

**THE DEPARTMENTAL APPROACH TO THE
DISTRIBUTION OF HOUSING GROWTH POTENTIAL IN
THE BELFAST METROPOLITAN AREA AND BELFAST
METROPOLITAN AREA HINTERLAND. JUNE 2007**

CONTENTS

Preamble

- 1.0 Introduction
- 2.0 Background

Section 1 Metropolitan Urban Area

- 3.0 The Approach to the Distribution of Housing Growth Potential in the Metropolitan Urban Area
- 4.0 Strategic Factors to be taken into Consideration in the Distribution of Future Housing Growth Potential
- 5.0 Site Specific Factors to be taken into Consideration in the Location of Future Housing Growth Potential
- 6.0 Assessment of Site Specific Objections
- 7.0 Potential Yield
- 8.0 Phasing
- 9.0 Concluding Summary

Section 2 Metropolitan Rural Area

- 10.0 The Approach to the Distribution of Housing Growth Potential in the Metropolitan Rural Area
- 11.0 Factors to be taken into Consideration in the Allocation of Future Housing Growth Potential
- 12.0 Revised Allocation
- 13.0 Site Specific Factors to be taken into Consideration in the Location of Future Housing Growth Potential
- 14.0 Assessment of Site Specific Objections
- 15.0 Potential Yield
- 16.0 Phasing
- 17.0 Concluding Summary

PREAMBLE

This paper should be read in conjunction with the Department's earlier approach paper (Adjusted 9 January 2007) which is available on the Department's website. In the interests of clarity large scale text repetition often is unavoidable although where appropriate a reference back to the earlier paper is included. This paper therefore expands the detailed approach as required and changes or supplements the original text as considered necessary.

1.0 INTRODUCTION

- 1.1 On 9 January 2007 the Department placed a paper on its website regarding its approach to the Adjusted Housing Growth Indicators for the Belfast Metropolitan Area and Belfast Metropolitan Area Hinterland.
- 1.2 The contents of the paper were discussed at Stage 1 of the Public Inquiry into the Draft Belfast Metropolitan Area Plan 2015 (The Public Inquiry) where it was agreed the Department would set out its proposals for the distribution of housing growth potential by the end of June 2007 for further discussion at a later session at The Public Inquiry.
- 1.3 This paper sets out the Department's proposals for the distribution of housing growth potential taking into account matters that were raised at Stage 1 of The Public Inquiry including the overall level of housing growth potential and the factors to be used to assess both strategic distribution and site specific aspects.

2.0 BACKGROUND

- 2.1 HGI 4 in the Regional Development Strategy (RDS) deals with the housing allocation to the Belfast Metropolitan Area and its hinterland. Figure 18 in the RDS sets out the Housing Growth Indicators (HGIs) for the BMA – 42,000, the BMA Rural Hinterland – 9,000 and the BMA Districts Hinterland – 26,500. The HGIs cover the period from the beginning of January 1999 to the end of December 2015. The BMA and the BMA Rural Hinterland make up the Plan Area of the Draft Belfast Metropolitan Area Plan 2015 (BMAP).
- 2.2 Figure 18 in the RDS also sets out the component parts which make up the BMA and the BMA rural hinterland. In order to avoid confusion of

terminology the BMA is referred to in BMAP as the Metropolitan Urban Area and the BMA Rural Hinterland as the Metropolitan Rural Area.

- 2.3 The Metropolitan Urban Area is defined for purposes of allocating the 42,000 dwellings as the continuous built up area centred on Belfast and extending in an arc from Jordanstown to Knocknagoney, together with the City of Lisburn, and the towns of Bangor, Carrickfergus and Holywood.
- 2.4 The continuous built up area includes the city of Belfast and adjoining built up parts of the Districts of Carrickfergus, Castlereagh, Lisburn, Newtownabbey and North Down. These built up areas outside of Belfast are referred to as Metropolitan Areas.
- 2.5 The Metropolitan Rural Area is defined for purposes of allocating the 9,000 dwellings as those parts of the Plan Area lying outside the Metropolitan Urban Area.
- 2.6 The potential housing yield in BMAP for the Metropolitan Urban Area is 51,800, some 23% over the RDS HGI and 10,700 for the Metropolitan Rural Area, some 19% over the RDS HGI. BMAP was formulated and received a certificate of general conformity on the basis of the HGIs in the RDS.
- 2.7 In January 2005 The Department for Regional Development (DRD) published a Review of the Regional Housing Growth Indicators for public consultation. Following receipt of comments a Public Examination was held to examine the methodology used to calculate the figures in the document and the adequacy of the allocation of the figure through the draft HGIs. The Report of the Panel on the Review of Housing Growth Indicators was produced in March 2006. The recommendations included that the Adjusted total HGI for the BMA and BMA Rural Hinterland should be 66,500, an increase of 15,500 over the RDS HGI of 51,000.

2.8 In the Response by DRD to the Report of the Panel published in June 2006 the above recommendation was accepted. Table 1 of the Response provides a breakdown of the HGI into 54,800 for the BMA (Metropolitan Urban Area) and 11,700 for the BMA Rural Hinterland (Metropolitan Rural Area).

2.9 Table 1 summarises the RDS HGI, the potential housing yield in BMAP and the Adjusted HGI. As discussed at Stage 1 of The Public Inquiry the Department considers it appropriate to allow for flexibility around the Adjusted HGI which would amount approximately to a further three year supply of housing land based on a pro rata uplift of the Adjusted HGI figures. The fourth column of Table 1 gives figures which relate to an additional three year pro rata increase of the Adjusted HGIs ('additional three year supply flexibility').

Table 1 HGI figures and potential housing yield in BMAP

	RDS HGI	Potential yield in BMAP	Adjusted HGI	3 year pro rata uplift
Metropolitan Urban Area	42,000	51,828	54,800	64,500
Metropolitan Rural Area	9,000	10,646	11,700	13,800
Total	51,000	62,474	66,500	78,300

2.10 Section 1 of this paper sets out the Department's proposals for the distribution of housing growth potential in the Metropolitan Urban Area and Section 2 sets out proposals for the Metropolitan Rural Area. The distribution is based on the pro rata uplifted figures in the final column of Table 1. Appendices 1 to 4 contain an assessment of all relevant objection sites to allow judgements to be made against all levels of housing growth put forward during Stage 1 of The Public Inquiry.

SECTION 1

3.0 THE APPROACH TO THE DISTRIBUTION OF HOUSING GROWTH POTENTIAL IN THE METROPOLITAN URBAN AREA

3.1 As set out in the January 2007 paper the Department considers it appropriate to up-date the housing figures supplied in the Population and Housing Technical Supplement to take account of planning permissions granted since March 2003. Table 2 of the January 2007 paper is re-stated at Table 2 below which provides figures for the overall potential yield in each of the component parts of the Metropolitan Urban Area taking account of the 2006 Housing Land Availability Survey undertaken by the Department. Additional yield arising from development of sites outside of the urban footprints and not taken account of in BMAP is included in the updated figures.

3.2 As discussed at Stage 1 of the Public Inquiry it is not considered appropriate to carry out the following:

- A further urban capacity study;
- An adjustment of the minimum and maximum densities on zoned sites in BMAP;
- A re-examination of all the remaining industrial land which is not the subject of objection with a view to re-zoning as housing;
- A further full housing needs assessment;
- A re-assessment of environmental designations including those which include BUAP Whitelands; and
- A further windfall assessment.

The RDS and phasing are matters which are addressed later in this paper.

3.3 The Department considers that any additional yield arising from successful objections to BMAP within the proposed settlement development limits may be a factor to be taken into account in the

determination of the amount of additional land to be brought forward to meet the Adjusted HGI. This would particularly be the case where the level of additional potential yield arising from this is considered to be significant.

Table 2 Potential Housing Yield in the Metropolitan Urban Area

	Potential yield in BMAP	2006 potential yield
Belfast District		
Belfast City Centre	2466	2870
Belfast Harbour Lands	3500	3500
North Belfast	3459	4552
West Belfast	4540	5311
South Belfast	3053	4271
East Belfast	3465	4526
District Total	20483	25030
Carrickfergus District		
Carrickfergus	3516	3755
District Total	3516	3755
Castlereagh District		
Metropolitan Castlereagh	3565	4044
District Total	3565	4044
Lisburn District		
Lisburn City Centre	118	119
Lisburn City	5357	5886
Metropolitan Lisburn	2435	2694
District Total	7910	8699
Newtownabbey District		
Metropolitan Newtownabbey	4740	5509
District Total	4740	5509
North Down District		
Bangor	4472	4899
Holywood	411	472
District Total	4883	5371
Windfall	6731	178*
TOTAL	51828	52586

* This is the residual uncommitted windfall total. Windfall development granted planning permission since March 2003 is included in figures in rows above

3.4 The Concluding Summary (Section 8.0) of the January 2007 paper identified the following key strategic factors associated with the distribution of housing growth potential in the Metropolitan Urban Area:

- The potential housing yield at 2006 is only 4% lower than Adjusted HGI due to the yield from committed housing sites and windfall development.
- The opportunity to better meet other RDS housing growth related strategic directions to some appropriate extent but with the need to balance this against any further over-provision that may be the likely result.
- The establishment of criteria (factors) to allow a revised future housing growth assessment at both strategic and site specific levels.
- The complexity of the various factors that can determine the ultimate extent of new housing land zonings in the Metropolitan Urban Area.

Following on from the discussion at Stage I of The Public Inquiry it is considered that two further factors of relevance are:

- The sequential approach to distributing housing growth potential across the Metropolitan Urban Area.
- The Department considers it appropriate to allow for flexibility around the Adjusted HGI up to a level of approximately 64,500 to take account of the 'additional three year supply flexibility'.

3.5 The approach to the distribution of housing growth in the Metropolitan Urban Area builds on the January 2007 paper and is set out in this section as follows:

- Strategic factors to be taken into consideration in the distribution of future housing growth potential.

- Site Specific Factors to be taken into consideration in the distribution of future housing growth potential.
- Assessment of site specific objections against the above factors.
- Potential yield
- Phasing.
- Concluding Summary.

4.0 STRATEGIC FACTORS TO BE TAKEN INTO CONSIDERATION IN THE DISTRIBUTION OF FUTURE HOUSING GROWTH POTENTIAL

4.1 The allocation process in BMAP for the Metropolitan Urban Area followed the sequential approach as set out in the RDS. It is considered the approach to identifying land for the distribution of housing growth potential to take account of the Adjusted HGI should follow the same sequence.

4.2 The RDS refers to maintaining a tension between the amount of housing within urban footprints and Greenfield sites and maximising the amount of housing within urban footprints. It is considered BMAP achieved an appropriate balance between urban capacity sites and Greenfield sites and that potential housing zoning within the urban footprints is maximised.

4.3 Consequently it is considered that additional land for housing in response to the Adjusted HGI will be located principally on Greenfield sites beyond the settlement development limits in BMAP.

4.4 It is considered that in the context of the Metropolitan Urban Area it is inappropriate to make a strategic allocation to the various component parts. This is the approach adopted in BMAP. Many of the component parts do not constitute settlements but are suburban areas which play a complementary role. It is therefore considered more appropriate to

assess individual sites against both strategic factors, including guidance in the RDS, and site specific factors.

- 4.5 At Stage 1 of The Public Inquiry various levels of housing growth were discussed. In order to facilitate identification of the quantum of land to meet these various levels the assessment of sites against strategic and site specific factors includes a scoring system which allows judgements to be made between sites.
- 4.6 The strategic factors to be taken into account are set out below. The first factor, RDS directions, was considered to some extent as part of the BMAP allocation process. The remaining factors are ones which were not fully taken into account in the BMAP process but which it is now considered are relevant to any resulting opportunity for increased housing growth.

Strategic Factors

1. **RDS Directions.** Following on from Stage 1 of the Public Inquiry it is considered RDS directions should be the prime consideration in determining the location of additional land for housing and that it is appropriate to expand on the January 2007 paper in relation to this factor. The RDS gives a clear direction that Lisburn and Newtownabbey have potential for significant housing expansion due to their strategic location at the meeting point of Key Transport Corridors. Diagram 4 on page 45 of the RDS indicates the Key Transport Corridors. In Lisburn these are the M1 and A1 and in Newtownabbey the M2 and A8. Diagram 5 on page 62 of the RDS provides a broad indication that it is West Lisburn and North West Newtownabbey that are the locations for major planned expansion. BMAP was unable to give significant housing growth to these areas in view of the potential housing yield from other sources. It is considered that this strategic direction in the RDS should be sufficiently

recognised and that additional land at these locations for housing is needed. It is further considered these locations should provide the main focus for additional future housing growth and this direction in the RDS is the main consideration in determining the location of additional land for housing.

Following on from stage 1 of the Public Inquiry it is considered appropriate to expand on the RDS directions regarding housing growth to other locations in the Metropolitan Urban Area as follows:

Belfast: - focus development within existing urban footprints and protect and enhance the setting of the City.

Castlereagh Borough: - develop its complementary role and enhance its role as an attractive residential location whilst protecting its setting.

Newtownabbey Borough: - develop its complementary role.

Bangor: - develop the town and consolidate its role as an attractive residential location. Recognise its role as an important commuter settlement.

Carrickfergus: - Develop the town and recognise its role as a heritage town and important industrial and service centre with a strengthened housing role.

Lisburn: - Develop the town and recognise the high development potential of Lisburn.

Some housing growth will be acceptable in the above locations provided it is in accordance with the regional role and function of the various component parts.

Further to the January 2007 paper it is considered appropriate to highlight RDS directions regarding the protection of strategic environmental assets as follows:

Lagan Valley Regional Park: - conserve and enhance the strategic value of the Park.

Setting of the Metropolitan Area: - promote the conservation and wise management of the Belfast Hills and consider ways of conserving the regional resource value of the other Antrim, Holywood and Castlereagh Hills which provide the setting for the metropolitan area.

2. **Council Views.** Following on from Stage 1 of the Public Inquiry the Department considers the views of the Councils should be taken into account in the distribution of housing growth potential to the various component parts of the Metropolitan Urban Area. The views of the various Councils from the consultation process associated with the publication of BMAP are given below.

- Carrickfergus Borough Council - support the settlement development limits as shown in BMAP
- Newtownabbey Borough Council – do not identify any strategic direction for future growth
- North Down Borough Council – do not identify any strategic direction for future growth
- Castlereagh Borough Council – identify Dundonald as a strategic direction for future growth
- Lisburn City Council – identify Lisburn City as a strategic direction for future growth

- Belfast City Council – identify urban footprints as the strategic direction for future growth

3. **Social Housing.** Whilst the January 2007 paper did not indicate social housing as a strategic factor, following on from Stage 1 of the Public Inquiry it is now considered appropriate to address this matter. Table 3 provides figures relating to Unprogrammed social housing need in the Housing Needs Assessment updated to 2006. These indicate there is a need for social housing in all component parts of the Metropolitan Urban Area. It is therefore considered that this is not a distinguishing factor between the component parts and that this factor is better applied at the site specific level.

Table 3: Unprogrammed Social Housing Need in the Metropolitan Urban Area

Component Area	Unprogrammed Need 2004	Unprogrammed Need 2006
North Belfast	507	1987
South Belfast	471	1020
East Belfast	908	1132
Shankhill	0	142
West Belfast	416	3520
Carrickfergus Town	22	85
Castlereagh Urban	301	395
Lisburn City	214	1166
Dunmurry	88	(included in West Belfast)
Newtownabbey Urban	133	367
Bangor Town	347	805
Hollywood	197	209

4.7 With reference to matters raised at Stage 1 of the Public Inquiry the Department would comment as follows:

- The Department is unaware of any relevant direction or guidance on strategic urban design as referred to in paragraph 35 of Planning Policy Statement 12 (PPS12) – Housing in Settlements and has not therefore included this as a factor.
- Paragraph 35 of PPS12 identifies the ability to unlock strategic development opportunities a criterion for the identification of suitable sites. As the strategic directions for growth in the RDS cover all types of development it is considered factor 1 above adequately covers this issue and it is not necessary to include it as a separate factor in the distribution of housing growth potential.
- It is considered that in the context of the Metropolitan Urban Area the directions in the RDS outweigh any consideration regarding age of extant plans which should not therefore be a factor to be taken into account in the distribution of housing growth potential.
- It is considered the emphasis on the sequential approach in order to achieve sustainable development together with the focus on urban capacity sites in BMAP takes account of the need for efficiency in the use of land as referred to in paragraph 4 of Planning Policy Statement 1 – General Principles.
- It is considered that the relevant City/Borough/District Councils are representative of the community and there is no requirement to consult further with individual community groups regarding the distribution of housing growth potential.

5.0 SITE SPECIFIC FACTORS TO BE TAKEN INTO CONSIDERATION IN THE LOCATION OF FUTURE HOUSING GROWTH POTENTIAL

5.1 The Department has identified a number of factors to be used to assess the suitability of individual sites for future housing growth above that which is already accommodated for in BMAP.

5.2 The first two factors are considered to be determining obstacles to housing development suitability.

1. **Environmental designations.** Much of the land adjoining the settlement development limits in BMAP is the subject of proposed environmental designations which include:

- Areas of High Scenic Value
- Rural Landscape Wedges
- Sites of Local Nature Conservation Importance
- Local Landscape Policy Areas
- The Lagan Valley Regional Park
- The Coastal Area

The Department considers land which is the subject of one or more of the above environmental designations is not suitable for future housing growth.

2. **Constraints on development.** The Department has consulted with statutory consultees regarding roads, water and sewerage and drainage. Where the replies have indicated a constraint to development the site is considered to be not suitable for future housing growth.

3. **Site Analysis.** This factor, which is further to the January 2007 paper and reflects discussion at Stage 1 of the Public Inquiry,

relates to the characteristics of the site including topography and vegetation.

4. **Northern Ireland Electricity Power Lines.** This factor is further to the January 2007 paper and reflects discussion at Stage 1 of the Public Inquiry. Whilst the presence of power lines is not considered to be a total constraint to development an assessment has been made of the impact such power lines have on individual sites
5. **Compact Urban form.** Sites should result in a compact urban form and should not lead to an excessive amount of growth in any one direction. Sites which abut the settlement development limits in BMAP are normally considered preferable to those which do not abut the limit.
6. **Definition of Settlement Development Limits.** Where a settlement development limit in BMAP follows a well defined physical boundary including a major road, river or other physical feature then breach of that boundary to allow for growth will not be the preferred option if other sites that can more readily be absorbed into the urban form are available.
7. **Social Housing.** As the Department has been unable to distinguish between relevant objection sites against this factor all sites have been scored the same.
8. **Other Matters (comments).** This includes matters not addressed in the above factors and will include planning history, existing built form and other matters which the Department considers material to the assessment of individual sites. Some other matters may come to light during Stage 2 of The Public Inquiry.

6.0 ASSESSMENT OF SITE SPECIFIC OBJECTIONS

6.1 In order to assist the Public Inquiry process regarding the distribution and quantum of land which is considered suitable for housing development across the Metropolitan Urban Area the Department has assessed all relevant objection sites against the above strategic and site specific factors. A scoring system has been used against each factor as shown in Table 4.

Table 4 Scoring of Objection sites in the Metropolitan Urban Area

FACTOR		SCORE						
Strategic Factors								Unsuitable
1	RDS Directions	+2	+1	0	-1			X
2	Council Views		+1	0	-1			
Site Specific Factors								
3	Environmental Designations							X
4	Constraints on Development							X
5	Site Analysis			0	-1	-2		X
6	NIE Power lines			0	-1			
7	Compact Urban Form		+1	0	-1			X
8	Definition of Settlement Development Limit		+1	0	-1			X
9	Social Housing		+1	0	-1			
10	Other matters	+2	+1	0			A	X

6.2 The scoring system in Table 4 is as follows:

Factor 1. To reflect the directions in the RDS sites located in West Lisburn City and North West Metropolitan Newtownabbey are scored as +2. Sites in the remainder of Lisburn City and Metropolitan Newtownabbey together with those in Metropolitan Castlereagh, Bangor and Carrickfergus are scored as +1, unless the site is of such a scale that is considered to go beyond the RDS directions in which case a score of -1 is given. Sites in Metropolitan Belfast, Metropolitan Carrickfergus, Metropolitan Lisburn, Metropolitan North Down and Hollywood are scored as 0 to reflect a 'nil' strategic role. Additionally where sites are located within the Lagan Valley Regional Park or an Area of High Scenic Value they are scored as X (unsuitable).

Factor 2. Where a site is in a location identified by the relevant Council as being a strategic direction for future growth it is given a score of +1. Where a site is in a location where the relevant Council has not given any view it is given a score of 0. Where the relevant Council has indicated the settlement development limits in BMAP are appropriate then a site is given a score of -1.

Factor 3. Where a site lies within an environmental designation it is scored as X (unsuitable).

Factor 4. Where a consultation response identifies a constraint to development then a site is scored as X (unsuitable).

Factor 5. Where a site is flat, not visually prominent and contains no significant groups of trees then it is given a score of 0. Where a site is either sloping with some degree of visual prominence or where there are significant groups of trees it is given a score of -1. Where a site is either steeply sloping with a significant degree of visual prominence or is mainly covered by trees it is scored as -2. Where a site is steeply

sloping with a high degree of visual prominence and is considered unsuitable for development it is scored as X.

Factor 6. Where a site contains power lines which will not have any significant affect on development in terms of layout then it is scored as 0. Where it is considered the power lines will have a significant affect on achieving a suitable form of development then it is given a score of -1.

Factor 7. Where a site will lead to rounding off it is given a score of +1. Where a site goes beyond rounding off but does not result in considerable growth in any direction it is given a score of 0. Where a site will lead to considerable growth in any direction it is given a score of -1. Where a site will lead to excessive growth in any direction or is of a scale which is inappropriate in relation to the size of the settlement then it is considered unsuitable and given a score of X.

Factor 8. Where a site will result in a more strongly defined development limit it is given a score of +1. Where a site will lead to little or no difference in the definition of the settlement development limit it is given a score of 0. Where a site will result in a more weakly defined settlement development limit it is given a score of -1. Where a site does not abut the development limit it is not given a score against this factor.

Factor 9. As previously mentioned all sites are given a score of 0.

Factor 10. Where a site contains built form which is unsightly it is given a score of +2. Where a site contains built form which is visually acceptable it is given a score of +1. Where a site contains some built form which is insignificant in terms of the site a score of 0 is given. Where the site contains features which will preclude development it is scored as X (unsuitable). Where there is an extant planning permission for residential development a site may be scored as A.

- 6.3 Where an objection site is scored as unsuitable against any of the seven factors against which an unsuitable score is possible, then generally the site overall is considered unsuitable for development. However, where for a particular objection site it is considered positive RDS directions outweigh an unsuitable score against another factor, particularly compact urban form and development limit characteristics, then the unsuitable score against that factor is placed in brackets (X) in the Appendices and is set aside in the overall scoring. Exceptionally where 'other matters' are considered to be determining in favour of development then an objection site will be scored as 'A' against this factor and this will outweigh any other unsuitable scores for the site.
- 6.4 Objection sites which are not scored as unsuitable for development against any of the above factors have been placed in a category which reflects the overall scores against the ten factors. The Department considers there are two main methods of placing sites into categories as follows:
1. Adding the individual scores against each factor and basing the categories on the final scores.
 2. Basing the categories on the number of positive and negative scores against the individual factors.

The Department is of the opinion that both methods are acceptable but that the second method is preferable as it is a more 'in the round' approach. Furthermore not all objection sites have been scored against all the factors. A site is only scored against 'other factors' where there is a relevant comment. Sites which do not abut the development limit are not scored against Factor 8.

- 6.5 Where an objection site is deemed unsuitable for development against any factor, subject to the qualification in paragraph 6.3, and where

following discussion at Stage 2 of the Public Inquiry the unsuitability is considered unjustifiable, then the site will be placed in the appropriate category depending on its scorings against the ten factors.

6.6 The categories are as follows:

- Category A. Sites which score +2 against RDS directions and which have no negative scores. Sites which score 'A' against other factors.
- Category B. Sites which score +2 against RDS directions and which have one negative score.
- Category C. Sites which score +2 against RDS directions and which have two negative scores.
- Category D. Sites which score +2 against RDS directions and which have three negative scores.
- Category E. Sites which score +2 against RDS directions and which have four negative scores.
- Category F. Sites which score +2 against RDS directions and which have five negative scores.
- Category G. Sites which score +2 against RDS directions and which have six negative scores.
- Category H. Sites which score +1 against RDS directions and which have no negative scores.
- Category I. Sites which score +1 against RDS directions and which have one negative score.
- Category J. Sites which score +1 against RDS directions and which have two negative scores.
- Category K. Sites which score +1 against RDS directions and which have three negative scores.
- Category L. Sites which score +1 against RDS directions and which have four negative scores.
- Category M. Sites which score +1 against RDS directions and which have five negative scores.

- Category N. Sites which score +1 against RDS directions and which have six negative scores.
- Category P. Sites which score 0 against RDS directions and which have no negative scores.
- Category Q. Sites which score 0 against RDS directions and which have one negative score.
- Category R. Sites which score 0 against RDS directions and which have two negative scores.
- Category S. Sites which score 0 against RDS directions and which have three negative scores.
- Category T. Sites which score 0 against RDS directions and which have four negative scores.
- Category U. Sites which score 0 against RDS directions and which have five negative scores
- Category V. Sites which score 0 against RDS directions and which have six negative scores
- Category W. Sites which score -1 against the RDS directions and which have no other negative scores.
- Category Y. Sites which score -1 against the RDS directions and which have one other negative score.
- Category Z. Sites which score -1 against the RDS directions and which have two other negative scores.
- Category AZ. Sites which score -1 against the RDS directions and which have three negative scores.
- Category BZ. Sites which score -1 against the RDS directions and which have four other negative scores.
- Category CZ. Sites which score -1 against the RDS directions and which have five other negative scores.
- Category DZ. Sites which score -1 against the RDS directions and which have six other negative scores.

- 6.7 In bringing forward sites it is considered Category A sites are preferable to Category B and so on down to Category DZ.
- 6.8 Objection sites which do not abut any settlement development limit in BMAP are not generally included in this assessment. Where however there are other objection sites which lie between the settlement development limit and the objection site then it may be included in this assessment.
- 6.9 In order to assist the Public Inquiry process in determining which categories should be brought forward for development each category is assigned an acceptability index. An index of 1 indicates those categories which it is considered need to be brought forward to meet the 'three year supply flexibility figure' as put forward by the Department. An index of 2 indicates those categories which it is considered need to be brought forward to meet higher growth figures. Should it be considered necessary individual categories can be further refined. Following Stage 2 of the Public Inquiry sites currently with an acceptability index of 1 may be moved down to acceptability index 2 as a result of other objections resulting on other housing potential being placed in higher categories.
- 6.10 For the purposes of identifying the amount and distribution of land to meet the Adjusted HGI each site has been assigned a yield based on an average density of 25 per hectare. The density figure for individual objection sites may however be refined by key site requirements to be discussed at Stage 2 of the Public Inquiry. In order to avoid double counting where there are over-lapping sites, the potential yield on the smaller sites is placed in brackets in the Appendices and is not taken account of in the overall total.
- 6.11 Appendix 1 contains a summary of the scorings for all relevant objection sites. The final column gives the category and acceptability

index. Appendix 2 provides more detail against each objection site. The site reference in the first column of the Appendices refers to the BMAP objection number. The order of the factors in the Appendices differs from that in Table 4.

6.12 The Department has received an objection which lies outside the Plan Area in Ards District which is included for consideration in the context of BMAP. Apart from this the Department considers that in the Metropolitan Urban Area there are no alternative sites which are not the subject of objection which are more appropriate for housing.

7.0 POTENTIAL YIELD

7.1 Table 5 provides figures for the potential yield in the Metropolitan Urban Area. The figures in Column 5 take account of objection sites which the Department considers are suitable for meeting the Adjusted HGI against the Department's suggested 'additional three year supply flexibility' and which have an acceptability index of one.

7.2 The total potential yield in Column 5 of Table 5 is 1176 short of the 'additional three year supply flexibility' figure for the Metropolitan Urban Area in Table 1. This however could be off- set by potential housing yield from the following:

- Windfall including higher densities being achieved
- Successful objections within the settlement development limits regarding a change of zoning.

7.3 Furthermore potential yield to meet higher levels of housing growth potential than that proposed by the Department could also arise from successful objections on sites currently considered to be unsuitable.

This includes sites which are currently considered to be too large in terms of urban form but where, following discussion at Stage 2 of the Public Inquiry, a part only of the site may be determined as suitable

TABLE 5 – Potential Housing Yield in the Metropolitan Urban Area

1	2	3	4	5
District	Potential Yield in BMAP	2006 Potential Yield	Potential Yield from additional greenfield sites	Potential Yield
Belfast				
Belfast	20,483	25,030	0	25,030
Carrickfergus				
Carrickfergus	3516	3755	1023	4778
Castlereagh				
Metropolitan Castlereagh	3565	4044	2482	6526
Lisburn				
Lisburn City	5475	6005	3509	9514
Metropolitan Lisburn	2435	2694	0	2694
Total	7910	8699	3509	12,208
Newtownabbey				
Metropolitan Newtownabbey	4740	5509	2863	8372
North Down				
Bangor	4472	4899	840	5739
Holywood	411	472	0	472
Ards				
Ards			21	21
Total	51,828 (includes windfall)	52,586 (includes windfall)	10,738	63,324(including 178 windfall units)

8.0 PHASING

8.1 Following on from Stage 1 of the Public Inquiry it is considered phasing of the sites which meet the 'additional three year supply flexibility' and which currently have an acceptability index of 1 is not necessary. Any further land which may be brought forward to meet recommended higher levels of growth should be placed in a later phase.

9.0 CONCLUDING SUMMARY

9.1 By way of summary it is considered the amount and location of land to be brought forward in the adopted plan will take account of a number of factors including:

- The level of flexibility around the Adjusted HGI;
- The removal of sites zoned for housing in BMAP following the Public Inquiry process;
- The re zoning for housing of land which is currently zoned for an alternative use in BMAP following the Public Inquiry process;
- The inclusion of land for housing which is currently considered unsuitable for development following the Public Inquiry process;
- and
- The assessment by DRD of general conformity taking into account the level of over provision in relation to the Adjusted HGI.

SECTION 2

10.0 THE APPROACH TO THE DISTRIBUTION OF HOUSING GROWTH POTENTIAL IN THE METROPOLITAN RURAL AREA

10.1 As set out in the January 2007 paper the Department considers it appropriate to up-date the housing figures supplied in the Population and Housing Technical Supplement to take account of planning permissions granted since March 2003. Table 4 of the January 2007 paper is re-stated at Table 6 below which provides figures for the overall potential yield in the various settlements taking account of the 2006 Housing Land Availability Survey undertaken by the Department. Additional yield arising from development of sites outside of the urban footprints and not taken account of in BMAP is included in the updated figures.

10.2 As discussed at Stage 1 of the Public Inquiry it is not considered appropriate to carry out the following:

- A further urban capacity study;
- An adjustment of the minimum and maximum densities on zoned and designated sites in BMAP;
- A re-examination of all the remaining industrial land which is not the subject of objection with a view to re-zoning as housing;
- A further full housing needs assessment;
- A re-assessment of environmental designations;
- A further windfall assessment;
- A further Countryside Assessment; and
- A further allowance to the open countryside and allocation to small settlements

The Broad Evaluation Framework, allocation to settlements, strategic directions in the RDS and phasing are addressed later in this paper.

Table 6: Potential Housing Yield in the Metropolitan Rural Area

SETtlement	Potential yield in BMAp	2006 potential yield
Towns		
Ballyclare	2156	2269
Carryduff	1328	1443
Greenisland	915	969
Hillsborough	754	803
Moira	814	868
Whitehead	230	246
Villages		
Aghalee	100	125
Annahilt	92	105
Dromara	187	211
Drumbeg	76	85
Drumbo	6	8
Glenavy	354	492
Lower Ballinderry	129	176
Maghaberry	437	481
Milltown	155	163
Ravernet	5	33
Stoneyford	144	170
Upper Ballinderry	41	42
Ballyeaston	2	2
Ballynure	121	126
Ballyrobert	93	93
Cogry/kilbride	106	122
Doagh	312	360
Straid	87	88
Crawfordsburn	24	23
Groomsport	216	252
Helens Bay	54	82
Seahill	37	50
Moneyreagh	130	142
Small Settlements	507	620
Open Countryside	844	844
Windfall	190	8*
Total	10646	11501

*This is the residual uncommitted windfall total. Windfall development granted planning permission since March 2003 is included in figures in rows above

10.3 The Department considers that any additional yield arising from successful objections to BMAP within the proposed settlement development limits may be a factor to be taken into account in the determination of the amount of additional land to be brought forward to meet the Adjusted HGI. This would particularly be the case where the level of additional potential yield arising from this is considered to be significant.

10.4 The Concluding Summary (Section 16.0) of the January 2007 paper identified the following key strategic factors associated with the distribution of housing growth potential in the Metropolitan Rural Area:

- The identified potential housing yield in 2006 is virtually the same as the Adjusted HGI figure for the Metropolitan Rural Area.
- The need to balance this potential housing need equilibrium with the opportunity to better address other strategic housing growth related factors such as RDS directions and the need for flexibility around the HGIs.
- The sequential approach to distributing housing growth potential across the various sectors of the Metropolitan Rural Area.
- The establishment of criteria (factors) to allow a revised future housing growth assessment at both strategic and site specific levels.
- The complexity of the various factors that can determine the ultimate extent of new housing land potential in the various constituent parts of the Metropolitan Rural Area.

Following on from the discussion at Stage 1 of the Public Inquiry it is considered that the following factor is also of relevance:

- The Department considers it appropriate to allow for flexibility around the Adjusted HGI up to a level of approximately 13,800 to take account of the 'additional three year supply flexibility'.

10.5 The approach to the distribution of housing growth in the Metropolitan Rural Area builds on the January 2007 paper and is set out in this section as follows:

- Factors to be taken into consideration in the allocation of future housing growth potential.
- Revised allocation.
- Site specific factors to be taken into consideration in the location of future housing growth potential.
- Assessment of site specific objection sites
- Potential Yield
- Phasing.
- Concluding Summary.

11.0 FACTORS TO BE TAKEN INTO CONSIDERATION IN THE ALLOCATION OF FUTURE HOUSING GROWTH POTENTIAL.

11.1 The allocation process in BMAP for the Metropolitan Rural Area followed the sequential approach as set out in the RDS. It is considered the approach to identifying land to the distribution of housing growth potential to take account of the Adjusted HGI should follow the same sequence.

- 11.2 The RDS refers to maintaining a tension between the amount of housing within urban footprints and Greenfield sites and maximising the amount of housing within urban footprints. It is considered BMAP achieved an appropriate balance between urban capacity sites and Greenfield sites and that potential housing zoning within the urban footprints is maximised.
- 11.3 Consequently it is likely that any additional land for housing in response to the adjusted HGI will be located principally on Greenfield sites beyond the settlement development limits in BMAP.
- 11.4 It is considered the strategic distribution of housing growth potential should take account of a number of factors as set out below. The first two factors, RDS directions and the Broad Evaluation Framework were considered as part of the BMAP allocation process. The remaining factors are ones which were not fully taken into account in the BMAP process but which it is now considered are relevant to any resulting opportunity for increased housing growth.
1. **RDS directions.** The RDS refers to the significant planned expansion of seven small towns including Ballyclare, Carryduff and Moira which fall within the Metropolitan Rural Area. In particular the RDS indicates that with further growth Ballyclare will begin to take on the wider role of a main town. The RDS also makes reference to the consolidation of towns and villages and no large scale expansion of towns and villages in the BMA travel to work area. Overall it is considered that Ballyclare, Carryduff and Moira will be the main focus of additional growth.
 2. **Revised Broad Evaluation Framework.** It is considered appropriate to carry out a further broad evaluation framework to include the three small towns of Hillsborough, Moira and Whitehead together with the 23 villages to assist in any revised allocation of growth to these settlements. The RDS does not require a ranking

of the tests and accordingly equal weight is given to each. In evaluating each settlement against the individual tests a broad scoring system based on a high (H), medium (M), low (L) and zero (0) has been used. The final score reflects the totality of the individual scores. The higher the score the more suitable a settlement is considered to be for growth.

Where a settlement scores zero under the environmental capacity test it is considered there is no potential for further growth and therefore the overall score given to that settlement will be zero.

A revised Broad Evaluation Framework is contained in Table 7. This remains broadly similar to the one in the January 2007 paper with the exception of Drumbeg which is now given a zero growth rating due to its location in the Lagan Valley Regional Park. Table 7 indicates that Carryduff and Ballyclare score high, Moira and Hillsborough together with the villages of Doagh, Dromara and Glenavy score medium. The towns of Greenisland and Whitehead and the villages of Drumbeg and Helen's Bay score a zero against the environmental test and therefore are indicated as having no potential for growth. All other settlements score low.

Table 7. Revised Broad Evaluation Framework for the Metropolitan Rural Area

Settlement	Resource Test	Environmental Capacity Test	Transport Test	Economic Development Test	Urban & Rural Character Test	Community Services Test	Social Equity Test	Score
Towns								
Hillsborough	M	H	M	M	L	M	M	M
Moira	M	M	H	H	L	M	M	M
Greenisland	M	O	M	M	L	M	M	O
Whitehead	H	O	M	M	L	M	M	O
Ballyclare	H	H	M	H	M	H	H	H
Carryduff	H	H	M	H	H	H	H	H
Villages								
Aghalee	M	L	L	L	L	M	L	L
Annahilt	L	H	L	L	M	L	L	L
Dromara	M	M	L	M	M	M	L	M
Drumbeg	L	O	L	L	L	L	L	O
Drumbo	L	L	L	L	M	L	L	L
Glenavy	M	M	M	M	M	M	L	M
Lower Ballinderry	L	H	L	L	M	L	L	L
Magheraberry	L	M	L	L	H	L	L	L
Milltown	L	L	L	L	L	L	L	L
Ravernet	L	M	L	L	L	L	L	L
Stoneyford	L	L	L	L	L	L	L	L
Upper Ballinderry	L	M	L	L	L	L	L	L
Ballyeaston	L	L	L	L	L	L	L	L
Ballynure	L	M	L	L	L	L	L	L
Ballyrobert	L	H	L	L	L	L	L	L
Cogry/Kilbride	L	M	L	L	L	L	L	L
Doagh	M	H	L	L	M	M	L	M
Straid	L	L	L	L	M	L	L	L
Crawfordsburn	L	L	M	L	L	L	L	L
Groomsport	L	L	L	L	L	L	L	L
Helen's Bay	L	O	M	L	L	L	L	O
Seahill	L	M	M	L	L	L	L	L
Moneyreagh	L	H	L	L	M	L	L	L

3. **Age of Extant Plans** It is considered the time that has elapsed since the last review of a statutory plan is a factor to take into account in allocating any extra housing growth potential to settlements. Where it is some time since a plan was reviewed there may be reason to consider allocating additional housing growth to some of the settlements included in the area covered by such a

plan. Table 8 provides details of the last review of relevant extant plans.

Table 8. Review of Relevant Statutory Development Plans

District Council Area	Extant Plan	Time of Review
Belfast	Belfast Urban Area Plan (BUAP)	1990
Newtownabbey	Newtownabbey Area Plan (NAP)	1993 (Plan never adopted. Modifications were published but did not go to Public Inquiry.
Lisburn	Lisburn Area Plan	2001
Castlereagh	Carryduff Local Plan (no statutory plan for the District)	1988
Carrickfergus	Carrickfergus Area Plan	2000
North Down	North Down and Ards Area Plan	1984

The districts where it is considered the length of time since the last review is a factor are Belfast, Newtownabbey, North Down and Castlereagh.

4. **Land removed from the extant plans** Ballyclare is the only town in the Metropolitan Rural Area where a significant amount of zoned land was removed in BMAP to take account of the HGI in the RDS. It is considered this accounts for some 19.5 hectares which at an average density of 25 per hectare would yield approximately 500 dwellings. It is considered that additional housing growth should be allocated to Ballyclare to reflect this.
5. **Infrastructure.** It is considered that housing growth potential should be allocated to areas where additional growth will assist in the

provision of identified infrastructural requirements. BMAP contains a proposal for a non strategic road scheme in Ballyclare, Proposal BE 14 the Ballyclare Relief Road, which aims to provide traffic relief in Ballyclare town centre and facilitate housing development. The road is to be funded in the main by developer contributions. It is considered additional housing growth in Ballyclare will increase potential for delivery of the road and allow housing to take advantage of the road scheme.

6. Council Views. The Department considers the views of the Councils should be taken into account in allocating housing growth potential to settlements. The views of the various Councils from the consultation process associated with the publication of BMAP are given below.

- Carrickfergus Borough Council – Do not identify any strategic direction for further growth.
- Newtownabbey Borough Council – Identify Ballyclare and the villages as requiring further growth. However it is acknowledged that some villages may be more appropriate for further growth than others.
- North Down Borough Council – Do not identify any strategic direction for further growth.
- Castlereagh Borough Council – Identify Carryduff, Moneyreagh and Crossnacreevy as requiring further growth.
- Lisburn City Council – identify all villages as requiring further growth.
- Belfast City Council – Further to Stage 1 of the Public Inquiry the Council has identified urban footprints as the strategic direction for further growth.

7. Social housing. The Housing Needs Assessment produced by the Northern Ireland Housing Executive and published in Technical Supplement 1 identifies the level of social housing need in the Plan

Area. Table 9 sets out the identified need in the towns and villages against the BMAP allocation for social housing. The figures for social housing need have been updated to 2006 and the shortfall figures correspondingly changed from the figures in the January 2007 paper. It is considered the allocation of housing growth potential should take into account any shortfall in the provision of social housing.

11.5 With reference to matters raised at Stage 1 of the Public Inquiry the Department would comment as follows:

- The Department is unaware of any relevant direction or guidance on strategic urban design as referred to in paragraph 35 of Planning Policy Statement 12 – Housing in Settlements and has not therefore included this as a factor.
- Paragraph 35 of PPS12 refers to the unlocking of strategic development opportunities. It is considered this has been taken account of in the allocation process and it is therefore not necessary to include this as a separate factor.
- It is considered the emphasis on the sequential approach in order to achieve sustainable development together with the focus on urban capacity sites in BMAP has taken account of the need for efficiency in the use of land as referred to in paragraph 4 of Planning Policy Statement 1 – General Principles.
- It is considered that the relevant City/Borough/District Councils are representative of the community and there is no requirement to consult further with individual community groups regarding the distribution of housing growth potential.

Table 9: Social Housing in the Metropolitan Rural Area

Settlement	NIHE Housing Needs Assessment (HNA). Social Housing need within the Rural BMA.	Draft Plan allocation	Shortfall	HNA Sept 2006 (7 year projections)	Shortfall
Towns					
Ballyclare	10	-	10	64	64
Hillsborough/ Culcavey	32	9	23	67	56
Moira	17	-	17	30	30
Carryduff	47	15	32	25	10
Whitehead	5	-	5	7	7
Town Total	111	24	87	193	167
Villages					
Aghalee	2	-	2	0	
Annahilt	-	-	-	7	7
Dromara	4	-	4	0	0
Drumbo	4	-	4	0	0
Drumbeg/ Ballyskeagh/ Lambeg	98	-	98	90	90
Glenavy	19	-	19	0	0
Lower and Upper Ballinderry	2	-	2	17	17
Maghaberry	4	-	4	17	17
Ravernet (including Legacurry)	-	-	-	9	9
Stoneyford	5	-	5	5	5
Doagh	8	-	8	13	13
Ballynure	3	-	3	6	6
Groomsport	30	-	30	69	69
Crawfordsburn/ Helen's Bay	10	-	10	0	0
Moneyreagh	8	-	8	0	0
Seahill	-	4*	-	0	0
Village/ Total	197	4	197	241	241
TOTAL	308	28	284	434	408

*Note: Seahill was allocated 4 social houses which are not identified in the HNA.

11.6 Table 10 provides an evaluation of the towns and villages against each of the above seven factors which forms the basis of the allocation of housing growth potential to the settlements against the Adjusted HGI. In evaluating each factor a broad scoring system based on a high (H), medium (M), low (L) and zero (0) value has been used. The overall score in Column 8 of Table 10 reflects the totality of the individual scores. The overall score for some of the villages differs from those in the January 2007 paper as a result of changes to the figures for social housing. The overall score for each settlement needs to be set within the context of the relevant tier of that settlement. For example a high score for a town suggests the allocation of more housing growth potential than a high score for a village. Where a settlement has scored a zero against the broad evaluation framework then it is considered there is no potential for further expansion of the settlement development limit and the overall score for that settlement is therefore zero.

Table 10. Assessment of towns and villages against the seven factors

SEttlement	(1) RDS Direction	(2) Revised Broad Evaluation framework	(3) Age of the extant plans	(4) land removed from the extant plans	(5) Infra - structure	(6) Council views	(7) social housing	(8) overall Score
Towns								
Ballyclare	H	H	H	H	H	H	H	H
Carryduff	M	H	H	0	L	H	L	M
Greenisland	L	0	L	0	L	0	0	0
Hillsborough	L	M	L	0	L	0	H	L
Moira	M	M	L	0	L	0	H	L
Whitehead	L	0	L	0	L	0	L	0
Villages								
Aghalee	0	L	L	0	L	H	0	L
Annahilt	0	L	L	0	L	H	L	L
Dromara	0	M	L	0	L	H	0	L
Drumbeg	0	0	L	0	L	H	H	0
Drumbo	0	L	L	0	L	H	0	L
Glenavy	0	M	L	0	L	H	0	L
Lower Ballinderry	0	L	L	0	L	H	L	L
Maghaberry	0	L	L	0	L	H	M	L
Milltown	0	L	L	0	L	H	0	L
Ravernet	0	L	L	0	L	H	L	L
Stoneyford	0	L	L	0	L	H	L	L
Upper Ballinderry	0	L	L	0	L	H	L	L
Ballyeaston	0	L	H	0	L	H	0	L
Ballynure	0	L	H	0	L	H	L	L
Ballyrobert	0	L	H	0	L	H	0	L
Cogry/kilbride	0	L	H	0	L	H	0	L
Doagh	0	M	H	0	L	H	L	L
Straid	0	L	H	0	L	H	0	L
Crawfordsburn	0	L	H	0	L	0	0	L
Groomsport	0	L	H	0	L	0	H	L
Helens Bay	0	0	H	0	L	0	0	0
Seahill	0	L	H	0	L	0	0	L
Moneyreagh	0	L	H	0	L	H	0	L

12.0 REVISED ALLOCATION

12.1 The process of allocating housing growth potential in the Metropolitan Rural Area is as follows:

- Stage 1. An initial revised allocation based on the Adjusted HGI of 11,700.
- Stage 2. An adjustment to take account of factors not fully reflected in the initial allocation.
- Stage 3. A second adjustment to address any imbalance between the different tiers of settlement taking account of the 2006 yield.
- Stage 4. A third adjustment to take account of the 'additional three year supply flexibility'. This stage is additional to the

process as set out in the January 2007 paper and reflects the Department's approach presented at Stage 1 of the Public Inquiry.

Stage 1.

- 12.2 In light of directions in the RDS it is considered the proportion of growth to towns should be maintained at a level which is at least 60% of the overall allocation (the proportion in BMAP) and if possible increased. It is further considered that, in view of the identified infrastructural requirements and the age of the extant plan the relative proportion of housing growth to Ballyclare should increase. In view of environmental constraints it is considered that no additional housing growth should be allocated to Greenisland and Whitehead. Carryduff and Moira should at least maintain their respective proportions and the remaining town of Hillsborough should maintain its relative proportion of housing growth.
- 12.3 It is considered that in light of the directions in the RDS the proportion of growth to the village tier should not increase and should remain at about 27% of the overall allocation. In view of environmental constraints it is considered that no additional housing growth should be allocated to Drumbeg and Helens' Bay. Further to the January 2007 paper it is now considered that due to the similarity in scores for all villages in Table 10 it is considered they all should retain their proportion of the overall allocation.
- 12.4 The allocation to the small settlements in BMAP was based on housing potential from committed sites and sites suitable for housing. In view of the existing potential for development and the role and function of small settlements it is considered the allowance to this tier of settlement should reflect current commitments only.
- 12.5 The allowance to the open countryside in BMAP was mainly based on past trends. It is considered there is no requirement to re-assess this figure. It is also considered that as all open countryside in BMAP is

designated as Greenbelt it is not appropriate to make any adjustment to the allocation to settlements as a result of Draft Planning Policy Statement 14.

12.6 Columns 1 – 5 of Table 11 contain a revised allocation to settlements based on the above.

Stage 2.

12.7 It is considered the figures in Column 5 of Table 11 do not fully take into account the following;

- The amount of land removed from Ballyclare in BMAP
- The provision of the Ballyclare Relief Road.
- Growth to Carryduff in light of its score against the seven factors.

12.8 In view of the above an adjusted allocation has been made as shown in column 6 of Table 11. Ballyclare and Carryduff have been allocated further additional growth.

Stage 3.

12.9 Column 7 of Table 11 provides figures for the potential housing yield in settlements based on the 2006 Land Availability Monitor. The level of commitments in the village tier and the small settlements is above the allocated figure in Column 6. It is therefore considered appropriate to allocate further additional housing growth to the town tier in order to maintain the relative proportions between the town and village tiers. Column 8 of Table 11 contains a second adjusted allocation which increases the amount of housing growth potential in Carryduff and Ballyclare, the two towns with the highest scores. The second adjusted allocation is approximately 7% in total over the Adjusted HGI.

Stage 4.

12.10 Column 9 of Table 11 makes a third adjusted allocation to take account of the 'additional three year supply flexibility' around the Adjusted HGI. Additional growth is allocated to Ballyclare, Carryduff and Moira in light of their scores in Table 9. The allocation to Hillsborough is on a pro rata basis. The allocation to the villages is based on a pro rata uplift maintaining the overall proportion in this tier at 27% of the total allocation. The allowance to the small settlements and open countryside is not increased. It is considered the third adjusted allocation to the Belfast Metropolitan Rural Area meets the relevant directions in the RDS and takes account of other important considerations. The quantum of land to be brought forward in light of the Adjusted HGI and the 'additional three year supply flexibility' is that required to meet the total in Column 10 of Table 11 (the figures in Column 10 equates to the difference between Column 9 and Column 7)

Other Considerations.

12.11 It is considered any further allocation beyond the 'additional three year supply flexibility' in Column 9 of Table 11 should not be made solely on a pro rata basis but should take account of the factors in Table 10 with a particular focus on the town tier.

Table 11: Revised allocation to Settlements in the Metropolitan Rural Area

1. Settlement	2. BMAP Yield (inc. windfall*)	3. Percentage of allocation in BMAP	4. Score against the relevant factors	5. Revised allocation (uplift)	6. Adjusted allocation	7. Potential yield 2006	8. Second adjusted allocation	9. Third adjustment for '3 year flexibility'	10. Difference (Figures in brackets refer to windfall)
Towns									
Ballyclare	2206*(50)	21%	H	2676 (470)	2800	2269	2950	3400	1081 (50)
Carryduff	1398*(70)	13%	M	1521 (123)	1571	1443	1671	1941	428(70)
Greenisland	985*(70)	9%	0	985 (0)	985	969	969	969	0
Hillsborough	754	7%	L	819 (65)	819	803	819	902	99
Moirá	814	8%	L	936 (122)	936	868	936	1072	204
Whitehead	230	2%	0	230 (0)	230	246	246	246	0
Total	6387	60%		7167 (780)	7341	6598	7591	8530	1812
Villages									
Aghalee	100	0.90%	L	110 (10)	110	125	125	138	13
Annahilt	92	0.90%	L	101 (9)	101	105	105	116	11
Dromara	187	2%	L	206 (19)	206	211	211	232	21
Drumbeg	76	0.70%	0	76 (0)	76	85	85	85	0
Drumbo	6	0.10%	L	7 (1)	7	8	8	9	1
Glenavy	354	3.30%	L	389 (35)	389	492	492	542	50
Lower Ballinderry	129	1.20%	L	142 (13)	142	176	176	194	18
Maghaberry	437	4%	L	480 (43)	480	481	481	530	49
Milltown	155	1.50%	L	170(15)	170	163	170	187	24
Ravernet	5	0.05%	L	5 (0)	5	33	33	36	3
Stoneyford	144	1.40%	L	158 (14)	158	170	170	187	17
Upper Ballinderry	41	0.40%	L	45 (4)	45	42	45	50	8
Ballyeaston	2	0.02%	L	2 (0)	2	2	2	2	0
Ballynure	121	1.10%	L	133 (12)	133	126	133	147	21
Ballyrobert	93	0.90%	L	102 (9)	102	93	102	112	19
Cogry/kilbride	106	1%	L	116 (10)	116	122	122	134	12
Doagh	312	3%	L	343 (31)	343	360	360	397	37
Straid	87	0.80%	L	96 (9)	96	88	96	106	18
Crawfordsburn	24	0.20%	L	26 (2)	26	23	26	29	6
Groomsport	216	2%	L	237 (21)	237	252	252	278	26
Helens Bay	54	0.50%	0	54 (0)	54	82	82	82	0
Seahill	37	0.30%	L	41 (4)	41	50	50	55	5
MONEYREAGH	130	1.20%	L	143 (13)	143	142	143	158	16
Total	2908	27%		3182 (274)	3182	3431	3469	3806	375
Small Settlements	507	5%		507	507	620	620	620	-
Open Countryside	844	8%		844	844	844	844	844	-
Overall Total	10646	100%		11700 (1054)	11874	11493	12524	13800	2187

13.0 SITE SPECIFIC FACTORS TO BE TAKEN INTO CONSIDERATION IN THE LOCATION OF FUTURE HOUSING GROWTH POTENTIAL

13.1 The Department has identified a number of factors to be used to assess the suitability of individual sites for future housing growth above that which is already accommodated for in BMAP.

13.2 The first two factors are considered to be determining obstacles to housing development suitability. The last six factors are used to make judgements between those sites which are not excluded on the basis of the first two factors. At the strategic stage of The Public inquiry various levels of housing growth were discussed. In order to facilitate identification of the quantum of land to meet these various levels the assessment of sites against the last six factors includes a scoring system which allows judgements to be made between sites.

1. Environmental designations. Some land adjoining the settlement development limits in BMAP is the subject of proposed environmental designations which include

- Areas of High Scenic Value
- Sites of Local Nature Conservation Importance
- Local Landscape Policy Areas
- The Lagan Valley Regional Park
- The Coastal Area

The Department considers objection sites which are the subject of one or more of the above environmental designations are not suitable for future housing growth.

2. Constraints on development. The Department has consulted with statutory consultees regarding roads, water and sewerage and

drainage. Where the replies have indicated a constraint to development the site is considered to be not suitable for future housing growth.

- 3. Site Analysis.** This factor, which is further to the January 2007 paper and reflects discussion at Stage 1 of the Public Inquiry, relates to the characteristics of the site including topography and vegetation.
- 4. Northern Ireland Electricity Power Lines.** This factor is further to the January 2007 paper and reflects discussion at Stage 1 of the Public Inquiry. Whilst the presence of power lines is not considered to be a total constraint to development an assessment has been made of the impact such power lines have on individual sites
- 5. Compact Urban form.** Objection sites should result in a compact urban form and should not lead to an excessive amount of growth in any one direction. Sites which abut the settlement development limits in BMAP will be considered preferable to those which do not abut the limit.
- 6. Definition of Settlement Development Limits.** Where the settlement development limit in BMAP follows a well defined physical boundary including a major road, river or other physical feature then breach of that boundary to allow for growth will not be the preferred option if other sites that can more readily be absorbed into the urban form are available.
- 7. Social housing.** As the Department has been unable to distinguish between relevant objection sites against this factor all sites have been scored the same.

8. Other matters (comments). This includes matters not addressed in the above factors and will include planning history, existing built form and other matters which the Department considers material to the assessment of individual sites. Some other matters may come to light during Stage 2 of The Public Inquiry.

14.0 ASSESSMENT OF SITE SPECIFIC OBJECTIONS

14.1 In order to assist the Public Inquiry process regarding the distribution and quantum of land which is considered suitable for housing development across the Metropolitan Rural Area the Department has assessed all relevant objection sites against the above eight factors. A scoring system has been used against each factor as shown in Table 12.

Table 12 Scoring of Objection sites in the Metropolitan Rural Area

FACTOR		SCORE						Unacceptable
1	Environmental Designations							X
2	Constraints on Development							X
3	Site Analysis			0	-1	-2		X
4	NIE Power lines			0	-1			
5	Compact Urban Form		+1	0	-1			X
6	Definition of Settlement Development Limit		+1	0	-1			X
7	Social Housing		+1	0	-1			
8	Other matters	+2	+1	0			A	X

- 14.2 The scoring system is as set out in paragraph 6.2
- 14.3 Where an objection site is scored as unsuitable against any of the six factors against which an unsuitable score is possible, then generally the site overall is considered unsuitable for development. Exceptionally where 'other matters' are considered to be determining in favour of development then an objection site will be scored as 'A' against this factor and this will outweigh any other unsuitable scores for the site.
- 14.4 Objection sites which are not scored as unsuitable for development against any of the above factors have been placed in a category which reflects the overall score against the factors. The Department considers there are two main methods of placing sites into categories as follows:
1. Adding the individual scores against each factor and basing the categories on the final scores.
 2. Basing the categories on the number of positive and negative scores against the individual factors.

The Department is of the opinion that both methods are acceptable but that the second method is preferable as it is a more 'in the round' approach. Furthermore not all objection sites have been scored against all the factors. A site is only scored against 'other factors' where there is a relevant comment. Sites which do not abut the development limit are not scored against Factor 6.

- 14.5 Where an objection site is deemed unsuitable for development against any factor and where, following discussion at Stage 2 of the Public Inquiry the unsuitability is considered unjustifiable, then the site will be placed in the appropriate category depending on its scorings against the factors.

14.6 The categories are as follows:

- Category A. Sites which do not have any negative scores. Sites which have an 'A' score against other factors; this includes sites in small settlements.
- Category B. Sites which have one negative score.
- Category C. Sites which have two negative scores.
- Category D. Sites which have three negative scores.
- Category E. Sites which have four negative scores.
- Category F. Sites which have five negative scores.

14.7 In bringing forward sites it is considered Category A sites are preferable to Category B and so on down to Category F.

14.8 In respect of the village tier provided the overall proportion of growth does not exceed the 27% it is considered that where in a particular village objection sites are not sufficient to meet the allocation in Table 10 sites in other villages may be acceptable to make up the difference. This will not however be applicable at the town tier.

14.9 Objection sites which do not abut any settlement development limit in BMAP are not generally included in this assessment. Where however there are other objection sites which lie between the settlement development limit and the objection site then it may be included in this assessment.

- 14.10 In order to assist the Public Inquiry process in determining which categories should be brought forward for development each category is assigned an acceptability index. An index of 1 indicates those categories which it is considered need to be brought forward to meet the 'additional three year supply flexibility' as put forward by the Department. An index of 2 indicates those categories which it is considered need to be brought forward to meet higher growth figures. Should it be considered necessary individual categories can be further refined. Following Stage 2 of the Public Inquiry sites currently with an acceptability index of 1 may be moved down to acceptability index 2 as a result of other objections resulting in other housing potential being placed in higher categories.
- 14.11 For the purpose of identifying the amount and distribution of land to meet the Adjusted HGI each site has been assigned a yield based on an average density of 25 per hectare. The density figure for individual objection sites may however be refined by key site requirements to be discussed at Stage 2 of the Public Inquiry. In order to avoid double counting, where there are over-lapping sites, the potential yield on the smaller sites is placed in brackets in the Appendices and is not taken account of in the overall total.
- 14.12 Appendix 3 contains a summary of the scorings for all relevant objection sites. The final column gives the category and acceptability index. Appendix 4 provides more detail against each objection site. The site reference in the first column of the Appendices refers to the BMAP objection number. The order of the factors in the Appendices differs from that in Table 12.
- 14.13 The Department considers that in the Metropolitan Rural Area there are no alternative sites which are not the subject of objection which are more appropriate for housing.

15.0 POTENTIAL YIELD

- 15.1 Table 13 provides figures for the potential yield in the Metropolitan Rural Area. The figures in Column 5 take account of objection sites which the Department considers are suitable for meeting the Adjusted HGI against the Department's suggested 'additional three year supply flexibility' and which have an acceptability index of one.
- 15.2 Where the figures in Columns 4 and 5 of Table 13 are asterisked this indicates that the yield is significantly over that shown in Column 3. In the case of the villages this results from there being only one acceptable objection site in the settlement but which, due to its size, has a potential yield in excess of what is required to meet the allocation in Column 3. Exclusion of such sites would leave those villages without any sites which are considered suitable for development. In the case of Ballyclare the over provision results from the inclusion of a large site which if excluded would leave the town with a significant under provision against its allocation.
- 15.3 Whilst the total potential yield in Column 5 of Table 13 is above the 'additional three year supply flexibility' figure for the Metropolitan Rural Area in Table 1 it is not of a level which the Department considers is significant.
- 15.4 Additional yield may arise from the following:
- Windfall including higher densities being achieved
 - Successful objections within the settlement development limits regarding a change of zoning.
- 15.5 Furthermore potential yield to meet higher levels of housing growth potential than that proposed by the Department could also arise from

successful objections on sites currently considered to be unsuitable. This includes sites which are currently considered to be too large in terms of urban form but where a part only of the site may be determined as suitable.

TABLE 13: Potential Yield in the Metropolitan Rural Area

1 Settlement	2 BMAP yield (% of total yield)	3 Potential Yield in 2006	3 Allocation (Column 9 of Table 11)	4 Yield from Additional sites	5 Total Potential Yield
Towns					
Ballyclare	2206(21%)	2269	3400	1705*	3974* (28)
Carryduff	1398 (13%)	1443	1941	575	2018 (14%)
Greenisland	985 (9%)	969	969	0	969 (7%)
Hillsborough	754 (7%)	803	902	101	904 (6%)
Moirra	814 (8%)	868	1072	98	966 (7%)
Whitehead	230 (2%)	246	246	0	246 (2%)
Total	6387 (60%)	6598	8530	2479	9057 (63%)
Villages					
Aghalee	100	125	138	0	125
Annahilt	92	105	116	23	128
Dromara	187	211	232	23	234
Drumbeg	76	85	85	0	85
Drumbo	6	8	9	0	8
Glenavy	354	492	542	64	556
Lower Ballinderry	129	176	194	30	206
Maghaberry	437	481	530	60	541
Milltown	155	163	187	0	163
Ravernet	5	33	36	83*	116*
Stoneyford	144	170	187	0	170
Upper Ballinderry	41	42	50	0	42
Ballyeaston	2	2	2	0	2
Ballynure	121	126	147	15	141
Ballyrobert	93	93	112	1	94
Cogry/Kilbride	106	122	134	39	161
Doagh	312	360	397	123*	483*
Straid	87	88	106	0	88
Crawfordsburn	24	23	29	0	23
Groomsport	216	252	278	0	252
Helen's Bay	54	82	82	0	82
Seahill	37	50	55	0	50
Moneyreagh	130	142	158	0	142
Total	2908 (27%)	3431	3806	461	3892 (27%)
Small Settlements					
Small Settlements	507	620	620	-	620
Open Countryside					
Open Countryside	844	844	844	-	844
Overall Total	10646	11493	13800	2940	14,433

16.0 PHASING

16.1 Following on from Stage 1 of the Public Inquiry it is considered phasing of the sites to meet the 'additional three year supply flexibility' and which have an acceptability index of one is not necessary in any of the settlements. Any further land which may be brought forward to meet recommended higher levels of growth should be placed in a later phase.

17.0 CONCLUDING SUMMARY

17.1 By way of summary it is considered the amount and location of land to be brought forward in the adopted plan will take account of a number of factors including:

- The level of flexibility around the Adjusted HGI;
- The removal of sites zoned for housing in BMAP following the Public Inquiry process;
- The re zoning for housing of land which is currently zoned for an alternative use in BMAP following the Public Inquiry process;
- The inclusion of land for housing which is currently considered unsuitable for development following the Public Inquiry process;
- and
- The assessment by DRD of general conformity taking into account the level of over provision in relation to the Adjusted HGI.

