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9th January 2020

Local Development Plan Team Civic Headquarters Lagan Valley Island LISBURN BT27 4RL

Dear Sir / Madam

REPRESENTATION TO THE LISBURN AND CASTLEREAGH CITY COUNCIL LOCAL DEVELOPMENT PLAN DRAFT PLAN STRATEGY

I write on behalf of Castlereagh City Council Local Development Plan draft Plan Strategy.

It is considered that the draft Plan Strategy is Unsound. An oral representation is requested. This representation relates to Part 1 Plan Strategy – Chapter 4A – Enabling Sustainable Communities and Delivery of New Homes.

The representation relates to Soundness Tests CE1 'Does the Plan strategy set out a coherent strategy from which its policies and allocations logically flow?' and CE2 'Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded ona robust evidence base?'

Plan Objective A 4) states 'Support towns, villages and small settlements in the council area as vibrant and attractive centres providing homes and services appropriate to their role in the settlement hierarchy whilst protecting their identity from excessive development'. Plan Objective A 5) states 'Provide appropriate opportunities for housing in settlements with a range of types and tenures, including affordable housing'. These objectives are to be welcomed as they provide for housing opportunities in small settlements which, importantly, should offer a range of types and tenures as appropriate.

In contrast, Strategic Policy 08 Housing in Settlements states that the Plan will support development proposals that 'are in accordance with the Strategic Housing Allocation' which when reviewed indicates that there is unlikely to be any new housing allocations across the 13 villages and 33 small

Registered Office: Thompsons Solicitors 39 Frances Street, Newtownards Co. Down, 8123 7DW/ Company Number MI067536 settlements. This is neither coherent nor appropriate for small settlements, such as Lurganure, where there are no opportunities available for housing.

In relation to Lurganure, there is potential for housing growth to be accommodated in keeping with Plan Objective A on lands at Dagger Road, particularly at its junction with Moira Road. This land is ideally located in that it occupies one quarter of a crossroads with development already on the three other quarters. It would provide for a coherent and traditional settlement development pattern.

The Strategic Housing Allocation should be amended to provide for the identification of new housing allocations in small settlements in line with Plan Objective A.

Please do not hesitate to contact me if there is anything you wish to discuss in connection with this representation or if you wish to arrange a follow-up meeting.

Yours faithfully

for FM PLANNING LTD