



REVIEW OF PLANNING APPLICATION

By Quarterlands Group

[LA05/2022/0033/F](#)

Objections to LA05/2022/0033/F housing development in Lagan Valley Regional Park—an AONB. We challenge policy discrepancies, environmental oversights, infrastructure gaps, and design clashes, advocating for a harmonious, sustainable future. Dive deeper at [quarterlands.com](#)."

We cannot negotiate with nature.
The Climate cannot compromise"

Danish Climate Minister Dan Jorgenson

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QUARTERLANDS GROUP INTRODUCTORY COMMENTS AND KEY POINTS ARISING FROM THE DEVELOPERS SUBMISSIONS

INTRODUCTION

Welcome to our comprehensive objection document, outlining our concerns regarding the proposed housing development (LA05/2022/0033/F) within the Lagan Valley Regional Park, an Area of Outstanding Natural Beauty. Our objections are rooted in the safeguarding of this cherished space, its infrastructure, and the well-being of its residents.

120 1. Planning Policy Objection:

The proposed development contradicts the newly adopted Local Development Plan 2032 (LDP 2032), which takes precedence over previous plans. The LDP 2032 emphasizes protecting open spaces, specifically highlighting the significance of the Lagan Valley Regional Park. Any deviation from this plan undermines the community's vision for a sustainable and green future.

2. Environmental Impact Objection:

130 Our objection revolves around the inadequate assessment of the site's ecological and landscape integrity and worth. The destruction of a 165-year-old hawthorn hedgerow, the removal of vital grasslands, and overall flawed ecology assessments pose severe threats to our biodiversity. The proposal ignores the importance of preserving habitats, in the light of increasingly well known facts about the importance of preserving and promoting all wildlife and wild spaces, wantonly impacting protected and priority protected species.

3. Infrastructure Objection:

Currently inadequate infrastructure, including sewerage and traffic management, pose serious concerns. The existing waste treatment facility's capacity issues, coupled with the narrow Quarterlands Road, raise alarms about potential flooding and pollution risks. Insufficient disability access planning and public transport options further compound the infrastructure inadequacies.

4. Design, Siting, and Layout Objection:

140 The proposed development's architectural style and layout clash with the local area's character. The lack of regard to new environmentally aware building practices. The discrepancy in building heights, serious safety concerns related to shared surfaces, and the impact on residents' amenities violate the essence of a harmonious and safe living environment. Our objections are rooted in the right to enjoy our properties and the protection of our surroundings and the future of the area under various legal frameworks.

This summary provides a brief overview of our objections.

We invite stakeholders, residents, and decision-makers to carefully consider the implications of this development on the Lagan Valley Regional Park both now and in the future, we have seen the plans for the future and wish to retain green space integrity and quality of life for its inhabitants.

PLEASE NOTE

150 We do understand that only the LDP 2032 and SPPS are relevant, and there is no interim arrangement. We wish to make it clear at the very beginning that we have asked for similar action in respect of the Rebuttal from the Planners as advice repeatedly provided to us in terms of being told by Planners that they would redact or return comments made by us not in keeping with the LDP

Every Neighbour Notification letter has stated

160 *'Please note we can only take into account issues which are relevant to planning and can only refuse applications where there are sound and clear-cut planning reasons to do so. Where we consider the nature of comments made or information provided in a representation is such that it largely detracts from the relevant planning matters, we will either redact the relevant information or alternatively the representation may be returned to the sender with a covering letter advising that the representation should be reconsidered and reworded before being resubmitted.'*

27 emails and countless posted letters saying the same thing received to one address contact@quarterlands.com the latest being on 7/12/23 as well as this having been made clear throughout in person and in calls.

Therefore, comments we are making in respect of the Rebuttal's use of previous plans and policies is because of lack of response from Planners to our repeated enquiry re LDP being the sole extant document with SPPS and a repeated lack of information from them as to what their guidelines are on which planning applications are decided.

170 In the absence of a useful response and guidance we have therefore felt forced to respond to the developers documents published on the portal Nov, Dec 2023 on the **LAP2001**, **dBMAP**, unlawful **BMAP** etc. as well as the **irrelevant previous planning application** for the site. However we have **highlighted** them throughout to emphasise their irrelevance in terms of the extant legislation.

KEY POINTS

The Policy Considerations set out in Section 2 of the Rebuttal are the: **LAP 2001**; the **Draft BMAP** and the **unlawfully Adopted BMAP**. We have highlighted these throughout to indicate where the developers point should be ignored by the planners as they are using the wrong legislation.

180 On the 28 June 2023 the Department for Infrastructure directed that each Council adopt its Local Development Plan (LDP 2032) as soon as practicable, and that the direction took immediate effect from the 28 June 2023.

LCCC adopted its LDP 2032 on 26 September 2023 to comply with the DfI's directive.

This means that:

- all previous plans and policies, such as those referred to in Section 2 of the Rebuttal Report ceased to be extant. They have no further relevance save for the Strategic Planning Policy Statement for Northern Ireland 2015 (SPPS) which continues to have material weight;
- reference to a transitional period, referred to in the Rebuttal is inaccurate. The claim ignores the fact that while SPPS does refer to a transitional period the DfI's Directive of June 2023 does not establish transitional arrangements. In practice, therefore, there is no transitional period. We understand that LCCC has received legal advice to this effect prior to the adoption of its new area plan and policies. The DfI we understand has stated that transitional periods were and will not be put in place;
- the wider discussion in the Policy Consideration Section of the Rebuttal have no weight given their reliance on non-extant policies and plans and the reliance on transitional provisions.

190

REBUTTAL - POLICY CONSIDERATION

DIFFERENT PLANS FOR DIFFERENT PARTS OF THE COUNCIL AREA?

REBUTTAL STATEMENT PAGE: 2

*Quote from the Rebuttal Document - 2.3 Under the transitional arrangements set out in the Plan Strategy, the **existing Development Plans remain in effect for different parts of the Council area**. When considering land use zonings, designations, key design considerations, and proposals maps, for this application, the Lisburn Area Plan 2001 (LAP) remains the extant Local Development Plan.*

200

*2.4 Given the advanced stage reached in the process of adopting the Belfast Metropolitan Area Plan (BMAP), both it and the draft version (dBMAP) remain material considerations in conjunction with the recommendations of the Planning Appeals Commission Public Local Inquiry Report and DoE Adoption Statement until such time as the Council's new Local Policies Plan (LPP) is adopted. In the context of this proposal, substantial weight should be afforded to the provisions of the **unlawfully adopted version of BMAP**. Our rationale for this approach is set out below.*

210

While the Developer says in section 2.3 that the **2001 (LAP)** is the extant Local Development Plan. They then contradict themselves in the next section by saying that the context of this proposal should be measured against the **unadopted dBMAP** and the unlawful BMAP.

The Rebuttal's claim at paragraph 2.3 that the **2001 (LAP)** is the extant Local Development Plan is incorrect. It is then contradicted in the paragraph 2.4 which states that the context of this proposal should be measured against the **BMAP**, the **unadopted dBMAP** and the **unlawful BMAP** until such time as the Council's new Local Policies Plan (LPP) is adopted.

220 *Quote - 2.5 The LAP 2001, Plan Strategy1 acknowledges that the settlement limit within several villages, including Drumbeg has been formulated based on facilitating limited growth. Policy H12 continues this theme by noting that sites suitable for residential development are located within certain villages.*

The LAP 2001 Plan Strategy was based on the premise that growth should be limited for the good of the community. It should be noted that growth has already happened on non-designated lands in the area. Continuing growth in the area is at odds with the LAP 2001

It also clearly identifies DRUMBEG AS A VILLAGE NOT an Urban development

DRUMBEG IS IN THE LAGAN VALLEY REGIONAL PARK

230 *Quote - 2.6 The planning application site is whiteland within the settlement limit of Drumbeg and is not located within the Lagan Valley Regional Park (LVRP). The Plan notes that whiteland is neither zoned nor indicated as suitable for development as there may be physical, environmental, or other constraints to development. The Plan goes on to confirm that development will be permitted on such land, if the constraints can be overcome, and the development is otherwise acceptable in the context of planning principles, policy and practice. The LAP, whilst not formally designating the planning application site for residential development identifies it and two other sites for future development, the inference being that the lands are suitable for residential use. The Plan directs that future development proposals in Villages will be considered in the context of all prevailing regional policy and relevant policies in the Plan.*

240 **The Response from the Lagan Valley Regional Park dated 30 March 2022 states that the proposed development site is within the LVRP. Claims in the rebuttal to the contrary are inaccurate.**

The site is in Drumbeg which is in the Lagan Valley Regional Park however often the developer says it is not.

House number 66 Quarterlands Road which was built with planning permission but initially did not have ownership and an access road were built on whiteland. As noted in paragraph 2.6 development on whiteland can be permitted 'if the constraints can be overcome, and the development is otherwise acceptable in the context of planning principles, policy and practice'. With the adoption of the LDP 2032 we do not accept that the proposed development is in keeping with planning principles, policy and practice.

250 **THE APPLICATION SITE LAND WAS NOT ZONED FOR HOUSING, AND PART OF THE SITE IS WHITELAND ("THE LANDS DO NOT HAVE A SPECIFIC LAND USE ZONING ALLOCATED" "THE LAND IS NOT ZONED IN THE EXISTANT AREA PLAN"(ALISTAIR BEGGS CHIEF PLANNER AND DIRECTOR REGIONAL PLANNING POLICY & CASEWORK JULY & OCTOBER 2023)**

KEY DESIGN CONSIDERATIONS

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2.7 There are 2 Key Design Considerations (KDC) relevant to the planning application site (lands to the rear of Zenda Park): The retention and enhancement of boundary planting, and Development to be single storey, with a floor level no greater than 0.25 metres above ground level and a ridge height no greater than 6 metres above floor level, to avoid the visual intrusion into the undeveloped gap between the eastern and western portions of Drumbeg.

2.8 Policy H1 directs that KDC specific to each site are listed to guide developers⁴. The policy does not seek compliance with the KDC, rather that they are considered as part of the exercise of planning judgement.

The **LAP 2001** has a very precise Key Design Consideration that development should be no higher than 6.25m above ground level to avoid visual intrusion. The Planners established this figure as a guideline to allow scope for Planning judgement. It is not a mandatory requirement.

270

Planning judgement was exercised at Sandyhill where the ground to ridge height is ~ 6.8m above ground level, and at Quarterlands Lane where the ground to ridge height is ~ 7.5m. In the case of Quarterlands Lane the height is mitigated as the site ground level was lowered by 1.5m giving an equivalent skyline ridge height of 6m.

Number 66 Quarterlands Road has a ridge height of 7.2m and is on the high side of the road, which make it look imposingly out of character. It appears to be right on the limit of the maximum height for the area, if not already over. Given that the tallest houses in the development will be 1.5m higher than No.66 and some will be almost 2m higher on the site, even the currently imposing No.66 will be dwarfed by neighbouring houses 50% higher than it. HOU 4

This is exactly the sort of visual intrusion that the lawful extant Plan tried to guard against. HOU4

280

KEY SITE REQUIREMENTS

*2.9 Within **dBMAP** the planning application site was identified to be zoned for housing (DG 03/01) with several Key Site Requirements (KSR) attached to the designation.*

The unadopted **dBMAP** retained the whiteland of the **LAP 2001** Plan as did the **unlawful BMAP**. There is no mention of this in the Key site requirements, so where does the assumption come from that the 6.25m height restriction no longer applies? The application site land is not zoned for Housing (see above)

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- The development must be designed, landscaped, and implemented to accommodate the overhead power lines and adheres to standard safety clearances.

The overhead power lines consist of those between pylons running north-south and lower ones running east-west. The latter ones are directly above site 1 on the proposed site development plan and possibly house 6 or 7. The Key Site requirement of the **unadopted dBMAP** required that a wayleave for cables relating to these pylons. The Rebuttal provides no information regarding this matter.

REBUTTAL STATEMENT PAGE: 3-4

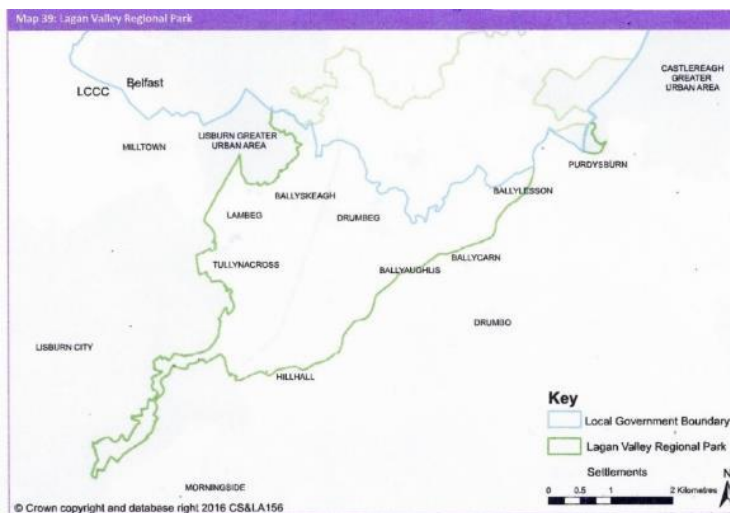
300

2.10 Notably, no KSR were proposed with respect to the finished ground level or height of the buildings. This change in direction from the position outlined in the **LAP 2001**, particularly the removal of the reference to single storey development, and the inclusion emphasises that the site had capacity to absorb taller buildings, providing that they responded to their surrounding context and environs. This approach resonates with the general thrust of planning policy towards compact urban form, and the promotion of more sustainable communities. Critically, **dBMAP** both identified the site to be zoned for housing and extended the LVRP boundary to include the subject site and the balance of Drumbeg Village, the firm intention plainly being that residential development was considered in principle to be consistent with inclusion within the LVRP designation.

310

Having said (incorrectly) in point 2.6 that the whiteland was NOT in the LVRP the Developer then contradicts in 2.10 by saying “consistent with inclusion within the LVRP.” Does the Developer know where the LVRP actually is? .

We are not urban form. Drumbeg is rural and a village .

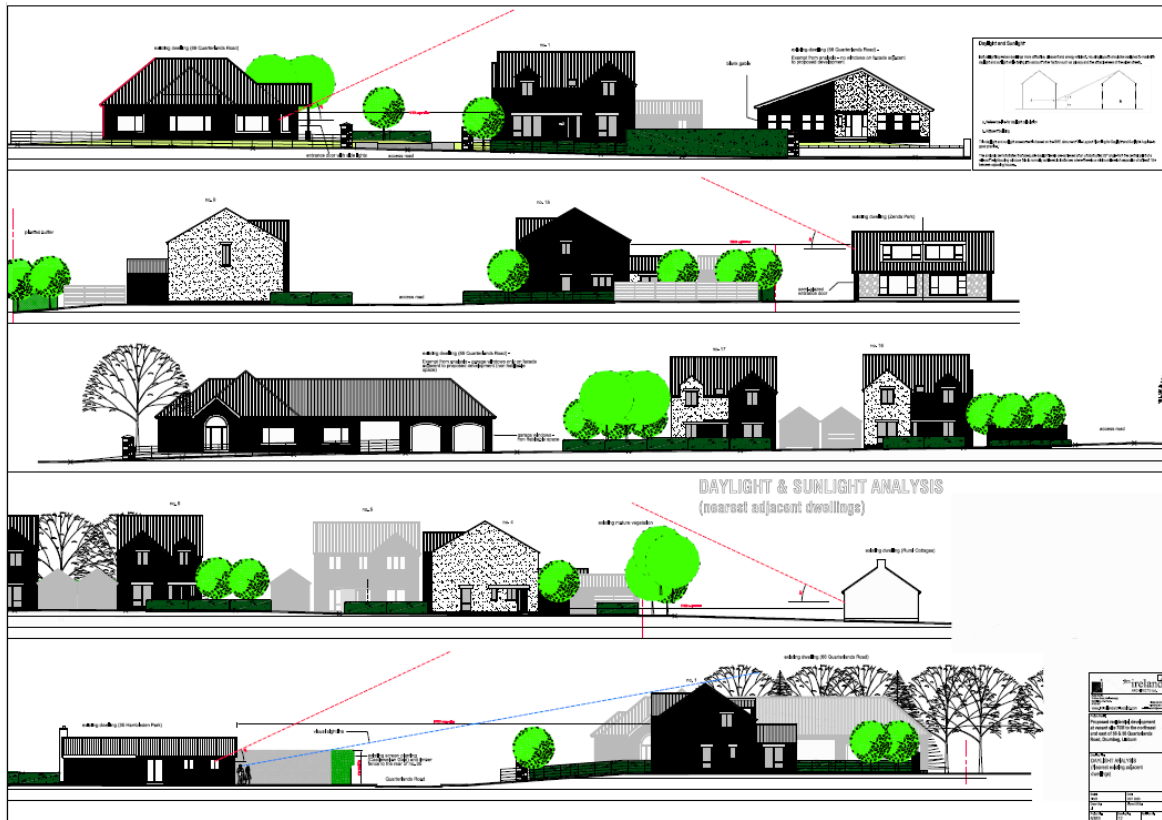


The developments at Sandyhill and Quarterlands Lane which do not adjoin this site, are two storey their skyline ridge heights and design are close to the **LAP 2001** guideline. This confirms that there is no change in direction towards taller buildings but rather the desire to maintain an empathy with the surrounding housing context and environs.

That large three storey equivalent height, four and five bedroom houses, are described as “compact urban form”, is of concern as such structures are more commonly associated with multi-storey apartments blocks. HOU 4 **We are rural not urban.**

The Developer provided clear height comparisons in Appendix 3 the Daylight Analysis Plan. Using these data we can state that the proposed new development is much taller than the surrounding buildings. In the case of Rural Cottages and Hambleton Park, the new ridge heights are double those existing ridge heights

See Appendic 3 Daylight Analysis document below.



CLEARLY VISUALLY INTRUSIVE

The balance of Drumbeg village has been totally skewed to building houses and not supplying village amenities by developers and planners. Drumbeg was included in the LVRP when it was designated. Local farmers were compensated to keep the land for agricultural usage only and the land was designated Green Belt. This has been supported by Dr. Andy Bridge, Manager of the LVRP who recognises the importance of river corridors and open foraging land for wildlife and the extensive carbon sink provided by the Hedgerows and scrubland. This resource also provides for the inhabitants of both Lisburn and Belfast and visitors and tourists in the area.

340

2.11 Whilst part of the land proposed to be used to facilitate access to the site and Unit 1 does not lie within housing designation DG 03/01 in dBMAP, it is whiteland and as such is not designated for any particular use but is available in principle for development. The proposal to develop this land for an access to serve the proposed development and a single dwelling is therefore entirely compliant with the prevailing local policy context.

Planners who producing the unadopted dBMAP, did not designate the whiteland for housing. In doing so they must have concluded that 'in principle' that it should NOT be developed for housing. This conclusion takes account of the fact that a decision was taken by these Planners to designate DG 03/01 for housing, which is site immediately beside the proposed development site.

The non-designation of the whiteland shows that the policy context has already been judged, therefore, building the access road and Unit 1 on it is not compliant with the local policy context.

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2.12 In the unlawfully adopted version of BMAP the land is designated as a committed housing site (designation DG03/02) to reflect the grant of planning permission for residential development (S/2006/0690/F), the fact of which is a material planning consideration deserving of substantial weight, given that the then planning authority evidently considered that the residential development of the site within the overall context of the LVRP was acceptable. In view of the committed development, the Department of Environment (DoE) did not consider it necessary to attach any KSR to the housing zoning.

360

The claims in the above paragraph are inaccurate In the unlawful BMAP the land designated as housing zone DG03/02 does not include the whiteland beside it and has a different access point.

Neither did the residential development (S/2006/0690/F) have a building on the whiteland proposed for unit 1 as proposed in the current proposal.

A house was built some years ago with planning permission but initially did not have ownership of the land on which it was built. This exception should not carry substantial weight in respect of this proposed development as it has a different site footprint and totally different housing stock.

IRRELEVANT PREVIOUS APPLICATION

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2.13 S/2006/0690/F was approved in April 2008 for 15 large dwellings and postdates the publication of dBMAP. There was no requirement within the LAP 2001 for the proposal to comply with the KDC; rather the Plan references that considerations were to guide developers. The proposal was compliant with the KSR of dBMAP, save for the first requirement as the proposal had a gross density of 13.6 dwellings per hectare compared to a minimum gross of 20 dwellings per hectare.

2.13 S/2006/0690/F was approved in April 2008 for 15 large dwellings and postdates the publication of dBMAP. There was no requirement within the LAP 2001 for the proposal to comply with the KDC; rather the Plan references that considerations were to guide developers. The proposal was compliant with the KSR of dBMAP, save for the first requirement as the proposal had a gross density of 13.6 dwellings per hectare compared to a minimum gross of 20 dwellings per hectare.

380 The Rebuttal refers to a previous planning application for the site made in 2006 (S/2006/0690/F) which was approved in 2008. The approval was not enacted within 5 years. While it is historical information in respect of the site it has no relevance. The Rebuttal makes claims in respect of application S/2006/0690/F which are factually inaccurate and addresses further issues relating to the proposed development. The following issues are pertinent to consideration of planning application LA05/2022/0033/F:

The Rebuttal Report claims that the approval granted for S/2006/0690/F was for '15 large dwellings' (Para 2.13 and associated footnote 6). The approval was, however, actually for 12 semi-detached houses, 8 of which were two storey houses and 4 chalet type, and 3 detached two storey houses. To describe the past approval being for 'large dwellings' STRETCHES THE FACTS to fit the developer's intent rather than dealing with the facts in an open and transparent manner;

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The Rebuttal claims that the evidential context presented demonstrates that the site is a quasi-housing zone. In doing so it seeks to associate the proposed development with the 2008 approval. In terms of scale this is not the case. The type of houses envisaged, the absence of a transport infrastructure to reduce dependence on cars, the failure to protect and enhance historic and Natural Environment are just a selection of areas from the policy objectives set out in LDP 2032 which will not be achieved by this proposed development;

Discussion in the Rebuttal of comparisons between the proposed 17 houses and the now defunct S/2006/0690/F relies on the previous policy and planning context which are defunct from 26 September 2023. They, therefore, lack merit;

400 The LDP 2032 seeks 'to maintain a sense of place and to integrate new developments in a way that does not detract from the character and integrity of the settlement' (Page 56). Page 59 of the LDP 2032 also notes that 'there appears to be a healthy supply of housing across the Council's area'. Housing types recommended and the demand generally for the LCCC are 1 and 2 bed. The Council further recommends that 'future development is proposed to be a mix of housing and employment use'. The Council also refers to all families living in affordable housing. The Rebuttal fails to address the current plans and objectives of the Council in these regards or how this development would advance their attainment;

it has been established above that the Key Design considerations are there as guidelines, not requirements. Any KDCs ignored in 2008 were undoubtedly against the spirit of the LAP 2001 Plan Strategy.

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The Rebuttal does not clarify how this proposal would be compliant with the unadopted dBMAP when it did not comply with a Key Site Requirement of that Plan.

REBUTTAL STATEMENT PAGE: 5

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2.15 Section 6(4) of the Planning Act (Northern Ireland) 2011 states that in making any determination under the Act, regard is to be had to the Local Development Plan (LDP), the determination must be made in accordance with the Plan unless material considerations indicate otherwise.

No reference is available in the Rebuttal to the LDP 2032 and factors within which would be material considerations in respect of the proposed housing development. As already noted above in comments on paragraph 2.13 there are key issues in the LDP 2032 with which the proposed development does not comply.

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2.16 The evidential context presented demonstrates that the site is a quasi-housing zoning. Whilst not formally zoned within the LAP 2001, the Plan recognises the site has having the potential to contribute to future housing needs in the village. This is supported by the Plan explicitly referencing the planning application site and attaching KDC to guide future development and two other development areas (both of which have been developed) in the context of new residential development.

NB. NOT FORMALLY ZONED = NOT ZONED

The new LDP 2032 emphasises LCCC's plan to protect and enhance the LVRP and its surrounding area. The Rebuttal does not acknowledge this key aim of the LDP 2032.

As has been already addressed the lands do not have a specific land use zoning allocated (A. Beggs 2023)

440

It is also worth noting that House 66 (on the low part of the site) has a finished ridge height of 7.2m which looks incongruous with surrounding properties. Comments in relation to paragraph 2.8 above already address ridge height within the proposed development and surrounding areas. HOU 4i

DRUMBEG IS RURAL.

HOU1 Applies "On land zoned for residential housing." The land was NOT zoned for housing.

HOU1 "Centrally located housing is environmentally sustainable, utilises existing infrastructure and encourages walking, cycling, and use of public transport contributing to active travel."

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Drumbeg lacks sustainable public transport, sustainable infrastructure, and walking and cycling is unsafe on the Quarterlands Road, Ballyskeagh Road and Hillhall road due to heavy traffic and narrow roads. Furthermore it is not safe on the site carriageway for pedestrians and cyclists because of planned shared surface arrangement.

Therefore, the criteria for HOU 1 is NOT met in this application.

2.20 The site is located within the settlement limit of Drumbeg Village and is not identified for any specific use in the LAP;

The Rebuttal's statement confirms that **THE SITE IS NOT IDENTIFIED FOR HOUSING**. Supported by Alistair Beggs (July, October 2023)

460

NOTE: The rebuttal does not cover HOU 2 Protection of Land Zoned for Housing

- a) This is only for land zoned and not identified as Key Site Requirements(KSR)
- b) That the proposal meets a demonstratable community need. There is no community waiting list for Drumbeg

This application does not meet either of these criteria in HOU 2

REBUTTAL STATEMENT PAGE: 6

470

2.22 Policy HOU 3 states that planning permission will be granted for new residential development where it will create a quality and sustainable residential environment which respects the existing site context and characteristics, and it is expected to conform to the following criteria.

(a) the development respects the surrounding context, by creating or enhancing a local identity and distinctiveness that reinforces a sense of place, and is appropriate to the character and topography of the site in terms of layout, scale, proportions, massing and appearance of buildings, structures and landscaped and hard surfaced areas

480

2.23 The development has been designed to respond to the existing character of the area in terms of the configuration and form of the homes, while providing for the needs of modern families and making efficient use of the available land.

Whether the development “respects the surrounding context” is a subjective view. Current members of the existing community do not think the development respects the surrounding context as the scale of the houses will tower over the surrounding community and are inappropriate to the character and topography of the site. In the immediate vicinity of the site 34/40 85% of the houses are 1 or 1.5 storeys in height.

The houses adjoining the site are 100% 1 or 1.5 stories tall.

490

2.24 The site is not in a prominent position in the village, rather forms an infill site surrounded, and enclosed by existing dwellings on three sides. The fourth side being the eastern boundary that adjoins open countryside. Particular attention has therefore been paid to ensuring this boundary vegetation is retained and enhanced in a manner that will create a more defined and robust boundary to this side of the village.

The site is currently not prominent. The proposed development would make it the most prominent position in Drumbeg West. The incongruous nature of the new development will skew the boundary skyline with heights 5m above neighbouring skylines. It is not an infill development (see below).

NB. INFILL DEVELOPMENT

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Refers to building within unused and underutilized lands within existing development patterns, typically but not exclusively in urban areas. Infill development is critical to accommodating growth and redesigning our cities to be environmentally and socially sustainable. Its objective is to reduce sprawl and committed to promoting compact development. It is often referred to as development within a small gap within an otherwise built-up street frontage.

The site applied for by the Developer off Quarterlands Road has Zenda Park to North west. West is a mixture of a Hedge and the backs of 5 homes and Rural Cottages lie to the South. The North and East of the site is open abutting against Agricultural Land. This planned development is NOT in a gap within an otherwise built-up street frontage.

There are 6 Principles for Infill Development:

510

- Reduce Greenhouse Gas Emissions and improve regional air quality.
- Reduce conversion of agricultural land, sensitive habitat and open space for new development.
- Reduce costs to build and maintain expensive infrastructure
- Facilitate healthy and environmentally friendly active transportation
- Reduce Storm Water run-off resulting in flooding and pollution of waterways

· Bring vibrancy, community and Social Connection to neighbourhoods.

None of these 6 Principles Operate for this Development. Therefore, this is not an infill development

520 *2.25 The pattern of development in the existing residential enclaves of the village is predominantly characterised by short cul-de-sac streets which slow down traffic and make walking around the settlement easy, while the front gardens look generally open and welcoming to passers-by, which is likely to establish a sense of community and attachment to place.*

The large detached houses built at Quarterlands Lane in 2008/09 has not resulted in those residents feeling a sense of community or attachment to the area. Instead they live detached lives from the established local community. It is likely that a new development of 17 large houses, 15 of which will be detached and having a ridge height equivalent to 3 storeys will result in another 'detached' community which would add little to the Village.

530 **Hambleton Park in curtilage road width is 6m and each of the 2 footpaths measure 2m giving a total area of 10m. The equivalent in the proposed Development is 6m as there are no footways and a shared surface arrangement for pedestrians, cyclists, disabled motorised users along with all forms of motorised transport with parked vehicles in 14 on-street parking areas. These 2 areas are not comparable cul de sacs.**

HOU3 States Context and Characteristics of new Residential Development.

An overall design concept, in accordance with Policy HOU6 must be submitted for all residential proposals and must demonstrate that a proposal draws upon the positive aspects of, and respects the local character, appearance and environmental quality of the surrounding area. Proposals for residential development will be expected to conform to all the following criteria:

540 a) the development respects the surrounding context, by creating or enhancing a local identity and distinctiveness that reinforces a sense of place, and is appropriate to the character and topography of the site in terms of layout, scale, proportions, massing and appearance of buildings, structures and landscaped and hard surfaced areas.

The development does not respect the existing settlements in any way.

The road structure within the proposed development and the additional traffic it will bring to the area are likely to create increased traffic issues for the community. The 69 potential car parking spaces on site will make a significant contribution when fully used to not only Green House gases, air pollution, noise and associated traffic chaos particularly at peak times of the day. In addition the shared surface arrangement will lead to accidents as discussed in [Q Appendix 1](#).

550 The idea of passers-by viewing the open gardens on the site has no basis in reality and is estate agent speak.

2.26 The proposed development continues this approach to street layout with a short entry street providing access to all the new houses and providing a context within which residents can meet each other casually. The new proposal follows this pattern of local development character very closely and it would be expected that the new residents would naturally also support and contribute to Drumbeg's sense of place, identity, character, and well-being.

560 These statements lack practical insights into fostering a sustainable community. Building a thriving community requires investments in essential components such as time, communal spaces, educational institutions, childcare facilities, local businesses, and recreational areas. Establishing genuine connections goes beyond lip service to a "sense of place."

HOU 4 e,g,h,i are not met in this statement by the developer.

The proposed new development will bring increased traffic along the Quarterlands Road with traffic congestion increased at the following exit points: from the site onto the Quarterlands Road; on to the Ballyskeagh Road; and on to the Hillhall Road. All roads which already are too narrow for 2 saloon cars to pass each other, are insufficient to cope with existing traffic, especially when there are traffic problems on the M1, the Hillhall or Ballyskeagh Roads, when the Quarterlands Road is used as a 'rat run'.

570

2.27 The existing houses fronting Quarterlands Road (east side only) are a mix of house types – single storey bungalows, 1.5 storey new and altered houses, along with new and older 2 storey houses. The one house on the development site which will face the street will sit across the entrance lane to a recent and very large purpose-built 1.5 storey house (No. 66 Quarterlands Road), as well as next door to a wide-fronted single storey house with a high ridge (58 Quarterlands Road).

Unit one is almost 1.5m higher ridge than No.66, which in turn is ~1.5m higher than its neighbour No.68. Unit 1 is over 1.5m higher than No.58, which in turn is 1.5 m higher than its neighbour No.56. The point being made is that both the existing houses mentioned above are very large compared to the rest of the houses in the neighbourhood, and yet Unit 1 is considerably larger than both of them. (See also comments at Para 2.8 on ridge height). HOU 4 i

580



LA05/2022/0033/F
Proposed development showing the relative heights of surrounding buildings.

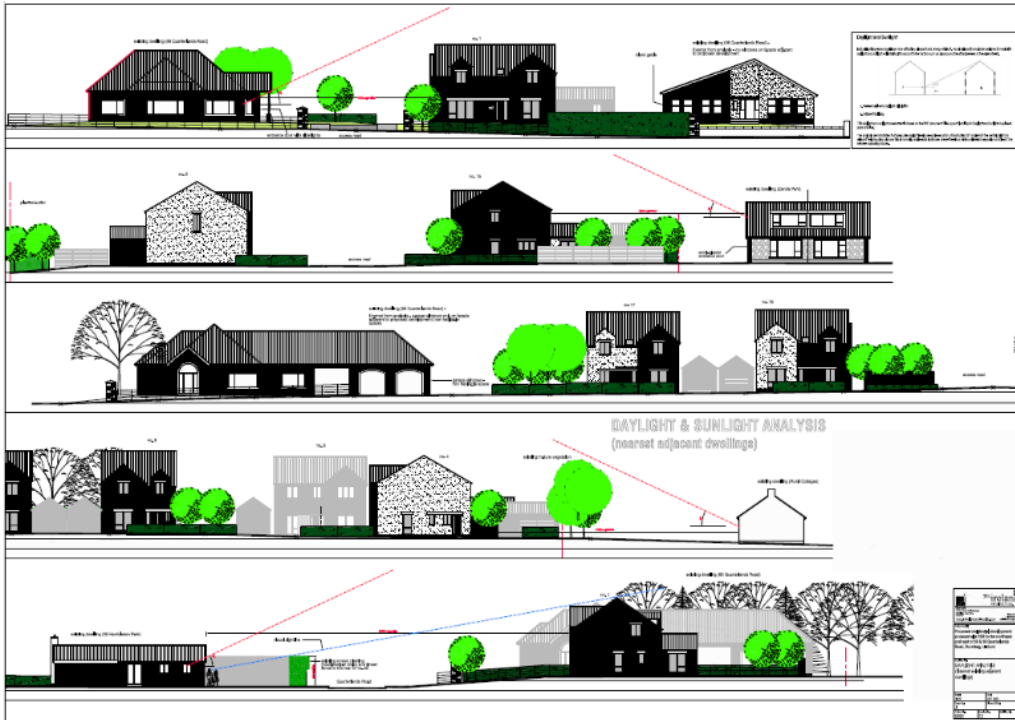
- Key:
- 19 - Single Storey homes
 - 15 - 1.5 Storey homes
 - 5 - 2 Storey
 - 17 - Proposed 2.5 Storey
 - 1 - Existing 2.5 Storey

Please also note that the land slopes upwards from here, by about two metres across the site, not downwards.

Perspective 10 shows Ridge Heights obscured by mythical trees from the developer



Light analysis with comparison of 35 Hambleton and particularly Rural Cottages the final panel below against 1 of the proposed houses.



REBUTTAL STATEMENT PAGE: 7

2.28 This new dwelling (Plot 1) will add comfortably to the local mix in this street and clearly identify the entry point to the new development. Quarterlands Road includes examples of all types of Drumbeg houses, and the new development will contribute to the current variety, while also bringing a more consistent street edge, consistent use of materials and new high-quality building to this 40-metre gap in the street continuity. Most of the new housing will sit behind existing housing and will only be able to be seen clearly on entering the site.

600 Plot 1 in many neighbours' eyes will be an uncomfortable visual intrusion and clash with the local mix. In the proposal (S/2006/0690/F), the Rebuttal attributes significant weight to that application, which carries no material weight since 2015. In that defunct application there was no house proposed to be built on the whiteland, which was never zoned for housing and is under overhead power lines.

It is the size (5 beds) with the 1 Storey return now a reality and fixed to the main house giving each house except the Social Housing an extended footprint with the highest Ground to Ridge recorded in an area where 85% are 1 and 1.5 storey's along with a rising ground level from West to East of 2M renders these houses dominant in the landscape and all will be easily seen from Quarterlands Road.

610 The idea of using a single house in the 40 metre gap to bring the desired consistent street edge and continuity when height and size of this development will not be consistent with the other houses in the rural landscape of the Hamlet/village of Drumbeg in the LVRP. This causes concern about when the 400m gap between Drumbeg East and West will be the next space to be targeted by developers as it has already with the Application for a Retirement village planned by Inaltus for Porter Homes.

THE LANDSCAPE CHANGES INCLUDING RIDGE HEIGHTS, FOOTPRINT OF PLANNED HOUSES ,HABITATS AND CARBON SINK LOSS.

620 *2.29 The dwellings are all proposed to be two storeys in height. The building heights have been reduced by 500mm from the original proposals in order to reduce the scale of development with the typical ridge height now extending to between 7.5 metres and 8.2 metres above Finished Floor Level (FFL), which is closer to the heights of the Zenda Park houses, which are approximately 6.8 metres high and those at 58 and 66 Quarterlands Road which have ridge heights of 6.3m and 7.2m respectively. As a result the roof profile of a number of units has been altered and dormers introduced however there is no change to the footprint of the dwellings.*

The proposed dwellings have Finished Floor Levels estimated to be around 0.25 to 0.5m above ground level. Therefore their ridge heights are between 7.75 and 8.7m above ground level. The comparison presented by the Developer is misleading as the Zenda Park height of 6.8m is taken from ground Level and the Development height should have been given using this same yardstick.

630 The rise in the site of about 2m from west to east increases the ridge heights of the proposed dwellings further above the Quarterlands Road level. The height of a house at the highest point on the proposed site could have a ridge height of 10.7m above the Quarterlands Road level, and therefore be 50% higher than the houses in Zenda Park and 100% higher than those in Rural Cottages. HOU4 point (i) (i)

The statement that there is no change to the footprint is misleading. From the floor plans the single storey extension previously noted as available is now a fixture attached to the main house in 14 of the 17 houses (excluding the social housing) .This is a sizeable area with a minimum 15.8 to 21.4m² with an average of 18.37m².

640 *2.30 Two recent developments on Sandyhill and Quarterlands Lane are both contemporary detached and semi-detached 2 storey houses and both of these developments sit comfortably adjacent and opposite their single storey neighbours. The proposed development adopts a similar approach to contemporary design as these existing two schemes, and the design changes have now introduced lower ridgelines and dormer windows to the houses by using elements of design from some of the older existing houses.*

650 The houses at Sandyhill and Quarterlands Lane have attic heights that are almost half those being proposed for the proposed development. Neither of these developments are on elevated ground. The houses in Quarterlands Lane had their site lowered by 1.5m to ensure the ridge height was comparable to those in Hambleden Park and now have flooding problems as a result. They were also sympathetically designed using the Key Design Consideration of not causing visual intrusion by minimising their ridge heights.

The proposed development makes a feature of aggrandising their prominence and lowering the already unnecessarily high ridge by 0.5m is not sufficient to base an argument of similarity.

[See Appendix 3 Planning History of Drumbeg](#)

2.31 The proposed layout of the scheme has been dictated by the existing overhead powerlines and associated pylons. Careful consideration has been given to the siting of the dwellings and development to avoid any conflict with the infrastructure.

660 The law requires accessibility for power engineers to maintain and repair high tension electricity routes. While way-leaves have been designed into the site plan for some of the overhead power lines, Unit 1 is sited below power lines.

2.32 Proposed structural and ornamental landscaping is used throughout the proposed scheme to promote integration and enhance the quality of the living environment for prospective residents.

(b) archaeological, historic environment and landscape characteristics/features are identified and, where appropriate, protected and suitably integrated into the overall design and layout of the development.

In the Design and Access Statement there is this paragraph:

670 *Built Heritage*

The site is not located within or adjacent to a Conservation Area or an Area of Townscape Character. There are no listed buildings in or within the setting of the site. There are no scheduled monuments within the site context and there is no evidence that the land is in an area of significant archaeological potential.

This says there is no evidence of archaeological potential which is contrary to section 2.32 that indicates there might be. How is it possible to integrate something that doesn't exist?

680 **The Rebuttal does not address how ornamental landscaping of 0.05Ha will compensate for the removal of 100m of Heritage Hedgerows and total scrubland loss of 1.1 Ha or the number of years required for such landscaping to mature to in any way mitigate the harm to the habitat, foraging and commuting corridors resultant from the removal of hedgerows and all tussocky grassland. In addition ,no recognition is given to the loss of the significant Carbon sink provided by this ancient hedgerow and land in the offsetting of the carbon from the atmosphere which will significantly increase with the potential for 69 cars /vans with energy production of fossil fuel burning along with that generated by heating at least 14 large houses with 3 smaller houses onsite. So this site development will not reduce Greenhouse Gases. It will clearly do the opposite which is against the Principles of LDP2032. Also the standing water (see our website and Case worker's report Appendix 1.5) and waterlogged spring areas are ideal for the 4 types of Bats found on the site .**

The scrubland acting as a soakaway into the aquifer below is not mentioned.

690 [SEE Q Appendix 4: Why Preserve the Place](#)

2.33 There are no protected archaeological, historic environment and/or landscape characteristics/features within or adjacent to the site. The site does benefit from a dense landscape buffer along the eastern boundary with the open countryside and the scheme proposes the retention, enhancement, and augmentation of the buffer to maintain a strong delineation between the development limit and open countryside beyond. The extensive landscape buffer will also assist in screening the development to the east and soften the impact of the development in the context of the surrounding built form.

700 There is already a strong delineation with the open countryside, so the proposed development will not assist delineation. If anything a manmade buffer is offensive as in exchange we lose 1.1 hectares of wild tussock grassland rich habitat and biodiversity and 100m of ancient Hawthorn hedging. In addition fencing will occupy all of the buffer Zone along with a significant part of the remaining border. Developing that manmade buffer Zone with fencing in situ will only be destructive to our biodiversity.

REBUTTAL STATEMENT PAGE: 8

710 *2.34 A portion of hedgerow will be removed and mitigated through the planting of native species and landscaping throughout the proposed development. The landscape features to be removed have been surveyed by a suitably qualified ecologist and determined to be of negligible ecological value. The total length of new hedgerows, combined with the additional hedgerow enhancement along the existing boundaries will provide a threefold increase to compensate for the loss of the internal hedgerow, representing substantial betterment, and also provide additional habitat enhancement onsite. The extensive putback of native species has been carefully considered and designed to enhance the biodiversity of the site post-development.*

720 No evidence is provided by the Developer to support their statement “to provide a threefold increase”. The reader may well ask “in what? The area loss will be over 1.1Ha of Priority Habitat not only above ground but all the ecology underground (2 fields not ploughed for at least 20 years). In addition as explained above they will be contributing negatively to climate change. They will be removing the riparian area that the 4 types of bats found in the area forage in and the soakaway will be removed entirely with no recognition of the destruction of the total habitat for wildlife that presently exists.

Negligible ecological values is insulting when we know all ecology is of critical value.

The LVRP (Dr. Andy Bridge) in his letter dated 30 March 2022 has already noted the harm which will ensue if planning approval is granted.

The NIEA Letter 6th January 2023 (which is not mentioned in the rebuttal) says

730 Quote “The development has the potential to harm NI priority Habitats and related NI priority / protected species and further ecological information is required.”

2.35 The proposal satisfies Criteria a) and b) of Policy HOU 3 as the analysis set out above demonstrates that the proposal will create a quality and sustainable residential environment which respects the existing site context and characteristics.

740 In the opinion of the Quarterlands Group which consists of residents and others who live beside and access the area regularly the proposal will remove hedgerows and grasslands which are essential for carbon capture as we work towards Net Zero. It also removes habitat, foraging and commuting corridors for a number of protected species. The Council in its LDP 2032 notes no issues relating to housing stock in its area and has as a key aim protecting and enhancing the LVRP. The Rebuttal does not address such matters.

The Biodiversity strategy for Northern Ireland 2020 contained 76 recommendations that were accepted by the Executive as Northern Ireland’s framework for action to halt Biodiversity loss.

“We need to be mindful where new housing developments are planned for this area as this is an incredible opportunity to protect what is precious today for future generations.” Paul Donnelly CEO NIEA.

750 A number of the residents particularly abutting the site chose to live here because the peace and quiet surrounding their homes is vital for their mental and physical health. They are extremely apprehensive as to what this development will mean for the area and their homes and mental health in particular. From an outlook of fields and wildlife to a plank fence, for one housebound resident will be utterly devastating.

NB. SUSTAINABLE DEVELOPMENT

SUSTAINABILITY OBJECTIVES (SO) for Lisburn & Castlereagh City Council (LCCC) LDP 2032

The four pillars of sustainability are Human, Social, Economic and Environmental.

HUMAN SUSTAINABILITY

Human sustainability as the name suggests, is focussed on people.

SO1 Improve health and wellbeing

760 The aim is to improve health and wellbeing by creating an environment that is clean and attractive by minimising the detrimental impacts of noise, improve mental health protects tranquil and quiet areas and enables access to health care facilities for all. None of these operate in this application.

SO2 Strengthen Society

Another aim to strengthen society is represented by places which are inclusive, respect culture and identity, and promote social integration and create a sense of place. Those living in the area of social housing will not feel safe within a Shared Street Arrangement designed to cause accidents (Lord Holmes Report). With over 400 objections and more than 1500 signatures on our change.org petition by the local residents this pillar is of questionable significance.

SOCIAL SUSTAINABILITY

770 Social sustainability has a goal of creating and proving social systems that make up the framework of the societies we live in. Here we look at the bigger picture, using a global perspective to consider communities and cultures. Social sustainability works to protect the future generations by reminding us of the impact of our actions if we aren't considerate. These houses are planned for part of the Lagan valley Regional Park an area of natural beauty. With the adoption of the LDP2032 the LCCC along with other Stakeholders are charged with its Preservation, Protection and enhancement for all users associated with it including their mental health.

SO3 Provide good quality, sustainable housing

780 Design needs to meet long term requirements with good quality build to be sustainable. The makeup of houses is changing. The needs of those on the LCCC waiting list for houses is for 1 or 2 bed houses not 5 bed unaffordable homes for the average worker with a young family or single person or retired people. They need to be accessible and balance the needs of society and the environment. The application is a car driven development as can be seen by the 58 car/van parking spaces on site excluding vehicles in 11 garages and the poor public transport infrastructure. The environment will also suffer.

SO4 Enable access to high quality education.

There are no schools in Drumbeg. The bus service on the Ballyskeagh Road is infrequent not run at peak times. The nearest school is 3 miles from the site which is a car driven development with at least 58 car/van parking spaces on the proposed site.

ECONOMIC SUSTAINABILITY

790 Economic Sustainability refers to practices that support long-term economic growth, without impeding on the other sustainability pillars. This section is focused on efficient use and pragmatic management of resources. Large 5 bed homes would not fall into this category. **SO5, SO6 and SO7.**

Aims are to **Enable sustainable economic growth, Manage material assets sustainably, and Protect physical resources and use sustainably.** Five bed homes will not reduce unemployment and poverty by helping more people to earn a living and increase their income. There is no significant infrastructure within the area (1 pub/restaurant, 1 church). To promote sustainable Tourism support

of the Wild Life and Landscape are uppermost Thus Sustainable tourism will not help the economy as people will not be attracted to the :Park with these large houses in an area of natural beauty.

800 ENVIRONMENTAL SUSTAINABILITY SO8 – SO14

Environmental sustainability is what jumps to mind when the word “sustainability” is used. It is concerned with all natural environments and eco systems and these have crucial connections to us that we rely on.

SO8 To encourage active and sustainable travel better access to public transport is non existent in this proposal. Walking and cycling advocated to achieve this goal are hazardous with a Shared Street Arrangement. So Transport will be car driven with resultant noise and air pollution from at least 58 vehicles driven by the residents

810 **SO9 To improve air quality through reducing sources of air pollution.** Air pollution has serious impacts on human health as well as degrading the natural environment. However air pollution will be increased for example by the number of humans in these houses, burning fossil fuels and cars, vans and emergency vehicles accessing and exiting the site.

SO10 Reduce causes of and adapt to climate change

International commitments require greenhouse gas emissions to be reduced to lessen their effects on climate. Measures that help reduce energy consumption and enable renewable energy help mitigate greenhouse gas emissions . However adaption is also required to plan for the impacts of climate change.

Carbon dioxide emissions primarily occur through human activities (mainly combustion of fossil fuels). The main sources are transportation and energy production all of which will increase significantly with this development.

820 By removing the 165 year old + hedge in the centre of the site which is more than 100m in length and approx. 5m height, to destroy the boundary habitats and the 1.1Ha of scrubland you are removing a large **Carbon Sink** as carbon dioxide is removed from the atmosphere and stored in plants and trees. In USA 2021 this Carbon Sink offset removed about 13% of the total carbon dioxide emissions. The promotion of carbon sinks are emphasised in LDP2032 in order to help get to Ground Zero and reduce climate change. Thus the LCCC by preventing the removal of this large Heritage hedge and scrubland will be honouring the principles adopted in the LDP2032.

SO11 Protect, manage and use water resources sustainably.

830 The aims of LDP 2032 are to reduce levels of water pollution, sustainable use of water resources, improving the physical state of the water environment and reducing the risk of flooding now and in the future. The new legislation meets the requirements of N.Ireland legislation, strategies and plans in support of the Water Framework Directive and other Directives that relate to water and it takes account of the future impacts of climate change.

The applicant states that “ that there are no watercourses within or immediately adjacent to the application site” (D&A P5 December 2023)

DRUMBEG LIES ON THE SHERWOOD AQUIFER.

[SEE Q APPENDIX 6: The Aquifer](#)

At the Drumbeg Drive WwTw the Sherwood aquifer was found just 10m below ground level which caused difficulties in upgrading that WwTw. The present standing water on the site lying on the scrubland is likely to be related to that Aquifer possibly by springs.

- 840 This sponge area (soakaway likely into that aquifer) will be totally removed by the Developer and replaced by many hard surfaces thus increasing the risk of flooding to houses in the immediate vicinity but also on to Quarterlands Road.

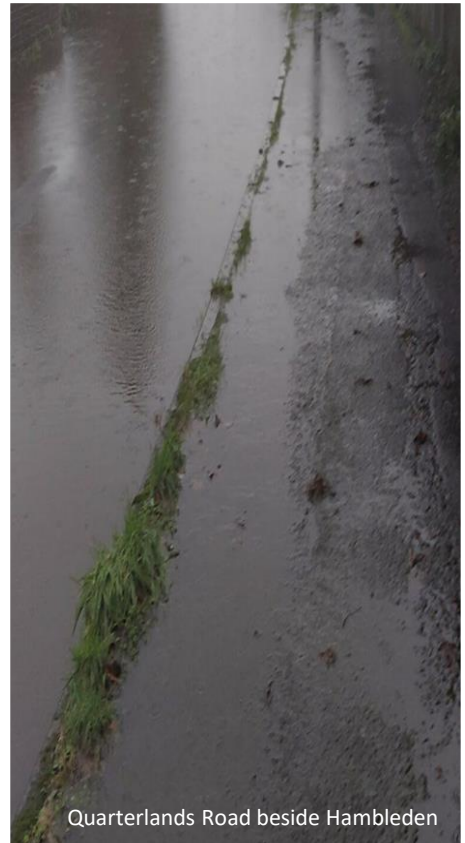
Recently episodes of flooding have occurred in the Quarterlands Road (see below) following heavy rains which are now a regular and increasing feature of our climate change.



Quarterlands Road Adjacent to the site access point.



Quarterlands Road beside proposed site access



Quarterlands Road beside Hambleden

SO12 Protect natural resources and enhance biodiversity.

850 International obligations which are adopted in Northern Ireland Legislation and Policies require the protection of biodiversity including flora, fauna and habitats. This is for their intrinsic value and for the wider services that they provide to people, the economy and the environment for example as carbon stores which lessen the effects of climate change. This objective includes protecting and enhancing biodiversity as well as protection of green and blue infrastructure to enhance the services that natural resources provide.

The Lagan Valley requires the protection and enhancement of biodiversity as we have outlined in our Rebuttal to the Aecom October 2023 report.(see attached)

SO13 Maintain and enhance landscape character.

860 International and national policies seek to conserve the natural character and landscape of the countryside and **protect them from excessive inappropriate or obtrusive development**. This objective seeks to maintain the character and distinctiveness of the areas landscapes and to protect and enhance open spaces and the setting of prominent features, settlements and transport corridors.

This Development is in an Open Space of 2 fields in the Settlement of Drumbeg with its Green Corridors providing Flight Paths and Foraging for Barn Owls, Bats many mammals along with Hedgehogs, Badgers. insects, butterflies, moths to name but a few.This Green corridor operates from Drumbeg to the Lagan over open fields and from the Lagan to Drumbeg.

[SEE Q APPENDIX 8: BATS](#)

870

SO14 Protect, conserve and enhance the historic environment and cultural heritage.

The historic environment and cultural heritage are resources that inform our history and bring character and sense of place. They also attract visitors and contribute to the economy and bring vibrancy to the places where we live, work and relax. This can be achieved by protecting and enhancing Conservation Areas, townscapes and other sites of historic and cultural value including their setting.

The Sense of Place emphasised in this Sustainability Objective 14 is what we wish to maintain and enhance by our objection to this planning Application.

880 The over-arching goal of the Environmental Pillar is to ensure the needs of the population are sustained without risking those of the future generations and not the destruction of the wildlife. The removal of the 1.5 centuries +old hedge and the 1.1 Ha of scrubland (large Carbon sink) along with all their associated eco systems will promote rather than prevent climate change. To reduce Green House gases from the atmosphere (mainly CO2) by the removal of carbon which has gone on in this ancient hedge and scrubland for 1 to 2 centuries will now cease .This is totally against the principles

of LDP2032. The mitigation suggested by the developer is a manmade buffer zone of 0.05Ha against the removal of 1.1 Ha scrubland and the 1 ½ centuries +old hedge, are not comparable.

SO, WHAT SHOULD ONE DO?

890 It is important to understand that sustainability is not a box to tick. It is a large ongoing journey towards a goal that takes time, money and a whole lot of effort to integrate if we are all going to play our part in reducing not exacerbating the effects of climate change.

900 *2.37 The existing layout of Drumbeg West village clearly establishes a hierarchy of house types (Appendix 2 – Drumbeg West Village Plan House Heights NTS), with the single-storey ‘bungalow’ typology located in the centre of the area, creating a core of low-rise dwellings set back from the main road, the motorway and the two rural edges. On the east side of this central core, this is reinforced by the fact that these houses face inwards into the smaller streets of Hambleton Park, showing a ‘faceless back’ onto Quarterlands Road, from where these houses can barely be seen over the fences and hedges. The edge conditions contain most of the taller and more various types of housing, protecting and enhancing the character of the central part of the village. This current arrangement of low-rise core and higher ‘edge’ buildings would be reinforced by the proposed development of 2 storey dwellings to the eastern side. The scheme as designed will follow the existing village traditional form by completing the encapsulation of the low-rise homes in the central core with higher rise multiple storey homes around the edges. The proposed development would also be largely screened from view by the houses along Quarterlands Road and the 2 storey semi-detached houses within the Zenda Park cul-de-sac.*

910 **CORRECTION – Disingenuous, Zenda Park homes are 1.5 storey Chalet Bungalows not 2 storey semi-detached houses. The proposed development will tower over them and will dominate the Landscape from Quarterlands Road. The Rebuttal information is not accurate, nor correct and is misleading. Eighty five % (34 of the 40 houses) in the immediate vicinity of the potential development site are 1 or 1.5 storeys. All the adjoining houses are 1 or 1.5 storeys.**



LA05/2022/0033/F
Proposed development showing the relative heights of surrounding buildings.

<p>Key:</p> <ul style="list-style-type: none"> ● 19 - Single Storey homes ● 15 - 1.5 Storey homes ● 5 - 2 Storey ● 17 - Proposed 2.5 Storey ● 1 - Existing 2.5 Storey 	<p>Please also note that the land slopes upwards from here, by about two metres across the site, not downwards.</p>
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920 Appendix 2 in the Rebuttal Report is an aerial photograph which does not show any heights. It ignores the majority of the single storey properties in the photograph by not highlighting them at all. It does however highlight all the two storey properties and erroneously includes the three storey buildings in Drumbeg cottages in their two storey designation. Interestingly those three storey dwellings have lower ridge heights than the proposed development. Appendix 2 is also misleading as it includes properties that lie outside the Drumbeg Site Development Limit.

The reason for the proposal to screen the site is of concern to residents who feel that it is required because the proposed development is so incongruous with the neighbouring properties.

The Rebuttal notes that the site will 'largely' be screened without clarifying what 'largely' means.

930 *2.38 The proposed development in this case takes a contemporary approach to design, the houses designed with a more sustainable smaller footprint and more attractive and efficient provision of 2 full storeys of usable space.*

The footprint is not smaller. From the recent iterations from the developer the footprint has increased. From the floor plans the 1 storey extension available is now a fixture to the main house in 14 of the 17 houses measuring minimum 15.8 maximum 21.4 mean 18.37m²

The reason for the height of the houses seems linked to what the developer calls the smaller footprint disingenuously. There is no regard for how the houses will dominate the local area.

The houses in the development in Sandyhill feted in the Rebuttal Report have the substantially smaller footprint, are two storey but have lower ridge heights. The Sandyhill development is deemed therefore to be 'more sustainable' than the proposed development which clearly falls short by comparison. It is also quite a distance away from this proposed development beyond Hambleton.

940

Sandyhill

2.39 This modern approach is already seen in two other developments in West Drumbeg – at the entrance to Sandyhill, alongside the motorway are 5 x two storey houses with expressed corner and dormer-style windows, which accommodate the full footprint area on each level. To the south of the settlement are 8 x large two storey houses, on Quarterlands Lane, which use relatively low-pitched roofs, with full height walls to the eaves and no dormer windows.

In an area with around 150 houses the Developer chooses to compare their new development to 13 two storey houses, that have mitigated their impact on their skyline and are much more sympathetically designed.

950 Interestingly, the Rebuttal does not compare the proposed housing development to the existing No. 66 Quarterlands Road, which is a modern building right beside the proposed site and despite being lower in height than the proposed new houses still looks inappropriate in the context of the built environment around it.

REBUTTAL STATEMENT PAGE: 9

2.40 Increasing insulation and heating requirements, combined with the pressing need to provide new homes means single storey houses are land hungry, inefficient, and do not contribute to creating more sustainable settlements for the future.

960 Bungalows do have a larger footprint than houses of a comparable square footage, increasing the land cost associated with them. As at March 2022 the rule of thumb is that costs approximated to 15% more per sq foot to build a bungalow compared to a normal two storey house. Research by McCarthy Stone, specialist developer of housing for pensioners, found that the number of bungalows built in the U.K. is plummeting as demand increases. Just 1,833 new bungalows were built in 2020, a fall of 23% compared to 2019 and less than 1% of all new homes built (March 2021). As demand increases for bungalows, particularly as the population ages, the attitude expressed in paragraph 2.40 will become increasingly dated and unsustainable. The argument made about sustainability would have more credibility if the proposed development was on a ~~is~~ brown field, rather than a green field site.

970

2.41 The majority of the 1.5 storey dwellings in this area appear to have originally been constructed as single storey buildings and roof extensions have been added over time. Some of the 2 storey dwellings have also evolved from single storey, however the majority of these were originally built with upper levels in place. The 2 storey dwellings present a variety of upper-level window types including traditional windows in walls; large flat-roofed dormers; smaller scale flat or pitched roof dormers; gable end windows; and Velux-style roof-light windows (usually added post-construction).

The Rebuttal lacks data to support the Developers claims made in paragraph 2.41.

980

2.42 The dwellings in the surrounding area also exhibit a range of different roof profiles and no one particular form is prevalent or dominant. The house types are generally designed with pitched roofs with a number of the units availing of dormer windows which break up the eaves and roof planes. Several of the houses, towards the site entrance and in the most prominent area of the site from critical views, are proposed to have unique roof profiles.

The vast majority of the dwellings in the surrounding area conform to the Key Design Consideration of **LAP 2001** Plan by avoiding visual intrusion.

The variety of roof style is not as noticeable as inconsistency in height.

990

2.44 The dwellings are proposed to be finished in a mix of red brickwork and smooth sand/cement render with traditional pitched roofs finished in blue/grey or brown tiles with clipped eaves. All windows and doors will be double-glazed uPVC and rainwater goods are also proposed to be uPVC.

The Rebuttal majors on the proposed houses being 'sustainable' buildings. No information is provided on the likely use of building materials and how many will not be produced from fossil fuels.
HOU 4 F

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The Rebuttal makes no reference to the carbon capture which already exists on the site. A recent consultation by Defra ([https://consult.defra.gov.uk/legal-standards/consultation-on-protecting-hedgerows/supporting_documents/Consultation on Protecting Hedgerows June 2023.pdf](https://consult.defra.gov.uk/legal-standards/consultation-on-protecting-hedgerows/supporting_documents/Consultation_on_Protecting_Hedgerows_June_2023.pdf)) notes that hedgerows 'are crucial for climate adaptation and storing carbon and are a key part of our Net Zero commitment' (Introduction). Ignoring wider issues relating to sustainability resulting from progressing the planning application is regressive.

1010

2.45 The palette of materials found in the local built context is varied, including red brick, render (smooth and coarse) and various types of cladding materials and finishes. The proposed palette of materials will be highly compatible with the existing local housing, including the dwellings within Hambleden Park, Zenda Park and along Quarterlands Road, which are also finished with the same materials.

The Rebuttal chooses to compare some of the proposed characteristics to modern design and at other times compare them with traditional design to infer a harmonious gel between what is proposed against what currently exists.

1020

2.46 The mix of house types with a variety of finishing, roof profiles and finishes, offer a modern, contemporary design which complements the surrounding built context. The variation in house type finishes between brick and render will help to create interest in the streetscape and a variation in finishes is also exhibited in the dwellings neighbouring the site along Quarterlands Road and within Rural Cottages.

(b) Landscape areas using appropriate locally characteristic or indigenous species and private open space must form an integral part of a proposal's open space and where appropriate will be required along site boundaries to soften the visual impact of the development and assist in its integration with the surrounding area: -

The decision on whether the design complements or clashes with the surrounding built context is a matter for the Planning Committee. To soften the visual impact, the Developer would need to transplant 30 foot high trees along the boundaries given the height of the houses for which approval is sought.

1030

REBUTTAL STATEMENT PAGE: 10

2.47 Private amenity space will be provided for proposed dwellings in the form of private gardens to the rear of the dwellings. The garden spaces range from a minimum of 85sqm to a maximum of 450sqm, not including the landscape buffer planting. The average private garden size across the dwellings is approximately 211sqm. The level of amenity space for each of the dwellings within the scheme is significantly better than the standards set out in the Creating Places document. The dwellings will also enjoy the provision of defensible space to the front of the plots which will benefit from passive surveillance and support clear delineation of private and public spaces.

1040

The spirit of the Creating Places document is not to create large tenth-of-an-acre private gardens at the expense of natural habitat. The Rebuttal takes no account of the loss of habitat, heritage hedgerows and foraging required to create private gardens which will not add to biodiversity or to a sustainable rural community.

SPG-RNI 1: To create and sustain a living countryside with a high-quality life for ALL its residents

NOT just the residents in the new houses.

SPG-ENV 4: To foster a stronger community spirit and sense of place in relation to local development proposals in urban and rural areas by the use of Local Development Guideline.

1050 The proposed development does nothing to create and sustain a high quality of life for ALL residents as it is envisaged that foul sewage, flooding and traffic problems will be increased as a consequence of acceding to this application. The loss of green areas and adverse impact on biodiversity will not sustain the health and well-being of residents. Nor does it provide for a strong community spirit as there is nowhere to meet and chat to promote community.

2.48 The siting of the homes, planting and layout of the internal road have all been designed to help control the speed of vehicles and aid the concept of shared space which makes clear to drivers that they are in an area where the needs of pedestrians and cyclists will take priority. By creating a pedestrian dominated environment the shared surface effectively becomes the open space for the development The matter of public open space is addressed further under Policy HOU5 later in this Statement.

1060 The lack of footways is a serious accident risk. - the internal carriageway within the development transitions into a shared surface arrangement, which the Holmes report on shared spaces considers to be accidents by design ('accidents by design: the Holmes report on "shared spaces" in the United Kingdom, Lord Holmes of Richmond MBE, July 2015)

SEE APPENDIX 1 : SHARED SURFACE ARRANGEMENTS

2.49 Given the site's location within the Lagan Valley Area of Outstanding Natural Beauty (AONB) and the Lagan Valley Regional Park, careful consideration has been given to the integration of the development to this setting.

1070 At Para 2.6 the Rebuttal states: 'The planning application site is whiteland within the settlement limit of Drumbeg and is not located within the Lagan Valley Regional Park (LVRP).' (Highlighting added) Now the Rebuttal states it is within the LVRP and notes it is an AONB. The contradictory nature of these comments possibly explains why no regard has been afforded to the objection of the LVRP to this proposed development.

Another example of incorrect and contradictory Rebuttal information.

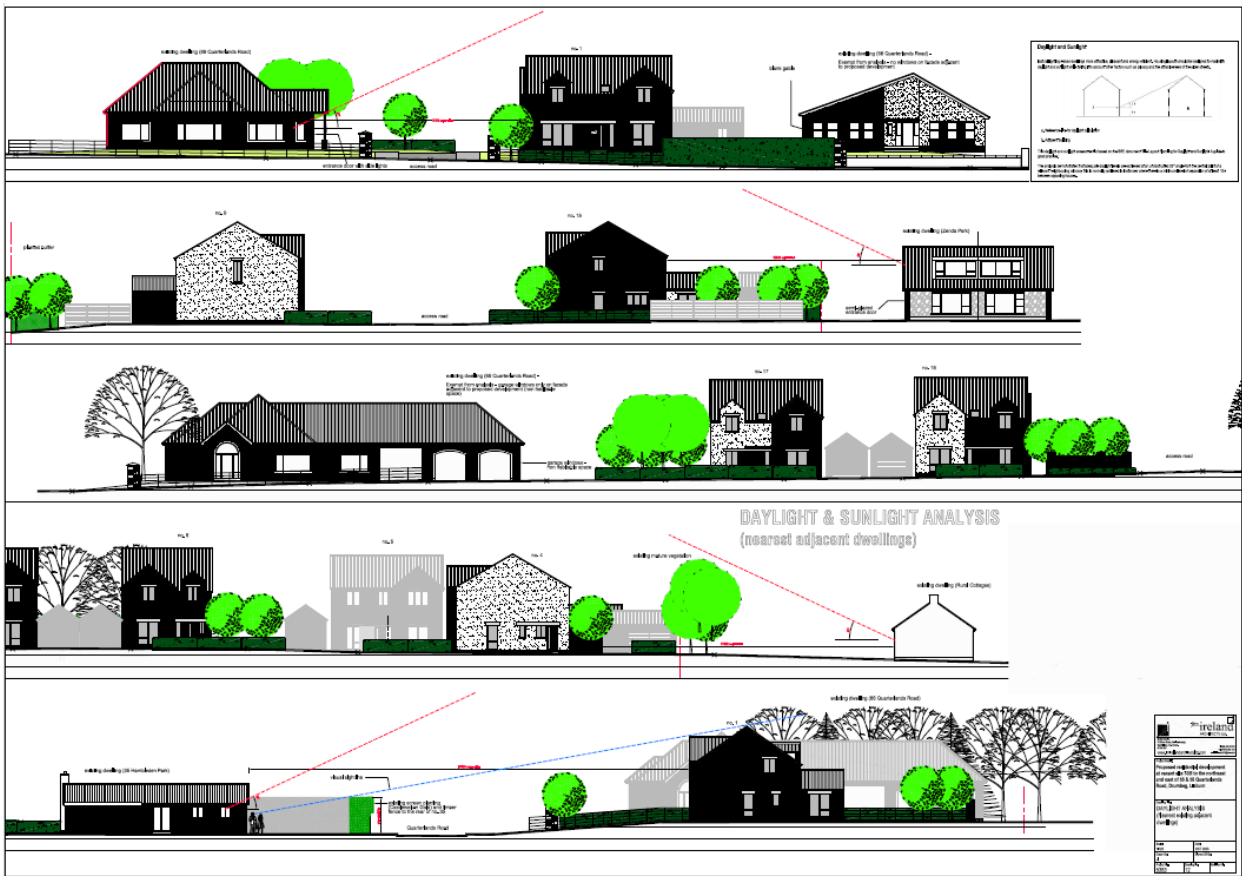
It is also unclear what, if any, consideration was given to the Key Design Consideration to minimise visual intrusion.

2.50 The application site is located within the settlement limit and the existing built form surrounds the site on three sides which forms the setting and context of the proposed development from all public views of the site. The existing development provides a clear

sense of continuous built form, and the proposed development will integrate into this context when viewed from the north, east and south. The proposal will be absorbed into the existing context and not result in any significant visual intrusion into the landscape.

The view expressed by the Developer is subjective.

The proposed development clearly does not have any empathy with the Key Design Consideration to minimise visual intrusion and will tower over the houses to the North, West and the cottages to the South of the site see below (fig from light analysis 35 Hambleton Park and Rural Cottages to site1) Views from the farmland to the East may be mitigated by the longer distance between them and the site.



2.51 The application site does not extend any further east than the current extent of built form defined by the dwellings at Rural Cottages. The layout of the proposed development and siting of dwellings within the site ensures that a compact built form is maintained and there is no perception of visual or physical intrusion into the undeveloped gap between the eastern and western sections of Drumbeg village.

The current house at No.66 Quarterlands road has a ridge height lower than the proposed houses and it looks incongruous with the neighbourhood skyline so there will be an obvious perception of both visual and physical intrusion. This is especially apparent on the whiteland beside the Quarterlands Road and the height differences as set out in Appendix 3.

1100

2.53 A key aim of the landscape strategy for this development is the creation of strong and sustainable ecological linkages to the surrounding countryside and improving the current ecological value of the land as a rich woodland edge.

The removal of 1.14 Ha of mature grasslands and 165+ year old heritage hedgerows which provide habitats, foraging and commuting corridors and a large carbon sink ,to replace with 17 houses, hard standing, internal road systems and manicured lawns does not improve the current ecological value of the land. The claim made in this respect is not supported by the facts associated with the ecological costs of developing the site.

1110

REBUTTAL STATEMENT PAGE: 11

2.55 The total length of new hedgerows, combined with the additional hedgerow enhancement along the existing boundaries will provide over a threefold increase to compensate for the loss of the internal hedgerow, representing substantial betterment, and also provide additional habitat enhancement onsite.

No figures are presented to support the claim of a threefold increase in hedgerows. The volumes of existing accessible hedgerow compared to what will be planted is not stated. Nor is the time lag provided on the length of time it would take for new hedgerow plantings take to become established and become equivalent habitat conditions to what currently exists.

1120

The Rebuttal fails to address the acknowledgment in the mitigation section of the AECOM Report of potential harm to retained hedgerow as a consequence of construction activity. It is also silent on the impact of removing all grasslands (over 1 Ha) and the absence of mitigation for same.

SEE Q APPENDIX 5: AECOM REPORT AND NIEA LETTER DISCREPANCIES: CRITICAL OBSERVATIONS

2.57 There are no Key Site Requirements attached to the site which require the provision of local community facilities as part of the development.

1130

The whiteland under power lines fronting the application site is not designated as zoned for housing therefore there could be Key Site Requirements attached to that part of the potential development if it were ever considered to be zoned for housing. The LDP 2032 adopted in September 2023 does set out requirements for community facilities in terms of links to transport systems, employment and enhancing community health by protecting and promoting the LVRP.

NO SEWAGE CAPACITY AT DRUMBEG WWTW

Drumbeg wastewater treatment works has been at capacity since at least 2018 Since then at least 10+ new houses have been built that are served by the DrumbegWwTw. There are also no

1140 enhancement plans for the Drumbeg waste water treatment facility. In December 2022 NIW in a letter to Emma Little-Pengelly indicated that as the Drumbeg WwTw was at capacity no new connections could take place. A further letter to David Honeyford MLA, dated 2 February 2023 (case reference number DH249 and CMS reference 9200123/56542) stated 'that Drumbeg WwTw is currently operating at capacity. As a result, any new planning applications received by NI Water for consultation will receive a negative response, with a recommendation for the planning authority to disapprove the application'.

2.58 Policy outlines the following density bands:

Settlement development limits of villages and small settlements 20-25 dwellings per hectare.

Settlement development limits of towns and greater urban areas 25-35 dwellings per hectare.

City centre boundary 120-160 dwellings per hectare.

1150 A town's lower limit is 25 dwellings per hectare. For Drumbeg a small settlement of 20 dwellings per hectare would be comparable.

2.59 The proposed development has a density level of 15.5 dph which is below the range for development within a village. It is worth noting that within the supporting policy Justification and Amplification it notes (at page 14) that these bands will be used as a guide to inform development proposals within settlement areas and proposals outside of these bands will be considered on their own merits.

1160 **The whiteland at the front of the site is not zoned for housing and therefore should be excluded. The whiteland represents about one tenth of the total land area, therefore, enabling only 16 houses to be built should the application be approved. The ratio would be 16 dwellings per hectare not 15.5.**

2.60 The density of the neighbouring development, Hambleden Park equates to 15.2dph and is marginally higher than the wider Drumbeg West area which equates to 14.75dph.

The proposed dwellings per hectare are of similar density to local single storey houses the proposed two storey development is not more sustainable as claimed particularly at paragraph 2.40 but also paragraphs 2.22, 2.35, 2.38, and 2.54.

1170 *2.61 The pattern of development is in keeping with the overall character and environmental quality of the established residential area which is defined in the Plan Strategy as "residential neighbourhoods dominated by medium to low-density single-family housing with associated private amenity space or gardens. These areas may include buildings in commercial, retail or leisure use, usually clustered together and proportionate in scale to the size of the neighbourhood being served."*

The proposed development's proportionality in terms of density, does not address its proportionality in terms of building unit scale.

NOTES ON HOUSING TYPES

- 1180 • Housing Executive Commissioning prospectus 2023/2024 to 2025/2026 indicated that in Northern Ireland the population continues to age in that the population greater than 65 years in 2021 was 17% compared with 15% in 2011 and the differential continues to increase.
- **The Housing Executive considers that rural areas include “all settlements with a population below 5,000 and the open countryside”. Thus Drumbeg is rural.**
- In the Census (2021) LCCC had a population of 149,106 residents in 60,147 households and covering an area of 200 square miles. For new build developments the emphasis is on the requirement to cater for singles, small families and older persons not 5 bed houses.
- Overall demographic trend in LCCC area is for an aging population, and for small household size (1-3 persons).
- 1190 • Future need is predominantly for 1 and 2 bedroom design forms with an emphasis on accessibility.
- On the waiting list for houses in LCCC area single, older and small family households make up 85% on this list.
- Therefore the trend for new dwellings in LCCC is for smaller 2 bedroom households – where possible 1 bed properties.
- For social housing with wheelchair users the generic wheelchair unit provision target should be 10% of any new development. For wheelchair accessible housing needs the generic wheelchair (standard) is 36” tall, 25” wide and 32” long.
- 1200 • Generic wheelchair units should be 2 and 3 bed units and built in line with the space standards included in the Housing Association Guide. Thus 10% of units within any new development should be designed to wheelchair standards.

REBUTTAL STATEMENT PAGE: 12

2.62 It is our consideration that the density of the scheme makes a significant contribution to the overall quality and setting of the proposed development and that the density is appropriate to the site's location and respects the surrounding established built context and pattern of development.

1210 The Rebuttal refers to ‘our consideration’, this is a subjective view. As such it cannot ignore the Key Design Consideration to avoid visual intrusion. HOU 4 (i)

NOTE: INACCURATE LEVEL CHANGE

2.66 The site experiences a gentle level change.

The Rebuttal claims the site has a gentle level change of 1 metre. The level change is virtually 2 metres according to the Case Officer (M-C O'Neill) Appendix 1.5 Inaccuracies like this erode the degree of confidence which one can place on the claims made by Turley's in respect of this application;

1220

2.67 Measures have been incorporated into the design of the development to deliver a high standard of energy efficiency and reduce carbon emissions. All dwellings have been designed with large windows to maximise natural light and solar gain to habitable rooms.

2.68 The dwellings will be constructed to comply with the requirements of the Department of Finance's 'Technical Booklet F1 – Conservation of Fuel and Power in Dwellings' June 2022, which sets the current standards for energy efficiency requirements. Buildings are also designed with a high thermal mass to absorb the heat produced by the building and release it over a period of time.

No information is provided for heating the proposed houses. It is not known whether they will rely on fossil fuels to heat them. In the interests of reducing carbon emissions should new houses be required to use a more eco-friendly energy source.

1230

HOU4 Design in New Residential Development (g) A proposed site layout must indicate safe and convenient access through provision of walking and cycling infrastructure, both within the development and linking to existing or planned networks; meet the needs of mobility impaired persons; and respect existing public rights of way: -

TRA8 From LDP2032 Active Travel Networks and Infrastructure Provision. **Planning permission will only be granted for proposals where public transport, walking and cycling provision form part of the development proposal.**

A Transport Assessment/Travel Plan or, if not required, a supporting statement should indicate the following provisions:

1240

a) safe and convenient access through provision of walking and cycling infrastructure, both within the development and linking to existing or planned networks

b) the needs of mobility impaired persons.

c) safe, convenient and secure cycle parking.

Justification and Amplification

Active travel can help to mitigate and adapt to climate change, improve connectivity and promote more sustainable patterns of transport and travel that reduce the need for motorised transport. In accordance with the Strategic Planning Policy Statement (SPPS) the Council will, through its Local Development Plan encourage active travel networks, primarily focused on cycling and walking.

Proposals should also demonstrate safe and convenient access arrangements to the public transport network.

1250 The Bicycle Strategy for Northern Ireland, published by the former Department of Regional Development in 2015, now the Department for Infrastructure, sets out how Northern Ireland can be transformed into a place where travelling by bicycle is a healthy, every day activity. It seeks to achieve this through the building of a comprehensive bicycle network, supporting those who choose to travel by bicycle and promoting it as an alternative mode of transport for everyday use.

Like walking, cycling is healthy, pollution free and makes relatively small demands on land. Walking and cycling have the potential to replace the car for short journeys and to form part of a longer journey when linked to onward travel by sustainable public transport.

This policy supports active travel by promoting the provision of safe, and convenient linkages to and from development proposals to wider sustainable transport networks.

1260 Secure cycle parking should be available in town and district centres, employment sites, educational institutions and public transport interchanges, including Park and Ride and Park and Share sites.

Cycle parking provision in association with residential development is addressed in Policy HOU4, Main Elements of Design and the Department's design guide 'Creating Places – Achieving Quality in Residential Developments' (May 2000).

The **Shared Surface Arrangement** planned by the Developer in no way will allow safe walking or cycling as there are no footways. Kerbs have been removed separating Pedestrians and cyclists from motorised transport. No one therefore knows who has "Right Of Way" .. Regarding the Social Housing occupants, i.e those in wheelchairs, mobility scooters, poor or no eyesight and those with Mobility problems would not be safe as shown by the number of accidents recorded in similar areas in the UK assessed by the Lord Holmes report. Furthermore ,those taking young children to school would be unable to use the in-curtilage road safely as they are likely to suffer accidents. This development is a car based Community with 14 on Street Parking areas adding to the high risk for all pedestrians and cyclists as they try to negotiate around these road obstructions in the presence of on-coming or exiting Traffic. The remainder of the 54 car parking spaces in driveways will add to the traffic in the carriageway and are a significant road hazard to non -car users particularly when passing parked cars in the allocated on-street car parking areas.

1270

For Public Transport as there is only 1 Bus travelling each way daily not at peak times this cul de sac development will be virtually totally dependent on cars. The nearest bus route is on the Ballyskeagh Road. For disabled people trying to access the public transport system using this Shared street arrangement not only will they risk their physical health but the mental stress will ensure they remain isolated in their homes (Lord Holmes report).

1280

In Summary Public Transport system accessible to the site residents is poor, walking and cycling provision are both hazardous in the presence of a shared surface arrangement according to the Holmes audit report provided for all UK areas. Therefore TRA 8 is not satisfied.

1290 *2.69 The site is proposed to be accessed from Quarterlands Road, an existing public road. The vehicular access and internal carriageway are designed to adoptable standards with the exception of a private driveway arrangement serving dwellings 3, 4 and 5.*

The reason for the exception for this small area is not provided, nor is information available on whether it will be built to adoptable standard or the responsibility of DOE Roads for resurfacing the adopted part of the Road and a private driveway that leads to 3 private driveways.

No information is provided on the maintenance of services on the site, such as street lights. It is not clear if residents will have to have their own private site service contracts.

1300 Residents have significant concerns about the access onto Quarterlands Road and its adequacy to cope with enhanced traffic. The traffic survey provided by the Developer averages traffic over a 12 hour period with no estimates at peak times and the potential for tail backs out of the site and at exit points onto the Ballyskeagh or Hillhall Roads, potentially creating increased traffic pollution in terms of fumes and noise.

1310 *2.70 The access onto Quarterlands Road makes provision for returning footways and a Pedestrian Crossing Point (PCP) to facilitate safe pedestrian movements along Quarterlands Road and into the development. Two additional PCPs are also proposed to the north and south of the site access. The PCPs will provide safe crossing points to the existing footpath on the western side of Quarterlands Road.*

“A proposed site layout must indicate safe and convenient access through provision of walking and cycling infrastructure”. There is no information on the proposed cycling infrastructure. With vegetation proposed as a traffic calming measure cyclists would be at increased risk of not being seen by motorists.

HOU 5 Public Space in New Residential Development

2.94 The application site marginally triggers the requirement to address this policy due to its size 1.1 hectares.

1320 2.95 -2.96 Where there is a possibility to create a village green or children’s playground the Council Planning team have advised against this and have deprived Drumbeg of improved amenities for all residents.

The pavement access along the Quarterlands Road is in two sections requiring the crossing of the road to access each section. From a road safety perspective this increases risks to pedestrians who decide to keep to only one side of the road rather than crossing it. With increased traffic flow the potential for accidents will increase.

2.72 The internal carriageway then transitions into a shared surface arrangement which is considered appropriate for this low-density cul-de-sac.

1330

THE INTERNAL CARRIAGEWAY WITHIN THE DEVELOPMENT TRANSITIONS INTO A SHARED SURFACE ARRANGEMENT, WHICH THE HOLMES REPORT ON SHARED SPACES CONSIDERS TO BE ACCIDENTS BY DESIGN ('ACCIDENTS BY DESIGN: THE HOLMES REPORT ON "SHARED SPACES" IN THE UNITED KINGDOM, LORD HOLMES OF RICHMOND MBE, JULY 2015)

The shared Street Arrangement planned by the Developer in no way will allow safe walking or cycling as there are no footways. Kerbs have been removed separating Pedestrians and cyclists from motorised transport. No one therefore knows who has "Right Of Way".

[See Appendix 1 : Shared Surface Arrangements](#)

1340

Regarding the social housing occupants i.e. those in wheelchairs, mobility scooters, poor or no eyesight and those with mobility problems would not be safe as shown by the number of accidents recorded in similar areas in the UK assessed by the Lord Holmes report. Furthermore, those taking young children to school would be unable to use the in-curtilage road safely as they are likely to suffer accidents. This development is a car based proposal with 14 on Street Parking areas adding to the high risk for all pedestrians and cyclists as they try to negotiate around these road obstructions in the presence of on-coming or exiting traffic. The remainder of the 548 car parking spaces in driveways will add to the traffic in the carriageway and are a significant road hazard to non-car users particularly when passing parked cars in the allocated on-street car parking areas.

1350

For Public Transport as there is only 1 Bus travelling each way daily on the Ballyskeagh Road B103 not at peak times public transport system is poor. This cul-de-sac development will be almost totally dependent on cars. The nearest bus route with more frequent buses is on the Drumbeg Road. For disabled people trying to access the public transport system using this Shared street arrangement not only will they risk their physical health but the mental stress will ensure they remain isolated in their homes (Lord Holmes report).

REBUTTAL STATEMENT PAGE: 16

2.92 The buffer strip is retained and augmented as a densely populated woodland edge that will be enclosed with post and wire fence, overlooked by the housing backing onto it and

maintained by a management company. There will be no access to, or access within, the buffer strip.

1360 The Rebuttal Report states that a management company will be responsible for landscape management and maintaining it. Such companies are unregulated and many have had to be removed from sites. There are significant concerns about how such a company could responsibly discharge functions associated with protecting and promoting the environment and biodiversity.

The post and wire fence not only covers the manmade Buffer Zone but also other sections of the surrounding border zone. Punching holes in the fence for Hedgehogs to pass but no further comment is provided as to how other land based wild life would fare. The Buffer zone is planned to enclose the post and wire fence.

The Planners are ultimately responsible for delivering on the Council's Green Objectives.

1370

REBUTTAL STATEMENT PAGE: 18

2.110 The proposal complies with the requirements of Policy HOU10. 20% of the development (3 units) are being provided for social housing. The applicant will enter into a Section 76 Agreement with the Council as the legal mechanism to secure the delivery of these units for social housing.

POLICY HOU 8

Protecting local character, Environmental Quality, and residential amenity in Established Residential Areas.

1380 2.101 Policy HOU 8 states that planning permission will be granted for the redevelopment of existing buildings, or the infilling of vacant sites (including garden areas) to accommodate new housing, where the criteria set out in Policies HOU 3 and HOU 4 (with the exception of Policy HOU 4 (d) – Density Bands, and all the additional criteria set out below are met.

We have demonstrated that Policies HOU3 and HOU4 (with the exception of HOU4(d) have not been met and neither does HOU(8b) meet the criteria required.

2.105 The new proposal follows the pattern of local development character very closely.

This statement does not meet with HOU 8 (b) nor with the Justification and amplification below.

It is NOT in keeping with the local character, threatens our local Biodiversity and provides NO residential amenity for the existing settlements.

2.107 The proposed development complies with criteria a) – c) and protects the Local Character, Environmental Quality, Residential Amenity of the established areas within Drumbeg.

1390 "HOU 8b) the pattern of development is in keeping with the local character, environmental quality and existing amenity of the established residential areas."

Justification and amplification

“In established residential areas planning will only be granted for infill to accommodate new housing where the pattern of development is in keeping with the overall character in the established residential areas. “

Clearly, we have pointed out that the design, style, size and height of the proposed buildings are not appropriate in our area of settled residential housing.

Therefore, Policy HOU 8 does NOT meet the criteria for this application.

Therefore, according to A Quality Place section of the LCCC LDP 2032 document HOU 1,2,3,4,5,6,8 ,This development does not meet the criteria.

1400

NH2 SPECIES PROTECTED BY LAW

REBUTTAL STATEMENT PAGE: 21

2.114 Development proposals are required to be sensitive to all protected species, and sited and designed to protect them, their habitats and prevent deterioration and destruction of their breeding sites or resting places. Seasonal factors will also be taken into account.

The Rebuttal Report claims that a full assessment of the ecological features and environmental constraints has been carried out by suitably qualified ecologists. The survey work undertaken according to the Rebuttal Report has identified that the site and any existing vegetation, in its current form, holds negligible value in terms of biodiversity and the development will not harm any matters of ecological or environmental interest. This last sentence is more declarative than the Ecology Report.

1410

The AECOM Ecological Appraisal Report dated October 2023 was commissioned by the developer.

That Report, pays insufficient regard to the planned removal of the central hedgerow in particular which is some 165 + years old, the destruction of the scrub and tussocky grasslands with the resultant negative impact on the environment. In addition as the large carbon sink so important in offsetting greenhouse gases by taking carbon out of the atmosphere and storing it in the central hedgerow and plants will all be removed all of which is against the principle of LDP2032.

1420

The extensive disclaimer in the AECOM Report and the absence of verification activity or actions found within, makes its independence, open to question.

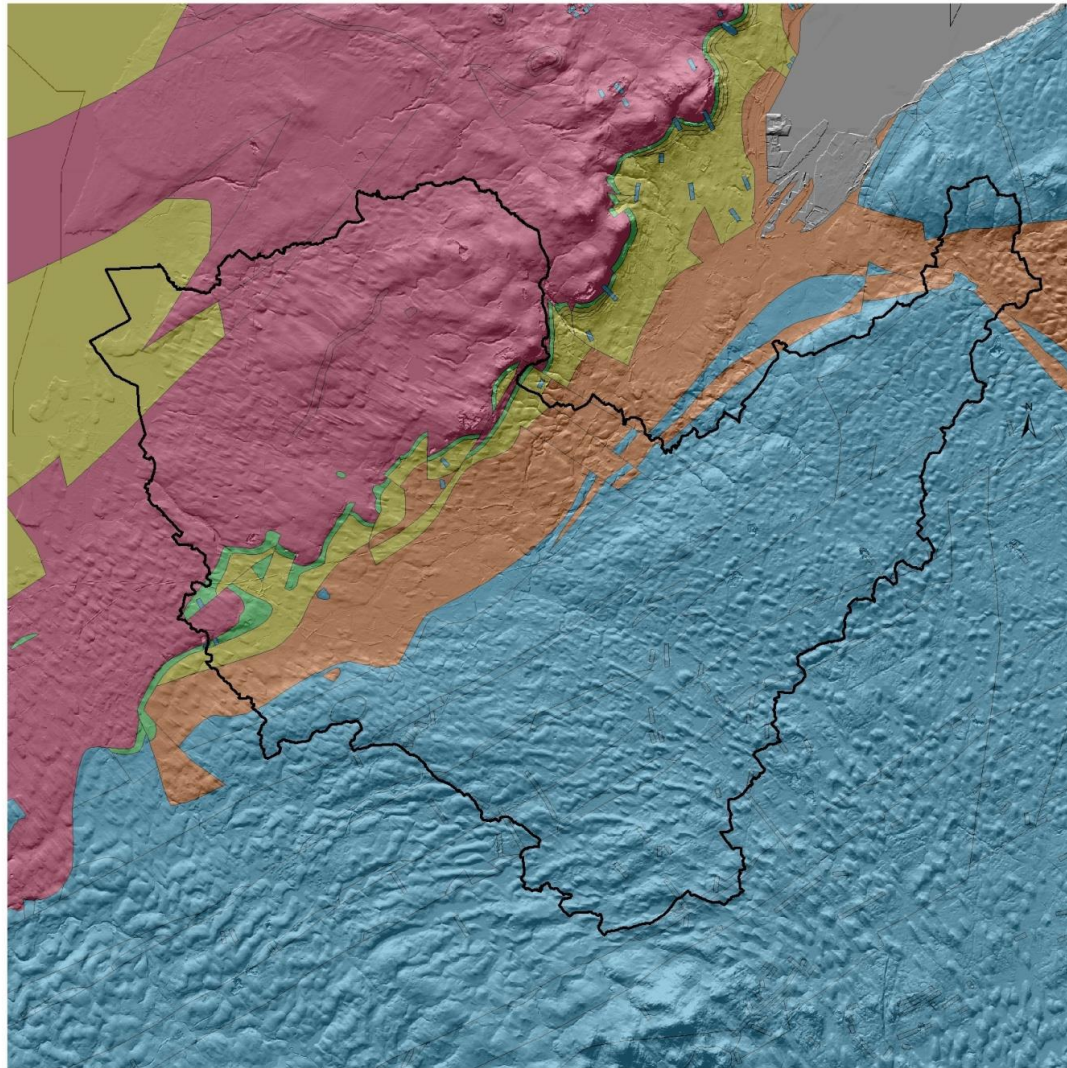
Their assertion “that they ASSUME all evidence given is correct. “ is open to doubt as their evidence is supplied by the developer or his agents.

The Ecological Appraisal Report was constructed from 2 visits in September 2023. The length of time spent on the site at the 2 visits is not recorded except at dusk when recording Bats for 2 hours otherwise no arrival or departure times are noted during daytime. Also they took in a very limited

area regarding its scope. Given the location of the site in the Lagan Valley Regional Park and proximate to the River Lagan and the Sherwood Aquifer which in places is less than 10m from the surface - the investigation appears very restrictive. No seasonal variation was recorded which is essential in recording wildlife on the site.

1430

[SEE Q APPENDIX 6: The Aquifer](#)



Geological Survey of Northern Ireland

	Lisburn_and_Castreagh
aquifer_class	
	Bh(f)
	Bh(f-k)
	Bh(l-f)
	Bl(f)
	Bm(f)
	Bp(f)



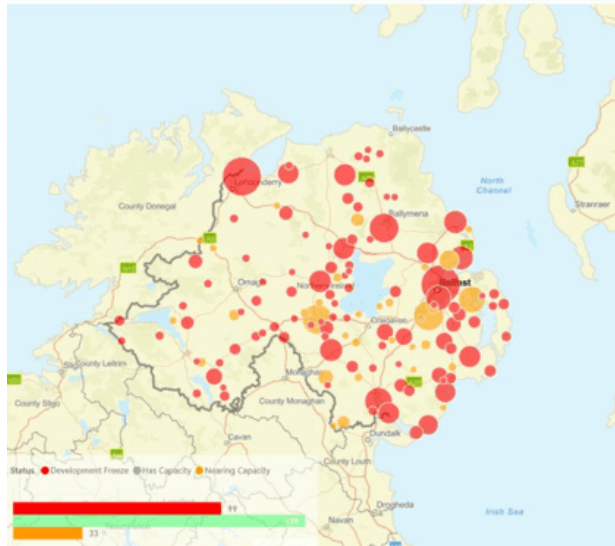
Figure 1 - Aquifer Classification across the Lisburn and Castreagh Council Area

This map contains material that is based upon Crown Copyright and is reproduced with the permission of Land and Property Services under Delegated Authority from the Controller of Her Majesty's Stationary Office, © Crown Copyright and database right 2012. Permit number DMOU205.

[See Q Appendix 6: The Aquifer](#)

Given our growing awareness of our sewerage system 'over capacity' this surely should be a major consideration.

Wastewater Capacity Constraints



271 larger WWTW and their catchment areas serve c.90% of NI's population

99 are now either at full capacity or fast approaching full capacity or have environmental / operational issues

A further 33 will reach full capacity by 2027

Economic growth, our natural environment and the population's health are at risk

THE BIODIVERSITY

1440

As residents we know that protected species such as bats and barn owls have habitats proximate to the site. Barn owls have a foraging distance equivalent to 7,102 football pitches and the core foraging areas for bats is up to 4km from daily roosts and occasionally up to 6 km (Smith, P.G. 2000).

[SEE Q APPENDIX 2 Barn Owls](#)

Bats also use woodland edges, hedgerows, rivers and other linear features like tree lined footpaths as corridors to commute from one area to another. These navigational landmarks also provide protection from predators. As bats fly through the night their echolocation calls bounce off these landscape features, helping the bats find their way to and from their roost to foraging sites.

[SEE Q APPENDIX 8: BATS](#)

1450

The limited area selected by the Ecologists therefore needs to be taken into account to give a more realistic sense of how the proposed site fits within the LVRP and the habitats, foraging and commuting corridors it provides and the true harm associated with their removal. Their assessment requires at least 1 year in order to record the seasonal variability.(Ref)

The AECOM Report is silent on the mycelium network underground and its importance to biodiversity within the site. The mitigation proposals in the AECOM Report acknowledge that grassland (over 1 Ha) which is habitat and foraging will be removed. It further acknowledges that during the construction stage harm may occur to retained hedgerows. Undoubtedly this will happen

from dust and heavy machinery in addition to the destruction of the heritage hedge and the 1.1 Ha of scrubland which like the hawthorn hedge is to be protected .

1460 The proposed habitat loss required to facilitate development involves the removal of a large section (ca.100m) of hedgerow and over 1 Ha of grassland scrub vegetation. Hedgerows are a NI priority habitat and a key consideration on the **PPS 2 (NH5) NI Planning Policy**. 'Biodiversity hedgerow loss to facilitate development can only be considered if the proposed mitigation measures are likely to result in a net gain to Biodiversity.' There is **no** evidence to credibly support any biodiversity gains within the Ecological Appraisal Report.

Aecom have not factored into their report the Time Factor taken for any Biodiversity to recover using their man made buffer Zone/strip. It is likely to take many years. In the interim with Climate change there is nothing on that site to replace the loss of the present carbon sink particularly with the Wetlands /Bogland on site presently one of the greatest removers of Carbon and its storage. They have however admitted to plants on the site that thrive in wet conditions all year round. These are likely to be the reeds found all year round on the site.

1470 **SEE Q APPENDIX 5: AECOM REPORT AND NIEA LETTER DISCREPANCIES: CRITICAL OBSERVATIONS**

SLNCI and Woodland

From orthophotography there are 6 Sites of Local Nature Conservation Importance (SLNCI) and two parcels of Long-Established Woodland within 1km of the proposed site, which contains boundary hedgerows which are Northern Ireland Priority Habitat (NIPH), for protected species, badgers, hedgehogs, and nesting birds etc. The importance of the proposed site as a commuting corridor is set out in the LVRP correspondence of 30 March 2022, already referred to above.

1480 *NH2 Species Protected by Law 2.113 Planning permission will only be granted for a development proposal that is not likely to harm a European protected species.*

Assessment against policy

2.115 The proposal complies with this policy test. The application site has been surveyed on a number of occasions – most recently in September by suitably qualified ecologists in order to establish whether any ecological features, protected species or protected habitats are likely to be impacted by the development proposals.

1490 *2.116 The updated Ecological Appraisal currently being assessed by Natural Environment Division has considered all available and up-to-date species records in assessing the ecological and biodiversity of the site and arriving at the conclusion that the development will not cause any significant harm to any protected species. This is consistent with the conclusions of the Preliminary Ecological Appraisal, which were accepted by Natural Environment Division and the Planning Authority, having considered the information and NED response, indicated in the Planning Committee Report prepared for the September 2023*

meeting that they are content that the development would not result in a significant detrimental impact on matters of ecology. It is also notable that Natural Environment Division most recently responded on 12th June 2023 raising no objections. The Ecological Appraisal Report includes a series of proposed mitigation measures to minimise the potential for impacts on relevant ecological receptors that can be enforced by way of planning conditions.

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CRITICAL ISSUES:

1. The AECOM Environmental Planning Application (LA05/2022/0033/F) dated November 2021, received on 16/01/2022, inadequately addresses nocturnal species such as bats, badgers, hedgehogs, and priority butterflies. This Desk-Based response is unreliable, as critical decisions are based on inaccurate information, particularly regarding nocturnal species that should be assessed over an extended period at night.
- 1510 2. In a letter dated 22nd February 2022, NIEA/DAERA highlighted the Planning Authority's responsibility to consider environmental risks and comply with legislation. Reference to PPS 2015, 5.14 pg 25, and Position Paper 8 Natural Heritage 2019 pg 27 emphasizes the importance of comprehensive assessments in the Lagan Valley Regional Park (LVRP) and Area of Outstanding Natural Beauty (AONB).
3. Despite concerns raised in a letter from the Quarterlands Group to NIEA/DAERA in October 2022, the response disregarded crucial biodiversity issues, including those outlined in SPPS 2 Natural Heritage (now NH Natural Heritage). Eyewitness reports from a local resident ecologist were overlooked and other eyewitness reports to Cedar were ignored.
- 1520 4. The Rebuttal Report fails to acknowledge a letter from NIEA/DAERA dated 6th January 2023, expressing concerns about potential harm to NI Priority Habitats and protected species. The sudden change in stance in a letter dated 12th June 2023, without supporting evidence, raises doubts about the credibility of the assessment.
5. The absence of effective mitigation measures places various species, including hedgehogs, bats, birds, and owls, at risk. Legal protection for species under Wildlife Order 1985 and priority habitats demands thorough consideration during the decision-making process.

1530

6. European protected species, subject to strict protection, and national protected species listed under the Wildlife Order require meticulous evaluation. The absence of a Biodiversity checklist for the proposed development site is a glaring oversight.

7. The Planning Department has been provided with a list of priority protected species, supported by evidence, including barn owls with significant foraging areas. The September 2023 survey overlooked barn owls, and refusal to build remains the only viable option to prevent harm to protected species.

1540

8. The proposed development site falls within Sites of Nature Conservation Importance and Wildlife Refuges under the Wildlife (Northern Ireland) Order 1985. Adverse impacts on priority habitats, species, and landscape features of natural heritage importance necessitate reconsideration.

9. The development's impact on Areas of Outstanding Natural Beauty, failure to respect existing settlements, and disregard for local landscape, heritage, and wildlife raise serious concerns. Residents' eyewitness testimony, particularly regarding red-listed birds and animals, should be a pivotal consideration.

1550

In light of these compelling issues, we strongly urge a thorough reassessment of Planning Application LA05/2022/0033/F, taking into account the ecological significance, legal obligations, and potential harm to protected species and habitats.

See also our website www.quarterlands.com

SHARED SURFACE ARRANGEMENTS

REBUTTAL STATEMENT PAGE: 22

1560

2.127 The site is proposed to be accessed from Quarterlands Road with the access and internal carriageway designed to adoptable standards. The internal carriageway then transitions into a shared surface arrangement which is considered appropriate for this low-density cul-de-sac. Dwellings 3, 4 and 5 are proposed to be served by a private driveway. The development is accessible to all and that the necessary provisions are made for those with of mobility impairments. The siting and nature of landscaping has been carefully considered to

ensure there is no obstructions which might hinder movement throughout the site or impact visibility across the site in the interests of health and safety and road safety.

The Rebuttal Report discusses necessary provisions for those with mobility impairments and the siting and nature of the landscaping ensuring no obstructions that will hinder movement with the interest of health and road safety. It provides no details to support its claims.

1570 Known hazards are contained within the proposal design. Without kerbs, as Lord Holmes' Report states, there are significant hazards for those with sight problems: 'Lack of kerbing is a common element of shared designed known as level surface. This causes problems in terms of losing the sense of 'safe' space' (Page 13).

The Rebuttal Report is silent on the risk to pedestrians with visual impairments or well-known hazards from shared surfaces.;

SEE APPENDIX 1 : SHARED SURFACE ARRANGEMENTS

REBUTTAL CONSIDERATION OF OBJECTIONS

REBUTTAL STATEMENT PAGE: 29

1580 LAP 2001 , DBMAP, BMAP, and the historic application 2006 are no longer applicable to LAO5/2022/0033/F. The only plans for material consideration are LDP2032 adopted in September 2023 and the SPPS.

REBUTTAL STATEMENT PAGE: 29

Developers suggest local community attempting to acquire the land for community use.

Quarterlands Group have absolutely not. THERE IS A CLIMATE EMERGENCY. These historic lands are important, unploughed for at least 20 years.

The Lands have been within the settlement limit for Drumbeg for centuries The lands have been protected and part of the Green Belt since the LVRP was created in 1967.

1590 REBUTTAL STATEMENT PAGE: 30

No transitional arrangements. White lands mentioned.

REBUTTAL STATEMENT PAGE: 32

Developer says - White lands available in principle for development. NO SUCH PRINCIPLE EXISTS.
The site was NOT zoned for. any specific land usage(A Beggs 2023)

REBUTTAL STATEMENT PAGE: 33

1600 The APPLICATION S/2006/0690/F IS NO LONGER APPLICABLE, but it is interesting that the developers talk of 15 large, detached dwellings approved in 2008. The approval was actually for 12 semi-detached houses of which 8 two storey, 4 chalet type and 3 detached two storey houses. How that could reach 15 large, detached dwellings is unbelievable but no longer valid. Bottom of the page states the evidential context presented demonstrates that the site is a quasi-housing zoning. Quasi means resembling which I presume they are trying to indicate that it resembles the planning approval in 2008. The original planning approval is no longer applicable. HOU 4

REBUTTAL STATEMENT PAGE: 35.

1610 Again refers to the approval in 2008 with 15 large dwellings but this current proposal is more aligned to current market demand and which helps to meet current needs for affordable housing. The current demand is for 1 and 2 Bed Houses. These 5 bed houses are not affordable for the average workers

REBUTTAL STATEMENT PAGE: 37,38.

1620 The internal carriageway then transitions into a shared surface arrangement for which we have many answers. [See Q appendix 1](#) It then goes on to talk about necessary provisions for those with mobility impairments and the siting and nature of the landscaping ensuring no obstructions that will hinder movement with the interest of health and road safety. They then go on to talk about PCP's on the Quarterlands Road and then back to the site has a gentle level change-There is a 2 meter rise (LCCC Case Officer Appendix 1.5) and not a 1 meter rise. They also comment on level access at least one entrance to each dwelling. The social housing is described as 3 dwellings designed to ensure that they are not distinguishable in terms of design. The difference in shapes of all three houses compared with the 5 bed houses can be seen along with their facades

REBUTTAL STATEMENT PAGE: 40

The proposal also incorporates dwellings which have been identified for occupation as social housing. The three dwellings are designed to ensure they are not distinguishable in terms of design. The mixed tenure of the development will promote a balanced community.

1630 The reference to social housing within the Rebuttal Report describes 3 dwellings designed to ensure that they are indistinguishable in terms of design from the other 14 houses. Again the lack of transparency within the Rebuttal Report is a concern. Obviously, two semi-detached houses and one smaller detached house will stand out as different to the 5 bedroom detached houses which comprise the core of the proposed development;

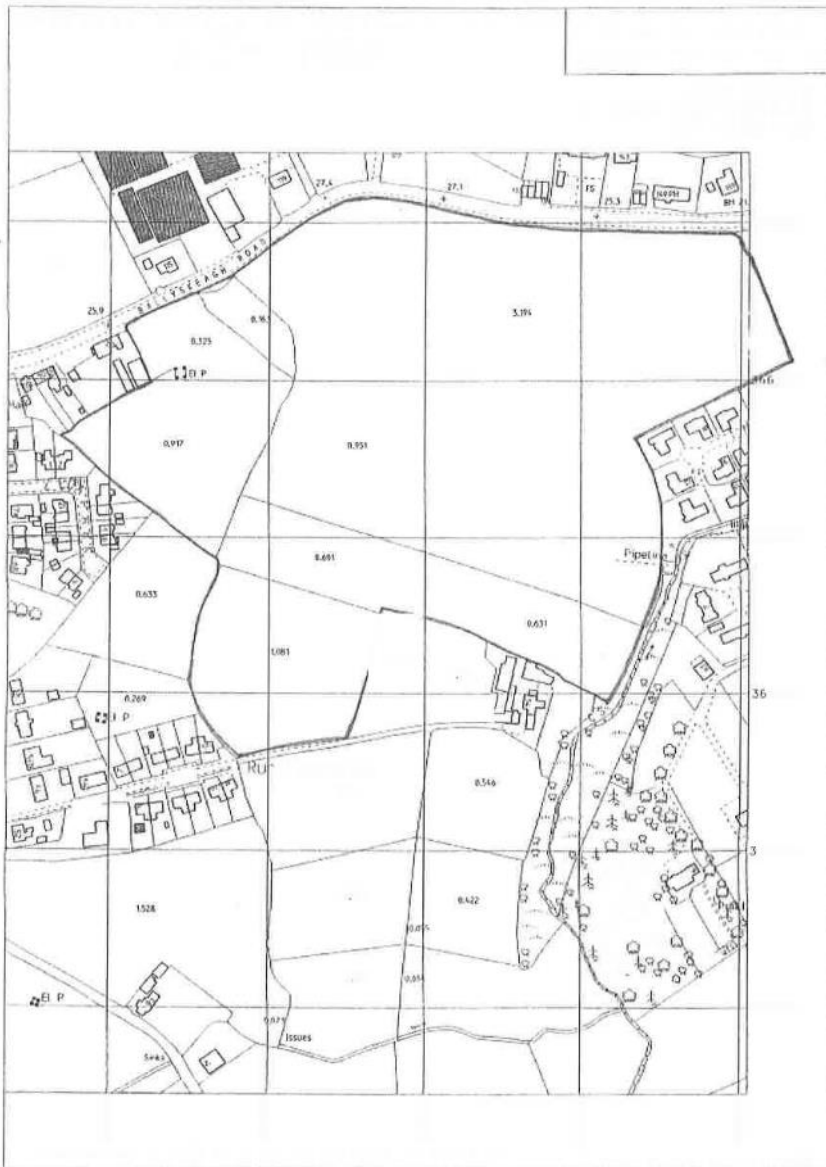
The Developer claims that the Proposed Development sits on the last available site within the village area. THIS IS INCORRECT AND MISLEADING

WE HAVE SEEN THE FUTURE

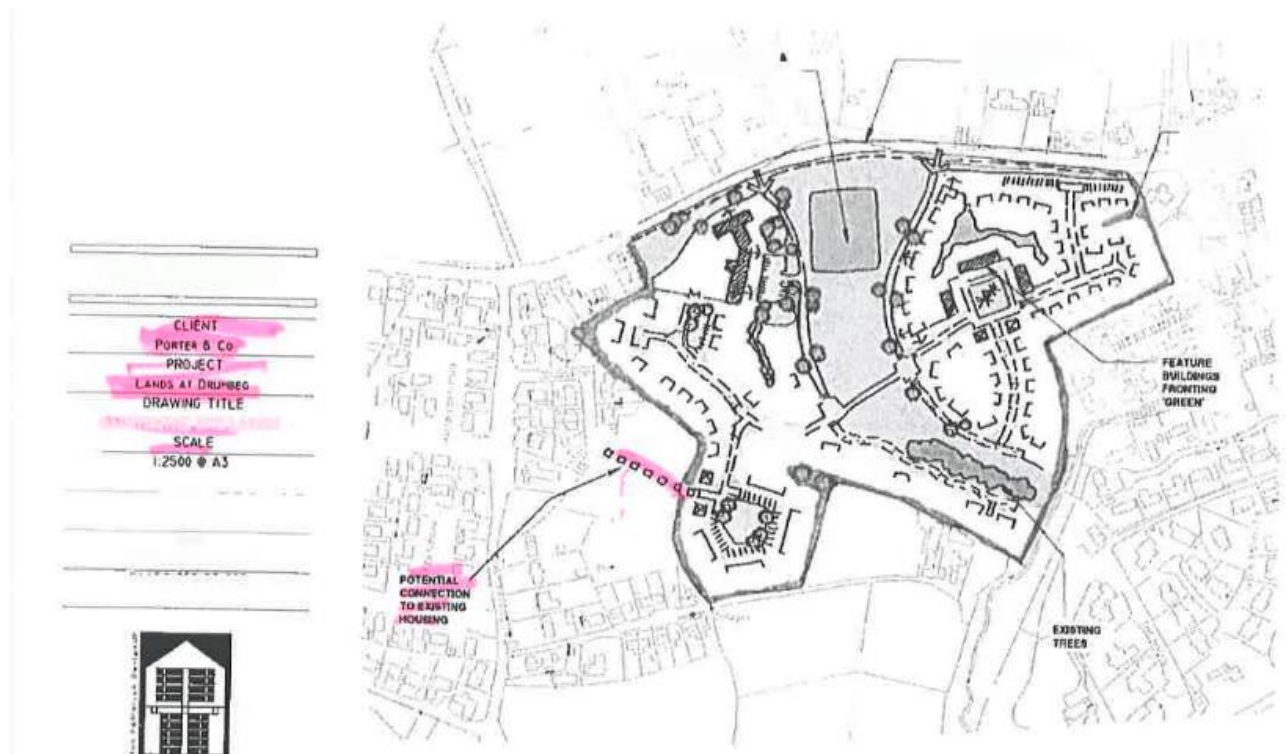
In our exploration of this issues around this development we uncovered - Local Development Plan 2032 Draft Plan Strategy Representation Report 2020

DPS 023 Drumbeg West site (Quarterlands Road), MPS-023 Drumbeg West, Lands North of 46 Quarterlands Road Drumbeg. Matrix Planning on behalf of individual for approx. 40 units housing.

1640



DPS 035 on behalf of Porter Homes MPS-035B Drumbeg (Joining both nodes) “Retirement Village” by Inaltus Ltd.(see above). From the maps provided the applicant has outlined a “Potential connection to existing housing in Zenda Park” . That area now would potentially connect to the Way Leave on this present application.



1650 DPS 035 on behalf of Porter Homes MPS-035C(Ballyskeagh) by Inaltus Ltd.

The above 3 Representations by 2 groups to the Draft Plan Strategy were made in 2020 and would likely be known to the Developer and to the Planners discussing this present Quarterlands site. In addition, to these 3 sites in Drumbeg and in Ballyskeagh.

These are only the development plans we have found out about. The THREAT OF DESTRUCTION to the Lagan Valley Regional Park is obvious.

Since 2020 at least 4 New Houses have been built in the area and others are planned.



LA05/2022/0033/F
Proposed development showing the relative heights of surrounding buildings.

<p>Key:</p> <ul style="list-style-type: none"> ● 19 - Single Storey homes ● 15 - 1.5 Storey homes ● 5 - 2 Storey ● 17 - Proposed 2.5 Storey ● 1 - Existing 2.5 Storey 	<p>➔ Please also note that the land slopes upwards from here, by about two metres across the site, not downwards.</p>
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1660

REBUTTAL STATEMENT PAGE: 43.

They state as an **INFILL SITE**, the proposed scheme will not project beyond the eastern edge of the settlement limit defined by Zenda Park and Rural Cottages and Drumbeg Cottages further north. This is a decision by the developer nothing else. (See our previous comments on infill) Infill usually means gap. These are 2 agricultural fields open at the North and east sites

[Q Appendix 3: Planning History of Drumbeg West](#)

I refer to the history of Drumbeg West. The developments were to be bungalows and developers followed that rule to avoid overlooking, overshadowing, loss of light etc HOU 4. We have over 400 + objectors letters and 1,500+ signatures on the website petition while the Developers try to justify their application in the face of objections and SPPS, HOU, NH, COU TRA 8 accepted principles.

1670

REBUTTAL STATEMENT PAGE: 44.

29 The proposed development sits on the last available site within the village area and adds 17 houses to the existing 183 homes, an increase of less than 10% to the overall numbers of houses. The site itself forms an infill between Zenda Park to the north, Rural Cottages to the south and existing dwellings along Quarterlands Road to the west.

1680 Claims that the proposed development sits on the last available site within the village area and adds 17 houses to the existing 183 homes and that the site forms an infill between Zenda Park to the north, Rural Cottages to the south and existing dwellings along Quarterlands road to the west. This is not the only available site in Drumbeg as explained above .Infill site we have already addressed These statements are made by the developer and have no status in respect of a planning decision;

REBUTTAL STATEMENT PAGE: 46

30 The development of a small number of additional dwellings will not alter the character of the village of Drumbeg nor will it have any detrimental impact on the tranquillity and/or distinctiveness of the AONB.

1690 This ignores that the site is within the Lagan Valley Regional Park and an AONB .LVRP responded in the consultation on 30 May 2022 objecting to the proposed development states: ‘The proposal will intensify urbanisation of the river corridor and will significantly eat away at this valuable green corridor. This green corridor provides the only refuge for wildlife in an urban area and the river corridor forms vital access for the adjacent communities for both recreational and mental health benefits. It is important that this resource is protected for future generations and for the well-being of the City of Lisburn. We therefore object to this development.’

It also ignores the harm caused to the people who bought their homes adjoining a natural habitat for the tranquillity and mental health, sometimes physical health who are facing its utter destruction.

1700 The removal of more than 100 metres of ancient hedgerows (dating back some 165+ years) and the underlying mycelium with the diverse habitat scrubland, foraging and commuting corridors for animals, birds and insects many of which are protected is ignored in the Rebuttal Report. It is recommended that the priority protected Hawthorn central Hedgerow be retained which will ensure its carbon sink function can continue.

The destruction of tussocky grassland which has been unploughed for at least 20 years and the catastrophic loss of the mycelium network and biodiversity underground which gives so much to the wildlife and inhabitants of this area contradicts NIEA’s recognition of its high ecological value.

From the Developers rendered graphic the 1 storey core is seen with the 1.5 Storey houses in Zenda Park. The total for the surrounding houses of the site are shown in our key to the graphic.



LA05/2022/0033/F
Proposed development showing the relative heights of surrounding buildings.

- Key:
- 19 - Single Storey homes
 - 15 - 1.5 Storey homes
 - 5 - 2 Storey
 - 17 - Proposed 2.5 Storey
 - 1 - Existing 2.5 Storey

➡ Please also note that the land slopes upwards from here, by about two metres across the site, not downwards.
This render is created by the developer and is not quite accurate.

The developers graphic below from 211123 Design and Access Statement **SADLY MISSES OUT** the single storey buildings adjoining the proposed site – see the red dots on the graphic above



- KEY
- 2-Storey
 - 1.5- Storey
 - Single storey core

West Drumbeg Village Plan
House Heights NTS
For Carvill Developments
AR URBANISM | OCTOBER 2023



WIDER VIEW SIZES OF HOUSES IN OUR VILLAGE

	2 storey	1.5	1 .0	total
Hambleden Park		1	49	50
Zenda Park		14		14
Ballyskeagh Road	12		1	13
Sandyhill	5	13	44	62
Townhouses	6 + 4 apts	3		13
Quarterlands Road	10	6	8	24
Quarterlands Lane	6			6
Rural Cottages	2	1	12	15

1720

REBUTTAL STATEMENT PAGE: 47.

1730

They state the following the description of Drumbeg as a vibrant village is at odds with other assertions that the village lacks services, jobs and amenity facilities to serve the existing residential population. Drumbeg would appear to function as a commuter village to the larger centres of Belfast and Lisburn. On this basis we consider that Drumbeg already functions to some extent as a dormitory settlement. Building 17 homes to the village will have little or no measurable impact on the status of the village being dormitory ,vibrant or otherwise.

1740

The building of 17 Homes on a 1.1 Ha site in what is a Hamlet/village will undoubtedly change the character of the village .Fourteen of the 17 homes will be 5 bed with tall ground to Ridge levels and will tower over the surrounding 1 and 1.5 storey houses on entering from the Ballyskeagh Road end or Hillhall Road ends despite the claimed reduction of 500mm in ridge height. From the increased size of the footprint caused by the permanent addition of the 1 storey extension ,14 of these houses can only be afforded by the rich people(5 bed) in order to buy but also to maintain. With the potential number of cars /vans from 69 (including garages) parking spaces leaving and entering daily in this cul de sac site the status of this village will clearly change.

Next paragraph ends with the site does not act as or form part of any strategic buffer between Belfast and Lisburn. Regarding comments on the LVRP and AONB they state there are no local or

regional policies which preclude in principle the development of housing within an AONB. The site is also located within the settlement limit of Drumbeg village and designated for housing in dBMAP. dBMAP is no longer relevant.

The area of Drumbeg is referred to as the lungs of Belfast and Lisburn lying between Belfast and Lisburn. There is nothing to indicate a Principle that you build in the Park which carries AONB status. Other AONB's i.e. Mourne Mountains and Giants Causeway would have the same respect for preventing 17 houses being built in those areas.

1750 The lands in this Application do not have a specific land use zoning allocated (A Beggs 2023)

In addition the biodiversity and green spaces serve well the population of both areas, which account for more than half of the population of Northern Ireland;

(ii) one of the objectives of the LDP 2032 is to reduce dependency on cars through development where there is transport infrastructure which is missing in the area;

(iii) the LDP 2032 seeks to protect and enhance green spaces and the natural environment;

(iv) the LDP 2032 seeks to link housing with employment rather than to create more commuter routes;

1.8 MILLION VISITORS

1760 Lagan Valley Regional Park runs from Belfast to Lisburn. It is Northern Ireland's only regional park and is a dedicated area of natural beauty. It is the most visited outdoor attraction with more than 1.8 million visitors last year. 8 Nov 2023

Drumbeg is proud to be at the centre of The Lagan Valley Regional Park despite the currently diminished services and facilities.

REBUTTAL STATEMENT PAGE: 48.

1770 The developer refers to mixed housing, height of the properties and density and the proposed number of units and scale of development are proposed to be in keeping with the local character of the village of Drumbeg. Proposal will marginally increase the resident population of Drumbeg. It will not result in any adverse impacts on the roads and drainage. They then go on to refer to the Sandy Hill and Ballyskeagh Road areas. They emphasise that there is no requirement for the applicant to carry out a housing need assessment. Proposed scheme is complimentary to the established built context and character of the area of the village. The proposed mix of dwellings is informed by the current housing market trends and residential preferences and helps meet current need for affordable housing in accordance with the plan strategy.

There is no housing need in Drumbeg; there is NO WAITING LIST FOR HOUSES. The demand for Houses in the LCCC area generally is for 1 and 2 beds. The majority of the proposed houses are

1780 unaffordable to the average working person. The application does not fit in with the surrounding houses. We are presently witnessing more flooding in our area

REBUTTAL STATEMENT PAGE: 51.

1790 *the shared surface arrangement is considered to be appropriate for this low density cul-de-sac. The scheme seeks to promote a low speed vehicular environment by using a combination of road alignment, minimal level changes, material treatment of the carriageway, and quality planting to emphasise the domestic context and naturally traffic calm the development. The use of a shared surface arrangement also creates the opportunity for enhanced planting and the promotion of a quality residential environment. The use of shared surface arrangement within social housing development are those containing social housing units is common place across Northern Ireland and is acceptable for social housing providers subject to ensuring the design is in accordance with the prevailing DFL road design and technical standards which DFL roads has confirmed this proposal is.*

We have serious concerns about shared surface arrangements in the light of the Holmes Audit report on all UK areas. He points out these cause accidents by design.

SEE APPENDIX 1 : SHARED SURFACE ARRANGEMENTS

REBUTTAL STATEMENT PAGE: 52.

1800 The term affordable housing in the context of the Plan strategy refers to social rented housing and intermediary housing for sale or rent. This definition was formulated by the Department for Communities.

The shared surface arrangement is the main carriageway in to and out of this site which will contain walkers, cyclists, people with mobility problems and wheelchair users and mobility scooters to name just a few. These persons will be exposed to all types of motorised transport so it is easy to comprehend why accidents are frequent as referred to in the Holmes report

SEE APPENDIX 1 : SHARED SURFACE ARRANGEMENTS

AFFORDABLE HOUSING

REBUTTAL STATEMENT PAGE: 51

1810 *45 The proposed mix of dwellings is informed by the current housing market trends and residential preferences and helps meet current need for affordable housing in accordance with the Plan Strategy.*

To refer to these homes as affordable homes as the Rebuttal Report does stretch the definition of 'affordable' which at April 2021 was: 'Affordable housing is a) Social rented housing; or, b) Intermediate housing for sale or, c) Intermediate housing for rent. Affordable housing is housing

1820

which 'is Deemed affordable to those with a household income at or below the median as rated by the national or a local government by a recognised housing affordability index.' The median income in Northern Ireland at October 2022 was £30,000. As most lenders cap the amount one can borrow to five times one's annual salary and require a deposit of 5% of the cost of a house this would mean these 5 bedroom detached houses could never be within the reach of anyone on the median income. Again the accuracy of claims made within the Rebuttal Report is of concern.

REBUTTAL STATEMENT PAGE: 53

1830

53 The shared surface arrangement is considered to be appropriate for this low-density cul-de-sac. The scheme seeks to promote a low-speed vehicular environment by using a combination of road alignment, minimal level changes, material treatment of the carriageway, and quality planting to emphasise the domestic context and naturally traffic calm the development. The use of a shared surface arrangement also creates the opportunity for enhanced planting and the promotion of a quality residential environment. The use of shared surface arrangement within social housing development or those containing social housing units is commonplace across NI and is acceptable for social housing.

1840

Claims that the shared surface arrangement is considered to be appropriate for this low-density cul-de-sac. As already noted above the Holmes Report raises concerns about shared surface arrangements particularly for those with a disability. How without footpaths and kerbs will the proposed development ensure the safety of wheelchair users, those with mobility or visual disabilities, mobility scooters users, those walking with prams or buggies, or children playing within the proposed development with the added concern of running out onto the Quarterlands Road, to name just a few examples? There are real, recognised and predictable hazards posed by the proposed road layout and the use of shared surfaces which makes approving the application a safety risk to children and adults, particularly those with a disability; which developers and planners should already know.

SEE APPENDIX 1 : SHARED SURFACE ARRANGEMENTS

REBUTTAL STATEMENT PAGE: 54-60.

Contain the PEA and the recent Aecom Report which tells us what their view is on biodiversity which has not changed. It is now the site has been surveyed by a qualified ecologist and hedgehogs are not currently "highly protected" in the North of Ireland and EIA determination is not required. It then goes on to talk about suitably qualified ecologists

- 1850
- 'It is recommended that residents EYE-WITNESS Testimony should be considered when determining the likelihood of Particular Priority Protected species being present on site or in the surroundings' [see Q Appendix](#): Eyewitness statements.
 - Please refer to the list of Priority Protected Species including Red-Listed birds and animals present on the site and in the surrounding area.

SEE Q APPENDIX 5: AECOM REPORT AND NIEA LETTER DISCREPANCIES:

REBUTTAL STATEMENT PAGE: 61

1860 They summarise that a full assessment of the ecological features and environmental constraints has been carried out by suitably qualified ecologists. The survey work undertaken has identified that the site and any existing vegetation, in its current form, holds negligible value in terms of biodiversity and the development will not harm any matters of ecological or environmental interest.

See our comments in a separate Document entitled " Ecological appraisal Report response to Aecom" rebutting these claims .

A letter from NIEA dated 6th January 2023 contradicts the AECOM report.

NED: note that the extant vegetation onsite is of HIGH ecological value.

The same letter from NIEA 6th January 2023 (which was not mentioned in the rebuttal)

Quote "The development has the potential to harm NI priority Habitats and related NI priority / protected species and further ecological information is required."

1870

REBUTTAL STATEMENT PAGE: 62

68 Contrary to the information outlined, Hedgehogs are not currently 'highly protected' in Northern Ireland, although they are a Northern Ireland Priority Species.

A N. Ireland Priority species requires protection.

Rebuttal Report refers to fencing and hedgehog holes and also the creation of noise and dust which will require the contractor to employ responsible working practices.

It is apparent that such harm is inevitable and will add to the harm caused to the environment should planning permission be granted;

1880 **SEE Q APPENDIX 5: AECOM REPORT AND NIEA LETTER DISCREPANCIES:**

REBUTTAL STATEMENT PAGE: 63.

The application site represents the extent of the applicant's land interest in this area and there are no proposals being brought forward for the lands adjacent to the application site. This is clearly incorrect as they are described and the drawings are included above on pages 51 and 52.

1890

Under hedgerow removal they talk about hedgerow along the mutual boundary of the site with neighbouring properties and open countryside is proposed to be retained. They also state that the applicant does however benefit from the right to trim the hedge for the purposes of general maintenance. With the buffer zone sealed by fencing it would be difficult to have access. Central Hedge removal is not mentioned or the valuable scrub vegetation.

REBUTTAL STATEMENT PAGE: 64.

Talks about fencing and the hedgehog holes and also the creation of noise and dust. Therefore the developer will require the contractor to employ responsible working practices. This is to ensure that the impact of the construction process on the amenity of neighbouring properties is minimised. Includes controlling hours of work and on site mitigation measures to control dust. No mention is made of the contractors' vehicles parking during the construction process and the frequent movements in and out of the site.

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REBUTTAL STATEMENT PAGE: 65.

72 The land indicated to be grassed is a wayleave for the future maintenance and upkeep of the drainage infrastructure in accordance with the requirements of DfI Rivers and NI Water. The application site represents the extent of the applicant's land interest in this area and there are no proposals being brought forward for the lands adjacent to the application site.

1910

The Rebuttal Report states that the application site represents the extent of the applicant's land interest in this area and there are no proposals being brought forward for the lands adjacent to the application site. This may, or may not, be the applicant's intention at this time but understandably residents and others are concerned about salami sliced developments in the area with the 2 previous proposals for the immediate area which we have documented in earlier sections pages 51 and 52..

The development plans clearly show the creation of a 6m Wayleave into the fields behind the proposed site. It is difficult to understand why such a potential is created as the Rebuttal Report now claims the developer's interest is limited to that site only.

Talks about landscape management and maintenance plan. Management companies are totally unregulated and unlikely to be responsible for planting or maintaining plants.

1920

REBUTTAL STATEMENT PAGE: 66.

Indicates a negligible increase in traffic levels as quantified in the submitted TAF and as such it is not their consideration that the proposal would result in an unacceptable adverse impact on the local road network any way change the character of the environment. And critically DFL roads have raised no objection. Could it be that Dfl Roads have not seen the recent Plans including no footways and the positions of 14 On Street Car/**van** Parking areas sited on the Internal Carriageway with accompanying 44 in curtilage and 11 garages all for parking car/vans.

The bus service remains poor on the nearest main road. i.e. Ballyskeagh. Recent traffic survey has noted the doubling of cars using the Ballyskeagh Road over the last 5 years.

1930

REBUTTAL STATEMENT PAGE: 67.

They refer to TRICS database along with transport assessment form "TAF". They conclude that there would be only minimal changes in traffic flows when comparing 85th percentile or average peak hour flows. With 69 potential vehicles from the Residents leaving and entering this cul de sac development daily the metrics would indicate congestion at peak times as the entrance and exits are unto the Quarterlands Country road. The increased traffic from this car driven development will also give rise to congestion on Quarterlands Road

ROADS AND TRAFFIC

1940

REBUTTAL STATEMENT PAGE: 68.

Talks about access arrangements stating that the lands required for the delivery of the site access and visibility splays are within the control of the applicant or form part of the adopted road infrastructure. The requisite notices have been served on landowners under Section 42 of the Planning Act Northern Ireland 2011. It concludes with the traffic on Quarterlands Road is not a noise generator such that a noise impact assessment would be required in support of the planning application. Equally the subject site is not an air quality management area and given the small scale of the proposed development no concerns have been expressed in respect to the impact of carbon emission arising from the minor increase in road traffic as a result of the proposal from the Council's Environmental Health Department.

1950

As part of Green House Gas Control the emissions from 69 cars/vans coupled with the burning of fossil fuels heating these large homes will increase the Carbon Dioxide in the atmosphere thus adversely affecting climate change which is against the principles in LDP2032 which the LCCC has adopted. This development by its destruction of the large central hedge and scrubland is no way is to off set the carbon production from human activity. This development will in no way help to get to Net zero.

1960 Referring to TRICS database along with transport assessment form "TAF". It concludes that there would be only minimal changes in traffic flows when comparing 85th percentile or average peak hour flows. This follows the Atkins Transport Report dated August 2023 which was commissioned by the developer.

That Report estimated 118 total vehicle movements a day 'which equates to 10 vehicle movements per hour'.

The Report failed to consider vehicle movement by delivery services (Amazon, Tesco, M&S, Sainsbury's to name a few) or service vehicles (e.g. bin lorries and ambulances).

1970 It also appears to have averaged out the 118 vehicular movements over a 12 hour period. While peak periods are provided (8-9 am and 5-6pm) this is not taken into account when estimating vehicular movement. The vehicular averaging used ignores peak periods such as the beginning of the school or work days, or the end of each. Vehicular movement at these times occurs within a more concentrated period than an hour and could result in a tail back of cars leaving the proposed development. The fact that cars will be exiting the proposed development onto the Quarterlands Road at these peak times when that road already experiences a high volume of traffic at these times requires that a full traffic survey is completed to ensure road safety given the serious width limitations of the Quarterlands Road along its length from the Ballyskeagh to Hillhall Roads.

The Atkins Report does not address road speeds other than to estimate the average of 29 mls per hr with likely associated risks to residents, cyclists or other road users. The safety issues are inadequately addressed within the Rebuttal Report and need further analysis;

1980 According to the Developer the carriageway is designed to standard and swept path analysis has been undertaken. The opportunity for visitor parking on the internal carriageway are identified on the proposed site plan which I presume means that noted on street parking which I don't remember had any visitor tagged to it. We then get another paragraph on the shared surface arrangement identical to the previous one.

1990 *91 The traffic on Quarterlands Road is not a noise generator such that a Noise Impact Assessment would be required in support of the planning application. Equally the subject site is not in an Air Quality Management Area and given the small scale of the proposed development no concerns have been expressed in respect to the impact of carbon emission arising from the minor increase in road traffic as a result of the proposal from the Council's Environmental Health Department.*

The potential for tailback of traffic exiting or entering the proposed development and at the intersection of the Quarterlands Road with both the Ballyskeagh and Hillhall Roads, particularly during peak times and the probability of increased emissions needs to be addressed. **The Council's Environmental Health should ensure a full assessment is undertaken to take account of the likelihood of traffic congestion caused by tailbacks generated by the proposed development;**

2000

REBUTTAL STATEMENT PAGE: 71.

91 The traffic on Quarterlands Road is not a noise generator such that a Noise Impact Assessment would be required in support of the planning application. Equally the subject site is not in an Air Quality Management Area and given the small scale of the proposed development no concerns have been expressed in respect to the impact of carbon emission arising from the minor increase in road traffic as a result of the proposal from the Council's Environmental Health Department.

The noise and emissions alone from 69 residents cars/vans in addition to which service vehicles of all kinds traversing the site will contribute significantly to the carbon in the atmosphere... The tranquillity of the area will be sacrificed all in a "Cause" producing unneeded, unaffordable homes mainly for the rich. Noise will increase from the number of humans alone on the site and thereby the mental health from the surrounding residents will suffer.

2010

It notes that DfI Roads has to date raised no objection. DfI Roads has, however, provided no comment on the developer's recent Plans which;

- (i) details that there will be no footways within the proposed development and
- (ii) the provision of 14 On Street Car Parking areas sited on the Internal Carriageway in the proposed development along with the additional 55 in curtilage spaces.

A view from DfI on such issues is required to ensure the protection of pedestrians, cyclists and those with a disability, particularly of a visual nature;

[SEE APPENDIX 1 : SHARED SURFACE ARRANGEMENTS](#)

2020

REBUTTAL STATEMENT PAGE: 72

96 The access onto Quarterlands Road makes provision for returning footways and a Pedestrian Crossing Point (PCP) to facilitate safe pedestrian movements along Quarterlands Road and into the development. Two additional PCPs are also proposed to the north and south of the site access. The PCPs will provide safe crossing points to the existing footpath on the western side of Quarterlands Road. The arrangements provide safe and convenient pedestrian access to and from the development. The provision of the footpath along the site

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frontage can readily form an extended footpath, should DfI Roads or another party seek to construct an additional extent of footpath in the future. The internal carriageway then transitions into a shared surface arrangement which is considered appropriate for this low-density cul-de-sac. The scheme seeks to promote a low-speed vehicular environment by using a combination of road alignment, minimal level changes, material treatment of the carriageway, and quality planting to emphasise the domestic context and naturally traffic calm the development. The use of a shared surface arrangement also creates the opportunity for enhanced planting and the promotion of a quality residential environment.

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The rebuttal claims that the proposed development seeks to promote a low speed vehicular environment by using a combination of road alignment, minimal level changes, material treatment of the carriageway, and quality planting to emphasise the domestic context and naturally traffic calm the development. It also claims that the proposed development will have a minimal impact on traffic in the area.

It should be noted that there are times when the Quarterlands Road serves as a diversion route. On such occasions the road can be tail backed from the Hillhall to the Ballyskeagh Roads, or vice versa this is not an infrequent occurrence.

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A survey of road speed on the Ballyskeagh Road in Drumbeg B103, SID, 2020 to 2023 found that 80% of cars exceeded the speed limit of 40MPH. The Road Services estimate the speed on the Quarterlands Road as 80% at 29MPH. In view of these B103 results and the fact that the Quarterlands Road is used as a "rat run", especially when there are difficulties on the Hillhall Road, M1 or the Malone Road, a full speed and traffic survey on the Quarterlands Road is essential.

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- the Rebuttal Report claims there will be a negligible increase in traffic levels as quantified in the submitted Transport Assessment Form (TAF). It considers that the proposal would not result in an unacceptable adverse impact on the local road network or any way change to the character of the environment. It notes that DfI Roads has to date raised no objection. DfI Roads has, however, provided no comment on the developer's recent Plans which (i) details that there will be no footways within the proposed development and (ii) the provision of 14 On Street Car Parking areas sited on the Internal Carriageway in the proposed development. A view from DfI on such issues is required to ensure the protection of pedestrians, cyclists and those with a disability, particularly of a visual nature;

- the Rebuttal Report refers to TRICS database along with transport assessment form "TAF". It concludes that there would be only minimal changes in traffic flows when comparing 85th percentile or average peak hour flows. This follows the Atkins Transport Report dated August 2023 which was commissioned by the developer. That Report estimated 118 total vehicle movements a day 'which equates to 10 vehicle movements per hour'. The Report failed to consider vehicle movement by delivery services (Amazon, Tesco, M&S, Sainsbury's to name a few) or service vehicles (e.g. bin lorries and ambulances). It also appears to have averaged out the 118 vehicular movements over a

2070 12 hour period. While peak periods are provided (8-9 am and 5-6pm) this is not taken into account when estimating vehicular movement. The vehicular averaging used ignores peak periods such as the beginning of the school or work days, or the end of each. Vehicular movement at these times occurs within a more concentrated period than an hour and could result in a tail back of cars leaving the proposed development. The fact that cars will be exiting the proposed development onto the Quarterlands Road at these peak times when that road already experiences a high volume of traffic at these times requires that a full traffic survey is completed to ensure road safety given the serious limitations of the Quarterlands Road along its length from the Ballyskeagh to Hillhall Roads. The Atkins Report does not address road speeds and likely associated risks to residents, cyclists or other road users. The safety issues are inadequately addressed within the Rebuttal Report and need further analysis;

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NORTHERN IRELAND WATER

REBUTTAL STATEMENT PAGE: 73

97 NI Water confirmed via email (24th August 2023) that connection remains available for 17 no. units to the existing foul drainage network.

Drumbeg WwTw

In the 2019 version of LDP2032 Draft plan strategy it indicated that from at least 2018 the Drumbeg WwTw was at capacity. Since then at least 10+ houses have been built with the Foul sewerage connected to the Drumbeg WwTw

2090 In March 2022 NIWater identified again that Drumbeg WwTw was at capacity.

In June 2023 In the Adopted Plan Strategy 2023 in the HRA section it states that Drumbeg WwTw was at capacity. Furthermore, in June 2023 NIWater advised that waste water network capacity issues had been identified within the Drumbeg catchment.

VOLUME FOUL SEWAGE FROM 17 HOUSES PLANNED FOR QUARTERLANDS ROAD.

From the internet, the quantity of foul waste produced per day per person is 150 litres(0.15m³)

For 17 properties that equates to 12.75m³/day

2100 To put this in perspective a typical heating oil delivery lorry carries about 5m³ of oil, so the waste water output from the site based on the internet figure of 150 litres per person per day is equivalent to 2.5 such lorries per day.

This volume of foul sewage is delivered into the Combined Sewer in Quarterlands Road into a network probably laid down in the 50's or 60's. In order that the combined sewer in Quarterlands Road can accept this large daily volume (not taking into consideration the extra daily volume created by those working from home), offsetting of at least an equivalent volume of Storm water upstream from the site has to occur. As presently this cannot occur the risk of not only sewage backing up into the application site but into the present residential area is significant as there are already network problems in the area properties.

2110 In December 2022 NI Water in answer to a letter to Emma Little- Pengelley MLA stated "No further connections are being permitted and Drumbeg WwTw has been closed to future development"

In February 2023 a similar letter was received by David Honeyford MLA stating "Drumbeg WwTw is currently at capacity. Any new planning applications received by Ni Water for consultation, since the works reached capacity, would receive a negative response recommending that the Planning Authority do not approve the application".

To our knowledge no update is planned for the Drumbeg WwTw

With the Drumbeg WwTw at capacity since at least 2018 it is inconceivable that the old pipes in the combined sewer can accommodate this volume in the pipe network in addition to the present over capacity at Drumbeg WwTw ,

2120 Also on page 71 of their rebuttal document with regard to storm water they comment that once the planning approval has been granted then the consultation process for it will proceed remains valid until 5th April 2024.

DFI RIVERS

REBUTTAL STATEMENT PAGE: 74

103 The DfI Rivers' flood mapping indicates that the site is not affected by fluvial flooding and there are no historical records of flooding on the site.

2130 Storing water beneath the ground prior to discharging at a green field runoff rate to the local water course via the new NI Water requisition sewer appears to be the plan. The potential for flooding and for sewage to leach is significant. Recent videos of the proposed development site provided to Planners shows the quantity of ground water with which the site currently deals. Already homes in the area have issues relating to storm water and sewage. Such matters are critical for public health and the quality of life of existing residents. The idea of controlling in a regulated run-off the volume of water recently experienced during storms Agnes and Ciaran should serve as a useful red flag.

Q APPENDIX 1: SHARED SURFACE ARRANGEMENTS

SHARED SURFACE ARRANGEMENTS

2140 In shared surface arrangements the principle is that street design needs to be inclusive to meet the requirements of all users. In traditional street layouts, footways and carriageways are separated by a kerb. In a street with a shared surface, this demarcation is absent so pedestrians and vehicles can share the same space.

The definition of a shared surface is “A street or place designed to improve pedestrian movement and comfort by reducing the dominance of motor vehicles and enabling all users to share the space rather than follow the clearly defined rules implied by more conventional designs”.

2150 In the design principles for shared space arrangements a shared surface street layout for a road is not the same as providing a road but omitting a footway or footways. In England many areas wishing to put in shared space arrangements will require the application to be supported by a Quality Audit. This is as outlined in Manual for Streets, Manual for Streets 2: wider application of the principles, local transport note 1/08 and traffic advisory leaflet 5/11 demonstrating that the requirements of non-motorised users have been considered and satisfactorily addressed.

Shared surface arrangements must be designed such that they are suitable for blind or partially sighted people because conventional kerbs are commonly used to aid their navigation. The absence of a conventional kerb as in this Application may pose some problems as this feature is often used to find their way around. It is therefore important that shared surface schemes include an alternative means for visually impaired people to navigate by.

Also when designing shared surface schemes, attention to detail is required to avoid other problems such as:

- Undifferentiated surfaces leading to poor parking behaviour.
 - Vulnerable road users feeling threatened by having no space protected from vehicles and
 - The positioning and quality of street lighting and other features creating visual clutter.
- 2160

There must be adequate provision of way finding methods which are suitable for the blind and partially sighted. Level surface streets are a kind of shared space where there is no vertical differentiation therefore providing a single shared surface. Level surface streets are only appropriate for short stretches in locations with low to very low vehicle flows.

The needs of different groups of people need to be considered including disabled people (mobility impaired, blind/partially sighted, hearing impaired), children and elderly people. This street type is not suitable to serve developments predominantly housing older or disabled people for example housing for over 55s and supported or sheltered housing.

2170

QUALITY AUDIT

A quality audit should include:

- A review of the function of the street
- A road safety audit including risk assessment (DMRBGG119);
- An access audit including emergency service vehicles, deliveries, and access for maintenance
- Walking, cycling assessment and review (DMRB GG 142)
- Materials audit
- Equality impact assessment
- 2180 • Parking audit

Where tactile paving is used to segregate protected zones, care must be taken to ensure these are detectable by the visually impaired whilst not hindering the movement of the mobility impaired. Planting on service strips should be with a shallow root system (usually grass) located within the service strip. No bushes or trees should be planted. Main services must be provided in a manner whereby repair and maintenance can be carried out without obstructing passage.

Lord Holmes Report(2015)

2190 In 2015 Lord Holmes surveyed the impact of shared spaces on the public in towns and cities in the United Kingdom i.e. England, Wales, Scotland and Northern Ireland. The title of his review is "Accidents by Design: The Holmes Report on "Shared Space" in the United Kingdom. The survey was carried out between 26th March and 30th April 2015 and reported on 614 fully completed questionnaires. Respondents to the survey covered over 100 shared spaces in the United Kingdom.

Executive summary reads as follows

Shared space described by users as:

"Lethally dangerous" (Pedestrian)

"Absolute nightmare that I avoid if I can" (Driver)

"Shared space is a false promise with poor delivery" (Cyclists)

Key Findings:

- Peoples experiences of shared space schemes are overwhelmingly negative
- 2200 • Over zealous councils are risking public safety with fashionable "simplified" street design
- Over a third of people actively avoid shared space schemes
- 63% of people who have used shared space schemes rated their experience as poor

- Significant under reporting of accidents in shared space

Key Recommendations

- Immediate moratorium on shared space schemes while impact assessments are conducted
- Urgent need for accessibility audits of all shared space schemes and a central record of accident data including “courtesy crossings” which must be defined and monitored.
- Department for Transport must update their guidance so that local authorities better understand their responsibilities under the Equalities Act.

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This survey asked people with experience of shared space for feedback on using these schemes. The response was extraordinarily negative. This survey clearly shows just how misguided a planning approach that aims to “improve pedestrian movement and comfort” and “enable all users to share space” is when users actually report “anxiety”, “fear” and in over one third of cases a refusal to use the space at all. People constantly referred to finding the schemes “frightening”, “intimidating”, “dangerous” and “never feeling safe”. The majority of respondents were pedestrians but they had an extraordinary broad range of users from pedestrians with and without disabilities, to drivers, including professional drivers and cyclists. The survey results also highlighted a worrying trend of under reporting of accidents.

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Lack of evidence about the impact of these schemes ranges from an absence of accessibility audits, user experience analysis and accident data. It was noted in the report that the claims made on behalf of shared space have overstated the available evidence.

USE OF SHARED SPACES

Most respondents to the survey walked in shared spaces (61%). Of the remaining sample, 12% cycled and 24% drove a vehicle (69% of these were cars, 30% were driving in a professional capacity: bus, van or lorry). The remainder of the respondents were wheelchair users.

2230 RATING OF EXPERIENCE USING SHARED SPACES

63% of the sample rated it as poor, 19% as fair and 18% as good. This pattern of response was reflected across most choices of travel with 66% and 64% of drivers and pedestrians rating their experience as poor with nearly half of the cyclists (48%) reporting their experience as poor. Higher rates of poor experience were also seen for respondents regardless of gender (female 66% male 60%) or whether they reported a long standing condition or disability (disability 70%; no disability 57%).

PEDESTRIANS

2240 Pedestrians constantly reported feeling scared and unsafe, indeed a shocking 35% said they “they would go out of their way” to avoid a shared space. Pedestrians felt intimidated and bullied by cars and the issue of crossings was particularly problematic. People commented on poor visibility when trying to cross roads, often due to parked cars and vehicles not stopping to allow them to cross. One respondent summed up the shared space they used” as “lethally dangerous”. In poor light or glare or shadow, drivers cannot see pedestrians. Disabled people and those with poor sight or mobility cannot protect themselves. The idea behind such spaces depends on every user being 100% able and 100% alert at all times which just doesn’t happen in real life . I consider this whole idea to be completely (and criminally) insane”.

2250 One blind user unable to access a local shared space independently said: “For people with no sight like myself they are a death trap. I cannot express how terrible they are and how they make me feel so angry; to think all the people responsible for them expect us to use it when we cannot see. I use the one with my husband and never on my own”.

CROSSINGS

Pedestrians felt strongly in many areas that drivers did not recognise that an area was a shared space and were not slowing down to allow people to cross. It was also stated as a cyclist or pedestrian, you are never going to win a contest of might against a car or lorry, so it’s just intimidating.

2260 Parents with children reported that they found shared spaces most difficult to navigate when with children. A person with children noted that there were no clear boundaries for them. Road traffic was still moving at 20 miles per hour or more. I had to make sure we had their hands the whole time. Motor traffic often failed to give way at informal crossings and lack of pedestrian priority crossings meant you had to basically take your chances or wait a long time to cross the road. For wheelchair users they stated that “other shared space users seemed to think that wheelchairs have independently controlled brakes or that wheelchair users can power – move themselves out of potential dangerous situations”. Blind and visually impaired respondents, whether guide dog owners or white cane users, found crossings impossible.

KERBS

2270 Lack of kerbing was a common element of shared space design known as level surface. This causes particular problems in terms of losing the sense of “safe” space. One parent stated “when I was walking with my young children who were taught to walk on a pavement and stop at a kerb I almost lost my young daughter who ran into the path of a large car which appeared not to moderate its speed to accommodate the shared space”. As stated many blind people use kerbs as an essential navigational tool and one stated “I could not use the shared space safely as there was no definition of a kerb to tell me where the pavement started or ended. I would not be able to use them on my own”.

Materials

Paving material used in shared spaces is found to be slippery especially after rainfall leading to accidents with mobility impaired or sight impaired falling.

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DRIVERS

Car, lorry and bus drivers were exasperated with shared spaces that they have to use and constantly refer to the schemes as “frightening”, “scary”, “dangerous”, and “unsafe”. Drivers consistently reported being unsure of who had right of way in a shared space and although the intention of removing clear signals about who has right of way is to encourage courtesy the result actually seems to be confusion, chaos and constant near misses. Drivers also noted that drivers from outside of the area are particularly dangerous – they drive at their normal town speed despite not understanding the layout. If the aim was to get cars to drive more carefully because of the lack of demarcation, it fails miserably – they drive at the same speed but more dangerously.

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And sadly often generating rage rather than consideration: “I absolutely hate driving through it. I understand the concept is to make drivers more aware of their surroundings and thus improve their awareness of pedestrians, other vehicles etc. However I drive through it and my tension levels increase, I become stressed and rather angry on occasion, I find myself muttering about moronic town planners and going through the shared space zone just generally makes my stress levels sky rocket and actually it is the only time when driving that I feel anything close to road rage when some other road users acts in an unexpected way. Honestly, the pavement is for pedestrians, the road is for cars”.

CYCLISTS

2300

Those who cycled in shared spaces again described their experience as dangerous, that they felt unsafe and intimidated, particularly when cars arrived at speed into shared spaces from faster roads. One cyclist summed the situation up as: “Good for nobody. It is dangerous to share with cars due to driver lack of patience and courtesy. Sharing with pedestrians is confusing for everyone, usually unmarked, slow, and knowing for all users”.

“Shared space is a false promise with poor delivery “sharing is never on equal terms – as a confident but anxious cyclist, I usually “ win the sharing transactions” but if a particular driver doesn’t want to yield, they won’t. These junctions are entirely unsuitable for cyclists who are not confident, thus they protect the strong not the weak.

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ACCIDENTS IN SHARED SPACES

In total 28 respondents to the survey had been involved in an accident in a shared space, 11 of which had been involved in more than one accident. Only 3 of these incidents were reported to the police,

with a further one reported to the local council. Accidents included pedestrians being hit by vehicles and bicycles, cyclists being hit by cars and people stumbling on ridged surfaces.

CONCLUSION

2320 Regardless of their mode of transport, disability status or gender, this survey found an overwhelming majority of respondents did not enjoy using shared spaces. This survey also found a third of respondents go out of their way to actively avoid shared space schemes. Respondents who did use them described feeling intimidated, anxious and frightened, not only for their own safety, but also for the safety of others. If the stated intention of shared space is to “improve pedestrian movement and comfort” and “enabling all users to share the space” (DfT2011) the predominantly negative feelings towards such vast number and varied assortment of shared spaces across Britain raises significant questions about how well local authorities are designing and evaluating the impact of these urban designs on their users. The pattern of non-reporting of accidents to the police seen in this survey is extremely worrying.

2330 The recommendation from this survey remains that there is an urgent need for an immediate moratorium on share space until there is more and better evidence about the impact of shared space schemes including an improved (central) record of accident data and a better understanding of the consequences of people literally designed out of these spaces.

Q APPENDIX 2: BARN OWLS - EYEWITNESSES

EYE WITNESS ACCOUNTS OF BARN OWLS

From: [steven mcintosh](#)
Sent: 11 September 2022 21:56
To: roisin.mcdade@live.co.uk
Subject: Barn owl in Drumbeg

Hi Roisin

Thanks for calling earlier. Just to confirm, we live at 4 Zenda park, BT17 9LW. 2-3 weeks ago my wife and I were in our back garden late one evening when the sun had just gone down so it was about 9pm and I noticed something flying through the air along the hedge line at the bottom of our garden.

It flew behind our large tree at the bottom of the garden and appeared out the other side where the hedge turned and flew towards me. It was an owl. I later googled it and found it to be a barn owl. After seeing me in the garden it flew off towards the field again at the end of our garden.

Please let me know if you need any more information.

Thanks

Steven

BARN OWL EYEWITNESS REPORT

My name is Christopher McGettigan, and I am a solicitor in the firm of PJ Flanagan & Co. I was staying at 11 Rural Cottages, off the Quarterlands Road during the Christmas holidays. I decided to go for a run late afternoon of the 27th of December 2022. On my return route I came from Ballyskeagh Road turning on to Quarterlands Road and as I was approaching number 66 on left hand side of Quarterlands Road I spotted an owl flying past the apex of the gable end of number 66 and then crossing Quarterlands Road. It flew quite low over a house on the opposite side of the road into Hambleton estate. It was almost, but not completely, dark and I could clearly see the bird's silhouette against the grey sky.

I could clearly see that this bird was an owl. It had relatively large wings in relation to its body mass and it glided noiselessly overhead with very little flapping. It was very graceful flying in the near darkness. It clearly came from the direction of the fields to the rear of number 66 Quarterlands Road. I have been asked to make this statement by the Quarterlands Group and I am also prepared to swear an affidavit should the same be deemed necessary.

Christopher McGettigan

BARN OWLS

2340 A home range for the barn owls is the area that they use for hunting, roosting and breeding. The home range is comparatively huge. In the winter it can be up to 5000 hectares but in the summer with more food around it can shrink to about 350 hectares. This equates to 1 kilometre radius around the nest when they are breeding and about 4 kilometres radius at other times. Barn owl home ranges are never circular and can be almost any shape.

HOME RANGES IMPORTANT

Staying in one area enables barn owls to develop a highly detailed “mental map” of their home range. They memorise where the best hunting places are, favoured roost sites, their nest site, and a clear flight path that connects them all. Indeed the main way in which nocturnal owls manage to avoid flying into things in the dark is by remembering clear flight paths. This accumulated knowledge can mean the difference between life and death particularly during winter hardship or when they have a brood of young to feed.

If these flight paths are disturbed what is the expected result?

2350 A home range containing a pair of barn owls will generally use one nest site “possibly two”, and one to three main roost sites. Some of the sites are only used while the birds are nesting, others may be only used in winter. The suitability of the landscape however has got a major impact on barn owl ranges. Encouraging barn owls to nest, roost and forage the home range must also contain adequate foraging habitat and hopefully no barn owl death traps such as major roads.

It is important to stress that once a barn owl has established a home range it will almost certainly remain there for the rest of its life. They are also incredible faithful to their mates and to their main roosts and nest sites.

2360 The best foraging habitat is rough grassland with high population of small mammals such as mice, shrews and rats. This site has the best foraging habitat as it is rough grassland and because of its high ecological value should not be removed. The rough grassland also contains patches of rough tussocky grassland which also adds to the desirability for foraging for barn owls. Barn owls in Britain hunt over open fields – mainly lowland farmland – they are not woodland or urban birds. Nest boxes well designed and well positioned are perfect places for them to hide, roost and nest.

2370 Barn owl nests and roosts sites are often unnecessarily destroyed because of poor planning. Careful development with provision for barn owls can help protect and secure the long term future of a nest site. We are in the midst of a climate and ecological crisis which affects barn owls. They will die or fail to nest during prolonged cold weather and produce fewer young in wet summers. As frequent extreme weather events like these increase it is sadly inevitable that without more human help barn owl numbers will fall. Therefore to encourage our barn owl residents in our area to thrive we have to support all of the possible nesting and roosting areas plus the foraging areas not remove them.

Q APPENDIX 3: PLANNING HISTORY OF DRUMBEG WEST

PLANNING HISTORY of Drumbeg West a personal view from one of Quarterlands Group a lifelong resident of Quarterlands Road.

In Drumbeg West (which is NOT connected to Drumbeg East) development began in the 1950s when my parents built a new bungalow. The area was designated bungalows only.

Rural Cottages were built in the 1950s by the Council without bathrooms until my mother brought attention to this matter. The 1960s saw the development of Sandyhill and Zenda Park. The 1970s and early 1980s brought the development of Hambleden.

2380 A two-storey house was built on the Ballyskeagh Road in the 1950s without planning permission which was applied for after it was finished. The owner was not asked to take down the building to the appropriate size and this began the erosion of the area as in the meantime people chose to build two storey houses on the Ballyskeagh Road.

The bungalow rule was respected in the 60s, 70s, and 80s, it was only in the 90s and 2000s that Planners allowed 2/3 storey building at the entrance to Sandyhill and then Quarterlands Lane. These sites were objected to by local people, but Planners allowed them to be built despite the fact that these buildings do NOT respect nor fit in with surrounding settlements. Also SPPS 2015 4.23 - 4.32 and the present HOU 1, HOU 2, Hou 3, HOU 4, HOU 6 and HOU 8 are not honoured. Planners have allowed this to happen.

2390 I know all this because I have lived in Drumbeg West since the 1950s and I have watched the destruction of a wonderful village with a school, Play school nursery, shop, petrol pumps and industry disappear. Drumbeg is a village without infrastructure services and amenities being turned into a dormitory site NOT a community. A further comment points out that the Map West Drumbeg Village Plan by AR Urbanism Oct 23 is not correct.

Q APPENDIX 4: WHY PRESERVE THE PLACE

2400 Allowing developers to replace a biodiverse 160-year-old hedgerow and wild tussock grassland with ornamental landscaping is an environmental travesty that compromises the integrity of our ecosystems.

Here's a more emphatic breakdown of why planners should vehemently reject such proposals:

1. **Ecological Irrelevance:** Ornamental landscaping is a poor substitute for the intricate web of life supported by a 160-year-old biodiverse habitat. The ecological richness and resilience of native ecosystems cannot be replicated by manicured lawns and decorative shrubbery.
2. **Biodiversity Erosion:** The wanton destruction of a centuries-old natural habitat in favour of ornamental plants erodes biodiversity. Native flora and fauna adapted to the specific conditions of the original landscape are replaced with a curated selection that often lacks the complexity necessary to sustain local wildlife.
- 2410
3. **Ecosystem Services Sacrificed:** Natural habitats offer essential ecosystem services, including water filtration, pollination, and soil stabilization. Ornamental landscaping typically prioritizes aesthetics over these crucial functions, leading to the loss of services that are vital for environmental health.
4. **Historical Amnesia:** A 160-year-old hedgerow carries historical and cultural significance, acting as a living archive of the land's evolution. Allowing developers to erase this living history in favour of mere decoration perpetuates a disregard for the cultural value embedded in our landscapes.
- 2420
5. **Wildlife Displacement:** Ornamental landscaping does little to provide suitable habitat for the diverse array of wildlife reliant on natural ecosystems. Birds, insects, and other species that have coevolved with the original habitat face displacement and potential endangerment as a result of such shortsighted development.
6. **Climate Resilience Neglect:** Natural habitats are often well-adapted to local climatic conditions, contributing to the resilience of ecosystems. Ornamental plants, chosen for their appearance rather than ecological suitability, may struggle to withstand changing climate patterns, further exacerbating environmental fragility.
- 2430

Planners must learn to stand as stewards of the environment, safeguarding our natural heritage against the onslaught of shortsighted development. Rejecting proposals that sacrifice irreplaceable biodiversity for superficial aesthetics is not only a duty to the present but a responsibility to future generations who deserve a planet enriched by the continuity of its ecological history.

Q APPENDIX 4A: OPERATIONAL POLICIES COU15 AND COU 16

- COU 1 Development in the Countryside.
- COU 2 New dwellings in existing clusters.
- 2440 • COU 5 Affordable Housing.
- COU 8 Infill / Ribbon development.
- COU 12 Agriculture and Forestry
- COU 13 Necessary Community facilities in the countryside.
- COU 15 Integration and Design of buildings in the countryside.
- COU 16 Rural character and other criteria.

APPENDIX 4: OPERATIONAL POLICIES COU15 AND COU 16

Analysis of Non-Compliance with Operational Policies COU15 and COU16

Introduction:

2450 This report critically examines the proposed development against Operational Policies COU15 and COU16, referencing specific guidelines and criteria outlined in the policies. These policies cover various aspects of countryside development, emphasizing integration, adherence to design criteria, and preservation of rural character.

COU1: Development in the Countryside:

The proposed development lacks clear evidence of meeting the general criteria set out in Policies COU15 to COU16. Specific deficiencies include a failure to adequately address design considerations outlined in Policies HOU3, HOU4, and HOU6¹.

COU2: New Dwellings in Existing Clusters:

2460 The development fails to ensure that the new residential structures maintain the existing character of clusters. There is insufficient evidence demonstrating conformity with design criteria and contextual considerations, as outlined in Policies HOU3, HOU4, and HOU6¹.

COU12: Agriculture and Forestry Development:

The proposed development lacks clear demonstration of visual integration into the local landscape. Additionally, there is a lack of evidence proving that the development will not have an adverse impact on the natural or historic environment, as required by COU12¹.

COU15: Integration and Design of Buildings in the Countryside:

Several aspects of the proposed development are in direct violation of COU15. The building design is not in harmony with the landform, existing trees, buildings, and other natural features, which provide a backdrop. The reliance on new landscaping for integration is not sufficient, and ancillary works do not seamlessly integrate with the surroundings¹.

2470 **COU16: Rural Character and Other Criteria:**

The proposed development raises significant concerns in terms of rural character preservation. It is unduly prominent in the landscape, does not conform to traditional settlement patterns, and has the potential to adversely impact the rural character of the area. Additionally, there is insufficient evidence of compliance with the necessary services, access arrangements, and design guidance outlined in COU16¹.

Recommendations:

1. Comprehensive documentation and revisions are required to address the shortcomings identified in the proposed development concerning design criteria, integration, and adherence to specified policies.
- 2480 2. A detailed analysis of the design, landscaping, and ancillary works is necessary to ensure conformity with COU15 and COU16.
3. The development proposal should be revised to align with traditional settlement patterns, respecting rural character and complying with all specified criteria in COU16.
4. Compliance with design guidance publications, such as 'Building on Tradition': A Sustainable Design Guide for the Northern Ireland Countryside, should be ensured to enhance the quality of rural designs¹.

Conclusion:

2490 The proposed development falls short of meeting several key criteria outlined in Operational Policies COU15 and COU16. Addressing these deficiencies through comprehensive revisions and compliance with the specified guidelines is crucial to ensure responsible and contextually sensitive development in the countryside.

Footnotes

1. Department's publication, 'Building on Tradition': A Sustainable Design Guide for the Northern Ireland Countryside' (May 2012).

Q APPENDIX 5: AECOM REPORT AND NIEA LETTER DISCREPANCIES:

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CRITICAL OBSERVATIONS

1. **Developer's Report Bias:** The Rebuttal notes the bias in the AECOM Report, financed by the developer, indicating a predisposition in favour of the application.

2. **AECOM's Blind Reliance:** The AECOM Report's disclaimer raises concerns, as it assumes the accuracy of information provided without independent verification.

3. **Overlooked NIEA Letter (6th Jan 2023):** The Rebuttal overlooks a significant NIEA letter from 6th Jan 2023, which expressed concerns about potential harm to habitats and species.

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4. **Contradictory NIEA Statements:** Discrepancies arise between NIEA's letters, with the January letter outlining concerns and the **12th June 2023** letter claiming no issues, indicating a puzzling shift in perspective.

5. **Biodiversity and Ecological Value:** The NIEA letter highlighted the ecological value of existing vegetation, conflicting with the AECOM report and emphasizing biodiversity concerns.

6. **Incomplete Reporting:** The AECOM Report and Rebuttal failed to address vital biodiversity concerns raised by NIEA in January 2023, pointing to potential harm to priority habitats and protected species.

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7. **Reversed NIEA Stance:** The sudden change in NIEA's stance, expressing concerns in January 2023 and claiming none in June 2023, raises questions about the basis for this reversal, as there was no evidence presented to the contrary.

8. **Adherence to Wildlife Order:** The Rebuttal confirms compliance with Article 4 of the Wildlife (Northern Ireland) Order 1985, emphasizing minimal tree and hedgerow loss during bird breeding seasons.

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9. **Need for Rigorous Evaluation:** Discrepancies and inconsistencies highlight the need for a meticulous and impartial evaluation process to ensure comprehensive, impartial and accurate consideration of environmental impacts.

10. **Grasp of reality:** It doesn't seem to matter to the Developer if the site is in the Lagan Valley Regional Park (LVRP) AONB as when it suits the site is not and then in other statements the site is in the LVRP. This is crucially important and should be treated with due respect.

11. **Correct Information:** Data and information presented in a report for a planning application should be transparent and not presenting contrary or misleading information or flexible 'facts' It shows disdain for the residents by both the developer and the planning and stator authorities who permit it.

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Lisburn and Castlereagh Council

Supporting Evidence – Groundwater

Introduction to Groundwater

2550 Groundwater is water that is underground in both the loose material above bedrock and in bedrock itself. Contrary to popular ideas, groundwater is not like surface water in that, typically, it is not found in underground streams and lakes. Groundwater fills the tiny void space between grains of material or in the cracks in the ground. The proportion of voids in the ground affects how much water can infiltrate down through the ground to form what are known as aquifers. The greater the proportion of voids, the larger and more productive the aquifer will be.

2560 As an example, the Sherwood Sandstone Aquifer in the Lagan Valley contains 20 times more water than the Silent Valley reservoir can hold. Groundwater can range in age from being only a few hours old to a few thousand years old. The natural attenuation processes that go on in the ground serve to remove harmful chemicals and bacteria out of groundwater. The water itself dissolves out minerals in the ground so that it takes on similar chemical characteristics. Although groundwater quality is variable across Northern Ireland, in general, groundwater is naturally found in a condition that is suitable for drinking without the need for any treatment.

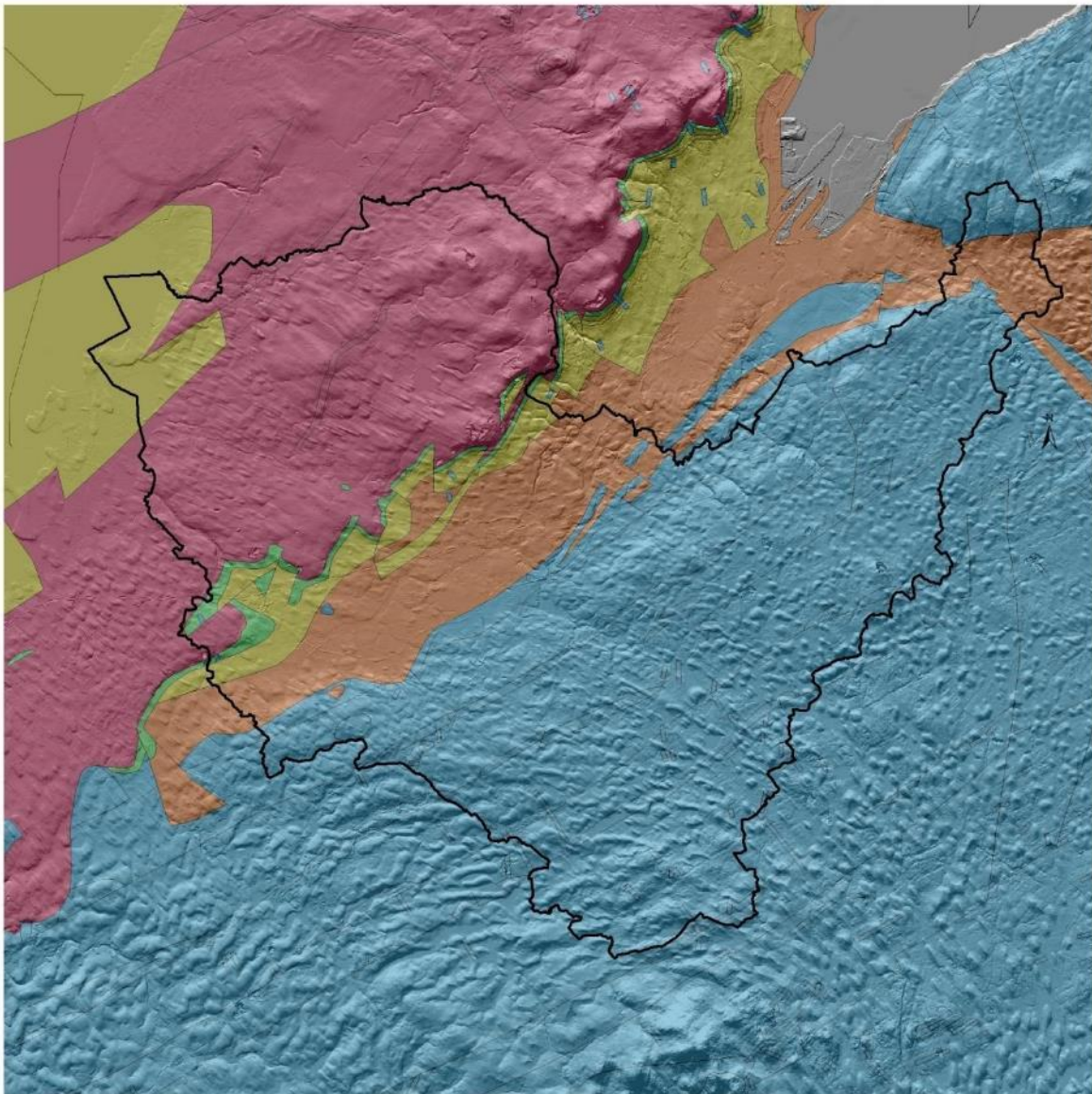
In regards to Local Development Plans, groundwater can be viewed as a natural resource that requires careful protection and as a water source that can be used for growth and economic development. It is important that both aspects are given consideration so as to look after the valuable resource and to use it sustainably to enhance and support future development needs.

General Groundwater Overview

The Lisburn and Castlereagh Council area covers an area with a wide variety of groundwater conditions. Figure 1 shows the distribution of different aquifer classes.

2570 The Sherwood Sandstone (SST) aquifer in the Lagan and Enler Valleys is shown as the orange band that runs from Moira up to Belfast and down to Newtownards. This is the most regionally important aquifer in Northern Ireland. The prospects for a reliable and significant water supply from this aquifer are high such that it has been used extensively for water supply for the last hundred years.

The red area on Figure 1, to the north of the LCC area is underlain by Basalt rocks. Whilst not presenting prospects as good as the SST aquifer, the Basalts have been exploited successfully by low to medium sized businesses in recent years. Many farms in this area use groundwater pumped from boreholes for a range of agricultural activities. Groundwater is stored and transported through extensive networks of fractures throughout the basalts.



**Geological Survey
of Northern Ireland**



	Lisburn_and_Castreagh
aquifer_class	
	Bh(f)
	Bh(f-k)
	Bh(l-f)
	Bl(f)
	Bm(f)
	Bp(f)

**Figure 1 - Aquifer Classification across the
Lisburn and Castreagh Council Area**

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The area of blue to the south and east of the LCC area is underlain by tight rocks commonly referred to as Greywacke. These present limited prospects for groundwater supplies. Some farms in this area use groundwater pumped from boreholes as well as some isolated properties not served by mains water. Groundwater is stored and transported in discrete fractures making it difficult to drill a reliable borehole.

2590 The area of mustard on Figure 1 shows areas of mudstone which do not present reliable prospects for a groundwater supply. However, the Sherwood Sandstone Aquifer sub ducts beneath the Mercia Mudstone Group on the northern side of the Lagan Valley making it accessible for acquiring a reliable supply across a proportion of the Mercia Mudstone Group.

The thin strip of green along the flanks of the Belfast Hills is the outcrop of the Chalk, or Ulster White Limestone. Channels of groundwater can form within this rock as demonstrated by the density of springs that issue in a line along the base of the chalk. However, securing a reliable supply of water from the chalk can prove difficult with limited knowledge of any operating boreholes or adits abstracting groundwater from the chalk.

Current Status of Aquifers

2600 In general, the current evidence shows that all of the aquifers within the LCC area are in a healthy conditions. The Sherwood Sandstone Aquifer (SST) is the most utilised, with much of the light to heavy industry that is based in the Lagan and Enler valleys, located there to enable access to the SST aquifer via vertical boreholes. Historically, the aquifer has been supplying water for industry for over a hundred years. Initially the carbonated water industry made use of it and then it was used to drive steam engines to power heavy industry. Abstraction from the SST aquifer declined with the introduction of mains electricity but in the 1970's the Lagan Valley Aquifer project saw an array of boreholes across the aquifer supplying mains water, with little or no treatment requirements. Northern Ireland Water centralised production of water to Lough Neagh and stopped abstracting from the SST aquifer in 2008.

2610 However, companies such as Coca Cola Hellenic Bottlers depend heavily on the water from the SST aquifer for their production. Coca Cola have a network of boreholes around their site at Lambeg and their new facility at Knockmore from which they are currently abstracting over 1 million litres of water per day and hope to expand this to 2.5 million in the coming years. The siting of the new facility was significantly influenced by the reliability and accessibility of the SST aquifer.

There are still significant prospects available for new abstractions to take place from the SST aquifer. One area in particular is around Dundonald where the only abstraction is by the Ulster Hospital.

The basalts are also under utilised. In areas such as Glenavy, Ballinderry, Stoneyford and Dundrod, records show that only small scale abstractions are being operated by farms and small industry with the potential for more abstraction likely.

Groundwater and LDP

2620 The prospects for groundwater abstraction within the LCC area are significant. The combination of the access to both water and transport routes makes the council area an attractive place for business and industry. In particular the Sherwood Sandstone Aquifer, as shown in Figure 1, has historically provided reliable water supplies for over a hundred years and is currently not being abstracted close to what it has been in the past. Current groundwater level monitoring suggests that the aquifer is capable of sustaining the current demand and is likely to be capable of sustaining significantly more sustainable abstraction. The coincidence of land zoned for business and industrial use above the SST aquifer would present an attractive prospect to businesses either seeking to expand, locate or relocate. Ensuring that such land remains available for groundwater abstraction is important to ensure the valuable groundwater resource is accessible.

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Sustainable Use of Groundwater

It is important that groundwater is used sustainably. Groundwater is recharged from rainfall infiltrating in to the ground. It is important that the rate of abstraction from an aquifer does not exceed the rate of recharge minus the ecological flow requirements of terrestrial water bodies such as rivers and lakes. If it does exceed it, groundwater levels will decline resulting in mining of groundwater.

It is possible to manage this using groundwater monitoring and modelling. Decisions on the capacity of the Sherwood Sandstone aquifer to sustain a level of abstraction should only be made following careful and extensive investigation, monitoring and modelling.

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Groundwater Regulation

Groundwater is regulated by the Northern Ireland Environment Agency (NIEA). All abstractions of groundwater over 20 cubic metres per day require an abstraction license from the NIEA to operate. The licensing system operates on a 'first come first served' basis. Therefore once an operator has a license, their investment is protected from others who may wish to use groundwater also.

Groundwater quality is also regulated by measures brought in by the EU Water Framework Directive.

These include Nitrate Action Plans to regulate mainly diffuse pollution by land spreading. The Pollution Prevention Control regulations require businesses to operate a license for the appropriate and careful management of all substances used during production processes. The principle upon

2650 which these regulations operate are the prevention of any hazardous substance being released in to the environment and the limiting of the release of non-hazardous substances.

DRUMBEG DRIVE WASTE WATER PUMPING STATION UPGRADE

Drumbeg Drive WwPS second largest pumping station in the City of Lisburn

2660 During its upgrade 2014-2015 the ground conditions were found to be particularly challenging including the presence of a sandstone artesian aquifer approximately 10m below ground level which constrained the viable options. Further negotiations with NIEA were needed and specialist contractor input was also needed. The accepted solution was a twin shaft construction adjacent to the existing station, retaining the existing control building to house new control panels. The presence of the aquifer has necessitated the provision of a concrete waterproof liner to the 1,500m³ storage tanks to prevent aquifer contamination. Provision of a permanent standby generator was also required to satisfy NIEA (in lieu of provision of 452m³ of emergency storage volume) as deeper tanks were not viable in the ground conditions

The Drumbeg Drive WwPS is only a few miles upstream from the application site and the Drumbeg WwTw

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Q APPENDIX 7: PARKING PROBLEMS ON PROPOSED SITE

PARKING (58 Car/Van Parking spaces excluding vehicles parked in 11 garages)

Of the 14 On Street Parking areas planned, 7 are on the first section of the carriageway with 6 on the right hand roadside. One of these on street parking areas is directly opposite the entrances to Sites 1 and 2 further restricting the road width at that point. The distance between parked cars/vans and the opposite service strip will need to allow for traffic to pass entering and exiting the sites simultaneously. The 4 Parking spaces opposite sites 16,17 will cause problems for those residents entering and leaving these sites in the presence of on-coming traffic.

2680 On entering the Southern section of the site there is 1 on street parking area causing a similar potential problem. In addition any car/van leaving site 6 their view of cars/vans approaching from the South of the Carriageway will be compromised by this single on street car/ van. The remaining 6 sites of on Street parking involve sites 7,14,15. There will also be similar problems for sites 7 and 14 . Is there adequate turning spaces for e.g. Delivery vans servicing these sites? In addition, there are 44 in-curtilage Parking sites excluding cars/vans in 11 garages.

2690 The approx. width of the access road (in carriageway) to all sites is 6M. The average width of a saloon car is 2 M leaving 4 M at the area of Parked cars for other traffic to enter and exit the site provided the cars/vans are parked tight to the service strip. For 2 average sized cars one entering and the other exiting simultaneously it is likely to be associated with wing mirror loss as they pass the parked car /van areas. Thus, at peak times of travel there is likely to be significant back up congestion. In addition, if the cars are 4x4 (average width 2.16M) or a Bin Lorry (2.25M) or large Van then only 1 vehicle can pass the car parked section at a time. This would also apply to a small transport bus picking up Disabled children or adults or any other type of vehicle like an Emergency Ambulance. Obviously if these latter 2 vehicles have to be stationary for some time at the site of patient pick-up and if this is at any of these on street car /van parking areas they will block any other traffic from entering or leaving the site at those positions. Not only will this result in marked Traffic congestion, but this will be a Fire Hazard.

Can it be confirmed that these allocated parking spaces and road widths are considered adequate for Health and Safety purposes?

2700 If there are for example one or two delivery vans or larger vehicles in the development, would Emergency services such as fire brigade or ambulance service be hindered in the event of an emergency? As there are many houses planned for this development and the demographic of the potential residents would suggest that there would be a significant reliance on shopping on-line. This would therefore result in a substantial volume of delivery vans into the site.

2710 The turning areas for vehicles servicing the sites are on the North and South ends of the Development. The Upper one 17.3 M from Toe to opposite service strip and 6 M wide should allow ease of turning although there is 1 Car/van Parking area allocated opposite to the toe. The lower on the South end with a Car Parking space on street would only allow small vehicles turning. The entrance in is 6 M wide and the Toe to Heel is approx. 15,5 M. With an on-street car parking space occupied this would restrict the turning of e.g. Bin Lorries - There is no allocated space on this site for Bin collection or bicycle racks.

In Summary 14 Car/Van allocated spaces on street in conjunction with Shared Street arrangement can only add to the potential for accidents, no safe walking or cycling with these street obstacles along with hazards to school children and disabled residents. In addition with the air pollution from so many cars/vans (58 Car/Van Parking spaces excluding Cars/Vans in Garages) and the noise created are against the Principles of LDP2032 and in particular contrary to the Sustainability Objectives of the LCCC Environmental Pillar.

Q APPENDIX 8: BATS

2720 Bats use different roosts, flight-paths and foraging areas throughout the year according to their life cycle and the availability of their insect prey, which are both influenced by the ambient conditions (temperature, humidity, rain fall, wind) at the location in question (Bat Conservation Trust).

Multiple surveys are usually needed to investigate temporal or seasonal changes in activity. It is often appropriate to collect data at least for one year if not longer. Short assessments (2 in September 2023) as in AECOMS October Ecological report would not be considered enough in order to record Bat activity not only foraging, commuting but also bat roosts.

2730 The central heritage hedge more than one and a half centuries old on site which the developer plans to remove provides insects particularly in the spring, summer and autumn months for Bats. In addition the riparian i.e. wetlands adjacent in the form of spring fed standing water and water logged conditions on the site (all year) along with wet ditches all provide very satisfactory foraging for all 4 Bat species found on the site by AECOM and documented in their report.

Environmental conditions

Environmental conditions affect Bat activity and therefore the weather conditions need to be checked prior to a Bat survey. This includes temperature, humidity, wind speed and precipitation all of which affect Bat activity. These variables need to be recorded at the start and end of each survey and if conditions change during the survey.

The effect of weather conditions on active bats is likely to be different for different species “with different flight capabilities” in different situations (for example open versus sheltered habitats)

2740 There are four species types of Bat recorded by AECOM on this potential building site. These are Leisler’s Bat, Nathusius Pipistrelle, Common Pipistrelle and Soprano Pipistrelle. The time and pattern of emergence of Bats varies from species to species. For example Common Pipistrelle emergence activity is between May and September and is not impacted by ambient temperatures at dusk, with average monthly temperatures ranging from 12.5 C in August to 7°C in September.

The aim should be to carry out such surveys in conditions that are close to optimal (with sunset temperature 10°C or above without heavy rain or strong wind), particularly where low numbers of surveys are planned as here. If Temperature drops significantly below this level during the survey the impact on Bat activity should be considered and in many cases it may be appropriate to stop the survey.

2750 In cooler, wetter and windier conditions Bats may not emerge, emerge later, forage for shorter time periods or carry out fewer foraging bouts. Wind and rain (with higher temperatures) appear to concentrate Bat foraging activity in more sheltered spots (for example the leeward side of hedges or in a woodland) in contrast to when weather conditions are apparently ideal, when Bats are more likely to be dispersed across the landscape.

The moon phase and the presence of artificial lighting can also impact on Bat activity and noise may also impact Bat activity.

Foraging habitats

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All UK bat species eat insects, so they look for places with lots of insects to hunt. Some Bats prefer waterways, others prefer woods or grasslands. Habitat choice can be species-specific and some Bats will journey further to seek the habitat they prefer.

Waterways and ponds provide Bats with the water to rehydrate – and they also attract midges and other flying insects, which congregate in the thousands and provide a ready feast for bats.

Trees, woodland and their associated shrubbery attract a wide variety of insects for Bats to prey on.

Grasslands and farmlands can also provide good hunting for Bats.

Species foraging habitat preferences

Of all four species of Bats found on the site the one and half centuries old Heritage hedge provides ideal foraging for insects particularly from the spring, summer to the autumn months. Also all 4 Bat species forage in riparian habitats

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i.e. wetlands adjacent to rivers and streams . On this site the spring fed standing water, the water logged conditions of the site throughout the year and the wet ditches provide the riparian habitat. It is thus very important that this hedge and scrubland be maintained for foraging for varying species of Bats found on the site.

Commuting habitats

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Bats use woodland edges, hedgerows, rivers and other linear features like the >100M long Heritage hedge as corridors to commute from one area of countryside to another. These features act as navigational landmarks and can also provide some protection from predators. As Bats fly through the night, their echo location calls bounce off these landscape features, helping the Bats find their way to and from their roosts and foraging habitats.

If Bats commuting routes are severed (for example by removing the 165 year old + hedge) Bats can be cut off from their foraging habitats, making it harder for them to hunt and survive. Therefore in order to encourage Bats these Bat friendly features need to be spread across the countryside rather than solely within protected areas. To enable UK Bat populations to flourish we need a diverse range of habitat so all our bat species can forage, roost and commute. . They are most active in the summer months when they come out of hibernation, hunt insects, give birth and raise their young. You are more likely to see Bats around sunset or sunrise in warm, dry weather. Some bats fly high in the sky while others fly low over water, some prefer grassland while others stick close to hedges and trees.

Not only will the removal of this Central Heritage hedge (which should be protected and retained) but also the scrub land throughout the site which is of high ecological value, interrupt foraging activities of Bats it will also interrupt their commuting and can also cause altering to the movement of Bats on the site.

To carry out 2 surveys in daylight in September is of limited significance as a survey of the site for Bats..