

Local Development Plan 2032 Consultation Survey

Section A- Data Protection And Consent

Q1. DATA PROTECTION AND CONSENT

I confirm that I have read and understand the Privacy Notice above and I give my consent for Lisburn & Castlereagh City Council to hold my personal data for the purposes outlined. (Required)

Section B- Your Details

Q2. Please specify the capacity in which you are responding by ticking one of the following boxes. If you are responding as a planning consultant, agent or representing an organisation you will be the main point of contact for your client or organisation

Planning Consultant/ Agent

Q3. Your Details

Name	Les Ross
Details of Organisation/ Body	Les Ross Planning
Address	9a Clare Lane
Postcode	BT80 8RJ
Email Address	lross@rossplanning.co.uk
Phone Number	02886764800

Consent to Publish Response

Q4. 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 Notice detailed in Section A.

Please publish with my name and organisation

Section C: Your Representation

Q5. 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.

I believe it to be UNSOUND

Q6. If you have any additional information to upload in order to explain your SOUND views please do so

No Response

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

Q7. PLEASE SELECT ONLY ONE ISSUE IN EITHER PART 1 (CHAPTER 1 TO 5) OR PART 2 (OPERATIONAL POLICY)

Chapter 4A- Enabling Sustainable Communities and Delivery of New Homes

Soundness Test No:

Q8. 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)

CE1 Does the Plan Strategy set out a coherent strategy from which its policies and allocations logically flow and 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?

CE4 Is the Plan 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 additional space is required please upload by clicking below.

Strategic Housing Allocation

The Plan Strategy earmarks Blaris as the location for all future housing expansion and states at page 61, (7.):

'The strategic housing allocation presented in Table 3 negates the need to provide any greenfield extension to allow for future housing growth.'

This approach is incoherent as it predetermines the process of the second stage of the plan process without an opportunity to scrutinise the Blaris opportunity against other expansion opportunities. While it may be appropriate for the Plan Strategy to indicate the desirability of growth at Blaris, the land-use balance and phasing of development in this location are matters to be considered through stage two of the Plan making process, alongside a consideration of alternative expansion opportunities around Lisburn and elsewhere.

The exclusive focus of growth at Blaris is unsustainable for the following reasons:

1. There is no guarantee the Blaris scheme will started or completed during the Plan period.
2. The Blaris developer would assume a monopoly position in terms of housing and economic growth.
3. The Plan process has failed to properly consider the Blaris opportunity in the context of other growth opportunities.

MODIFICATIONS

Q9. 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 be as precise as possible. If additional space is required please upload your information by clicking below.

The Plan Strategy should not specify Blaris as the exclusive location for future urban expansion.

Q10. If you have additional information to upload please do so here

No Response

Q11. If you wish to submit further information please click below:

I wish to submit a further representation

PLAN COMPONENT

Q12. PLEASE SELECT ONLY ONE ISSUE IN EITHER PART 1 (CHAPTER 1 TO 5) OR PART 2 (OPERATIONAL POLICY)

Chapter 4B- Driving Sustainable Economic Growth

Policy Reference

SMU01 West Lisburn/Blaris

Soundness Test No:

Q13. 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)

CE1 Does the Plan Strategy set out a coherent strategy from which its policies and allocations logically flow and 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?

CE4 Is the Plan 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 additional space is required please upload by clicking below.

Strategic Employment Allocations - SMU01 & SMU02
 The Plan Strategy defines Blaris and Purdysburn as the main locations for all future economic expansion. This represents an over-reliance on these sites and limits the opportunity to for balanced geographical spread of sites across the Plan area.
 This approach is incoherent as it predetermines the process of the second stage of the plan process without an opportunity to scrutinise these opportunity against other expansion opportunities. While it may be appropriate for the Plan Strategy to indicate the desirability of growth at such locations, the detail of any zonings at these location are matters to be considered through stage two of the Plan making process, alongside a consideration of alternative expansion opportunities elsewhere.
 The exclusive focus of growth at these locations is unsustainable.

MODIFICATIONS

Q14. 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 be as precise as possible. If additional space is required please upload by clicking below.

Policies SMU01 and SMU02 should be removed from the Plan Strategy.

Q15. If you have additional information to upload please do so here

No Response

Q16. If you wish to submit further information please click below:

I wish to submit a further representation

PLAN COMPONENT

Q17. PLEASE SELECT ONLY ONE ISSUE IN EITHER PART 1 (CHAPTER 1 TO 5) OR PART 2 (OPERATIONAL POLICY)

No Response

Soundness Test No:

Q18. 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)

No Response

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 additional space is required please upload by clicking below.

No Response

Modifications

Q19. 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 be as precise as possible. If additional space is required please upload by clicking below.

No Response

Q20. If you wish to submit further representations you will need to complete a new questionnaire

No Response

SECTION C: DEALING WITH YOUR REPRESENTATION

Q21. INDEPENDENT EXAMINATION Please indicate how you would like your representation to be dealt with. 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.

Oral Representation