



## Local Development Plan 2032

### Counter Representation Form

Please complete this counter representation form 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 counter representations must be received no later than 5pm on Friday 17 April 2020.**

#### SECTION A: 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 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure (DfI) as they will be considered as part of the Independent Examination (IE) 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).

Counter representations will be treated in accordance with the **LDP privacy notice** which is available to view at [www.lisburncastlereagh.gov.uk/LDP](http://www.lisburncastlereagh.gov.uk/LDP) or is available on request by emailing [LDP@lisburncastlereagh.gov.uk](mailto:LDP@lisburncastlereagh.gov.uk).

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 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 counter representations will also be provided to DfI and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for IE. 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.

## SECTION B: 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 counter representations 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 counter 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 notice detailed in Section A.

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

**SECTION C:**

**Have you submitted a representation to the Council regarding this development plan document?**

Yes  No

**If yes, please provide your Reference Number DPS 030**

**SECTION D: YOUR COUNTER REPRESENTATION**

**In accordance with Regulation 18 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, any person may make a counter representation in relation to a representation seeking change to a Development Plan Document (DPD). The purpose of a counter representation is to provide an opportunity to respond to proposed changes to the DPD as a result of representations submitted under Regulation 16 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015.**

**A counter representation must not propose any further changes to a DPD.**

Please provide the reference number of the site-specific representation to which your counter representation relates. If you wish to make a counter representation to more than one representation, please complete a separate sheet for each counter representation you wish to make.

The attached letter provides general comment relating to the following representations:  
1, 11, 23, 25, 26, 27, 28, 33, 34, 35, 37, 38, 39, 40, 45, 47, 49, 50, 51, 52, 53, 54, 55, 56, 62, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 83, 85, 87, 88, 89, 91, 95, 97, 98, 100, 102, 104, 105, 106, 107, 108, 114, 115, 116, 117, 118, 119, 120, 122, 124, 127, 128

Your counter representation must relate to a site-specific representation made to the Lisburn & Castlereagh City Council draft Plan Strategy.

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the Department for Infrastructure’s Development Plan Practice Note 06 Soundness.

Please note your counter representation must not propose any new changes to the draft Plan Strategy. It should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission.

Please refer to attached letter dated 15<sup>th</sup> April 2020.

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

**Signature**

A rectangular box containing a solid black redaction, covering the signature area.

**Date**

15<sup>th</sup> April 2020

Thank you for your comments



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

Historic Environment Division  
 Klondyke Building  
 Cromac Avenue  
 Gasworks business Park  
 Malone Lower  
 BELFAST  
 BT7 2JA

Phone (direct line): (028) 90569840  
 (028) 90569717

email: [REDACTED]

Dear Sir / Madam,

15th April 2020

**RE: Historic Environment Division Counter Representation to representations received for Lisburn & Castlereagh City Council draft Plan Strategy (dPS)**

Historic Environment Division (HED) has reviewed the representations made to Lisburn & Castlereagh City Council and provides general comment in relation to the following representations:

1, 11, 23, 25, 26, 27, 28, 33, 34, 35, 37, 38, 39, 40, 45, 47, 49, 50, 51, 52, 53, 54, 55, 56, 62, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 83, 85, 87, 88, 89, 91, 95, 97, 98, 100, 102, 104, 105, 106, 107, 108, 114, 115, 116, 117, 118, 119, 120, 122, 124, 127, 128. (All prefixed by DPS)

The above listed representations all include site location maps identifying parcels of land for consideration as zoned development lands; residential or otherwise. Many of these sites have potential impacts on the historic environment, often with heritage assets (sometimes including statutorily designated assets) identified either within, adjacent to, or in proximity of, the site boundaries.

The PAC Procedures for '*Independent Examination of Local Development Plans*' Version 2 December 2019, however notes that '*...the Commissioner's report will be on the **soundness** of the plan and not on individual representations or sites. This represents a fundamental change from the development plan system that existed before the 2011 Planning Act came into force.*' (para 12).

Taking into account the 'soundness' requirements of **Consistency Test (C3)** and **Coherence and effectiveness test (CE2)** HED considers the proposed zoning of sites in these representations to be premature at this stage of the local development plan process and more appropriately assessed at the Local Policies Plan (LPP) stage, in response to Council

proposals, based on robust evidence. HED has therefore reserved comment on the potential impacts of site specific land zonings on affected heritage assets until this stage, also mindful of the potential for changing circumstances within the LPP development timeframe.

In preparation of the LPP, Councils, when considering the site specific lands uses, must ensure that proposals are founded on a robust assessment of the historic environment evidence base to inform land zonings for development. Councils must also demonstrate how this has been taken into account, and how it has been utilised to inform potential forms of mitigation such as appropriate designation or other appropriate key site requirements e.g. for evaluation and identification, of previously unidentified archaeological remains.

The above comments are made toward ensuring that land zoning is carried out in accordance with the requirements of **soundness** under the **Consistency Test (C3)** and **Coherence and Effectiveness Test (CE2)**.

Note: HED encourages the Council to review the format of public representations to improve user needs; i.e.

- a. Filtering representations by topic heading and/ or relevant sections from the draft Plan Strategy to which they were responding; and
- b. Digital word searching of the scanned PDF representations.

Improvements in these areas would provide a more efficient filter facility, saving time and enabling targeted searches, pertinent to topic interest.

HED has welcomed the positive engagement with the Council in preparation of the draft Plan Strategy and looks forward to further liaison in preparation of its Local Policies Plan.

Yours sincerely,



  
Senior Architect



  
Senior Archaeologist

### Heritage Records & Designations Branch

Cc   
