

# Belfast City Council

## Urban Capacity Study

Final | 20 March 2018

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Job number 255403-00

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# Document Verification

<b>Job title</b>		Urban Capacity Study		<b>Job number</b>	
				255403-00	
<b>Document title</b>				<b>File reference</b>	
<b>Document ref</b>					
<b>Revision</b>	<b>Date</b>	<b>Filename</b>	Methodology Report 1st Draft.docx		
Draft 1	29 May 2017	<b>Description</b>	First draft for discussion on 21.06.2017		
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Draft 2	27.10.2017	<b>Filename</b>	Urban Capacity Study 1 <sup>st</sup> Draft		
		<b>Description</b>			
			Prepared by	Checked by	Approved by
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Draft 3	04.12.2017	<b>Filename</b>	Revised following detailed comments from BCC		
		<b>Description</b>			
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		Signature			
		<b>Filename</b>			
		<b>Description</b>			
			Prepared by	Checked by	Approved by
		Name			
		Signature			

Issue Document Verification with Document



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# Executive Summary

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## Introduction

Belfast City Council is currently progressing its Local Development Plan 2020-2035 (LDP). The LDP will set out a strategy for delivering growth, managing change and protecting the natural and built environment. As part of this, the LDP will identify the amount and distribution of housing and employment land across the district.

Ove Arup and Partners Limited (Arup) has been commissioned by Belfast City Council (BCC) to undertake an Urban Capacity Study for the district. This is the first LDP to be prepared by the Council since the transfer of planning powers in April 2015 therefore it is also the first Urban Capacity Study to be undertaken.

It is an important part of the evidence base for the emerging LDP. However, **it does not determine whether a site should be allocated for future development, and does not constitute a land allocation. Land allocations can only be made through the LDP.** The Urban Capacity Study also does not grant planning permission for sites, or suggest that planning permission would be granted.

## Methodology

Planning Policy Statement 12 ‘Housing in Settlements’ provides a methodology for undertaking urban capacity studies. Given that it was published in July 2005 it is relatively outdated and does not take account of the context of the new two stage approach to LDPs introduced by the Planning Act 2011. In order to meet the requirements of the Strategic Planning Policy Statement (SPPS) a bespoke methodology has been developed, based around the 5 broad stages set out in the planning practice guidance for England and Wales, which provides useful information on the process for undertaking Housing and Employment Land Availability Assessments (HELAA).

- Stage 1: Sites identification
- Stage 2: Sites assessment
- Stage 3: Windfall assessment
- Stage 4: Assessment review (including indicative trajectory)
- Stage 5: Final evidence base

## Site Identification and Assessment

### Type 1 – Committed Sites

#### Housing

In total **629 Housing Monitor** sites were included in the Urban Capacity Study. This excludes sites which were yielding less than 5 residential units. **13** of these sites were found to sit either fully or partly outside the current urban footprint. These sites have a capacity of approximately **2,113 housing units**, the majority of which are likely to be detached or semi-detached dwellings.

**570 sites** within the urban footprint were deemed to be retained following 'absolute constraints' and the assessment of suitability, availability and achievability. The main justification for Housing Monitor sites being removed was evidence that the sites were coming forward for an alternative use. This was particularly relevant in the City Centre. It is important to note that not all Housing Monitor sites were reviewed. The study focused on the City Centre sites where there was a greater possibility of the sites being implemented for an alternative use. Of the 570 sites retained in the assessment, an indicative gross housing yield of around **18,998 housing units** was found. Not all of these sites might be expected to be built out within the 15 years LDP period.

#### Employment

**32 sites** were identified as having existing planning permission for employment uses (mainly office space) within the City Centre, yielding approximately **203,482m<sup>2</sup>** gross employment floorspace. Titanic Quarter has the potential to accommodate a further **100,000m<sup>2</sup>**

### Type 2 - New sites

#### All areas (excluding existing employment locations)

268 sites were identified within the urban footprint. 217 sites were retained after absolute constraints and the assessment of suitability, availability and achievability was undertaken.

Sites remaining following the absolute constraints and the assessment of suitability, availability and achievability.

- **118 sites** were suitable for housing with an indicative yield of **4,618 gross housing units**.
- **16 sites** were deemed suitable for employment use with an indicative yield of approximately **437,000m<sup>2</sup>** gross employment floorspace.
- **83 sites** were suitable for either housing or employment of a mix of both. These would provide an indicative yield of **5,068 housing units** or **742,681m<sup>2</sup>** gross employment floorspace. The vast majority of these sites are located within the City Centre, therefore it is likely that the type of development would be either apartments or Class B1a Office.

- A limited number of new sites outside the City Centre were identified as suitable for both housing and employment. Generally, these take account of mixed use sites such as Crumlin Road Gaol.

A high-level analysis of the type of housing likely to come forward from new sites based on the likely primary house type. Many development sites will provide a mix of housing types.

### **New sites within existing employment locations**

**44 sites** were identified within existing employment locations (as designated by draft BMAP). This includes Belfast Harbour major employment location producing an indicative yield of **421,819m<sup>2</sup>** gross employment space. 2 of these sites sit outside the current urban footprint, however the relevance of the urban footprint relates specifically to future housing development.

### **Windfall Assessment**

The SPSS highlights that *‘windfall potential is central to the assessment of future housing land requirement and is a key element of the urban capacity study’*. *Windfall potential arising from previously developed land within the urban footprint can be a key source of housing supply over the course of the plan period’<sup>1</sup>*.

The SPSS goes on to note that a ‘full allowance’ should be made when deciding the number of sites to identify for development in the plan to prevent excessive allocation of housing land.

Allowance can be made on the basis of examining past trends in windfalls coming forward for development and estimating likely future windfall potential. It is recognised that there are a range of methodologies for calculating windfall. The methodology used should be robust and care should be taken to avoid under-estimation of windfalls.

### **Historic windfall delivery**

An historical analysis of windfall using Housing Monitor Data is shown in Table 12. Over a similar period to the new LDP (15 years from 2000-2015), small windfall sites (yielding less than 5 units or 0.1ha) produced **1,403 housing units with an average of 94 units per annum**.

Sites above this threshold on ‘unzoned land’ provided a significant contribution of **18,662 housing units** with an average of **1,244 units per annum**.

It is also important to note that there was approximately 1,331 units identified within the Housing Monitor which were excluded from the capacity figures as the sites yielded less than 5 units, therefore would be considered as windfall.

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<sup>1</sup> SPSS, p72

## Estimating future trends

The main differences between the existing and emerging policies which may impact on windfall delivery are:

1. Draft BMAP contained a substantial quantum of 'whiteland' i.e. un zoned land, which may have led to an historically high windfall figure for larger sites;
2. The housing strategy in draft BMAP was linked to the envisaged housing growth in the RDS (Housing Growth Indicators). The emerging LDP seeks to accommodate a growth aspiration of 26,430 new housing units during the plan period (2020-2035) plus any shortfall in the period prior to 2020, therefore is likely that a much more proactive approach will be taken to the zoning of land for housing and key site requirements for mixed use sites.

Whilst it is too early to draw robust conclusions on the how emerging policy context will impact on future windfall, both of the factors above suggest that the high level of windfall sites of 5 or more units is unlikely to continue under the new policy approach. The approach taken to the zoning of sites will therefore be critical. The urban capacity study should be reviewed following the Plan Strategy stage and at regular stages during plan implementation.

As the Local Plan progresses, the Council should continue to assess the impact that its policies might have on the delivery of windfall sites, and whether this impact should be reflected in any windfall assumptions.

## Assessment Review

UK Guidance suggests that, once sites have been assessed, the development potential of all sites should be collated in order to produce an indicative trajectory. The trajectory sets out how much development can be provided and at what point over the Plan period. The trajectory helps to consider whether enough deliverable and developable sites have been identified to meet need in the district. The actual delivery of housing will be influenced by market demand and other factors.

The trajectory illustrates that there is likely to be sufficient housing sites available to satisfy the estimated growth of Belfast over the plan period. Based on the average annual requirement of approximately 1,762 units, the 5-year requirement would be 8,810 units. Committed housing sites are likely to satisfy the 5 years housing supply.

UK Guidance states that, if insufficient sites have been identified against objectively assessed needs, plan makers should revisit the assessment and/or investigate how this shortfall should be best planned for. The study indicates that the required growth in Belfast cannot be accommodated entirely within the urban footprint. 60% of the estimated future housing growth would indicate that 15,858 units should be located within the urban footprint to meet the RDS requirement. This can be achieved in Belfast, however it will be important to encourage residential development within the City Centre on those sites which have been deemed to be suitable for both housing and/or employment use.

There is well in excess of the land required for future employment land. It is recommended that BCC review the capacity figures in conjunction with the estimated growth in particular types of employment space to ensure that suitable sites are allocated for the various types of Class B use. Given the excess of potential employment space, it is also recommended that BCC review existing employment zonings with the view to provision additional housing.

These figures should be viewed in the context of the Urban Capacity Study's role as a 'policy neutral' assessment. A number of the sites judged to be suitable for development in the assessment may not meet the strategic objectives of the Council. It is the role of later stages of plan making to consider which sites should be allocated in the Local Policies Plan.

The Council should continue to monitor the trajectory, and take into account any updated information or assumptions in relation to its inputs, e.g. completions, housing land supply and the windfall allowance.

# 1 Introduction

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Belfast City Council is currently progressing its Local Development Plan 2020-2035 (LDP). The LDP will set out a strategy for delivering growth, managing change and protecting the natural and built environment. As part of this, the LDP will identify the amount and distribution of housing and employment land across the district.

Ove Arup and Partners Limited (Arup) has been commissioned by Belfast City Council (BCC) to undertake an Urban Capacity Study for the district. This is the first LDP to be prepared by the Council since the transfer of planning powers in April 2015 therefore it is also the first Urban Capacity Study to be undertaken.

It is an important part of the evidence base for the emerging LDP. **However, it does not determine whether a site should be allocated for future development, and does not constitute a land allocation. Land allocations can only be made through the LDP.** The Urban Capacity Study also does not grant planning permission for sites, or suggest that planning permission would be granted.

# 2 Policy Context

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The Planning Act (Northern Ireland) 2011 requires councils to prepare a LDP. On 1<sup>st</sup> April 2015, as part of local government reform, Belfast City Council assumed responsibility for numerous functions, including statutory planning and therefore the preparation of an LDP. Once adopted, this development plan will replace the Belfast Urban Areas Plan (BUAP), the Houses in Multiple Occupation (HMOs) Subject Plan for the Belfast City Council Area 2015 (December 2008) and other operational planning policy set out in Planning Policy Statements (PPSs). It will also supersede the draft Belfast Metropolitan Area Plan (dBMAP)<sup>2</sup>

The Statement of Community Involvement (SCI) and timetable were published in June 2016 and consultation on the Preferred Options Paper (POP) occurred between 26<sup>th</sup> January 2017 and 20<sup>th</sup> April 2017. The POP outlines the vision, objectives and key issues for Belfast during the 15-year plan period and identifies the Council's preferred options for development and growth.

It is essential that a robust and reliable evidence base supports the policy and strategy of the LDP. In developing the LDP to the POP stage, Belfast City Council have undertaken a large volume of research, including 18 thematic Topic Papers and specialist studies such as a Housing Growth Options Report.

In preparing for the next stage of the LDP plan-making process, the publication of a Draft Plan Strategy, it is essential that an Urban Capacity Study is carried out by, or on behalf of, Belfast City Council.

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<sup>2</sup> The adopted Belfast Metropolitan Area Plan (BMAP) 2015 was quashed as a result of a judgement in the Court of Appeal delivered on 18 May 2017. References to draft BMAP throughout this document refers to the most recent post-examination draft which was purported to be adopted and not the draft published in 2004.

The only guidance available to inform the preparation of urban capacity studies in Northern Ireland is set out in Planning Policy Statement 12 'Housing in Settlements'.

A summary of the policy context is provided below and a detailed account set out in Appendix A.

## 2.1 The Regional Development Strategy 2035

The RDS 2035 is the spatial strategy for Northern Ireland and provides an overarching strategic planning framework. The RDS acknowledges that housing is a key driver of physical, economic and social change and emphasises the importance of the relationship between the location of housing, jobs, facilities, services and infrastructure and must be taken into account when preparing a LDP.

The RDS provides strategic guidance through Regional Guidance (RG) and Spatial Framework Guidance (SFG) under the 3 sustainable development themes of the Economy, Society and Environment.

RG1 highlights the need to ensure an adequate and available supply of employment land to facilitate sustainable economic growth.

RG8 states that housing growth should be managed to achieve sustainable patterns of residential development by promoting development within existing urban areas and ensuring an adequate and available supply of quality housing.

The RDS seeks to promote more sustainable housing development within existing urban areas by encouraging compact urban forms recognising that there are significant opportunities for new housing on appropriate vacant and underutilised land, and sets a regional target of 60% of new housing to be located in appropriate 'brownfield' sites within the urban footprints of settlements greater than 5,000 population.

SFG1 aims to promote urban economic development at key locations throughout the Belfast Metropolitan Urban Area (BMUA) and ensure sufficient land is available for jobs, by identifying key locations for economic growth and directing mixed-use development towards sites which will enhance local regeneration initiatives.

The RDS aims for the population of Belfast City to be 300,000 by 2021 which was the level achieved in the 1980s. Key to population growth will be the provision of housing. These additional dwellings will be provided on land already zoned for housing and on windfall sites which become available for development. Assessment is also needed of the scope for higher densities in appropriate locations, particularly at gateway sites into the City Centre, on arterial routes and at transport interchange areas.

SFG3 aims to enhance the role of Belfast City Centre as the regional capital and focus of administration, commerce, specialised services and cultural amenities

Belfast City Centre will continue as the primary office location in Northern Ireland. Growth in the business and service sectors will be the main driver for new

offices and while most will locate in the City Centre, some business uses assist regeneration initiatives particularly in areas of deprivation beyond the City Centre.

The RDS 2035 identifies regional housing needs through Housing Growth Indicators (HGIs) across Northern Ireland. The HGIs were updated in April 2016 to reflect the new District boundaries following local government reform. The latest HGI figures<sup>3</sup> suggest a growth of 13,700 units for Belfast between 2012 and 2025. This equates to 1,054 units per annum.

## 2.2 Strategic Planning Policy Statement (SPPS)

The 'Strategic Planning Policy Statement for Northern Ireland' - Planning for Sustainable Development (SPPS) recognises that good quality housing is a fundamental human need that plays a significant role in shaping our lives and our communities. The SPPS also states that the planning system can play a positive and supporting role in the delivery of homes to meet the full range of housing needs of society, within the wider framework of sustainable development. The policy approach must be:

- to facilitate an adequate and available supply of quality housing to meet the needs of everyone;
- to promote more sustainable housing development within existing urban areas; and
- to provide mixed housing development with homes in a range of sizes and tenures.

In preparing LDPs councils should bring forward a strategy for housing, together with appropriate policies and proposals that must reflect the policy approach of the SPPS, tailored to the specific circumstances of the plan area. Planning authorities must deliver increased housing density without town cramming, sustainable forms of development, good design and balanced communities.

It is a requirement of the SPPS that an Urban Capacity Study informs the LDP, which should be published as a technical supplement to the draft plan. The Urban Capacity Study should:

*'assess the potential for future housing growth within the urban footprint and the capacity for different types and densities of housing. The urban capacity study should take account of housing development opportunities arising from previously developed land, infill sites, conversion of existing buildings, and possible changes of land use. Consideration needs to be given to the type of housing and density appropriate to each site in order to assess the number of housing units likely to be generated.'*

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<sup>3</sup> Available from: <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/2012-based-housing-growth-indicators-hgis-and-methodology-paper.pdf.pdf>

Windfall potential is central to the assessment of future housing land requirement and is a key element of the Urban Capacity study. Windfall potential arising from previously developed land within the urban footprint can be a key source of housing supply over the course of the plan period. The scale of the windfall housing allowance will vary from area to area and may depend on the approach taken to the urban capacity study. Allowance can be made on the basis of examining past trends in windfalls coming forward for development and estimating likely future windfall potential. It is recognised that there are a range of methodologies for calculating windfall. The methodology used should be robust and care should be taken to avoid under-estimation of windfalls. Windfall should be regularly monitored because of its dynamic and changing nature, with monitoring data factored into the plans housing allocation when the LDP is reviewed.

Despite a requirement for an urban capacity study in the LDP housing allocation process, the SPPS does not provide a methodology under which the urban capacity study should be carried out.

## **2.3 Emerging Policy in relation to Housing and Employment Land**

### **2.3.1 Local Development Plan 2020-2035**

Stage 1 of the LDP process culminates in the publication of the Preferred Option's Paper. This provides the basis for consulting with the public and stakeholders on a series of options for dealing with key issues within the plan area.

To support the ambitious growth aspirations for the city, the LDP will allocate sufficient land to accommodate 37,000 new housing units during the Plan Period (Policy LP1). This target was developed through a detailed Population and Housing Growth Study<sup>4</sup>, which calculated the housing growth associated with different levels of economic and population growth. Although to be delivered by the end of the plan period, the 37,000 units relates to housing growth between 2014 and 2035, a period of 21 years. When calculated over the course of the 15-year plan period, this target is therefore reduced to 26,430 units. However, the new LDP will also need to take account of any shortfall in delivery against the annual target of 1,760 units between 2014 and 2020.

Policy LP1 notes that housing will be delivered in accordance with the following priorities:

- Increasing the density of housing development across the city of Belfast, focussing the highest density of development on the city centre and other locations which benefit from high accessibility to public transport facilities;

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<sup>4</sup> Housing Growth Options Report, 'Belfast City Population and Housing Growth Study' (October 2016), Available at: <http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/pop.aspx>

- Prioritising the re-use of previously developed land by setting an appropriate target for housing development on ‘brownfield’ land and encouraging the redevelopment of appropriate locations to contribute to urban regeneration;
- Concentrating growth within the existing settlement limits of the Belfast city urban area;
- Identifying opportunities for developments on the edge of settlements, but avoid any development in areas that could lead to the coalescence of our small settlements into the larger urban area; and
- Restricting housing development in the open countryside.

The LDP will seek to identify and maintain a flexible and varied supply of business accommodation and employment land that is of the right type and in the right locations. This is based on the ambitious level of economic growth – projecting the creation of c. 46,000 additional jobs over the plan period – to help Belfast compete with other cities across the UK.

Sufficient land will be identified to ensure between 486,400-608,000 sq m of floorspace can be supplied for B-Class employment uses to 2035, or 25,600-32,000 sq m on average per year. However, the approach to land supply will be flexible, based on the qualitative nature of supply, including its distribution across different growth sectors of the economy and different market areas of the city. The target of 448,000 sq. metres covering the period 2016-2030 was developed through an economic modelling system which converts Belfast’s employment forecasts into employment space requirements using employment density guidance published by the Homes and Communities Agency<sup>5</sup>. Broken down this equates to 32,000 sq. m per annum. Therefore from 2016-2035 there will be a forecasted demand for 608,000 sq. metres. When calculated over the duration of the plan (2020-2035) the forecasted demand is 480,000 sq. metres. However, the new LDP will also need to take account of any shortfall in delivery against the annual target of 32,000 sq. m between 2016 and 2020.

The POP identifies 8 Key Employment Locations that will be reviewed and new smaller opportunity sites identified to ensure projected employment needs are accommodated across the plan period (Policy VE2).

Existing employment land identified in draft BMAP will also be protected against competing uses (Policy VE3), with flexibility for alternative uses where employment land is not capable of accommodating similar employment uses.

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<sup>5</sup> Belfast City Council, ‘Assessing Employment Space Requirements across the City – 2015-2030’ (September 2016), available at <http://www.belfastcity.gov.uk/buildingcontrol-environment/Planning/pop.aspx>

## 3 Methodology

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Planning Policy Statement 12 ‘Housing in Settlements’ provides a methodology for undertaking urban capacity studies. This has been summarised in Appendix B. Given that it was published in July 2005 it is relatively outdated and does not take account of the context of the new two stage approach to LDPs introduced by the Planning Act 2011. A bespoke methodology has therefore been developed.

This urban capacity study is being prepared to inform the Plan Strategy and will be reviewed during the preparation of the Local Policies Plan. Development Plan Practice Note 7 notes that the ‘*Plan Strategy should address strategic housing issues such as the overall housing provision for each settlement and to set the framework for more detailed housing requirements such as zoning, key site requirements for specific sites etc in the local policies plan*’<sup>6</sup>. It also notes that a council should include strategic allocations of housing and employment land in accordance with the settlement hierarchy. Therefore, the key purpose of this urban capacity study is to assist with providing a robust and sound basis for the settlement / housing growth strategy and identification of strategic allocations.

Consideration has also been given to planning practice guidance for England and Wales (see Appendix B), which provides useful information on the process for undertaking Housing and Employment Land Availability Assessments (HELAA).

In order to meet the requirements of the SPSS a bespoke methodology has been developed, based around the 5 broad stages of the HELAA methodology.

- Stage 1: Sites identification
- Stage 2: Sites assessment
- Stage 3: Windfall assessment
- Stage 4: Assessment review (including indicative trajectory)
- Stage 5: Final evidence base

The detailed methodology for each of the 5 stages are set out in the rest of this section and Appendix B.

### 3.1 Stage 1: Site Identification

#### 3.1.1 Study Area

The SPSS requires councils to assess the potential for future housing growth **within the urban footprint**. Belfast City Council administrative area is largely urban, consisting of the Belfast Urban Area and the three rural settlements of Edenderry, Hannahstown and Loughview. Drawing 001 (Attached at Appendix B) illustrates the Belfast urban footprint boundary which was guided by the definition set out in the RDS<sup>7</sup>. The 2001 urban footprint baseline was used as the basis for establishing the current urban footprint. Minor changes (additions and

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<sup>6</sup> DfI, Development Plan Practice Note 7, p20

<sup>7</sup> DfI, Regional Development Strategy 2035, p111.

deletions) were made to align with GIS boundaries (e.g. ensuring the whole of a properties' curtilage was included etc.). The urban footprint boundary was extended in a number of places to account for new development since 2001. Some areas have also been removed where it was considered that these were wrongly included in the 2001 baseline.

It is important to note that there are committed housing and employment sites (i.e. those with extant planning permission / zonings) outside of the current urban footprint.

PPS12 recommends that urban capacity studies should be carried out for settlements of over 5000 population, which is in line with the RDS target of 60% urban housing growth to be in cities and towns over this size. Edenderry, Hannahstown and Loughview fall well below this threshold however PPS12 goes on to state that '*urban capacity studies should in a development plan preparation be undertaken for the highest and second highest tiers of settlement in each district*'. Therefore, the area of study includes the urban footprint of Belfast and the three smaller settlements.

### 3.1.2 Approach to urban capacity study

A comprehensive survey approach has been adopted, whereby the entire urban footprint has been surveyed on a desktop basis in accordance with the guidance set out in PPS12.

A sequential approach to the identification of sites was used. Firstly, focusing on those sites which have been previously allocated for housing and those with planning permission in place. New sites were then identified using a wide variety of data sources.

### 3.1.3 Character Areas

For the purposes of an urban capacity study it is useful to identify key character areas within the Belfast Urban Area. 5 distinctive areas have been identified (see attached drawing):

Table 1: Character Areas

Character Area	Description	Source / Method
Belfast City Centre	An area characterised by a mix of uses; residential development in such locations is usually high density, although Belfast also contains a number of lower density social housing developments.	dBMAP city centre boundary
Titanic Quarter	Titanic Quarter is a major mixed use development site which has the potential to accommodate major residential and employment use	dBMAP boundary
Inner City	Surrounding the City Centre these areas are characterised by high density residential developments, often	GIS analysis of existing built form

Character Area	Description	Source / Method
	including old established residential areas of terraced housing and early social housing (NIHE) developments interspersed with industrial uses and commercial development.	(Raster density analysis on terraced dwellings which was then generalised through digitising into vector format)
Strategic Centres	These locations are characterised by predominant commercial uses, acting as key service centres for surrounding communities. Ranging from large, bulky goods warehouses in district centres, to small retail units clustered on key transport routes, these areas often have good accessibility from neighbouring areas and are well served by public transport. As a result, higher density residential development can typically be supported in close proximity to key centres.	Local & District Centre zonings from dBMAP merged and with 200m buffer
Arterial Routes	Key transport corridors in to and out of the City are typically characterised by a mix of uses fronting onto a busy road. Clusters of small commercial units have often formed through the conversion or replacement of traditional residential units. Frontages onto arterial routes are typically surrounded by established residential areas;	dBMAP designated arterial routes. Buffered 50m either side of route alignment to capture road facing buildings
Wider Urban Area	These areas typically contain a greater proportion of housing to industrial and commercial development and the dwellings tend to be a mix of higher density, older terraced and semi-detached properties closer to the city, with larger scale semi-detached and detached private developments as you move into the suburbs. The majority of properties have gardens; with private developments in particular tending to be built in a low density.	Remaining area outside other characters areas delimited by the urban footprint boundary

### 3.1.4 Developing the list of ‘Candidate Sites’

The purpose of this stage was to identify the sites which should be assessed within the Urban Capacity Study process. A proactive approach to site identification was utilised, whereby the team sought to identify any vacant and underused sites which were then subjected to further assessment on their suitability, availability and achievability.

#### Type 1 – Committed Sites

Committed housing and employment sites were identified through consolidation of the following sources of information:

1. **Existing residential zonings set out within the draft Belfast Metropolitan Area Plan (dBMAP)** – the 2016/17 Housing Monitor (correct to 31 March 2017) was used to establish the current status of these sites (i.e. those completed, underway or where no development has taken place). Draft residential zonings were included within the Housing Monitor upon publication of the draft BMAP in January 2004, with the final zonings added in September 2014.
2. **Existing employment zonings set out in dBMAP** – dBMAP used to identify these sites.
3. **Sites with existing planning permission (outline or full) at March 2017 for housing (which are not zoned as housing within dBMAP)** - the 2016/17 Housing Monitor (updated incorrect to 31 March 2017). Note, Housing Monitor sites with a yield less than 5 units have been excluded from the urban capacity study and accounted for under ‘windfall’.
4. **Sites with an existing planning permission (outline or full) at June 2017 for employment use (which are not zoned for employment / mixed use within dBMAP)** – In terms of a size threshold we have included permissions on sites of 0.1ha (or 500m<sup>2</sup> of floor space). Data provided by BCC for employment uses from December 2011 until June 2017. Unlike the data provided by the Housing Monitor, the data on employment permissions does not confirm the status of the development i.e. has it been completed. Therefore, its inclusion would not be an accurate reflection of employment capacity. This study focuses on those permissions within strategic employment locations, existing employment locations and mixed-use sites in line with the emerging policy context set out in Policy VE2 and VE3 of the Preferred Options Paper.

Some sites may have a valid planning permission for both residential and employment use.

#### Type 2 – New Sites

New housing and employment sites have been identified through consolidation of the following sources of information:

1. **Identification of vacant land which has not been previously developed** (note: this does not include parks, playing fields and allotments) – we have used professional judgement when identifying sites. We did not use a specific size threshold when identifying sites, however if the potential yield fell below 5 residential units or 500m<sup>2</sup> employment space then the site was deemed to have an absolute constraint.
2. **Identification of derelict buildings which have been previously developed** - we identified sites / buildings which appear to be no longer in use, again applying 5 residential units or 500m<sup>2</sup> employment space as the threshold.
3. **Potentially incompatible land uses.** Sites which may be considered incompatible with (not just different to) nearby uses.
4. **Combinations of separate, possibly underutilised sites** - areas which together comprise an area of potential.
5. **Sites in Council ownership.** Sites that have been kept ‘intact’, i.e. they have not been merged with any other adjacent or overlapping sites. This is because the Council has control over these sites, so they can therefore be considered to be ‘available’ for development.
6. **Sites owned by Government Departments and Agencies.** Data was available for some publicly owned land however we were not able to verify its accuracy. NIHE provided information on sites which they considered to be surplus to requirements.
7. **Land identified for future housing or employment use in non-statutory Masterplans:**
  - a. Belfast City Centre Regeneration and Investment Strategy;
  - b. Greater Clarendon (Sailortown) Masterplan;
  - c. Greater Ballysillan Masterplan; and
  - d. Belfast East Bank Strategy (draft)
  - e. Building Successful Communities Programme – Actions Plans for various areas.

**This report presents the urban capacity findings for Type 1 and Type 2. We recommend that Belfast City Council review the findings and consider whether further assessment is required to include Type 3 and Type 4 below.**

### **Type 3 – Other land uses and conversions**

If there remains an insufficient supply of land suitable for the development needs of the Council following the initial assessment of Type 1 and 2 sites, the following sources may be considered:

1. A review of all existing employment allocations and consideration of whether some could be better used for housing or mixed-use development.
2. A review of existing green space allocations and consideration of whether some could be better used for housing or mixed-use development or

partially developed to improve the quality and surveillance over the open space.

3. Conversion of upper floors – Type 2 has taken account of buildings which are visibly vacant / derelict however it was not possible through this study to identify vacant upper floors of commercial buildings.
4. A review of existing housing allocations (which have not been developed) with a view to increasing densities<sup>8</sup>.
5. Sites where planning permissions have been refused but might be granted in future.

## **Type 4 – Call for Sites**

UK guidance encourages plan makers to issue a ‘call for sites’ which should be aimed a wide landowning audience so that those not normally involved in property development have the opportunity to contribute. This process helps to ensure that a variety of land options can be considered when preparing the LDP. It also helps to capture those sites which landowners are interested in being considered for development which may not otherwise be identified through the searches outlined above.

It was not considered appropriate to undertake the call for sites to inform the urban capacity study at this point in the LPD process. Consultation on the Preferred Options Paper completed on 20<sup>th</sup> April 2017 therefore there may be the risk of confusing the public should the call for sites be undertaken at this time. The purpose of this urban capacity study is to inform the housing strategy set out within the emerging Plan Strategy and the call for sites may be undertaken at a later stage in the LDP process.

### **3.1.5 Presentation of findings**

All sites identified for inclusion in the Urban Capacity Study have been given a unique reference ID, mapped and recorded in a bespoke database. Policy constraints have not been considered at this stage and all sites included for comprehensiveness. Constraints will be clearly set out and discussed at Stage 2, including where they severely restrict development.

## **3.2 Stage 2: Site Assessment Process**

### **3.2.1 Identifying Constraints**

To inform the site assessment process an exercise was undertaken to collate a wide range of information from various sources. The aim was to develop a system which enables the assessment of sites in the context of policy, infrastructure and

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<sup>8</sup> Note: The Housing Monitor assumes densities for zoned sites in draft BMAP which do not have a planning permission in place. The density assumption tends to be very low (around 25 dwellings per hectare). This density assumption has not been altered in this report. This will apply to a relatively small number of sites which are zoned in dBMAP but do not have an existing planning permission.

environmental constraints. The first stage was to identify sites that were subject to absolute constraints or other national/international designations that would mean the development of the site would likely cause significant social, environmental or economic harm in accordance with the RDS 2035.

Appendix C (Table 1) sets out the absolute constraints as well as justification for their use. Those that have been deemed to constitute an absolute constraint have been listed below:

1. Sites yielding less than 5 residential units of 500m<sup>2</sup> employment floor space;
2. Evidence that the site is being developed for an alternative use;
3. International Ecological Designations;
4. National Ecological Designations;
5. River (Fluvial) Floodplain; and
6. Areas of existing open space (as designated in draft BMAP).

UK guidance indicates that an important part of a desktop review of sites is to test again the appropriateness of previously defined constraints, rather than simply accepting them. Where a site falls *wholly* within one or more of these absolute constraints, it was not considered further in the urban capacity study. Sites which only partially fall within an absolute constraint were retained in the assessment. However, the extent of the absolute constraint has been taken into consideration when determining indicative site yield.

### 3.2.2 Suitability

UK Guidance notes that assessing the suitability of sites or broad locations for development should be guided by:

1. The development plan, emerging plan policy and national policy; and
2. Market and industry requirements in that housing market or functional economic market area.

We assessed the sites against policies set out in the draft BMAP. Following a recent Court of Appeal judgement, BMAP must be considered as a 'draft' rather than adopted plan<sup>9</sup>. For the purposes of the Urban Capacity Study, dBMAP provides the most relevant and up-to-date policy framework for the evaluation of urban capacity sites.

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<sup>9</sup> The adopted Belfast Metropolitan Area Plan (BMAP) 2015 was quashed as a result of a judgement in the Court of Appeal delivered on 18 May 2017. Although this means the Belfast Urban Area Plan (BUAP) 2001 is now the statutory development plan for the area, the draft BMAP, in its most recent, pre-examination, form remains a significant material consideration in future planning decisions. Draft BMAP referred to throughout this document therefore refers to that which was purported to be adopted and not the pre-examination draft published in 2004.

Sites zoned for residential or employment use within dBMAP and sites with planning permission are generally considered to be suitable for development.

UK Guidance states that the following factors should be considered when assessing a sites suitability:

1. Physical limitation or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
2. Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
3. Appropriateness and likely market attractiveness for the type of development proposed;
4. Contribution to regeneration priority areas; and
5. Environmental and amenity impacts experienced by would be occupiers and neighbouring areas.

Information used in the assessment of site suitability was gathered from a variety of sources and is detailed in Appendix C (Table 2).

The assessment was based on GIS analysis and site observations. The GIS analysis assisted with assessing the sites against national policies and designations to establish which have reasonable potential for development. The approach identified both assets and constraints.

It is acknowledged that certain constraints may result in a site being found unsuitable for development. However, depending on the extent and nature of the constraint, mitigation to overcome these issues may be possible. Professional judgement was used based on the information collated in the assessment above, whether on a whole the sites was suitable for development.

### 3.2.3 Availability

A site can be considered available for development, when, on the best information available there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This will often mean that the land is owned by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. The call for sites is generally an important source of information in this regard.

The following questions will be used to help determine if a site is available:

- Is there a willing land owner?
- Are there multiple owners / ransom strips?
- Is the site available now?
- Is the site likely to be available in 10 years' time?
- Are there any legal or ownership problems?

- What is preventing the site from being available and what measures could be taken to address this?

Information used in the assessment of site availability was gathered from a variety of sources, set out in Appendix C (Table 3).

A site will only be categorised as being unavailable where:

1. There is clear evidence that the landowner is not willing to see development come forward. It was not possible to confirm the willingness of landowners at this time. This will be considered further later in the LDP process.
2. There is an ongoing use which is not expected to cease within the Plan period.

Sites which include existing development have been classed as built out (and are therefore unavailable) if:

1. The development has recently been built out.
2. The development does not appear to be at the end of its life.

Sites which include existing development have *not* been classed as built out (and are therefore considered available) if:

1. There are opportunities for intensification or formalisation of current uses.
2. A planning application to change the use of the site has previously been submitted.
3. The current development is nearing the end of its life and it might be expected that it would be replaced over the Plan period.

### 3.2.4 Achievability

A site is considered achievable for development where there is reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This includes a judgement of the economic viability of a site and the capacity of the developer to complete and let or sell the development over a certain period of time. The economic viability of a site can change over the course of the plan period, therefore BCC should continue to monitor the viability of allocated sites during the plan period.

Information used in the assessment of site achievability was gathered from a variety of sources, as set out in Table 4 in Appendix C.

A site would only be categorised as being unachievable where no part of the site is considered to be deliverable within 15 years. The achievability assessment has not been subject to detailed assessment of the infrastructure (e.g. utilities) that would be required to unlock and service the development. The assessment has been based on high level constraints where data is available.

Section 5.6.3 outlines some of the work being undertaken by BCC and other Government Departments to ensure the future growth of Belfast can be accommodated. It will be important for the LDP to take account of the timing and phasing of strategic infrastructure projects which may be required.

### 3.2.5 Suitable uses

Sites will be considered suitable for housing and/or employment uses on the basis of their surrounding uses, planning permissions on the site, and any other information or professional judgement. The urban capacity has generally taken the approach set out in Table 2, however professional judgement has also been used on a site-specific basis where a new site appears to be better suited to either housing or employment use. This is in line with the ‘early pass’ nature of an Urban Capacity Study, and does not prohibit subsequent LDP policy or planning application superseding this.

Figure 2: Suitability assessment

Source	Character Area	Suitable for
Housing Monitor	All	Housing
New sites identified in urban capacity study	City Centre	Housing and/or employment
	All other areas (excluding existing employment locations)	Housing
New sites in existing employment locations	All	Employment
Planning granted for employment use	All	Employment

### 3.2.6 Site Yield

Calculating the approximate potential yield of a site is a key aspect of the Urban Capacity Study, helping to understand the development potential of sites. However, it should be acknowledged that this is a high-level assessment only; further consideration of net developable areas and the appropriate quantum of development should be considered in liaison with landowners etc. at later stages of the LDP making process.

Where all or most of the site is subject to an unimplemented planning permission, this was reflected in the yield.

It should be noted that yields are gross, rather than net. Where sites might be considered for more than one use or for mixed use development, the yield is the maximum – i.e., what would be delivered if the site was used for that use only. Many new sites identified in Belfast City Centre would be suitable for both housing or employment use, Section 4 presents several indicative scenarios for new sites in the City Centre, illustrating the potential yield should the sites come forward for various mix of housing and employment use.

### 3.2.7 Physical constraints

The net developable area of a site may not be the same as the total site area – in other words, there might be areas where physical constraints would make development unlikely. For the purposes of the assessment, physical constraints are taken to be:

1. Any absolute constraints on part of the site; and
2. Any other site specific physical constraints identified.

The site left after physical constraints is therefore the remainder of the site once these physical constraints have been discounted. Please note, whilst scheduled monuments / areas have been used as a physical constraint, the presence of listed assets or areas of archaeological interest have not been as they do not necessarily preclude development.

### 3.2.8 Development densities

Sites assessed to be suitable for multiple uses have been tested for each land use separately. Guidance suggests that the development potential of each identified site should be guided by the existing or emerging plan policy.

### High level density assessment

It is important to consider indicative densities which are suitable to the location of the site and in line with regional and local planning policy. This was only applied to new sites identified, as we used the approved yield for those sites with planning approval.

In order to gain an understanding of the densities of housing which have been granted planning permission in Belfast, an average density was calculated based on the data in the Housing Monitor and the character areas defined in Section 3.1.3.

Table 3: Analysis of approval planning applications by character area

Character Area	Approved application (Gross Density – dwellings per hectare)
Belfast City Centre	316
Inner City Belfast	145
Arterial Routes	147
Strategic Centres	118

Character Area	Approved application (Gross Density – dwellings per hectare)
Wider Urban Area	55
Small settlements	55

We have applied the densities set out in Table 3 for this Urban Capacity Study. Having applied a specific density, it is possible to determine a range (high and low).

## Employment

In the Belfast context, it is important to distinguish between the different types of employment use, for example offices (Class B1(a)) would have different density requirements than general industrial use (Class B3).

An analysis of several recently approved and pending office developments within the City Centre was undertaken to establish an average gross density. This analysis estimated that the average gross density of office development in the City Centre is approximately 39,607m<sup>2</sup> per hectare.

For new sites in existing employment locations a floor area ratio of 40% has been used as a high-level indicator across all employment sites.

Where information was available on the approved / or proposed densities for specific development this has been used. For large mixed-use sites, we have also made use of information publicly available through, for example, the pre-application consultation process.

## 3.3 Stage 3: Windfall Housing Allowance

### 3.3.1 Policy background

Guidance on the treatment of windfall development – that is, sites which become available unexpectedly and are therefore not identified as available in the plan-making process – is provided in the SPPS:

#### **Allowance for windfall housing (SPPS, p72)**

Windfall potential is central to the assessment of future housing land requirement and is a key element of the urban capacity study. Windfall potential arising from previously developed land within the urban footprint can be a key source of housing supply over the course of the plan period. In line with the objectives of the RDS it is necessary to make full allowance for this when deciding the number of sites to identify for development in the plan to prevent excessive allocation of housing land. The scale of the windfall housing allowance will vary from area to area and may depend on the approach taken to the urban capacity study. Allowance can be made on the basis of examining past trends in windfalls coming forward for development and estimating likely future windfall potential. It is recognised that there are a range of methodologies for calculating windfall. The methodology used should be robust and care should be taken to avoid under-estimation of windfalls. Windfall should be regularly monitored

because of its dynamic and changing nature, with monitoring data factored into the plans housing allocation when the LDP is reviewed.

### 3.3.2 Approach

Windfall sites can be of any size. This Urban Capacity Study classifies sites yielding less than 5 units as windfall. This is lower than the recommended figure in both PPS12 and the UK Guidance for HELAA's which is 10 units or 0.25 ha. Due to the context of Belfast and the importance of smaller sites which have the ability to make a significant contribution to the urban capacity, it was considered that 5 units was an appropriate threshold.

In order to assess whether windfall development is expected to continue to provide a reliable source of supply, the following approach has been recommended in the UK guidance:

1. The historic annual number of houses delivered on small windfall sites should be analysed.
2. Existing and proposed housing-related policies should be reviewed to ascertain whether the historic trend might be supported or curtailed by the changing policy framework.

Any additional evidence on the likelihood of sites to come forward as windfall development should be taken into account.

It should be noted that larger windfall sites (i.e. unexpectedly available sites with the capacity to deliver more than 5 dwellings) have not been included in this calculation. It is possible that such sites may contribute to housing land over the Plan period, however, as these sites are less likely to provide a reliable and consistent source of supply across each year of the Plan period, they have not been considered as part of the evidence for the justification for any windfall allowance.

## 3.4 Stage 4: Assessment Review

Following the site assessments, the development potential of all sites was collated to produce an indicative trajectory, helping to review the assessment. The methodology used to produce the indicative trajectory is provided below.

### 3.4.1 Housing trajectory

UK Guidance suggests that, once sites have been assessed, the development potential of all sites should be collated in order to produce an indicative trajectory. The trajectory sets out how much development can be provided and at what point over the Plan period. The trajectory helps to consider whether enough deliverable and developable sites have been identified to meet need in the district.

This section will present the indicative housing delivery trajectory up to 2035 (the end of the Plan period), based on all the sites considered to be deliverable and developable and on general assumptions. It should be acknowledged that this does

not set out a detailed annual trajectory, and (by virtue of the stage of the plan making process) does not take into account policy considerations. For this reason, the trajectory should be viewed as indicative only.

### 3.4.1.1 Approach

Information on suitability, availability, achievability and constraints was used alongside professional judgement to assess the timescale within which the sites with development potential are capable of development – the method for assessing phasing is set out in below. Sites are categorised into the following time periods:

1. 2017-2020 (pre-plan period)
2. 0-5 years (2020-2025) ('deliverable'<sup>10</sup>)
3. 6-10 years (2026-2030) ('developable'<sup>11</sup>)
4. 11-15 years (2031-2035) ('developable')
5. Beyond 2035

An allowance for windfall development, if deemed to be justified (see Section 5).

### 3.4.1.2 Phasing assumptions

For the majority of the sites, the following assumptions in relation to phasing have been made (see Table 4 and Table 5). These are based on professional judgement as well as historic lead in times and build out rates in the district. Committed housing sites currently under construction and those with current planning consents for new build housing are more likely to come forward in the short term.

Table 4: Lead-in times

Planning permission	Fewer than 50 units	50 units and above
Reserved matters / full planning permission	1 year	2 years
Outline planning permission	1.5 years	2.5 years
Sites without planning permission	2 years	3 years
Justification:		
<ol style="list-style-type: none"> <li>1. Lead in times likely to be influenced by planning status – the more advanced through the planning system, the less time required to start on site.</li> </ol>		

<sup>10</sup> To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

<sup>11</sup> To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

2. Lead in times likely to be influenced by quantum of development – larger schemes are likely to take longer to negotiate Agreements and discharge pre-commencement conditions.
3. Development finance is likely to take longer to access for larger schemes.

Table 5: Build out rates (residential)

Site yield	Annual build out rate
Up to 25	10
26-50	15
51-100	20
101-200	30
Over 200	55
Justification:	
<ol style="list-style-type: none"> <li>1. Larger sites likely to release more houses to the market in any given year.</li> <li>2. Very large sites (over 200 units) likely to have more than one developer involved, further increasing build out rates (for example Titanic Quarter)</li> </ol>	

### 3.4.1.3 Insufficient supply

If there remains an insufficient supply of land suitable for the development needs of the Council following the assessment of Type 1 and 2 sites, then Type 3 and 4 should be considered.

## 3.5 Stage 5 Report

The final evidence base will be made up of an assessment of each site based on the factors set out above and an overview of the main findings of the assessment.

The final report includes the following:

1. A database of all sites considered, cross referenced to their locations on maps;
2. An assessment of each site or broad location, in terms of suitability for development, availability, and achievability;
3. A high-level conclusion on the sites viability and time-frame for development;
4. A list of those sites which have been excluded from assessment and why;
5. Identification of constraints and how and when they might be overcome;
6. A conclusion as to the most appropriate use for the site;
7. An indicative trajectory of anticipated development; and
8. Any other information relevant to the process and implications / recommendations for the LDP.

## 4 Housing and Employment Land Availability

### 4.1 Type 1 – Committed Sites

#### Housing

In total **630 Housing Monitor** sites were included in the Urban Capacity Study. This excludes sites which were yielding less than 5 residential units. **13** of these sites were found to sit either fully or partly outside the current urban footprint (see Appendix D). These sites have a capacity of approximately **2,113 housing units**, the majority of which are likely to be detached or semi-detached dwellings.

**570 sites** within the urban footprint were deemed to be retained following ‘absolute constraints’ and the assessment of suitability, availability and achievability. The main justification for Housing Monitor sites being removed was evidence that the sites were coming forward for an alternative use. This was particularly relevant in the City Centre. It is important to note that not all Housing Monitor sites were reviewed. The study focused on the City Centre sites where there was a greater possibility of the sites being implemented for an alternative use. Of the 570 sites retained in the assessment, an indicative gross housing yield of around **18,998 housing units** was found. Not all of these sites might be expected to be built out within the 15 years LDP period – see Chapter 6 for the indicative trajectory.

Table 6 provide a breakdown of committed sites by character area.

Table 6: Breakdown of committed sites by character area.

Character Area	No of sites	Yield
City Centre	71	5,280
Titanic Quarter	1	2,637
Arterial Routes	142	2,807
Inner City	115	2,008
Strategic Centre	39	1,269
Wider City	202	4,997
<b>TOTAL</b>	<b>570</b>	<b>18,998</b>

A high-level analysis of the type of housing likely to come forward from committed sites was carried out using data from the Housing Monitor and relates to the proposal descriptions on planning applications (see Table 7), based on the primary house type. Many development sites will provide a mix of housing types. Approximately 77% of committed housing units are likely to be apartments / flats. Approximately 14.5% are likely to be either detached or semi-detached.

Table 7: High level assessment of housing type (committed sites)

Type of housing	No of units	Estimated %
Apartment / Flat	14,607	77
Semi-detached	2,759	14.5
Detached	329	1.7
Terraced	468	2.5
Bungalow	10	0.1
Townhouse	825	4.3
<b>TOTAL</b>	<b>18,998</b>	<b>100%</b>

## Employment

**32 sites** were identified as having existing planning permission for employment uses (mainly office space) within the City Centre, yielding approximately **203,482m<sup>2</sup>** gross employment floorspace. Titanic Quarter has the potential to accommodate a further **100,000m<sup>2</sup>**<sup>12</sup>

## 4.2 Type 2 - New sites

### All areas (excluding existing employment locations)

268 sites were identified within the urban footprint. 217 sites were retained after absolute constraints and the assessment of suitability, availability and achievability was undertaken.

#### Sites remaining following the absolute constraints and the assessment of suitability, availability and achievability.

- **118 sites** were suitable for housing with an indicative yield of **4,618 gross housing units**.
- **16 sites** were deemed suitable for employment use with an indicative yield of approximately **437,000m<sup>2</sup>** gross employment floorspace.
- **83 sites** were suitable for either housing or employment of a mix of both. These would provide an indicative yield of **5,068 housing units** or **742,681m<sup>2</sup> gross employment floorspace**. The vast majority of these sites are located within the City Centre, therefore it is likely that the type of development would be either apartments or Class B1a Office.
- A limited number of new sites outside the City Centre were identified as suitable for both housing and employment. Generally, these take account of mixed use sites such as Crumlin Road Gaol.

A high-level analysis of the type of housing likely to come forward from new sites based on the likely primary house type. Many development sites will provide a mix of housing types.

<sup>12</sup> Titanic Quarter Masterplan

Table 8: Breakdown of new sites by character area - Housing Only

Character Area	No of sites	Yield
City Centre	10	431
Titanic Quarter	-	-
Arterial Routes	31	1034
Inner City	19	994
Strategic Centre	3	64
Wider City	55	2095
<b>Total</b>	<b>118</b>	<b>4,618</b>

Table 9: Breakdown of new sites by character area - Housing &amp; Employment

Character Area	No of sites	Housing Yield	Employment Yield
City Centre	80	4538	595,741
Titanic Quarter	-	-	-
Arterial Routes	1	110	29,705
Inner City	1	372	101,393
Strategic Centre	1	48	15842
Wider City		-	-
<b>Total</b>	<b>83</b>	<b>5,068</b>	<b>742,681</b>

Table 10: High level assessment of housing type (new sites)

Housing type	No of units	Estimated %
Apartments	6980	72%
Semi-detached	1436	15%
Detached	100	1%
Terraced	1000	10%
Townhouse	170	2%
Bungalow	0	-
<b>TOTAL</b>	<b>9,686<sup>13</sup></b>	<b>100%</b>

### 4.3 New sites within existing employment locations

**44 sites** were identified within existing employment locations (as designated by draft BMAP). This includes Belfast Harbour major employment location producing an indicative yield of **421,819m<sup>2</sup>** gross employment space. 2 of these

<sup>13</sup> Indicative and includes all sites suitable for either housing or employment – for the purposes of estimated % of each type.

sites sit outside the current urban footprint, however the relevance of the urban footprint relates specifically to future housing development.

Several sites have been noted as potentially suitable for housing, although these have not been included in the indicative capacity study, as the emerging Policy context (VE3) aims to protect areas of existing employment against competing uses:

- Site 3689 - Lands at the York Street Interchange – 122 units indicative yield
- Site 3718 - Montgomery Road Business Park – 16 units indicative yield
- Site 3820 - Lanark Way Business Park – 101 units indicative yield

It should be noted that several of the existing employment designations extend outside of the current urban footprint used for this study.

## 4.4 Summary

It should be noted that the yields outlined above are gross, rather than net; some of the sites have existing development which could be redeveloped or intensified. Where sites might be considered for more than one use or for mixed use development, the yield is the maximum – i.e., what would be delivered if the site was used for that use only.

Some sites were assessed to have physical constraints, e.g. presence of ecological designations or scheduled ancient monuments. These limitations have been factored into the indicative yields for these sites. Other factors (such as areas of archaeological interest, listed assets on site, or areas of ground contamination or instability) have been flagged in the assessment but do not automatically make a site unsuitable or reduce the yield because there could conceivably be ways to overcome these constraints.

Existing planning designations have been flagged in the assessment however these would need to be considered further as part of site selection later in the LDP process as well as any potential future planning applications. Sites deemed to be ‘unavailable’ for development, was largely due to the fact that they had already been built out or currently being developed for an alternative use. There are many sites where land ownership is currently unknown, or where it has not been possible to confirm the current willingness of the landowner to see development. These have still been included in the assessment but their availability has been flagged as ‘unknown’. BCC should take reasonable steps to ensure that sites allocated for housing in the LDP are ‘available’ and that data on landowner ‘willingness’ remains robust and up-to-date.

Not all sites would be expected to be able to deliver their entire development capacity within 15 years. 2 sites were assessed to still be delivering at the end of the 18-year period (including the LDP lead in time), for example Titanic Quarter which has the remaining potential of over 2500 units.

A summary of the assessment is provided in Table 11. Further details of the individual site assessments are provided in Appendix F and Appendix G. Housing capacity ranges from an indicative yield of **23,616** gross residential units should

only those deemed suitable for housing be developed to **28,684** should all those sites suitable for both housing and employment come forward for housing.

Approximately **1.16 million m<sup>2</sup>** gross employment floorspace is available from committed employment sites and new sites identified. This increases to an indicative capacity of approximately **1.9 million m<sup>2</sup>** should all those sites suitable for either employment or housing come forward for employment uses.

Table 11: Summary

	Housing (units)					Employment (sq m)					
	Committed Sites <sup>(A)</sup>	New Sites		Total		Committed Sites <sup>(D)</sup>	Sites in existing employment locations <sup>(E)</sup>	New Sites		Total	
		Housing Sites <sup>(B)</sup>	Housing / Employment Sites <sup>(C)</sup>	Just Housing Sites <sup>(A+B)</sup>	All (100% Housing) <sup>(A+B+C)</sup>			Employment Sites <sup>(F)</sup>	Housing/ Employment Sites <sup>(G)</sup>	Just Employment Sites <sup>(D+E+F)</sup>	All (100% Employment) <sup>(D+E+F+G)</sup>
<b>City Centre</b>	5,280	431	4,538	<b>5,711</b>	<b>10,249</b>	203,482		146,366	595,741	<b>349,848</b>	<b>945,589</b>
<b>Titanic Quarter</b>	2,637			<b>2,637</b>	<b>2,637</b>	100,000				<b>100,000</b>	<b>100,000</b>
<b>Inner City</b>	2,008	994	372	<b>3,002</b>	<b>3,374</b>		10,946		101,393	<b>10,946</b>	<b>112,339</b>
<b>Wider City</b>	4,997	2,095	48	<b>7,092</b>	<b>7,140</b>		326,601	278,765		<b>605,366</b>	<b>605,366</b>
<b>Arterial routes</b>	2,807	1,034	110	<b>3,841</b>	<b>3,951</b>		82,301		29,705	<b>82,301</b>	<b>112,006</b>
<b>Strategic centres</b>	1,269	64	0	<b>1,333</b>	<b>1,333</b>		7,383	11,882	15,842	<b>19,265</b>	<b>35,107</b>
<b>Whole City</b>	<b>18,998</b>	<b>4,618</b>	<b>5,068</b>	<b>23,616</b>	<b>28,684</b>	<b>303,482</b>	<b>421,819</b>	<b>437,013</b>	<b>742,681</b>	<b>1,162,314</b>	<b>1,904,995</b>

## 5 Windfall

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### 5.1 Policy background

The SPPS highlights that *‘windfall potential is central to the assessment of future housing land requirement and is a key element of the urban capacity study’*. *Windfall potential arising from previously developed land within the urban footprint can be a key source of housing supply over the course of the plan period’<sup>14</sup>*.

The SPPS goes on to note that a ‘full allowance’ should be made when deciding the number of sites to identify for development in the plan to prevent excessive allocation of housing land.

Allowance can be made on the basis of examining past trends in windfalls coming forward for development and estimating likely future windfall potential. It is recognised that there are a range of methodologies for calculating windfall. The methodology used should be robust and care should be taken to avoid under-estimation of windfalls.

### 5.2 Approach

Windfalls sites can be of any size. This Urban Capacity Study uses a minimum threshold of 5 units. Small windfall sites are therefore those which fall below this threshold, and so have not been included in the urban capacity study trajectory. In order to assess whether small sites windfall development is expected to continue to provide a reliable source of supply, the following approach has been used:

- The historic annual number of houses delivered on small windfall sites should be analysed.
- Existing and proposed housing-related policies should be reviewed to ascertain whether the historic trend might be supported or curtailed by the changing policy framework.
- Any additional evidence on the likelihood of sites to come forward as windfall development should be taken into account.

It should be noted that larger windfall sites (i.e. unexpectedly available sites with the capacity to deliver more than five dwellings) have not been included in this calculation. It is possible that such sites may contribute to housing land over the Plan period. However, as these sites are less likely to provide an ‘available supply’ across each year of the Plan period, they have not been considered as part of the evidence for the justification for any windfall allowance.

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<sup>14</sup> SPPS, p72

### 5.3 Historic windfall delivery

An historical analysis of windfall using Housing Monitor Data is shown in Table 12. Over a similar period to the new LDP (15 years from 2000-2015), small windfall sites (yielding less than 5 units or 0.1ha) produced **1,403 housing units with an average of 94 units per annum.**

Sites above this threshold on ‘unzoned land’ provided a significant contribution of **18,662 housing units** with an average of **1,244 units per annum.**

It is also important to note that there was approximately 1,331 units identified within the Housing Monitor which were excluded from the capacity figures as the sites yielded less than 5 units, therefore would be considered as potential windfall.

	ALL SITES		< 5 units or 0.1ha			Zoned Sites		Unzoned Sites > 5 units or 0.1ha		
	Area Developed (Ha)	Units Complete	Area Developed (Ha)	Units Complete		Area Developed (Ha)	Units Complete	Area Developed (Ha)	Units Complete	
				No.	%				No.	%
2000/01	36.28	1,652	1.65	124	7.51%	4.97	158	29.66	1,370	82.93%
2001/02	41.39	1,868	1.70	102	5.46%	6.72	224	32.98	1,542	82.55%
2002/03	44.97	1,981	1.60	103	5.20%	3.38	167	39.99	1,711	86.37%
2003/04	51.37	1,939	1.58	115	5.93%	11.35	298	38.44	1,526	78.70%
2004/05	47.46	1,492	8.57	122	8.18%	3.53	101	35.36	1,269	85.05%
2005/06	49.07	2,030	1.72	135	6.65%	3.96	122	43.39	1,773	87.34%
2006/07	49.60	2,328	2.17	153	6.57%	5.01	211	42.43	1,964	84.36%
2007/08	37.87	2,397	2.26	197	8.22%	3.05	135	32.56	2,065	86.15%
2008/09	28.89	1,922	1.52	139	7.23%	2.48	35	24.89	1,748	90.95%
2009/10	22.17	1,534	0.91	75	4.89%	0.88	45	20.38	1,414	92.18%
2010/11	7.16	348	0.27	10	2.87%	0.61	14	6.28	324	93.10%
2011/12	10.83	453	0.42	30	6.62%	0.40	24	10.01	399	88.08%
2012/13	16.38	673	0.62	46	6.84%	0.40	12	15.36	615	91.38%
2013/14	18.82	695	0.64	25	3.60%	0.91	35	17.27	635	91.37%
2014/15	6.48	390	0.65	27	6.92%	1.25	56	4.58	307	78.72%
<b>HIGHEST</b>	<b>51.37</b>	<b>2,397</b>	<b>8.57</b>	<b>197</b>	<b>8.22%</b>	<b>11.35</b>	<b>298</b>	<b>43.39</b>	<b>2,065</b>	<b>93.10%</b>
<b>LOWEST</b>	<b>6.48</b>	<b>348</b>	<b>0.27</b>	<b>10</b>	<b>2.87%</b>	<b>0.40</b>	<b>12</b>	<b>4.58</b>	<b>307</b>	<b>78.70%</b>
<b>AVERAGE</b>	<b>31.25</b>	<b>1,447</b>	<b>1.75</b>	<b>94</b>	<b>6.18%</b>	<b>3.26</b>	<b>109</b>	<b>26.24</b>	<b>1,244</b>	<b>86.62%</b>

## 5.4 Likely future trends

The purpose of this review is to understand whether the emerging policy framework is either:

- more restrictive of windfall development (therefore a lower rate of delivery might be expected); or
- more supportive of windfall development (therefore a higher rate of delivery might be expected).

### 5.4.1 Draft Belfast Metropolitan Area Plan

The BMA Housing Strategy aims to:

- accommodate delivery of a level of housing growth in accordance with the RDS direction on managing housing growth and distribution;
- achieve revitalised and compact urban areas by accommodating as much housing as possible within existing urban footprints;
- secure higher density development within urban areas while protecting the quality of the urban environment, particularly the character, amenity and environmental quality of established residential areas;
- where necessary, identify locations for urban extensions elsewhere, avoiding significant environmental constraints, achieving compact urban forms and respecting well defined physical boundaries;
- create the development of balanced local communities and provide housing choice by achieving a mix of tenures and meeting identified needs for social housing;
- support the network of service centres based on towns, villages and small settlements in the Metropolitan Rural Area; and

### 5.4.2 Local Development Plan 2020-2035 - Preferred Options Paper (January 2017)

The Preferred Options Paper published in January 2017 provides some insight in to the potential future policy for housing. Policy LP1 states that *'the LDP will allocate sufficient land to accommodate 37,000 new housing units during the plan period'*. To achieve this the following will be prioritised:

- Increasing the density of housing development across the city of Belfast, focusing the highest density of development on the city centre and other locations which benefit from high accessibility to public transport facilities;
- Prioritising the re-use of previously developed land by setting an appropriate target for housing development on 'brownfield' land and encouraging the re-development of appropriate locations to contribute to urban regeneration;

- Concentrating growth within the existing settlement limits of the Belfast urban area;
- Identifying opportunities for developments on the edge of settlements, but avoid any developments in areas that could lead to the coalescence of our small settlements into the larger urban area; and
- Restricting housing development in the open countryside.

## 5.5 Summary

The main differences between the existing and emerging policies which may impact on windfall delivery are:

3. Draft BMAP contained a substantial quantum of ‘whiteland’ i.e. un zoned land, which may have led to an historically high windfall figure for larger sites;
4. The housing strategy in draft BMAP was linked to the envisaged housing growth in the RDS (Housing Growth Indicators). The emerging LDP seeks to accommodate a growth aspiration of 26,430 new housing units during the plan period (2020-2035) plus any shortfall in the period prior to 2020, therefore is likely that a much more proactive approach will be taken to the zoning of land for housing and key site requirements for mixed use sites.

Whilst it is too early to draw robust conclusions on the how emerging policy context will impact on future windfall, both of the factors above suggest that the high level of windfall sites of 5 or more units is unlikely to continue under the new policy approach. The approach taken to the zoning of sites will therefore be critical. The urban capacity study should be reviewed following the Plan Strategy stage and at regular stages during plan implementation.

As the Local Plan progresses, the Council should continue to assess the impact that its policies might have on the delivery of windfall sites, and whether this impact should be reflected in any windfall assumptions.

## 5.6 Assessment Review

### 5.6.1 Housing trajectory

#### 5.6.1.1 Overview

UK Guidance suggests that, once sites have been assessed, the development potential of all sites should be collated in order to produce an indicative trajectory. The trajectory sets out how much development can be provided and at what point over the Plan period. The trajectory helps to consider whether enough deliverable and developable sites have been identified to meet need in the district. The actual delivery of housing will be influenced by market demand and other factors.

This section presents the *indicative* housing delivery trajectory up to 2035 (the end of the Plan period), based on all the sites considered to be deliverable and developable and on general assumptions. It should be acknowledged that this does not set out a detailed annual trajectory, and (by virtue of the stage of the plan making process) does not take into account policy considerations. For this reason, the trajectory should be viewed as indicative only.

Section 4.8 sets out the methodology used to determine the indicative trajectory. Indicative trajectory

Using the approach set out in Section 4.8, the indicative trajectory is set out in Table 13.

Table 13: Indicative trajectory

	Committed sites	New sites (Housing only)	New sites (suitable for housing and employment)	Windfall from small housing sites (< 5 units) – ave 94 per annum <sup>15</sup>	Total
2017-2020	2,174	200	64	282	2,720
2020-2025	12,276	4,236	4,135	470	21,117
2026-2030	1,113	182	869	470	2,634
2030-2035	3,435	-		470	3,905
<b>TOTAL</b>	<b>18,998</b>	<b>4618</b>	<b>5068</b>	<b>1692</b>	<b>30,376</b>

The trajectory illustrates that there is likely to be sufficient housing sites available to satisfy the estimated growth of Belfast over the plan period. Based on the average annual requirement of approximately 1,762 units, the 5-year requirement would be 8,810 units. Committed housing sites are likely to satisfy the 5 years housing supply.

<sup>15</sup> Excludes larger windfall sites yielding >5 units.

## 5.6.2 Assessment review

Table 14 compares the indicative yield against the objectively assessed needs for housing and employment floorspace.

Table 14: Assessment Review

Land Use	Need or HGI (2020-2035)	Emerging LDP requirement (2020-2035)	Indicative yield over plan period 2020-2035		Windfall (sites < 5 units)
			Housing only / employment only sites	Mixed use or suitable for either uses	
Housing	17,050	26,430 units (Policy LP1)	21,242 housing units <sup>16</sup> (excludes units delivered pre-plan period, est 2,374)	<i>Up to 26,246.</i>	1,410
Employment	-	480,000 m <sup>2</sup> (Policy VE1)	1,064,314 m <sup>2</sup> (excludes floorspace delivered pre-plan period, est 98,000m <sup>2</sup> )	<i>Up to 1,806,995m<sup>2</sup></i>	-

UK Guidance states that, if insufficient sites have been identified against objectively assessed needs, plan makers should revisit the assessment and/or investigate how this shortfall should be best planned for. Table 14 indicates that the required growth in Belfast cannot be accommodated entirely within the urban footprint. 60% of the estimated future housing growth would indicate that 15,858 units should be located within the urban footprint to meet the RDS requirement. This can be achieved in Belfast, however it will be important to encourage residential development within the City Centre on those sites which have been deemed to be suitable for both housing and/or employment use.

There is well in excess of the land required for future employment land. It is recommended that BCC review the capacity figures in conjunction with the estimated growth in particular types of employment space to ensure that suitable sites are allocated for the various types of Class B use. Given the excess of potential employment space, it is also recommended that BCC review existing employment zonings with the view to provision additional housing.

These figures should be viewed in the context of the Urban Capacity Study's role as a 'policy neutral' assessment. A number of the sites judged to be suitable for development in the assessment may not meet the strategic objectives of the Council. It is the role of later stages of plan making to consider which sites should be allocated in the Local Policies Plan.

The Council should continue to monitor the trajectory, and take into account any updated information or assumptions in relation to its inputs, e.g. completions, housing land supply and the windfall allowance.

<sup>16</sup> Note: 2,113 housing units outside the current urban footprint are not included in this figure.

## 5.6.3 Infrastructure Considerations

### 5.6.3.1 Water

Capacity within the waste water treatment infrastructure has been identified as an issue in Belfast. Information provided by the Department for Infrastructure indicates that Belfast is serviced by 6 waste water treatment works (WwTW):

1. Belfast
2. Edenderry (Co. Antrim)
3. Newtownbreda
4. Whitehouse (located within Antrim & Newtownabbey Council Area)
5. Dunmurry (located within Lisburn & Castlereagh Council Area)
6. Kinnegar (located within Ards & North Down Council Area)

Table 15 presents the yield of potential future housing and employment sites within each catchment:

Table 15: Sites within each catchment area

	Committed Housing sites	New Sites – housing only	New Sites – housing and/or employment	Total
<i>Belfast WwTW</i>	16,210	3,848	5,068	<b>25,126</b>
<i>Whitehouse WwTW</i>	102	7	0	<b>109</b>
<i>Dunmurry WwTW</i>	831	149	0	<b>980</b>
<i>Edenderry Belfast WwTW</i>	0	44	0	<b>44</b>
<i>Newtownbreda WwTW</i>	99	52	0	<b>151</b>
<i>Kinnegar WwTW</i>	1,756	518	0	<b>2,274</b>
<b>TOTAL</b>	<b>18,998</b>	<b>4,618</b>	<b>5,068</b>	<b>28,684</b>

The capacity information provided by NI Water indicates that there is currently available capacity in all six WwTW. Whitehouse, Dunmurry and Kinnegar all have sufficient capacity to accommodate a further 20% growth. Newtownbreda will be reaching capacity at approximately 20% growth. Edenderry will reach full capacity somewhere between 10-20% growth. It is important to note that several of the catchments extend beyond Belfast's boundary so growth in, for example in Lisburn/Castlereagh area could also impact on capacity in Dunmurry, etc. Drawing 004 in Appendix D illustrates the relationship between the WwTW catchments and Belfast City boundary.

To permit greater than 5% growth in the Belfast WwTW catchment, significant investment would need to be made to increase the capacity during the period of the Local Development Plan (2020-2035). However even if funding is available, given the scale of the investment required and the lead in time for delivery, there may be a period in the early part of the Plan where higher growth could not be accommodated. We have estimated that there are approximately 13,500

committed residential units within Belfast WwTW catchment. On top of this there will be significant requirements from employment and other uses within Belfast City Centre which will be competing for connections to the WwTW. On this basis it is clear that investment in the Belfast WwTW must be prioritised in the short term. Infrastructure planning and investment must run in tandem with the LDP process to ensure that predicted growth can be achieved.

### **Living with water programme – Strategic Drainage Infrastructure Plan**

Frequent and often serious flood events in recent years, exacerbated by the effects of climate change, have highlighted the increasing pressure on sewerage infrastructure in towns and cities across Northern Ireland.

Critically, the sewerage network and associated treatment works in Belfast is nearing capacity. NI Water may therefore have to refuse new connections if alternative measures are not implemented. This poses a serious threat to future development in Belfast, and consequently could hinder economic growth.

Additionally, these flood events and frequent spilling of dirty water into watercourses has led to environmental concern, particularly in protected waters, which could result in infraction proceedings due to non-compliance with environmental legislation.

The Living With Water Programme (LWWP) was established to develop a Strategic Drainage Infrastructure Plan (SDIP) for Belfast, the key themes of which are to protect against flood risk, enhance the environment, and support economic growth. The LWWP, led by Department for Infrastructure (DfI) is a long-term, strategic and integrated approach to managing the flow of water through Belfast, developing sustainable solutions to enable the City to grow and thrive in future.

### **5.6.3.2 Transport**

The DfI is currently progressing the Belfast Metropolitan Area Transport Study process by developing the Belfast Metropolitan Transport Strategy (BMTS) in conjunction with the Local Development Plan Draft Strategies being prepared by the Councils within the Belfast Metropolitan Area. These Councils are:

- Belfast City Council
- Lisburn and Castlereagh City Council
- Antrim and Newtownabbey Borough Council
- Ards and North Down Borough Council
- Mid and East Antrim Borough Council

It is expected that the Belfast Metropolitan Area Transport Plan will be initiated following the completion of the BMTS and in conjunction with the respective Local Policies Plans.

The BMTS and BMTTP will complement the Local Development Plan Strategy and Policies Plan in each respective area within the BMA.

This Transport Study is likely to test a number of illustrative transport measures and in turn to compile and test a range of comprehensive illustrative transport networks, each of which represent potential strategic directions for transport investment for the Department. This will also assess the transport impacts of alternative potential land-use development scenarios. The aim of the Transport Study is to explore how land-use planning and transport planning might be best integrated to achieve the DfI's and the Councils' objectives.

It is important that the BMTS takes account of envisaged growth across the BMA and major proposed changes in housing / population and in employment / services to year 2035.

There are several potential transport interventions which may impact on Belfast during the course of the Plan period:

1. Strategic Highways (for example, York Street Interchange, Radial capacity enhancements)
2. Non-strategic highway improvements (for example Inner Ring Road, Connsbank Link)
3. Intelligent Transport Systems (Upgraded Urban Traffic Control System)
4. Rail (for example Belfast Transport Hub, Gamble Street Rail Halt)
5. Goldline (frequencies to/from Belfast)
6. Belfast Rapid Transit (Phase 1 and Phase 2)
7. Metro (current / proposed frequencies)
8. Cycling – improvements to the cycling network
9. Walking – improvements to the walking network
10. Demand Management – (for example City Centre Controlled Parking Zone, Parking Restraint, Residents' Parking Schemes, Park and Ride)

It is important that the emerging LDP is informed by the BMTS and vice versa. It will be crucial that the interventions above are delivered to ensure that the Belfast City can accommodate the growth envisaged. Strategic infrastructure such as Belfast Rapid Transit will be crucial to encouraging a modal shift away from the private car towards public transport. Belfast Rapid Transit will be important to the delivery of strategic sites such as Titanic Quarter. Growth in city centre living and working will require complementary and robust policies to manage demand such as controlled parking and park and ride facilities.

## 6 Conclusions and Recommendations

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The findings of the Urban Capacity Study will be used, alongside other evidence base documents, to inform the production of the Plan Strategy. In particular, the Urban Capacity Study will be used to inform development options for further consideration. It is important to note that the classification of a site as suitable, available and achievable in this assessment does not constitute an allocation in the LDP.

To summarise, this Urban Capacity Study has indicated that there is sufficient supply of employment land for the LDP period.

To meet the housing requirements over the plan period it will be important to encourage residential development within the City Centre on those sites which are deemed to be suitable for housing or employment. The RDS requirement to locate 60% of future housing within the urban footprint can be achieved.

The Council should continue to regularly update the Urban Capacity Study and indicative trajectory as new sites are put forward and updated information becomes available.

### **Recommendations:**

1. Both the RDS and SPPS emphasise the need to there to be an ‘adequate and available’ supply of quality housing and employment land. A call for sites exercise is often used as a mechanism of confirming whether sites are ‘available’. This was not carried out to inform this Urban Capacity Study, therefore there was limited evidence to support the assessment of ‘availability’. BCC should consider using a call for sites or similar method for establishing the availability of sites later in the site allocation process.
2. This report presents the urban capacity findings for Type 1 (committed sites) and Type 2 (new sites). We recommend that Belfast City Council review the findings and consider whether further assessment is required to include Type 3 and Type 4.
3. Achievability – Most sites have been assessed to be achievable within the LDP period, even though there are many sites located within areas of high deprivation, where traditionally social housing is the primary source of new housing. The economic viability of a site can change over the course of the plan period; therefore, BCC should continue to monitor the viability of allocated sites during the plan period. Achievability is also based on physical infrastructural constraints, which is particularly important in Belfast. It will be important to further consider infrastructural constraints when allocating sites in the LDP and align the LDP with emerging infrastructure strategies such as the Living with Water Programme and Belfast Metropolitan Transport Strategy.
4. Windfall – As the Local Plan progresses, the Council should continue to assess the impact that its policies might have on the delivery of windfall sites, and whether this impact should be reflected in any windfall assumptions. The Urban Capacity Study has not included an estimate of windfall for larger sites yielding 5 or more units.

5. The approach taken to the zoning of sites is critical. Achieving the appropriate mix of residential and employment use on mixed use sites in the City Centre is particularly important. This can be achieved through key site requirements.
6. The Urban Capacity Study indicates that the required growth in Belfast cannot be accommodated entirely within the urban footprint. 60% of the estimated future housing growth would indicate that 15,858 units should be located within the urban footprint to meet the RDS requirement. This can be achieved in Belfast, however it will be important to encourage residential development within the City Centre on those sites which have been deemed to be suitable for both housing and/or employment use.
7. Those committed housing sites outside the current urban footprint will be required to meet the growth aspirations over the plan period.
8. There is well in excess of the land required for future employment land. It is recommended that BCC review the capacity figures in conjunction with the estimated growth in particular types of employment space to ensure that suitable sites are allocated for the various types of Class B use. Given the excess of potential employment space, it is also recommended that BCC review existing employment zonings with the view to provision of additional housing.

## Appendix A – Planning Policy Context

### A1 Regional Development Strategy (RDS) 2035

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The RDS 2035 prepared by the former Department for Regional Development (published 15<sup>th</sup> March 2012) is the spatial strategy for NI and provides an overarching strategic planning framework to facilitate and guide the public and private sectors. The RDS was prepared under the Strategic Planning (Northern Ireland) Order 1999. The RDS acknowledges that housing is a key driver of physical, economic and social change and emphasises the importance of the relationship between the location of housing, jobs, facilities, services and infrastructure and must be taken into account when preparing a local development plan.

The RDS introduced the “Plan, Monitor and Manage” approach to providing housing requirements which seeks to ensure that plans become more sustainable, balanced and integrated. The RDS provides strategic guidance through Regional Guidance (RG) and Spatial Framework Guidance (SFG) under the 3 sustainable development themes of the Economy, Society and Environment.

**RG1: Ensure adequate supply of land to facilitate sustainable economic growth** to ensure that Northern Ireland is well placed to accommodate growth in jobs and businesses there should be an adequate and available supply of employment land.

Sustainable communities are places where people want to live, work and play, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment and contribute to a high quality of life. They are safe and inclusive, well planned, built and offer equality of opportunity and good services for all. The guidance set out below supports the aims of ‘A Shared Future’ published by the office of the First Minister and Deputy First Minister in March 2005 and recognises the need to:

- **RG6 Strengthen community cohesion** by developing integrated services and facilitates, fostering a stronger community spirit and sense of place and encouraging mixed housing development;
- **RG7 Support urban and rural renaissance** by developing innovative ways to bring forward under-utilised land and buildings, particularly for mixed use development, promoting regeneration in areas of social need, ensuring that environmental quality in urban areas of social need, is improved and maintained with adequate provisions of green infrastructure, and reducing noise pollution.
- **RG8 Manage housing growth** to achieve sustainable patterns of residential development by promoting more sustainable development within existing urban areas and ensuring an adequate and available supply of quality housing to meet the needs of everyone and using a broad evaluation framework to assist judgements on the allocation of housing growth. It is recognised that

there are significant opportunities for new housing on appropriate vacant and under-utilised land, particularly as part of mixed use developments.

The RDS seeks to promote more sustainable housing development within existing urban areas by encouraging compact urban forms. Housing land will be identified in Development Plans to ensure an adequate and available supply of quality housing to meet the needs of everyone taking account of existing vacant housing and need identified in the Housing Needs Assessment/ Housing Market Analysis (this includes land for social and intermediate housing such as shared ownership and affordable housing).

The RDS recognises that there are significant opportunities for new housing on appropriate vacant and underutilised land, and sets a regional target of 60% of new housing to be located in appropriate ‘brownfield’ sites within the urban footprints of settlements greater than 5,000 population.

## A1.1 Regional Strategic Objectives

The regional strategic objectives for housing in settlements, consistent with regional guidance in the RDS, are to:

- manage housing growth to achieve sustainable patterns of residential development;
- support urban and rural renaissance; and
- strengthen community cohesion.

## A1.2 Spatial Framework Guidance (RDS 2035)

The RDS Spatial Framework consists of 5 key components including the Metropolitan Urban Area (BMUA) centred on Belfast. The BMUA is the major conurbation in Northern Ireland with a thriving retail service, administration, cultural and educational centre in the City of Belfast. It is the Region’s largest employment centre. In 2008, it had a population of 268,000 which had been in decline. A sustained approach to regeneration has changed the city centre and brought dramatic improvements. The last decade has seen significant economic growth and around 26,000 jobs have been created in the Belfast City Council area. The evidence indicates however that over 50% of those who work in Belfast live outside of the City.

### **SFG1: Promote urban economic development at key locations throughout the BMUA and ensure sufficient land is available for jobs**

- **Identify and protect key locations for economic growth.** This will strengthen the role of the BMUA as the regional economic driver. Major employment/industrial locations in Belfast Harbour Area, (including Titanic Quarter), West Lisburn/Blaris, Purdysburn. and Global Point/Ballyhenry being connected to public transport will support the drive to provide a range of opportunities for job creation.

- **Direct mixed-use development towards sites which will enhance local regeneration initiatives.** Regeneration of sites such as Titanic Quarter, Crumlin Road Gaol, the North Foreshore, and Belfast Harbour area will act as catalysts for regeneration. The Port of Belfast occupies approximately 19% of the City Council area. It is already a key centre for industry and trade. This role will grow further as the residential, commercial and leisure potential of the Titanic Quarter lands are realised.

### **SFG2: Grow the population of the City of Belfast**

The RDS notes that the population of Belfast is forecast to fall over the next two decades; therefore, population decline needs to be reversed in order to have a strong capital city which is the economic driver of Northern Ireland. The aim is for the population of Belfast City to be 300,000 by 2021 which was the level achieved in the 1980s. Key to population growth will be the provision of housing to meet the full range of need.

There are significant opportunities for more jobs to be created and it will be important to have a wide variety of house types for those wishing to live and work in the City. It is estimated that 22,000 jobs could be created between 2008 and 2028. Most of these jobs will be in the service and office sector and they will be attracted to the City by the availability of a skilled workforce and the quality of life which the City has to offer.

- **Support a drive to provide additional dwellings.** These additional dwellings will be provided on land already zoned for housing and on windfall sites which become available for development. Assessment is also needed of the scope for higher densities in appropriate locations, particularly at gateway sites into the City Centre, on arterial routes and at transport interchange areas. It will require imaginative and innovative high-quality design, including mixed use schemes, to ensure that they link into the existing urban fabric. The provision of these additional dwellings must take account of environmental capacity studies to ensure that their delivery can be sustainably managed.

### **SFG3: Enhance the role of Belfast City Centre as the regional capital and focus of administration, commerce, specialised services and cultural amenities**

Belfast City Centre will continue as the primary office location in Northern Ireland. Growth in the business and service sectors will be the main driver for new offices and while most will locate in the City Centre, some business uses assist regeneration initiatives particularly in areas of deprivation beyond the City Centre.

- **Enhance the employment potential of Belfast City Centre.** Belfast has a key role to play as the centre of regional administration and providing business services. This role will grow further as the residential, commercial and leisure potential of the Titanic Quarter lands area is realised. The international environmental importance of Belfast Lough must be taken into account when development is being considered. The City Centre will continue to be the first choice for major office developments.

## A1.3 Housing Growth Indicators (HGIs)

The RDS 2035 identifies regional housing needs through Housing Growth Indicators (HGIs) across Northern Ireland. HGIs have been produced as a guide for those preparing development plans. These figures are an estimate of the new dwelling requirement between 2012-2025 for each District Council area.

The HGIs were updated in April 2016 to reflect the new District boundaries following local government reform. These are calculated on the basis of 2012-based population projections and provide an indicator for each district between 2012-2025. It is important to note that these latest HGIs published by the Department for Infrastructure are based on the lower, 2012-based population projection, rather than the more recent 2014-based population projection data.

The latest HGI figures<sup>17</sup> suggest a growth of 13,700 units for Belfast between 2012 and 2025. This equates to 1,054 units per annum.

## A2 Strategic Planning Policy Statement (SPPS)

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The Department for Infrastructure's 'Strategic Planning Policy Statement for Northern Ireland' - Planning for Sustainable Development (SPPS), was published in final form on 22<sup>nd</sup> September 2015. This publication consolidates over twenty separate publications into one document under the reformed two-tier planning system. The provisions of the SPPS must be taken into account in the preparation of LDPs, and are also material to all decisions on individual planning applications and appeals.

The SPPS recognises that good quality housing is a fundamental human need that plays a significant role in shaping our lives and our communities. The SPPS also states that the planning system can play a positive and supporting role in the delivery of homes to meet the full range of housing needs of society, within the wider framework of sustainable development. The policy approach must be:

- to facilitate an **adequate and available** supply of quality housing to meet the needs of everyone;
- to promote more sustainable housing development within existing urban areas; and
- to provide mixed housing development with homes in a range of sizes and tenures.

This approach to housing will support the need to maximise the use of existing infrastructure and services, and the creation of more balanced sustainable communities.

In preparing LDPs councils should bring forward a strategy for housing, together with appropriate policies and proposals that must reflect the policy approach of

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<sup>17</sup> Available from: <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/2012-based-housing-growth-indicators-hgis-and-methodology-paper.pdf.pdf>

the SPSS, tailored to the specific circumstances of the plan area. Planning authorities must deliver increased housing density without town cramming, sustainable forms of development, good design and balanced communities.

The SPSS advises that planning has a role to play in helping to improve the health and well-being of people by avoiding development that will result in a deterioration in air or water quality; safeguarding and facilitating open space, sport and outdoor recreation, managing the adverse impacts of noise and nuisance by influencing the location, layout and design of new development.

The SPSS also recognises that the planning process has an important role to play in the delivery of good quality housing that supports the creation of more balanced communities. Balanced communities can contribute positively to the creation and enhancement of shared spaces and vice-versa.

## A2.1 Housing Land Allocation

The SPSS sets out the process for allocating housing land. It states that housing allocations in LDP's should be informed by:

- **RDS Housing Growth Indicators (HGIs)** – have been incorporated within the RDS as a guide to councils in preparing development plans. They provide an estimate for the new dwellings requirement for each area and provide a guide for allocating housing distribution across the plan area. The indicator covers both urban and rural housing.
- **Use of the RDS housing evaluation framework** - which takes account of the varying capacities of settlements and will assist councils in making judgements on the allocation of housing growth.
- **Allowance for existing housing commitments** – Councils should take account of dwellings already constructed, approvals not yet commenced and residential development proposals likely to be approved.
- **Urban capacity studies** – Councils should assess the potential for future housing growth **within the urban footprint** and the capacity for **different types and densities of housing**. The urban capacity study should take account of housing development opportunities arising from **previously developed land, infill sites, conversion of existing buildings, and possible changes of land use**. Consideration needs to be given to the **type of housing and density appropriate to each site** in order to assess the number of housing units likely to be generated. The urban capacity study should be published as a technical supplement to the draft plan.
- **Allowance for Windfall housing:** Windfall potential is central to the assessment of future housing land requirement and is a key element of the urban capacity study. Windfall potential arising from previously developed land within the urban footprint can be a key source of housing supply over the course of the plan period. In line with the objectives of the RDS it is necessary to make full allowance for this when deciding the number of sites to identify for development in the plan to prevent excessive allocation of housing land. The scale of the windfall housing allowance will vary from area to area and

**may depend on the approach taken to the urban capacity study.**

Allowance can be made on the basis of **examining past trends in windfalls** coming forward for development and **estimating likely future windfall potential**. It is recognised that there are a range of methodologies for calculating windfall. The methodology used should be **robust and care should be taken to avoid under-estimation of windfalls**. Windfall should be regularly monitored because of its dynamic and changing nature, with monitoring data factored into the plans housing allocation when the LDP is reviewed.

**Application of a sequential approach and identification of suitable sites for settlements of over 5,000 population.** There may be circumstances where it is appropriate to apply the sequential approach below this threshold.



- **Housing Needs Assessment / Housing Market Analysis (HNA/HMA)** – provides an evidence base that must be taken into consideration in the allocation, through the development plan, of **land required to facilitate the right mix of housing tenures including open market and special housing needs such as affordable housing, social housing, supported housing and traveller’s accommodation**. The HNA will influence how LDPs facilitate a reasonable mix and balance of housing tenures and types. The Northern Ireland Housing Executive, or the relevant housing authority, will carry out the HNA/HMA.
- **Transport Assessments** – where appropriate transport assessments should be carried out when considering certain sites for residential use to achieve increased integration with public transport and other alternatives to the private car.

Despite a requirement for a UCS in the LDP housing allocation process, the SPSS does not provide a methodology under which the UCS should be carried out.

## A3 Planning Policy Statement 7 ‘Quality Residential Environments’

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PPS7 sets out DfI’s planning policies for achieving quality in new residential development and advises on the treatment of this issue in development plans. It embodies the Government's commitment to sustainable development and the Quality Initiative. The Statement, together with the advice contained in associated Supplementary Planning Guidance documents, including Creating Places and Living Places complements existing Government policy and initiatives aimed at achieving attractive and sustainable places through better design.

## A4 Planning Policy Statement 12 ‘Housing in Settlements’

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The requirement to prepare an Urban Capacity Study is also set out in Planning Policy Statement 12 (2005). The PPS states that the UCS is needed to inform housing allocations in the LDP and assist in reaching a target set by the RDS that 60% of new housing should be located in ‘*appropriate ‘brownfield’ sites within the urban footprints of settlements greater than 5,000 population*’<sup>18</sup> (p42). Additionally, the UCS provides important base data for future assessments of housing growth indicators and targets.

Appendix 1 of PPS12 provides guidance on the preparation of Urban Capacity Studies. It highlights that Urban Capacity Studies ‘*are an essential tool in both ensuring a sequential approach to the identification of sites through the development plan process and managing the release of housing land*’.

### A4.1 Policy HS3 (Amended) – Travellers Accommodation

Travellers have distinctive needs which will be assessed as part of the local housing needs assessment undertaken by the Northern Ireland Housing Executive. Where a need is identified and a development plan is under preparation, the plan should identify a suitable site(s).

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<sup>18</sup> DfI, PPS12 ‘Housing in Settlements’

## A5 Current Policy in relation to Housing and Employment Land

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### A5.1 Belfast Metropolitan Area Plan (dBMAP)

#### A5.1.1 BMA Housing Strategy

The current Belfast Metropolitan Area Housing Strategy aims to:

- accommodate delivery of a level of housing growth in accordance with the RDS direction on managing housing growth and distribution;
- achieve revitalised and compact urban areas by accommodating as much housing as possible within existing urban footprints;
- secure higher density development within urban areas while protecting the quality of the urban environment, particularly the character, amenity and environmental quality of established residential areas;
- where necessary, identify locations for urban extensions elsewhere, avoiding significant environmental constraints, achieving compact urban forms and respecting well defined physical boundaries;
- create the development of balanced local communities and provide housing choice by achieving a mix of tenures and meeting identified needs for social housing;
- support the network of service centres based on towns, villages and small settlements in the Metropolitan Rural Area; and
- protect the rural areas surrounding the Metropolitan Urban Area from development pressures.

#### A5.1.2 BMA Employment Strategy

The BMA Employment Strategy seeks to sustain balanced economic growth and job creation by:

- promoting City and Town Centres as the main foci for retail and office functions;
- providing a generous and continuous supply of land for employment uses; and
- promoting a balanced portfolio of employment sites throughout the Plan Area through the zoning of a complementary range of sites as follows:
  - Regional gateway and major transportation corridor sites;
  - Mixed use and regeneration sites close to major areas of disadvantage and social need and / or in support of economic or community regeneration;
  - Sites along main transportation routes within existing settlement development limits providing employment opportunities in local areas; and

- Established areas of existing employment.
- Acceptable Uses on employment zonings except where otherwise specified in individual zonings (based on the Planning (Use Classes) Order (Northern Ireland) 2004):
  - Class B1: Business (b) as a call centre
  - Class B1: Business (c) for research and development
  - Class B2: Light Industrial
  - Class B3: General Industrial
  - Class B4: Storage or Distribution

## A6 Local Development Plan 2020-2035

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Stage 1 of the LDP process culminates in the publication of the Preferred Option's Paper. This provides the basis for consulting with the public and stakeholders on a series of options for dealing with key issues within the plan area.

Preferred options LP1 and LP2 are particularly relevant for residential accommodation.

### **LP1: Accommodating new homes preferred option**

In order to support the ambitious growth aspirations for the city, the LDP will allocate sufficient land to accommodate 37,000 new housing units during the Plan Period in accordance with the following priorities:

- Increasing the density of housing development across the city of Belfast, focussing the highest density of development on the city centre and other locations which benefit from high accessibility to public transport facilities;
- Prioritising the re-use of previously developed land by setting an appropriate target for housing development on 'brownfield' land and encouraging the redevelopment of appropriate locations to contribute to urban regeneration;
- Concentrating growth within the existing settlement limits of the Belfast city urban area;
- Identifying opportunities for developments on the edge of settlements, but avoid any development in areas that could lead to the coalescence of our small settlements into the larger urban area; and
- Restricting housing development in the open countryside.

### **LP3 – Ensuring an appropriate mix of housing preferred option**

The Local Development Plan will include appropriate policies to support a mix of housing units being delivered over the plan period – in terms of size, types and tenures – to help meet the needs of the projected population (as identified through the latest local housing market analysis and future population projections). This will include:

- A requirement to help deliver mixed and balanced communities; and

- An appropriate mix of housing specified in relation to key housing land allocations and development opportunity sites to help promote choice and assist in meeting community needs.

Policy VE1 sets out the preferred option for employment land.

#### **VE1 - Employment land supply preferred option**

The LDP will seek to identify and maintain a flexible and varied supply of business accommodation and employment land that is of the right type and in the right locations. This should be based on the ambitious level of economic growth – projecting the creation of c. **46,000 additional jobs** over the plan period – to help Belfast compete with other cities across the UK.

Sufficient land will be identified to ensure between **486,400-608,000 sq m** of floorspace can be supplied for B-Class employment uses to 2035, or **25,600-32,000 sq m on average per year**. However, the approach to land supply will be flexible, based on the qualitative nature of supply, including its distribution across different growth sectors of the economy and different markets areas of the city.

Key Employment Locations:

1. Belfast City Centre
2. The Harbour Estate and Port, including Titanic Quarter
3. Land at Monagh Bypass / Upper Springfield Road
4. Land at Crumlin Road, including former Girdwood Barracks
5. Land at Springfield Road (Former Mackie's Site)
6. Castlereagh Industrial Estate
7. Queens Office Area
8. Stormont Office Node

# Appendix B – Methodologies and best practice for Urban Capacity Studies

## B1 Planning Policy Statement 12

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PPS12 sets out a broad methodology for carrying out urban capacity studies as part of development plan preparation in Northern Ireland. It outlines the main issues that should be dealt with when carrying out a study. The guidance is based on the principles expressed in the RDS.

Firstly, it highlights that urban capacity studies are an integral part of the development plan process and are crucial to the identification of sites for future housing by a methodology which follows a sequential approach.

### B1.1 Study Areas

RDS sets a regional target of 60% for the period up to its first review in 2010, for the location of urban housing growth within the existing urban areas of the cities and towns of over 5,000 population. It states that the potential for achieving the regional target will be determined through the development plan process using urban capacity studies to maximise the share of residential development that can be achieved within the urban footprint of a particular city or town.

With the threshold for this set at 5,000 population it would also appear a logical threshold above which an urban capacity study would be necessary to enable such determination of urban potential.

This guidance sets as a reasonable minimum requirement that urban capacity studies should in a development plan preparation be undertaken for the highest and second highest tiers of settlement in each district.

#### **Urban Footprint – Definition**

The boundary is represented by an uninterrupted line, often lying inside the planned settlement limit. It contains land which has a formal urban use and, for example, gardens on the edge of the settlement will be included within the urban area as they form part of a curtilage of a building. Undeveloped zoned land at the edge of the settlement is excluded.

### B1.2 Approach

PPS12 encourages the use of a ‘comprehensive survey’ approach when undertaking urban capacity studies. This involves a comprehensive survey of the entire area within the urban footprint by the definition of distinct character areas.

#### **Application of Character Assessment Approach**

This involves the classification of the entire study area into distinct character areas across four broad character types, through a comprehensive analysis which is heavily reliant on survey.

The four character area types are:

**Type 1.** Distinct areas of vacant/underutilised land – sites as a general rule should be of 0.1 hectares minimum size or with a potential of 10 dwellings minimum or less if local circumstances permit.

**Type 2.** Areas already with a land use commitment:

(a) Non-residential: including important public open spaces, established industrial areas, educational and healthcare premises.

(b) Yet to be established Residential: Comprising development currently under construction or with current planning approval.

**Type 3.** Established residential areas, possibly with minor non-residential uses, having a broadly similar character.

**Type 4.** Areas with a relatively higher propensity for change - including town centres, mixed use areas, transitional areas.

The character areas should be identified and defined on the basis of a clear and transparent assessment, taking into account, as appropriate, relevant planning history, land use, housing density, physical character and any other relevant factors. This is a suggested approach and there may be other methods that will achieve the same objectives. However, it is an important element of the entire urban capacity study and this may be open to scrutiny at the Public Inquiry, into the draft plan, depending on the nature and level of objections.

## Sequence

The urban capacity study for should follow the broad sequence of steps as set out below:

1. Urban Footprint Boundary
2. Identify Housing Commitments
3. Compile assets/constraints
4. Site Survey
5. Planning History
6. Select provisional urban capacity sites
7. Define character areas
8. Provisional windfall assessments.
9. Detailed Consultation
10. Potential yield summary and presentation.

## Estimating Yield

It is possible to go into varying levels of detail with regard to assessing yield and it will be a matter for the plan team to decide this and justify its decision. A design-led approach would be the most labour intensive but also the most realistic. Alternatively, a density multiplier approach can be adopted, which is a crude tool

for multiplying the total area of land identified through survey work by an average housing density.

A more design-led approach is generally preferable, however where plan teams consider that this is not appropriate, consideration could be given to adopting it for a number of representative areas to allow for subsequent extrapolation.

The following key elements should be taken into account in estimating yield.

### Density Levels

When it is necessary to identify typical bands of density in line with local circumstances and policy objectives for the RDS and PPSs, varying ranges of density bands might be considered appropriate.

The density level to be applied will depend on local circumstances, site location in relation to policy objectives, such as distance from public transport nodes etc.

Development plan teams will be expected to clearly identify and justify the density levels and application criteria to be used in the urban capacity study for their area, which will be available for scrutiny following publication of the draft plan.

## B1.3 Strategic Housing and Employment Land Availability Assessments

### B1.3.1 Planning Practice Guidance (England and Wales)

Planning Practice Guidance (PPG) is a continuously updated, web-based resource intended to assist practitioners with the understanding of planning legislation in England and Wales. Guidance is provided for Housing and Economic Land Availability Assessments, which states that the assessment should:

- Identify sites and broad locations with potential for development.
- Assess their development potential.
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

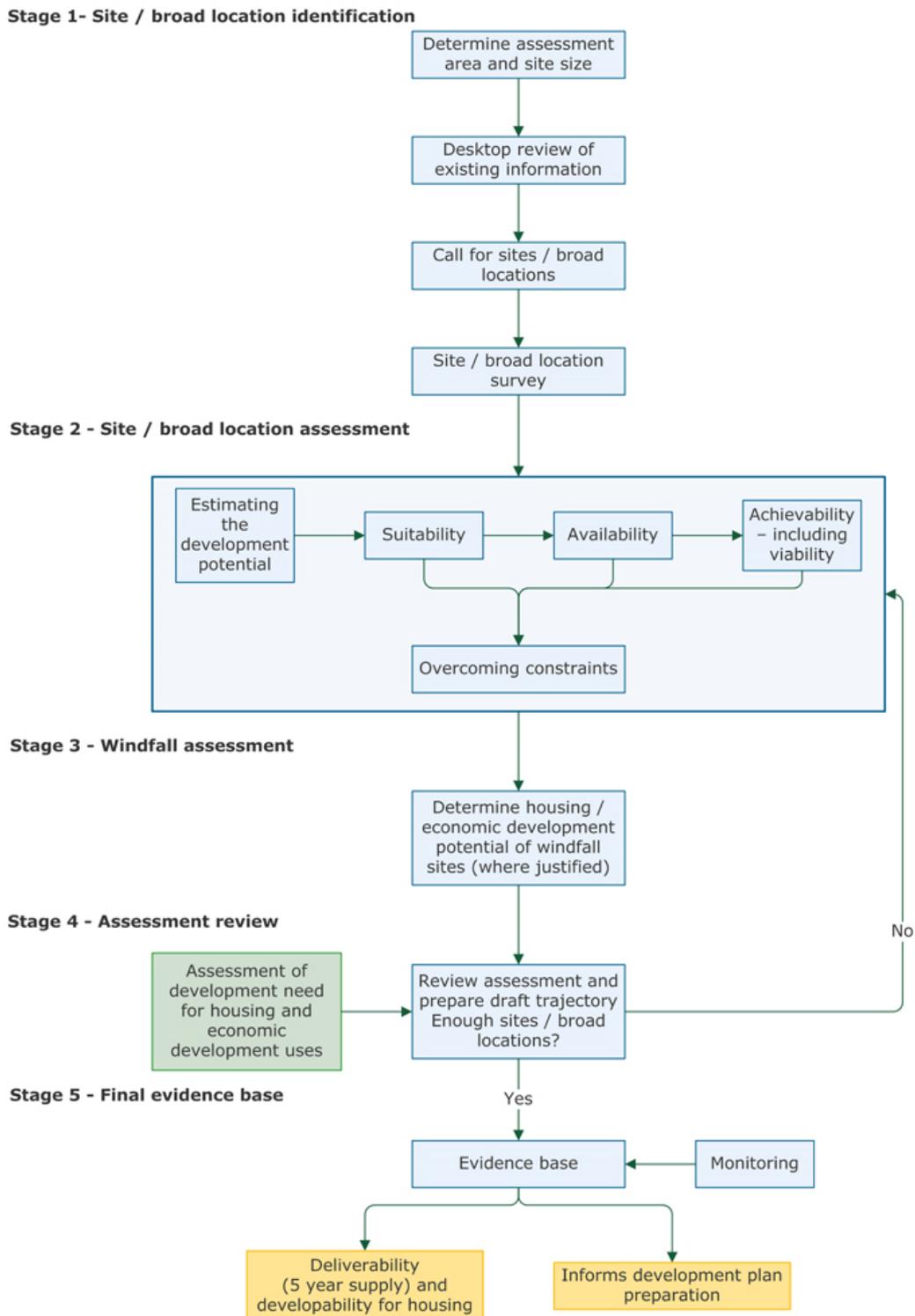
The PPG highlights the benefits of carrying out land assessments for housing and economic development as part of the same exercise, in order that sites may be allocated for land that is the most appropriate use.

The PPG offers guidance on undertaking each stage of the assessment, summarised in **Error! Reference source not found.** and **Error! Reference source not found.** below. The methodology presented in Section 3 seeks to align with the approach set out in the PPG.

**Figure 1: Guidance on site availability assessments provided in the PPG**

Stage	Guidance
<b>Stage 1: Identification of</b>	To comprehensively identify sites within the authority area, the local authority should seek to determine a site size threshold for inclusion

<b>Sites or Broad Locations for Development</b>	within the assessment, undertake a review of existing information on available sites followed by a Call for Sites. The PPG sets out detail on the types of characteristics that should also be recorded, from site size and constraints, through to development progress and likely environmental constraints and recommends that detailed site surveys should be undertaken to ratify inconsistencies between Call for Sites data and secondary evidence.
<b>Stage 2: Site/ Broad Location Assessment</b>	<p>The development potential of each site should be calculated using locally determined policies on density, existing development schemes or floor space density guides for specific employment industries. Sites should then be assessed for their suitability, availability and achievability for different uses. The PPG identifies that the following definitions, although recognises that these may be impacted by site constraints:</p> <ul style="list-style-type: none"> <li>• <b>Suitability:</b> Sites within existing development plans will generally be considered as suitable for development, whilst site constraints, impact on landscape, appropriateness for the market or contribution to regeneration priority areas will all contribute to determining a site's suitability.</li> <li>• <b>Availability:</b> A site is considered available for development when there are no legal or ownership problems, the landowner may have expressed an interest in selling the land.</li> <li>• <b>Achievability:</b> A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time.</li> </ul>
<b>Stage 3: Windfall Assessment</b>	Inclusions for windfall sites will only be permitted where there is compelling evidence that there has been consistent evidence of sites coming forward.
<b>Stage 4: Assessment Review and Stage 5: Final Evidence Base</b>	The final two stages of the assessment include mechanisms for monitoring and reviewing the assessment and for aligning with the final evidence base.



**Figure 2 PPG land availability assessment methodology flow chart (Paragraph 006, Reference ID: 3-006-20140306 [retrieved October 2016])**

## Appendix C – Methodology

**Table 1: Absolute constraints**

Information	Justification
Sites yielding less than 5 residential units or 500m <sup>2</sup> employment floor space	<p>UK Guidance sets a threshold of 0.25 ha however dBMAP currently designates sites under 0.25 ha (above 0.1 ha). It is considered appropriate to include all designated sites within dBMAP. These sites will be included for the purposes of the study.</p> <p>No specific size threshold was used when identifying new sites. Due to the context of Belfast and the city centre in particular it was considered that small sites even below 0.1ha in size may contribute to the housing capacity of Belfast. On this basis sites were only ruled out if the estimated yield was below 5 units.</p> <p>Sites yielding less 5 residential units or 500m<sup>2</sup> employment space would be regarded as windfall development.</p>
Evidence that the site is being developed for an alternative use	Where there is clear evidence that a site is being developed for an alternative use. Only sites where construction has commenced have been excluded.
<p>International Ecological Designations:</p> <ul style="list-style-type: none"> <li>• Special Areas of Conservation</li> <li>• Special Protection Area</li> <li>• Ramsar</li> </ul>	<p><i>Policy Context</i></p> <p>SPPS - Planning permission will only be granted for a development proposal that, either individually or in combination with existing and/or proposed plans or projects, is not likely to have a significant effect on:</p> <ul style="list-style-type: none"> <li>• a European Site (Special Protection Area, proposed Special Protection Area, Special Areas of Conservation, candidate Special Areas of Conservation and Sites of Community Importance); or</li> <li>• a listed or proposed Ramsar site.</li> </ul> <p>As it is not possible to determine whether a development proposal would have a significant impact on these sites, this criterion has been deemed an absolute constraint.</p>
<p>National Ecological Designations</p> <ul style="list-style-type: none"> <li>• Area of Special Scientific Interest</li> <li>• A Nature Reserve or National Nature Reserve</li> <li>• Marine Conservation Zone</li> </ul>	<p><i>Policy Context</i></p> <p>SPPS - A development proposal which could adversely affect a site of national importance may only be permitted where the benefits of the proposed development clearly outweigh the value of the site.</p> <p>As it is not possible to determine whether a development proposal would have a significant impact on these sites, this criterion has been deemed an absolute constraint.</p>

Information	Justification
Flood Risk	<p>The RDS 2035 (RDS) recognises the need to avoid, where possible, the selection of flood prone land for employment and housing growth. It urges the planning system to adopt a <b>precautionary approach</b> to development in areas of flood risk and the use of the latest flood risk information that is available in order to properly manage development.</p> <p>The aim of the SPPS in relation to flood risk is to prevent future development that may be at risk from flooding or that may increase the risk of flooding elsewhere.</p> <p>LDPs must take account of the most up to date information on flood risk, in particular that which is available on the Strategic Flood Map. There should also be consultation with Rivers Agency from an early stage on strategic issues relating to flood risk management throughout the plan area and beyond.</p> <p><b>LDPs should apply a precautionary approach to development in areas that may be subject to flood risk presently or in the future as a result of climate change predictions. Consequently, LDPs should not bring forward sites or zone land that may be susceptible to flooding, now or in the future, unless in exceptional circumstances. Where, exceptionally, a new plan brings forward such a site, it needs to explain the rationale and set out the measures necessary to manage or mitigate the risk.</b></p> <p>Built development must not be permitted within the flood plains of rivers or the sea unless the following circumstances apply:</p> <ul style="list-style-type: none"> <li>• the development proposal constitutes a valid exception to the general presumption against development in flood plains;</li> <li>• the development proposal is of overriding regional or sub-regional economic importance; and</li> <li>• the development proposal is considered as minor development in the context of flood risk.</li> </ul> <p>The following flood risk categories are identified on the Strategic Flood Maps (NI). In line with the precautionary approach required the most recent data relating to climate change flood risk has been used:</p> <p><b>River (Fluvial) Floodplain</b> – Housing or employment uses are unlikely to meet the specific circumstances whereby development can be permitted in the flood plain. Land raising is also not an appropriate solution. <b>We have included river floodplains as an absolute constraint.</b></p> <p><b>Coastal Flood Plain</b> – Housing or employment uses are unlikely to meet the specific circumstances whereby development can be permitted in the coastal flood plain. However, land raising may be an appropriate solution, <b>therefore this will not be considered as an absolute constraint.</b></p> <p><b>Surface Water (Pluvial) Flood Risk outside Flood Plains</b> - Planning authorities should only facilitate development in areas where there is evidence of a history of surface water flooding when a developer is</p>

Information	Justification
	<p>able to demonstrate, through a Drainage Assessment (DA), that the flood risk can be effectively controlled and mitigated and that it will not create greater potential for surface water flooding elsewhere. <b>On this basis, surface water is not considered an absolute constraint.</b></p> <p><b>Development in Proximity to Reservoirs</b> – New development within the flood inundation area of a controlled reservoir can only be justified where the condition, management and maintenance regime of the reservoir is appropriate to provide assurance regarding reservoir safety. Accordingly, planning permission for new development should only be granted to such assurance, provided by a suitably qualified engineer and supported by DARD Rivers Agency, as the responsible body for the management of reservoir flood risk. <b>This is not an absolute constraint.</b></p>
Historic Parks, Gardens and Demesne	<p>SPPS - Planning permission should not be granted for development that would lead to the loss of, or cause harm to, the overall character, principal components or setting of Historic Parks, Gardens and Demesnes.</p> <p>It is not possible to determine at this stage whether a development proposal would meet this criterion, however it has been noted that Stormont Office node is a potential location for further employment use and is designated as an Historic Park, Garden and Demesne. <b>On this basis, it has not been considered as an absolute constraint.</b></p>
Areas of existing open space	<p>SPPS - There will be a <b>policy presumption against the loss of open space to competing land uses in Local Development Plans (LDPs) irrespective of its physical condition and appearance.</b> Any exception to this general approach should only be appropriate where it is demonstrated that redevelopment would bring substantial community benefit that outweighs the loss of the open space; or where it is demonstrated that the loss of open space will have no significant detrimental impact.</p> <p><b>On this basis, sites which have been recoded within dBMAP as existing open space will be considered as an absolute constraint.</b></p>

**Table 2 – Suitability Assessment**

Information	Categories	Assessment
District Centre	Yes No	GIS analysis – data provided by BCC.
Shopping / Commercial Area	Yes No	GIS analysis – data provided by BCC.
Area of Townscape Character	Yes No	GIS analysis – data provided by BCC.
Lagan Valley Regional Park	Yes No Part	GIS analysis – data provided by BCC.

Information	Categories	Assessment
Local Landscape Policy Area	Yes No Part	GIS analysis – data provided by BCC
Site of Local Nature Conservation Importance	Yes Part No	GIS analysis – data provided by BCC.
AQMA	Yes Part No	GIS analysis – data provided by DEFRA via BCC
Conservation Area	Significant (>75%) Serious (50-75%) Considerable (25-50%) Minor (0-25%) None (0)	GIS analysis – data provided by BCC.
Area of Special Scientific Interest	Significant (>75%) Serious (50-75%) Considerable (25-50%) Minor (0-25%) None (0) Significant (>75%)	GIS analysis – data provided by DAERA
Monument Record	Significant (0m) Serious (2-25m) Considerable (25-50m) Minor (50-75m) None (75m)	GIS analysis – data provided by DfC.
Neighbourhood Renewal Area	Significant (>75%) Serious (50-75%) Considerable (25-50%) Minor (0-25%) None (0) Significant (>75%)	GIS analysis, based on edge-to-edge straight line distances. Data provided by Council.
Listed Building	Significant (0m) Serious (2-25m) Considerable (25-50m) Minor (50-75m) None (75m)	GIS analysis, based on edge-to-edge straight line distances. Data provided by Council.
Tidal Flood Plan	Significant (>75%) Serious (50-75%) Considerable (25-50%) Minor (0-25%) None (0) Significant (>75%)	GIS analysis, based on edge-to-edge straight line distances. Data sourced from Department for Education online database.
Surface Water	Within 800m Between 800-1,200m More than 1,200m	GIS analysis, based on edge-to-edge straight line distances. Data sources from Epracur.
Topography	Flat Slightly Sloping Steeply Sloping	Based on site observations.
Utilities on site	Major constraint	Based on site observations.

Information	Categories	Assessment
	Minor Constraint None	
Known Contamination and Ground Stability Issues	Yes No	Is there a GIS data source we can use – at present we have stated ‘no’ for all sites
Neighbouring area characteristics	Residential Commercial Leisure and Recreation	Based on site observations.  Note: where the site was in a mixed use are, judgement was made as to the dominant use
Residential Area Characteristics	High Density Medium Density Low Density	Based on site observations.
Protected Route	Adjacent (0m) Very Close (0-250m) Close (250-500m) Far (500-750m) Very Far (>750m)	GIS
Distance from Arterial Route	Within 100m (0-100m) 100-200m (100-200m) 200-400m (200-400m) 400m+ (>400m)	GIS
Highways Access to Site	Adjacent (0m) Very Close (0-250m) Close (250-500m) Far (500-750m) Very Far (>750m)	GIS
Distance from Bus Stop	Adjacent (0m) Very Close (0-250m) Close (250-500m) Far (500-750m) Very Far (>750m)	GIS
Distance from Train Halt	Adjacent (0m) Very Close (0-250m) Close (250-500m) Far (500-750m) Very Far (>750m)	GIS
Cycling Distance to City Centre	City Centre (0m) 5min cycle (<1206m) 10min cycle (>1206 & <2412m) 10min+ cycle (>2412m)	GIS
Walking distance to City Centre	City Centre (0m) 5min walk (<537m) 10min walk (>537 & <-1074m) 10min+ walk (>1074m)	GIS

Information	Categories	Assessment
Proximity to BRT network	Adjacent (0m) Very Close (0-250m) Close (250-500m) Far (500-750m) Very Far (>750m)	Has not been assessed yet

**Table 3 - Availability assessment**

Information	Categories	Assessment
Planning history	<ol style="list-style-type: none"> <li>1. Site has full planning permission for housing</li> <li>2. Site has full planning permission for employment</li> <li>3. Site has full planning permission for traveller pitches</li> <li>4. Site has outline planning permission for housing</li> <li>5. Site has outline planning permission for employment</li> <li>6. Site has outline planning permission for traveller pitches</li> </ol>	<p>Housing sites based on relevant planning approvals up to June 2017.</p> <p>Employment sites based on relevant planning approvals up to August 2017.</p>
Site for sale	<p>Yes</p> <p>No</p>	Review of property websites to identify sites which are on the market. (Search carried out in October 2017)
Willing landowner	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No</li> <li>3. Unknown</li> </ol>	<p>The call for sites usually informs this part of the assessment.</p> <p>For this urban capacity study, we have highlighted sites where the willingness of the landowner is 'unknown'.</p> <p>Where there is evidence of recent planning applications being submitted or the sites is for sale we have generally stated that the landowner is 'willing' to see development come forward.</p> <p><b>It is recommended that BCC consider further how the willingness of landowners can be</b></p>

Information	Categories	Assessment
		<b>confirmed later in the LDP process.</b>
Currently available	<ol style="list-style-type: none"> <li>1. Vacant</li> <li>2. Temporary use</li> <li>3. Expected to cease</li> <li>4. Ongoing use not expected to cease</li> </ol>	Based on site observations.
Multiple ownerships (where information exists)	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No</li> <li>3. Unknown</li> </ol>	<p>Assumption made on the basis of the complexity of the site based on desktop observations.</p> <p>It is recommended that BCC consider further the complexity of landownership later in the LDP process where this might be considered a major constraint on the delivery of housing sites.</p>
Potential for ransom strips	<ol style="list-style-type: none"> <li>1. Potential for ransom strip</li> <li>2. No potential for ransom strip</li> </ol>	Assessment based on site observations for example where access is restricted.

**Table 4: Achievability assessment**

Information	Categories	Assessment
Market attractiveness	<ul style="list-style-type: none"> <li>• Sites that the market is likely to deliver</li> <li>• Site which may come forward but will require some form of public sector support (social housing etc.)</li> <li>• Sites which the market is unlikely to bring forward for development within their plan period</li> </ul>	Currently the assessment is based on professional judgement. The majority of sites were deemed to be either 'sites that the market is likely to deliver' or 'sites that may come forward but will require some form of public sector support'

Information	Categories	Assessment
Infrastructure Constraints - Waste Water Treatment Infrastructure	Capacity within system No immediate capacity Capacity within 5 years	Currently the assessment assumes there is capacity in the system for all sites.  The WWTW data provided by NI Water highlights the constraints on development within specific catchments, however this cannot inform 'achievability' on a site-specific basis. It is recognised that significant upgrades are required to the Belfast WWTW to accommodate the development envisaged in the emerging LDP.
Infrastructure constraints – Transport Network	Network can accommodate new development  Infrastructure works required	Currently the assumption has been made that there is capacity in the network to accommodate all new development.
Phasing	0-5 years 5-10 years 10-15 years Over 15 years	See Section 3.4.1.2

## Appendix D – Drawings

- Drawing 001 – All Sites
- Drawing 002 – City Centre Sites
- Drawing 003 – Character Areas
- Drawing 004 – WwTW Catchments

## Appendix E - Sites outside 2017 Urban Footprint

UCS Ref		Source	Housing Type	Housing Yield	Employment Yield
<b>New sites within existing employment zoning</b>					
3647	Lands at Glenbank Industrial Estate	New sites within existing employment zoning		0	9586
3830	Springbank industrial estate	New sites within existing employment zoning		0	15720
<b>Housing Monitor</b>					
1961	229 Whiterock Road	Housing Monitor	Semi-Detached	50	0
2088	Adjacent To Mill Avenue	Housing Monitor	Semi-Detached	120	0
2777	Belvoir Park Hospital, Hospital Road	Housing Monitor	Semi-Detached	310	0
2022	Clare Glen	Housing Monitor	Semi-Detached	30	0
2130	Field to The North of Lyndhurst View Park	Housing Monitor	Semi-Detached	86	0
3279	Land at Church Road/Ballygowan Road	Housing Monitor	Detached	9	0
3315	Land at Lower Braniel Road	Housing Monitor	Semi-Detached	164	0
3184	Land Northwest Of 32 Lagmore Road	Housing Monitor	Semi-Detached	28	0
3239	Land West of Monagh By-Pass South of Upper Springfield Road	Housing Monitor	Semi-Detached	500	4000
1944	Lands to The Rear Of 171-177 Glen Road	Housing Monitor	Semi-Detached	315	0
2749	Lands to The Rear of Hampton Park	Housing Monitor	Detached	35	0
3229	Site East of Ballygomartin Reservoir, Ballygomarti	Housing Monitor	Semi-Detached	144	0
2000	South of Wolfhill Avenue, Including Ligoniel Bridge	Housing Monitor	Semi-Detached	322	0
<b>New Sites</b>					
3873	Lands in The Ballgomartin Area	New Site	Semi-Detached	26	0
3958	Lagmore Road, Dunmurry	New Site	Semi-Detached	16	0
3594	Site West of Ben Madigan Park, Antrim	New Site	Detached	21	0

3758	Adjacent To 71 Church Road, Loughview	New Site	Semi-Detached	23	0
3760	Land at Rear of Elsmere Park, Adjacent Elsmere Manor	New Site	Semi-Detached	20	0
3766	Surface level car park on lands of AFBI.	New Site	Apartment	79	0
3780	Land to rear of dwellings at Trossachs Drive	New Site	Semi-Detached	51	0
3790	Land parcel bounding Mill Race to North	New Site	Semi-Detached	130	0

# Appendix F – Summary Spreadsheet

## Appendix G – Site specific Pro-Forma's

### Area and Distance Measures

Output Value	Description
NONE	None of the site
MINOR	0-25% of the site
CONSIDERABLE	25-50% of the site
SERIOUS	50-75 % of the site
SIGNIFICANT	75-100% of site

Output Value	Description
Within 100m	Within 100m of feature
100-200m	Within 100-200m of feature
200-400m	Within 200-400m of feature
400m+	Greater than 400m from feature

Output Value	Description
ADJACENT	0m from Feature
VERY CLOSE	0 – 250m from Feature
CLOSE	250 – 500m from Feature
FAR	500 – 750m from Feature
VERY FAR	750m+ from Feature

Output Value	Description
CITY CENTRE	Within the City Centre
5Min Cycle	Within 5min Cycle from City Centre
10Min Cycle	Within 5-10mins Cycle from City Centre
10Min+ Cycle	Greater than 10min cycle from City Centre

Output Value	Description
CITY CENTRE	Within the City Centre
5Min Walk	Within 5min Walk from City Centre
10Min Walk	Within 5-10mins Walk from City Centre
10Min+ Walk	Greater than 10min Walk from City Centre