



Local Development Plan 2032

Draft Plan Strategy

Counter Representation Report

December 2020

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1.0 INTRODUCTION

- 1.1 This report comprises a record of the counter representations received by Lisburn & Castlereagh City Council in relation to its draft Plan Strategy, in accordance with the Planning (Local Development Plan) Regulations (NI) 2015 and the Council's Statement of Community Involvement (SCI).
- 1.2 It provides a summary of the key issues raised in each counter representation and should be read in conjunction with the full Public Consultation Report on representations received to the draft Plan Strategy and its supporting documents.
- 1.2 The information included in this report, and copies of all representations and counter representations received in response to the consultation process, form part of the assessment of soundness of the draft Plan Strategy.

2.0 COUNTER REPRESENTATION PROCESS

- 2.1 Lisburn & Castlereagh City Council published its draft Plan Strategy and accompanying supporting documents for formal consultation on Friday 8 November 2019, for a nine week period which concluded on Friday 10 January 2020. This followed a period of informal 'Pre-Consultation' which ran from Friday 11 October until Thursday 7 November 2019.
- 2.2 In accordance with Regulation 17 of the Planning (LDP) Regulations (NI) 2015 a copy of all representations received during the public consultation period were made available for inspection at the Council offices and on the Council's website on Friday 21 February 2020.
- 2.3 The period for submission of a counter representation was to close at 5pm on Friday 17 April 2020. Due to the Council offices being closed to comply with the Health Protection (Coronavirus Restrictions) Regulations 2020 from 23 March 2020, the period for receipt of counter representations was kept open in order to fully comply with Regulation 18 of the Planning (LDP) Regulations (NI) 2015. The Civic Headquarters reopened to the public on Monday 27 July 2020 and the Council advised, through a notice on its website, that from Monday 27 July 2020 anyone seeking to inspect the submitted representations to the draft Plan Strategy could make an appointment to do so during normal working hours (9am-5pm) at the Civic Headquarters, Lagan Valley Island.
- 2.4 The formal closing date for submission of a counter representation to the draft Plan Strategy was indicated to be 5pm on Tuesday 1 September 2020. This revised closing date took account of the period when the Civic Headquarters were closed to the general public as a result of the COVID 19 emergency.
- 2.5 In accordance with Regulation 18 of the Planning (LDP) Regulations (NI) 2015, counter representations could be made to any site-specific policy representation. A "*site specific policy*" as defined in legislation, means a policy in a development plan document which identifies a site for a particular use or development. A "*site specific policy representation*" means any representation which seeks to change a development plan document by adding a site specific policy to the development plan document; or altering or deleting any site specific policy in the development plan document.
- 2.6 Counter representations must relate to a site-specific policy representation and must not propose any change to the draft Plan Strategy document. This is referenced to in the

Department's Development Plan Practice Note 9: Submission and Handling of Representations.

3.0 COUNTER REPRESENTATIONS RECEIVED

- 3.1 A list of the counter representations received to the draft Plan Strategy is included in Appendix A.
- 3.2 In total, there were 38 individual counter representations received via:
- Smart Survey (7);
 - Email including the online form (31).
- 3.3 Of the 38 counter representations received, 26 of the parties making the counter representations had previously made a representation to the draft Plan Strategy.
- 3.3 The counter representations are linked to 77 representations and a number of the parties made multiple counter representations (for example at CR-004 Historic Environment Division make reference to 65 individual representations). These are referenced individually for ease of reference and clarity.
- 3.4 One counter representation specifically supported a representation to the draft Plan Strategy and in accordance with the LDP Regulations it has not been considered. Eleven other counter representations are not considered by the Council to comply with the definition of a counter representation as set out in Regulation 18 of the LDP Regulations. These are identified in the Council's consideration of the counter representations at Section 4.0.
- 3.5 This approach is in accordance with the Planning (LDP) Regulations (NI) 2015 having had regard to the supplementary advice set out in Development Plan Practice Note 09: Submission and Handling of Representations.

4.0 SUMMARY AND ANALYSIS OF COUNTER REPRESENTATIONS

- 4.1 A summary is provided in the table below of the counter representations received as part of the consultation process providing a brief analysis of the information presented in the counter representations.
- 4.2 It should be noted however that the detail as presented is considered to be matters for the Independent Examination in accordance with PAC Guidance as outlined in the PAC Procedures for 'Independent Examination of Local Development Plans' Version 2 December 2019.
- 4.2 Furthermore, the Council has provided its consideration as to which counter representations meet the relevant definition set out within Regulation 18 of the LDP Regulations (see paragraph 2.5). This is detailed in the summary table below.
- 4.3 The Council considers that only 26 of the 38 submitted counter representations meet the relevant definition set out within Regulation 18.

Summary of Counter Representations

Counter Rep	Rep	Main Issue(s) Raised	Council Consideration
CR-001 – Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)	DPS-001	<p>This counter representation states that DPS-001 is unsound in respect of Conformity Test C3.</p> <p>They indicate that the site specific representation is in breach of, RG9 & RG11 of the RDS; paragraphs 6.191 – 6.198 of the SPPS; paragraph 4.3 and Policy NH5 of PPS2; and the Biodiversity Strategy for Northern Ireland to 2020 and Biodiversity Duty Guidelines.</p> <p>Counter representation CR-001 states that the proposed site location on the Barnfield Road (and accompanying site Location Plan MPS001-A and 001-B) includes part of Hull’s Glen SLNCI and that no account of LLPA MN07.</p>	<p>This is considered to be a counter representation as it relates to a site specific representation. The counter representation challenges submission DPS-001 on the grounds of soundness (C3) and includes supporting information.</p>
CR-002 – Individual	DPS-035	<p>This counter representation refers to representation DPS-035 and the accompanying site location plan MPS-035B (Drumbeg) and states:</p> <ul style="list-style-type: none"> • This is a green field site, brown field land should be developed first; • This is in an area designated as one of Natural Beauty; • Infrastructure issues, transport, sewage and other services not at level to support such development; and • Access to the site is via a narrow country road and untenable. <p>This counter representation also refers to the accompanying site location plan MPS-035C (Ballyskeagh) and states:</p> <ul style="list-style-type: none"> • This is a green field site, brown field land should be developed first; • This is an area designated as one of Natural Beauty; • Ballyskeagh is a Hamlet; • Infrastructure issues, transport, sewage and other services not at level to support such development; and • Part of area proposed is in a flood plain 	<p>This is considered to be a counter representation as it relates to a site specific representation. The counter representation does not refer to a soundness test but includes supporting information to rebut representation DPS-035 and site location plans MPS-035B and MPS-035C.</p>
CR-003 – Individual	DPS-023	<p>This counter representation refers to representation DPS-023 and accompanying site location plan MPS-023 (Drumbeg West) and states:</p> <ul style="list-style-type: none"> • This is a green field site, brown field land should be developed first; 	<p>This is considered to be a counter representation as it is relates to a site specific representation.</p>

		<ul style="list-style-type: none"> • This is an area designated as one of Natural Beauty; • Drumbeg is a Hamlet without the transport infrastructure necessitated by this site, nor safe access from a narrow country road; and • Infrastructure issues, increased demand on sewage and electricity; currently no gas provision. 	The counter representation does not refer to a soundness test but includes supporting information to rebut DPS-023.
CR-004 – Department for Communities, Historic Environment Division (HED)	DPS-001, 011, 023, 025, 026, 027, 028, 033, 034, 035, 037, 038, 039, 040, 045, 047, 049, 050, 051, 052, 053, 054, 055, 056, 062, 067, 068, 069, 070, 071, 072, 073, 074, 075, 076, 077, 078, 079, 083, 085, 087, 088, 089, 091, 095, 097, 098, 100, 102, 104, 105, 106, 107, 108, 114, 115, 116, 117, 118, 119, 120, 122, 124, 127, 128	<p>This counter representation lists 65 representations all of which include site location maps identifying parcels of land for consideration to be zoned as development lands, predominantly residential. They state that 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.</p> <p>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.</p> <p>HED has therefore reserved comment on the potential impacts of site specific land zonings on impacted heritage assets.</p>	This is considered to be a counter representation as it relates to a number of site specific representations. The counter representation challenges each representation on the grounds of soundness (C3 and CE2).
CR-005 – Clyde Shanks Ltd	DPS-017	<p>This counter representation states that DPS-017 seeks to remove policy SMU01 from the dPS.</p> <p>CR-005 contends: Unequivocally, the expansion of lands at Blaris has the potential to realise the co-location of strategic employment and housing land whilst delivering vital new infrastructure to enhance public transport connectivity, easing movement of freight links from the north and north west of the city to the A1/M1 key transport routes, reducing congestion in and around the</p>	This is considered to be a counter representation as it relates to the identified strategic site (SMU01) in the draft Plan Strategy. The counter representation does not refer to a

		city and offering the opportunity to live and work in a quality environment is sound.	soundness test but includes supporting information to rebut the suggested modification proposed to DPS-017.
CR-006 – Gravis Planning	DPS-012; DPS–090; DPS-093	<p>This counter representation states that whilst SP07 is a strategic policy, it is too broad and does not set out robust evidence or methodologies for how planning agreements will be used. Furthermore, they suggest that appropriate guidance should be published in relation to when a planning obligation should be used, including appropriate tests.</p> <p>They disagree with NIHE support, specifically to the inclusion of affordable housing within the policy. They consider that Section 76 agreements are unduly onerous, time consuming to put in place and therefore increase the timelines involved in the delivery of affordable housing.</p> <p>It is indicated that Strategic Policy 07 (SP07) is not sound as it is not reasonably flexible to enable it to deal with changing circumstances and it is not based on a robust evidence base (Test CE2). The proposed remedy is to revise SP07 to remove affordable housing and include policy tests for when planning obligations should be used. It is further indicated that Supplementary Planning Guidance be published so that financial contributions can be suitably quantified if necessary.</p> <p>In respect of DPS-012 in relation to HOU4 it is indicated that they disagree with NIHE support for the policy. The policy will apply more to new dwellings provided through the private sector as the requirement for Housing Associations to build to the Lifetime Home standards has applied in Northern Ireland since 1998 and is set out in the DfC Housing Association Guide (HAG).</p> <p>It is indicated that policy HOU4 is not sound as it is not based on a robust evidence base (Test CE2) and at the planning stage, mechanisms for monitoring of building to the lifetime homes standard is not clear (Test CE3).</p>	<p>This is not considered to be a counter representation as it does not relate to site specific representations. The counter representation makes reference to Strategic Policies SP07 (Section 76 Planning Agreements) and SP08 (Housing in Settlements); operational policies HOU4 (New Design in Residential Development) and HOU10 (Affordable Housing in Settlements). It challenges each representation on specific soundness tests (CE2, 3 and 4), and suggests remedies.</p>

		<p>The proposed remedy is to revise HOU4 to remove reference to density bands; remove lifetime homes as a planning requirement and ensure it is brought forward under the authority of Building Regulations.</p> <p>In relation to HOU10 it is indicated that they disagree with NIHE support of the threshold as set out in HOU10. Whilst they support the delivery of affordable homes in the Council Area, they suggest that a similar policy to that used in the Northern Area Plan 2016 is adopted (i.e. provision of social housing directly linked to an identifying need).</p> <p>It is indicated that Policy HOU10 is not sound as it is not reasonably flexible to enable it to deal with changing circumstances (Test CE4) and it is not based on a robust evidence base (Test CE2).</p> <p>The proposed remedy is to revise HOU10 so that affordable homes provision is only required on 'major residential development' that comprises 50 units or more, sites of 1ha or more and/or where there is an identified level of need in agreement with NIHE.</p> <p>In respect of DPS-012, DPS-090 and SP08 Housing in Settlements it is indicated that they disagree with the proposed Strategic Housing Allocation figures set out within Table 3. They consider that a greater allocation is required to that proposed within the draft plan strategy in order to meet housing need. Not zoning sufficient land is unreasonable as the ongoing lack of housing supply in the Council area is at odds with the RDS and the SPPS which seeks to support towns, villages and rural communities to maximise their potential.</p> <p>It is indicated that Strategic Policy 08 (SP08) is not sound as it is not reasonably flexible to enable it to deal with changing circumstances i.e. unexpected growth (Test CE4) and it is not based on a robust evidence base (Test CE2). The projected housing growth underestimates the housing need for the district over the plan period, as detailed above.</p>	
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		The proposed remedy is to revise SP08 to update the housing growth figure to provide 22,312 new homes within the district by 2032.	
CR-007 – Gravis Planning	DPS-012; DPS-090; DPS-093	Identical counter representation to CR-006.	This is not considered to be a counter representation for reasons outlined above.
CR-008 – Gravis Planning	DPS-012; DPS-090; DPS-093	Identical counter representation to CR-006 and CR-007.	This is not considered to be a counter representation for reasons outlined above.
CR-009 – Individual	DPS-089	<p>This counter representation states there is a clear error in DPS-089 which supports the Lisburn and Castlereagh land availability figures for Dundonald. It is stated that the housing figures in the table provided in the representation as part of their housing land availability review are incorrect. The most obvious error relates to Site Ref 2 did not reference pending planning approval at the Comber Road which increased the capacity to 667 units representing an uplift in 181 units. It also does not take into account an area of approximately 6 hectares of land within MCH08/12 known as Phase2b on the Article 40 Agreement Millmount Concept Masterplan which has not been developed and which cannot be developed until the Spine Road is complete. This would represent an additional yield of 150 to 210 units. Therefore within Site Reference 2 alone there is a potential 331 to 391 units not included in any housing land supply figures.</p> <p>They therefore feel that this representation is incorrect and provides evidence that there is sufficient existing housing land availability within Dundonald and that Housing Policy within the Plan is correct.</p> <p>Other specific issues raised in relation to the site identified at MPS-089A (Greengraves) include the unsuitability of the land on the grounds of amenity value; local character; current designation located within a landscape wedge; site access and built and natural heritage concerns. The recommendations of the PAC report as quoted are refuted as time and circumstances in the surrounding area have changed.</p>	This is considered to be a counter representation as it relates to a site specific representation. The counter representation does not refer to a soundness test but includes supporting information to rebut DPS-089.

CR-010 – One2One Planning Ltd	DPS-063	This counter representation asserts that the requested change proposed in DPS-063 (relating to lands at Feumore Road) fails the test of soundness, having regard to the necessary tests referenced in DPPN 6. They rebut assertions made in representation DPS-063 that the Plan is unsound and unsustainable with the inclusion of these lands within the SDL of Feumore. Additional detailed information is provided to support this counter representation.	This is considered to be a counter representation as it relates to a site specific representation. The counter representation challenges the representation on the grounds of soundness (C1 and C3). It also notes soundness tests CE2 and CE3.
CR-011 – Individual	DPS-089	This counter representation refers to the site identified on MPS-089A (Greengraves). It states that the lands in the representation are owned by the individual not Fraser Homes Ltd. It also confirms that no correspondence from Fraser Homes Ltd or their advisors regarding the DPD representation had been received and there is no agreement between the individual and Fraser Homes Ltd.	This is not considered to be a counter representation as it is simply a statement relating to the ownership of the site in question.
CR-012 – Individual	DPS-035	This counter representation indicates that the site as identified in DPS-035 and accompanying site location plan MPS-035C (Ballyskeagh) is unsuitable for housing for the following reasons: <ul style="list-style-type: none"> • It is with the Lagan Valley Regional Park and an area of outstanding beauty; • Pollution concerns to nearby underground well used for commercial purposes; • Traffic and air pollution concerns from development; • Infrastructure concerns; and • The site should be left as farming land. 	This is considered to be a counter representation as it relates to a site specific representation. The counter representation does not refer to a soundness test but includes supporting information to rebut DPS-035 (MPS-035C).
CR-013 – Individual	DPS-035	This counter representation indicates the site identified in DPS-035 and accompanying site location plan MPS-035C (Ballyskeagh), the proposed joining of Nevin's Row and Sandymount, would be to the detriment of the local area and environment for the following reasons: <ul style="list-style-type: none"> • Historical, environmental and conservation concerns; • Area is within the Lagan Valley Regional Park; • The area requested to be rezoned for housing is farmland and would be out of keeping with the surrounding countryside; 	This is considered to be a counter representation as it relates to a site specific representation. The counter representation does not refer to a soundness test but includes supporting information to

		<ul style="list-style-type: none"> • Flooding and infrastructure issues; • would not be capable of supporting any new development; and • The area is rich in wildlife. <p>Any new development would have a detrimental effect on the local ecosystem.</p>	rebutDPS-035 (MPS-035C).
CR-014 – Individual	DPS-035	<p>This counter representation identified in DPS-035 and accompanying site location plan MPS-035C (Ballyskeagh) indicates that:</p> <ul style="list-style-type: none"> • New development would have a detrimental effect on the ecosystem and infrastructure of the surrounding area; • Built historical concerns; the farmhouse on the land that is in the proposed development site dates back to the 1830's and is considered to be a locally significant building; • Archaeological concerns; • Concerns for Wildlife within the Lagan Valley Regional Park and area of outstanding natural beauty; and • That the coalescence between the two nodes would be undesirable and damaging. 	This is considered to be a counter representation as it relates to a site specific representation. The counter representation does not refer to a soundness test but includes supporting information to rebutDPS-035 (MPS-035C).
CR-015 – Jonathan Bradshaw	DPS-090	This counter representation is supportive of DPS-090.	This is not considered to be a counter representation as it is in support of the representation only.
CR-016 – One2One Planning	DPS-001	<p>Whilst this counter representation supports additional housing, the following site specific issues with DPS-001 are raised:</p> <ul style="list-style-type: none"> • The sites abut but extend beyond the Settlement Development Limit (other than No 7 Barnfield Road) and are recognised to be within Local Landscape Policy Area MN07; • Other portions of the site are partly within lands designated as Hulls Glen site of local nature conservation importance (SLNCI); • Access issues, generating significant traffic. <p>It is indicated that the requested change identified introduces a significant scale of housing for Milltown village and fails the test of soundness under C3 in that it is inconsistent with the sustainability principles of the SPPS and CE2 in that the requested inclusion is neither realistic or an alternative based on evidence.</p>	This is considered to be a counter representation as it relates to a site specific representation. The counter representation challenges the representation on the grounds of soundness (C3 and CE2) and provides supporting information.
CR-017 – One2One Planning Ltd	DPS-034	This counter representation is supportive in principle of DPS-034 but requests a further	This is not considered to be a counter

		extension to the boundary of the Settlement Development Limit of Lisburn	representation. Counter representations proposing alternative sites or proposing any other changes to DPD are not to be considered.
CR-018 – One2One Planning Ltd	DPS-054	<p>Whilst this counter representation supports the overall thrust of DPS-054, the following site specific issues with DPS-054 (Milltown) are raised:</p> <ul style="list-style-type: none"> • The land suggested for inclusion within the SDL is not considered to be the best option for modest housing development to meet a local needs; • Inclusion would undermine the integrity of the landscape wedge to the eastern side of Milltown Village; • Site is within a Local Landscape Policy Area; • Character of the village is threatened and could lead to urban coalescence; and • Loss of trees, impacting on the character of the area and loss of nature conservation interest. <p>It is indicated that the test of soundness under C3 is not met in that it is inconsistent with the sustainability principles of the SPPS and CE2 in that the requested inclusion is neither realistic nor an alternative based in evidence.</p>	This is considered to be a counter representation as it relates to a site specific representation. The counter representation challenges the representation on the grounds of soundness (C3 and CE2) and provides supporting information.
CR-019 – One2One Planning Ltd	DPS-118	<p>This counter representation makes reference to the need for controlled growth around the village of Milltown, the following site specific issues with MPS-0118 (Milltown East of River) are raised:</p> <ul style="list-style-type: none"> • Disagrees that the proposed extension as set out is the most appropriate location for growth in the locality; • They suggest the land is elevated in nature and located in a Local Landscape Policy Area (MN06); and • There are also industrial heritage concerns to the eastern side of Milltown. <p>It is indicated that the character of the village is threatened and could lead to urban coalescence.</p>	This is considered to be a counter representation as it relates to a site specific representation. The counter representation does not refer to a soundness test but includes supporting information to rebut DPS-118.
CR-020 – Department of Agriculture, Environment and Rural Affairs,	DPS-035	<p>This counter representation considers DPS-035 is unsound in respect of Conformity Test C3. They indicate that the site specific representation is in breach of, RG9 & RG11 of the RDS; paragraphs 6.191 – 6.198 of the SPPS; and Policy NH5 of PPS2; and the Biodiversity Strategy for</p>	This is considered to be a counter representation as it relates to a site specific representation.

Northern Ireland Environment Agency (NIEA)		Northern Ireland to 2020 and Biodiversity Duty Guidelines The counter representation states that the proposed site contains part of Killynure SLNCI.	The counter representation challenges the representation on the grounds of soundness (C3) and includes supporting information.
CR-021 – Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)	DPS-085	This counter representation considers DPS-085 is unsound in respect of Conformity Test C3. They indicate that the site specific representation is in breach of, RG9 & RG11 of the RDS; paragraphs 6.191 – 6.198 of the SPPS; and Policy NH5 of PPS2; and the Biodiversity Strategy for Northern Ireland to 2020 and Biodiversity Duty Guidelines. The counter representation states that the proposed site lies within an Area of Special Scientific Interest (ASSI) for breeding Lapwing Vanellus. It is noted that discussions have been held in relation to development on the site and mitigation measures are included in the response.	This is considered to be a counter representation as it relates to a site specific representation. The counter representation challenges the representation on the grounds of soundness (C1) and includes supporting information.
CR-022 - Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)	DPS-118	This counter representation considers DPS-118 is unsound in respect of Conformity Test C3. They indicate that the site specific representation is in breach of, RG9 & RG11 of the RDS; paragraphs 6.191 – 6.198 of the SPPS; and Policy NH5 of PPS2; and the Biodiversity Strategy for Northern Ireland to 2020 and Biodiversity Duty Guidelines. The counter representation states that the proposed site includes part of Derriaghy Glen SLNCI, is within a Local Landscape Policy Area and takes no account of ecological connectivity between the river corridors to the east and west sides of the site.	This is considered to be a counter representation as it relates to a site specific representation. The counter representation challenges the representation on the grounds of soundness (C1) and includes supporting information.
CR-023 – Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)	DPS-128	This counter representation considers DPS-128 is unsound in respect of Conformity Test C3. They indicate that the site specific representation is in breach of, RG9 & RG11 of the RDS; paragraphs 6.191 – 6.198 of the SPPS; and Policy NH5 of PPS2; and the Biodiversity Strategy for Northern Ireland to 2020 and Biodiversity Duty Guidelines. The counter representation states that the proposed site at Dunlady Glen contains the southern part of Craigantlet Woods SLNCIs and is within MCH33 Local Landscape Policy Area, Dunlady Glen; there is natural vegetation on the	This is considered to be a counter representation as it relates to a site specific representation. The counter representation challenges the representation on the grounds of soundness (C1) and

		southern boundary and an internal linear hedgeline / trees / watercourses. Whilst not opposed in principle to development within SDL, careful consideration needs to be given to the biodiversity value of this site.	includes supporting information.
CR-024 – Clyde Shanks Ltd	DPS-025	This counter representation states that DPS-025 considers housing delivery at Blaris is a long term option. CR-024 contends: Unequivocally, the expansion of lands at Blaris in realising the co-location of strategic employment and housing lands and delivering vital new infrastructure to enhance public transport connectivity, easing movement of freight, linking the north and north west of the city to the A1/M1 key transport routes, providing opportunity for a future link to the regionally important MLK lands, reducing congestion in and around the city and offering the opportunity to live and work in a quality environment is sound.	This is not considered to be a counter representation as it does not object to the lands identified in the site specific representation; rather it objects to assertions contained within DPS-025 in relation to housing provision at West Lisburn/Blaris (see SMU01).
CR-025 – Clyde Shanks Ltd	DPS-034	This counter representation states that DPS-034 considers housing delivery at Blaris is a long term option. CR-025 contends: Unequivocally, the expansion of lands at Blaris in realising the co-location of strategic employment and housing lands and delivering vital new infrastructure to enhance public transport connectivity, easing movement of freight, linking the north and north west of the city to the A1/M1 key transport routes, providing opportunity for a future link to the regionally important MLK lands, reducing congestion in and around the city and offering the opportunity to live and work in a quality environment is sound.	This is not considered to be a counter representation as it does not object to the lands identified in the site specific representation; rather it objects to assertions contained within DPS-034 in relation to housing provision at West Lisburn/Blaris (see SMU01).
CR-026 – Clyde Shanks Ltd	DPS-039	This counter representation states that DPS-039 suggests Blaris should be retained solely for large scale employment purposes. CR-026 contends: Unequivocally, the expansion of lands at Blaris in realising the co-location of strategic employment and housing lands and delivering vital new infrastructure to enhance public transport connectivity, easing movement of freight, linking the north and north west of the city to the A1/M1 key transport routes, providing opportunity for a future link to the regionally important MLK lands, reducing congestion in and around the city and offering the opportunity to live and work in a quality environment is sound.	This is not considered to be a counter representation as it does not object to the lands identified in the site specific representation; rather it objects to assertions contained within DPS-039 in relation to the reduction of employment lands

			at West Lisburn/Blaris (see SMU01).
CR-027 – Clyde Shanks Ltd	DPS-041	<p>This counter representation states that DPS-041 suggests Blaris is unsustainable greenfield land and is not a highly accessible location; and suggests its identification as a strategic mixed use site runs counter to regional policies for transportation and land use planning.</p> <p>CR-027 contends: Unequivocally, the expansion of lands at Blaris in realising the co-location of strategic employment and housing lands and delivering vital new infrastructure to enhance public transport connectivity, easing movement of freight, linking the north and north west of the city to the A1/M1 key transport routes, providing opportunity for a future link to the regionally important MLK lands, reducing congestion in and around the city and offering the opportunity to live and work in a quality environment is sound. The employment zoning at Blaris has not ‘underachieved’ since first identified in draft BMAP in 2004. It has not delivered at all. Key to delivery of this major urban expansion, as has been proven in successful examples of this scale of strategic growth elsewhere in these islands, is a sustainable mix of uses that can generate value in the lands to fund the necessary upfront infrastructure of the M1-Knockmore link road. Policy encourages integration of such major mixed use land use to achieve sustainability. That should occur where there are sustainable transport linkages as is evidently the case at Blaris.</p>	<p>This is considered to be a counter representation as it relates to the identified strategic site (SMU01) in the draft Plan Strategy. The counter representation does not refer to a soundness test but includes supporting information to rebut DPS-041.</p>
CR-028 – Clyde Shanks Ltd	DPS-084	<p>This counter representation states that DPS-084 suggests it is unclear why Blaris has attracted a housing allocation which is contrary to SPPS/RDS direction.</p> <p>CR-028 contends: Unequivocally, the expansion of lands at Blaris in realising the co-location of strategic employment and housing lands, delivering vital and long planned new infrastructure (M1-Knockmore link road) to enhance public transport connectivity, easing movement of freight to established employment areas, linking the north and north west of the city to the A1/M1 key transport routes, providing opportunity for a future link to the regionally important MLK lands, facilitating substantially expanded Park and Ride facilities, introducing circular bus services to connect with the wider</p>	<p>This is considered to be a counter representation as it relates to the identified strategic site (SMU01) in the draft Plan Strategy. The counter representation does not refer to a soundness test but includes supporting information to rebut DPS-084.</p>

		<p>city and specifically to a future planned rail halt, reducing congestion in and around the city and offering the opportunity to live and work in a quality environment with connections to a new riverside parkland landscape is sound.</p> <p>The employment zoning at Blaris has not ‘underachieved’ since first identified in draft BMAP in 2004. It has not delivered at all.</p> <p>Key to delivery of this major urban expansion, as has been proven in successful examples of this scale of strategic growth elsewhere in these islands, is a sustainable mix of uses that can generate value in the lands to fund the necessary upfront infrastructure of the M1-Knockmore link road. Policy encourages integration of such major mixed use land use to achieve sustainability. That should occur where there are sustainable transport linkages as is evidently the case at Blaris.</p>	
CR-029 – Clyde Shanks Ltd	DPS-095	<p>This counter representation states that DPS-025 suggests housing delivery at Blaris is a long term option.</p> <p>CR-029 contends: The Plan Strategy should be flexible both in terms of its Plan period and also in assessing realistic levels of housing contribution that lands at Blaris may make during that plan period.</p> <p>Estimates are provided within the counter representation in relation to potential delivery of the site that would deliver in the range of 770-950 units by 2032. Rolling forward on same basis to 2035 would see 1010-1250 units; looking to 2037 the output would be 1170-1450.</p> <p>The counter representation welcomes the representation submitted by Turleys and its endorsement that the principle of strategic mixed use development at Blaris is sound reflecting its highly sustainable credentials.</p>	<p>This is not considered to be a counter representation as it does not object to the lands identified in the site specific representation; rather it objects to assertions contained within DPS-025 in relation to housing provision at West Lisburn/Blaris (see SMU01).</p>
CR-030 – Clyde Shanks Ltd	DPS-109	<p>This counter representation states that DPS-109 suggests Blaris’s identification for strategic growth including delivery of new homes is contrary to the RDS 2035 and suggests the need to protect the site as a key location for economic growth.</p> <p>CR-030 contends: Unequivocally, the expansion of lands at Blaris in realising the co-location of strategic employment and housing lands and delivering vital new infrastructure to enhance public transport connectivity, easing movement of freight link the north and north west of the city</p>	<p>This is considered to be a counter representation as it relates to the identified strategic site (SMU01) in the draft Plan Strategy. The counter representation does not refer to a soundness test but includes supporting</p>

		<p>to the A1/M1 key transport routes, reducing congestion in and around the city and offering the opportunity to live and work in a quality environment is sound.</p> <p>The employment zoning at Blaris has not 'underachieved' since first identified in draft BMAP in 2004. It has not delivered at all.</p> <p>Key to delivery of this major urban expansion, as has been proven in successful examples of this scale of strategic growth elsewhere in these islands, is a sustainable mix of uses that can generate value in the lands to fund the necessary upfront infrastructure of the M1-Knockmore link road. Policy encourages integration of such major mixed use land use to achieve sustainability. That should occur where there are sustainable transport linkages as is evidently the case at Blaris.</p>	<p>information to rebut DPS-109.</p>
CR-031 – Clyde Shanks Ltd	DPS-122	<p>This counter representation states that DPS-122 suggests housing delivery at Blaris is a long term option.</p> <p>CR-031 contends: The Plan Strategy should be flexible both in terms of its Plan period and also in assessing realistic levels of housing contribution that lands at Blaris may make during that plan period. Unequivocally, the expansion of lands at Blaris in realising the co-location of strategic employment and housing lands, delivering vital new infrastructure to enhance public transport connectivity, easing movement of freight, offering connection to a future link to the MLK lands and the opportunity to live and work in a quality and highly sustainable environment is sound.</p>	<p>This is not considered to be a counter representation as it does not object to the lands identified in the site specific representation; rather it objects to assertions contained within DPS-122 in relation to housing provision at West Lisburn/Blaris (see SMU01).</p>
CR-032 – Voluntary community Group	DPS-035	<p>This counter representation raises issues with DPS-035 and accompanying site location plan MPS-035C (Ballyskeagh) stating impact on the following:</p> <ul style="list-style-type: none"> • Infrastructure, roads, flooding and sewage capacity; • Scale of proposed site is incompatible with the existing settlement; and • Proposed area is a Local Landscape Policy Area and an Area of Outstanding Natural Beauty. The quality, character and heritage value of the landscape of an AONB lies in their tranquillity. <p>The Local distinctiveness, conservation interest, visual appeal and amenity value will be lost.</p>	<p>This is considered to be a counter representation as it relates to a site specific representation. The counter representation does not refer to a soundness test but includes supporting information to rebut DPS-035 (MPS-035C).</p>

CR-033 – One2One Planning	DPS-036	<p>This counter representation initially highlights areas of mutual agreement however it subsequently highlights areas of difference and provides rebuttal evidence to DPS-036 which raise issues which are considered site specific. It is not agreed that the inclusion of Drumkeen Retail Park assists in the consolidation of the Centre and a number of matters raised to add to the consideration of the boundary (when the extent of designation is considered under the local policies plan).</p> <p>It provides detailed rebuttal evidence as follows:</p> <ul style="list-style-type: none"> • The expansion of the Centre to include Drumkeen Retail Park is not supported in evidence within the Arup report (TS6) given it does not show significant capacity and there is no benefit to bulky retailing being located within a district centre. • The inclusion of Drumkeen Retail Park would further dilute the convenience role of the Centre, necessitating a change to the DPS Policy T4. • If Drumkeen Retail Park is included the resulting rebalance in its role towards comparison retailing would necessitate a consideration of its status beyond that of a traditional district centre. • The Council have pushed back the consideration of the boundary to a different stage of the plan process to its corresponding policy and accordingly at this time the boundary must reflect the role of the district centre envisaged in policy. 	<p>This is considered to be a counter representation as it relates to a site-specific representation. Although DPS-036 does not include a map DPS-036 does make reference to a site specific area. The counter representation challenges the representation on the grounds of soundness (C1, C3 and CE1) and includes supporting information.</p>
CR-034 - Retail NI	DPS- 094	<p>This counter representation indicates the following site specific issues in relation to DPS-094:</p> <ul style="list-style-type: none"> • Retail NI disagrees that it is the responsibility of the Plan to define Sprucefield’s future role under SMU03, as it is accepted by all parties to be a Regional out-of-town shopping centre. Logically it must fall to the Department to draft policy and Key Site Requirements (KSRs) given its regionally significant role, sphere of influence outside LCCC and silence in the SPPS relating to Sprucefield. • The quantum of floor space should not be prescribed, as it undermines and predetermines any future needs assessment 	<p>This is considered to be a counter representation as it relates to a site specific representation. It The counter representation challenges the representation on the grounds of soundness (Consistency, Coherence and Effectiveness).</p>

		<p>or updated retail capacity study, which would accompany future retail or leisure applications.</p> <ul style="list-style-type: none"> • Taking account of points made in the representation and paying regards to the Regional retail and leisure environment it would be completely unsound to seek an additional 50,000sqm (538,195sqft) expansion to Sprucefield as advocated in SMU03. To attempt to claim this would be complementary to Lisburn City Centre or needed is fanciful. • The complementary role to Lisburn City Centre is not demonstrated by any evidence of linked trips between the two sites or in the Council's Retail Capacity Study. • Need is not well defined in the SPPS and would have benefitted from better drafting. Although it is capable of objective interpretation it is a "low" bar policy test. • The greatest concern is the contradictory conclusion which states that "the emerging Planning Policy for the City Council Area is not over prescriptive when it comes to administrating top down national policies which seek to protect town centres by presuming against development of changes at out of town centres" The counter representation suggests the representation is unsound and contradictory in relation to Sprucefield and the tests of Consistency, Coherence and Effectiveness. 	
CR-035 Retail NI	DPS-037	<p>This counter representation indicates the following site specific issues in relation to DPS-037:</p> <ul style="list-style-type: none"> • It is noted that Sprucefield Regional Centre is 65,000 sqm of existing gross external floorspace. The size of UK Shopping Centres is irrelevant and only undermines the approach as being unsound, as they are not comparable to Northern Ireland and do not exhibit the same population density or catchments. • Disagrees that it is the responsibility of the Plan to define Sprucefield's future role under SMU03, as it is accepted by all parties to be a Regional out-of-town shopping centre. Logically it must fall to the Department to draft policy and Key Site Requirements (KSRs) given its 	<p>This is considered to be a counter representation as it relates to a site-specific representation. The counter representation challenges the representation on the grounds of soundness (Consistency, Coherence and Effectiveness).</p>

		<p>regionally significant role, sphere of influence outside LCCC and silence in the SPPS relating to Sprucefield.</p> <ul style="list-style-type: none"> • Agree that the quantum of floorspace should not be prescribed. In our opinion it undermines and predetermines any future needs assessment or retail capacity study, which would accompany future retail or leisure applications. • The representation by LCC Group that the floorspace should exceed 50,000sqft is unsound nor has it been fully justified. • The representation is nothing short of an unjustified land grab to have their land included within the boundary of Sprucefield Regional Shopping Centre. • Paying regard to the Regional retail and leisure environment it would be completely unsound to seek upwards of 50,000sqm (538,195sqft) expansion to Sprucefield, as advocated. • Need is not well defined in the SPPS and would have benefitted from better drafting. <p>The counter representation suggests the representation is unsound and contradictory in relation to Sprucefield and the tests of Consistency, Coherence and Effectiveness.</p>	
CR-036- Retail NI	DPS-038	<p>This counter representation indicates the following site specific issues in relation to DPS-038:</p> <ul style="list-style-type: none"> • It is noted that Sprucefield Regional Centre is 65,000 sqm of existing gross external floorspace. The size of UK Shopping Centres is irrelevant and only undermines the approach being unsound, as they are not comparable to Northern Ireland and do not exhibit the same population density or catchments. • Disagrees that it is the responsibility of the Plan to define Sprucefield’s future role under SMU03, as it is accepted by all parties to be a Regional out-of-town shopping centre. Logically it must fall to the Department to draft policy and Key Site Requirements (KSRs) given its regionally significant role, sphere of influence outside LCCC and silence in the SPPS relating to Sprucefield. • Agree that the quantum of floorspace should not be prescribed. In our opinion it 	<p>This is considered to be a counter representation as it relates to a site specific representation. The counter representation challenges the representation on the grounds of soundness (Consistency, Coherence and Effectiveness).</p>

		<p>undermines and predetermines any future needs assessment or retail capacity study, which would accompany future retail or leisure applications.</p> <ul style="list-style-type: none"> • The proposed scale (50,000sqm) does not take account of the local population density, lack of critical mass or need given the existing vacant units. • The assertion that the floorspace should exceed 50,000sqft is unsound nor has it been fully justified. • The representation is nothing short of an unjustified land grab to have land included within the boundary of Sprucefield Regional Shopping Centre, so that it enhances the land value given the proposed route of the new M1-A1 link road. • Paying regard to the Regional retail and leisure environment it would be completely unsound to seek upwards of 50,000sqm (538,195sqft) expansion to Sprucefield, as advocated. • Need is not well defined in the SPPS and would have benefitted from better drafting. Although it is capable of objective interpretation it is a “low” bar policy test. 	
CR-037- Lisburn Buildings Preservation Trust	DPS-078	<p>This counter representation regarding DPS-078 expresses concern in respect of the proposed ‘Opportunity site’ in the southern portion of the ‘Monument Field’ as indicated in the associated map MPS 078.</p> <p>It is the view of the Trust that this would be an inappropriate development site which would have a detrimental effect on the setting and perspective of the Grade A listed Downshire Monument.</p>	<p>This is considered to be a counter representation as it relates to a site specific representation. The counter representation does not refer to a soundness test but includes supporting information to rebut DPS-078.</p>
CR-038 - Individual	DPS-014 & 015	<p>This counter representation supports the retention of residential zoning MA04/10 in draft BMAP and its benefit to support chapters 4A and 4C of the draft Plan Strategy.</p> <p>There is disagreement with the detail of the representations made in DPS14 and DPS15 that claim Moira is not capable of sustaining further development.</p>	<p>This is not considered to be a counter representation as it does not relate to site specific representations; rather it objects to a statement contained within representations</p>

			DPS-014 and DPS-015 in relation to the ability of Moira to sustain further development.
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Appendix A: List of Counter Representations Submitted

Counter Representation Number	Name	Counter Representation relates to the following Representation(s) in the draft Plan Strategy.
CR-001	Department of Agricultural Environment and Rural Affairs (DAERA)	DPS - 001
CR-002	Individual	DPS - 035
CR-003	Individual	DPS - 023
CR-004	Historic Environment Division (HED) Department for Communities	DPS - 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.
CR-005	Clyde Shanks Ltd	DPS - 017
CR-006	Gravis Planning	DPS-12; DPS-90; DPS-93
CR-007	Gravis Planning	DPS-12; DPS-090; DPS-093
CR-008	Gravis Planning	DPS-12; DPS-090; DPS-093
CR-009	Individual	DPS-089
CR-010	One2One Planning	DPS-063
CR-011	Individual	DPS-089
CR-012	Individual	DPS-035
CR-013	Individual	DPS-035
CR-014	Individual	DPS-035
CR-015	Jonathan Bradshaw	DPS-090
CR-016	One2One Planning	DPS-035
CR-017	One2One Planning	DPS-034
CR-018	One2One Planning	DPS-054
CR-019	One2One Planning	DPS-118
CR-020	Department of Agricultural Environment and Rural Affairs, Natural Environment Division DAERA	DPS-035
CR-021	Department of Agricultural Environment and Rural Affairs Natural Environment Division DAERA	DPS-085
CR-022	Department of Agricultural	DPS-118

	Environment and Rural Affairs Natural Environment Division DAERA	
CR-023	Department of Agricultural Environment and Rural Affairs Natural Environment Division DAERA	DPS-128
CR-024	Clyde Shanks Ltd	DPS-025
CR-025	Clyde Shanks Ltd	DPS-034
CR-026	Clyde Shanks Ltd	DPS-039
CR-027	Clyde Shanks Ltd	DPS-041
CR-028	Clyde Shanks Ltd	DPS-084
CR-029	Clyde Shanks Ltd	DPS-095
CR-030	Clyde Shanks Ltd	DPS-109
CR-031	Clyde Shanks Ltd	DPS-122
CR -032	Other	DPS-035
CR-033	One2One Planning	DPS-036
CR-034	Retail NI	DRS-094
CR-035	Retail NI	DPS-037
CR-036	Retail NI	DPS-038
CR-037	Lisburn Building Preservation Trust	DPS-078
CR-038	Individual	DPS-014,015