



Local Development Plan 2032
Draft Plan Strategy
Representation Form

Please complete this representation form online and email to 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 10th 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:-

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

Part 2 –Operational Policies

xxx Operational Policy (Please State Individual Policy using Policy Reference e.g. HOU 1) SP 01-10, 18-19

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)

- 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.

Adequate account is not taken of the Regional Development Strategy, additional policy and guidance issued by the Department, and other relevant plans, policies and strategies relating to the council district and adjoining council districts.

The plan strategy does not adequately deal with cross boundary issues; certain strategies, policies and allocations; it is insufficiently focussed on developing the borough sustainably; and the monitoring and implementation framework may not be robust enough to deliver the borough’s sustainable potential in the way required by policy.

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.

Please 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

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 or telephone: 028 9244 7300.

Signature

Date

10.1.2020



The Dundonald Green Belt Association has the following concerns about the Draft Plan Strategy (the plan):

1. The plan makes no distinction between the Lisburn and Castlereagh wings of the borough, contrary to the RDS 2001 (p.62) which identifies Lisburn as an area of 'High Growth Potential for Housing and Employment Uses' and Castlereagh for 'Consolidation of Housing Role' and having 'Potential for Employment Growth'. The differing approaches required are expanded upon in RDS p.68 & 70. Lisburn-Castlereagh is now a single administrative entity but the differing approaches required to its component parts should be explicitly stated at high level in the plan.
2. The plan is insufficiently supportive of RDS policies RG6, RG7, RG8, SFG2, which seek community cohesion, urban renaissance, to promote more housing within existing urban areas, and to manage housing growth to achieve sustainable patterns of residential development, and to grow the population of the city of Belfast.
3. Plan policies do not properly enact SPPS guidance on sustainable housing delivery. The plan makes no reference to the 6.137 policy objective of reducing the use of greenfield land for housing. (This was in the Preferred Options Paper (POP) p.37, but has been removed from the Draft Strategy.) Its policies should be notably more ambitious in this area.
4. The plan does not sufficiently encourage compact town and village forms (SPPS 6.137), or 'promote' the brownfield site flow (SPPS 6.137 & 6.139) that makes compact forms possible.
5. It is unclear how the plan seeks to facilitate residential use above shops and other business premises as per SPPS 6.137. Clarification is sought as to whether a LOTS figure has been incorporated in plan numbers, and if so how this has been calculated.

6. The housing strategy appears to make no provision for phasing. Phasing is necessary for orderly development and to reduce consumption of greenfield land. A two phase housing release, consistent with the sequential approach set out in the SPPS (p.72), with the less sustainable greenfield sites going into the second phase, is required to assist the sustainable delivery of housing.
7. The proposed over-zoning is contrary to best practice. The RDS 2001 says this should occur to a 'maximum' of 10%, 'by exception' and as 'a contingency... in those situations where a land supply difficulty is likely to arise'. This is not the situation in Lisburn-Castlereagh, which has an ample supply of land. It will work against sustainable provision and the achievement of the 60% brownfield target and should go. More targeted ways of responding tactically to individual zoned sites which do not come forward should be found.
8. The plan should include a de-zoning option.
9. The plan's approach to social and affordable housing delivery lacks a serious operational dimension. It should include a requirement for social and affordable build in all major housing applications. The uses of Section 76 Planning Agreements (p.45) should be expanded to include delivering social housing. The import of the statement on meeting shortfalls by zoning of land for affordable housing (p.61) is unclear and of potential concern.
10. The plan's housing strategy makes insufficient use of one person, two person, three person, etc., household size data as a tool of analysis, and includes no assessment of the 'fit' between existing and required housing stock and the borough's household structure.
11. We support the use of the HGI as the basis for housing numbers but seek clarification of the relationship between the HGI and the 'baseline future growth' figure of 10,380 households over the plan period (p.58).
12. We endorse the Capacity Study's highlighting of the relationship between policy and windfall generation, and see windfall site flow levels as to a large extent an outcome of policy. However we would take issue with aspects of the study's approach, for example, we see small (1-4) windfall site numbers as, if anything, more policy susceptible than larger sites. We would also query the application of a 10% discount to trend based figures (plan p.64, Table 3; UCS 5.5), the apparent non-inclusion of larger windfall sites in the Housing Assessment Review (UCS 5.6.2), etc. While the policy background to the study notes regional guidance, it rests essentially on the policy position advanced in the POP.¹ As, in our view, this is not pro-active in the

¹ The UCS sees itself as 'policy neutral' (5.6.2 - 3). For the above reason we would see it as 'policy sub-optimal'.

way required by regional policy, and has not been pro-active historically (the borough has, over time, shown limited aspiration to work towards achieving the NI brownfield target²), the plan figures may significantly underestimate windfall potential and require revision.

13. The DPH figure used to inform plan numbers is unduly low and requires more differentiation. Using 120 for Lisburn City Centre and 25 across the rest of the urban area takes insufficient account of urban variation. The plan refers to 25-35 (p.60), however the UCS indicative yield figure advises 25 DPH has been applied (p.39, note 33). Writing over the existing 25 DPH (UCS 4.3), then, would not increase density without town cramming as directed by the RDS. It is noted that 25 is well beneath the 40 DPH required for efficient urban functioning.
14. The approach to housing in the countryside (p.65-66) appears insufficiently robust to manage rural commuter development pressures in the area immediately around Belfast and Lisburn.
15. Dundonald should be planned for as an entity, not as part of the Castlereagh Greater Urban Area. In the interests of good planning the two should be separated. Consideration of Dundonald's status as a town centre is bound up with this designation, and is a surely a matter for the strategic as opposed to the Local Policies Plan, as suggested in p.98.
16. The p.48 map shows two rural landscape wedges in Dundonald. In our view there is a strong case for uniting the Comber and Newtownards Rural Landscape Wedges (BMAP C5 & C6) to create a single rural wedge that will complete the eastern edge of the settlement of Dundonald in a way that respects its landscape setting and urban form. SP19 (a) and (b) would appear to offer a basis for this decision.
17. The site of Castle Reagh (Con O'Neill's castle) should be identified as a potential tourism asset (p.113).
18. The plan should set a context for additional tree planting over the period 2020-32, to increase tree coverage in a manner consistent with the PfG requirement that NI double its tree coverage by 2015. We could see no indication as to how this goal will be realised in the plan.
19. We welcome the plan's support for the future provision of strategic greenways (p.142) but believe it should also include a statement encouraging the development of additional local paths, cycle and walkways within the borough.

² This lack of aspiration is effectively 'quantified' in the POP's 16% urban footprint build aspiration.

20. The purpose to which the review mechanism will be put is unclear as is the extent to which it will allow for a flexible response to changing circumstances. We would like to see a review mechanism that is more obviously 'hands on' and is demonstrably robust enough to maximise the opportunities that will arise to increase the sustainability of the plan. (This will, for example explicitly state that windfall figures should be actively factored into plan numbers on an ongoing basis (SPPS 6.139), a practice that reinforces the case for phasing and is likely to increase the plan's ability to reduce the consumption of greenfield land.)

Dundonald Green Belt Association

10th January 2020