



09.01.2020

BY EMAIL LDP@lisburncastlereagh.gov.uk

Development Plan Team
Civic Headquarters
Lagan Valley Island
Lisburn
County Antrim
BT27 4RL

Dear Sir/Madam

Please find attached;

1. Local Development Plan 2032 (LDP) Draft Plan Strategy Representation Form
2. Map showing that the portion of the settlement situated to the rear of 14 and 14E Feumore Road (shown coloured red on the attached map) referred to within the Representation form and below.

We also refer to our submission regarding the **Local Development Plan Preferred Options Paper** and the **Sustainability Appraisal Interim Report** which is focused on the Feumore Settlement (Feumore Road Ballinderry Lisburn).

In regard to the LDP we make the following submissions

(A) The Local Character of Feumore

Feumore is a rural and quiet settlement within an area of scientific interest, high scenic value, and is also within the Lough Neagh and Lough Beg Special Protection Area. In addition Feumore is within an internationally designated Ramsar site.

In our view a tailored sustainability appraisal and a Habitats Regulation Assessment is essential within the context of the Feumore settlement due to its environmentally sensitive character.

There would appear from the LDP to be a clear commitment to protecting and promoting the natural environment, recognising the importance of the open countryside and the designation of areas of high scenic value and the protection of key environmental assets. The Feumore area is characterised by these key environmental attributes and should be protected.

2. The Local Character of the Feumore settlement is under serious threat.

While the existing development plan provides for a housing strategy aiming to protect rural areas from development pressure the existing identity of the Feumore settlement through existing and proposed developments (see recent planning applications and permissions 2019, 2017 and 2008) will in our view lead to excessive and inappropriate over development with little appreciation for the local rural character. It is clear that the local rural character of Feumore is clearly under significant pressure and threat of significant adverse change and therefore necessitates a countryside type assessment.

Small settlements such as Feumore need to have their identity protected from excessive development.

We strongly feel that the shorelines of Lough Neagh particularly in the Feumore area need to be conserved. We would therefore recommend that a portion of the existing settlement development limit settlement limit is reduced to remove the area shaded red on the attached map (see point 3 below) and indeed no further expansion of this settlement development limit is permitted in order to protect the Ramsar, SSI and areas of high scenic value and to secure through appropriate designations that they remain unspoilt for future generations.

3. If any further lands are included within the settlement this will have serious and irreversible consequences to a settlement already under significant threat.

The local infrastructure cannot sustain or service same.

In the last short period permission has been granted for in total 10 large two storey houses with application being considered for further substantial housing with paired access, set in small plots and in very close proximity to each other which in our view is more akin to a suburban environment. Within the spatial context of the Feumore Settlement such development represents uncharacteristic and over development. Any plan to further extend the settlement may have catastrophic implications and will destroy the rural character and identity for future generations.

In line with the regional development strategy 2035, we are pleased to see that the LDP is committed to the conservation, protection and enhancement of the natural environment. With regard to the Lough Neagh and the Feumore settlement area we

completely agree that the following considerations from the RG11 (RDS) are highly relevant in relation to the settlement limits of the Feumore area; namely;

- Recognise and promote the conservation of local identity and distinctive landscape character.
- Conserve, protect and where possible enhance areas recognised for their landscape quality
- Protect designated areas of the countryside from inappropriate development and continue to assess areas for designation"

Consequently, in accordance with the SPPS, we trust the Council will take "full account of the implications of proposed land zonings, locations for development and settlement limits on built and heritage features and landscape character"

Furthermore, we make a submission that the portion of the settlement situated to the rear of 14 and 14 E Feumore Road (shown coloured red on the attached map) should be de-zoned and removed from the settlement development limit for the following reasons:

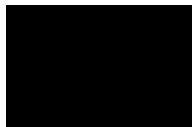
- (a) The lands in question are land locked and cannot be accessed independently.
- (b) We refer to LPD (Draft plan Strategy) pp. 36 COU8 – whereupon planning permission will be refused for a building which extends or adds to ribbon development. Indeed, it states that "The proposed dwellings must respect the existing pattern and be appropriate ...". The property at 14 E Feumore Road (located on the road side of the settlement) has now been constructed for occupation by a disabled person and is situated directly in front of the lands in question. Any such application for a dwelling on the lands in question (while there would be many clear planning objections to such) would significantly represent tandem development/ribboning which must be resisted as entirely contradictory to the rural character of the Feumore settlement and indeed well beyond in the rural council area. Such de-zoning/removal from the settlement development limit would eliminate such risk in the future and go some way to maintain the identity and character of Feumore.
- (c) We understand these lands were included in the last settlement change however the reasoning for same is both unclear and questionable particularly given its shape, location and lack of access. It is unclear as to whether the lands in question have actually been walked/ examined when the decision was taken to incorporate it within the Settlement.
- (d) The lands are on the lough shore side of the Feumore Road and as outlined above are in an environmentally sensitive area. To remove this portion of land out of the settlement development limit would meet the strategic objectives of PPS2 and the regional 2035 policy RG11 i.e. "that society shall conserve, protect and where possible enhance our natural environment by protecting designated areas of this countryside from inappropriate development"

Recent and more significantly proposed planning applications in the Feumore settlement is placing significant pressure on the local landscape area which shall have irreversible and detrimental consequences. For this reason, the sustainability appraisal should pay particular attention to the Feumore settlement. In full agreement with the Sustainability Appraisal Interim report, we submit that there is the on-going risk of over development within the Feumore settlement and any further expansion of the settlement development limit should be strongly rejected so as to "halt the loss and fragmentation to this tranquil area". The local distinctiveness of Feumore cannot be overstated.

We very much appreciate your kind attention to the matter and look forward to receiving your response in due course.

With our kindest regards

Yours faithfully





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 than 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:-

We refer to our submissions to the Preferred Options Paper and to the specific comments regarding Feumore in the Local Development Plan Preferred Options Public Consultation Report.

With reference to the Local Development Plan 2032 (LDP);

LDP Chapter 1- introduction. We are particularly pleased to see that the LDP will be created alongside a sustainability appraisal and the habitats regulation assessment as the Feumore Settlement Area is a designated Ramsar site, an area of special scientific interest and an area of high scenic value, a sustainability appraisal is highly relevant. – note page 29 of the LDP plan/ Draft Plan Strategy – the recognition of a range of environmental designations including Ramsar site located at Lough Neagh and Lough Beg, areas of high scenic value and areas of special scientific interest. All of which are applicable to the Feumore settlement.

LDP Chapter 2 - policy and spatial context - The strategic planning policy statement for Northern Ireland and one of its five principles “preserving and improving the built and natural environment” is particularly relevant to the Feumore area. Re spatial context there is a significant environmental designation for Feumore including the Ramsar site at Lough Neagh and an area of high scenic value and special scientific interest. In our view, the character of the Feumore settlement is under serious threat – while the existing development plan provides for a housing strategy aiming to protect rural areas from development pressure the existing identity of the Feumore settlement through existing and proposed developments (see recent planning applications 2008,2017 and 2019) will lead to excessive and inappropriate over-development with little appreciation for the rural character. In our view it is clear that the local rural character of Feumore is under significant pressure and threat of significant adverse change and therefore necessitates a countryside type assessment.

See continuation Sheet (1)

Continued (1)

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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:-

LDP Chapter 3 – A green Plan

There would appear to be a clear commitment to protecting and promoting the natural environment, from recognising the importance of open countryside and the designation of areas of high scenic value and the protection of key environmental assets. Feumore area is characterised by these key environmental attributes and should be protected.

LDP Chapter 4- Strategic policies and spatial strategy

We are pleased that the strategic policy 01 – sustainable development recognises the importance of protecting and enhancing the historic and natural environment – (this is particularly relevant to the Feumore settlement) and protects its identity from excessive over-development. Strategic policy 06 – protecting and enhancing the environment – we strongly feel that the shore lines of Lough Neagh, particularly in the Feumore Area need to be conserved and enhanced. We would therefore recommend that settlement limits are **NOT** extended in Feumore and in particular the area shaded red on the map attached situated to the rear of 14 and 14E Feumore Road should be removed in order to protect the Ramsar, ASSI and areas of high scenic value and to secure through appropriate designations that they remain unspoilt for future generations. If any further lands are included within this settlement in our view this will have a serious and irreversible consequence to the settlement which is already under significant pressure. In our view the local infrastructure cannot sustain or service same. The existing settlement is typified by linear pattern, modest size (mostly cottage/bungalow style dwellings set in generous sized plots with individual accesses). Applications now passed in 2017/2019 were planning for eight (8) large two-storey dwellings with paired access and set on small plots (as well as further application for further large dwellings), in very close proximity to each other which is in our view more akin to a suburban environment. In our view any plan to further extend the settlement will have a catastrophic implication and will destroy the rural character and identity for future generations.

Continued (2)

Consent to Publish Response

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SECTION B: YOUR REPRESENTATION

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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:-

Furthermore, we make a submission that a portion of the settlements situated to the rear of 14 and 14E Feumore Road should be removed from the settlement limit for the following reasons;

- A. The lands in question are landlocked and cannot be accessed independently;
- B. Property at 14E (located on the roadside of the settlement) has now been constructed for occupation [REDACTED] and is situated directly in front of the lands in question. Any such application for a dwelling on the lands in question (while there would be clear planning grounds of objections to such) would in our view significantly represent tandem development which must be resisted and is entirely contradictory to the rural character of the Feumore Settlement and indeed well beyond the rural council area. Such rezoning would eliminate such risk in the future and go some way to maintain the identity and character of Feumore. We are pleased that this falls in line with COU8 infill/Ribbon development whereby planning permission will be refused for building which extends or adds to a ribbon development and that "the proposed dwellings must respect the existing pattern of development in terms of siting and design....." given the linear pattern of Feumore the lands in question should be rezoned so as to prevent ribboning and tandem development.
- C. We understand these lands are included in the last settlement change however, the reasoning for same is both unclear and questionable given its shape, location and lack of access. It is unclear whether the lands in question had actually been walked/physically examined when the decision was made to include this small triangular portion of land in the settlement limit.

Continued (3)

Consent to Publish Response

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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.

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SECTION B: YOUR REPRESENTATION

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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:-

- D. The lands on the Lough shore side of Feumore Road and as outlined above are located in an environmentally sensitive area to pull back from the same would in our view meet the strategic objectives of PPS2 and the regional 2035 policy RG11 (as well as strategic policy 6 of LDP 2032) i.e. ("that society shall conserve, protect and where possible enhance our natural environment by protecting designated areas of this countryside from inappropriate development".)

Chapter 4 – Strategic policy and spatial strategy settlement hierarchy

The Feumore settlement has no facilities and therefore there must be a restriction on inappropriate expansion into the surrounding countryside. If any further lands are included within the settlement limit then in our view this will have a serious and irreversible consequence to the settlement already under significant threat. The local infrastructure cannot sustain or service same. The existing settlement is typified by linear pattern of modest dwellings and we would therefore request that the settlement limit is re-examined, not extended and in fact and reduced to remove the land in question as identified on the attached map. We are pleased by the regional guidance (RG8) which seeks to manage housing growth and indeed promote more sustainable housing development within existing urban area. Note however, it is our understanding that it is the position of the council that the settlement limits should not be extended however, we do not see any specific reference to this in the Local Development plan/ Regional Development Strategy (R2035 RDS) which seeks to protect the environment from inappropriate development.

Continued (4)

Consent to Publish Response

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SECTION B: YOUR REPRESENTATION

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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:-

We also welcome strategy policy 01- Housing in the Countryside to resist Urban Sprawl in the open countryside which mars the distinction between rural area and suburban settlements and this gives further credence to our submission as shown on the map attached should be removed from the settlement to prevent such "Urban Sprawl" and development not consistent with the linear build pattern of the Feumore Settlement.

With reference to the local development plan – preferred option paper public consultation report (September 2017). We welcome inclusion of our submission and indeed further submissions regarding strategic objective A "there was several requests to preserve the existing settlements where there was development pressure (including Moira, Drumbeg and Feumore).

We acknowledge reference was made in the consultation response "a respondent welcomed the role of the LDP in identifying the main built and archaeological heritage features and requested the character are of Feumore was identified and protected".

Continued (5)

Consent to Publish Response

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SECTION B: YOUR REPRESENTATION

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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:-

We acknowledge recognition again in the consultation response, "Again the respondent welcomed the POP's commitment to the conservation, protection and enhancement of the natural environment and suggested that Feumore should be considered for protection". We acknowledge recognition of our comment "...the Feumore settlement, which hosts a number of designations including an internationally designated Ramsar site" and "particular interest has been raised in relation to the designation of special countryside areas which aim to conserve the landscape at a local level and the importance of protecting settlements like that of Feumore with designations such as SCA's". We also welcome the noting of our submission Sustainability Impact assessments "... in light of this it was requested that no further settlement, development limit, extensions are made in Feumore in order to meet the sustainability framework objectives" however, we feel that it should go further in stating that the settlement limit should be reduced to exclude the lands shown on the attached map.

We also recognise and appreciate the noting of our comments "request were made to consider the impact that future development will have on the settlement of Feumore and the surrounding area in light of the sustainability objectives identified in the SAI interim report and in particular relevance to the issue of over-development and potential impact on designated sites of conservation of the natural environment".

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

Part 2 –Operational Policies

- Operational Policy (Please State Individual Policy using Policy Reference e.g. HOU 1)

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.

Please note to our submissions in Section B

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

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 note our submissions in Section B

(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

[Signature box]

Date

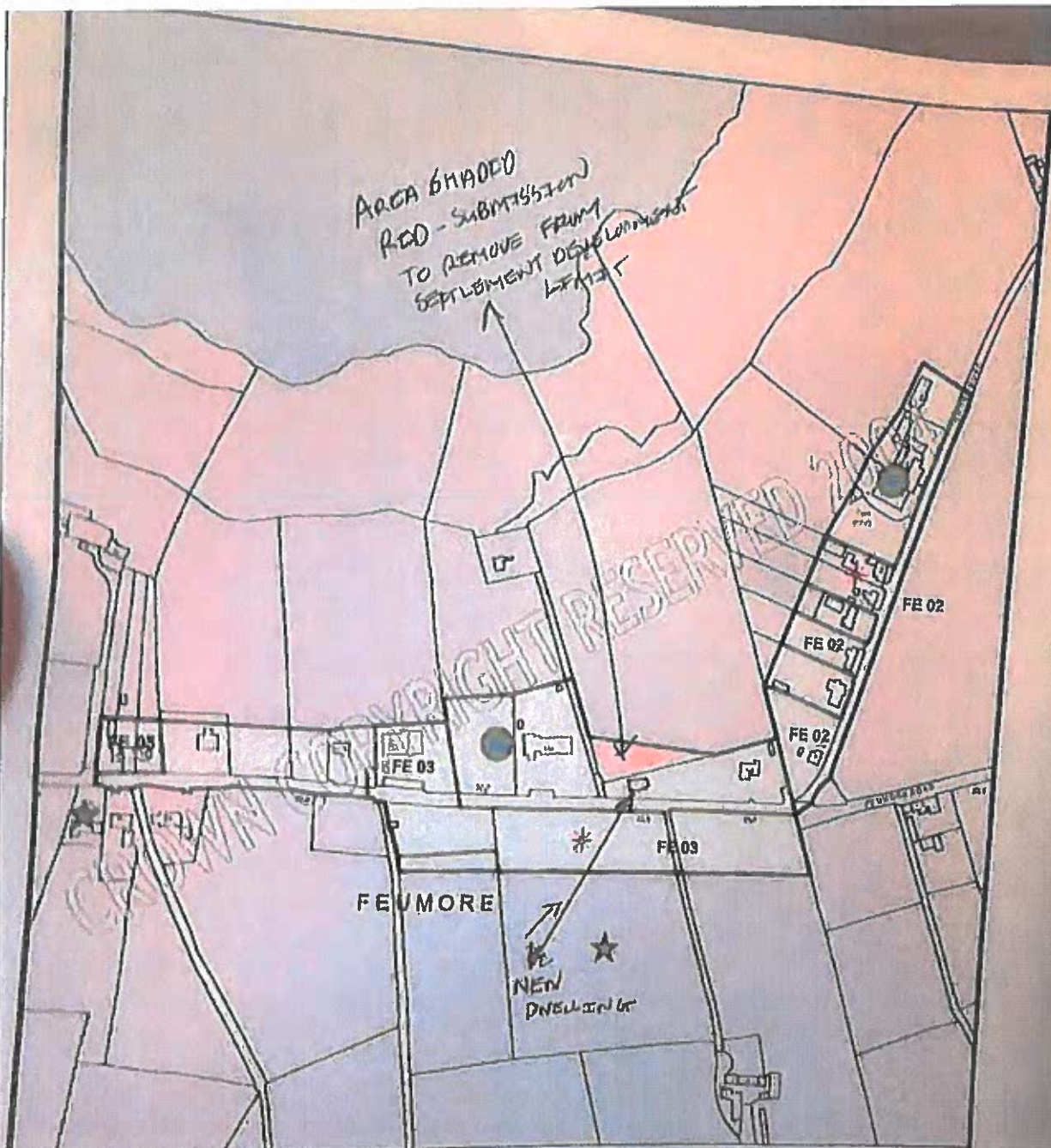
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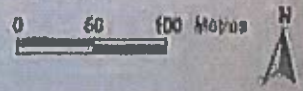
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9/1/2020



AREA SHADDED
RED - SUBMISSION
TO REMOVE FROM
SETTLEMENT DEVELOPMENT
LIMIT



Belfast Metropolitan Area Plan 2016 - Draft Plan
Map No. 28/001 - Fomore*



-  Settlement Development Limit
-  Local Landscape Policy Area (see Classification Map No. 28/002)
-  Local Landscape Policy Area (see Classification Map No. 28/002)

- For Information Only:
-  Ramsar Site (see Appendix Map No. 46/068)
 -  Area of Scientific Interest (see Appendix Map No. 48/076)

*Areas of High Scientific Value and Areas of Constraint on Material Developments Policies apply to the full extent of this map, including inside the Settlement Development Limit. Refer to Map No. 18/001 - Dalmay Countrywide.

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