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

REPORT ON LAGAN VALLEY REGIONAL PARK

by

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

Date of Report: 26th September 2011
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APPROACH TO KEY SITE REQUIREMENTS

The purpose of this section is to set out our general approach to the matter of key site requirements attached to zonings. We consider that many of the key site requirements specified in the plan are not in accordance with the guidance set out in paragraph 39 of PPS1. The guidance states that development plans should set out the main planning requirements. It is clear that this is intended to address such matters as constraints to be overcome and specific issues in relation to the site. They should not read like universal informatives 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.
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

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

Following the Department’s publication of the final version of PPS21, all proposed Green Belt designations in the Plan were withdrawn. We have not therefore considered objections submitted in respect of Green Belt designations or policies.

We will only provide plans identifying sites where a site was amended after the original objection was submitted.
List of Abbreviations

AOCMD  Area(s) of Constraint on Minerals Development
AOHSV  Area(s) of High Scenic Value
ATC    Area of Townscape Character
BCC    Belfast City Council
BUAP   Belfast Urban Area Plan
CBC    Castlereagh Borough Council
DOS    Development Opportunity Site
HGI    Housing Growth Indicator
LLPA   Local Landscape Policy Area
LCC    Lisburn City Council
LUPA   Land Use Policy Area
LVRP   Lagan Valley Regional Park
LVRPAC Lagan Valley Regional Park Advisory Committee
PPS    Planning Policy Statement
PSRNI  A Planning Strategy for Rural Northern Ireland
RDS    Regional Development Strategy
RLW    Rural Landscape Wedge
RSPB   Royal Society for the Protection of Birds
SDL    Settlement Development Limit
SLNCI  Site of Local Nature Conservation Importance
STLR   Short Term Land Reserve
TS     Technical Supplement
ULW    Urban Landscape Wedge
GENERAL MATTERS

We concluded in Part 1 of our report that all the policies and proposals related to Lagan Valley Regional Park in the Plan should be contained in one volume. We have therefore decided to address all site-specific objections within Lagan Valley Regional Park or seeking that additional land is included within the Park in this volume of our report. We would suggest to the Department that all the nodes are numbered as per the Belfast volume of the Plan i.e. LVRP1, etc. Care should be taken to ensure consistency between the maps and text e.g. Designations CR08 and CR09 are referred to as LVN03 and LVN 04 in the Castlereagh Map Booklet. We have divided this report into the portions of the Park within each District for the ease of reference of the Department and objectors because this is the format utilised in the Plan as published. This format in the Plan has led to some unexplained anomalies. For example, there is a Lagan Valley Regional Park Strategy in the Belfast Volume that does not appear in the other volumes of the Plan.

We have several general comments to make on Lagan Valley Regional Park Node Designations. The objections regarding these matters were referred to us as site-specific objections and hence we are dealing with them in this report. We have commented in Part 1 of our report as to the acceptable uses within nodes in the context of objections to Policy COU 14. We concluded that it would not be appropriate to determine acceptable uses in nodes as part of the development management process. LVRPAC considered that the acceptable uses for each node were unclear in the Plan. We agree that one has to examine various explanatory texts and other locations to discover what uses are considered acceptable in the nodes. The acceptable uses should be listed as the first key site requirement for each node. This is the case with several other designations in the Plan. The acceptable uses would presumably then cover changes of use as well as new build development. We have commented on exceptional circumstances in Part 1 of our report.

Several objections related to the basis for the identification of nodes. The objectors are quite right in that there is no explanation in the Plan of the basis for identification of nodes. We can only assume that there must be some logic in identifying existing facilities and attempting to provide an even spread of nodes through the Park. We shall therefore take these issues into account in the consideration of related objections.

Recommendation

We recommend that the acceptable uses for each node are included as the first key site requirement for the node and that the nodes are referenced using a single numbering system for the Park.

LVRPAC objection to Various SLNCI Designations in Several Districts
(Objection 2334)

The LVRPAC objected to the following SLNCI Designations: Floodplain around Eel Weir (CA 01/06), Edenderry to Giant’s Ring (EY 02), Sir Thomas and Lady Dixon Park (CA 01/07), Belvoir (MCH 32/03) and Lagan Meadows (BT 102/20). These designations are across all three districts and so we address them here at the outset. The basis of the objection was that the designations could prevent re-opening of the Lagan navigation.
The first point to make is that development within SLNCI designations is not precluded provided there is no significant adverse effect on their nature conservation interest. One of the primary aims for LVRP is to preserve or where possible enhance the natural or man-made heritage of the Park (Lagan Valley Regional Park Strategy: page 337 of Belfast Volume). The Plan also expresses some support for the re-opening of the Lagan navigation. For example, the Belfast Volume refers to it at page 339 under LVRP1 and the Lisburn Volume states on page 312 that “No development will be permitted that would prejudice the future re-opening of the Lagan Navigation”. Appropriate development to re-instate the Lagan navigation would be assessed as part of the development management process. We see no need to remove the river or canal from any of these designations for the reasons given by the LVRPAC, which did not challenge the nature conservation value of the proposed designations. We have also addressed the issues of policies for the river and canal in Part 1 of our report. We therefore recommend no change to the Plan as a result of this objection.

BELFAST

OBJECTIONS TO LAGAN VALLEY REGIONAL PARK NODE DESIGNATIONS

LVRP1 – Lockview Road, Stranmillis
(Objection 2334)

The LVRPAC objected to the amplification to the Designation where it refers to the restoration of Lock no.1. The text does not say that Lock no. 1 is within the node. It merely states that the restoration may assist re-opening of the Lagan navigation. The issues raised regarding the practicalities of the restoration are unrelated to the Plan’s provisions. We fail to see how this Designation would prejudice any such restoration and no explanation was provided.

LVRP2 – Clement Wilson Park, New Forge Lane
(Objections 1920 & 2334)

Objections argued that the Lock-keeper’s Cottage is a preferable location for this node. LVRPAC requested that the node be deleted and replaced with a node around the Lock-keeper’s Cottage. The reason given was that node LVRP2 could prejudice the plans to re-develop the cottage. Castlereagh BC merely requested that an additional node be designated at this location. We note that the cottage has been restored. A new building housing an Inn and a park office/visitor centre has been provided, whilst LVRP2 contains no facilities. There is merely a private car park and a grassed area with some bushes. It would appear to make more sense to designate the node as suggested by the objectors because it contains these facilities. In the context of our introductory comments on the role of nodes, we recommend that LVRP2 is deleted and a node is designated at the Lock-keeper’s Cottage.

There is no reference to the suitability of the node for office development and we cannot deduce the basis for this concern, other than the fact that there are several office buildings nearby. Offices are not included in the list of acceptable uses for this node. Office development at this location would be contrary to the office policies of the Plan, in
any event. We cannot comment on a planning application, which is assessed under separate statutory processes.

**Recommendation**

We recommend that Lagan Valley Regional Park Node LVRP2 is deleted and a node is designated at Lock-keeper’s Cottage instead.

**LVRP3 – Dub Lane, Malone Road, Belfast**

(Objections 1807 & 2558)

Objection 1807 (QUB) suggested that the node be expanded to the north-west and west. No reasoning was provided to explain why a larger node was required and we therefore can make no further comment on this objection. We fail to see the relevance of the current planning application for housing on the site that was referred to by the Department, particularly as the Department intended to refuse the same. There was no clarification of the objection to the precise boundaries of the adjoining SLNCI or Historic Park designations. We therefore make no comment on them.

Objection 2558 requested that the site be excluded from the Park and be included within the settlement limit. The site contains the Queen’s University playing fields and pavilion. We note that a new building has been provided within the node to serve the site. The SDL in this locale follows the edge of the built-up area and excludes the open space and land in recreational use. This type of recreation and open space use is perfectly compatible with the character of the Park and is appropriate to a rural area. We agree that the site should therefore remain outside the settlement limit. The objectors also stated that the Node should be re-located due to the impact on Malone Cottages and to move it closer to the existing park facilities at the entrance to Barnett’s Park to the south-east. Malone Cottages have since been demolished and so there is no basis for that argument. Re-location of the node as suggested would also have the effect of moving it close to the Malone House Node, which would not be desirable for the reasons set out in our introductory comments under general matters.

We consider that there should be no change to the Plan as a result of these objections.

**LVRP3, LVRP4 & LVRP5 – Dub Lane, Malone House & Shaw’s Bridge**

(Objection 2334)

LVRPAC objected to LVRP3 and 4 on the basis that the sites already met the criteria set out in the Plan and any further development could or would lead to over-intensification. This could be detrimental to the Park’s character and Malone House, it was claimed. We consider that these concerns relate more to the operation of the development management system whereby proposals are assessed against the plan policies and other material considerations. The effect on the character of the Park is obviously a prime consideration to be taken into account. We have also agreed with the objectors that the acceptable uses should be included in the key site requirements, which would give the Department additional controls over development including changes of use.
The Plan is quite correct when it points out that LVRP5 at Shaw’s Bridge is the most heavily used access to the Park. It would therefore be illogical for this node to be deleted. The Committee considered that there was no scope for small-scale refreshment facilities at Shaw’s Bridge without causing damage to the character of the Park because this is the most heavily used car park and entrance to Lagan Valley Regional Park. They pointed out that the Ramada Hotel and Malone House provide facilities within a short walk of this node. The Ramada Hotel is on the other side of a very busy 4-lane road (A55). We would question the willingness of both establishments to accept the patronage of persons who had been engaged in water sports on the river. We therefore agree with the Plan that there may be scope for limited refreshment facilities without causing significant damage. This is a detailed matter for the development management process. We recommend no change to the Plan other than our general recommendation regarding the inclusion of acceptable uses in key site requirements.

The committee also questioned the need for a foul sewerage pumping main in the absence of significant development on the site (supporting text in Plan refers). The Department may wish to re-consider the inclusion of this statement.

**OBJECTIONS TO THE EXTENT OF LVRP AND TO THE SDL**

**Stranmillis Car Park, Stranmillis Road**  
(Objection 2965/43)

The objection relates to the public car park at the roundabout on Stranmillis Road/Stranmillis Embankment. The sole basis for the objection was that the car park was not considered to be an integral part of Lagan Valley Regional Park. The site was part of LVRP in the BUAP and the Lagan Valley Regional Park Local Plan. We agree with the Department that the site is a valued entrance facility to the Park. It is pleasantly enclosed by banks and trees and links well with nearby green areas. The car park is well-used; the presence of another car park between the Cutter’s Wharf and node LVRP1 is irrelevant to the consideration of this objection, as are the implications for any future unspecified plans the Council may have for the site. We consider that it should remain within LVRP and therefore that there should be no change to the Plan as a result of this objection.

**Lands at Knightsbridge Park, Belfast**  
(Objection 860)

We have set out our conclusions in relation to AOCMD in Part 1 of our report. The Department considered that a reduced area of the site should be included within the settlement limit because of the critical need for social housing in Belfast. The reduced area equated to a disused and overgrown all weather hockey pitch and a 20m wide strip of land along the northern site boundary with Knightsbridge Manor. The proposal involved a Housing Association scheme for Category 1 (elderly) housing. The key site requirements indicated that 20 units would be provided. We were informed at that time that the scheme was in the following year’s programme for social housing. The issues in relation to this site are whether the overall site should be removed from the Lagan
Valley Regional Park and whether the area discussed above should be zoned for social housing.

We agree that the boundaries of the overall site are well defined by mature trees that screen the site from views from the remainder of LVRP. The strip of land from the entrance on Knightsbridge Park to the playing fields is built up with the former Clubhouse (now a day care facility), the new clubhouse, car park and 3 temporary buildings on the area of former tennis courts. This does not mean that it should not be part of LVRP. The objectors expressed concern that the location within the Park meant that they could not gain permanent planning permission for new changing facilities or a pavilion despite no objections from consultees on the application.

The former hockey pitch does relate quite well to the areas of existing housing and the 20m strip appears to be for access from Knightsbridge Manor. The pitch is overgrown and makes no contribution to the recreational facilities on the site. It is well enclosed and screened from the Lagan Meadows. The critical need for social housing and the level of commitment to the site from NIHE, the objectors and a Housing Association persuades us that this is a special case. We consider that the reduced site identified at the hearing (Plan 1) should be zoned for social housing. The suggested key site requirements are unnecessary for the reasons given above in our approach to key site requirements.

It was argued that the boundary definition of the site and its location indicates that it would be logical to exclude the entire site from the LVRP as this would provide a better boundary for the Park than merely drawing an artificial boundary along the social housing site. The Department has explained that the Park boundary at this location has been chosen to follow the extent of the built-up area. We agree with this approach and consider that the Park boundary should contain the recreational open space remaining on the site. One of the two main purposes of the Park is to enhance its use for recreational purposes. The Plan indicates that recreational facilities are an integral part of LVRP. The resultant boundary would follow the edge of the open space and exclude the buildings on the site. This would mean that the social housing zoning and clubhouse area would and should be excluded from the Park. The Department included this land within the hatched area on the submitted plan indicating the extent of the social housing site. We consider that this would assist with the provision of new facilities to replace the temporary buildings on the site. We consider that the recreational open space should be indicated as such in the Plan for information, in line with the approach adopted elsewhere and our strategic conclusions on this matter. The narrow portion of the site around the clubhouse could be left unzoned.

**Recommendation**

We recommend that:

- The areas shown hatched and cross-hatched on Plan 1 be removed from the Lagan Valley Regional Park and included within the settlement development limit of Belfast.
- The area shown cross-hatched on Plan 1 should be zoned for social housing.
- The area shown hatched on Plan 1 is shown as unzoned.
• The remainder of the site to be indicated as existing open space.

Belfast Harlequins Ground, Deramore Park, Belfast  
(Objections 2749 & 3205)

The objection to inclusion within the Lagan Valley Regional Park related to the restrictions it would place on the Club and issues of parity. We attach little significance to the fact that the sites were inside the settlement limit in BUAP. The previous approach was different in that the limit in BUAP extended to the River Lagan and therefore included large areas of non-urban land. The limit for BMAP has been drawn to include the continuous built-up urban area. We have commented on this issue in Part 1 of our report. The objection must be assessed on its own merits as to whether it merits inclusion in the Park and the settlement limit. The land is in use for recreational purposes and so is protected by the provisions of PPS8 whether inside or outside the SDL, in any event. The Park also has a clear function to facilitate recreational uses and so the sports ground use is not incompatible with this purpose.

The objection sought inclusion within the SDL as a minimum if the exclusion from the Park was not successful. There was no project or proposal advanced in support of the objection. The club has gained planning permission for new stands and clubhouse in spite of the site being located in LVRP. We are not persuaded that any possible future sale of land to subsidise the Club is a factor that alters our view on the objection.

The Park contains many recreational facilities in private and public ownership. The key issue is whether the site is a logical part of LVRP or not. The site is separated from the park by fencing and vegetation. It is at a somewhat higher level than the lands to the east but not lands to the north and south (also within the Park). There are stands and a clubhouse present on the site. These facilities are not inconsistent with the character of the Park. We consider that the lands are used by the public for recreational purposes, albeit that the public have to be members of the club. This is often the case with recreational lands in the Park. The site is in character with the Park. There remain extensive areas of open space within the site. It meets the twin objectives of the Park in terms of landscape character and recreational use by the public.

We do not consider that there needs to be a nature conservation interest for lands to be included in LVRP. The site has always been within the Park. We note that development on the site would be restricted by the provisions of PPS8, in any event. No convincing case was advanced to support the inclusion of the site within the SDL. The PSNI sport’s ground at New Forge Lane is within the Park and the SDL. The Department explained that this was an error and the SDL should only go around the built-up urban form. The Annadale allotments were considered to be an urban related use and were also a new addition to the Park in the Plan. Other recreational facilities and sports grounds were within the Park and outside the SDL. We have considered the YMCA site above. The recommendations of the Commission on the BUAP Inquiry in respect of lands that were formerly part of the YMCA site were specific to the lands and arguments presented at that time and do not pre-determine the consideration of all future urban fringe sites in LVRP. In the context of the evidence presented in support of this objection we recommend no change to the Park boundary or SDL.
No evidence was provided to explain why the SLNCI Designation on part of the site was not justified. We have set out our conclusions in relation to AOCMD in Part 1 of our report. In view of our conclusion that the site should remain outside the SDL then it is not in a suitable location for designation as a DOS.

**Lands at New Forge Lane**
(Objection 3346)

The lands lie at the end of a side lane off New Forge Lane and partly within a bend of the river. There is a complex of disused buildings in the northern portion of the site (formerly a QUB medical research laboratory) and a disused golf driving range on most of the remainder.

The original objection made no reference to housing on the site and we cannot therefore consider this issue that was subsequently raised in the statement of case. There are no open space designations affecting the site within the Plan. Planning policy in relation to open space is contained in PPS8. We can discern no actual objection to the site’s inclusion within LVRP in the submissions. The issue under consideration therefore is whether the site should be within the settlement limit or not.

We note that the site was within the SDL in previous plans and acknowledge the planning history of approvals for offices on the site of the former research laboratories and leisure facilities on the site of the former driving range. The planning permissions were granted in 2004 and will have lapsed. In any event, this is a new plan for the area and the issues must be considered afresh. The fundamental problem with the objection is that the site is isolated from the settlement limit and it would be illogical to include the identified site. We also accept the Department’s logic in drawing the limit to correspond with the continuously built-up area. The buildings on the site are some distance from the limit and built-up area to the north. They are relatively low key and not readily visible from either the river or New Forge Lane itself, where only the chimney flue can be seen. The use of the site as open space would be acceptable in principle and so Belfast City Council’s support for that aspect of the objection is not particularly germane to the main issue under consideration. We accept that access issues could probably have been resolved by negative conditions. In view of the site’s distance from the continuously built-up area, we conclude that it should remain outside the SDL and recommend no change to the Plan.

**Lands at Hunter House College**
(Objections 334 and 1981)

The objection site lies within the settlement limit where there would be no presumption, in principle, against housing development. The critical issues in the objection that are likely to impinge on any housing proposal are: the extent of proposed LLPAs BT131 and the proposed extension of the LVRP into the settlement and the site.

LLPAs are proposed throughout the entire BMA. We have considered the strategic aspects of such designations in Part 1 of our report. The Plan, on page 298 of the Belfast District Proposals, identifies the features that it considers to warrant designation of the BT131 LLPAs. We do not therefore agree with the objector that the Plan does not
advance any case as to why protection of the key features of the lands requires the designation of an LLPA. We do not agree with the objector’s view that because protection of some of the features of the LLPA can be achieved through legislation, that there is no justification for the LLPA designation. Neither do we accept that the LLPA should be excluded from lands that warrant designation simply because they are viewed by the school as surplus to requirements and suitable for development. Argument that development of these lands would generate investment funds for the school premises, and allow the restoration and maintenance of a listed building, would be matters to be weighed as part of the development management process, as would an offer of compensatory measures for habitat loss, in connection with any proposal.

It is not uncommon for LLPAs to lie adjacent to higher density development. The location of the school grounds within the urban area is no impediment to LLPA designation; neither is the presence of overhead lines or a pylon on part of the site, which do not have a significant adverse impact on visual amenity or nature conservation value. The proposed Blacks Road Link across the south western part of the school grounds will affect only that specific area, with the majority of the proposed LLPA remaining unaffected. The absence of public access to the land is not a factor that precludes designation. We consider that the ‘surplus’ lands are an important visual element within the school grounds; they are clearly seen from the major roads in the area, including the M1 motorway, and contribute to the amenity of the locality. They clearly have nature conservation value in their unmanaged state and we consider that this will increase over time as young trees continue to grow. The conservation interests of the site do not have to be rich or exceptional to be significant. We do not agree that the land has a neglected or unkempt appearance.

The remainder of the school grounds contains a mix of managed grassland, buildings, sports facilities and mature trees and shrubs; all of these elements are visually interrelated. The grounds are an attractive feature in the urban environment and the mature vegetation has an obvious nature conservation interest. We consider that the proposed LLPA designation in the Plan is justified.

We note the Department’s comment at the Inquiry that the LLPA designation on the ‘surplus’ lands would not automatically preclude development but that surveys would be required to identify nature conservation interests, which need to be respected. We agree that to zone the site for housing would be premature in the absence of adequate information and details of the likely impacts on the LLPA. It lies within the SDL and can be left unzoned. Given this, we do not propose to consider arguments relating to the visual impact of proposed housing or the suitability of access arrangements. These would be matters for the development management process.

The above conclusions are also critical to the decision as to whether the site merits inclusion in Lagan Valley Regional Park. We have concluded above that the “surplus lands” are an important visual element contributing to the amenity of the area and that the wider school grounds are an attractive feature in the urban environment. Only part of the school grounds and the site are within LVRP, in any event. We consider that the land is worthy of inclusion in its own right and links well to the remainder of the Park to the south and south-west. In this context we consider that the land should remain within LVRP.

We recommend no change to the Plan as a result of these objections.
Land at 58a Dumurry Lane  
(Objection 1743)

This objection was to the inclusion of a site at No. 58A Dunmurry Lane within LVRP, LLPA Designation BT 131, SLNCI and AOCMD Designation BT102/15. Our conclusions on AOCMDs are set out in part 1 of our report.

The site presently contains a mixture of trees and shrubs. This vegetation extends northwards and eastwards beyond the site. To the east is a row of roadside dwellings with two backland properties to the rear of No. 54. These sit against a backdrop of mature trees. The site and surroundings lie within a proposed extension of the LVRP into the development limit; we note that there are no objections in respect of the proposed LLPA, or Park extension on adjacent lands. The proposed BT102/15 SLNCI includes the northern half (approximately) of the site, together with lands to the north east and north west.

No reasoning or analysis was provided to explain the basis for the objection to Lagan Valley Regional Park. We presume that it is intended to relate to the identified site only. It would be illogical to exclude this site from the Park, as this would leave a gap in the midst of the LVRP in this area. We note that there are many locations where dwellings have been included within the Park boundary.

We were advised that outline planning approval for residential development was granted in January 2001. The objector stated that a subsequent full application had been submitted in November 2002. A plan dated December 2003 was submitted with the objection, showing 2 dwellings sited within the plot. These lie just inside the proposed SLNCI.

We have no explanation from the objector as to why the site should be excluded from the LLPA designation. Neither have we any information confirming that approval was granted for two dwellings. We note that the outline consent and full application predated publication of the draft Plan. Some kerbing has been laid at the access to the site (as shown on the submitted drawing) but no further development is evident. Given the current condition of the site, we are not convinced that it should be excluded from the LLPA, whether or not planning permission has been approved. The adjacent dwellings lie within the proposed designation and the site, if developed, would presumably evince a similar character. We note that the drawing appears to show retention of a large number of trees within the plot.

The proposed SLNCI does not include the dwellings to the west. We consider that, should there be an extant planning permission on the objection site, the SLNCI should be amended to exclude the approved dwellings from same. Any mature vegetation retained to the rear of any dwellings should, however, be retained within the designation. We remit the issue to the Department and recommend that the Plan is amended, if appropriate.
**Recommendation**

We recommend no change to the proposed LLPA as a result of this objection. Should there be an extant planning permission on the site, the SLNCI should be amended as per our conclusions.

**NATURAL ENVIRONMENT**

**Sites of Local Nature Conservation Interest**

Designations BT 102/04 – Barnett’s Demesne & BT 102/13 – Clement Wilson Park & BT 102/20 – Lagan Meadows

(Objections 2145 & 2965)

The objectors suggested that additional areas of land be included within the above SLNCI designations. The suggested additions were considered to mirror the characteristics of the areas of land included in the Plan designations. The first two contain parkland and mature trees. The Lagan Meadows site contains woodland, scrub and grassland similar to the adjoining SLNCI. The Department agreed with this analysis and recommended that the lands identified in the aerial photographs submitted with the statements of case should be included in the respective SLNCIs. We agree that the areas identified do complement the SLNCI designations and should be included. We note that the inclusion of the Lagan Meadows site will rationalise the boundaries of the SLNCI and Local Nature Reserve. The Department provided plans for each SLNCI that matched the aerial photographs submitted by the Council. We consider that these plans should be used to identify the sites.

**Recommendations**

We recommend that the boundaries of Designations BT 102/04 – Barnett’s Demesne; BT 102/13 – Clement Wilson Park and BT 102/20 – Lagan Meadows are amended as shown in the plans supplied by the Department.
CASTLEREAGH

OBJECTIONS TO LAGAN VALLEY REGIONAL PARK NODE DESIGNATIONS

CR08 – Belvoir Education Centre & CR09 – Belvoir Activity Centre
(Objection 2334)

The objection was on the basis that no acceptable uses for the nodes had been defined in the Plan. Policy COU 14 identifies the range of acceptable uses permissible in every node. We have commented on the range of uses in Part 1 of our report. The introductory paragraphs on Page 115 of the Castlereagh Volume provide guidance as to the type of development that would be acceptable. The amplification to both Designations sets out the existing uses of the nodes and what type of use may be acceptable subject to the limitations identified. We have recommended under General Matters that acceptable uses for each node should be included as key site requirements and consider that this will address the objector’s concerns. Designation CR09 contains the wrong map reference: it should be 8m and not 9k.

Suggested Node at Lock-keeper’s Cottage – see under LVRP2 above.

OBJECTIONS TO THE EXTENT OF LVRP AND TO THE SDL

Land at 114 Milltown Road, Belfast
(Objection 3409)

The site is an existing dwelling and garden on the south side of Milltown Road. The SDL follows Milltown Road in this area. There is development on the southern side of Milltown Road to the east. However, this is some distance from the site and is visually separate. The site is well-screened to views from the road. We consider that Milltown Road provides a logical and defensible settlement limit at this location. The inclusion of this isolated site on the opposite side of the road would therefore be inappropriate. No reasoning for the objection was advanced. Lagan Valley Regional Park extends along both sides of Milltown Road in this area. The land forms an intrinsic part of the Park and should be retained within the Park. The land is not within an AOHSV: perhaps the objectors considered Lagan Valley Regional Park to be an AOHSV. We have set out our conclusions on AOCMD in Part 1 of our report. We recommend no change to the Plan.

TRANSPORT

Proposals BT 014/03 and MCH 17/02 – Rapid Transit Scheme (Revised) 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)
We also report on these proposals in the Belfast and Castlereagh Volumes of our report. We include the report here again as part of the route is within LVRP. 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.”

**NATURAL ENVIRONMENT**

**Sites of Local Nature Conservation Interest**

**Designation MCH 32/03 – Belvoir**
(Objections 2145/7 & 2965/49)

These objections were considered in the Castlereagh Volume of our report. The objections are reported again as the lands lie within Lagan Valley Regional Park.

The objectors sought the extension of Designation 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. The Department provided plans for each SLNCI that matched the aerial photographs submitted by the Council.

**Recommendations**

We recommend that the boundaries of Designation MCH 32/02 – Belvoir are amended as shown on Plan 2.
LISBURN

OBJECTIONS TO LAGAN VALLEY REGIONAL PARK NODE DESIGNATIONS

Designation LN 11 LVRP Node – Ballyskeagh
(Objections 2022/76 and 2334)

The Plan states that there are no key site requirements for this node as Lisburn City Council have commenced development of the site as a parkland area. This park has been provided and is known as McIlroy Park. Paths, landscaping, access to the towpath and links to the footbridge across the river have been provided. The council’s objection seeks minor amendments to the boundaries to include the access to the site and car parking area. They seek the exclusion of a small part of the node because it may be the subject of future development by Lisburn Distillery FC. The Departmental response does not fully address the objection but appears to be supportive of the suggested boundary changes. In the evidential context, however, we consider that the minor amendments to the boundary of the node as shown in the original objection are supported by the Department and recommend accordingly. As McIlroy Park is a Council initiative to improve access to the Lagan towpath, we fail to see how access to the towpath could be inhibited. We have addressed the issue of acceptable uses in our General Matters section on page 1 and recommended that acceptable uses should be listed as the first key site requirement for each node. Even though the land is already developed, the inclusion of such a key site requirement would control future development or change of use.

Recommendation

We recommend that the boundaries of Designation LN 11 are amended as shown in objection 2022/76.

Designation LN 12 LVRP Node – Glenmore Activity Centre
(Objection 2334)

It is implicit that new development should be in keeping with the scale of the existing buildings. Policy COU 13 requires that development is in scale and character with the Park. The water based recreation activity already takes place and the possible risk to health from a sewage works upstream is an operational matter. There is no reference in the Plan to a new footbridge in order to gain access to the towpath. Should such a bridge be proposed then planning permission would be required and the views of LVRPAC would be taken into account. No changes are required in response to these comments.

Designation LN 13 LVRP Node – Coates Barbour
Zoning LC 08 – Mixed Use Employment Site
Designation LC 32 Hilden ATC
(Objections 1964, 2022/46 & 47, 2334 and 3271)

We consider that this is a very important site containing large mill buildings that are an important element of the industrial heritage of Northern Ireland. Re-development of the...
site to bring these buildings back into beneficial use should be a priority for the Department.

The Department considered that residential use would be acceptable on the site to facilitate the regeneration of the buildings on the site and to provide an element of social housing because NIHE had indicated that this was a suitable location for same. The Department considered that the island should be brought within the SDL but remain in LVRP as a node. The boundary of the Park would remain as the River Lagan, with the mixed use zoning to the west and the node to the east. We would draw the Department’s attention to the fact that a small portion of the site near the bridge was included in their node boundary despite being on the western side of the river. This relates to the small area around the electricity sub-station.

The objectors (objection 1964) confirmed that it was their intention to develop the site for high density residential, light industrial, museum, crèche, local retail and office uses (replacing those on site). The objectors confirmed that they were content with the Department’s position. Lisburn City Council had objected requesting that residential use be added to the zoning and node; that objection was therefore satisfied and the main objectors confirmed that the Council were content with the proposals for the site. The residential use would also partly address the concerns of objection 3271. We agree with the Department that there should be some employment use on this mixed use site. There was no basis provided for the objection to the ATC and so we cannot consider the objection further. As the site is zoned for mixed use development, we see no need for it to be designated as a DOS as well. This point was not pursued by the objectors. The LVRPAC comments seem to be by way of passing commentary on matters that will be addressed in the planning application for the site.

We shall only deal with the detail of the zoning and Designation in the light of the agreement reached by the parties. The Department’s suggested key site requirements for the Zoning and the LVRP Node were discussed and broadly agreed. We would refer to our general comments on key site requirements at the start of this volume. Interestingly, the Department made no reference to any requirement for an element of social housing in their list of key site requirements. We must therefore conclude that the comments of NIHE were not translated into an actual requirement by the Department. Nonetheless, we have recommended that the Department review all zonings in the light of the shortfall in social housing provision that we have identified and we therefore remit this zoning to the Department for such consideration. We shall comment on the key site requirements that were suggested and the objectors’ amendments below.

Zoning LC 08

The area of the site was disputed and so should be corrected in the headnote. We agree that there should be a list of acceptable uses and that residential should be first as this will be the largest use. The office use is of a scale that was previously present on the site and in this context that is reasonable. We consider that the key site requirement should specify that this is a once off overall total for the site for the avoidance of doubt. The transport and landscaping key site requirements are covered above and therefore not required. We understand that small parts of the site are in the floodplain and so a key site requirement is needed on this issue, which also applies to the Node. The site investigation for contaminated land and proposed remediation should be undertaken prior to any planning permission being granted on the site, as this
is an issue going to the principle of development. We agree that the bullet points regarding integration of the Lagan and canal and scale and form of development are not necessary given the site's location, the scale of the buildings on the site, LVRP policies in the Plan and the consideration of proposals as part of the development management process.

Designation LN 13

The Department's suggested key site requirements were broadly accepted by the objectors. We make comments on them, as they are before us. The bullet points related to landscaping are addressed in our general comments on key site requirements and are not necessary. A built heritage assessment is required by another key site requirement and this should address how heritage features are to be protected. We therefore consider that a separate requirement to this effect is not necessary. The key site requirements indicate that residential and hotel development would only be acceptable in building A and this implies that building A must be retained if these uses are to be provided within the node. The suggested sentence regarding the preference for retention is not therefore appropriate. The transport assessment requirements are covered by regional policy. We would again question how the need for a requirement that the river and canal be integrated into a development proposal for the reasons given above and because this is a requirement of our recommended Policy COU 15, in any event.

Recommendations

We recommend that:

- The entire site be included within the settlement limit, but the Lagan Valley Regional Park boundary should remain unchanged.
- Zoning LC 08 shall relate to the site west of the river.
- Designation LN 13 shall relate to the portion of the site east of the river within Lagan Valley Regional Park, as coloured in yellow on the attached Plan 3.

The wording for Zoning LC 08 and Designation LN 13 shall be as follows:

**Zoning LC 08**  
Mixed Use Site  
Land at Barbour Threads Mill, Mill Street

*Land is zoned for mixed use development as shown on Map No. 2/001 – Lisburn City*

**Key Site Requirements:**

- Development shall only include the following uses:
  - Residential;
  - Light industrial use as currently specified in Class B2 of the Planning (Use Classes) Order (Northern Ireland) 2004;
  - Storage or distribution use as currently specified in Class B4 of the Planning (Use Classes) Order (Northern Ireland) 2004;
• Business use as currently specified in Class B1 (a) of the Planning (Use Classes) Order (Northern Ireland) 2004 up to a maximum of 1623 square metres in total on the site;
• Business use as currently specified in Class B1 (b) and (c) of the Planning (Use Classes) Order (Northern Ireland) 2004;
• Interpretive/visitor facilities;
• Museum;
• Education/heritage uses;
• Water based recreation facilities;
• Refreshment facilities; and
• Small scale retail facilities to serve local needs.

➢ Development of the site shall only be permitted in accordance with an overall comprehensive masterplan for the site as approved by the Department. This shall outline the design concept, objectives and priorities for the site and shall take account of the adjacent Lagan Valley Regional Park Node – Designation LN 13.

➢ A detailed site investigation shall be carried out to establish its suitability for the proposed end use. The investigation shall include historical research, soil analysis and boreholes as necessary in accordance with best practice. The investigation shall include an action plan to remedy any contamination found. Details shall be submitted for the approval of the Department prior to any planning permission being granted on the site.

➢ A built heritage assessment shall be submitted with any planning application and shall include details of how heritage features are to be protected and incorporated within the scheme. Detailed consultation with Northern Ireland Environment Agency (Built Heritage) will be required.

➢ Small sections of the site on the southern and eastern boundaries are situated in the River Lagan floodplain. A flood risk assessment shall be carried out and submitted to the Department to inform proposal for the development of the site.

Designation LN 13

Lagan Valley Regional Park Node – Island at former Barbour Threads Mill

Key Site Requirements:

➢ Development shall only include the following uses:
  • Interpretive/visitor facilities;
  • Education/heritage uses;
  • Water based recreation facilities;
  • Refreshment/restaurant facilities; and
  • Public open space.
  • Residential;
  • Hotel development;
Residential and hotel development will be confined to the existing building marked A on Plan 3. Development shall be in keeping with the scale and character of the existing building.

- Development of the site shall only be permitted in accordance with an overall comprehensive masterplan for the site as approved by the Department. This shall outline the design concept, objectives and priorities for the site and shall take account of the adjoining mixed use Zoning LC 08.

- Access shall be from Mill Street via Zoning LC 08 or from Hilden Road, subject to the agreement of Roads Service and the substantive retention of the mature trees on the northern portion of the site and as agreed by the Department.

- A built heritage assessment shall be submitted with any planning application and shall include details of how heritage features are to be protected and incorporated within the scheme. Detailed consultation with Northern Ireland Environment Agency (Built Heritage) will be required.

- All buildings shall be of a scale and form appropriate to the riverfront location and shall be agreed with the Department.

- Public access shall be maximised to the area north of the building marked A on Plan 3, as agreed with the Department.

- A section of the site is situated in the River Lagan floodplain. A flood risk assessment shall be carried out and submitted to the Department to inform proposal for the development of the site

Designation LN 14 LVRP Node – Lisburn Civic Centre
(Objections 2022/75 & 2334)

The Council objected to the fact that the Plan uses an out of date map base to identify this node, which prevents assessment of its extent. We agree that the fact that the map does not show the Island Civic Centre is not helpful. The Department should now be in a position to address this issue. The Council’s suggestion that the canal and restored lock be included in the node appeared to be supported by the Department. We assume that the revised boundaries indicated on the Council’s objection exclude the car park at Millbrook as this was part of their objection. This car park is fenced off and appears to be in private ownership. The car park is unrelated to the civic centre and is physically separate from the remainder of the node. It appears that the Council’s suggestions are supported by the Department. We do not demur and recommend accordingly that these boundaries are adopted in the Plan.

The Council also objected to the identification of the car park at Millbrook as open space. Open space is indicated for information only in the Plan. Nonetheless, this car park is not ancillary to the open space and serves a range of users. We note that this car park is located on the extreme western edge of the identified open space in the Plan Map 2/001. In these circumstances, we recommend that the car park is excluded from the area of existing open space.
We would agree with LVRPAC that there would appear to be limited scope for further development at this node in view of the facilities already provided here. We have addressed the issue of acceptable uses in our General Matters section on page 1 and the Department may wish to consider their inclusion to control future development or changes of use.

**Recommendation**

We recommend that the car park at Millbrook is excluded from the area of existing open space on Map 2/001 and that the boundaries of Designation LN 14 are revised in line with the plan submitted by Lisburn City Council as part of their objection and that up to date maps are used to indicate the extent of this node.

**Designation LN 15 LVRP Node – Union Bridge**

(Objection 2334)

The objection broadly supports the Designation and raises concerns regarding the possible effects of any development on the towpath. The Plan refers to this node opening up access to the river and the wider path network within the Park. On this basis we are confident that the Department would safeguard the towpath and access to it as part of the consideration of any development proposal.

The objection also refers to the provision of a requirement for a pedestrian underpass beneath Union Bridge. Union Bridge is outside this node. There would appear to be significant physical constraints to the provision of such an underpass and linking it to the existing path network. We have no information that this suggestion is feasible or practical and whilst it may be a worthy objective, we cannot endorse it as part of this plan process.

**SUGGESTED ADDITIONAL NODES**

For suggested nodes within or adjoining Drumbeg, Edenderry and Lambeg, please refer to the section below dealing with each of those settlements.

**Lands at Hillsborough Road (also Designation LN 16 LVRP Node – Hillsborough Road)**

(Objections 667, 807, 2146 & 2334)

LVRPAC objected to Designation LN 16 on the basis that as there is no use on the site then the acceptable uses in keeping with the predominant character of the area could be open to misinterpretation. We have recommended that the Plan lists the acceptable uses in the key site requirements for each node. Residential and office uses would not be included. They also suggested an alternative location for this node, which we consider below.

Objection 2146 included all the land to the west of Hillsborough Road between the river and no. 146. A hotel and pub/restaurant has been constructed on the southern portion of the site. The hotel was being extended at the time of writing. The Department agreed that a node should be designated on this part of the site. The objectors were
content with this Departmental concession. LVRPAC referred to the fact that Union Locks is included as a node in Volume 1-3 of the Plan (p. 139), but not mentioned in the Lisburn volume. It was suggested that this would be a better location for a node than Designation LN 16 because of its location at the gateway to the Park and the heritage features associated with the area. The site adjoins the locks to the east.

We consider that a node should be designated in the light of the Department’s concession, support from other objectors and as a hotel and restaurant has been constructed on the site.

We refer to our general comments on nodes in the introduction to this report and consider that the designation of a node on the site would obviate the need for a node as proposed under LN 16 which is an unspoilt piece of land within a SLNCI and has no vehicular access from the road. Given that the site is a replacement node for LN 16 then its size must be increased to provide room for the acceptable uses identified on p. 318 of the Plan. The field adjoining and around the site has well defined boundaries as does the adjoining dwelling no. 132 Hillsborough Road. We note the absence of linkages from the site of the hotel to the River Lagan and the towpath or to the locks to the west. This latter point is surprising in that the Departmental submissions included a key site requirement to the effect that the River Lagan, which forms the western boundary of the site, shall be integrated into the proposed development. This appears to have been completely ignored in the planning application process, despite the fact that the application was pending at the time of the Inquiry. Expansion of the site would allow for these essential links to the river to be provided, together with some additional car parking facilities, if necessary.

Objection 807 sought the inclusion of an extensive area of land on the other side of Hillsborough Road within Designation LN 16. No evidence or supporting explanation was provided. The site contains a dwelling and landscaped grounds as well as lands to the west. We consider that the site is too large to include within this node. It is also poorly related to the Designation itself. This is an attractive area of riverside vegetation forming a buffer between the housing area to the north and the river. As we recommend that Designation LN 16 should be deleted, we do not propose to consider this objection any further.

**Recommendation**

We recommend that LVRP Node Designation LN 16 is deleted and replaced with a Node on the southern portion of objection site 2146 comprising the existing hotel and lands to the north. We recommend that the acceptable uses include the hotel use, restaurant use, car parking and uses associated with biodiversity, amenity, information and outdoor water based recreation. We recommend that the key site requirements provide for links to the River Lagan and Union Locks.

**Lands at Hillsborough Old Road**

*(Objections 3018 and 3243)*

These objections related to the same site and variously sought the removal of the site from LVRP and Hillsborough Old Road SLNCI (Designation LC 20/06) and designation of the site as a LVRP node. This contradiction was clarified at the Inquiry. The objector
confirmed that the land should be within the Park and designated as a node. It is on this basis that we will consider the objections.

The objection was predicated on the provision of a hotel on the site because there were none related to the canal (sic) in Lisburn. This objection has been overtaken by events in that there is a new hotel a short distance away from the site (the previous objection site). We have recommended that this hotel site is designated as a node. The circumstances of this approval are irrelevant to the consideration of this site and objection in an Area Plan context. Its existence negates the objectors' arguments regarding the need for a hotel on the site. The point made regarding other LVRP Nodes not providing for hotels has also been overtaken by events. Designation LN 13 at Coates Barbour Mill includes a hotel in the list of acceptable uses accepted by the Department and now by the Commission.

We consider that development of the site would be prominent because of its sloping nature. This part of the Park consists of open fields running up from the river to the Hillsborough Old Road. The character of this part of Hillsborough Old Road appears rural on this northern side. There is no development on this side of the road to the west of Altona Terrace apart from the adjoining dwelling, which is well enclosed and also in keeping with a rural area. The slope on this site faces the main A1 and so development would be particularly visible from Moore’s Bridge. The site is also open and prominent in views from Hillsborough Old Road and Altona Road opposite the site.

We refer to our introductory comments on nodes. We have recommended that Designation LN 16 is deleted in favour of the existing hotel site. In this context, it would not be appropriate to designate a node on a greenfield site so close to a node with hotel, restaurant and pub facilities already developed. We do not therefore support the objection and recommend no changes to the LVRP Nodes in this area.

The objectors appeared to resile from their position of total opposition to the SLNCl Designation in the statement of case and at the Inquiry. The SLNCl was not considered to be an obstacle to the development of the site. The ecological consultants concluded that the SLNCl was warranted on the site and that key site requirements could protect those features worthy of protection. We therefore recommend no change to the SLNCl as a result of the objection.

**OBJECTIONS TO EXTENT OF LVRP AND THE SDL**

**Lands at Seymour Hill Industrial Estate**

(Objection 2156)

The objection sought the exclusion of land within and to the east of Seymour Hill Industrial Estate from LVRP. The land to the east is outside the SDL in the Plan. The objection sought the designation of the site as a “Key Local Employment Site”. We presume that this implicitly seeks the inclusion of the eastern part of the site within the SDL. The industrial estate is unzoned in the Plan and there is an adjoining housing Zoning ML 03/05, which is also the subject of an objection.

The Departmental statement of case referred to the justification for the SDL is contained in the Countryside Assessment TS. This is in an Appendix that contains a general
description of the proposed metropolitan development limit along with a general reasoning for the boundary rationalisation. It does not address the specific objection in respect of this site and did not assist our consideration of the objection.

The objectors have set forth a business case for expansion on this site in terms of the benefits to the local and wider economy, local employment benefits in terms of the deprivation in the area, costs of re-location and the shortage of storage space on site. Evidence that the workforce live in the immediate area was supplied broken down by postcode. The shortage of storage space has resulted in a large number of containers being required as a temporary solution. The Department’s case did not address these issues and instead relied on the fact that there are other employment sites available in the Metropolitan Lisburn area. The other factor not addressed by the Department’s or objectors’ case is the fact that new factory buildings have been approved and built on both sides of the river. This fact has not been taken into account in defining the SDL or appropriate zoning for the site.

We note that the overall site and the lands to the west (including the Seymour Hill Historic Park, Garden and Demesne – Supplementary Site) were included within LVRP in the Lagan Valley Regional Park Local Plan and BUAP. There is therefore no change proposed in the Plan. We consider that the lands to the west are very attractive planned estate grounds with mature landscaping, which should remain within the Park. The exclusion of the objection site from the Park would result in a gap separating the lands to the west from the remainder of the Park to the east of the site. We cannot therefore endorse the removal of the site from LVRP. The sole basis for the objection was to allow for the growth of the business through an employment zoning and we generally accept the objectors’ evidence on the business case. The status of the site as part of the Park does not appear to have been an impediment to planning permission being granted for the new buildings. We shall consider the employment zoning below.

The Department’s approach to employment land in the Plan has been to zone all existing employment land within settlement limits. There was no explanation offered as to why the existing industrial estate had not been zoned. We see no impediment to the zoning of existing urban employment land just because it is within LVRP. The land is in use for employment purposes and the business has expanded in recent years. The Department appears to have allocated Zoning ML 03/05 for housing because of one approval for apartment development in 2001. The planning history contains more recent approvals for industrial and office buildings. We note that two new industrial buildings have been constructed on the site. The site is hard surfaced and the remaining old buildings thereon are in industrial use. In the light of this we consider that the housing zoning is not appropriate. We do not agree with the Department that it provides more flexibility. Indeed, it is actually contrary to the Department’s own rationale and methodology for zoning housing sites. As stated above, the business has expanded onto land to the east of the river. This new building is clearly part of the overall business and is linked to the existing industrial estate in two locations. We consider that all the land in employment use in this site should be zoned as existing employment land in line with regional policy and the approach in the remainder of the Plan. There is no basis for the term “Key Local Employment Site” in any regional or Area Plan policy and we do not recommend the use of such a term in this instance.

This leaves the remaining undeveloped portion of the site east of the river to be assessed. The planning history provided at the Inquiry however, included an outline
application for the expansion of the industrial estate of 4 industrial units (1,800 m² each). A schematic layout submitted with the objection showed a development of 4 units on the undeveloped remainder of the objection site. It is a matter of public record that the outline application was approved on 1st December 2009. We therefore recommend that the Department review the extent of the employment zoning in the light of any extant planning permissions on the site. Although the objection does not explicitly state that these lands should be brought within the SDL, it must be implicit from the request that they are zoned for employment use. We agree that the lands in use for employment or with an extant planning permission for same should be brought within the SDL.

Designation ML 13/07 Seymour Hill SLNCI applies to part of the site. This was not the subject of any objection and so we cannot make any recommendations in relation to this SLNCI. We note that the recently constructed and extended building to the east of the river is within the SLNCI. The land to the east appears to have been disturbed and the field to the north is outside the SLNCI.

Recommendations

We recommend that an area of existing employment is zoned to include the existing industrial estate, Zoning ML 03/05, and the recently constructed building to the east of the Derriaghy River. We further recommend that the Department also includes any land with an extant planning permission for employment development within the Existing Employment Zoning.

We recommend that the lands zoned for existing employment are then included within the SDL.

Lands at Maple Crescent, Seymour Hill Estate, Dunmurry
(Objection 3825/91)

Site 1

The site was not identified on the objectors’ map, but from reading the objection we conclude that it relates to the two existing apartment blocks outside the SDL on the north-eastern side of Maple Crescent and at the end of Willow Gardens. The Countryside Assessment Technical Supplement states that the SDL was adjusted so that it follows the edge of the built form of Lisburn City and the metropolitan area. The description of the boundary in Appendix 3A states that it continues to follow the urban footprint at this point along the rear of semi-detached properties in (inter alia) Maple Crescent. The Department’s case rules out inclusion of these properties because they are in LVRP, do not meet RDS directions and they are on the opposite side of the roads. The issue is whether a small site should be within the SDL or not and so the RDS directions and whether the site is in LVRP are irrelevant. We consider that the site reads as part of the estate and is fenced off from the adjoining open space. Inclusion of the site would provide as satisfactory a settlement limit as the proposed boundary. The objection proposes that a small area of existing built development adjoining the settlement limit should be included. This would appear to accord with the rationale used to draw the SDL in the Plan. We therefore support the inclusion of the apartment blocks and associated development.
**Recommendation**

We recommend that the site of the two NIHE apartment blocks at Maple Crescent should be included within the SDL.

**Site 2**

NIHE referred to other land it owns in Seymour Hill that has been excluded from the SDL. We have no idea what the area of the site is, as the supplied map could include large tracts of open space, recreational land and open countryside. We cannot therefore comment other than to say that we agree with the general approach of the SDL following the edge of the built development in this area. We generally consider that existing recreational open space serving housing estates should be retained for that purpose unless it is not required or not in use. We recommend no change to the Plan.

**Lands south of Lambeg Road, Deadwall Plantation (Objection 3411)**

The objector clarified that the objection was solely to the SDL and not to LVRP Designation. The AONB is not designated as part of the Plan process and so objections in that regard cannot be considered. The objection was predicated on the development of the eastern portion of the site for social housing or a recreational use (a Scout hut was mentioned). We calculate that this portion of the site is approximately 1 hectare. The remainder of the site including the western portion of the open area, Deadwall Plantation (mature trees) and an island in the river would be transferred to Lisburn City Council’s ownership.

We have concluded that there is a critical need for social housing in the Plan area and particularly the metropolitan area. We note that there was no evidence of any support from housing providers, but this is not the end of the matter as the Department seems to think. The contribution of the site to meeting the identified social housing need must be weighed in favour of the proposal. The offer to transfer the remainder of the land to the Council is another factor offering potential benefits. The Council own the lands to the south, which consist of playing fields and open space. The Council support the objection and attended the Inquiry in that capacity. They stated that there are plans for the development of the area to improve public access and recreational use. The management of Deadwall Plantation would be more likely were it under Council control. The importance of this very old established area of woodland was acknowledged by the Department. There was evidence of some vandalism and anti-social behaviour in this area, which can be accessed from the south. This may be illegal but it still occurs and is not being controlled. The portion of the site proposed for development does not appear to be in use for any purpose.

Against these potential benefits we must weigh the impact of development on LVRP. The proposed development site is reasonably small and well screened by the surrounding mature trees and existing development to the north. It cannot readily be seen from the towpath. There is limited open space to the west of the river in this area, but the site is set back approximately 150m from the river at this point. The site sits into a corner in the SDL and relates well to the existing dwellings to the north. These dwellings are open to view from the site. We consider that the contribution (albeit a
modest one) of the site to meeting social housing need and the transfer of lands to the Council would represent matters justifying the principle of inclusion of the identified site within the SDL.

We have a remaining significant concern with the objection. The proposed development would be accessed from Glenmore Park over 200m away. This would involve the construction of a road across the open space/playing fields and through the Deadwall Plantation. There is no such access at the moment. We consider that the construction of a road through the recreational open space and particularly through the plantation of trees would have significant detrimental effects on the landscape character of the Park. For this reason we consider that the objection must fail and we recommend no change to the Plan.

**Lands at Glenmore**
(Objection 3825/22)

NIHE referred to land in its ownership at Glenmore that had been excluded from the SDL. The plan attached to the objection does not define the site in question. The Department assumes that the objection relates to the land between Glenmore Park / Glenmore Drive and the River Lagan. This is a reasonable assumption. The site includes the Glenmore Activity Centre, which is a designated node in the Plan. This centre is in use for recreation purposes. The land to the north of the centre is also in use for recreation purposes. The remainder of the site is well maintained open space to serve the nearby housing areas. The SDL follows the built development in the area and this leaves a quite narrow strip of land separating it from the river. We consider that the size of the site, its location and its beneficial recreational use mean that the Plan should not be changed as a result of this objection.

**Lands at Huguenot Drive**
(Objection 3825/22)

We shall assess the objection on the basis of the Department’s assumption that the site includes the 4 small blocks of flats and the rows of garages to the north. The site adjoins a corner in the settlement limit. It is at a higher level than the lands to the east and reads as part of the housing estate. The boundaries are defined by a mixture of hedging, mature trees and fencing. We cannot support an argument that the objection should fail just because the site is within LVRP. We must consider whether it should be within the SDL; there was no objection to its inclusion within the Park. The RDS directions used as a reason to reject the objection are not relevant because Lisburn is a favoured direction in the RDS and the site is already developed.

The open space lands to the south are included in the settlement limit despite the fact that they are also to the east of the road. We consider that the site represents small scale rounding-off of the limit. There will be no impact on the character of the area as the site is already developed. The fact that it is already built up should have led to its inclusion anyway given its location.
Recommendation

We recommend that the apartment blocks and garages east of Huguenot Drive are included within the SDL.

Lands at Lisnatrunk
(Objection 3462)

The site adjoins the SDL at Meetinghouse Lane, north of the Hillhall Road. The site is divided into sections by lanes traversing it; the largest of which is Church Lane. The parties agreed that the field north of Church Lane is prominent and that there should be no development thereon. We do not consider that the site is a notch in the development limit. Development would extend Lisburn City into the countryside. The character of the area and the site remains very rural, despite several new dwellings on and near the site. Changes to agricultural businesses cannot be used as a means to challenge the settlement limit because they are not site specific issues. Sites must be assessed on their merits and characteristics at the time without speculation on future changes in agricultural businesses. The current limit is defined by a long established residential area and a road with a wide verge and hedges and trees to the east. Beyond this to the north it is defined by open space and trees along the river. We consider that this is a perfectly logical SDL. The southern portion of the site is not particularly prominent. The eastern boundary of the field south of Church Lane is not defined by vegetation. There is a new dwelling under construction in the southern part of the site.

The process of accommodating the housing need for the district involves assessing the optimum locations for expansion of settlements. There is no objection to LVRP in this case, so the site will remain part of the Park. The housing need for Lisburn can be accommodated elsewhere without significant expansion into LVRP. The site would not accommodate significant numbers of dwellings to meet the need in any event because the objectors agreed to exclude the northern field, provide low density development at 10 dwellings per hectare and major planting to define a new limit. The parties both agreed that the highest the site could score was a category H on the Department’s matrix scoring system. There are preferable sites to meet Lisburn’s housing needs and we do not consider that the site is required. We recommend no change to the Plan as a result of this objection.

North of Hillhall Road, Plantation
(Objection 2140)

That part of 2140 north of Hillhall Road lies within LVRP. The extension of LVRP in this area is not the subject of any objection. At the Inquiry the agents indicated that the three small fields adjacent to the M1 were excluded from the objection. The Department accepted that two small fields at the western end of the site that are currently occupied by a scrapyard could be brought within the settlement limit without prejudice to the LVRP. We see no value in excluding the small field between the scrapyard and the M1 from the settlement limit. There is no physical boundary on the ground and a good hedge and trees to the NE. This leaves a single field adjacent to the Hillhall Road that is in dispute. The objectors wished to see that field simply brought within the development limit. They acknowledged that it would remain within LVRP.
This situation is not unique and the provisions of Policy COU 15 would apply. There is a strong boundary to the east of the scrapyard. The field slopes down from Hillhall Road. The south-western quarter of the field is occupied by an existing dwelling surrounded by high conifers.

A great deal was made of an alleged mistake in the Commissioner’s report on Lisburn Area Plan (LAP). The objection site was identified in the appendices to the report on the LAP and we can detect no error without further information such as the plan accompanying the objection. We were not supplied with the site plan in connection with the subsequent dismissed planning appeal either. We fail to see the relevance of that matter to the current objection, which must be considered on its own merits. The circumstances have changed in that the site is now within LVRP. We see no reason to include this field in the development limit. The boundary to the scrapyard site as discussed above provides a logical, well-defined settlement limit running to the M1. We consider that the Hillhall Road separates the site from the conceded lands on the opposite side (see Lisburn volume of this report – Plantation area). We note that the field’s eastern boundary does not align with the conceded lands in any event. The field provides a transition from the countryside to the edge of Lisburn. Even the low density development that may have been acceptable in view of the site’s location in LVRP would erode this transition from rural to urban. We cannot therefore recommend that this field be included within the development limit.

**Recommendation**

We recommend that the lands marked on Plan 4 be included within the settlement limit.

**75/81 Hillsborough Road, Lisburn**  
(Objection 3558/5)

The site is a recently re-developed petrol station incorporating a large Spar store along the northern part of the site and a fish and chip shop in the southern portion. There is a path to the north of the site leading to the river. Some landscaping has been provided to the rear of the petrol station within the site. The remainder of the path area is attractively vegetated. The Park in this location consists of a narrow projection terminating at the objection site. The Department stated that the road frontage has been planted with trees. This is no longer the case, as the site has been re-developed and the Spar building is in close proximity to the path. We see little value in the inclusion of a petrol station in LVRP. The location of the site on the extreme periphery of LVRP means that it can be excluded. We agree with the Department that the lands to the rear are attractive and should remain in the Park. We would recommend that the boundary of the Park is amended to exclude the petrol station. This will require survey work because the plans submitted with the objection do not show the re-developed petrol station site.

**Recommendation**

We recommend that the boundary of the Park is amended to exclude the petrol station site i.e. the shops, forecourt and parking areas.
OBJECTIONS SEEKING THE INCLUSION OF ADDITIONAL LAND WITHIN LVRP

Lands at Blaris – Zoning LC 37
(Objections 2022 & 2334)

Lisburn City Council sought the extension of LVRP on lands to the west of Union Locks. This was to include the open space designation in the Plan (LC 37) and the countryside to the west as far as Long Kesh LLPA (LH 02). At the inquiry the objector confirmed that no extension beyond the SDL was sought.

We have recommended that Zoning LC 07 should remain as a major employment zoning and that the open space zoning LC 37 and LLPA designation LC 21 should be retained in the Plan. The boundary of LLPA LC 21 was agreed at the inquiry and we have endorsed these changes. We have recommended that the boundaries of the open space and LLPA should coincide. The Department and EHS (now NIEA) surprisingly changed their opinion on the extension of LVRP into this site from negative to positive at the Inquiry. This appeared to be on the basis of the then agreed mixed use proposals for the overall site. Discussion then focussed on whether the LLPA boundary or a wider swathe of land should be included. We have recommended that the Zoning should remain for employment and therefore shall consider this extension to the Park afresh.

The analysis provided by NIEA in the Department’s written statement of case explains that the NIEA assessed these lands and concluded that the river valley corridor in west Lisburn is distant from the city and has an open river corridor landscape with no features of regional interest. We agree that there is a change in character of the river valley to the west of the current limit of the Park. We consider that the Union Locks provide a logical end point and gateway into the Park – as stated by LVRPAC in relation to their request for a node to be designated at this point. The towpath along the river ends at this point and the public right of way terminates at Blaris Road via a footbridge and a path alongside Union Locks. The suggested lands within the SDL would be protected from development by their designation as open space and the fact that they lie within the floodplain. The council’s aspirations for a linear riverside park would not be affected by the LVRP issue one way or the other. The land is currently in agricultural use and there is no suggestion of development affecting the river corridor. The proposed use of the site for employment purposes rather than as a mixed residential/employment use is also a factor in our consideration of this objection. The Maze site is a long term strategic reserve and we see no necessity for its connection to LVRP. We note that the Lagan Valley AONB boundary actually aligns with the eastern edge of Lisburn City. In all these circumstances we consider that the Park should not be extended to include these lands. It therefore follows that the Council’s objections seeking any additional nodes in the area must also fail. We recommend no change to the Plan as a result of these objections.

Lands at Mc Kinstry Road
(Objection 2334)

LVRPAC recommended that the Park boundary should be extended on the north west side of the railway line at Lambeg to include the lands within Designation LC 24 McKinstry Road LLPA. We consider that the railway line, embankment and extensive
mature trees provide a very strong and clear boundary for the Park at this point. The site is some distance from the River Lagan in an area of differing character. The objection site contains allotments and a public park, then a major road with open fields beyond. The lands are part of a RLW and so are protected by that designation. We recommend no change to the Plan in response to this objection.

COMMUNITY GREENWAYS

Designation LC 39 – Community Greenways, Lisburn City

LC 39/03 – Friends School to Millbrook to LVRP (Objection 2022/58)
LC 39/04 – Friends School to LVRP (Objection 2022/57)

This report appears in the Lisburn Volume of our report. We repeat it here as some of the route is within LVRP.

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

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

Recommendation

We recommend that the additional greenway through Wallace Park to Millbrook is included in the Plan as part of LC 39/03. LC 39/04 should follow one side of the River Lagan through Millbrook and the two most easterly circles should be deleted from the Plan.
Designation ML 24 – Community Greenways Metropolitan Lisburn

Designation ML 24/02 – LVRP to Belfast Hills (Objections 2022/60 & 2334)

We were not assisted by the Departmental statements because they did not address the issue of extending the route of the Community Greenway at all, despite the fact that the suggested amendments to the route were included in the original objection. The Council’s suggestion that the route should link to the Lagan towpath rather than merely ending on private land adjacent to the river on the opposite side is a good one. Notwithstanding the fact that Community Greenways link the urban area to the countryside, it makes sense for the route to link to something as a starting point and where better than the towpath. As the Council point out there is a footbridge across the River and canal at Seymour Hill estate to the south of the line shown on Map 3/001. This footbridge would provide direct access to the towpath and LVRP Node LN 11 – Ballyskeagh. The Council indicate that the existing footpath network in the area could be used to link to the footbridge. We were not provided with a plan of the proposed route and therefore recommend that the Department follow the Council’s suggestion and amend the routes as generally indicated.

LVRPAC appeared to be supportive of a similar starting point at the footbridge and Ballyskeagh. They suggested an alternative route through Seymour Hill Estate using Oak Tree Walk to access Derriaghy Glen Linear Park and so onto Kingsway. No details of this route were supplied and we cannot find such a street on any map. It would be preferable to utilise an alternative to the route traversing Seymour Hill Industrial Estate as is shown on Map 3/001, which also does not exist at the moment.

Recommendation

We recommend that Designation ML 24/02 is amended as outlined in the Lisburn City Council objection and an alternative route to Derriaghy Glen Linear Park onto Kingsway is investigated.

LISBURN CITY CENTRE – DEVELOPMENT OPPORTUNITY SITES

Zoning LC 53 – Laganbank Retail Park, Laganbank Road
(Objection 2022)

This objection from Lisburn City Council raised similar issues regarding the key site requirements and the River Lagan as discussed in the Lisburn volume of our report under Zoning LC 52, with the exception that a footbridge was not suggested. We had no statement of case from the Department, as they did not include the objection in the database. In the light of their concession for Zoning LC 52, we consider that a similar key site requirement would address the issue in this case and recommend accordingly. The Department may wish to consider our comments on the existing key site requirements for Zoning LC 52, which would apply equally to this site.

Recommendation

We recommend that the following key site requirement is added to the list in Zoning LC 53:

2005/D002 Lagan Valley Regional Park
• A concept statement to facilitate the comprehensive development of the site shall be submitted to and agreed with Planning Service. The submitted concept statement shall address the relationship of the development with the River Lagan.
VILLAGES

DRUMBEG

OBJECTIONS TO THE SETTLEMENT DEVELOPMENT LIMIT

Overall SDL
(Objection 2518)

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

Lands at 127 Ballyskeagh Road
(Objection 3465)

This site is very well screened from the road and contains a former dwelling on its western boundary that can barely be seen amongst the vegetation around the site. We have concluded that there is no need for additional land to be included within the SDL of Drumbeg. Inclusion of the site would not represent rounding off of the limit, but rather would extend it into the countryside. There are several dwellings to the west of the site that are set back and are barely perceptible when travelling along the road. Linking them to the settlement is not therefore necessary. It is common for dwellings to be replaced and the 2003 approval for a replacement on this site does not alter our conclusions. The presence of a former dwelling does not make this site brownfield land as such sites have been excluded from the definition. In any event brownfield land must be within an urban area. The site presents a pleasant rural character at the moment and inclusion within the SDL is not necessary to “improve” its overgrown appearance. The site is not in the type of sustainable location favoured by the RDS and the presence of a bus stop nearby does not alter this. We recommend no change to the Plan.

Land South of St. Patrick’s Church, Drumbeg Road
(Objections 242 and 1594)

The objection sought the inclusion of the site within the SDL in order to facilitate the construction of a new church hall to serve the community. Originally residential development was also sought on the site. This was changed at the Inquiry to the possibility of two dwellings (a rectory and a caretaker’s house) along with the hall. The basis for the objection was that the current church hall on the opposite side of Drumbeg Road is not large enough to accommodate the needs of the community. There is a lack
of car parking at the Hall. The case for a new hall was supported by Drumbeg Residents’ Association, who submitted their own objection on the matter and attended the Inquiry. It was claimed that this would be a vital community facility to replace the existing hall, which cannot meet the needs of the expanded village. The architect’s evidence that it was not feasible to extend the existing hall or add another storey because of the impact on the Church was not refuted by the Department.

We have concluded in Part 1 of our report that the settlement limits of villages should be strictly controlled. The site is reasonably large and would not represent small scale rounding off or infill of a small gap. It reads as quite separate from the Church and graveyard and appears as part of the countryside. We would recommend that the site remains outside the SDL, if housing development alone was proposed on the site. We must now consider the exceptional circumstances that were advanced in support of the objection.

We agree that a new hall could be a valuable community facility. The Department’s suggestion that the site of the former Charley Memorial School (now closed and boarded up) was suitable for a new hall was dismissed by the objectors. We do not agree that it can be so dismissed, as no efforts had been made to evaluate its suitability or acquire the site. We were told that the land would revert to the family who donated it in the first place. Nothing appears to have taken place on the site since closure and we have no information as to the owner’s actual intentions. In the event that this option is not realistic, the question would then be whether a new hall would have to be within the SDL. The objectors had submitted an application in 2005, when the site was outside the SDL. We are aware of other settlements where such facilities have been provided outside the limit. PPS21 provides for community facilities in the countryside where an exceptional need can be demonstrated, as was the case with previous Green Belt policy.

There is also an objection to LLPA DG 05, which covers an extensive area to the east of Drumbeg Road, including the Church. However, at the Inquiry the agent stated that the objector was not arguing that the LLPA should be removed. The objectors stated that the land was not agricultural, but part of the parkland setting of the church and village. The site is a small part of the LLPA and development is not precluded. The issues of impact on the listed building and the LLPA could be assessed as part of the consideration of a planning application. The relative importance of and impact of the proposal on views of the church can be considered in that context.

The original rectory for the church was sold off many years ago. The current rectory is one of the dwellings to the south of the church, which lie within 200m or so. We see no need for a new rectory to be provided on the site. No case to substantiate the need for a caretaker’s dwelling was advanced. The desire to have all church facilities on one site would have to be assessed against the impact of further development on the Park and LLPA.

Our conclusion is that the site should remain outside the SDL as there are some doubts regarding the availability of sites within the existing limit and because a new church hall could be pursued on a site adjoining the SDL. The scale of the site proposed is too extensive to accommodate only the proposed development. If included within the SDL residential development could be pursued on the remainder of the land. This could
have implications for our conclusions on further residential development in villages. We recommend no change to the Plan.

Land west of Gowan Meadows
(Objection 3171)

The site is accessed via Rosevale Gardens and thereafter proposes to utilise a gap between two dwellings at the southern end of Gowan Meadows (DG 02/02 – which is now virtually complete). Notwithstanding the agreement of the parties that the site could only accommodate 10 dwellings because of the category of the access, we propose to assess the site on the basis of its area of over 3 hectares on the basis that increased density could be argued if the site were to be included in the SDL. This is because access constraints can often be overcame and the site access only involves a short straight stretch within Gowan Meadows. A very low density development would also be an inefficient use of land, which would be contrary to sustainable development principles.

The site is relatively flat and a bank has been created along the southern boundary. The site falls steeply to the western boundary which is defined by a stream. The northern field is at a higher level and there is development visible beyond. Notwithstanding the environmental sensitivity of much of the area surrounding Drumbeg, we find that this particular site could have been acceptable if additional land was required for the village. However, we have concluded strategically that there should not be any additional land included within the SDL for Drumbeg. The development of the site would represent a large scale extension to the settlement limit and is therefore not acceptable. Even 10 additional dwellings are not required to meet the needs of the village. We recommend no change to the Plan.

Lands at Ballyskeagh Road
(Objections 2774 and 2956)

These objections sought the inclusion of the lands between the two parts of Drumbeg in the SDL. Objection 2774 related to the provision of housing and neighbourhood facilities. It also included land that it is already within the SDL as a Housing LUPA. We have concluded strategically that there should not be any additional land included within the SDL for Drumbeg. The site extends to some 16 hectares, although objection site 2774 is smaller. Although linking the two parts of the settlement could in principle be viewed as consolidation, the areas of land involved are too large to be suitable for inclusion within the SDL in view of Drumbeg’s position within the settlement hierarchy. The fields nearest the roads are open and quite prominent. Development would result in urban sprawl eroding the gap between the two nuclei that make up Drumbeg village. Some of the proposed neighbourhood facilities would be a requirement of regional policy and the offer of their provision would not outweigh our conclusions on this site. This scale of development is not required in Drumbeg and the fact that there is some public transport provision does not alter this fact. We recommend no change to the Plan.
Lands at Sandyhill
(Objection 817)

The site comprises two portions of land. The first is a long field (5.74 ha.) projecting south from Greenvale/Sandyhill alongside the M1. The second is a small field on the other side of the motorway. This portion is remote from the SDL of both Drumbeg and Ballyskeagh and it would be completely illogical to include within the settlement limit of either. The other portion is too large for the needs of the village. Development of this portion would represent sprawl of the settlement in a peninsular fashion and would not be acceptable in terms of urban form. The development would also be very prominent in views from the M1. The development would also be detrimental to the character of Lagan Valley Regional Park. The fact that there are no other environmental designations on the site and that the village is served by public transport do not outweigh our conclusions on this site. We recommend no change to the Plan.

OBJECTIONS TO DESIGNATIONS IN DRUMBEG

Designation 03/01 – Housing LUPA, Land SE of Zenda Park
(Objection 217/7)

The objection requested that a single storey restriction imposed on the site in Lisburn Area Plan 2001 should be applied to this designation. The Department supplied details of a full planning permission granted in 2008 for 15 dwellings, 11 of which were 2-storey. In the light of this planning permission, the restriction sought would not be feasible or practicable.

Designation DG 04 – Ballygowan Meadow SLNCI
(Objection 1348/5)

This objection from the South Eastern Education and Library Board refers to the fact that the site had been purchased for a new school to serve Drumbeg, Drumbo, Hillhall and Lambeg. Another location has been chosen for the school, but if planning permission is refused then this site would be required for the school. The objection did not rely on any nature conservation or scientific basis for opposing the designation. We therefore have no evidence to question the merit of the designation on which to recommend any change to the Plan.

Designation DG 07 – Drumbeg AVC
(Objection 2022/78)

We consider that this objection has been addressed by our strategic conclusions on Policy UE 3 in Part 1 of our report. We recommended that a detailed character analysis be undertaken and a design guide be produced for each AVC, which is what Lisburn City Council recommended. The Department may wish to re-consider the inclusion of Charley Memorial School in the list of interesting buildings as part of this process, due to the fact that it is now closed and could possibly be re-developed. For example, the
school was suggested as a potential village hall site by the Department in response to objection 242.

**Objection seeking the designation of an additional LVRP Node**  
(Objection 2022/84)

Lisburn City Council sought the designation of the car park adjacent to the Lagan as a node. We have commented on the Council’s Lagan Corridor Strategic Framework in Part 1 of our report. There is a node LVRP6 in Lady Dixon Park nearby on the other side of the river. The car park is within the SDL of Drumbeg and has already been provided together with signage and links to the towpath. We consider that there is no need for an additional node to be designated in these circumstances.

**SMALL SETTLEMENTS**

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

Elevate made objections to almost every small settlement development limit. We propose to deal with them generically in this section. We have recommended that the limits of small settlements are strictly controlled in Part 1 of our report. We cannot therefore agree with the argument that the settlement limits are too restrictive. We consider that the limits allow for sufficient growth in the context of small settlements being at the bottom of the settlement hierarchy. In any case as no specific amendments were suggested to settlement limits then these objections cannot result in any changes to these limits. The fact that future generations would have to out-migrate has to be balanced against the position of these settlements in the hierarchy and our strategic conclusions on their expansion in the light of RDS directions. The designation of LLPAs accords with the Plan Strategy and as development is not precluded within LLPAs then there is no need to extend development limits to compensate for them.

**BALLYAUGHLIS**

**Lands at Drumbeg Road**  
(Objection 3147)

The objection site is an approximately 1 hectare field at a lower level than the road, which is bounded by a mature high hedge. There is a new housing development to the south at a higher level than this site. The remaining boundaries are defined by low hedges and some trees. Ballyaughlish is very small in area and the inclusion of this site would result in significant expansion that would be well beyond small-scale rounding off or infill. The development would result in sprawl along Drumbeg Road. The inclusion of the site would be contrary to our strategic conclusions on the role of small settlements. We therefore recommend no change to the Plan as a result of this objection.
BALLYLESSON

Lands adjacent to Holy Trinity Church
(Objection 243)

The objection sought the inclusion of the site within the settlement limit for housing and possible service facilities for Park visitors. The site comprises some 6.4 hectares of undulating farmland. Ballylesson is a small settlement and the inclusion of this site would almost double the size of the settlement. This would be contrary to our strategic conclusions on small settlements (discussed above). The inclusion of the site would also result in urban sprawl to the detriment of the Lagan Valley Regional Park and the setting of the settlement. We consider that adequate provision is made elsewhere for visitors to the Park. The stream along the boundary of the site may form a better limit but this does not justify such large-scale expansion of this small settlement. We recommend no change to the Plan as a result of this objection.

BALLYSKEAGH

Lands at Sandy Lane
(Objections 262 and 292)

These objections relate to two large fields and a smaller field south of Ballyskeagh. The lands are remote from the settlement limit of Lisburn and it would be completely illogical to include them within that limit as the objections request, especially as the land in between is not the subject of objection. In the event that the objections meant to refer to Ballyskeagh SDL we shall address this aspect. The sites do not adjoin the Ballyskeagh settlement limit and so again it would be illogical to include them within its bounds. The sites are extensive and would result in large scale expansion of a small settlement within LVRP, contrary to our strategic conclusions on small settlements. The development of the sites would also be quite prominent in local views, including from the M1. We therefore recommend no change to the Plan.

Lands between Nevin’s Row and Sandymount
(Objection 426)

The site links the two parts of the defined settlement of Ballyskeagh and extends to the south. It contains a farm dwelling and outbuildings in the northern portion of the site. The inclusion of the site would almost double the size of the settlement, contrary to our strategic conclusions on small settlements. This is especially important in the context of the location within LVRP. We consider that the site and area is not urbanised, but consists of fields and a farm complex. The type of barns present are a common feature of the countryside and their removal and replacement with new dwellings would not represent such a planning gain as to outweigh our concerns with the site and objection proposals.

The objection also referred to the two LLPAs in Ballyskeagh. The objection was conditional on these designations proving to be an impediment to development. Development is not precluded within these designations, but we shall consider the objections in the event this does not address the concerns. The objection to BH 03 was
not supported by any case. The objectors stated that the locally important building (the
farmhouse on the site dating from the 1830s) could be retained and converted as part of
any development. In relation to BH 02 the Department has set out the reasons for
designation and the features of interest. The objectors’ case was simply that this was
not a particularly sensitive landscape. We have no evidence or basis to refute the
Department’s case and we agree with the identification of the combination of natural
and built heritage features that support the designations. We recommend that the Plan
is not changed as a result of this objection.

EDENDERRY

Lands at St. Ellen’s Industrial Estate
(Objection 3280)

We concluded in Part 1 of our report that there were no compelling strategic arguments
in favour of the inclusion of this site within the settlement limit for Edenderry. The
objectors confirmed that the aspects of the objection related to the designation of an
additional node and seeking a housing zoning on the site were not being pursued. The
Department considered that the site should be included within the settlement limit
because it benefitted from planning permission for a mixed use development granted in
2006 and part of the site has been developed for housing on the foot of a reserved
matters approval in 2003. At the time of our visit, the site had been cleared apart from a
two storey building and some domestic scale garages along the road frontage. New
dwellings have been constructed on lands to the north east. No other development
appears to have commenced.

We note that the site and the nearby St. Ellen Industrial Estate were both outside the
SDL in the Lagan Valley Regional Park Local Plan and Lisburn Area Plan. Technical
Supplement 11 – Countryside Assessment states that the SDL has been designated to
retain a compact form while including existing development commitments such as the
re-development of the St. Ellen Industrial Estate mill buildings. The development that
obtained planning permission appears to have related to the overall site and so the
construction of the dwellings would establish the commencement of development. The
Department was content that the site should be included on this basis. Notwithstanding
our strategic conclusions about the growth of the settlement, the particular
circumstances dictate that the site should be included within the settlement limit for
Edenderry.

Recommendation

We recommend that the site be included within the settlement limit for Edenderry.

Objection seeking the designation of an additional LVRP Node
(Objection 2022/84)

Lisburn City Council sought the provision of a small car park in the corner of the field
opposite St. Ellen Industrial Estate. We have commented on the Council’s Lagan
Corridor Strategic Framework in Part 1 of our report. We agree with the Department
that an additional node is not necessary at this location as facilities can be provided within the existing SDL.

**HILLHALL**

**Lands at Orr’s Lane**  
(Objection 708)

The site comprises agricultural land some distance north of the SDL. It is removed from the SDL, although it does abut another objection site. The site is quite open to views from the road and has low hedges to the northern and western boundaries. The development of the site would result in the large scale expansion of this small settlement contrary to our strategic conclusions on small settlements. Development would also result in urban sprawl along Orr’s Lane and would not rationalise the hamlet as claimed by the objector. We recommend no change to the Plan.

**Lands North of Hillhall Road**  
(Objections 891 and 979)

Objection 891 relates to the O’Kane Foods premises, which contains various factory and warehouse buildings. A small part of the site is within the SDL. Objection 979 appeared to relate to an extensive area around Hillhall, but it was clarified that the objection principally related to no. 23 Orr’s Lane and two dwellings on the opposite side of the lane.

We have concluded that no additional growth should be allocated to small settlements in Part 1 of our report. In this context, we cannot endorse the inclusion of either objection site within the SDL. For the avoidance of doubt, this would equally apply to the boundaries for the settlement originally suggested in objection 979 and in the related statement of case. We shall now consider the exceptional circumstances that were advanced to evaluate whether they outweigh these conclusions.

The O’Kane site does contain several large buildings. It is not an unusual to find such premises in the countryside in Northern Ireland. The business is still in operation from the site, which appears to be fully utilised. The visual impact of the buildings on the surrounding area is a consideration. The buildings are visible from views to the north along Orr’s Lane. The view is partly restricted by one large building on the northern boundary of the premises, which screens most of the others. Views from the Hillhall Road are more restricted due to the screening effect of the buildings in the settlement and some vegetation. The re-development of the site for residential purposes would result in a reduction in the visual impact of the buildings on the site. This must be weighed against our strategic conclusion that there should be no expansion in small settlements. We consider that the business appears to operate well in its current policy context and that the visual impact is not so severe as to warrant the inclusion of this large site within the SDL. There was no evidence of any statutory nuisance complaints from odours or traffic as a result of the close proximity of the business to adjoining dwellings. Similarly there were no accident statistics to support the objectors’ claims that the proposal would improve highway safety. We therefore conclude that any of the
planning gain arguments put forward do not outweigh our strategic conclusions on the role and expansion of small settlements.

The new dwelling at no. 23 sits at the northern end of the site and there is a substantial green area between the dwelling and the settlement limit. The SDL at this point is defined by a mature conifer hedge to the rear of the school. The site in the objector’s ownership is not built up and does not read as part of the settlement because of the open land between the dwelling and the settlement limit. We consider that the degree of separation and the scope for additional development on the remainder of the site means that the land in the objector’s ownership should remain outside the SDL. As we have concluded that the O’Kane premises should remain outside the SDL, the inclusion of the two dwellings opposite no. 23 would not be logical. They would be an isolated node divorced from the existing settlement limit. They are established dwellings with mature plots of the type common in the rural area. This site would result in a large scale expansion of this small settlement contrary to our strategic conclusions on small settlements.

Neither objector provided a reasoned case why LVRP should not have been extended to HillHall Road. The Plan identifies the additional lands included within the Park at p. 136 of Volume 1, where a brief explanation is provided. The consultation response refers to the contribution the lands north of Hillhall Road make to the landscape value and amenity of the Park. The addition of such a large area will inevitably result in the inclusion of premises that do not make a substantial contribution to or even have a detrimental impact on LVRP. The exclusion of either objection site would leave an illogical gap in the Park. We consider that the Hillhall Road provides a clear boundary in this area. We detect that this was not a critical issue for the objectors, who were focussed on their respective sites’ inclusion within the SDL.

LAMBEG

Objections related to Lambeg Mills, Lambeg
(Objections 2022/77 & 2022/84)

Lisburn City Council variously objected that Lambeg Mills should be included within the SDL for Lambeg and that the site should be designated as a Lagan Valley Regional Park Node. The Council accepted at the inquiry that the SDL for Lambeg shouldn’t be extended to include the site. A case was made for the site to be designated as a small settlement in its own right. We cannot consider this issue because it was not in the Council’s original objection. The only issue remaining for us to consider therefore is whether the site should be designated as a node.

We have commented on the Council’s Lagan Corridor Strategic Framework in Part 1 of our report. The basis for the objection was that this was a historic mill and as such was chosen by the Council as an appropriate location for one of their nodes. There are several old mill buildings in the Park. Some are in nodes and some are not; just as some are within the SDL and some are not. The mere presence of an old building does not mean that the site should be a node. In this case, one of the identified buildings is an old mill and the remainder of the site is occupied by new industrial buildings. There was no evidence of any discussions with the owners of the businesses on the site. We note that the Council Framework document suggests a new mill village on the site with
partial retention of the old building as a possibility. The RDS at p. 72 does not refer to this location as one of the “string of pearls” along the Lagan. The identified site contains only industrial buildings there are no dwellings within the site, which distinguishes it from the mill villages that have been designated as small settlements in the Plan. The existing mill cottages referred to by the Council are over 100m away from the objection site. The existing buildings are also well screened from the Ballyskeagh Road and the towpath. We therefore do not consider that their replacement would be such a positive improvement as to outweigh the negative effects of the proposal on the Park.

As we stated earlier, there is no explanation in the Plan of the basis for identification of nodes. We can only assume that there must be some logic in identifying existing facilities and attempting to provide an even spread of nodes through the Park. There is a designated node at Ballyskeagh a short distance to the east and the small settlement of Lambeg lies nearby to the west. We therefore see no justification for another node between the two in the countryside. There is currently no public access along the river bend in this area because the towpath follows the canal to the south east, cutting out the bend in the river where Lambeg Mills is situated. The public access indicated on the Council’s plan would be limited to between Lambeg Mills and Ballyskeagh to the east. We do not consider that this provision would outweigh our concerns particularly in view of the extensive footpath network that exists in the Ballyskeagh/Seymour Hill area. Access to the river and the towpath is available nearby and so the absence of a node will not prevent access as suggested by the Council. We recommend no change to the Plan.

TULLYNACROSS

Land North of Green Lane (Objection 711) and Land at Sandy Lane (Objection 709)

The sites adjoin the northern and southern parts of Tullynacross respectively. The inclusion of either or both sites within the SDL would not be acceptable in principle because of their size and location. Individually or cumulatively they would substantially increase the size of the settlement contrary to our strategic conclusions on small settlements. The fact that the adjoining development and topography screens the sites does not alter our conclusions. The lands were formerly in recreational use, which would be a sympathetic use to its status as part of LVRP. We recommend no change to the Plan.

NATURAL ENVIRONMENT

LLPA Designation TS 02– River and Canal

Former Coca-Cola Bottling Plant, The Green
(Objection 249)

Part of the site is within the above LLPA and Lambeg LLPA LG 02 Lagan Corridor. No evidence was provided to explain or support the basis for the objection. There is no information as to why this attractive wooded area along the banks of the River Lagan does not merit the designation.
The Department pointed out that a feature of interest had been omitted from the designation i.e. “Scheduled Monument – the Lagan Navigation”. The Department also referred to the overlap between the two LLPAs (TS 02 & LG 02) and stated that the error should be corrected.

**Recommendation**

We recommend that the bullet point related to the Lagan Navigation Scheduled Monument be added to the Designation and that the overlap between Designations TS 02 and LG 02 be corrected in the Plan.

**URBAN ENVIRONMENT**

**Objection to Areas of Village Character in Drumbeg, Edenderry and Lambeg**

(Objections 1469 and 2022)

There is no provision in regional policy for the designation of AVCs in small settlements. It is surprising therefore that Edenderry and Lambeg contain AVC Designations since both are small settlements. In the absence of specific argument about the principle of their designation, we shall consider the objections as submitted.

Although not classified by the Department, we note an objection to this Edenderry AVC within Lisburn City Council LVRP objections. We consider that this objection has been addressed by our strategic conclusions on Policy UE 3 in Part 1 of our report. We recommended that a detailed character analysis be undertaken and a design guide be produced for each AVC, which is what Lisburn City Council recommended. Objections in respect of Drumbeg and Lambeg also relate to Policy UE 3 and there are therefore no specific objections for us to consider in respect of these settlements either.

**COUNTRYSIDE**

**Objections to inclusion of Lands within Character Area E**

(Objections 265 and 448)

The objections relate to two areas of land that have been included in character area E (Agricultural and Heritage Interest) in Technical Supplement 11 – Countryside Assessment. The character areas are essentially descriptive and therefore the purpose of the challenge is unclear. The two sites together constitute almost all of the land between Drumbeg and the western edges of Ballylesson and Edenderry. The challenge was that the lands were suitable for golf courses and the classification as agricultural/heritage interest would stymie future proposals. The land is clearly in agricultural use and proposals for a golf course have not been implemented. The archaeological interest of the land would not be changed by including it in part of a different character area. The classification comes from the presence in the overall area of the Giant’s Ring and other monuments.

We are somewhat at a loss as to why these objections were entertained as they relate to the provisions of a technical supplement and are not objections to the Plan.
itself makes scant reference to the character areas. The sole reference is at page 138 of Volume 1 which states that the purpose of these character areas is to aid in the identification of appropriate uses in each of the designated park nodes. The Department considered that this was an error given that this amplification text relates to Policy COU 13, which deals with developments outside settlement limits and nodes. Notwithstanding this admission, we consider that the character areas are provided for information only and should not be used to assess proposals for development. The policy context is provided by Plan policies COU13, COU 14 and COU 15, together with regional policy. We recommend that all references to the character areas as a basis for decision making on planning applications are deleted from the Plan. This is especially important as there appears to be an error in this text anyway, as pointed out by the Department. We are content that character areas can be referred to for information as a description of the existing situation. In this context then the sites are in agricultural use at the moment and therefore have been correctly classified. The objectors acknowledge this fact. The merits of the lands as a golf course and the extent of their archaeological interest are matters for the development management process.

We note that the agent for objection 448 clarified that there was no objection to LLPA DG 05 despite the reference to it in the original objection. He was satisfied that golf courses and LLPAs are not incompatible.

**Recommendation**

We recommend that all references to the character areas as a basis for decision making on planning applications are deleted from the Plan.

**Objections seeking a Cemetery Zoning, Land south of Ballyskeagh**
(Objections 192 and 3489)

The Department withdrew Policy PU 1 and the associated Designation at Drumbeg from the Plan. We therefore consider that a proposal for a cemetery in the countryside can be assessed under regional policy and normal material considerations. Whilst it is true that regional policy does not specifically refer to a cemetery as an appropriate use in the countryside, PPS21 provides for outdoor sports and recreational uses, necessary community facilities to serve the local rural population and a range of other non-residential development that may be acceptable in principle in the countryside. PPS8 includes cemeteries within the definition of open space in Annex A. The Department indicated that the views of local councils were sought and these views provided the basis for the designations in the Plan (now withdrawn). There is no council support for this site as far as we know on the basis of the evidence supplied. The withdrawal of Designation LN 10 and Policy PU 1 by the Department is an acknowledgement that there is no need for cemeteries to be designated in the countryside. We do not interpret it to constitute support for cemeteries in other locations. We make no further comment on the merits of the site or the results of the objectors’ site investigations as these matters are being pursued as part of a planning application.

The Department recommended changes to the boundaries of SLNCI LN 01/39 – Lambeg East, which we endorse. We were informed at the inquiry that these revisions addressed the objectors’ concerns in that regard.
Recommendation

We recommend that the boundaries of SLNCI LN 01/39 – Lambeg East are amended as shown on Plan 5.

Policy OS2 – Omission of any Reference to Lagan Towpath
(Objection 2022/81)

Lisburn City Council objected to the omission of the Lagan Towpath as a Community Greenway from Policy OS2. They stated that the towpath acts as a strategic greenway linking Belfast Castlereagh and Lisburn. Policy OS2 does not list Community Greenways and so we are unsure what the objection seeks to achieve. In the event that it does seek the designation of the towpath as a Community Greenway (as the objection is classified by the Department) we shall address this issue. The purpose of Community Greenways is to link the countryside and urban areas of open space. Policy OS2 refers to the courses of rivers offering particular potential for the development of Community Greenways. The towpath does partly run through urban areas but predominantly traverses the countryside. It does not therefore meet the basic purpose of Community Greenways as set out in the Plan. We recommend no change to the Plan.
## APPENDIX 1 – PLANS

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Belfast Metropolitan Area Plan 2015 - Public Inquiry

PLAN 4
Objection 2141
SDL Hillhall Road, Lisburn

Area to be included within SDL
Belfast Metropolitan Area Plan 2015 - Draft Plan
Map No. 46/039 - Lambeg East Site of Local Nature Conservation Importance and Area of Constraint on Mineral Developments

- Settlement Development Limit
- Site of Local Nature Conservation Importance and Area of Constraint on Mineral Developments

PLAN 5
Objection 3489
Lambeg East
SLNCI: LN 01/39

/// Areas to be excluded from SLNCI