



## Local Development Plan 2032

### Draft Plan Strategy

### Representation Form

Please complete this representation form online and email to [LDP@lisburncastlereagh.gov.uk](mailto:LDP@lisburncastlereagh.gov.uk) or alternatively print and post a hardcopy to:-

Local Development Plan Team  
Lisburn & Castlereagh City Council  
Lagan Valley Island  
Lisburn  
BT27 4RL

All representations must be received no later that 5pm on the 10<sup>th</sup> January 2019

#### SECTION A: YOUR DETAILS

Please tick one of the following:-

- Individual
- Planning Consultant / Agent
- Public Sector / Body
- Voluntary / Community Group
- Other

First Name

Last Name

Details of Organisation / Body

Address

Postcode

Email Address

Phone Number

### Consent to Publish Response

Under planning legislation we are required to publish responses received in response to the Plan Strategy, however you may opt to have your response published anonymously should you wish.

Even if you opt for your representation to be published anonymously, we still have a legal duty to share your contact details with the Department for Infrastructure and the Independent Examiner appointed to oversee the examination in public into the soundness of the Plan Strategy. This will be done in accordance with the privacy statement detailed in Section C.

- Please publish *without* my identifying information
- Please publish with only my Organisation
- Please publish with my Name and Organisation

### SECTION B: YOUR REPRESENTATION

Please set out your comments in full. This will help the independent examiner understand the issues you raise. *You will only be permitted to submit further additional information to the Independent Examiner if the Independent Examiner invites you to do so.*

What is your view on the Plan Strategy?

- I believe it to be SOUND

If you consider the Draft Plan Strategy to be sound, and wish to support the Plan Strategy, please set out your comments below:-

Please find attached covering letter with representations.

OR

- I believe it to be UNSOUND

**PLAN COMPONENT** - To which part of the Plan Strategy does your comment relate?

*IF YOU WISH TO SUBMIT ANY FURTHER REPRESENTATIONS, PLEASE COMPLETE SECTION B FOR EACH INDIVIDUAL ISSUE*

**Part 1 – Plan Strategy**

- Chapter 1 - Introduction
- Chapter 2 - Policy & Spatial Context
- Chapter 3 - Vision, Plan Objectives & Strategic Policies
- Chapter 4 - Growth Strategy & Spatial Framework
- Chapter 4A - Enabling Sustainable Communities & Delivery of New Homes
- Chapter 4B - Driving Sustainable Economic Growth
- Chapter 4C - Growing our City, Town Centres, Retailing & Offices
- Chapter 4D - Promoting Sustainable Tourism, Open Space, Sport & Recreation
- Chapter 4E - Sustainable Transport & Other Infrastructure
- Chapter 4F - Protecting & Enhancing the Historic & Natural Environment
- Chapter 5 - Monitoring & Review

**Part 2 –Operational Policies**

- Operational Policy (Please State Individual Policy using Policy Reference e.g. HOU 1)

**SOUNDNESS TEST:**

Please identify which test(s) of soundness your representation relates to, having regard to Development Plan Practice Note 6 (available on the Planning Portal website at [https://www.planningni.gov.uk/index/s/development\\_plan\\_practice\\_note\\_06\\_soundness\\_version\\_2\\_may\\_2017\\_.pdf](https://www.planningni.gov.uk/index/s/development_plan_practice_note_06_soundness_version_2_may_2017_.pdf) )

- P1 Has the Plan Strategy been prepared in accordance with the council’s timetable and the Statement of Community Involvement?
- P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?
- P3 Has the Plan Strategy been subject to sustainability appraisal including Strategic Environmental Assessment?
- P4 Did the Council comply with the regulations on the form and content of its Draft Plan Strategy and procedure for preparing the Draft Plan Strategy?
- C1 Did the Council take account of the Regional Development Strategy?
- C2 Did the Council take account of its Community Plan?
- C3 Did the Council take account of policy and guidance issued by the Department?
- C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council’s district or to any adjoining council’s district?
- CE1 Does the Plan Strategy set out a coherent strategy from which its policies & allocations logically flow & where cross boundary issues are relevant it is not in conflict with the Plan Strategies of neighbouring councils?
- CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?
- CE3 Are there clear mechanisms for implementation and monitoring?
- CE4 Is it reasonably flexible to enable it to deal with changing circumstances?

## DETAILS

Please give details of why you consider the Plan Strategy to be **unsound** having regard to the test(s) you have identified above. Please be as precise as possible.

*(If submitting a hardcopy & additional space is required, please continue on a separate sheet)*

## MODIFICATIONS

If you consider the Plan Strategy to be **unsound**, please provide details of what changes you consider necessary to make the Plan Strategy sound.

*(If submitting a hardcopy & additional space is required, please continue on a separate sheet)*

I wish to attach supporting information with my representation e.g. map

**IF YOU WISH TO SUBMIT ANY FURTHER REPRESENTATIONS, PLEASE COMPLETE SECTION B FOR EACH INDIVIDUAL ISSUE**

## SECTION C: DEALING WITH YOUR REPRESENTATION

Please indicate how you would like your representation to be dealt with.



Written Representation



Oral Representation

**Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.**

## SECTION D: DATA PROTECTION

In accordance with the Data Protection Act 2018, Lisburn & Castlereagh City Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure.

It should also be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure (DfI) as they will be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the privacy section at [www.lisburncastlereagh.gov.uk/information/privacy](http://www.lisburncastlereagh.gov.uk/information/privacy)

By proceeding and signing this representation you confirm that you have read and understand the privacy notice above and give your consent for Lisburn & Castlereagh City Council to hold your personal data for the purposes outlined.

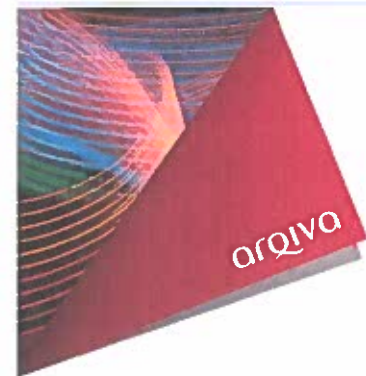
Please note that when you make a representation (or counter-representation) to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the council's website. Copies of all representations will be provided to DfI and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for Independent Examination. A Programme Officer will also have access to this information during the IE stages of the Plan preparation. DfI, the Programme Officer and the Independent Examiner will, upon receipt, be responsible for the processing of your data in line with prevailing legislation. If you wish to contact the council's Data Protection Officer, please write to:

Data Protection Officer  
Lisburn & Castlereagh City Council,  
Civic Headquarters,  
Lagan Valley Island,  
Lisburn,  
BT27 4RL

or send an email to: [data.protection@lisburncastlereagh.gov.uk](mailto:data.protection@lisburncastlereagh.gov.uk) or telephone: 028 9244 7300.

Signature

Date



Arqiva

Black Hill Transmitting Station  
Salsburgh  
Shotts  
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[www.arqiva.com](http://www.arqiva.com)

Lisburn and Castlereagh City Council  
Planning Department  
Development Planning  
Civic Headquarters  
Lagan Valley Island  
Lisburn  
Co. Antrim  
BT27 4RL

Our Ref: Lisnagarvey MF/ 141043

**Via email**

20 December 2019

Dear Sir / Madam

**REPRESENTATION BY ARQIVA LTD**

**LISNAGARVEY MEDIUM FREQUENCY RADIO TRANSMITTING STATION, 223  
HILLSBOROUGH ROAD, LISBURN, BT27 5RJ**

**LISBURN AND CASTLEREAGH CITY COUNCIL**

**LOCAL DEVELOPMENT PLAN – DRAFT PLAN STRATEGY**

We refer to the emerging Local Development Plan which will guide future development across the Council area up to 2030 and specifically the current consultation on the draft Plan Strategy.

Regulation 10 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 specifically requires the local Council to consult with Arqiva Ltd as an electronic communications code system operator pursuant to Section 106 (3) of the Communications Act 2003 as amended.

**Arqiva**

In our representation to the Proposed Options Paper in May 2017, we explained that Arqiva owns, hosts and operates shared radio electronic communications infrastructure. It owns

and operates the UK's TV and radio broadcasting transmitter network and it hosts a large number of other radio communications services on its sites.

Arqiva owns and operates the regionally important medium frequency (MF) radio transmitting station at Hillsborough Road, Lisburn, adjacent to the existing Marks and Spencers store in Sprucefield.

### **Draft Plan Strategy - soundness**

The Arqiva transmitter site falls within the boundaries of Sprucefield Regional Shopping Centre as shown on page 105. Our site is likely to be important in bringing forward further development at Sprucefield in support of Strategic Policy 14 Town Centres and Policy SMU03 Sprucefield Regional Shopping Centre.

Our site is recognised as a "development opportunity" within the boundaries of the shopping centre as explained within page 102 of Part 1 of the Draft Plan Strategy. This likely reflects our earlier representations to the West Lisburn Development Framework Review, 2018 (Draft) where the development opportunity of the transmitter site was accepted.

We emphasise that our site does not fall within the identified "area of development potential" [our emphasis], but it is an existing operational site (brownfield) which is likely to be suitable for alternative use in its own right in due course as a **development opportunity** as recognised in the Draft Plan Strategy. Alternative development at the Arqiva transmitter site is not and should not be seen as reliant on the development of the area of development potential.

On the other hand, it should be recognised that our frontage site might be an important gateway to 'opening up' the land identified as development potential - subject to already recognised constraints such as those related to highway matters.

***Accordingly, reflecting all of this, we support Strategic Policy 14 Town Centres and Policy SMU03 Sprucefield Regional Shopping Centre and the inclusion of the Arqiva site. We support the general emphasis of the policy to not only support retailing, but a range of complementary uses at Sprucefield. We consider these policies to be "sound".***

### **Redevelopment opportunity within the Plan Period**

As explained above, various uses identified in the Draft Plan Strategy might be a suitable opportunity at the Arqiva site (including uses not identified)..

As we have explained in earlier representations, Arqiva has explored options for redeveloping the Lisnagarvey transmitter site since as early as 1995. In November 1998, outline planning permission (S/95/0859) was granted to redevelop the transmitter site as an extension to the adjacent Marks & Spencer store, with a restaurant and retail warehousing. This permission was subsequently renewed in 2002 (S/1995/0860). Ultimately the

development was not implemented, as it hinged on the relocation of the transmitter station which did not materialise for a number of acquisition and major operational reasons.

In 2012, the Department's Strategic Planning Division supported, through its Preliminary Application Discussion (PAD) procedure, the reuse of much of the site to provide a data centre complex of 'strategic significance' (but retaining the radio transmitter). Again, this development was not progressed further through the PAD process and to an actual application for planning permission, as Arqiva decided to commercially move away from wholesale data centre development at that time.

However alternative uses for the transmitter site clearly exist which might include retail uses or complementary uses as identified in the draft Plan Strategy.

The 'wholesale' redevelopment of the site has been and still remains dependent on the switchover of the UK's radio services from analogue to digital audio broadcasting (DAB) and the UK Government's timetable for such switchover. Radio switchover will remove the need for the transmitter site at Lisnagarvey and make it wholly available for alternative uses.

We have previously explained that radio switchover was first set out in The Digital Britain Report in 2009 and in July 2010 the Government subsequently launched its Digital Radio Action Plan which stated that a decision on whether to set a date for digital radio switchover would be considered when certain coverage and listening criteria have been met.

It is very significant that there has been a considerable increase in DAB coverage across the UK and listener take up, to a point that the criteria within the Digital Radio Action Plan is likely to be soon met. Although the Government has still not yet set a date for the switchover of radio services this is anticipated within the plan period and so further reinforces the inclusion of the transmitter site within the boundaries of the Sprucefield Regional Shopping Centre

As such, we remain confident that this will result in the cessation of MF radio broadcasting at the Lisnagarvey transmitter station within the Plan period and hence its availability for comprehensive alternative development. In the worst case that the Government announces that radio switchover is unlikely to happen within the plan period, a significant amount of site rationalisation is still possible and availability for alternative use, retail or otherwise.

***So, in conclusion, we strongly endorse the policy emphasis in the Draft Plan Strategy to support the role of Sprucefield as a regional retailing destination at a key strategic location within Northern Ireland. The redevelopment of the Arqiva transmitter site, occupying extensive land within the boundary of the Shopping Centre, will and should form part of that policy vision.***

If beneficial we would be pleased to further meet representatives of the Council's Development Planning team to discuss many of the above issues and considerations at an early stage.

In the meantime, if you would like to discuss this matter then please do not hesitate to contact me.



Yours faithfully



Arqiva