



## 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 2020

#### 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:-

Not Applicable

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

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
- Chapter 4 - Strategic Policies and Spatial Strategy
- Chapter 4A - Enabling Sustainable Communities & Delivery of New Homes
- Chapter 4B - Driving Sustainable Economic Growth
- Chapter 4C - Growing our City, Town Centres, Retailing & Other Uses
- Chapter 4D - Promoting Sustainable Tourism, Open Space, Sport & Outdoor Recreation
- Chapter 4E - Protecting & Enhancing the Historic & Natural Environment
- Chapter 4F - Supporting Sustainable Transport & Other Infrastructure
- 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.

**See Attached Sheet.**

*(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.

**See Attached Sheet**

*(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**

9 January 2020.

# Lisburn and Castlereagh City Council Local Development Plan

## Response to Draft Plan Strategy

Ref: 16/11 (25)(dPS)

Client: [REDACTED]

### Introduction

1. Our client [REDACTED] own lands at 9 Knockbracken Road, Belfast which abut existing housing lands, which are currently being developed for housing. Our client seeks to have additional lands zoned for housing in the forthcoming draft Plan.
2. Our client's lands are on the edge of Castlereagh and while they were included in the Rural Landscape Wedge in draft BMAP, BMAP has never been adopted. There is therefore no Rural Landscape Wedge and the lands that are subject of this submission are countryside lands on the settlement edge.
3. We note that the Council propose to designate Landscape Wedges in Map 4 and Council's online Plan Strategy Map viewer includes a Rural Landscape Wedge CR 3 which we take to be a reference to draft BMAP. Our client objects to this designation as the Rural Landscape Wedge was never adopted and the quashed version of BMAP excluded policies for the Rural Landscape Wedge and deferred largely to Planning Policy Statement 21 Sustainable Development in the Countryside for determining development proposals in this part of the Countryside. We have reviewed the draft Plan Strategy and note the inclusion of a Landscape Wedge under Strategic Policy 19 and note that the Council has carried this designation forward from the existing development plan and that further work in reviewing existing and future landscape wedges will be assessed as part of the Local Policies Plan. We reserve the right to comment further on this in due course. However, we make the following comments in the interim.
4. A map of our client's lands is provided at **Appendix A**.

### Previous Comments of Planning Appeals Commission

5. When draft BMAP was published in 2004, [REDACTED] objected, seeking his lands (circa 1 ha) be included in the settlement limit and removed from the proposed Rural Landscape Wedge.

6. It can be seen from the extract below that the Planning Appeals Commission (PAC) has previously found these lands to be suitable for inclusion within the settlement limit and that the Rural Landscape Wedge would not be prejudiced if these lands were included in the settlement limit.

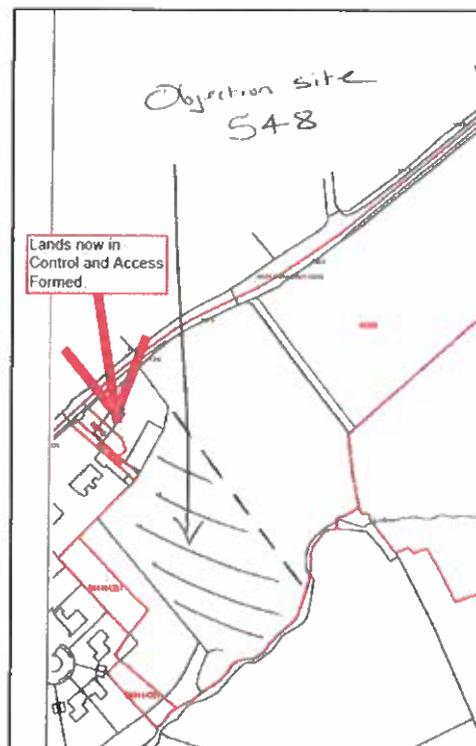
**Lands at Knockbracken Road**

**Objections 548, 139** SA8 (Type)

Objection site 139 (0.99 hectare) abuts the development limit on its western and north western boundaries. The south eastern boundary is defined by vegetation. The objection site lies within the RLW. The objection site is not visible from the Saintfield Road and would be partially visible from the Knockbracken Road on approach from the east. We consider that development of the site would have a localised visual impact. We consider that the function of the RLW would not be prejudiced if the site was developed and included within the development limit. Its inclusion would not bring development any closer to the boundary at Carryduff. We consider that inclusion of the objection site would constitute rounding off of the development limit.

The site has no road frontage and Roads Service find it unacceptable as access cannot be achieved. We note that the objector has proposed access from Brackenwood Crescent however it is not specified how this is to be achieved. There do

Extract of PAC Report onto draft BMAP Part 2 Castlereagh Borough Council Area



Map of Site with new Access identified.

**Land Ownership**

7. At the time of the Inquiry into draft BMAP [REDACTED] did not identify a suitable access from the Knockbracken Road into the subject lands. That was the only reason the PAC did not recommend the

lands be included in the settlement limit. However since then [REDACTED] has secured planning approval for a new access road from the Knockbracken Road into the subject lands.

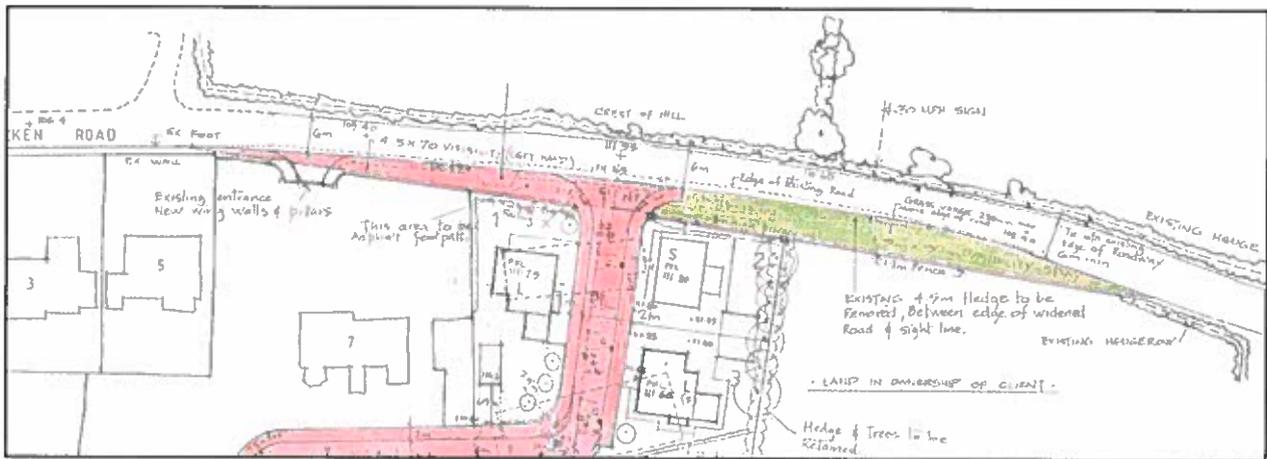
**Planning Permission**

8. [REDACTED] has obtained full planning permission for housing development taking a new access from Knockbracken Road through No 9. This was approved under the following:

- a. Y/2012/0324/O housing development at rear of 7 Knockbracken Road;
- b. LA05/2016/075/RM 3 No 2 storey dwellings approved on 31<sup>st</sup> May 2017.

**Approved Visibility Splays**

9. An extract of the approved visibility splays is provided below where it can be seen that the splays of 4.5m X 70m have been approved to the left of the egress and 4.5m x 90m have been approved to the right of the egress.



**Approved Visibility Splays Provided on Site**

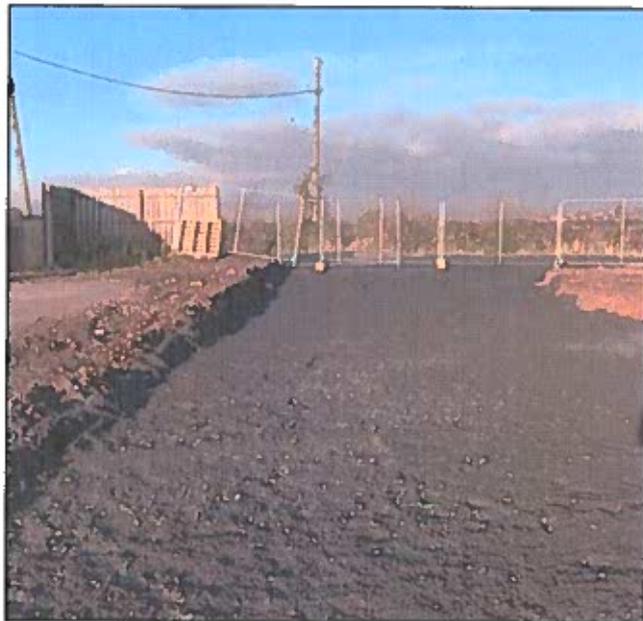
10. The access that has been provided for this site is comfortably capable of providing safe and convenient access to the site for circa 30-35 dwellings.

**Works on Site**

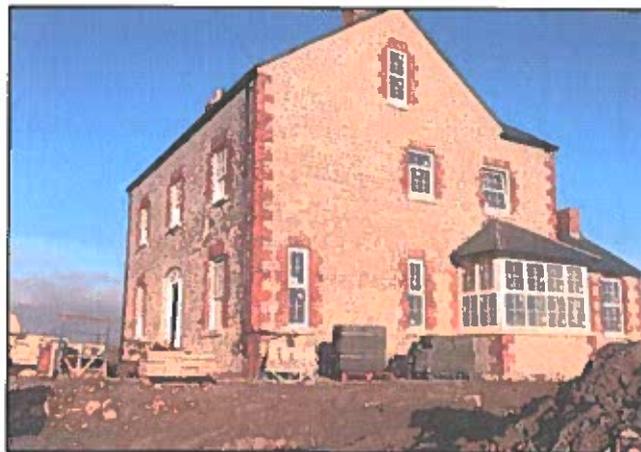
11. Works have commenced on site and the access has been formed along with the base of an estate road and a single dwelling has been constructed. These are shown below.



**Access and Vicinity Splays to lands at Knockbracken Road**



**Base of an estate road formed from Knockbracken Road**



**Dwelling erected at Knockbracken Road**

12. As such the subject lands are simply a rounding off site that will not cause any harm to any existing or future landscape wedge. The access to the site has been achieved and given the previous comments of the PAC and the planning history for the site access and abutting lands this site is now suitable and deliverable for housing and should be included in the LCCC Plan as a housing site.

13. While we anticipate more discussion about the suitability of these lands for development in the Local Policies Plan, we would request that this site is included in the Council's future Housing Monitor Report and its Urban Capacity Study to ensure that it is included when considering future housing land supply for urban Castlereagh.

#### **Conclusion**

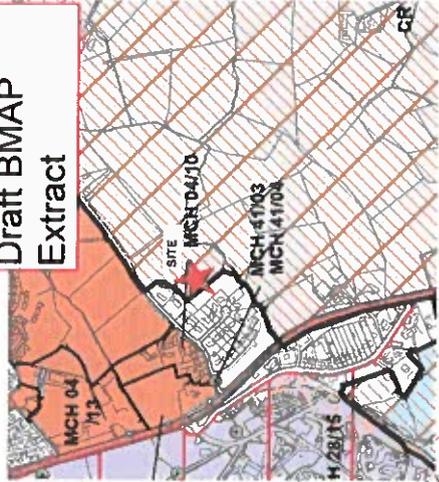
14. In conclusion, we object to the extent of the proposed landscape wedge under Strategic Policy 19 at Knockbracken Road and request our client's subject lands, as identified, are excluded from it. We further request our client's subject lands are included in the settlement limit for housing development.

#### **Appendix**

A                      Site Boundary

**NOTE:**  
 The density & subject is decided site terms and density address  
 the responsibility of the consultant to study the project of any  
 development in the planning process.

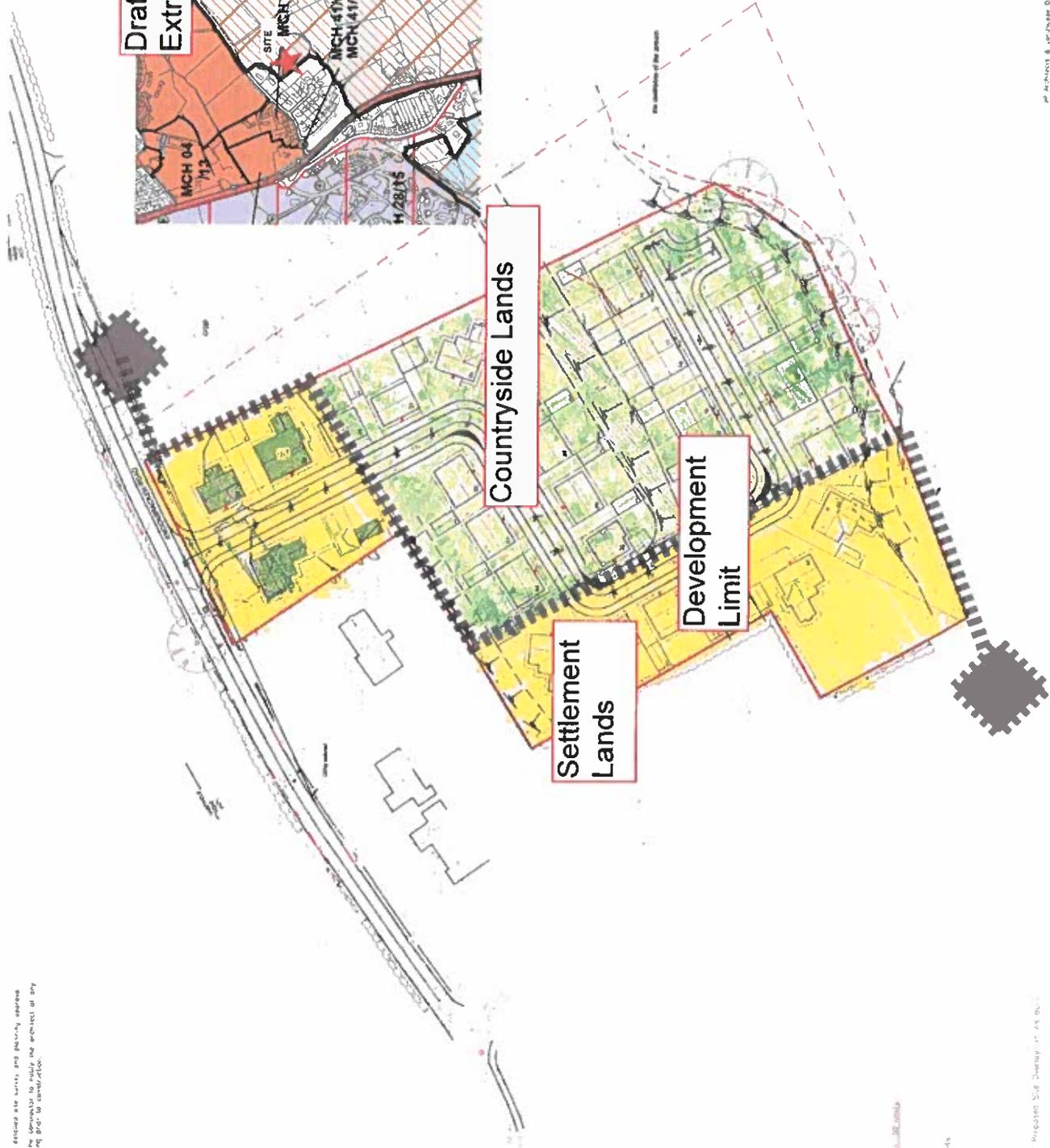
**Draft BMAP  
 Extract**



**Countryside Lands**

**Settlement  
 Lands**

**Development  
 Limit**



STANDARD DRAWING No. 001/001/001  
 20m Development Limit  
 10m Setback Development Limit



Scale: 1:500  
 Date: 2024

FOR INFORMATION ONLY 21/11/25

Project: Residential Development - Industrial Estate  
 Client: [Redacted]  
 Date: 21/11/25  
 Scale: 1:500  
 Drawing No: 001/001/001

