proposed AOHSV. Objection site 3704 (12 hectares) has a site frontage of 600/700 m and is approx 200 m in depth. The original objection site 3382 was 34.7 hectares however the objector sought only part of the land to be identified for housing, the remainder of which will be retained as golf course. This developable area (approx 8.5 hectares) contains the disused ski slopes, a golf driving range and buildings associated with the golf course and a church building. There is an expired planning approval for an 80 bedroom hotel on the driving range. This objection site wraps around to the rear of objection sites 54 and 55 which are 2 adjacent small road frontage sites 0.83 and 0.53 hectares respectively. Objection site 54 consists of a single dwelling set within a large garden and a small field adjacent to the south. Objection site 55 consists of a single dwelling in a large garden.

Viewed from the Ballymaconaghy Road, the Knockbracken Country Club and driving range and associated buildings with large car parks, disused ski slopes, church and houses read as part of the wider urban area. We consider the lands to be distinguishable from the adjoining lands in the extensive proposed AOHSV. We agree with objectors that there is a feeling of urbanisation along the eastern side of Ballymaconaghy Road.

The objection sites gently rise to the east and are on a similar level to the developed housing at Laurelgrove on the opposite side of the road and we consider that the objection sites are not visually prominent when viewed from the Ballymaconaghy Road.

Collectively these objection sites lie into the landform within a ‘saucer’ and the lands rise to the east beyond. The slopes of the hills do not start to rise until significantly beyond the objection sites.

We consider that provided development was kept below the 140m contour line as proposed it would be seen against the backdrop of rising ground in the distance which is the justification for the designation of AOHSV. The golf course and rising parkland setting would provide the immediate backdrop to the northern portion with the slopes of the proposed AOHSV in the distance.

Views of the developed site from the higher level at Lisnabreeny Road to the north would be read against the extensive built up area within the settlement limit. Views from the Knockbracken Road are also limited and overall views of development on the site would be relatively localised.

Due to the extensive nature of the AOHSV and the localised topography as outlined above, we consider that the function of the AOHSV would not be prejudiced if the site was excluded.
To the east of objection site 3704, a new development limit would be defined by mature overgrown hedgerows with occasional trees. The eastern boundary of 3382 is irregular on the ground wrapping around the rear of the disused ski slope, around the front of the Country Club and across an undefined portion to the rear of the driving range. In view of the parkland setting provided by the golf course to the east, the irregular boundary formed by the objection site would be of limited visual impact. The provision of buffer planting to the settlement edge is covered by regional policy and in this case would require the strengthening of existing vegetation and defining new boundaries where required.

In view of our assessment about the suitability of the lands for development we disagree that the road should provide a stopline to development. We note that the Ballymacanaghy Road has been constructed to an urban standard as far as approximately midway along the road frontage of objection site 3704 which will provide spare infrastructure capacity for the development.

In addition, the site is in a sustainable location served by public transport, reasonably close to Cairnshill Park and Ride, the SuperRoute and employment zoning MCH 07. Once the link through MCH 03/11 is completed public transport penetration will be further improved.

In view of the Department’s evidence that the Saintfield Road Relief Road is not a developer led scheme, we need give no further consideration to the developer’s offer of a contribution for infrastructural improvements in the general area.

We consider that inclusion of any of these objection sites individually within the development limit would be unacceptable as each would present an illogical protrusion of the development limit. We consider, however that in combination the sites represent a logical extension to the development limit in this location. It is therefore necessary that all 4 sites are brought together within the development limit as a single zoning of approx 22 hectares.

**Recommendation**

We recommend that the sites are brought within the development limit as a single zoning for housing as shown on Plan 1, subject to the following KSRs:

- A Masterplan to facilitate the comprehensive development of the zoning shall be agreed with the Department.
- No development shall take place on any part of the site above 140m contour.

**Objections 2787, 3600, 3234**

Objection site 2787 relates to 3 portions of land. Portion 3 which also includes objection 3600 is a narrow elongated site of approx 4.85 hectares to the east of Manse Road. It lies within the proposed AOHSV of the Castlereagh Escarpment and outside the RLW. The objection site reads as part of the wider proposed AOHSV and we consider that any development on it would be detrimental to the integrity and openness of the AOHSV. The northern part of the site falls away from the road to the
east towards a stream whilst the southern part is slightly more elevated. Viewed from the Manse Road the objection site reads as very open and exposed as it has no defining roadside vegetation. There is a definite rural character to the eastern side of the Manse Road when viewed from the Four Winds roundabout travelling to the north and we consider that, in this context, the Manse Road provides a strong and logical edge to the development limit. We recommend no change to the plan.

Portion 2 is a small 1.12 hectare field lying adjacent to the north of the development limit at Garland Crescent. It is elevated above the Manse Road and rises from east to west. The northern boundary is undefined on the ground. The site lies within the proposed AOHSV and RLW. We consider that when viewed from the Manse Road any development within this elevated objection site would encroach into the RLW which would be unacceptable and would prejudice the functions of the wedge. Its inclusion would create an illogical protrusion of the development limit. The inclusion of objection site 3234 would further exacerbate this. Objection site 3234, lies at the junction of Manse Road and Glencregagh Road. It is elevated above Manse Road and defined with fencing and a planted bank. The site lies within the proposed AOHSV and RLW and any development on the objection site would be detrimental and have an adverse impact on these environmental designations. As we have found objection site 2787 (portion 2) to be unacceptable, the site on its own is isolated from the development limit and it would not be logical to bring it within the settlement limit.

Portion 1 is a small 0.94 hectare field lying adjacent to the development limit at Garland Hill, west of Garland Park. It abuts the settlement limit on 2 sides and is defined with mixed hedgerow to the west and north. In terms of urban form it would square off development and would not prejudice the functions of the RLW. However, the site does not have frontage to the road network and access is not available from existing development. As the site is isolated, further land would be required to facilitate a suitable access which is not the subject of any objection and no proposals for access were put forward. Therefore as access is not achievable we agree with the Department that this portion of the site is unacceptable and we cannot recommend its inclusion within the development limit.

We recommend no change to the plan in respect of these objections.

**Lands at Lisnabreeny Road East**

**Objection 2755**

This large objection site on the Lisnabreeny Road is isolated from the settlement limit and lies in open countryside. It would be illogical to include it within the settlement limit as it is free standing and unrelated to the existing urban form. Objections were also to its inclusion within the AOHSV – COU 6/08, Castlereagh Escarpment. The majority of this vast objection site lies within the AOHSV designation. No evidence has been advanced as to why the objection site does not merit inclusion within the AOHSV. We consider it to form an integral part of the AOHSV. We recommend no change to the plan.
Lands to the south of Glencregagh Road

Objections 3402, 906, 1268, 3061 and 3410

Objection 3402

This 3.64 hectare site was reduced at the Inquiry to a site approx ¼ of the original size. The original objection was for residential use (3402) and health use (906 & 1268). At the Inquiry the objector sought its designation for mixed use. The site is within the AOHSV and the RLW, CR 04 - Glencregagh.

The reduced site is within the 75 m - 85 m contour on a west facing slope. The Department state that the site is visually prominent and can be viewed from Galwally, Ravenhill, Ormeau Road with high visibility across the city. These are long range views and the visual impact has to be seen within the context of a wider panorama of development within the limit. Viewed in this context we do not consider the site to be visually intrusive. We would agree with the objector that from Galwally the objection site is difficult to see due to the intervening buildings and significant tree belts on the Forster Green site.

We consider that the objection site lies into the urban form and its inclusion within the development limit would be considered as rounding off of the development limit, notwithstanding the absence of definition of the northern boundary on the ground. In terms of the environmental considerations, we consider that inclusion of the site within the development limit would not prejudice any of the strategic functions of the RLW. Nor would it prejudice the strategic function or character of the AOHSV if development was kept below the 85m contour to avoid prominent land to the north.

The only remaining issue is access to the site. We find it surprising that no proposals for access were put forward for the reduced site. The Department suggested that an access could be taken via the Forster Green Site. However, this would be through the heavily treed and rising grounds of the LLPA and would be detrimental to the LLPA. There is no obvious alternative access from the urban area and on this reasoning we consider the site unsuitable for inclusion. Accordingly, we recommend no change to the Plan.

Objection 3061

This 0.38 hectare objection site immediately abuts the eastern site of objection site 3402 and its southern and eastern boundaries abut existing development at Mount Michael. It is overgrown with shrubs, small trees and thorn bushes. It is also within the AOHSV - Castlereagh Escarpment and the RLW. The objection seeks its exclusion from the RLW and the AOHSV and its inclusion within the development limit for housing.

The objection site sits within the 80-90 m contour on a west facing slope and although it is starting to encroach up the slope, development is proposed only within the southern part of the site. This sits into the urban form and we consider that the development of this objection site would constitute rounding off of development at Mount Michael contributing to a compact urban form. The Department raised long
range views from Galwally, Ravenhill, Ormeau Road and Malone Road. Some of these are very long distance views and the visual impact of development on the objection site would be seen within the context of an extensive panorama of development within the limit and would not be visually intrusive. From Galwally, development on the Forster Green Health Care site and extensive intervening vegetation would make it extremely difficult to distinguish development on the objection site. We consider that the site makes no contribution to the sense of separation sought by the RLW designation and inclusion within the development limit would not prejudice any of the functions of the extensive RLW. Nor would it compromise the AOHSV as the site plays no part in the general sweep of the Castlereagh Hills, due to its location and limited views. We consider the site to be an inappropriate location for a DOS. It would appear that access is available from Mount Michael Park (which was proposed) and a KSR would secure this.

At the Inquiry the Department suggested a KSR precluding development from the northern portion of the site. The objector agreed to this. Rather than attaching a KSR and including the entirety of the site within the settlement limit, which would result in an illogical protrusion of the urban limit into the open countryside, we consider that the northern portion should be excluded from the development limit.

**Recommendation**

We recommend that southern portion of objection site 3061 as indicated on Plan 2 is included within the development limit and zoned for housing, subject to the following key site requirement:

- Access to the site shall be from Mount Michael Park.

**Objection 3410**

This 2.45 hectare site lies to the southern side of Glencregagh Road and abuts the current limit on its southern side only. It contains a large dwelling and grounds and a number of fields to the south. The site is within the RLW and AOHSV. The northern part of the site rises steeply from the road to a hilltop to the southeast. The entire site is on elevated sloping ground and sits high within the Castlereagh Escarpment and can be viewed from distances such as Upper Galwally. We consider that given its prominent elevated position and high degree of visibility any development on the objection site would be detrimental to the functions of both environmental designations and have an adverse impact on the landscape setting and character of Metropolitan Castlereagh. In addition its inclusion would project development into the open countryside creating an illogical development limit. We recommend no change to the Plan.

**Objection 42**

Objection 42 sought the realignment of the development limit to include 2 properties - no 21 and 23 Glencregagh Road and gardens lying adjacent to the Glencregagh Road and exclusion from the RLW. The objection site lies on the southern side of the
Glencregagh Road. Notwithstanding the buildings on the site, extending the limit would create an illogical extension into the open countryside in terms of urban form.

Development on the objection site would have a degree of visual impact and would encroach into the RLW. We consider that this triangular objection site forms an integral part of the RLW and its exclusion would be detrimental to its strategic function. No evidence was forwarded to explain why the objection site did not merit inclusion within the RLW. We recommend no change to the plan.

**Lands at Rocky Road**

**Objections 1174 and 635**

Objection site 1174 has a frontage onto the Rocky Road and is elevated, commanding impressive views across the City. It lies within the AOHSV and the RLW. The site is physically separated from the development limit by some distance and it would not be logical to bring it within the limit. There is little existing development within the settlement limit at this elevation throughout Castlereagh. We agree with the Department that development of this site would not integrate well into the topography and landscape. It would represent an unacceptable visual intrusion onto elevated land which would be visible over some distance within the urban area. Development would adversely affect the character and overall integrity of the proposed AOHSV. Given this and its physical separation from the development limit, we are unable to recommend its inclusion within same. We recommend no change to the plan.

Objection site 635 lies to the western side of Rocky Road. It is approx 0.67 hectares in area and contains 2 dwellings, 1 with large mature gardens to the rear of the site. It lies within the AOHSV and RLW. SLNCI designations MCH 32/06 and 32/07 lie immediately to the west.

The northern portion is generally level but it falls towards the southern boundary and towards the SLNCIs to the west. There is mature vegetation to all boundaries and an overgrown meadow to the north east contiguous with the woodland associated with the glen immediately to the west.

The site abuts the development limit on its north and western boundaries and contains 2 dwellings and therefore we consider this small site to sit well into the urban form. The new development limit would be strong as its southern and eastern boundaries are defined by natural well vegetated boundaries.

Although the frontage of the objection site is visible from the Rocky Road, we consider that its development would have only a localised visual impact. We consider that the function of the RLW and of the AOHSV would not be prejudiced if the site was brought within the development limit. It is for these reasons that we recommend this site for inclusion within the development limit.

**Recommendation**

We recommend that objection site 635 is included within the development limit.
**Lands at Orchardvale**

**Objections 53 and 3426**

These 2 sites are adjacent to each other to the rear of Orchardvale. Objection site 53 is 2.3 hectares in area and abuts the development limit on its northern and eastern boundaries.

Objection site 3426 is a 4.37 hectare site and extends further to the south east. Both sites rise steeply in a south easterly direction and are heavily vegetated with bushes and trees and grassland.

They are within the AOHSV and SLNCI designation MCH 32/11. The sites are on very steep ground facing north east and sit higher than the adjacent Castlemore development. There are long distance views of the sites from within the Metropolitan Castlereagh area, north of the dual carriageway. At present the development limit provides a strong boundary and clear definition to the setting of the city and protection of the elevated and rising slopes. Given the prominence and elevated position of the objection sites we consider that their inclusion would be detrimental to the setting of the city and would have an adverse impact on the quality, character and integrity of the AOHSV environmental designation. Development of either of these sites would not integrate well into the topography and landscape of Metropolitan Castlereagh. Objection site 3426 only abuts the settlement limit to its northern side and if included within the limit would form an unacceptable and illogical protrusion in the development limit. Objection 53 was also to its inclusion within the SLNCI. We have not been persuaded by the objector that the objection site is not worthy of designation as a SLNCI and consider that development on it would be detrimental to its overall integrity, severely comprising the nature conservation value of the site. We are satisfied that the objection lands should remain within the SLNCI. We recommend no change to the plan in respect of these objections.

**Lands at Church Road and Ballygowan Road**

**Objections 1515 & 3153, 16**

Objection site 1515 is 1.12 hectares in area. It is a triangular site and abuts Marlborough Heights within the development limit and Church Road sits to its eastern boundary. It rises considerably to the south and continues to rise beyond the objection site. A steep bank forms the northern boundary of the objection site with Marlborough Heights. On approach from the north along Church Road the site is very elevated and prominent and sits within the 90 m -120 m contour.

We consider that any development on this objection site would dominate adjacent development in Marlborough Heights and would have a high degree of visual impact, extending urban development into open countryside on elevated and prominent ground.

The original objection site 3153 of 22.3 hectares was reduced to a triangular portion bounded by Church Road to the west and the Greycastle Manor to the east. Objection...
site 16 encompasses this reduced site extending south and forms part of the original 3153 objection site. The objection sites rise significantly to the south and continue to rise beyond their southern boundary. On approach from the north along Church Road, development on the reduced objection site will appear elevated and prominent and would have a high degree of visual impact. When viewed from the Greycastle Manor to the east the objection sites also rise significantly and appear elevated and prominent. Any development on them would unacceptably dominate the existing development within Greycastle Manor.

All of objection sites 1515, 3153 and 16 are within the proposed AOHSV. At present the development limit provides a strong boundary and clear definition to the setting of the city and protection of the elevated and rising slopes.

Given the prominence and elevated position of each of the objection sites we consider that their inclusion would be detrimental to the setting of the city and would have an adverse impact on the quality, character and integrity of the AOHSV environmental designation. Development on any of the objection sites would not integrate well into the topography and landscape, extending urban development into open countryside on elevated and prominent ground. It would represent an unacceptable increase in the elevation and visibility of Metropolitan Castlereagh. We recommend no change to the plan in respect of these objections.

Objection 580

This objection site was reduced from that originally submitted from 2.38 hectares to 0.96 hectares. It is adjacent to the development limit and Whingrove Heights at its northern boundary. The site is located to the western side of the Ballygowan Road and opposite is zoned housing land MCH 02/17 which comprises the recently constructed Castlehill Farm housing development. Access is proposed from Church Road via the existing Greycastle Manor and Whingrove Heights. A 5.5 m wide access (with footpath) already exists through to the objection site between 2 houses.

It is evident on the ground that the site has the appearance of a left over space after the development of Whingrove Manor. The site is raised above the Ballygowan Road and is at a similar elevation to some of the development opposite within Castlehill Farm. The reduced objection site is visually enclosed and due to the mitigating effects of the topography and existing planting the site is exceptionally well screened from views from the Ballygowan Road. It is generally at the same level as the adjacent Whingrove Manor. We consider that the site will balance the boundary of the development limit along the Ballygowan Road achieving a compact urban form.

We consider that the site does not make a positive contribution to the proposed AOHSV and development would not undermine the integrity of the designation. Given its degraded quality, extremely limited views, enclosure and small size we recommend that it is included with the development limit.

Although the objector proposed only 4 houses and a large open space within the objection site we consider that given the urban context a higher density could be achieved and this is a matter for the development management process. A KSR is required to secure access via Greycastle Manor and Whingrove Heights.
Recommendation

We recommend that the site is included within the development limit and zoned for housing subject to the following key site requirement:

- Access to the site shall be through Greycastle Manor and Whingrove Heights.

Lands at Lower Braniel Road

Objections 3420/2963

Objection site 3420/2963 was reduced to exclude the elevated eastern fields from 11.48 hectares to approximately half its original size. The reduced objection site now comprises of 4 fields below the 90 m contour. It is located to the north-east of housing zoning MCH 02/17, south of Lower Braniel Road and east of Ballygowan Road.

It is bounded on 3 of its 4 sides by existing development. Generally development on the southern most field would be at the same height as built development on the zoned land to the south when viewed from the laneway between the 2 zonings. Fields 2 and 3 sit to the rear of Woodcroft Rise and Woodcroft Heights and gently rise with land continuing to rise beyond the objection site to the south east to Quarry Hill.

The site is not unduly prominent or visible from any important approaches into the city. From the Lower Braniel Road views into the site are screened by existing housing and vegetation and any development would be difficult to see. From the Ballygowan Road the site is set back behind the existing development and vegetation within zoning MCH 02/17 and cannot be seen.

The Department argues that when viewed from long distance views the site appears prominent and identified long range views from Braniel Estate, Shandon Park Golf Course, driving along the Knock dual carriageway and Stormont. We consider that from these long range views any development on the site would be seen with the wider panorama of development within the limit and there is already is some development within the 90 m contour line, with extensive tracts of land rising beyond.

We agree with the objectors that as the objection site would be defined on 3 sides, its inclusion would not result in significant outward expansion of Metropolitan Castlereagh. A line of trees will define the proposed settlement edge creating a strong and defensible limit. We consider that the site is integrated into the landscape.

It is for these reasons also that we consider that inclusion of the objection site within the development limit will not prejudice the functions of the proposed AOHSV and the setting of the City.

Recommendation

We recommend that the objection site is included within the development limit and zoned for housing.
Objection 3421

This 0.55 hectare site sits to the rear of 5 dwellings which front unto the Lower Braniel Road. It also lies within the AOHSV.

It is proposed only to develop the frontage portion and not the rising woodland behind. The reduced objection site is approximately one third its original size. We consider that development on the reduced site would not be visually prominent from the Lower Braniel Road as it is shielded from view by the frontage development.

The site abuts the development limit on its northern boundary only. The Lower Braniel Road to the south side is characterised by road frontage development.

Although development on the site would not be visually prominent, it would create tandem backland development, uncharacteristic of the existing built form along the southern side of Lower Braniel Road. We consider inclusion of this objection site would create an illogical adjustment to the limit and accordingly recommend no change to the Plan.

Objection 2785

This 5.45 hectare site sits to the south of dwellings which front onto Lower Braniel Road. The majority of the site is covered by the Lower Braniel Road SLNCI. It is also within the AOHSV. The land generally rises in a south easterly and southerly direction. Parts of the site are elevated and we consider that development would be prominent and have a high degree of visual impact extending the development limit to the south unto elevated ground. The development limit reads clearly to the rear of existing frontage development. We consider this to be important to the setting of the city and protection of the elevated, vegetated and rising slopes to the south. Given the prominence and elevated position of the objection site we consider that its inclusion would be detrimental to the setting of the city and would have an adverse impact on the quality, character and integrity of the AOHSV and heavily vegetated SLNCI, to which there was no objection. We recommend no change to the Plan.

Objection 421

This 0.25 hectare site is on elevated land to the west of 5 Middle Braniel Road and is enclosed with mixed hedgerows and trees. It is within the AOHSV. We do not consider it to be visually prominent due to adjacent properties and vegetation. However, it sits to the rear of frontage development along the Lower Braniel Road and would unacceptably extend backland development – notwithstanding its inclusion within the BUAP development limit. We consider that the mature vegetation on the objection site should remain within the proposed AOHSV. Accordingly, we recommend no change to the Plan.
Objections to Designation MCH 01: Metropolitan Development Limit (Dundonald)

Lands at Ballyhanwood Road, Dundonald

Objection 175

The objection site is to the west of Ballyhanwood Road. Part of the northern boundary of the objection site abuts the development limit along the edge of Fort Road. The objection site contains a scheduled archaeological monument which is locally significant and of historic interest.

It is situated on elevated land on a corner of Fort Road and overlooks the surrounding rural area. The Rath is heavily wooded with mature trees and provides a good canopy. Along with the trees, the Rath is visually prominent and of particular landscape and visual merit. We consider that development of the objection site would have an adverse impact on the views and setting of the Fort which is part of the justification of the LLPA justification.

The objector states that the Rath and its boundaries ought to be protected and the area designated is too extensive. We consider that the Fort, associated vegetation and landform have sufficient nature conservation and landscape interest to merit inclusion within the LLPA. The objection lands should remain within the LLPA as they contribute to the intrinsic environmental value and character of the area and help protect the visual amenity and local landscape setting. We consider the extent of the LLPA to be justifiable and agree with the Department that the LLPA is drawn tightly around the Rath and do not consider it to be too extensive.

The objection lands also lie within the extensive proposed AOHSV and are an important part of the setting of the City. We consider that development on the site will also impact detrimentally on this designation.

We agree with the Department that the objection lands lie beyond a good stop line to development clearly and logically defined by Fort Road and existing residential development. We consider that the site does not sit well into the urban form and if developed would form an illogical protrusion of built development into the open countryside on elevated and prominent ground. We therefore find it unsuitable for development and inclusion within the development limit.

The original objection sought an extension to the development limit to facilitate 1 dwelling for the objector’s son to the west of no 11 on the objection site. This is a matter for the development management process and is out with the scope of this report. We recommend no change to the plan.

Objections 3289, 3268

At the inquiry the objection site 3289 was reduced to 2 fields of approx 3.5 hectares with frontages unto the Ballyhanwood Road – this incorporates 3268.
The site is included within the AOHSV and a small part of the site is within Designation MCH 32/13.

We agree with the Department and the counter objectors that the site is elevated and visually prominent from the Ballyhanwood Road. Development on the objection site would contribute to urban sprawl extending development significantly out along the Ballyhanwood Road onto elevated and prominent land. The current limit is strongly defined with existing development along Fort Road. The objection site does not sit into the urban form. If included within the development limit it would form an illogical protrusion of built development into the open countryside on elevated and prominent ground. As objection lands 175 have been rejected the objection site would be physically separated from the development limit by some distance and it would not be logical to bring it within the development limit. Its inclusion would not constitute compact urban form. The site logically should remain part of the AOHSV.

It was argued that the site is in a sustainable location however we do not consider that it is as accessible to the EWAY as suggested by the objectors due to distances and gradients. In any case these arguments do not override the environmental objections to the site. Accordingly, we recommend no change to the Plan.

**Objection 2777**

This extensive objection site is also elevated and visually prominent from the Ballyhanwood Road. Development on the site would extend development significantly to the south west onto elevated and prominent land. If included it would form an irregular and illogical protrusion of built development into the open countryside. As with the previous objection site, as 175 has been rejected the objection site would be physically separated from the development limit. The site should remain within the AOHSV. Objection 2777 also objected to designation MCH 39 LLPA Fort/Ballyhanwood. However the objection lands do not include any part of this LLPA.

Objection 2777 also objected to the designation MCH 32/13 on the objection lands. This designation applies to lands to the north of the Ballyhanwood Road and a small portion to the south which is included within the objection site. However, the Department is now of the opinion that the boundaries of the proposed Moyard Geodiversity SLNCI should be amended to remove the lands to the south of the Ballyhanwood Road as these lands do not merit inclusion within the SLNCI. We endorse this amendment and recommend no other changes to the Plan.

**Recommendation**

We recommend that the portion of land to the south of the Ballyhanwood Road is removed from designation MCH 32/13.

**Objection 32**

This objection site is isolated and sits some distance to the south of the development limit. It is on prominent, elevated and open land to the north of Ballyhanwood Road. The objection site does not sit into the urban form. We consider that any development thereon would be visually intrusive and would extend development in a southerly
direction resulting in significant urban sprawl. If developed it would result in an extensive illogical protrusion in the development limit and would not contribute to a compact urban form.

**Lands between Comber Road and Gransha Road**

**Objection 2529 (including 3086, 422, 241, 671, 3122 and 3277)**

This is an extensive site of approx 82.6 hectares to the southern side of the Dundonald development limit lying between Gransha Road to the west and Comber Road to the east. The land generally rises to the south west and contains a number of single dwellings, farmhouses and farm buildings. The site extends significantly into the AOHSV and part of its south eastern boundary abuts the RLW designation CR 06. Development of the site would have a high degree of visual impact with local and distant views from all directions. We consider that this would be detrimental to the setting of the City, which the Plan seeks to protect through the designation of a AOHSV. We agree with the Department and counter objectors that inclusion of this extremely large site would lead to excessive growth onto prominent lands and would lead to excessive urban sprawl into AOHSV. We recommend no change to the plan.

**Objection 3086**

This 4.24 hectare objection site is bounded by development to the north, east and partly to the west, beyond the southern development limit of Dundonald. It lies to the west of New Line and east of Gransha Road and is within the AOHSV. The objection lands rise gently to the south west towards Gransha Road and there is higher land beyond the site. The site lies within the 50 m - 70 m contour line. The objector proposes development only on the lower part of the site below the 60 m contour line; this relates to approximately 2 hectares of land directly abutting and sitting into the limit. Objectors argued that this would retain the crest of the ridge to the south free from development.

We consider that if development is kept within the 60 m contour line it would logically round off development. We agree with the objector that by keeping development on the lower ground the character of the elevated Castlereagh Escarpment would be preserved. We consider that any development beyond the 60 m contour line would be prominent and elevated and would dominate housing in the adjacent Ferndene and Wanstead developments and would also be detrimental to the AOHSV. A KSR is required to ensure that there is no development above the 60 m contour line. In view of our conclusions in Part 1, we consider this to be an inappropriate location for a DOS.

**Recommendation**

We recommend that objection site 3086 is included within the development limit and zoned for housing subject to the following key site requirement:

- Built development shall not extend beyond the 60m contour line.
Objection 422

This 1.25 hectare elongated objection site sits to the east of Gransha Road and abuts the development limit partly on its northern side only. It also lies within the AOHSV. The site rises to the south and is generally within the 60 - 70 m contour.

We consider that development on the site would extend development to the south along Gransha Road onto rising elevated ground which would be detrimental to the integrity of the AOHSV. At present the development limit is clearly defined by existing roadside development on Gransha Road. Its inclusion would create an unacceptable protrusion into the countryside at Gransha Road creating unacceptable urban sprawl and would not contribute to a compact and logical development limit. We recommend no change to the plan.

Objection 3122 & 3277

Both of these extensive objection sites lie to the east of Gransha Road and contain agricultural fields separated by mature native hedgerows. These sites are critical to the setting of the City which justifies the designation of the AOHSV. They are both physically separated from the development limit by some distance and would represent isolated development in the countryside unrelated to the existing urban form. Accordingly, it would not be logical to bring either site within the limit as sought by the objector. In view of our conclusions in Part 1, we consider this to be an inappropriate location for a DOS. We recommend no change to the Plan.

Objection 671

This approximately 13 hectare site encompasses the road frontage portion of objection site 241 and extends further to the west to New Line. It abuts the development limit on its northern and eastern boundaries. It consists of agricultural land and a farm complex. The land generally rises from both the east and the west. The northern strip adjacent to Karrington Heights is extremely steep as well as the field to the east on the Comber Road. This site is visually prominent from the Comber Road and especially on approach from the south and beyond to the east. We consider that any development on the objection lands would have an extremely high degree of visual impact on this elevated and prominent site stretching along the Comber Road. There would be also a high degree of visual impact from New Line. Development on the objection lands would cause urban sprawl in a southerly direction on prominent land and would adversely affect the setting of the City and the AOHSV designation, which we consider is justified on the site.

We accept that the site is in a sustainable location however we do not consider these arguments to override the environmental objections to the site. The other factors raised by the objectors do not override our objections to the site. We recommend no change to the plan.

Objection 241

This approximately 7.5 hectare site lies to the west of the Comber Road and abuts the development limit to its north and east. The objection lands rise steeply from the
Comber Road to the west. They consist of agricultural land and the fields are bounded by mature hedgerows and occasional trees. The objection site lies within the AOHSV and its southern boundary abuts the RLW, CR 06. It is visually very prominent from the along the Comber Road and especially on approach from the south and from lands to the east.

We consider that any development on the objection lands and even the low density layouts proposed would have an extremely high degree of visual impact on this elevated and prominent site stretching along the Comber Road. We consider this to be an important site on approach to Dundonald from the south and consider that development on it would be detrimental to the integrity of the AOHSV designation and the setting of the City. Although, the development limit on the northern side of the road extends further to the south, this zoned land is relatively level with the Comber Road and has a very different topography that the steeply sloping objection lands.

We accept that the site is in a sustainable location however we do not consider these arguments to override the environmental objections to the site. We recommend no change to the plan.

Objection 1466

This objection site lies to both sides of the Comber Road. It is physically separated and isolated from the development limit by some distance and development on it would be unrelated to the existing built form. It would therefore not be logical to bring it within the development limit for housing or commercial development as sought by the objector. There was also an objection to the RLW CR 06. We agree with the Department that the objection site is an integral part of the Landscape Wedge and consider that its exclusion from it would prejudice the important functions of same.

The speed of traffic on the Comber Road causing a hazard to livestock is not a planning matter. We recommend no change to the plan.

Lands between Kempstones Road and Comber Road

Objection 642

This objection is to inclusion within the RLW and also seeks inclusion within the development limit for housing. This 13.10 hectare site extends significantly to the east along Kempstones Road. It is gently undulating agricultural land. The site contains a private dwelling and farm complex to the south and to the northern part fields generally rise to the east/north east. It abuts the development limit on its northern western side only. Development on this relatively large objection site when viewed from the Kempstones Road would be prominent on this rising ground and would illogically extend development. The eastern development limit is currently clearly defined by housing zoning MCH 03/12 and we consider that development on the objection site would result in unacceptable urban sprawl and not provide a compact urban form.
We consider that development on the objection site would encroach significantly into the wedge when viewed from the Kempstones Road and would prejudice its important functions, one of which aims to preserve the setting of Dundonald. We recommend no change to the plan.

**Lands at Greengraves Road**

**Objection 3698**

This extensive 96 hectare site is to the east of the Dundonald settlement limit. The Department’s June 2007 Paper identified this objection site suitable for development to accommodate 2,482 units. However at the Inquiry a reduced objection site came forward of approx 35 hectares, reducing the yield to 750 units. The objectors stated that the reduction was to reflect the scale of the adjacent housing zoning MCH 03/12 and to integrate into the urban form. The reduced objection site abuts zoning MCH 03/12 within the development limit and extends north and south of Greengraves Road. The proposals included 3 areas of open space – 2 at the southern boundary and 1 at the centre which are the tops of drumlins, with the drumlin landscape restricting views of development on the lower parts of the site. Development is proposed within the ‘bowl’ areas between the drumlins.

We conclude elsewhere in this report that RLW CR 05 and CR 06 should not be extended and our consideration of this objection is in that context. Irrespective of views expressed in the previous BUAP report, we must make our assessment on the basis of policy and other circumstances pertaining today.

The objection site sits between 2 RLWs; CR 05 to the north and CR 06 to the south. The functions of the RLWs are to distinguish and maintain the identity of Dundonald and define and protect the setting of both Dundonald and Newtownards and Comber so that their respective identities are preserved and enhanced and to maintain the rural character of the countryside.

The objection site is set well back from the Kempstones Road. The Department stated that the 2 RLWs are designated only where they can be seen from the main approaches to the City. The Department considers that the portion of the RLW Newtownards CR 05 that is within the northern part of the reduced objection site is not visible from the Newtownards Road or the Kempstones Road and we agree with this analysis. This part of the objection site can be removed from the RLW and its function of protecting the setting of Dundonald would not be prejudiced. We consider the reduced RLW still to be a significant size and disagree with the counter objectors that it is less valuable. Development on the reduced objection site will not lead to visual coalescence with Newtownards given its distance and intervening topography.

The objection site is also significantly set back from the Comber Road and to the rear of large playing fields of the Billy Neil MBE Soccer Centre of Excellence. Development proposed on the objection site does not interfere with the Comber Road RLW, Designation CR 06 and we consider that its functions are not prejudiced. We are satisfied that development on the objection site would not cause any sense of visual or physical coalescence with Comber or adversely affect the setting of Dundonald. We
consider that long range views would be available from parts of the Comber Road to the site across the RLW especially when travelling on approach to Dundonald and we consider that if development was restricted to the lower parts of the site, avoiding the drumlin tops, development would appear integrated into the landscape.

In terms of urban form the counter objectors argued that the site is peninsular in character with a short common boundary and that it does not create rounding off. Whilst, we agree that this is the case when viewed 2 dimensionally, the site has to be considered 3 dimensionally taking account of views from the Comber Road and Newtownards Road viewpoints and its impact on the setting of Dundonald has to be considered. The proposed cemetery proposal (which we recommend to be brought within the development limit elsewhere in the report) would infill a wedge to the south west of the objection site and this would read as a designed landscape rather than a rural landscape as argued by the counter objectors.

Counter objectors raised concerns that schools and shopping facilities are not viable on this site and therefore the site is not sustainable. We agree with the objectors, however, that services would be available in Zoning MCH 03/12 adjacent to the site.

Counter objectors also raised views from Scrabo, which we consider to be long range and development on the site would be seen within the wider panorama of development within Dundonald. From this viewpoint we do not consider that the proposal would be detrimental to the setting of Dundonald.

As we have agreed that the RLW can be reduced, the site will not be an island site and the counter objectors’ arguments that the proposal would have to be assessed as a new settlement does not apply.

We consider that the site presents benefits in terms of location as it is close to the EWAY, Employment zoning MCH 08 and transport routes to Belfast, Newtownards and Comber. The need for housing is to be balanced with environmental factors and we consider the objection site to be acceptable for development given the set back from both the Comber and Newtownards Roads and if kept to the lower parts of the site as proposed to achieve integration. This can be secured with KSRs. Taking all of the above factors into account therefore we consider that the objection site is suitable for housing. The site is not needed to meet the HGI, however, and in view of our conclusions in Part 1 of our report, we recommend that it is held in the short term land reserve and only released if required. We indicate in relation to our conclusions on the objection to zoning MCH 05/09 that the Department should review the capacity of zoning MCH 03/12. The timing and extent of release of this objection site will be dependent on the outcome of those deliberations.

Issues raised in respect of landscaping and roads will be subject to regional policy through the development management process.

**Recommendation**

We recommend that the objection site as shown on Plan 3 is suitable for housing and held in the short term land reserve to meet needs beyond the end of the Plan period, if
required. Development of the site should be subject to the following key site requirements:

- Development of the site shall only be permitted in accordance with an overall comprehensive Masterplan for the site, to be agreed with the Department. This shall outline the design concept, objectives and priorities for the overall site and shall specify links to the EWAY.

- There areas indicated on Plan 3 shall be retained as open space and shall remain free of built development.

**Lands at Dunlady Road/Ballyregan Road**

**Objections 3696, 3251 and 582**

Objection 3696 lies to the north of Dundonald’s northern development limit and seeks the allocation of lands between Dunlady Road and Ballyregan Road for housing. The objection lands are divided into 2 portions; site A - to the west of Dunlady Road which is 5.43 hectares and site B to the east of Ballyregan Road which is 9.11 hectares. Dunlady Road rises steeply and the objection lands are elevated and prominent rising generally in a north/north westerly direction. The northern boundary of site A and B are arbitrary lines undefined on the ground. LLPA MCH 33 lies in between the 2 portions of land. Objection site 582 is 1.55 hectares and also sits to the north of the Dundonald development limit abutting it directly and to the east of Dunlady Road. It generally sits within the 65-85 m contour line and its northern boundary is defined with a mixed hedgerow which is the boundary of a single dwelling. Land to the rear and north of the sites rises very steeply and is visually prominent.

Objection 3251 relates to elevated land to the north of 3696 and the objector confirmed at the inquiry that it is not being pursued for housing development, although part of the site may be required for access.

The objection sites are all within the extensive AOHSV. At present development encroaches into the sensitive landscape surrounding Dunlady Road. The limit, however, provides a strong boundary and clear definition to the setting of the City. The protection of the elevated and rising slopes is essential to protect the setting of this part of the Metropolitan Area. Given their prominence and elevated position we consider that inclusion of the objection sites within the development limit would be detrimental to the setting of the City and would have an adverse impact on the quality, character and setting of the AOHSV. Given our conclusions in respect of the removal of housing zoning MCH 05/09 from the development limit, there is no existing development within the settlement at this elevation.

Notwithstanding the Department’s concession for development up to the 73m contour line within objection site 3696 to an undefined boundary, we consider that development on each of these sites would encroach onto rising lands and would create a visual intrusion onto elevated open countryside which would be visible over some distances within the urban area. Development would appear prominent and
would not integrate well into the topography and landscape and represent an unacceptable increase in the elevation and visibility of Metropolitan Castlereagh.

Although the proposals for site 582 included for only 5 dwellings and landscaping up to the 73m contour line we consider that when viewed from within the adjacent urban area to the south the objection site is significantly elevated and development thereon would unacceptably dominate the existing development. Accordingly, in respect of these objection sites we recommend no change to the Plan.

Objections to Housing Zonings

**Zoning MCH 03: Committed Housing Sites**

**Objection 1174/2**

This was a general objection to policy MCH 03 in its entirety to all committed housing zonings. However due to the general non specific nature of the objection we are unable to make any recommendations in respect of it.

**Zoning MCH 03/09: Hanwood House, 125 Old Dundonald Road**

**Objection 468/16**

DGBA objection stated that there was no attempt to preserve Hanwood House, contrary to PPS 6 Policy BH 15. The plan states that the site has outline planning approval for 18 dwellings and we note that the Planning History on the site indicates that the latest approval is for 45 apartments (Y/2006/0019/F). It is the Department’s responsibility to ensure that the appropriate regional policies are taken into account in the determination of planning applications and, in view of the planning history on the site, we recommend no change to the plan.

**Zoning MCH 03/10: Land at and to the north of 360 Saintfield Road**

**Zoning MCH 03/11: Land at Cairnshill, Saintfield Road, Knockbracken Road.**

**Zoning MCH 03/12: Lands at Millmount, Quarry Corner and Carrowreagh Road**

Objections 212, 352/1, 468/15, 856, 863, 886/8, 2000, 2149, 3932.

The objectors for these housing zonings sought amendments or deletion of the KSRs. The Department stated that the objection sites have Planning Permission subject to conditions and that in light of these permissions the conditions are considered sufficient to allow a satisfactory form of development. As a result, the KSRs are no longer necessary.

In response to the EVGBA objection to MCH 03/12, as the site benefits from planning permissions it would not be logical to de-zone it.

We recommend that the KSRs are deleted.
**Recommendation**

We recommend that the KSRs for Housing Zonings MCH 03/10, MCH 03/11 & MCH 03/12 are deleted.

**Zoning MCH 03/12; Lands at Millmount, Quarry Corner and Carrowreagh Road**

**Objection 3909/1, 3932/1**

CBC sought the identification of additional lands to compensate for the EWAY land take shown in Plan Amendment no 1 (map 18) which reduces the zoning from 91.60 hectares to 86.45 hectares. We assume that the Department has allowed for this land take in their original assessment of the output of the zoning. In any case we refer to our conclusions reached for housing zoning MCH 05/09: Land at Stoney Road, Dundonald, where we concluded that the Department’s estimated output on the Millmount zoning was an under estimate of its actual potential.

Objection 3932/1 also objected to this reduction in the land available for housing and sought a higher output. We have already recommended the deletion of the KSR’s in view of the evidence that planning permission has been granted. This does not preclude a higher figure coming forward than the 1080 indicated in the Plan Amendment which we have already indicated is too low an output for sustainability reasons. We disagree that there is a need to identify any more land. Accordingly, we recommend no change to the Plan as a result of these objections.

**Zoning MCH 04/03: Land at 158 Newtownbreda Road**

**Objection 2760/42**

The objection to the housing zoning was that it had the potential to prejudice bringing forward development of the consented Tesco foodstore adjacent to the zoning. As this foodstore has already been built the objection is no longer relevant. We recommend no change to the plan.

**Zoning MCH 04/04: Land at Beechill Road**

**Objection 321**

The objector claims that MCH 04/04 Housing zoning appears to intrude into their client’s car park at Beechill House office development. We cannot discern any overlap with the objection lands identified and Housing Zoning MCH 04/04 and further comments are unnecessary.

The objection sought an office node on the site because there were existing offices that were formerly used as Government offices and this was seen as analogous to Stormont. This site does not compare in scale or function to Stormont, which has office development which supports public administration. We have concluded in Part 1 of our
report that office development must be strictly controlled and that the specified locations in the Plan were sufficient to address the office needs of the Plan area. We therefore conclude that there is no justification for an office node at this location and there should be no change to the Plan as a result of this objection.

**Zoning MCH 05/04: Lands at Craigleith Drive and Drumadoon Drive, Ballybeen**

**Objections 699/5, 1213/1, 3825/19**

The objector sought the rezoning to a mixed health, retail and community use as over £2 million in funding has been secured in principle for retail units, day and multi purpose health centre for the South and East Belfast Trust.

We note that the site is now occupied by the ‘Enler Complex’ shops and retail units and is operational and the rezoning as requested is unnecessary. The housing zoning is no longer appropriate, however, and we recommend that it is deleted.

**Recommendation**

We recommend that Housing Zoning MCH 05/04 is deleted from the Plan.

**Zoning MCH 05/06: Lands at Ladas Drive**

**Objection 2666/4**

The objector sought the modification of the zoning to ‘whiteland’ as the zoning is too prescriptive in a locality characterised by a range of differing uses. The Department conceded at the Inquiry that the housing zoning can be removed and remain unzoned and we concur with this recommendation.

**Recommendation**

We recommend that Housing Zoning MCH 05/06 is deleted.

**Zoning MCH 05/07 Forster Green Hospital, Upper Knockbreda Road**

**Objections 906, 1268, 409**

Original objections from the Eastern Health and Social Services Board and Belfast Health and Social Care Trust stated that this land was required for continuing health use and sought its re-designation for health use. At the Inquiry the objectors stated their support for housing zoning MCH 05/07 and sought a modification to facilitate healthcare expansion leading to a mix of housing and health uses within the zoning to facilitate flexibility. It is on this basis that we consider the objection.

Zoning MCH 05/07 is currently in healthcare use. A large inpatient adolescent and child mental health complex with residential accommodation and associated car
parking has recently been constructed within the western portion of the site. The Forster Green building sits within the south western portion of the site and large car parking areas lie to the north west serving the Government buildings and the new health centre within zoning MCH 46/01.

At the Inquiry, the Department stated that it appreciated the constraint of a housing zoning and had no objections to zoning MCH 05/07 for a mix of health and residential use, subject to KSRs.

In view of the Trust's objections, it is difficult to understand why this intensively used healthcare site was zoned for redevelopment in the plan. We accept, however, that the Trust is best placed to identify its needs within the Healthcare Estate. In view of the current use of the land and the Trust's stated position at the Inquiry however, we endorse a mixed housing/healthcare use of the site. It will be for the Department to identify the extent of healthcare use to be retained in consultation with the Trust. This mixed use addresses some of the concerns of the Glencregagh Residents Group. Other concerns in relation to density and building heights will be addressed through the requirement of an overall comprehensive Masterplan and traffic concerns will be addressed with the requirement for a Transport Assessment which is a requirement of regional policy. We conclude that it is appropriate to recommend a mixed housing and health use subject to KSRs.

**Recommendation**

We recommend that the site is zoned for mixed use for housing and health purposes subject to the following KSRs:

- Development of the site shall only be permitted in accordance with an overall comprehensive Masterplan/development framework for the site, to be agreed with the Department. This shall outline the design concept, objectives and priorities for the overall site and shall indicate an appropriate mix of specified uses within the site. It shall also set out a block structure defined by a hierarchy of routes and spaces.

- Where residential and health uses are located in close proximity, development proposals shall make provision for an appropriate open space/landscape buffer to ensure no adverse impact on the amenity of residential occupiers,

- Access shall be from Glencregagh Road.

**Zoning MCH 05/08: Belvoir Park Hospital, Hospital Road, Purdysburn**

**Objection 3825/31**

NIHE objected to MCH 05/08 but referred to Forster Green. MCH 05/08 is actually housing at Belvoir Park Hospital, Hospital Road, Purdysburn. The Department categorized the objection under MCH 05/08: objection to housing zoning Belvoir Park Hospital. NIHE expressed an interest in having this zoned for social housing. We
consider there to be confusion as it is not clear whether the objector is referring to MCH 05/08 or MCH 05/07. We do not have any information on either site to evaluate either objection. We are therefore unable to make any recommendations based on this objection.

**Zoning MCH 05/09: Land at Stoney Road, Dundonald**

**Objections 158/1, 176, 270, 274, 278, 281/2, 332/2, 383/8, 459/1, 468/8, 601, 886/9, 981/1, 906/11, 1009/1, 1068/1, 1084, 1088, 1115/1, 1176/1, 1243/1, 1258/1, 1389/1, 1443/1, 2024/4, 3215/1, 3230/1**

DGBA and EVGBA sought that the housing zoning should be removed and the land incorporated into the landscape wedge. Other objectors sought its return to the countryside. They argued that the site was uncommitted and that attempts to obtain approval have been rejected twice by the Department and the Commission.

The Department confirmed that the RDS directed housing to existing zonings and whitelands. Within the BUAP this land was whiteland. The Department confirmed that an assessment was done of all the whitelands which showed this site to be acceptable as it contained no environmental objections.

The objectors consider that the site is visually obtrusive. It is located in an elevated location above Dundonald. In terms of short range views any development on the site will be obvious from the road frontages of Stoney Road to the south and the Ballyregan Road to the east and from the Ulster Hospital car park to the south. We agree that from these short range views development on this steadily rising ground will be visually intrusive. Medium range views are restricted due to screening of built development and vegetation and road alignments and it is difficult to obtain a clear view of the site. However, we consider that when viewed from long range viewpoints from the southern side of Dundonald this zoning will extend built development onto rising and elevated land. This would appear as a prominent swathe of development and given its high degree of visibility from long range viewpoints would have a detrimental effect on the setting of the City and would be unacceptable. Existing development to the east is already visually intrusive and compromises the setting of this part of the Metropolitan Area. This site would represent a further significant intrusion into the countryside in this sensitive location and would extend development beyond the line of development already established to the east onto a higher elevation. Irrespective of the previous inclusion of the lands as ‘whitelands’ in BUAP and the RDS directions towards whitelands, we take the view that the emphasis on protection of the setting of the City must take priority. Accordingly, we recommend that the Housing zoning is deleted and the land excluded from the development limit.

We consider that the objection lands would not readily form part of the Landscape Wedge which is a linear feature separating the urban communities of Belfast and Dundonald. The objection site sits off to the east from the landscape wedge and its inclusion within the Landscape Wedge would be illogical. We do not consider that the inclusion of a former whiteland site at Greenisland into the Landscape Wedge creates a precedent for MCH 05/09, as each site has to be assessed on its own visual merits. Although not raised by objectors, it would be logical for these elevated lands to be
brought within the AOHSV, in recognition of their contribution to the setting of the City. We remit this to the Department for consideration.

It is unnecessary for us to address other concerns raised by the objectors which would only be relevant if the zoning was found acceptable.

EHSSB sought the southern edge of the housing zoning to be placed 300m to the north to allow for 5 hectares of land to be designated on the northern side of Stoney Road for Health use as the hospital has begun an expansion programme which will exhaust the supply of land within its ownership. Provision has already been made in the Plan for Health facilities and the Board have not provided any reasoning for the need for additional land. Although this part of the site is less sensitive in visual terms, there was no persuasive evidence of any additional land required in addition to that allocated in the Plan and we conclude that zoning for Health use is not justified.

The deletion of this zoning would result in an estimated loss of 175 dwellings which would have to be provided elsewhere in order to meet the HGI. We note the Department’s estimated figure for Millmount is 1080 dwellings and consider this to be a significant underestimate of the capacity of the site, particularly in view of its proximity to the EWAY. In view of the Department’s agreement to the deletion of the KSRs on MCH 03/12 there is no longer a maximum figure specified. We urge the Department to reassess the capacity of this important site to ensure that its potential is maximised in view of its contribution to the sustainable transport objectives of the Plan.

**Recommendation**

We recommend that:

- Housing Zoning 05/09 is deleted from the Plan and the land is excluded from the development limit.
- The Department gives consideration to the inclusion of the lands within the AOHSV.

**Objections seeking additional social housing zonings**

**NIHE Objections at Ballybeen and Belvoir**

**Objection 3825**

NIHE stated that Ballybeen Square within the Ballybeen Estate is currently under regeneration and this has the potential to develop approx 50 units of housing which would meet the projected housing needs. NIHE wants to retain the right to restructure without it being designated as open space. Morven Park, Ballybeen is a brownfield site within the estate and the NIHE sought its zoning for housing. Coleshill Gardens, Belvoir is owned by the NIHE who sought its zoning 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. In this context, we can do little but consider the general location of the sites and recommend that the Department pursue the feasibility of social housingzonings with the NIHE.

**Recommendation**

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

**Objections to the non identification of key site requirements for social housing**

**Objection 699**

The objection raised the failure to include a KSR for social housing on zoning MCH 03/12 - Lands at Millmount, Quarry Corner and Carrowreagh Road;

We consider that this site should make a contribution to social housing provision and that the Department should determine the level of social housing appropriate. We note that it has outline approval and some construction has commenced. In view of its location close to the EWAY and the opportunity to integrate land use and transport, we consider that the site should make generous provision for social housing in the event that planning permission has not been granted for the entire site.

**Recommendation**

We recommend that this site includes a social housing element the extent of which is to be determined by the Department.

**Objections seeking Housing Zonings**

**Objection 699**

CBC seek the following sites to be zoned for housing: Lands at East Link Road, Geary Road and Cregagh Park.

We address lands at East Link Road and Geary Road under objections to LLPAs 42 and 44 and conclude that the LLPAs are justified and they should not be zoned for housing.

The Cregagh Park site is a small corner plot at the corner of Cregagh Park and Cregagh Park East. The site is grassed and planted out and is well maintained and used as a children’s casual play area. We consider it to be a valuable open area in the context of the immediate built up area both visually and spatially. We consider that the site provides a valuable contribution and should be retained. The role of the planning system is to protect community facilities unless demonstrably unnecessary. No evidence has been submitted to indicate that this is the case and therefore we consider
that the objection site should remain as open space. Accordingly, we recommend no change to the Plan.

**Objection 3395**

The objector seeks land at 18 Old Dundonald Road to be allocated for housing and its exclusion from the Dundonald Old Railway Line SLNCI – MCH 32/08. This site appears to be largely developed and therefore does not warrant designation as a housing zoning. In view of this, it would therefore seem logical to exclude this developed site from the SLNCI.

**Recommendation**

We recommend that objection site 3395 is removed from SLNCI – MCH 32/08 - Dundonald Old Railway Line
EMPLOYMENT

Zoning MCH 07: Land at Saintfield Road, Purdysburn including Knockbracken Healthcare Park

Objections 906/9 and 1268/1. 2105/7, 2988/3, 3621/1, 3824/17 and 3825/13, 3909/2

In their submission to the Inquiry the SEBT and EHSSB sought residential development within the north western part of the zoning. We have examined the original objections carefully and can find no reference to residential development. Irrespective of the public benefits which could accrue, this clearly goes beyond the scope of the original objection and cannot be considered.

We prefer the Department’s suggested headnote for the zoning to be amended to include a reference to health. We endorse the wording and the reference to the MEL to be retained, as referred to specifically in the RDS.

The Department confirmed that the area of the site should be reduced by 2.05 hectares to reflect the primary school along the northern boundary which has been constructed and consequently should be removed from the MEL. We endorse this amendment.

There was agreement that text submitted by the objector should be included referring to the requirement of an overall Comprehensive Masterplan/Development Framework for the site to be agreed with the Department clearly showing that all KSRs can be accommodated within the overall design. We agree that a Comprehensive Masterplan is required in view of the size of the site and range of proposed uses. There is no need for a requirement for a TA as this is covered by regional policy.

Zoning: The Department agreed at the Inquiry that it was unnecessary to split MCH 07 into zones. As a result any KSRs that refer to zones would be deleted.

There was agreement that text should make reference to land zoned for a mix of uses including health and employment. We suggest that Map No 2y would no longer be necessary to illustrate development zones no longer proposed however it could be retained to demonstrate the ‘Area to be kept free of development’.

Key Site Requirements: We agree with additions made by the Department and objector that development should comprise an appropriate mix of uses including health and employment to be agreed with the Department as we consider that this requirement recognises RDS directions to provide a MEL at Purdysburn. We consider it appropriate to include suggestions by both parties that where employment uses are located, buffers of landscaping/open space between them and health or residential uses is required to ensure no adverse impact on amenity.

Access: We endorse the wording in Plan Amendment No 1 in relation to the Primary Access from the Saintfield Road.

Heights: There was agreement that reference to heights should be deleted. We endorse that agreement
The parties agreed that references to the individual zoning should be removed. We agree with the Department that the visually prominent Grahamholm Building to the north east is an important focal point and landmark contained in its own spatial setting and development proposals should respect it and this should remain as a KSR. We also consider that reference to the 'area to be kept free from development' (to be reduced as submitted by the Department due to a supported housing planning approval) should remain to retain this visually attractive landscape feature - notwithstanding the presence of the gate lodge and the road widening requirements as argued by the objector. Although the objector argues that neither the building nor the landscape have protection, we consider that they are important elements within the site and should be taken into consideration in the overall development proposals and factored into the Comprehensive Masterplan. KSRs would ensure this.

Uses: The parties agreed the list of acceptable uses which we endorse.

Text within Zonings: Although the zones are to be removed, it was agreed that some of the text remained relevant. We agree with the Department that with the exception of building heights, text relating to the current zone B should apply throughout the site and should therefore remain. There was agreement that all text in relation to zone C can be removed. This would ensure that development proposals within the western and northern parts of the site would take account of the landscape character, topography and landmark buildings and development proposals would come forward set within a generous parkland setting.

We agree that the following KSRs can be deleted - the requirement for upgrade works to watercourse and an archaeological programme. PPS 6 addresses archaeological evaluation and PPS 15 covers flood risk. Also, the requirement for variety in elevation treatments, heights and design matters will be addressed through the Comprehensive Development Plan and development management. The presence of the listed buildings can be referred to in the amplification and this could refer to the statutory duties in respect of these features covered by PPS 6.

Environmental Designations: The extent of the Purdysburn Hospital SLNCI was reduced by the Department on nature conservation grounds and set out on revised map 2q. The reasons for the remaining designation include its grasslands, woodland and its contribution to the wildlife corridors. The objector sought the removal of the SLNCI however no reasons were forwarded as to why it did not merit designation apart from the presence of the mortuary. We agree with the Department that the lands should remain within the Purdysburn SLNCI as they contribute to the intrinsic environmental value of the area. The SLNCI does not preclude development and the mortuary could be redeveloped as required. It would be illogical to exclude the mortuary as it would be surrounded on all sides by the SLNCI.

Objection 2105 and 2988/3 also objected to designation MCH 45 which proposes a community greenway through the site. We agree with the Department that MCH 45/03 Castlereagh Escarpment/LVRP is identified to assist in developing a network approach to the provision of open space by providing linkages between areas of existing open space and therefore we consider that it should be retained.
Landscaping: The Department’s suggested landscaping key site requirements related to the submission of a comprehensive landscaping scheme with planning applications and long term landscape management proposals. We agree that these KSRs read like planning conditions and are not necessary to be specified in this way. These matters can be addressed as part of the Comprehensive Masterplan which requires a comprehensive landscaping scheme. The Masterplan should include a KSR for a 5-10m buffer to Hydebank. The reference that an Article 40 may be required to ensure delivery of management proposals should be moved to the amplification section.

Amplification section: It was agreed that references to the individual zones could be removed and this would also apply to this section. We agree with the Department that it is appropriate to include references to existing buildings and their relationship within the site context such as the Grahamholm building located in the northern elevated portion of the site and how it acts as an important landmark/focal point and the 2 churches on elevated land within the south western portion of the site. We endorse the Department’s approach in setting out its aspirational objectives for the Purdysburn MEL developing as a Business Park within a generous landscape as it provides a vision for the development of the Comprehensive Masterplan.

We agree with the parties that, the remainder of the amplification text could be removed as development management and regional policy would address these matters.

In response to Objection 3824/17, we have concluded in Part 1 of our report that acceptable uses on employment sites will include Use Classes B1(b) and (c) and therefore this objection is addressed.

CBC (699/18) seeks the deletion of part of the Transport Assessment KSR which states that ‘developer contributions may be sought for the Super Route Rapid Transit proposal’. The Council considers this as an unnecessary burden on developers as it is to serve commuter traffic travelling into Belfast, and any use in the opposite direction to the MEL will be to the benefit of the Super Route. The Department accepted the rewording of the KSRs and we note that this was excluded from the list of KSRs that was agreed.

Recommendations

We recommend that:

• The headnote to policy is amended;
• The Primary School along the northern boundary is removed from the zoning;
• The sub division of the site into zones A, B and C is removed from the policy headnote and deleted from Map 2y:
• Map 2y should be amended as shown on Plan 4 to show the area to be kept free of built development reflecting the supported housing planning approval;
The extent of the SLNCI designation MCH 32/15 shall be reduced as indicated on Plan 5;

The amended wording for the policy should read as follows;

Zoning MCH 07 - Mixed Use Site including Health/Employment

Land at Saintfield Road, Purdysburn including Knockbracken Health Care Park - Major Employment Location

Approximately 85.90 hectares of land are zoned for a mix of uses including Health and Employment as identified on Map No 2a - Metropolitan Castlereagh and Map No 2y Purdysburn Major Employment Location.

Key Site Requirements:

- Development shall only include the following uses:

  Business Use as currently specified in Part B of the Planning (Use Classes) Order (Northern Ireland) 2004, as amended.

  Residential Uses as currently specified in Part C Class C2 and C3 of the Planning (Use Classes) Order (Northern Ireland) 2004 as amended.

  Provision of any medical or health services as currently specified in Part D of the Planning (Use Classes) Order (Northern Ireland) 2004 as amended.

  The total amount of floorspace for use within Class B1(a) shall not exceed 3,000 sq. m.

  Development of the site shall only be permitted in accordance with an overall Comprehensive Masterplan/Development framework for the site, to be agreed with the Department. This shall outline the design concept, objectives and priorities for the site and shall indicate an appropriate mix of specific uses. It shall also set out a block structure defined by a hierarchy of routes and spaces.

- Primary Access shall be from the Saintfield Road.

- Where employment uses are located in close proximity to health uses development proposals shall make provision for an appropriate open space/landscape buffer to ensure no adverse impact on the amenity of health or residential occupiers.

- A comprehensive landscaping scheme for the proposed development shall be submitted as part of the Development Framework/Comprehensive Masterplan. This shall include boundary definition.
and provision of landscaping within the site, including a planted buffer 5 - 10m along the western boundary of the site.

- The Grahamholm Building shall be retained and development proposals shall respect it as a focal point contained in its own spatial setting. An area identified on Map 2y shall be kept free from built development.

- Development proposals shall take account of the landscape character and site topography and shall be set within a generous parkland setting interspersed with high quality landscaping. Development proposals shall take account of the existing landmark buildings.

Additional Text

The Department envisages Purdysburn MEL developing as a Business Park within a generous landscape setting incorporating Information Communication Technology (ICT) uses, medical/Biotechnology uses, Research and Development and facilitating inward investment and local businesses.

The Grahamholm Building, located in the northern elevated portion of the site acts as an important landmark. Development proposals shall take account of this existing landmark building and shall retain a focal point at this location. The Department would encourage reuse of this building.

The south western portion of the site forms part of an Historic Park, Garden and Demesne and includes two Churches on elevated land contained within their own landscape setting which are of significant importance to the local landscape character. These should be respected in any development proposals.

Objections to MCH 08: Employment/Industry Land South-East of Millmount Road, Comber Road

Objections 281/1, 322/1, 352/2, 383/7, 468/9, 521/2, 886/10, 1133/3, 1988/7, 1990/3, 2529/8, 3158/4

Plan Amendment no 1 reduces MCH 08 from 9.24 hectares to 8.4 hectares to take in road amendments to the transport corridor. The objection site is between the Comber Road and a disused railway line at the southern end of the Millmount housing zoning on the south - eastern edge of Dundonald.

Objectors seek its re-zoning to housing use and argue that it is better suited for residential use due to its accessibility to the EWAY, the fact that it is already an established location for housing growth and policy support for allocating land within the limit as it is considered suitable for development. Others wish the site to remain outside the development limit in agricultural use.

MCH 08 is the only new employment site allocated in Dundonald and along with MCH 09, which is an existing employment site at Upper Newtownards Road/
Carrowreagh Road, provides choice and variety for businesses in this part of Castlereagh. There are only 2 new employment zonings in the overall Castlereagh Metropolitan Area - MCH 08 Comber Road and MCH 07 Saintfield Road. We note that MCH 08 allows for light industrial uses which are not included for in MCH 07. The site therefore provides a choice of locations in different parts of the Metropolitan District and allows for employment uses that are not permitted in MCH 07.

A park and ride hub to serve the EWAY rapid transit scheme is immediately to the north of the site beyond the Millmount Road. In order to facilitate economic growth in line with RDS objectives the location of this employment site on the Newtownards Metropolitan Transport corridor is appropriate and the site will be accessible by public transport. We agree with the Department that zoning MCH 08 will capitalise on the benefits of the EWAY proposal. We consider therefore that MCH08 is in a sustainable location in close proximity to the EWAY and the park and ride.

The zoning, along with adjacent housing zonings facilitates a high level of integration between land uses and existing and proposed transportation infrastructure.

The RDS seeks to support Castlereagh as an important employment location. The rezoning of this zoning to housing would significantly reduce the employment allocation in Metropolitan Castlereagh and would limit new employment opportunities only to the Saintfield Road. Whilst we acknowledge the need for more housing lands, there is also a need for employment land. We consider that that the employment zoning in the plan is justified in order to support the increase in housing and population and achieve a balanced spatial pattern of land uses which is in line with the RDS objectives for the role of Castlereagh. Zoning MCH 08 will support and sustain the existing community and support the proposed housing growth whilst offering a greater choice and variety in terms of site selection for potential investors and indigenous businesses throughout the plan period.

Although objectors argued that there are about 15 hectares of undeveloped employment land at Carrowreagh Road, we note that the area is actively being developed for industry and INI have no further land available at this location and are opposed to the loss of employment/industry zonings. For all of the above reasons we are not persuaded that Dundonald is oversupplied with employment land.

DGBA and EVGBA sought the land to be de zoned and that it should remain within the countryside or be added to MCH 42 or designated as a community woodland site. The need for employment land outweighs these alternatives. The Department confirmed that the objection site would not contribute to MCH 42 - LLPA as the land was filled and has no amenity value. Suggestions that MCH 08 should become the Millmount Park and Ride site and the designated Park and Ride site could then be incorporated into the LLPA are unjustified as we have concluded that zoning MCH 08 is to be retained for employment use. We have concluded that MCH 08 should be retained and therefore other arguments that the site should be put to another use or excluded from the settlement limit area are rejected.

Other issues raised were too general for us to consider further. The restrictions on uses on the site are set out in the KSRs. Accordingly, we recommend no change to the plan.
Existing Employment Sites

**MCH 09 : Land at Upper Newtownards Road/Carrowreagh Road**

**Objections 525, 3824/16, 1742, 3442**

Objectors’ state that within zoning MCH 09, planning permission has already been implemented for a change of use of the existing Government Training Centre to an IT based Customer Contact Centre/Call Centre including software development, training facilities and administration support and seek inclusion of this use within MCH 09. In view of our conclusions in part 1 that Class B1: Business Use (b) and (c) uses will be acceptable on all existing employment sites, the objectors concerns are therefore addressed. We therefore recommend inclusion of Class B1: Business Use (b) and (c) to reflect the position in Part 1.

There were objections to matters which affect development on zoning MCH 09 including the KSRs, Designation MCH 37 LLPA Dunlady Glen and MCH 32/05 Craigantlet Woods SLNCI. However the objectors did not indicate how the KSRs should be amended and how these lands do not merit inclusion within an LLPA or SLNCI. We have no evidence disputing the Department’s stated reasons for these two designations and therefore recommend no change in respect of these.

Objectors sought Designation MCH 09 as a Major Employment Location. The RDS provides specific guidance for the location of MELs. MELs are zoned in the plan and represent employment sites strategically located throughout the BMA at Regional Gateways and along major transportation routes as directed by the RDS. Within the Castlereagh District the Purdysburn area is specified in the RDS as a strategic location for employment growth and is consequently zoned as a MEL in the plan to reflect RDS guidance. The RDS does not indicate a strategic location for employment growth on the Upper Newtownards Road. This zoning is for existing employment and there is no justification for designation as a MEL. We recommend no change in respect of this.

**Recommendation**

We recommend that the KSRs are amended to reflect the position in Part 1 regarding Use Classes.

**Objections to MCH 11 - Caborhill Industrial Estate, Beechill Road.**

**Objection 815**

The objector did not specify why the land identified should be removed from MCH 11 and we are unable to consider this objection any further. We recommend no change to the plan.
Objections to MCH 13 - Castlereagh Industrial Estate, Montgomery Road

Objections 333/2, 2666/5

The range of acceptable uses on Employment sites are set out in Part 1 of our report and this will address some concerns of the objectors. We do not agree with the objector that this zoning will prevent the re-use of land that has become redundant, will inhibit other uses coming forward, will restrict windfall opportunities or that it does not allow for the redevelopment of existing premises. Our conclusions on appropriate locations for offices are set out in Part 1 of this report. As this is not a MEL, Class B1 (a) will not be acceptable.

Objection 2666 sought the exclusion of the Police Service of Northern Ireland Estates Services Business Unit (ESBU) from MCH 13. It was previously unzoned in BUAP and its use has not changed. We agree that as it is not in employment / industrial use it can remain unzoned.

Recommendation

We recommend that objection site 2666 – Police Service of Northern Irelands ESBU unit - is deleted from MCH 13 and left unzoned.

Objections to MCH 14 - Montgomery Road

Objection 3701

Objectors seek the rezoning of MCH 14 as a DOS (mainly residential) as planning consent has been granted for a 65 unit residential development. This site has been developed for housing and it would therefore be illogical to be retained as employment land or designated as a DOS.

Recommendation

We recommend that MCH 14 - Dale Farm Ltd, Montgomery Road is deleted.
TRANSPORTATION

Rapid Transit Schemes

Proposals BT 14/01 & MCH 17/01 - EWAY

Proposal MCH 16 Quarry Corner – East Link Road

Objections 391, 429, 435, 468, 699, 702/6, 820, 886, 952, 1763, 1830, 2666, 2917, 3381, 3383, 3390, 4219 & 4232

This section will consider the entirety of the EWAY scheme from Belfast to Quarry Corner on the Newtownards Road. As such objections to BT 14/01, MCH 17/01 and MCH 16 will be considered here. The objections to the principle of the scheme arguing that the former rail line should be retained purely as a footpath and cycleway cannot be supported. No evidence was supplied to demonstrate how the proposal is seriously flawed. The RDS refers to the possible promotion of rapid transit type schemes in Chapter 11. The scheme is included in the BMTP, which has been prepared to implement the policies of the RTS (a sister strategy to the RDS). There are clear sustainability and environmental benefits in improvements to public transport. We are told that the detail of the scheme will make provision for footways and cycle lanes so that the current asset will not be lost. The Sustrans objection argued that the EWAY should be shown as a Community Greenway as well as a rapid transit route, since EWAY proposals include a parallel segregated path for walkers and cyclists; it considers that if EWAY is not provided, then the Greenway should be developed regardless. The route of the EWAY will be a part of the National Cycle Network. The route of the former railway currently provides a surfaced path for pedestrians and cyclists which is traffic free. It extends from Holywood Arches through East Belfast and Dundonald and extends into open countryside as far as Comber. It is well used by both pedestrians and cyclists providing a corridor link between the urban area and the countryside. Although it does not directly link areas of open space, it provides greater permeability of the urban area to pedestrians and cyclists allowing more convenient access to areas of open space than via the urban road system. As such, we consider that it fulfils the function of a Community Greenway as set out in Part 1 of the Plan. We consider it important that in the design of the EWAY, the asset is not lost and accordingly agree that the current route should be shown as a Community Greenway. The section of the EWAY between the Upper Newtownards and Comber Roads should also make provision for pedestrians and cyclists.

We consider that the use of the track by rapid transit vehicles would not be unduly disruptive to residents or pedestrians or cyclists. As the track is already in use by pedestrians and cyclists, the impact on the resident’s privacy or security would be limited and outweighed by the benefits of the scheme. The loss of habitat will be weighed at detailed stage against the sustainability benefits of the proposal but need not be an impediment that would justify rejection of the proposal at this stage. The line was formerly used for transportation purposes, in any event. No information on how the proposal would lead to increased pollution was provided. The scheme would result in less pollution by encouraging people to use public transport, in our opinion. The objectors seem to have missed the point of the new road (MCH 16). Its purpose is to
link the EWAY to the main transport corridor of the Newtownards Road and the Park and Ride at Millmount. The scheme is therefore a part of the public transport provisions of the plan and not merely a road proposal. The cost of the scheme as compared to buses is not a matter for the plan.

We have made our position clear on the speedy implementation of public transport schemes and this is doubly important in relation to this scheme as it is promoted as the pilot scheme. We have also made it clear that access to public transport is a key factor in determining the location of housing land in the plan area. The presence of the EWAY will be a one of a number of important factors to be taken into account in our consideration of objection sites seeking additional housing land (just as it was in the draft plan’s housing zonings). The issue of developer funding for the EWAY does not appear to have been pursued by the Department. It is stated that the necessary budget for implementation of the scheme has been set aside as part of BMTP.

The detailed scheme is in the course of preparation and that will address many of the site-specific issues raised. It is important to note that the scheme is also subject to separate consent procedures and a possible public inquiry. The objections are considered in this context. The road protection corridor is shown on Plan Amendment No. 1 Clarification Map No. 31 - Quarry Corner - East Link Road and EWAY (Rapid Transit Scheme). This is all the detail of the scheme that is before us.

There is no evidence that the scheme will adversely affect development at 2 Knockvale Grove. The site is not within the road protection corridor as shown on Plan Amendment No. 1 Clarification Map No. 31. We are unaware of any other plan proposal that could affect this site. The scheme with planning permission that is referred to in the objection appears to have been completed.

The PSNI objected to the route, presumably due to the loss of a car park associated with their HQ on Knock Road. However, we were provided with a letter from the Head of PSNI Estates acknowledging that the land in question is owned by DRD and that PSNI will have to vacate the land for the development of the EWAY. We therefore consider that the line of the scheme should not be varied to avoid this car park. This is a concern of the residents nearby who objected to the effect on their properties.

The concern related to the fact that the protection line deviates from the former rail line at its junction with Knock Road. BMTP states that the scheme will require the retention of the protection line for the E14 Comber Route scheme indicated in BUAP. We understand that the E14 proposal has been formally abandoned by Roads Service and indeed it is not included in this plan. There seems little logic in safeguarding the protection line of an abandoned road scheme, if that is what has occurred here. The EWAY should have its own identified protection line.

Turning to the line in this area as shown in the Plan and clarified in the plan amendment. The concern related to the extent of the road protection corridor and the effect that this would have on properties in King’s Road. These properties are set well back from the line of the EWAY and at a lower level. The gate lodge to no. 57 Knock Road is within the corridor. This part of the line is also within the King’s Road Conservation Area. There is a statutory duty to preserve or enhance the character and appearance of a Conservation Area when making planning decisions. The land to the
north of the former rail line falls steeply at this location. It contains mature trees and a stream. Any deviation in the line northwards would have significant detrimental effects on the Conservation Area and inevitably entail the extra costs associated with retaining structures and infilling the land. We agree with the objector that the width of the protection corridor appears far in excess of what would be required for the EWAY and a footway/cycleway. The existing footway/cycleway is approximately 3m wide for example. We consider that the scheme should be as sympathetic to the Conservation Area as possible. This would be a more important consideration than safeguarding car parking spaces for the PSNI. There appears to be no security issue with the existing footway/cycleway, which runs right next to the PSNI HQ. If another possible reason for the extra land is the provision of a stop in this area then we also agree with the objector that there appears to be ample unused land on the other side of the Knock Road. We therefore recommend that the line should adhere to the former rail line and avoid the King’s Road Conservation Area as much as possible.

The existing footway/cycleway utilises request traffic lights for pedestrians and cyclists to cross Knock Road. We see no reason why the EWAY cannot operate in a similar manner. The matters of the number, location and design of crossings are detailed ones to be considered later. We are sure that the Departments will have regard to the existence of pedestrian crossing points when making these decisions. Similarly minimising the impact of Proposal MCH 16 on the drumlin landscape will be addressed in the detailed design. The possibility of a Mesolithic site on the route would be addressed in the detailed design of the scheme, which would be required to comply with all statutory procedures. The NIEA raised no concerns in this regard in relation to the Plan or BMTP. We note that the route is wholly within a committed housing zoning in the plan (MCH 03/12) and this land will be developed anyway in due course. The traffic implications and impact on the surrounding road network are matters to be addressed in the detailed design and we cannot comment further on them as part of this process.

**Recommendations**

We recommend that:

- The EWAY be shown as a Community Greenway and the detailed design makes provision for pedestrians and cyclists.

- The Department reviews the width of the Road Protection Corridor (as shown on Plan Amendment No. 1 Clarification Map No. 31) in the area to the west of Knock Road in order to minimise the impact on King’s Road Conservation Area.
Objections to proposals BT 014/03 and MCH 17/02 - Rapid Transit Scheme
SuperRoute

Objections 266, 699/22, 820/44&45, 942/3, 959/8, 1038, 1053, 1080, 1083, 1120, 1128, 1131, 1136, 1139, 1141, 1143,1150, 1152, 1163, 1216, 1255, 1260, 1269, 1274, 1279, 1274, 1279, 1284, 1301, 1306, 1309, 1313, 1314, 1348/1, 1492, 1502, 1507, 1510, 1520,1531, 1534, 1539, 1819, 1848, 1852, 1854, 1858, 1924, 1930/1&2, 2145, 2166, 2213, 2220, 2259, 2293, 2328, 2334, 2661, 2913/4, 2965/22, 3861, 4212, 4257/5

This section will consider the entirety of the SuperRoute in both Belfast and Castlereagh Districts. The BMTP proposed the SuperRoute Rapid Transit Scheme to link Belfast City Centre with Cairnshill Park and Ride on the Downpatrick Metropolitan Transport Corridor. This proposal has been carried through to BMAP and the land use implications are shown on Plan Amendment No 1. Most of the objections related to the section of the proposed route between Annadale Embankment and Belvoir Road where it crosses the Lagan Valley Regional Park. The objectors expressed concerns about environmental matters including the impact on Belvoir Park Forest which contains many very old and valuable trees, the effect on biodiversity, fragmentation of habitats, severance of the historic Belvoir Demesne, impact on the historic Breda graveyard and impact on Belvoir Park Golf Course. The Department’s position at the Inquiry was that the route indicated between Belvoir Park Forest and Belvoir Park Golf Club was the preferred route but that further assessments needed to be undertaken and alternatives could not be ruled out. On this basis the Department was content that the precise line where it crosses the countryside could be removed from Map 32 and the line on Map 19 would be replaced with an indicative line. The explanatory text of Proposal MCH 17 would be amended as follows; “An indicative line is shown across the Castlereagh countryside between 2 points as indicated on Map 19. The final precise line, should this remain the preferred route, will be determined following further assessment and by way of a separate statutory process that will afford appropriate public consultation.” This amendment satisfied some of the objectors but others were concerned that it established the principle of a route through Belvoir without examining other alternatives. We consider that the inclusion of “should this be the preferred route” suggests that other alternatives will be examined. Notwithstanding the desirability of providing a dedicated public transport route to the south eastern part of the city (which would also allow convenient access to the Major Employment Location at Purdysburn), in view of the sensitivity of the route chosen, we consider that alternatives need to be fully investigated to ensure that the route proposed is the optimum solution. Part of this exercise should involve consideration of whether the route should seek to serve the Belvoir Estate, Saintfield and Ormeau Roads and Forestside as suggested by objectors. The practicalities of using the road network at Stranmillis for rapid transit also need to be addressed. Until a more detailed analysis of possible alternatives has been undertaken and the environmental impacts of the proposed route are known, we consider that it would be premature even to show an indicative line for this part of the route through Lagan Valley Regional Park. In any case, the absence of such protection is unlikely to prejudice future provision of the scheme as there is a presumption against development in the Park. Accordingly, we conclude that the protection provided through BMAP should relate only to the urban sections of the proposed route.

The Department’s amendment related specifically to Proposal MCH 17 but concerns have also been raised about the section of Proposal BT 014 between Belvoir and
Annadale on the basis of its importance to the setting of the Lagan Corridor. As this section of the route is a continuation of the rural route through Belvoir Park Forest/Golf Club, removal of the protection corridor for this section would also be appropriate. This would also address objection 266 which sought clarification of the proposal in relation to zoning SB 05/04.

Objection 1348 objected to the impact of the proposal on Newtownbreda High School. The protection corridor suggested a loss of around 1 ha which would impact on the school’s amenity space and may be required in the future for new school buildings. No plans had been drawn up to redevelop the school at the time of the Inquiry. The protection corridor at the school includes land for both the Saintfield Road Relief Road and the SuperRoute. The Department emphasised that the land take in the Plan was a protection corridor and it may not all be required. There would also be detailed discussion with the school to minimise impact on it. In view of the fact that the route in this area has limited flexibility and is surrounded by urban land that could be developed for a range of uses, we consider that the transport proposals in this area could be prejudiced if protection was not afforded through the Plan. We therefore conclude that it would be prudent to protect this part of the scheme. For the same reason we consider that protection should continue to be afforded to the lands identified in objection 1924.

Recommendations

We recommend that:

- The countryside section of the road protection corridor on Plan Amendment No 1 Clarification Map No 32 - SuperRoute is deleted between Annadale Embankment and Belvoir Road.

- The countryside section of the Rapid Transit Scheme on Plan Amendment No 1 Map No 19 - Belfast/Castlereagh is deleted between Annadale Embankment and Belvoir Road.

- The explanatory text for Proposals BT 014 and MCH 17 is amended to read: “The Department’s preferred route for the SuperRoute proposal is across the Belfast and Castlereagh countryside between Annadale Embankment and Belvoir Road. Further assessment of this part of the proposal will be undertaken, including alternative routes, and the final precise line will be determined by way of a separate statutory process that will afford appropriate public consultation.”

Objection in respect of road schemes in Castlereagh

Objection 699/25

Castlereagh Borough Council was concerned about the implementation of road schemes A24 to A55 and A22 to A24. Plan Amendment No 1 proposes a new link between Cairnshill and Newtownbreda as a strategic road scheme to provide relief to the existing A24 Saintfield Road and the junction with the A55 Outer Ring - Proposal PA 05. The route will follow the line of the SuperRoute and is programmed beyond the end of the Plan period. We note that no sources of funding have been identified for the
proposal. It is difficult to see how developer contributions could be required for this scheme as it is strategic in nature and there is no specific development that would require its provision. The timing of implementation of transportation schemes is outwith the scope of the Plan. The Council’s concerns appear to be related to current road conditions and there are a number of measures in the Plan aimed at easing traffic pressures along this route. The Park and Ride site at Cairnshill is now operational and Saintfield Road/Ormeau Road is also identified as a Quality Bus Corridor. In the longer term the SuperRoute is also aimed at easing congestion on this road.

Proposal MCH 16 is intended to be developed in conjunction with the EWAY and is identified as a non-strategic road scheme intended to provide traffic relief to the A20 through Dundonald. We note the Department’s evidence that it is to be funded by the Department and identified for implementation within the Plan period. This should address the Council’s concerns. We recommend no change to the Plan as a result of this objection.

**Park and Ride Sites**

**MCH 18/01 Cairnshill**

**Objections 3295, 3378**

We note that this Park and Ride site is operational. In these circumstances the objections relating to the housing zoning and DOS (retailing) must fail. Accordingly, we recommend no change to the Plan.

**MCH 18/02 Millmount**

**Objections 383/3, 468/14, 886/1**

The Park and Ride site at Millmount is identified as an appropriate location to be developed in conjunction with the proposed EWAY rapid transit proposals. Its location on the Comber Road will attract traffic on this busy route. People on the Newtownards corridor will be able to reach it by using the Quarry Corner - East Link Road which will be on their way to Belfast and then be able to travel on the EWAY rapid transit system. It is important that the Park and Ride site adjoins the proposed EWAY. We agree with the Department that this is not the case for the objector’s alternative suggestions and a Park and Ride site is unlikely to create vitality in the immediate vicinity due its function for long stay parking. The Park and Ride site at Millmount will not attract traffic into Dundonald village but in fact will divert more traffic from it and the road into Belfast City Centre by providing an alternative to using the car for the whole journey into the city. As we have confirmed the location of the Millmount Park and Ride site it is illogical to include it within LLPA 42. A Park and Ride facility would not exhibit sufficient environmental quality that would render it suitable as an LLPA. We recommend no change to the plan.
RETAILING

Designation MCH 19/01 - Forestside District Centre

Objections 191/1, 699/29, 910/2, 1010/1

The objections sought the inclusion of additional lands within the designation. The sites all relate to the lands to the north of the District Centre between Saintfield Road, Upper Galwally, residential streets – Galwally Park/Drumkeen Court & Manor and Upper Knockbreda Road (A55). Objections 910 and 1010 relate to all these lands. Objection 191 relates to the Homebase store only and objection 699/29 relates to Drumkeen Retail Park only.

The designated District Centre includes the covered shopping mall and the adjoining car parks. The excluded area contains the following from west to east: Homebase in its own grounds, some offices, residential properties, Castlereagh Borough Council offices and Drumkeen Retail Park, which includes JJB sports, Harry Corry, Smyths Toys, Currys, a large Burger King and a Sainsbury’s petrol filling station. It is debateable as to whether some of these uses constitute bulky goods retailing and they obviously meet some local needs.

We concluded in Part 1 of our report that city and town centres were the preferred location for major retail proposals. District Centres have a role to play but that should be a supporting role. We also acknowledged that some District Centres in the BMA contain a level of retailing that extends well beyond meeting a local need. We resisted calls to elevate them in the retail hierarchy and concluded that further development at Abbey Centre, Forestside and Bloomfield should be strictly controlled in order to achieve the strategic objectives of promoting the role of city and town centres.

In this strategic context, we generally conclude that the boundaries of District Centres should be controlled. Their expansion could be justified to include retail units serving a local need but that does not arise in this case. Arguments that the units within the designated centre do not meet the criteria in paragraph 49 of PPS 5 do not justify inclusion of the objection lands which perform a different retail function.

The retail units within the objection sites are mostly retail warehouses. They do not provide convenience retailing or shops whose primary function is to meet a local need. Homebase is a free standing retail warehouse and Drumkeen is a retail warehouse park in PPS 5 terms; there is no policy support for individual retail warehouses or retail warehouse parks to locate in District Centres. Neither PPS 5 nor our strategic conclusions on retailing in Part 1 of the report favour the inclusion of the objection sites in the District Centre. If they were included, PPS5 would afford them the same protection as existing centres. The status of floorspace conditions limiting the minimum size of the existing units and the range of goods to be sold could also be challenged on the basis that units were now inside the District Centre. We consider that the ramifications of such inclusion could undermine the Plan’s objective of promoting the role of city and town centres. The inclusion of the objection lands as a separate retail warehouse area within the District Centre would be pointless as it would not change the status of the area in retail terms and could lead to confusion.
The Commission has previously expressed the view that this area is part of Forestside. This view was expressed in the evidential context of an individual appeal and does not constrain the proper consideration of all the issues as part of the development plan process. The existence of retail warehousing and offices on the edge of a District Centre is not justification for their inclusion in a centre which has a different retail function in PPS 5 terms. Exclusion of these areas from the District Centre will not alter their retail status in policy terms. We cannot agree that the Plan is an opportunity to include this area merely because this is the first time that the District Centre has been defined. We have set out our view on the matter and concluded that the retail warehouses should be excluded for the reasons given.

This District Centre is well served by public transport and is convenient to large areas of housing. It is therefore in a sustainable location to provide services to this part of the BMA. The fact that the Mall and retail warehouses have adjoining accesses and are located beside one another means that there is the opportunity for linked trips. The Department accepted this and that the retail warehouses add to the offer available in the District Centre. We do not consider that this is an issue related to room for the centre’s expansion. The offices within the objection sites are not of the local office type envisaged by PPS5 and so would not fit within the District Centre designation either. The restaurant and petrol filling station within the objection sites might be considered to meet the needs of the district, but it would not be appropriate to include these units as they lie on the opposite side of the road from the Centre. Also, as they were not the subject of separate objection, they can only be considered as part of the larger objection sites. The residential area within objection 191 is not a suitable use for inclusion within a District Centre.

We are aware of areas of retail warehousing being included within the designations of other District Centres. We also note the Departmental concessions that brought even more retail warehouses within the District Centre boundary at Abbey Centre. We are not persuaded that contrary decisions elsewhere, or poor development management decisions, should justify a repetition in other locations or constrain the proper planning of this area.

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

**Designation MCH 20/01 - Dundonald Local Centre**

**Upper Newtownards Road/Dunlady Road junction**

**Objections 699/30 & 900**

The objections seek the inclusion of a large site to the rear and east of the Lidl supermarket in the local centre. The evidence was that the site had planning permission for open class 1 retail development on 1.79 hectares to the rear of the Lidl store. The Department’s evidence was confusing. Their recommendation was that the Lidl store and car parking should be included in the local centre and the remainder of the site excluded because it had planning permission for residential development. The Lidl store already appears to be in the local centre in the plan with only part of the car park to the side excluded. The Lidl store is not part of the objection sites either: they relate to the land to the rear and east. We have examined the planning history
submitted by the Department and there is reference to several approvals for retail development on lands to the rear of the Lidl store. Consequently it appears that the planning history of the actual objection site does not appear to have been correctly identified by the Department and as a result has not been properly taken into account. We recommend that the Department re-considers the objections in the light of these comments. It would appear logical to consider the inclusion of any part of the site with planning permission for retail development in the local centre.

**Lands between Asda and Robb’s Road**

**Objection 3202**

The objection sought the expansion of the centre south of Upper Newtownards Road to the east as far as Robb’s Road. The Department agreed that three properties should be included in the centre but not the rest of the site. We agree that the above properties can be included. The remainder of the site consists of residential properties and vacant buildings including a vacant and derelict car sales showroom. The Department informed us that these premises had planning permission for residential development. As this site is largely residential and contains little active retail use, we consider that there should be no other change to the plan as a result of this objection.

**Recommendation**

We recommend that nos. 1003, 1005 and 1007 Upper Newtownards Road are included in Designation MCH 20/01 - Dundonald Local Centre.

**Designation MCH 20/01**

**Objections 521/1 and 468/3**

Objections state concern about the further development of retail warehouses in the centre as referred to in the Plan. The Plan does not refer to warehouses at all; rather it describes the role of a local centre and states that it includes non-bulky comparison shopping. The Plan merely designates a boundary for the centre. The type of retail units approved within the centre is a matter for the development management process. We consider that these comments equally apply to any site specific retail concerns that may be contained within objection 468/3. We recommend no change to the Plan.

**Objections seeking Additional District and Local Centres**

**Suggested Local Centre, Kings Square Shopping Centre, King’s Road**

**Objection 2757**

The objection refers to the centre being locally important and providing convenience goods and services. We shall therefore consider the objection as seeking a Local Centre designation. The Kings Square Shopping Centre appears to partially fulfil the role and meet the definition of a District Centre as stated in PPS5. However, the range of shops and services in the centre are commensurate with those found at a local level
in the BMA, given the larger populations found in the city. We therefore agree that the site should be designated as a Local Centre in the Plan as requested.

**Recommendation**

We recommend that the objection site is designated as a Local Centre in the Plan.

**Suggested District Centre, Newtownbreda Road, Castlereagh**

*(Objection 3291)*

The site contains a large superstore (Tesco) and no other retail or service uses. The glossary to Planning Policy Statement 5 defines a District Centre as a group of shops and non-retail service uses. The presence of a single superstore does not justify a District Centre designation on this site. Forestside District Centre is a short distance away and another District Centre is not warranted in such close proximity. The objection was not supported with any evidence or justification for the suggested designation and so there is nothing further for us to consider. We recommend no change to the Plan as a result of this objection.
URBAN ENVIRONMENT

MCH 21 & MCH 22: Arterial Routes

Objection 2760/44/45

This was a general objection to the Arterial Routes policy and design criteria. However, this objection was of a general nature and no specific arguments were presented that would enable our further considerations of the matter. Accordingly, we recommend no change to the Plan.

Objection to the failure to provide a Local Plan for Dundonald and objection to Arterial Routes Urban Design Policy - MCH 22

Objection 468/4

DGBA sought a ‘masterplan’ for Dundonald. They stated that the Draft plan does not contain adequate structure for positively channelling redevelopment pressure and that Arterial routes guidance (policy MCH 22) is not enough. A masterplan for Dundonald is beyond the scope of our remit and is a matter for the Department which may well wish to consider such a plan for Dundonald. The objector did not present any arguments in relation to the Urban Design policy for Arterial routes and we are unable to comment any further on this element of the objection. Accordingly, we recommend no change to the plan.

Proposed Dundonald Underpass

Objection 468/4

This objection suggested an underpass be provided to remove all through traffic from Dundonald. It was claimed that this would accord with the RDS and meet the criteria for schemes as it would relieve congestion at a significant bottleneck on the strategic highway network. The environmental benefits of the proposal were explained and the objection was couched in terms of the streetscape improvements that could be realised. This would be an innovative urban realm project that would have a flagship role in a European context. It was also suggested that a local bus service be considered to get people to the Quality Bus Corridor.

The Department explained that the proposed EWAY rapid transit scheme and associated Quarry Corner - East Link Road with park and ride proposal would take much of the traffic from Dundonald. The cost of an underpass would be prohibitive and such a proposal should have been considered in BMTP. The area had been considered and the outcome was the proposed rapid transit scheme and Quality Bus Corridor. The suggestion regarding a local bus service is a matter for Translink. This would not have any land use implications and any additional text in BMAP would be for information only.

We consider that these objections are related to BMTP and therefore not matters to be addressed in our report. The streetscape and environmental issues in Dundonald have been considered elsewhere in our report. Whether additional text regarding a local bus service is considered...
service is added is a matter for the Department. Accordingly, we recommend no change to the Plan.

Areas of Townscape Character

Our recommendations in Part 1 included that Policy UE 3 should be deleted and a detailed character analysis undertaken and design guide produced for each individual ATC. This document should be produced in the form of supplementary guidance to the Plan. In light of this we will not comment any further on objections to the key design criteria proposed. We will therefore only consider specific objections to the boundaries of each ATC and key features as appropriate.

Objections to all ATCs in Castlereagh - Designations MCH 23 - MCH 28

Objection 3794

This objection referred to all ATCs throughout Castlereagh. It stated that none in whole or in part justify their designation and sought deletion of some or all of the ATCs or modifications to their boundaries. No specific arguments were presented that would enable our further consideration of this matter. We recommend no change to the Plan.

MCH 23 - Cregagh

Objection 3825/16

The NIHE objected to this ATC as they believe the designation will have implications for future improvements to Housing Executive stock. This is not a reason to delete the ATC as it would not impose an embargo on improvements. We recommend no change to the Plan.

MCH 24 - Cregagh Park and Everton Drive

Objections 988/1, 3825/15

The NIHE requested that an area of land at Cregagh Park which is Council owned should be omitted from the ATC, however the extent of the objection site was not identified and no evidence was submitted to support this objection. We are unable to consider this objection any further. Similarly, objection 988 supplied no plans to identify the objection site. However, from the brief description provided we assume the objection site is an open landscaped area to the north eastern corner of the ATC designation. The objector’s only concern related to dumping and bonfires. Exclusion from the ATC would not address these problems. We recommend no change to the plan.

MCH 25 - Area of Townscape Character Dundonald

Objection 468/2

DGBA objected to the key features listed for MCH 25. However, at the Inquiry the Department conceded to extend the list of key features to include and individually
identify the churches and both old National School Buildings as requested by DGBA. It is clear that these are important features within this ATC. We concur with the Department’s recommendations.

**Recommendation**

We recommend that these buildings are recognised as key features within MCH 25.

**Objection seeking the designation of additional ATCs**

**Objection 699/34**

Castlereagh Borough Council suggested additional ATCs as follows:

Knockbreda: Objection lands include the Knockbreda Church of Ireland and grounds along with its extensive cemetery grounds, Knockbreda Parochial Hall and various properties along Church Road including some redeveloped sites. The cemetery and Church grounds already benefit from an LLPA designation MCH 41 which covers most of the objection site. The Church is listed and is therefore accorded statutory protection. An ATC designation would not add anything. The objection lands do not bear any relationship with MCH 26 due to the location of the road and therefore could not form an extension of MCH 26. We recommend no change to the Plan.

Belvoir Housing Estate: This is an extensive area characterised with 2 storey and single storey properties and tower blocks interspersed with open space and parking bays. It is a typical Housing Executive medium density type estate. Whilst there is general uniformity in design, neither the quality of the design or landscaping would merit an ATC designation. CBC have not indicated an actual objection site as such and have just marked the general area on a map with a star. Neither have they identified the features which they consider worthy of an ATC designation for our consideration. We recommend no change.

**Urban Landscape Wedge**

**Designation MCH 30 Dundonald Urban Landscape Wedge and Designation MCH 31 Dundonald Leisure Park**

Objections 699/37/38, 779, 2848, 273/1, 436/2, 468/10, 521/3, 699/38, 779/1, 2848/1, 3861/4, 4219/2

MCH 30 designates an Urban Landscape Wedge (ULW) at Dundonald which includes Knock Golf Course, Dundonald Cemetery and Dundonald Leisure Park designation MCH 31. That portion of the ULW which lies within Castlereagh is almost entirely co-terminus with the boundary of the Leisure Park and for this reason we consider objections to the two designations together. There are four clusters of development within the Wedge – a small business park to the north west, a recently constructed cinema/restaurant complex known as Eastpoint on the northern side of Old Dundonald Road, and the David Lloyd and Dundonald Ice Bowl complexes to the south of Old Dundonald Road. With the exception of the business park, the uses may be described...
as recreation, leisure and tourism uses which have been developed in accordance with policies contained in the BUAP.

The clear direction of the policies as set out in BMAP is aimed at protecting the integrity of the ULW. The explanatory text in relation to the Wedge sets out clearly the objectives of visual separation of the communities of east Belfast and Dundonald and MCH 31 aims to control development within the Leisure Park by ensuring that built development is grouped with existing buildings to ensure visual separation between these elements and existing open areas. We note that the recently constructed Eastpoint development encroaches significantly into the western part of the ULW. We agree that as it is now developed, references to proposals for a Leisure Park in the preamble on page 52 should be deleted.

There were strongly opposing views about the future direction of these designations. Whilst DGBA recognised the attempts to tighten development through Designation MCH 31, they stated that the criteria did not go far enough and that the wedge needs treated with greater sensitivity. They sought a cessation of development to protect the wedge and sought restrictions on use to outdoor recreation or open space only. By contrast, CBC found the criteria too restrictive in facilitating the future development of the Leisure Park. They stated their commitment to the creation of a world class facility and tourist attraction, building on the success and international status of the existing Ice Bowl. They sought amendment of ‘outdoor recreation’ to ‘recreation’ and wanted to include leisure as an acceptable land use. They state that an integral element considered essential in reinforcing the site is a proposed small hotel which would provide necessary accommodation to service the Leisure Park during sporting events.

We consider that the ULW has been seriously eroded by successive developments. The Council’s ambitions are not evident in the recent cinema complex which, although a significant local attraction, can hardly be said to contribute to their aspirations for world class facilities. We see no reason why a hotel needs to be provided in the Leisure Park to serve the existing development. Apart from the hotel, the Council provided no detail of the type of facilities they had in mind, nor did they provide any indication of the likely implications of any built development for the ULW. In our view, tourism and leisure uses are likely to create a demand for further built development. In view of the objective to promote visual separation between East Belfast and Dundonald, we consider that the amendments sought by CBC would be likely to further erode the Wedge. By contrast, outdoor recreation and open space uses would complement the existing built development and would be unlikely to create a demand for significant additional buildings. If the ULW is to perform its strategic function, further built development will need to be strictly controlled. We therefore disagree with CBC that the range of uses should be amended as proposed by them. We also accept the DGBA submission that tourism uses should be excluded from the range of acceptable uses.

It was suggested that bullet point 3 should be amended to read “No substantial new building or structure will be permitted within the bounds of Dundonald Leisure Park”. Suggestions were made for additional text to state “Extensions to existing buildings shall not be permitted”. We consider that the latter addition is too restrictive and that there has to be scope for modest extensions, necessary to the function of the existing facilities. In view of our comments about the extent of development already permitted, however, we endorse the deletion of the third bullet point and its replacement with the
suggested text in order to minimise built development across the ULW. This would allow for buildings to complement recreation uses such as changing rooms etc. It would be logical to include this as part of the first bullet point to provide a context for the first bullet point as currently worded.

We note that the 2nd bullet point has been deleted from the Designation in Plan Amendment no 1 (page 60).

We see no difference between the wording suggested by DGBA in respect of the 9th bullet point and as worded in the Plan. We accept, however, that reference could be made to the EWAY in the supporting text.

Objection 2848 sought the exclusion of the Leisure Park from the Urban Landscape Wedge. There were also objections requiring policy to be toughened and suggestions that it was too vague. No further details were submitted with these objections and we are unable to make any recommendations based on them.

We turn now to objections seeking amendments to the ULW. CBC objected to the inclusion of the Hanwood Development located within the western edge of the Dundonald Landscape Wedge. The Hanwood Development is a local community economic development initiative which at the time of submissions was the subject of a planning application. It is excluded from the Dundonald Leisure Park. We note that the Hanwood Business Park is now constructed. As a result of the development we accept that it no longer functions as part of the ULW. Due to its peripheral location we recommend that the extent of the landscape wedge is reduced to exclude the constructed Hanwood Business Park.

Objection 779 sought the removal of a portion of land at 125 Old Dundonald Road from both MCH 30 and MCH 31. The objection lands are zoned for housing under designation MCH 03/09 which is noted in the plan to have outline approval for 18 dwellings and we note that the latest approval is for 45 apartments. It is surrounded by the ULW and Leisure Park and it would be illogical to exclude it from the designations. We acknowledge that the zoning of part of the area for housing will result in further built development within the Wedge but such a situation is inevitable in view of the planning history of the site.

CBC sought the extension of the settlement limit to the southern side of the Leisure Park as the existing boundary follows no definable boundary. We find the current boundary acceptable and see no reason to extend the designation into the open countryside.

Recommendations

MCH 31 - Dundonald Leisure Park

We recommend that:

• The reference to tourism and tourist related development should be deleted from the designation.

• A sentence should be added to the beginning of the first bullet point as follows:
“*No substantial new building or structure will be permitted within the bounds of Dundonald Leisure Park*.”

- The third bullet point should be deleted.
- The explanatory text should make reference to the EWAY.
- References to proposals for a Leisure Park in the preamble on page 52 should be deleted.

**MCH 30 Dundonald Urban Landscape Wedge**

We recommend that the extent of the Urban Landscape Wedge is reduced to exclude the Hanwood Business Park.
NATURAL ENVIRONMENT

Objections to Sites of Local Nature Conservation Importance

**MCH 32/03 - Belvoir**

Objections 2145/7, 2965/49

The Forest of Belfast and BCC sought the extension of MCH 32 - Belvoir SLNCI to include lands at Belvoir Park golf course. The Department considered that the objection lands contained woodland and mature trees and characteristics similar to Belvoir Park that were deemed to merit designation as a SLNCI. Therefore they considered that the objection lands merits inclusion within the SLNCI and would provide a valuable contribution to the Belvoir SLNCI. We concur with the Department’s view.

**Recommendation**

We recommend that the MCH 32/03 is extended to include Belvoir Park Golf Course as indicated on Plan 6.

**MCH 32/05 - Craigantlet Woods**

Objections 1742/3, 3072/5

This objection was to elements which would affect development on the MCH 09 Employment zoning, one of which was Craigantlet Woods SLNCI - a small part of which extends into the MCH 09 zoning. The objector did not explain how the SLNCI designation on a tiny portion of the site would be detrimental to the designation of MCH 09 Employment Zoning, nor was any evidence presented as to the nature conservation value of this part of the SLNCI. Accordingly, we recommend no change to the Plan.

**Objections to Local Landscape Policy Area Designations**

**MCH 35 LLPA - Cregagh**

Objection 699/40

CBC sought the exclusion of social housing designation MCH 06/01 Land at South Bank and Cappagh Gardens (Cregagh Community Centre) from the LLPA. We note that a social housing scheme has already been built on the zoning 06/01. We consider that this built development does not contribute to the overall LLPA, the remainder of which is an extensive open area shown as an area of open space. Given this, we consider that the LLPA designation on the objection lands cannot be justified and that the objection lands should be removed from the LLPA.

**Recommendation**

We recommend that the objection site is excluded from the LLPA MCH 35 Cregagh.
**MCH 37 LLPA - Dunlady Glen**

**Objection 468/6**

The Department conceded that the portion of the objection lands which include the Rath and its immediate setting on the western boundary of the LLPA should be included within Dunlady Glen LLPA in order to recognise and protect the historical, landscape and visual merits of the archaeological feature and its setting. We concur with this recommendation of this element of the objection. We also agree with the Department that the Dundonald High School Playing Fields do not meet the criteria for inclusion within the LLPA MCH 37 and are correctly identified as an area of Open Space. Objectors were satisfied with the Department’s concession.

Map 2a seems to indicate the extension of MCH 37 southwards to the Newtownards Road along the western edge of the High School, whereas map 2b indicates the LLPA stopping at the playing fields. The Department have acknowledged this mapping error and have indicated the correct position as indicated on Map 2a.

**Recommendation**

We recommend that LLPA - MCH 37 is extended to include the lands as indicated on Plan 7.

**MCH 38 - LLPA Forster Green**

**Objections 906/5 and 1268**

The objections sought re-designation of the LLPA to health use as it was considered that the LLPA places an undue constraint on the development of health care services on the Forster Green site. This extensive LLPA zoning is to the south of the Forster Green Complex on rising lands to the rear of the existing buildings. The LLPA also includes designation MCH 32/09 - Forster Green SLNCI which wraps around the south west of the hospital building. Most of the LLPA is also identified as an area of existing open space. There is no objection to the SLNCI or the open space zoning. The site is located adjacent to the very busy junction of the outer ring road, the Upper Knockbreda Road/Belvoir Road and the Saintfield Road.

At the Inquiry the objector sought the reduction in the LLPA to generally align with the perimeter bands of trees with development pockets in between to be zoned for mixed health and residential use or alternatively left unzoned. It was argued that KSRs - which would only apply to zoned health and residential land - could provide gain, enhancement and long term management for the SLNCI.

We can not consider residential land as it is outside the scope of the original objection. We therefore continue our consideration to the objection as submitted.

At the Inquiry the Department stated that the LLPA should remain with the understanding that it does not preclude development. This statement can not be correct in the context that the site is shown as existing open space. The objector pointed out that this is a Healthcare site and is not public open space and anyone on
the site is trespassing. Irrespective of public access, the site accords with the definition of open space set out in PPS 8.

We agree with the Department that development of the objection lands will have an adverse impact on the vegetation within the site and on the boundaries both initially, through the loss of trees as a direct result of development and in the longer term, with regard to the continued health and safety of the trees in relation to any future development. In addition, the removal of vegetation and new development will impact on the views from the community greenway which lies adjacent to the LLPA.

Although there is no objection to the SLNCI, development of the site will have an adverse impact on the wildlife and nature conservation value of the area. We note that one of the proposed development pockets overlaps with the SLNCI designation.

We consider that that the objection lands should remain designated as MCH 38 - Forster Green LLPA, as these lands contribute to the intrinsic environmental value and character of the area and help protect the visual amenity and local landscape setting. We consider that development of the objection lands will change the landscape and visual character from mature trees, vegetation and open grassed areas on rising land providing a vegetated backdrop to the Forster Green Site. We consider that the open green spaces set within the heavily treed bands are an integral part of the LLPA and zoning these as intensive development pockets as proposed by the objector would be detrimental to the integrity of the overall LLPA. It is an area of particular landscape and visual significance located at a busy road junction. We consider that the LLPA designation is justified on the site.

We were provided with no evidence of future health care needs for the site. If the Trust anticipated such needs over the Plan period we would have expected them to maintain their objection to the housing zoning on the current Forster Green site. We are not persuaded that the possibility of some future health care needs should outweigh our conclusions about the value of the LLPA. Should such needs arise in the future they can be considered in the context of the environmental designations on the site and prevailing regional policy. Accordingly, we recommend no change to the Plan.

MCH 42 LLPA - Moat/Enler

Objections 383/4, 468/5, 813, 699/41, 2758/1, 468/5

The Department conceded that objection lands should be included within Moat/Enler LLPA with the exception of those portions zoned for housing and Millmount Park and Ride facility. This includes amenity space to the rear of Longstone School and an extension of the LLPA north eastward to the Upper Newtownards Road exiting adjacent to Old Mill Heights. This was on the basis that these lands contribute to the intrinsic environmental value and character of the area and will protect the visual amenity and local landscape setting of the area. We endorse this and the DGBA confirmed at the Inquiry that they were satisfied with this concession. The objector also sought the revision of the southern border of the LLPA to include the proposed Park and Ride site which they sought to be relocated. As we have recommended that the location of the Millmount Park and Ride is confirmed it is not logical to extend the LLPA.
CBC seeks the exclusion of a site at East Link Road from MCH 42 as they state that it is surplus to requirements by the Council and sale agreed for residential. The Council sought a housing zoning. Objection 813 also sought the exclusion of this objection site from the LLPA and Open Space Designation.

The objection lands are located within Moat Park and comprise an area of hard standing fronting East Link Road behind which is an area of amenity grassland with some trees. To the south west is the bowling green. Immediately to the north-west is the Enler River beyond which rises the localised hill with the historic motte.

We agree with the Department that the objection site adds to and forms part of the views and setting of Dundonald Motte, a Scheduled Monument, and Saint Elizabeth’s Church, a locally significant building, its graveyard and the Cleland Mausoleum. Development of the objection site would impact on the setting of and views towards the Monument and the adjacent locally significant buildings. The objection site and its open character maintains a visual link across East Link Road between the two areas of Moat Park. Development of the objection site would lead to further build up along East Link Road, the reduction of open space fronting the public road and would break the visual linkage between the two areas of the Park.

We also agree with the Department that the inclusion of the objection site within the LLPA MCH 42 designation recognises the importance of maintaining the open aspect from the public road towards the main body of Moat Park and the backdrop of the scheduled monument. Development of the site would adversely impact on this open aspect.

Moat Park has also been identified as “An Area of Existing Open Space” in recognition of its landscape amenity and recreational value. PPS 8 Policy OS 1 establishes a presumption against the loss of open space irrespective of its physical condition and appearance. Therefore the objection site irrespective of its current condition is considered an important component of an existing open space resource which should be protected.

Development of the objection lands will change the landscape and visual character from an open area of hardstanding backed with trees in grass to the built form of housing development with associated dwellings, roads, lighting etc.

The Department considers that the objection lands at Moat Park should remain within LLPA MCH 42, as these lands contribute to the intrinsic environmental value and character of the area and help protect the visual amenity and local landscape setting. We agree with the Department’s position. Irrespective of the Council’s proposals, in the absence of any evidence of a planning approval for residential use, we concur with the Department’s view that this land should remain within the LLPA and should not be zoned for housing. We recommend no change to the plan as a result of this objection.

Objection 2758/1 sought the removal of a portion of land on the Comber Road from LLPA MCH 42 as it has been granted approval for residential development and no longer warrants this designation. The Department acknowledge that development on the objection site has impacted on the LLPA and suggest exclusion of these lands from it. We concur with this recommendation.
Recommendation

We recommend that LLPA MCH 42:

- is extended to include the lands as indicated on Plan 8; and
- is amended to exclude objection site 2758/1.

MCH 43 LLPA - Newtownbreda

Objection 1348/3

The Department has conceded that the objection lands associated with the developed part of the site including the school buildings, associated hard standing, car parking and sports pitches do not meet the criteria for inclusion within an LLPA. However the trees along the frontage of the school should remain within the LLPA for their landscape and visual significance along the Newtownbreda Road together with the trees along the north eastern boundary which contribute to the landscape and visual amenity value of the stream. We concur with the Department’s recommendations.

Recommendation

We recommend that MCH 43 excludes the objection lands 1348/3 as indicated on Plan 9

MCH 44 LLPA - Tullycarnet (also to the identification as open space)

Objection 699/42

CBC sought the removal of an objection site at Geary Road from the LLPA as they have declared it surplus to requirements and it has been agreed for sale for residential purposes. They sought a housing zoning. They also objected to its identification as open space. MCH 44 is an extensive LLPA covering Tullycarnet Park, a municipal park on steeply sloping ground containing a nursery, playground, pavilion and bowling green. The entirety of the LLPA is also indicated as an area of open space. We consider that the objection site contributes to the integrity of the LLPA and open space and do not consider that it should be removed from the designation. Irrespective of the Council’s proposals, in the absence of any evidence of a planning approval for residential use we concur with the Department’s view that the objection lands should remain within the LLPA and should not be zoned for housing. Accordingly, we recommend no change to the Plan.
OPEN SPACE, SPORT AND OUTDOOR RECREATION

Community Greenways

Objection seeking designation of Community Greenways at Dundonald

Objection 468/7, 702/6

The objection from Dundonald Green Belt Association sought the identification of a Community Greenway within the Moat/Enler LLPA MCH 42. The Department agreed that the designation would have merit in that it would secure provision of the link sought by the objector. We have no reason to disagree. We consider that the Department should clearly identify the route of the Greenway, as per the recommendations on policy OS 2 in part 1 of our report.

The objection also sought the designation of a new Community Greenway to run from Stoney Road to Dunlady Glen LLPA and beyond this to Carrowreagh Road. The vast majority of the proposed new Greenway as far as Dunlady Road would follow existing public roads/footpaths, with the exception of a short section of laneway at Ballyregan Avenue. From Dunlady Road to the MCH 37 LLPA, the route is proposed along a very heavily overgrown laneway to the rear of Dundonald High School. The objector stated that the Greenway might then extend along the rear of the industrial buildings at Carrowreagh Business Park to Carrowreagh Road.

The Plan states that the purpose of Community Greenways is to “seek to re-establish corridor links between the countryside and urban areas of open space such as parks, playing fields, and natural areas to create a network of urban open spaces”. MCH 37 is a linear feature, described in the Plan as a steep stream corridor and glen that separates high density residential development from institutional/industrial land. Much of the LLPA lies inside the SDL, and exhibits little in the way of amenity, landscape or nature conservation value. We see little to be gained in attempting to provide a formal connection between this LLPA and other urban green spaces that are a considerable distance away.

Greenways are clearly not intended as a means to extend the footpath/cyclepath network, per se. We have difficulty in identifying how the proposed Greenway would serve any significant purpose, other than in providing an additional length of footway through overgrown laneways to a residential area that is already accessible via existing roads and footpaths. It would provide only the most convoluted of links between LLPA MCH 37 and the BT 162/07 Greenway at Stormont since much of it would wind through residential streets or use existing roads and footpaths, which are not traffic-free. With regard to the housing at Carrowreagh Road, it is not the function of a Greenway to link housing and open space. We see no indication in the Plan that the purpose of a Community Greenway should be to permit travel around, rather than through, the urban area. We do not consider that the Greenway Designation would provide any benefit in terms of promoting wildlife corridors, nor is the likely low cost of its maintenance a factor that would outweigh our conclusions. We recommend no change to the Plan as a result of this part of the objection.
A Community Greenway has been considered along the route of the EWAY in connection with objections to the EWAY proposal.

**Recommendation:**

We recommend that a Community Greenway is clearly identified and designated within LLPA MCH 42.
EDUCATION, HEALTH AND COMMUNITY FACILITIES

MCH 46/01 Health Use: Lands at Forster Green, Upper Knockbreda Road

Objection 699/48

CBC requested that the Health Use designation should be worded to include both healthcare and community facilities so as to provide a ‘one stop shop’. Other community facilities could be meeting rooms and a hall and the Council understands that a Citizens Advice Bureau is in discussion with the Trust regarding accommodation within the site. We note that the amplification text refers to the provision of a Community Care and Treatment Centre for South and East HSS Trust. As the site has now been developed we need not consider the objection any further.

Objections to no reference to Cemetery Provision at Millmount

Objection 699/52

CBC requested that the plan makes reference to its new cemetery provision at Greengraves Road, Millmount. We consider that if planning permission has been granted, it should be identified.

Recommendation

We recommend that if planning permission has been granted for a proposed cemetery at Millmount, its location should be identified.

Objections to no reference to Community Facilities.

Objection 699/49

This objection from CBC states that whilst the plan makes reference to a new community facility for the Four Winds area and that a site has been identified at Manse Road (objection site), this is not shown on Map no 2a. We see no need for it to be identified on map 2a. Accordingly, we recommend no change to the plan.

Objections seeking other Zonings

Objection 699/55

CBC requests that the Hydebank Playing Fields are designated as a DOS. They state that this facility has been declared as surplus to requirements by the Council. It is proposed to replace the facility at the former Boys Brigade Playing fields in the adjacent Belvoir Area. It is also requested that the Hydebank Playing Fields are deleted as an area of open space as it has development potential for a number of uses. We do not consider that this is an appropriate location for a DOS, as no land use was identified and the lands are not vacant or underutilised land nor have they any role to play in urban regeneration. Accordingly, we recommend no change to the Plan.
CASTLEREAGH TOWNS

CARRYDUFF

Objections to Designation CF 01: Settlement Development Limit

Objection 2036/1/2

Elevate submitted objections to the restrictive nature of the Carryduff Development Limit and Protected routes. However these objections are of a general nature and no specific lands or arguments were presented that would enable our further consideration of the matter.

HOUSING

Lands to the east of Saintfield Road

Objection 2195

We note that the Department in its August 2007 evidence considered this site suitable for development. The size of this objection site was substantially reduced at the hearing to ¼ of its original size and is now approx 6.5 hectares and includes fields contiguous with the development limit and a farm complex to the east. The objection site forms part of the extensive Carryduff Rural Landscape Wedge CR 03. We agree with the Department that the reduced objection site is difficult to see from the Saintfield Road and is not particularly prominent from Knockbracken Drive. Due to Knockbracken Drive and St Josephs Church and car park to the north (which are not included within the settlement limit) and established residential development to the west and south, we consider that the reduced objection site sits in well within the urban form and presents a logical extension to the settlement limit. We agree with the Department that the function of the RLW would not be prejudiced if the site was developed and included within the development limit, as at present the RLW is read from beyond the Church and car park northwards. Its inclusion would not bring development any closer to the boundary at Castlereagh. Notwithstanding the fact that development would encroach into the RLW we do not consider that it would undermine this designation.

We accept that the two most southerly fields are more elevated and prominent than the rest of the objection site and we note that the objector has proposed they are to be maintained free of development and form part of designated open space. This could be secured by a KSR. We consider that the site is suitable for housing. It is not needed to meet the HGI, however, and in view of our conclusions in Part 1 of our report, we recommend that it is held in a short term land reserve and only released if required.

Road Service raised concerns about the capacity of the road network to cater for the proposal. In view of the Departments assessment of the site as an A1, they must have been satisfied that roads issues are not of paramount concern.
Recommendation

We recommend that objection site 2195 as shown on Plan 10 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 of the site should be subject to the following KSR:

- The two fields to the south of the site (as shown hatched) shall be kept free of all types of built development and shall be positively planned for and incorporated within any future residential development scheme as an area of open space.

Objection 2745

This objection seeks lands to east of Saintfield Road and north of Carryduff to be included within the development limit. However this portion of land is physically divorced from the development limit and it would be illogical to include it within the settlement. We recommend no change to the Plan.

Lands to the west of Cadger Road

Objections 760, 761, 3700

Objection 3700

We note that the Department in the June Paper considered this site suitable for development. We consider that this approx 9 hectare site sits well into the urban form as it is defined to its western and southern side by the development limit. The extensive CF 04/01 housing zoning sits to the west. The rural Cadger Road to eastern boundary of the objection site and a laneway defined with mature vegetation provides enclosure to the remaining sides of this objection site. Overall the objection site extends the urban form to a logical boundary. The site is relatively flat and does not read as prominent from surrounding areas. We recommend that site 3700 is suitable for housing. The site is not needed to meet the HGI, however, and in view of our conclusions in Part 1 of our report, we recommend that it is held in a short term land reserve and only released if required.

In view of our conclusions for zoning CF 08 we consider that access need not only be from CF 04/01. The eastern boundary treatment can be considered as part of the development management process.

Recommendation

We recommend that objection site 3700 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.

Objection 760

This objection site lies to the west of Cadger Road north of objection site 3700. It is bounded to the west by the large housing zoning CF 04/01. The northern and southern
boundaries are defined by field boundaries. The southern boundary of the objection site is irregular and jagged in form wrapping around a number of fields to the south. The objection site consists of a number of fields with groups of trees and is generally flat with buildings in the centre. Individually, we do not consider that this site would lie into the urban form as it would take the form of a protrusion of development out to the east of the development limit into the open countryside. Individually and in combination with objection site 761 we consider this site to be unacceptable. We consider that in combination with 3700 and 761 or in combination with 3700, a satisfactory extension to the settlement could be provided but such a scale of development is not required to meet the housing needs of Carryduff. Accordingly, we recommend no change to the Plan.

Objection 761

This site lies at the junction of Manse Road and Cadger Road, north of objection sites 760 and 3700. It consists of 4 fields and a farmhouse and outbuildings. The lands are generally level and not prominent. Field boundaries are mainly low mature hedgerows. Similar to our analysis for objection site 760, we do not consider that inclusion of the objection site would individually constitute a logical urban form. Although it abuts the development limit on its western side development on the objection site would extend out along Manse Road forming an unacceptable irregular protrusion of development into the open countryside. Individually and in combination with objection site 760 we consider this objection site to be unacceptable. We consider that in combination with 760 and 3700 a satisfactory extension to the development limit could be provided but such a scale of development is not required to meet the housing needs of Carryduff. Accordingly, we recommend no change to the Plan.

Lands to the south of Mealough Road

Objection site 2529

Objection 2529 is an extensive site of 78 hectares to the western side of Carryduff extending westwards from zoning CF04/02 including all land lying between Mealough Road and Hillsborough Road. It also includes the entirety of LLPA CF 15. We consider that inclusion of this large site within the development limit for housing would lead to excessive growth in one direction on a prominent site resulting in excessive and unacceptable urban sprawl across the open countryside. We agree with the Department that a site of this excessive size is not required to meet the housing needs of Carryduff. We recommend no change to the plan as a result of this objection. Although the Department considered that a small portion of objection site 2529, between sites 35 and 3406 would be acceptable, that is not the objection site before us. Our consideration relates to the entirety of the objection site as submitted.

Objection 35

It was argued that this small 2.12 hectare objection site was essentially an extension of zoning CF 04/02 which could be accessed from the zoned land and would have the same visual impact from the Saintfield Road as land zoned to the east. It is defined to the east and south by zoning CF04/02 and to the west by the curtilage of no. 6 Mealough Road.
We consider that the north west boundary of CF 04/02 abutting the objection site provides a strong boundary to the zoning and the development limit is defined on the ground by existing mature trees. The western boundary of the objection site would present an irregular edge following the sweeping driveway around the rear curtilage of no 6 and then onto field boundaries to the south west. Land rises steeply from the road in a southerly direction to a plateau and although we agree with the objector that the topography of the objection site is similar to that of the adjacent zoning, we consider that any development thereon would extend development along the road on this prominent swathe of land south of Mealough Road. Although the Department considered this site to be suitable for development we do not agree. We agree with the counter objectors that development on this site would encroach further into the open countryside and would be prominent with no well defined limit. We recommend no change to the Plan as a result of this objection.

Objection 3406

3406 is a freestanding objection site which only abuts the development limit on its southern side. Its inclusion would leave a large gap site between its eastern boundary and the development limit boundary which we consider to be illogical. As a freestanding site it is too far removed from the existing urban form to be considered an acceptable extension to the town.

We agree with the counter objectors that any development on this prominent site would be highly visible from the Mealough and Saintfield Roads and would unacceptably encroach into the open countryside and further encourage sprawl along Mealough Road. This would also be our position taking into consideration the larger site including 35, part of 2529 and 3406. We recommend no change to the plan as a result of this objection.

Objection 1378

Objection site 1378 is a large site to the south of Mealough Road. The objection seeks the inclusion of the southern part for housing - a portion of which overlaps with the LLPA - and the consequent reduction of the LLPA CF 15. LLPA CF 15 consists of a significant localised raised landform with a farmhouse and outbuildings with mature tree planting on the hill and mature field boundaries which add to the rural setting and landscape amenity of the area. We agree with the Department that the lands should remain within the LLPA as they contribute to the intrinsic environmental value and character of the area and recommend no change to LLPA CF 15.

We consider that any development on any part of this the LLPA will impact on the landscape and visual merit of this raised landform and will have an adverse impact on the views and setting of the farmhouse. Development would be prominent and therefore is not acceptable.

The remainder of the objection site south of the LLPA, is bounded to the south and east by housing zoning CF 04/02 and to the west by a watercourse. This part of the site which is set back from the Mealough Road is in a valley shielded from views. Although well enclosed, inclusion of this part of the site within the development limit would extend development onto the open countryside to the north west of Carryduff. It would also
impact on the LLPA bringing development right to its edge. On balance, this part of the site may have been considered acceptable but it is not our preferred site for development in view of the limited number of dwellings required to meet the future needs of Carryduff. Accordingly, we recommend no change to the Plan.

**Lands to the south of Comber Road**

**Objection 225**

This 7.95 hectare site is defined to the north by existing industrial use which is within an area zoned as an area of existing employment.

The topography of the site slopes gently away from the road and runs up to the ridgeline behind industrial buildings on the Comber Road. We agree with the counter objectors that this prominent ridge line to the north east of the site is highly visible on approach from the Comber Road. Although the objector has proposed development only below the 125 m contour line we consider that the objection site reads clearly as part of the open countryside beyond the built environment of the town and any development on it would adversely affect the setting of Carryduff. Although the Department considered that the site will not lead to excessive growth in one direction and the site could be considered as rounding off, we disagree. We consider the site to play an important role in the setting of the town on approach from the south on the Saintfield Road. The site is also relatively remote from housing areas being separated by a major road. Overall we consider the objection site unsuitable for development. We are not persuaded that the site should be rejected on the basis of access. We recommend no change to the plan as a result of this objection.

**Lands between Saintfield Road and Ballynahinch Road**

**Objections 2636 and 1744**

We note in that the Department in their August 2007 evidence considered objection site 2636 suitable for development. This 3.71 hectare site lies between the Carryduff River and the Killynure Road and wraps around the southern tip of housing zoning CF 05/05. The site falls away from the Killynure Road and development on it would not appear prominent and its boundaries are defined on the ground with existing vegetation and the Carryduff River.

However approx half of the site lies within the LLPA CF 20 and the site is defined to its western side by the Carryduff River. The Department’s assessment did not make any reference to the LLPA. They stated that part of the site was considered unsuitable due to drainage issues.

Objection 2636 was also to the LLPA – CF 20 which covers approx half of the site and to SLNCI CR02/04 – Killynure Road which is outside the objection site. The objection did not explain why the LLPA is of concern and only stated that any features could be protected through the development management process. Neither did the objection
explain how the SLNCI was of concern only that it would prejudice farming operations. Therefore these designations are confirmed.

Although an LLPA designation does not preclude development, we would not consider the presence of an LLPA to be suitable for a major housing zoning. In addition it is obvious that part of the site is within the Carryduff River floodplain. As we have concluded that the portion of the site covered by the LLPA is not suitable for development this leaves approx half of the site immediately to the west of Killynure Road. We consider that this portion of the site does not sit well into the urban form and if built on would form an illogical protrusion of built development into the open countryside and therefore find it unsuitable for development.

These conclusions also apply to part of objection 1744 which is encompassed by 2636. The remainder of objection site 1744 stretches along both sides of the Killynure Road which is open with distant views obtainable. We agree with the Department that any development on it would disproportionately extend the settlement limit significantly in a south easterly direction along the Killynure Road and is therefore unacceptable. Accordingly, we recommend no change to the Plan.

Objections 581, 3412, 3057, 405

Essentially objection sites 581 and 3412 are the same. The original objection site was reduced at the Inquiry.

This objection seeks to provide significant planned expansion of Carryduff to the south east of the town. Proposals involve a new road scheme to the south of Carryduff taking the form of a 2 lane carriageway linking Ballynahinch Road (A 24) to the Saintfield Road (A 7) from where it will be upgraded to a 4 lane carriageway to connect to the existing 4 lane road at the Carryduff Roundabout. The objector stated that the proposed road scheme would provide 2 functions: to provide access to housing and to remove the north-south traffic from Carryduff town centre by diverting traffic between the Ballynahinch Road and the Saintfield Roads thereby facilitating regeneration of the town centre. In addition the objector has offered a contribution of £6 million to BMTP-promoted infrastructure such as the Saintfield Road Relief Road or other projects at the discretion of Roads Service having the beneficial effect of easing traffic flows from the Carryduff direction.

The lands enclosed by the proposed road will accommodate development of approx 35 hectares providing approx 875 - 1000 dwellings clear of the floodplain and excluding CF05/05. It also includes public open space of approx 18 hectares on the Carryduff River corridor and floodplain which becomes part of a sustainable flood management and drainage design, positively managed for habitat enhancement as well as visual amenity creating a substantial area of informal open space and providing focus for existing and new housing as well as a community woodland and intensive planting proposals. The proposed road will become the new development limit.

Use of the new road by non local traffic will be promoted by the application of traffic calming measures along the downgraded town stretch of the Ballynahinch Road from the link road northwards via the town centre to the roundabout. Church Road is to be stopped up at the Saintfield /Comber Road junction. The objectors claim that transfer of
the traffic to the throughpass will provide relief to the town centre from problems of traffic congestion, community severance and will facilitate regeneration and environmental town centre improvements.

Notwithstanding Carryduff’s potential for planned expansion, the scale of the objection site is such that it would provide far in excess of the 500 dwellings identified to meet Carryduff’s housing needs.

The objector’s case was that the benefits of the proposed road, town centre improvements and provisions of public open space would outweigh concerns over the size of the objection site. These must demonstrate compelling strategic benefits to Carryduff to set aside these concerns.

We would assess the objector’s case as follows:

- The Northern Ireland Landscape Character Assessment states that ‘the principal opportunities for further development lie to the south east of the town where there is an extensive valley….‘. Whilst we would agree with the Department that to the south east is the direction for future growth it does not mean that this is the only site and does not preclude opportunities for growth in other directions. The Character Assessment fails to recognise the constraint of the floodplain of the river. We note that the Department has carried out a detailed analysis of extending the limit south and has identified housing zonings CF 05/03 and CF 05/05. Any encroachment further south is constrained by the presence of the extensive LLPA CF20 and the floodplain of the Carryduff River.

- There was no persuasive evidence of any traffic problems with the existing roads network. The proposed new road, while providing a route around Carryduff is therefore unnecessary.

- The objector drew parallels for the proposed road around Carryduff with the Ballyclare Relief road. The proposed road is not comparable with the Ballyclare Relief Road which is necessary to deliver further housing in Ballyclare. We note that whilst the BMTP makes reference to the Ballyclare Relief Road it does not refer to any road proposals in relation to Carryduff. The Department considered the two to be distinguishable in that development in Ballyclare relies on the delivery of the relief road whereas proposals for sites in Carryduff can be provided without any new highway scheme being necessary. The Saintfield Road Relief Road is to be publicly funded and will therefore be provided irrespective of the objector’s contribution of £6 million.

- There are major questions regarding the closing of Church Road and the downgrading of Ballynahinch Road and how these would be implemented.

- There is no regeneration scheme put forward for Carryduff Town Centre and there have been no discussions with DSD. Carryduff functions as a commuter settlement to Belfast and we consider that the Town Centre problems experienced go beyond the roads infrastructure. There is no guarantee that the removal of traffic from the Town centre would improve its performance or its physical fabric.
In the absence of any regeneration proposals we are not persuaded that the envisaged regeneration benefits would be realised at all. They are dependant on others to initiate.

- Public open space can be provided outside the development limit and is not dependant on the success of the objection site. The benefits of the public open space proposed are questionable in the absence of support from Castlereagh Borough Council which is the statutory provider of open space.

We are not persuaded that the above factors outweigh our conclusions on the strategic growth required to meet the needs of Carryduff and conclude the excessive growth proposed cannot be justified. Accordingly, we recommend no change to the Plan.

Individually objection sites 405 and 3057 (which objectors seek as a DOS for residential) are physically divorced from the south eastern side of the development limit and therefore it would not be logical to include them within the development limit for housing. The sites are not in an appropriate location for a DOS. We recommend no change to the Plan.

**Lands at Hillsborough Road**

**Objections 418 and 3396**

The objection site consists of 2 portions of land to either side of the Hillsborough Road each rising away from the road - the northern portion being 3.49 hectares and the southern being 7.21 hectares.

Land to the north rises from the Hillsborough Road to the north west and is clearly visible from both western and eastern approaches along the Hillsborough Road. The potential limit would be defined by a mature hedgerow to the west. Development on this part of the objection site would appear prominent. Land on the larger southern portion of the objection site also rises from the Hillsborough Road to the Moss Road to the south and a crest to the south east. Although the potential limit would be defined by the Moss Road, it is also clearly visible from both western and eastern approaches on the Hillsborough Road. Any development on this portion of land would be particularly prominent especially when approaching from the east due to the long sweeping bend in the road. This objection site spanning across both sides of the Hillsborough Road would read as a significant protrusion in the urban form on elevated ground along Carryduff’s western limit. We consider that the prominent and open nature of this objection site would constitute urban sprawl along both sides of the Hillsborough Road and therefore we disagree with the Department that this site is suitable for development. We recommend no change to the Plan.
Objections to Housing Zonings

Zonings CF 03/03: 648 Saintfield Road, CF 04/01: Baronscourt & CF 04/02: Mealough Road

Objections 3187, 3417, 3414 & 3422

The objector sought amendments to or deletion of the KSRs. The Department conceded that all the objection sites have Planning Permission subject to conditions. Therefore we agree with the Department that in light of these permissions the conditions are considered sufficient to allow a satisfactory form of development and the KSRs are no longer necessary. We note that construction has started on CF 03/03.

Recommendation

We recommend that the KSRs for the above zonings are deleted.

Zoning CF 05/01: Lands east of Edgar Avenue, Saintfield Road

Objection 2789/1

This objection sought the minor amendment of the southern boundary of CF 05/01 which is currently formed by the former location of the now culverted Carryduff River. The objector seeks the new culvert line to form the boundary and we consider this to be a logical approach. The objector also seeks some neighbourhood facilities including retail to be zoned on the site. We do not consider there be any need to include a zoning for neighbourhood facilities including retail as the site is in very close proximity to Carryduff Town Centre.

Recommendation

We recommend that the site boundary of Zoning CF05/01 is extended as shown in the objection.

Objections seeking KSRs for social housing

Objection 699/11, 12, 13

Castlereagh Borough Council sought the inclusion of key site requirements for social housing on sites CF 05/03 and CF 05/05. In view of our recommendations in Part 1 of our report, we consider that these sites should make a contribution to social housing needs and that the Department should determine the level of social housing appropriate.

Recommendation

We recommend that these sites include a social housing element, the extent of which is to be determined by the Department.
Objections seeking additional housing zonings

Objection 2806

This relates to a small portion of land at 28 Ballynahinch Road and seeks its zoning for housing. The site is within the settlement limit and is already in a housing use and therefore we do not consider it necessary to be zoned. Accordingly, we recommend no change to the Plan.
EMPLOYMENT

Employment Zonings

CF 07 Ballynahinch Road

Objections 899, 2019/9, 3467, 1103

Objection 1103 sought the zoning of this employment land as housing. Objection site 2019 constitutes an area of 5.76 hectares and is the northern portion of zoned land CF 07 and the objector seeks its rezoning for housing land as an extension to housing zoning CF 05/04.

At the Inquiry, the Department conceded to the rationalisation to the northern and eastern boundary of CF 07 by the rezoning of 2 small square offshoot portions (part of objection site 2019) to housing land which would become part of CF 05/04. One portion constitutes objection site 899 - a square spur of land along the eastern edge of the zoning and the other is a rectangular portion along the northern boundary of the zoning. This would result in a more logical boundary as these portions lie more naturally within the housing areas. We agree that developing these small portions for employment use given the planting buffers required between it and the adjacent residential zoning would be difficult. We note that the KSRs for zoning CF 07 require a planting belt.

The site is located on one of the main approaches into the town. Zoning CF 07 is an accessible location on the main Belfast - Ballynahinch Road. We disagree with one of the objectors that employment use need be visually unattractive on approach as this can be controlled through the development management process.

We have noted in relation to CF 08 that the allocation of employment land to Carryduff is extremely generous in terms of both amount and distribution and to that extent some reduction in the allocation could be justified. In respect of this location, however, we consider that it offers choice to the south of the town. We also note that Invest NI confirmed their support for zoning CF 07 as it provides choice and flexibility for emerging businesses promoting inward investment and indigenous businesses. Invest NI indicated that there are 64 companies in Carryduff employing 787 people and 32 have a 3 year growth plan to create an additional 292 jobs in the Carryduff area.

Given the overall planned expansion for housing in Carryduff, we consider that any significant reduction in employment zonings could undermine the objective of supporting a balanced spatial pattern of land uses. Zoning CF 07 will support and sustain the existing community and support the proposed housing growth whilst offering a greater choice and variety in terms of site selection for potential investors and indigenous businesses throughout the plan period. The loss of the entirety of the site would undermine these objectives. We consider that the loss of the area identified in Objection 2019 would not of itself be unacceptable but there is no obvious means of access to this land. In view of our conclusion that CF 08 is suitable for re-zoning to housing, further loss of employment land would be unacceptable even if access could be provided.
We are satisfied that the objectors concerns regarding residential amenity can be protected with the KSRs. For this reason we do not agree that changes to the uses are appropriate as sought by objection 3467.

**Recommendation**

We recommend that the areas indentified in Plan 11 are brought within housing zoning CF 05/04.

**CF 08 Comber Road**

**Objections 3715, 338/2, 612/1, 699/16, 3258, 2178 and 3265**

Objection site 3715 is a portion land to the north of Comber Road zoned as employment and the objector seeks its re-zoning to housing use. CBC, objection 699/16 also seeks the exclusion of the portion of land to the north side of Comber Road from zoning CF 08.

Carryduff is identified in the RDS for significant planned expansion comprising both housing and economic development. To that end the Department has zoned extensive employment zonaings to the east of the town at Comber Road and to the west at Ballynahinch Road. These sites are in addition to existing employment areas at Saintfield Road, Ballynahinch Road, Eastbank Road and Comber Road. It is intended that Carryduff’s role will be that of a local service centre. In this context we consider that the allocation of employment land is extremely generous in terms of both amount and distribution. The loss of the objection site would still allow zoned employment land at CF 07 and the southern part of CF08. We consider such provision would be adequate to meet the needs of the town over the Plan period.

Employment land on the northern side of Comber Road is not continuous as it is interrupted by housing zoning CF 04/01 between existing and proposed employment land. The extension of CF 04/01 into this area would represent a logical extension to the housing zoning, particularly when considered in conjunction with the lands to the north (objection 3700) to which there is also an objection. We consider that the rezoning of the lands for housing would not undermine the strategic employment objectives for Carryduff and would assist in meeting the housing allocation for the town.

Objections 3258, 2178 and 3265 relate to portions of land to the south of zonings CF 08 and CF10 seeking employment/industrial use. We consider that there is no need for these sites for employment and that their inclusion would present significantly illogical protrusions of the settlement limit into the open countryside. We consider their inclusion unacceptable. We also consider objection site 3265 is not an appropriate location for a DOS.

**Recommendation**

We recommend that the northern portion of objection site 3715 is zoned for housing.
Objections seeking additional employment zonings (also Park and Ride)

Objection 3068, 3399, 699/27,127/1

The objector seeks the site as a DOS for employment and a park and ride site and its exclusion from the RLW, AOHSV, and SLNCI.

The objection sites forms part of the Carryduff Rural Landscape Wedge CR 03. We consider that development on the objection site to the western side of the Saintfield Road would be visible, would bring both settlements closer and would effectively close in the already narrow gap. This would be detrimental to the function of the wedge.

The objection site is also within the extensive Castlereagh Slopes Area of High Scenic Value - COU 06/07. The Castlereagh slopes are extremely sensitive in landscape terms as they form a backdrop to views within the BMAP area. The objection lands form the eastern side of the Purdy’s Burn valley landscape. We are satisfied that the objection site merits inclusion within the Castlereagh Slopes AOHSV due to its topography, location and landscape quality. Any development on the objection site would have an adverse impact on the landscape setting and therefore the designation.

These points also apply to objection 127 which seeks housing on the site. In regard to a housing use on the objection site we would agree with the Department that it would elongate the settlement to the north causing unacceptable urban sprawl.

We have already concluded that sufficient employment land has been included for in Carryduff. There was no specific compelling evidence submitted for employment at this site and we agree with the Department that there is enough capacity within zoned lands to meet the objectives of Castlereagh Enterprises. The Department confirmed that they will monitor the take up of the employment zonings and a plan review will regulate any deficiencies that occur.

The plan identifies 2 park and ride sites within Metropolitan Castlereagh - MCH 18/01 Cairnshill and MCH 18/02 Millmount. A Park and Ride is now operational at Cairnshill, a short distance from the objection site.

The development of other informal park and ride sites will also be pursued as opportunities arise. Given the close proximity of the Park and Ride designation at Cairnshill on this transportation corridor we consider that there is no need for a further zoning at the location proposed.

Whilst BMTP mentions the possibility of an informal park and ride at Carryduff it is not a plan proposal and a location is not identified. In the absence of any indication of a further park and ride than the provision at Cairnshill, we are not persuaded that a further site is necessary. This also applies to an objection which seeks a park and ride facility to be identified at Manse Road/Mealough Road junction - objection 699/27.

The objection sites also form part of the extensive designation MCH 32/14 Purdy’s Burn Geodiversity SLNCI. NIEA now considers that the objection lands do not merit inclusion within this designation. Accordingly, we recommend that the objections lands are removed from the SLNCI.
**Recommendation**

We recommend the removal of the objection lands from Designation 32/14 Purdy’s Burn Geodiversity SLNCI as shown on Plan 12.

**Cawoods Quarry**

**Objection 3413**

The objection lands relate to a working quarry situated outside and approximately 200 metres west of the Carryduff Settlement Limit. The site is a working quarry bounded on all sides with mature vegetation. The objectors seek an industrial zoning on the objection lands. There has been no justification presented for any zoning of these lands and we consider that sufficient lands have been identified within settlement limits to accommodate employment needs. We recommend no change to the plan.
RETAILING

Carryduff Town Centre

Designation CF 16

Objections to the Exclusion of Lands from the Town Centre

Objection 2790 and 3288

Objection 2790 identified 3 parcels of land around the town centre that were to be included. Objection 3288 related to part of the third piece of land. We agree with the Department’s approach that the parts of the site in residential use or separated by residential or other uses from the town centre should not be included. The objector accepted that this was a valid approach at the Inquiry. The other objection provided no evidence for consideration.

The Department suggested that several properties be included i.e. the Library and health centre immediately east of the shopping centre and the surgery and pharmacy south of Hillsborough Road. This was in recognition of paragraph 25 of PPS5 where cultural and social uses are to be promoted within town centres. We see no reason to disagree with this approach and recommend accordingly.

Objection 3288 also sought a DOS designation on the site. The site consists of established residential properties and is not suitable for such a designation. In any event, a large DOS has already been designated in Carryduff town centre (CF22), which we consider is sufficient. No change to the Plan is therefore warranted in this case.

Recommendation

We recommend that the Library and health centre immediately east of the shopping centre and the surgery and pharmacy south of Hillsborough Road are included within Designation CF 21 - Carryduff Town Centre.

Other Retail Objections

Objection to designation CF 10 - Carryduff Business Park

The site includes a large part of designation CF 10 and sought deletion of the designation on the site and designation as a DOS (mainly retail). We have considered the supply of employment land in our strategic employment section. This employment land is in beneficial use and there is no justification for its deletion without an alternative designation on the site.

The site is well outside the town centre and is not on a main approach to the town. We do not consider that a DOS is appropriate as the site is not vacant or under utilised land.
The objectors clarified their objection in their statement of case. The objection was aimed at meeting the retail needs of Carryduff in terms of the provision of a site for a supermarket. We do not dispute the existing and proposed growth in the population of the town. Nowhere in PPS5 does it say that a plan should identify new out of town retail sites. The plan should identify city centres, town centres, district centres and local centres in a retail hierarchy. Should there not be any suitable sites within the town centre then the suitability of edge of centre or out of centre sites to accommodate a supermarket can be assessed under extant regional policy in PPS5. The Plan should not duplicate regional policy and certainly should not circumvent the proper consideration of retail impact as part of a planning application for out of centre retailing. We therefore agree with the Department that the issues raised should properly be considered as part of the consideration of a planning application. We recommend no change to the Plan as a result of this objection.
NATURAL ENVIRONMENT

Objections seeking additional SLNCIs

Carryduff Quarry

Objection 1856

The RSPB stated that they would support the additional designation of Carryduff Quarry as a SLNCI as it regularly supports breeding Peregrine and Raven. However, we have insufficient evidence of the importance of the site to recommend its designation. We recommend no change to the Plan.
CASTLEREAGH VILLAGES

MONEYREAGH

Objections to MH 01: Settlement Development Limit

Objection 419

Objection 419 seeks the inclusion of approx 9 hectares for housing to the north west of the village and north of the Ballykeel Road. The objection site is generally undulating and falls from Ballykeel Road to a low lying area then rises gently to the north. It abuts the eastern side of the development limit and is not visually prominent although development on it would have a localised degree of visual impact from Ballykeel Road and Belfast Road. In view of our conclusions about the scale of growth appropriate to the village, we agree with the Department that development of the objection site would lead to excessive growth in one direction and cause significant urban sprawl to the north western side of the village out into the open countryside and to the west along Ballykeel Road. We consider this objection site to be out of scale relative to the size of the village and its inclusion would be contrary to the objectives of consolidation and compact village form. We recommend no change to the plan as a result of this objection.

Objection 3391

Objection site 3391 is approx 2 hectares and lies to the north of Ballykeel Road and directly abuts Keel Park to its eastern side. It comprises of gently undulating large fields with reasonably well vegetated boundaries. Due to the set back of the objection site and roadside vegetation we consider that it is not visually prominent from the Ballykeel Road. We agree with the Department that due to its limited size it would not lead to excessive growth in one direction and we consider that development in this part of the village would represent a logical extension to the built form. The site is not required to meet the HGI, however, and in view of our conclusion in Part 1 of the report, we recommend that it is held in the short term land reserve and only released if required.

Although Roads Service indicated that the site is unacceptable we consider that there is potential for an access to the site from adjacent Keel Park.

Recommendation

We recommend that objection site 3391 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.

Objection 3152

Objection site 3152 is a very large site of 10.84 hectares abutting the south western side of the village extending from the Ballykeel Road to the north to the Hillsborough Road to the south. The land rises from the north and south to a hilltop. Development on the site would have a high degree of visual impact from both the Ballykeel and

2005/D002 78 Castlereagh
Hillsborough Roads. We agree with the Department that development on the objection site would be prominent and lead to excessive growth in one direction creating urban sprawl to the south western side of the village. The scale of development would greatly exceed what is required to meet the needs of the village. Accordingly, we recommend no change to the Plan as a result of this objection.

Objection 867

Objection 867 seeks the inclusion of approx 10.8 hectares for mixed use housing, employment uses in the form of a small business park and a site for a bus based park and ride facility and road improvements.

It is a large triangular site lying to the north of Hillsborough Road and east of Church Road. It is mainly agricultural grassland with some private dwellings and small businesses. Boundaries are a mix of hedgerows and post and wire fencing. The lack of vegetation at the junction means the site is exposed and prominent.

The objector raised an Article 31 refusal on the objection site in which the Commission concluded that development on the site would consolidate the existing village form and improve its visual aspect. This conclusion was outside the Development Plan process. We have concluded in Part 1 that 50 dwellings are necessary for Moneyreagh and development of this site would provide an excessive scale of development.

We agree with the Department that inclusion of the objection site within the development limit would lead to excessive growth, out of scale relative to the size of the Village. It cannot be regarded as a notch.

We do not consider that the provision of road improvements to provide 2 staggered junctions, a new planted out development limit and the proposals for mixed use would outweigh the overall unacceptability of the objection site in terms of growth for this village.

This objection is also to the housing zoning MH 03/02 and seeks that all of the growth allocated to Moneyreagh should be concentrated on the objection site. We note that MH 03/02 designation for housing infills a gap in road frontage development and backlands to the rear of some Church Road frontage properties. We consider that designation MH 03/02 consolidates and rounds off the urban form in a logical manner and we do not agree that it should be removed from the development limit. Even if MH 03/02 was removed, the objection site would provide excessive growth in the context of Moneyreagh. We recommend no change to the Plan as a result of this objection.

Objection 699/3 &/49

Castlereagh Borough Council objected to the Plan reference to a Community Centre within the village. At the time of the objection there was no Community Centre. As the Community Centre has been built the objection is unfounded. We recommend no change to the Plan.
**Designation MH 03/03 Housing Land Use Policy Area**

**Objection 4267/1**

This objection to Plan Amendment no 1, sought that it should be made clear for MH 03/03 that access can be taken from Hillsborough Road. We are satisfied that the Plan Amendment already makes this clear in the 2\textsuperscript{nd} bullet point.

**CASTLEREAGH SMALL SETTLEMENTS**

**General Objections to Settlement Limits of Small Settlements**

Elevate made objections to all small settlement development limits. 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. 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.

**BALLYKNOCKAN**

**Objections 3261, 367**

We consider that the inclusion of this significantly large objection site would at least triple the size of the settlement resulting in development out of scale relative to the size of the existing settlement. Development on the objection site would constitute excessive growth and sprawl out into the open countryside detrimental to the character of the settlement and the extensive LLPA. Our conclusion would not be outweighed by the many factors raised in the objection.

Notwithstanding the objectors planning gains proposals for an ‘eco settlement’ we consider that inclusion of the objection site would be contrary to the RDS objectives of consolidation and compact settlement form. We also consider that despite its location it is heavily reliant on car borne travel and can not agree with the objectors that its location is sustainable. We do not agree that Ballyknockan is distinguishable from other small settlements.

There is no reason why the locally significant Orange Hall building has to be brought within the settlement limit to ensure its vibrancy. Roads improvements would not be planning gains as these would be required for such a development. Accordingly, we recommend no change to the Plan.
CROSSNACREEVY

Objection 3173

We consider this 2 hectare site to be excessive relative to the size of the settlement, and that it neither constitutes the infilling or rounding off of development. We agree with the Department that the site is exposed on its southern boundary due to a lack of vegetation making it visually prominent on approach from Moneyreagh. This would be the case even with the objector’s landscape proposals.

The objector argued that the objection site should be removed from the LLPA, as it does not make any contribution to it. The LLPA was designated due to; the setting of Crossnacreevy; the setting of the nearby Crossnacreevy House and the setting of the adjacent stream corridor (an important landscape feature of local wildlife and nature conservation interest). We agree with the Department that the extent of the objection site should remain within the LLPA, as it contributes to the intrinsic environmental value and character of the area and protects the visual amenity and local landscape setting of the settlement. The objector also sought its identification as a Development Opportunity site. We do not consider that the site should be identified as a DOS, as it is located in the countryside. We recommend no change to the Plan.

Objection 3538

Objectors sought a reduced objection site within the development limit to the south east of School Road for small scale residential development. It lies adjacent to no 5 School Road on the road frontage and is within the LLPA, CSY 04.

The objection site is at the end of a row of roadside dwellings. We consider that development on it would break into open countryside extending ribbon development along the road, notwithstanding the mature tree and hedgerow which form the north eastern boundary. This would represent urban sprawl detrimental to the setting of the settlement and approach from the north east. Such development would therefore neither consolidate the existing settlement nor keep it compact.

We do not agree with the objector that no 7 to the north east and the dwelling opposite are read as the urban edge of Crossnacreevy. We consider that they are detached and isolated from the settlement edge which is clearly defined by the curtilage of no 5 School Road. We recommend no change to the Plan.

Objections 3709, 3712, 699/4

Objectors sought the inclusion of lands to the eastern side of the settlement stretching from the rear of existing housing along Ballygowan Road down to the Maryland Industrial Estate to the south and extending out to the east. Proposals are to provide an opportunity to extend employment opportunities and to link with housing to create a viable living and working community. Proposals are to include 100% affordable housing with a 10% social housing element. The objection site was reduced and includes 19.45 hectares of housing (with a potential yield of 384 units at a density of 20 per ha) and 13 hectares of open space parkland following the stream and the drumlin in the form of a linear park to the rear of the proposed housing with path networks to the industrial
estate. Proposals also include some service facilities. The objection encompasses objection site 3173 and 3538.

The objection site encompasses part of LLPA CSY 04 to the south of School Road.

We consider this objection site to be excessive in scale relative to the size of the settlement as it would effectively triple the size of the settlement. We agree with the Department that growth of this scale would be visually prominent from a considerable stretch of the Ballygowan Road.

The rear curtilages of existing properties along the Ballygowan Road provide a strong eastern edge to the settlement. Development on even the reduced objection site would break out into the open countryside (and the LLPA) extending development considerably to the south and the east representing urban sprawl detrimental to the setting of the settlement. We consider that the proposals would swamp the existing defined limits which were drawn to consolidate the existing settlement form and prevent further development along the 3 main roads. Although LLPAs do not prevent development, proposals have to be sensitive to the attributes of the LLPA. We consider that such a large swathe of built development effectively subsuming the LLPA would adversely affect the features that contribute to its character and the setting of Crossnacreevy notwithstanding the proposals for landscape management.

Irrespective of the wide range of planning gains advanced we consider that development of this scale would run counter to the Plan’s strategic objectives in relation to small settlements.

We note the Department indicated that Crossnacreevy was not an area of social housing need confirmed by the NIHE who state that it is too remote from neighbouring settlements to have any real overspill use. We recommend no change to the Plan.

**RYAN PARK**

**Objection 3425**

Objectors sought the inclusion of a reduced site to the eastern side of the development limit approx half the size of the original site which was 1.85 hectares. It consists of 3 dwellings - numbers 115, 117 and 119 Ballygowan Road fronting the road with large gardens. Roselawn Cemetery lies directly to the east. The reduced objection site lies outside the LLPA - CSY 03.

Ryan Park consists of a small rural housing estate with access from the Ballygowan Road. The properties from 115-119, although adjacent to the built form, do not read as part of the settlement as they represent road frontage development. We do not consider them to have a strong visual relationship with the settlement to justify inclusion. Notwithstanding the Departments concession, we consider that development of this size would extend built development out to the east along Ballygowan Road and constitute ribbon development and excessive growth in one direction out of scale with the settlement as a whole. We do not consider that inclusion of this reduced objection site would constitute consolidation of the existing settlement or keep it compact. Accordingly, we recommend no change to the Plan.
SUGGESTED NEW SMALL SETTLEMENTS

Loughview

Objection 245, 699/ 34 & 699/44

We have already agreed a small settlement at Loughview in Part1 of our report. We shall now consider the extent of the small settlement. The Department identified a much reduced settlement limit than sought omitting large open swathes of land to the west and concentrating the settlement limit to the western side of Church Road only. This was generally agreed by the objector with the exception of a small gap site between the row of dwellings to the north of the Castlereagh Church and government offices. We note that an extension to the most northern dwelling of the row already extends into the reduced objection site along with an extended curtilage leaving approx half of the gap. Given that development now encroaches into the gap which sits within a string of roadside development within the limit, we consider that inclusion of this small infill site would constitute a logical rounding off of the settlement limit.

The Council requests an LLPA and Area of Village Character be designated at Loughview. The suggested AVC includes Castlereagh Presbyterian Church and associated buildings and lands around Church Road/Manse Road that contribute to the setting of the historic church. Whilst we agree that the Church and setting are very attractive features; policy does not extend to allow AVC designations in the small settlements. In any case, as the Church is listed it is already afforded statutory protection. The proposed LLPA is to include the area around Castlereagh Presbyterian Church and the associated buildings and lands around Church Road/Manse Road that contribute to the setting of the historic church. The precise boundaries of the objection site were not specified and we are unable to give further consideration to this objection. We recommend no change to the Plan.

Recommendation

We recommend that the boundary of Loughview is as shown on Plan 13.

Gransha

Objection 3022

Part 1 of this report addressed the proposed new settlement at Gransha. The objection lands include La Mon House Hotel complex, a small number of properties, Gransha Presbyterian Church, Church Hall and car park and large swathes of open fields. We agree that the concentration of buildings around the Church provides a sense of cohesion. The objection, however, seeks the inclusion of extensive lands beyond the grouping of buildings. The undeveloped land however is on rising open ground and any development thereon would be prominent. Given the aim of the plan to consolidate development within small settlements and our view that only small scale expansion is envisaged, the extensive encroachment into the open countryside is unacceptable. We consider, however, that the concentration of development around the Church on a much reduced area justifies designation. It will be for the Department to define the settlement limit in the adopted plan.
Recommendation

We recommend that the Department defines the settlement limit for Gransha in accordance with our views as set out above.
CASTLEREAGH COUNTRYSIDE

Employment

CR 01: Maryland Industrial Estate - Crossnacreevy

Objections 3253, 3255, 3439, 699/4

Objections sought inclusion of additional lands to the north and south of the designation. Carryduff is more sustainable than Crossnacreevy due to infrastructure and more appropriate for growth during the plan period. In terms of employment land Carryduff (4.5 miles away) provides a number of employment zonings both existing and proposed CF 07 - CF 13. There are also a number of other zoned employment sites in Castlereagh MCH 07 Purdysburn and MCH 08 Millmount, both of which are extensive. Given the proximity to these, there are sufficient opportunities to meet the industrial needs and economic growth within the sector.

We note however that the Department have indicated that they are committed to regular monitoring of the take up of land throughout the plan period and will evaluate any deficiencies that occur in the proposed Plan Review.

The objections lands to the north extend as far as the extensive LLPA CSY 04. We agree with the Department that extension of the zoning to the north would result in sprawl and encroachment into the open countryside which would have a significant visual impact from the Ballygowan Road. Planting proposals would not mitigate this. There is a distinct visual separation from the settlement of Crossnacreevy due to topography, vegetation and distance and the expansion of Maryland would significantly encroach into this. Similarly, expansion to the south would extend industrial development down to the Gransha Road across open countryside and have a significant detrimental impact from both the Ballygowan Road and the Gransha Road. Access improvements do not justify inclusion of the objections lands and extensions of this zoning. A DOS is not appropriate in the countryside. We recommend no change to the plan.

Rural Landscape Wedge Designations

CR 05 Newtownards and CR 06 Comber

Objections 468/12/13, 521/4/5, 886/2/3, 3158/2/3 and 1466 (already covered)

DGBA sought that CR 05 and CR 06 should be joined and extended north to form a continuous wedge running along the full length of Dundonald Eastern border. This would provide a simpler more comprehensive approach as the land in-between is of the same landscape value and the gap could not be exploited. DGBA considered the current wedges to be inadequate.

The RDS refers to the need to keep buffer landscape wedges at the edge of the main urban component areas to distinguish and maintain amongst other areas the identities
of settlements. The NI Character Assessment identified 2 buffer zones separating development.

The designated CR 05 Newtownards RLW functions to distinguish and maintain the identity of Dundonald, to define and protect the setting of Dundonald and Newtownards to the west of the Metropolitan Area so that their respective identities are preserved and to maintain the rural character of the countryside. Similarly CR 06 Comber RLW functions to distinguish and maintain the identity of Dundonald, to define and protect the setting of Dundonald and Comber to the south east of the Metropolitan Area so that their respective identities are preserved and enhanced and to maintain the rural character of the countryside.

We have concluded in relation to lands at Greengraves Road, that part of the CR05 Newtownards Wedge which was within objection site can be removed from the most southern part of the RLW. This portion is set back from the Newtownards Road and would not prejudice the strategic functions of this Rural Landscape Wedge

Whilst we agree with the objectors and the Department that the landscape quality of the designated wedges and areas in between are the same, we agree with the Department that as the 2 RLWs are located around the roads it would therefore follow that the perception of the buffers is most prominent when viewed from the roads and the aim would be to protect the 2 routes maintaining visual separation. Given this and our conclusions in respect of the reduction of the CR 05 wedge we consider it unnecessary to join up both RLWs. We are unable to make any recommendations of the extension of the wedge to the north as this is outside the BMAP area into the Ards and Down Plan area. Accordingly, we recommend no change.

**Objection to Inclusion of lands in AOHSV Castlereagh Slopes (COU 6/07)**

**Objections 906/12, 2799**

The original objection from EHSSB sought a reduction in the extent of the AOHSV at Belvoir Park Hospital. Subsequent evidence sought the inclusion of the site within housing zoning MCH 05/08. As the evidence seeking housing goes beyond the scope of the original objection we are unable to consider this. The objection lands relates to a triangle to the west of zoning MCH 05/08. It is included in the extensive Castlereagh Slopes AOHSV.

We note that the Department stated that this triangle site slopes down from the 60 m contour to 20 m at Ballylesson Gate and there is a line of trees at the 30 m contour line (outside the western settlement limit) which could contain development - however this is not before us to consider. We consider that the objection site forms an intrinsic part of the AOHSV due to its landscape quality, topography and location and disagree with the views expressed by NIEA in respect of lands within the 30m contour. These lands are important to the setting of the urban area and function as a backdrop. Accordingly, we recommend no change to the plan.
Objections to extend Areas of High Scenic Value - COU 6

Objection 886/13

EVGBA sought the extension of designation COU 6/08 - Castlereagh Escarpment out along the Enler Valley to give added protection from development pressures. However in the absence of a boundary to indicate this extended area we are unable to consider this objection any further. Accordingly, we recommend no change to the Plan.
# APPENDIX 1

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<tr>
<th>Plan</th>
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Additional Objections - Castlereagh District

Objection 3909/2
Objection number added to list under MCH 07.

Objection 3861/4
Objection number added to list under MCH 30.

Zoning MCH 03/12; Lands at Millmount, Quarry Corner and Carrowreagh Road
(Inserted at page 22)

Objection 3909/1, 3932/1

CBC sought the identification of additional lands to compensate for the EWAY land take shown in Plan Amendment no 1 (map 18) which reduces the zoning from 91.60 hectares to 86.45 hectares. We assume that the Department has allowed for this land take in their original assessment of the output of the zoning. In any case we refer to our conclusions reached for housing zoning MCH 05/09: Land at Stoney Road, Dundonald, where we concluded that the Department’s estimated output on the Millmount zoning was an under estimate of its actual potential.

Objection 3932/1 also objected to this reduction in the land available for housing and sought a higher output. We have already recommended the deletion of the KSR’s in view of the evidence that planning permission has been granted. This does not preclude a higher figure coming forward than the 1080 indicated in the Plan Amendment which we have already indicated is too low an output for sustainability reasons. We disagree that there is a need to identify any more land. Accordingly, we recommend no change to the Plan as a result of these objections.

Objection 4219/2
Objection number added to list under MCH 30 & MCH 31.

Designation MH 03/03 Housing Land Use Policy Area
(Inserted at page 80)

Objection 4267/1

This objection to Plan Amendment no 1, sought that it should be made clear for MH 03/03 that access can be taken from Hillsborough Road. We are satisfied that the Plan Amendment already makes this clear in the 2nd bullet point.