



Local Development Plan 2032

Draft Plan Strategy

Representation Form

Please complete this representation form online and email to LDP@lisburncastlereagh.gov.uk or alternatively print and post a hardcopy to:-

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

All representations must be received no later that 5pm on the 10th January 2020

SECTION A: YOUR DETAILS

Please tick one of the following:-

- Individual
 Planning Consultant / Agent
 Public Sector / Body
 Voluntary / Community Group
 Other

First Name

Last Name

Details of Organisation / Body

Address

Postcode

Email Address

Phone Number

Consent to Publish Response

Under planning legislation we are required to publish responses received in response to the Plan Strategy, however you may opt to have your response published anonymously should you wish.

Even if you opt for your representation to be published anonymously, we still have a legal duty to share your contact details with the Department for Infrastructure and the Independent Examiner appointed to oversee the examination in public into the soundness of the Plan Strategy. This will be done in accordance with the privacy statement detailed in Section C.

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

SECTION B: YOUR REPRESENTATION

Please set out your comments in full. This will help the independent examiner understand the issues you raise. *You will only be permitted to submit further additional information to the Independent Examiner if the Independent Examiner invites you to do so.*

What is your view on the Plan Strategy?

I believe it to be **SOUND**

OR

We 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.

Summary:

The Draft Plan Strategy is unsound.

This is based on the soundness test CE2 'Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?'

The allocations for employment land is not realistic or appropriate. There is a lack of consideration of the evidence base the councils own review in the allocation of employment land.

This specifically relates to the zoning of the greenfield area of MCH06 at the Upper Newtownards Road as solely industrial land rather than mixed use. We set out our reasons for this over the following 3 points in addition to our submission to the POP.

1. The topography of this section of land is not appropriate for solely industrial use

This zoning is contrary to the Regional Development Strategy's definition of Sustainable Development. Zoning this land solely for industry will likely prevent it's use due to the fact that the demand for heavily sloping industrial land in this area of the council. The Employment Land Review highlights that on this section of the site:





'Contours indicate that the site slopes uphill to the north east, with 30m elevation gain over 300m distance.' (Pg. 80, Development Plan Technical Supplement 3: Employment Land Review October 2019)


The site at the north side of MCH 06 would be much more sustainable if it were a mixed-use site. Generally, we think MCH06 could be split from the southern brownfield flat land and the northern section, currently greenfield and c.15ha in size allocated as a mixed-use site. This could improve the marketability of both of these sites – which is necessary as the Employment Land Review scored the site 'Poor' for marketability.

This plan was put forward and could make a range of benefits for the surrounding area and is summarised on the following page.

Option 5B - Greater benefits through mixed use approach to land at Carrowreagh, part of MCH06

CONCEPTUAL SITE LAYOUT

-  CYCLE WAY
-  WALK WAY
-  RESIDENTIAL
-  COMMERCIAL



Limits amount of industrial traffic for residents of Millreagh and Dunsady rd and the local school.



Community Greenways could provide opportunities for both recreation and exercise through pedestrian and cycle routes.



Better integration of the Urban Fabric of Dundonald and provision of clear and attractive townscape



More sympathetic development for the Craiganlet slopes which are an Area of High Scenic Value.



UNEMPLOYED
Supports LCCC economic development through additional employment opportunities suitable for the area.



Permeability for local residents.




Retain a sense of place for local residents when they experience Dundonald



Joins up Millreagh and Dunsady Rd housing which strengthens community cohesion and fosters a stronger community spirit.

2. The amount of industrial land allocated in the council is unsound and no demand for industrial land is likely to emerge given the likely economic trends

We are concerned that the allocation of land to solely industrial land at MCH06 has not taken into account the evidence provided in LCCC's own Position Paper on Employment and Economic Development. That paper provides the following statements about the future of economic trends in the council area:

'It is anticipated that future economic growth will transition towards high value-added exportable activities and if Lisburn & Castlereagh City Council area is to participate in this direction it will have to supply a suitable skilled and qualified workforce.'

'Opportunities are in private services and the office sector. Retailing could also be supported. Diversifying the economy and increasing opportunities to cluster and evolve could grow individual sectors. The main sectors for growth include information and communication, professional services as well as administrative and support services'

(pg. 28)

The use class allocated to this land does not react to the economic development trends the council sets out in its evidence and hence this site should be reclassified as mixed use. The reclassification of the site as mixed use would be of great benefit to the local area and would:

- Support LCCC economic development through suitable places to live and work for the surrounding area
- Limit the amount of industrial traffic through Dundonald as people would be able to live and work close by to each other.

These are both economic benefits of mixed use, but in addition there are health benefits and benefits in retaining a sense of place for the surrounding residents.

In addition to the evidence presented above, the Employment Land Review highlights some other factors that we believe have not been given adequate consideration and therein the strategy is unsound:

2. There are no particular concerns with the existing quantity of employment land but there may be a need to re-focus the supply on locations with good road connectivity – with particular emphasis on the importance of the Belfast to Dublin corridor. Traffic problems and links are key issues that should be taken into account in the zoning of employment land.

3. The distribution, manufacturing, transportation and food sectors are doing well in Lisburn & Castlereagh and should be supported through the provision of appropriate sites; however, it is noted that there has not been much demand for industrial premises.

4. There is market preference for existing properties that are cheaper to refurbish than new builds on undeveloped sites.

5. There is a need to support growth in the service sectors, which can be partly through mixed use developments

(Market Feedback (4.7) Employment Land Review – Technical Supplement 3)

and

A total of 10 of the 20 assessed sites scored poorly in terms of market demand, indicating that this is a concern generally. These sites are distributed across Lisburn & Castlereagh, with 4 in the Lisburn area (LC10, ML05, LC07 and LC08), 2 in Carryduff (CF09 and CF06), 2 in Dundonald (MCH12 and MCH13), 1 in Newtownbreda (MCH06) and 1 in Glenavy (GY05).

Assessment of Employment Sites: Employment Land Review – Technical Supplement 3

3. Even if the economic trends are not correct and manufacturing and industry increases in the next years the amount of industrial land allocated is too high

The demand for 'pure' industrial land is far beneath the amount of industrial land allocated. If the current rate of industrial land take up was achieved it would take almost 100 years for the council to run out of the industrial land currently allocated. The evidence for this is in the Employment Land Review:

Between 2015 and 2019, a total of 11.97ha of B class employment land was developed, equivalent to an average of 2.99ha per annum. The area of land remaining to be developed is 275.4ha, the vast majority (91.6%) of which is greenfield.

Pg. 36

These scenarios give rise to a wide range of employment land requirements, ranging from +12.64ha to +44.85ha, equivalent to a range of +0.84ha to +2.99ha per annum.

Pg 47.

A mixed use allocation for the industrial land at the northern section of MCH06 would improve the marketability and the likelihood of sustainable use for the sites. Kept as industrial land the land is unlikely to be received on the market well, despite our best efforts to have the land brought into use (over the last c. 20 years!)

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.

The site at the north side of MCH 06 would be much more sustainable if it were a mixed-use site. Generally, we think MCH06 could be split from the southern brownfield flat land and the northern section, currently greenfield and c. 15ha in size allocated as a mixed-use site. This could improve the marketability of both of these sites – which is necessary as the Employment Land Review scored the site 'Poor' for marketability.


This plan was put forward and could make a range of benefits for the surrounding area and is summarised on the following page.

Option 5B - Greater benefits through mixed use approach to land at Carrowreagh, part of MCH06

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-  RESIDENTIAL
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 Limits amount of industrial traffic for residents of Millreagh and Dunlady rd and the local school.

 Community Greenways could provide opportunities for both recreation and exercise through pedestrian and cycle routes.

 Better integration of the Urban Fabric of Dundonald and provision of clear and attractive townscape

 More sympathetic development for the Craigtanlet slopes which are an Area of High Scenic Value.

 UNEMPLOYED
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In summary,

- A mixed use site of housing and compatible business uses will be a cohesive vision for Dundonald, with a sense of place based on good design and place making as a core directive, and integrating the urban fabric by connecting two major housing areas east and west. Further linkage is by greenways to the Ulster Hospital, the Comber Greenway to Belfast and connecting to Bangor and Downpatrick.
- We have described the benefits of a mixed use development on the subject site which cannot be delivered by economic development. As in existing adjacent housing areas with a similar topography, housing can be developed without the prohibitive land modelling required for economic development. Prominent features of the site will remain as open space to enhance and integrate housing with its surroundings.
- We believe that the volume of available land in LCCC area and the local catchment will enable LCCC to achieve their objectives in the Development Plan Period under Strategic Objective B: Driving Sustainable Economic Growth and the Lisburn and Castlereagh City Council Economic Strategy.
- We believe that the availability of employment land across LCCC area may be understated based on the fact that the amount of available employment land in Dundonald is significantly greater than is highlighted in the Development Plan Position Paper 3: Employment & Economic Development.
- The site is unsuitable to realize the benefits that LCCC aim for in zoning employment land. The land has been zoned for almost 20 years and has not had any enquiries about use.

We also include further details on the reasons for modification of this site:

1. Site Location and Description

- 1.1. The site is located within the settlement of Dundonald approximately 4km to the west of Newtownards. The zoned site has an area of approximately 15.54 hectares which is shown in the map in *Figure 1: Location Map*.



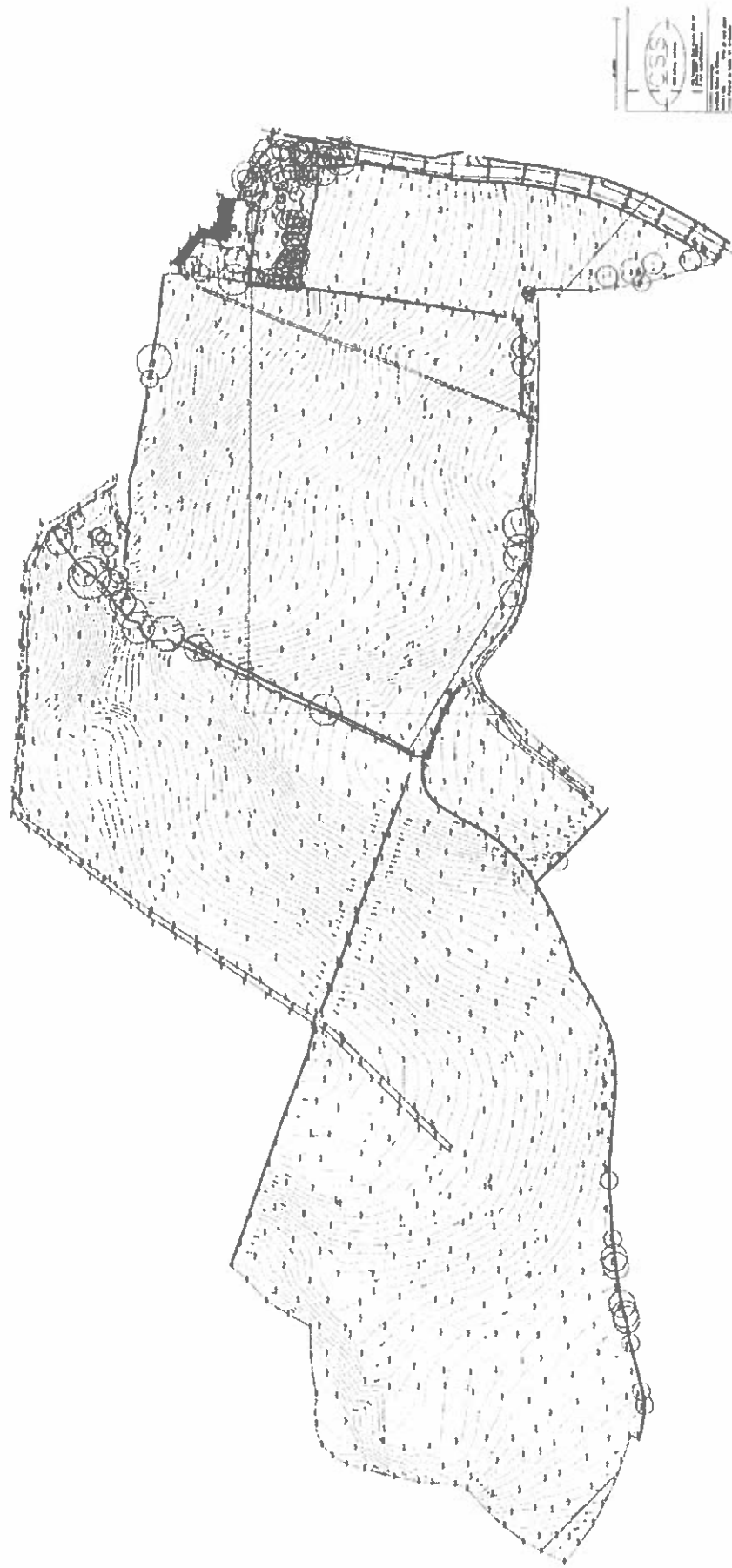
Figure 1: Location Map

Dundonald

- 1.2. Dundonald is a suburban village being part of the Belfast Urban Area and accommodates a range of private sector and social housing, being a very popular suburb.
- 1.3. The settlement has a wide range of land uses including retail facilities largely of a local nature, a number of schools and some employment opportunities. The major employer in the area comprises the Ulster Hospital, which is one of Belfast's premier hospital facilities where services include A & E and Maternity. The hospital is currently in the latter stages of a redevelopment programme where c. £100M is being spent to upgrade and extend facilities. Other employers in close proximity include Stormont Estate the seat of the Northern Ireland Executive.
- 1.4. To the north of the site, the land rises to grassland. The site is on a south facing hillside ranging between 40m AOD and 70m AOD. Two watercourses run down from Carrowreagh hill north of the site; one runs along the western boundary of the site and the housing area at Lambert Avenue, and the other cuts a steep course through the centre of the site. A section of the site has a prominent ridge running in a northeast/southeast direction with the land sloping on either side to the east and west. The lands are steep in nature, having a rising gradient from south to north together with additional undulations and the bisecting glen which again runs from south to north. The lands have the benefit of mature field divisions and boundaries to the north which provide a sustainable and natural boundary onto open countryside. To the west lies a housing development around Lambert Avenue and to the east across Carrowreagh Road is another housing area called Millreagh.

- 1.5. We have included a contour map to demonstrate the topography of the site in *Figure 2: Topography Map*.
- 1.6. The subject lands lie to the north of the settlement, being adjacent to commercial, academic and residential facilities, the main approach to the lands being from Carrowreagh Road, which is just off the main Belfast to Newtownards trunk road.
- 1.7. To the south of the site lie the Dundonald Industrial Estate, the Government Training Centre, Dundonald Enterprise Park and Dundonald High School. In contrast to the level land to the south occupied by the industrial premises and the school, the site rises along the Carrowreagh Road.
- 1.8. The site lies within the Belfast Urban Area and has been zoned for industry and commerce from the Belfast Urban Area Plan 2001 to the present Belfast Metropolitan Area Plan 2015, which operates as the adopted plan for LCCC.
- 1.9. Outline planning permission was granted for industry and commerce in 2010 and renewed in 2016.

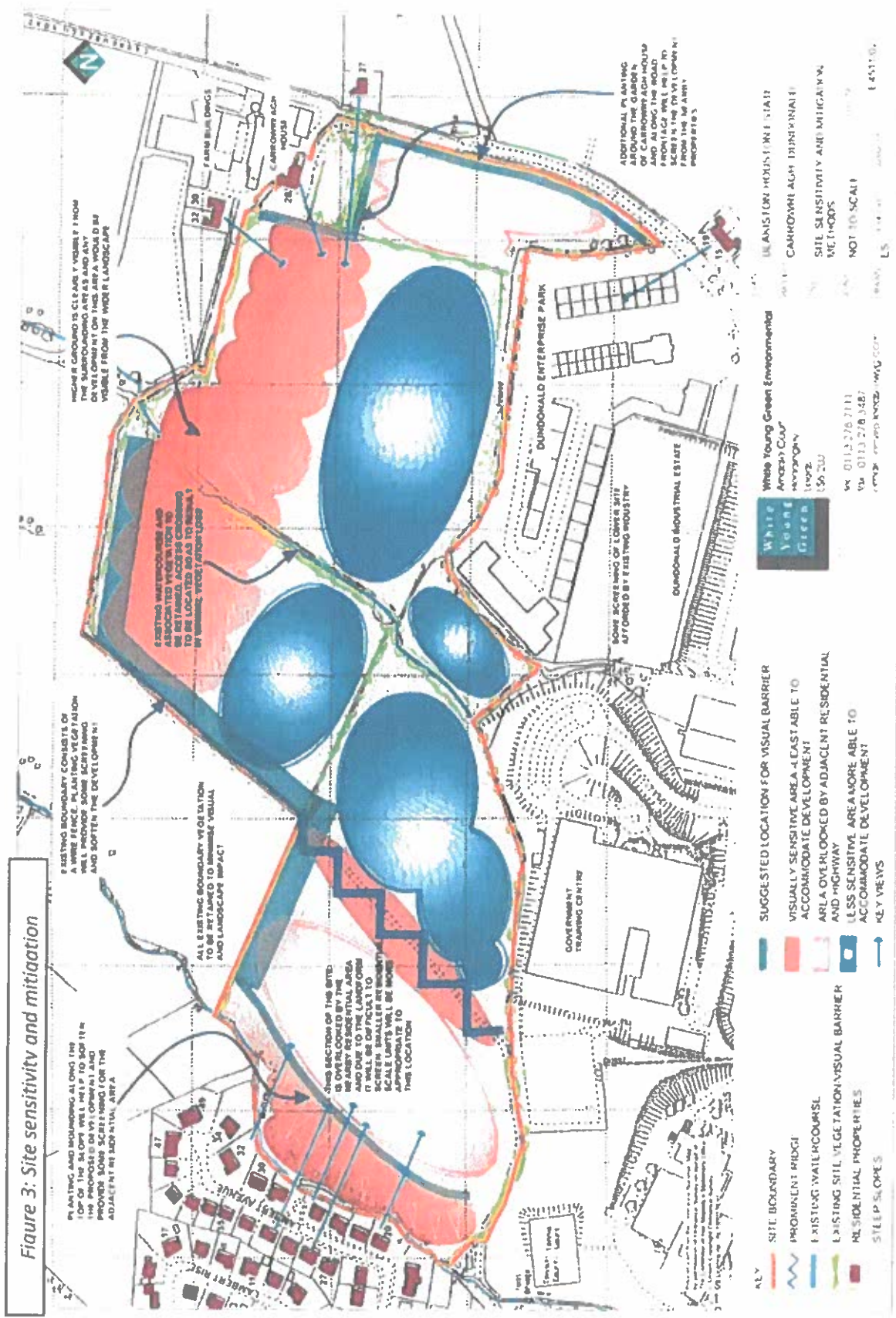
Figure 2: Topography map



2. A Potential Proposal for Development

- 2.1. Whilst the unsuitability of the site for economically viable industrial and commercial buildings has been apparent, the existing residential areas at Lambert Avenue and Millreagh demonstrate the **viability of residential development along with open space** on the existing topography of the site.
- 2.2. We propose a mixed use development for the site that includes residential use along with a business park compatible with residential. These compatible uses i.e. B1(b) call centre, B1(c) research and development or B2 light industry would occupy the lower part of the site adjacent to the existing commercial development in Dundonald Industrial Estate, where contours are easier.
- 2.3. **There are multiple benefits that support achieving LCCC objectives should the development land be a mixed use development.** This includes:
 - Residential development on the site would link the Lambert Avenue area to Millreagh and The Old Mill facing the Belfast Road to Newtownards to **integrate the urban fabric and green space.**
 - **Better integration of the Urban Fabric** of Dundonald and provision of clear and attractive townscape.
 - **Limits amount of traffic** for residents of Millreagh and Duntady Rd.
 - Cycle ways and pedestrian linkage through the proposed housing to the business park and the other existing residential areas and well as connection to Dundonald High School will **provide safe access and better social and employment connections.**
 - Supports economic development, **job creation and increases opportunities for innovation and small scale entrepreneurs.**
 - **Permeability** for local residents with regard to crime prevention-design.
 - 20mph zone within the development designed to be self-enforcing through the use of speed bumps, chicanes, road narrowing, planting etc, to physically and visually reinforce the **shared nature of the roads.**
 - **Retain a sense of place for local residents** when they experience Dundonald
 - **More sympathetic development** close to the Craigtanlet slopes which are an Area of High Scenic Value as is shown in Figure 3 *Site sensitivity and mitigation methods* on the next page.
 - **Supports LCCC economic development** through additional employment opportunities suitable for the area.

Figure 3: Site sensitivity and mitigation



3. Planning Context

Regional Development Strategy 2035

3.1. *Regional Development Strategy 2035* is a material consideration as the spatial and strategic framework for development plans and planning policies in Northern Ireland: There is a requirement that Government Departments “*have regard to the regional development strategy.*”

3.2. This requires that planning policies and guidance are “*in general conformity with RDS.*”

3.3. The site is within the Belfast Metropolitan Urban Area and Regional Guidance on the economy states in the RDS:

“*RG1. Ensure adequate supply of land to facilitate sustainable economic growth.*

- *Protect zoned land. Land zoned for economic use in Development Plans should be protected as it provides a valuable resource for local and external investment, thereby contributing to the Programme for Government (PfG). Protection of such zoning should ensure that a variety of suitable sites exist across Northern Ireland to facilitate economic growth.*” (p.32, RDS)

3.4. The significant terms which determine protection are “*suitable sites*” and “*to facilitate economic growth*”. It is clear that facilitating economic growth on the site has not been successful for the reasons previously stated and therefore it is not a suitable site for local and external investment and contributing to the PfG.

3.5. The Dundonald area must also be considered in terms of suitable alternative sources of employment in the Belfast area and also as part of a cluster. SFG11 in R.D.S promotes development opportunities at hubs and clusters to grow the population. In particular, it identifies the hubs and clusters of hubs that should be considered first in terms of new development. SFG12 is concerned with population growth in larger centres to off-set the disproportionate growth of population in smaller settlements.

“*SFG12. Growing the population in the Hubs and clusters of hubs.*

- *Provide additional housing in the Hubs and cluster of hubs across the Region. Key to population growth and associated regeneration of urban centres is their provision of additional housing. This will require sensitive design, including mixed use schemes and integration with green-space, to ensure that they link into the existing urban fabric. It will also be important to phase and manage urban growth taking account of capacity (including water supply and waste water infrastructure) or if it can be provided ahead of development without environmental harm.*” (p.72, RDS)

3.6. The Regional Development Strategy identifies Newtownards to cluster with the Belfast Metropolitan Urban Area:

“and due to its proximity and accessibility to the city plays a growing role in the functioning of the Belfast Metropolitan Urban Area by attracting commuters, tourists and businesses and as such has the potential to cluster with BMUA.” (p.70, RDS)

and

“While traditional industries have declined dramatically, Ards is establishing a diverse economy, particularly in the added value food and engineering sectors. Newtownards, the Borough’s capital town has a long established reputation as a prime retail destination, with a vibrant mix of high street and independent shops” (p.70, RDS)

Clearly the proximity of Newtownards in particular is of interest in the availability of land for industry and commerce.

- 3.7. The RDS in RG1 ensures an adequate supply of land to facilitate sustainable economic growth. To access the quality and viability of sites zoned for economic development uses in the area plans, advocates the following:

“a system to monitor the take up (and loss) of employment land is required to help inform planning and investment decisions and actions. It is likely that the highest quality and most easily accessible land will be used up first and it is important that decisions are not based purely on the quantum of land available but how well connected it is, for example to public transport. The framework at Table 3.1 Page 32 in the RDS will enable Planning Authorities to identify robust and defensible portfolios of both strategic and locally important employment sites in their development plans. This will safeguard both new and existing employment areas for employment rather than other uses.” (p.31, RDS)

- 3.8. Table 3.1 Employment Land Evaluation Framework is divided into 3 stages:

Table 3.1: The Employment Land Evaluation Framework	
Stage 1 – Taking Stock of the Existing Situation	An initial assessment of the ‘fitness for purpose’ including the environmental implications of the existing employment land portfolio. This is principally in order to identify the ‘best’ employment sites to be retained and protected and identifying sites that should clearly be released for other uses.
Stage 2- Understanding Future Requirements	Quantify the amount of employment land required across the main business sectors during the development plan period. This is achieved by accessing both demand and supply elements and assessing how they can be met in aggregate by the existing stock of business premises and by allocated sites. Account should also be taken of turnover of existing sites due to relocation or closures. Both short/medium term and strategic provisions need to be considered in this process.
Stage 3 – Identifying a ‘New’ portfolio of sites	Devise qualitative site appraisal criteria to determine which sites meet the occupier or developers need. Confirm the existing sites to be retained, replaced or released, and any gaps in the portfolio.

	<p>In this allocation, consideration should be given to previously used sites, and in the reallocation, the environmental impact of one site relative to others should be included. The results of Stage 2, together with this site appraisal should provide a robust justification for altering allocations for employment land."</p>
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3.9. The Employment Land Evaluation Framework as required by the RDS highlights the need for individual zoned sites to be fit for purpose and meet economic requirements. Also, reallocation of new uses to sites needs to consider the impacts of adjoining sites.

Belfast Metropolitan Area Plan 2015

3.10. The Belfast Metropolitan Area Plan 2015 identifies the site as part of a "Major Area of Existing Employment/Industry" and includes "undeveloped zonings from previous Area Plans" i.e. from BUAP 2001. The overall area including the subject site is given as 34.93 hectares. There is an area of 7.2 hectares of level brown-field land lying vacant on the site of a former engineering works in Dundonald Industrial Estate. This site has been vacant from before 2008 with no sign of development for industry. The analysis of market conditions in the area gives a more detailed picture of the reasons for vacant industrial land in Dundonald, which we develop further in Section 6.

3.11. In BMAP 2015 there is no evidence of assessment of the suitability of industrial/commercial sites to meet sustainable standards as required by the Employment Land Evaluation Framework in the RDS, apart from Key Site Requirements

PPS4 – Planning and Economic Development.

3.12. The key aim of PPS 4 is:
"to facilitate the economic development needs of the Region in ways consistent with the protection of the environment and the principles of sustainable developments".
 (p.1, PPS4)

3.13. The PPS Policy Objectives include objectives:
"to promote mixed-used development and improve integration between transport, economic development and other land uses including housing;" (p.7, PPS4)

and also:

"to ensure a high standard of quality and design for new economic development."
 (p.7, PPS4)

On Current Trends:

3.14. *"RDS direction continues to indicate that city/town centres should be first choice for various types of development, particularly retail, office and service developments, in order to reinforce the existing administrative and service function of many settlements, as well as creating new employment that is accessible to large sections of the population. However, as changing patterns of employment continue to impact*

on the land, property and infrastructure needs of the Northern Ireland economy, it is recognized that a more flexible approach has become increasingly necessary when determining the types of economic development that are acceptable in particular locations.” (p.8, PPS4)

- 3.15. These changes can be seen in the Development Plan Position Paper 3: Employment and Economic Development Sept 2015 which gives a figure of 61,664 jobs in Lisburn and Castlereagh of which 11% were jobs in manufacturing, 5% in construction and **83% in services.**

Forecasting supply and monitoring trends

- 3.16. From PPS 4:

“The RDS also recognizes that there is a need to safeguard the supply of land currently used for existing economic development from other competing uses in the urban area including housing, while taking into account whether it is still realistic to protect sites that have remained vacant or undeveloped for a considerable period of time. Within this context, location and accessibility are important factors that need to be considered and these are often subject to changing circumstances. Therefore it is clearly important that the overall quantity of land allocated for economic development purposes, as well as the location and type of economic development are closely monitored to ensure there is a continuous supply of land for economic purposes. Such monitoring will help to identify any shortfalls that may arise.” (p.10, PPS4)

- 3.17. The quality of land for economic purposes must begin to include any physical constraints, which mitigate against economic and operational development, otherwise the land is not attractive to developers.

- 3.18. The Department gave reassurance on this in response to the public consultation on PPS 4:

“The Department is conscious of the importance of regular monitoring and review in the development plan process to ensure there is a continuing stock of suitable land for such uses and that unsuitable land is de-zoned or reallocated for alternative proposals”.

Preparing Development Plans

- 3.19. Two relevant factors are:

*“ - the strategic objective of the RDS to focus development within urban areas.
- the potential contribution to regenerating existing urban areas, through economic development alone or as part of a mixed use approach.” (p.11, PPS4)*

- 3.20. Again the Department gave reassurance in the response to the public consultation on PPS 4.

“Opportunities for mixed use development, to which the Department is strongly committed will be identified in development plans, along with the broad range of uses considered acceptable on any particular site.”

Reallocation of Sites

3.21. As presented in Section 4 the proposal is to reallocate the subject site to a mixed-use development of economic employment and residential use. This proposal has qualitative advantages for the surrounding area and the topography of the site. The Department recognizes that reallocation of the site to other uses is a mixed use development.

3.22. The response to the public consultation on the PPS 4 is:

"The Department remains committed to the identification and reassessment of the economic development sites which are poorly located or have inadequate access during the preparation of development plans and this is reflected in the PPS."

3.23. PPS 4 contains a series of individual policies dealing with development management:

"The planning policies of this statement must therefore be read together and in conjunction with the relevant contents of the Department's development plans and other planning policy publications, including the Regional Development Strategy" (p.15, PPS4)

3.24. Policy PED 7 in PPS 4 is at first reading in contrast with the acceptance in the RDS and the remainder of the PPS 4 in reallocation of zoned sites for economic development that are not suitable:

*"Zoned land in all locations
Development that would result in the loss of land or buildings zoned for economic development use in a development (either existing areas or new allocations) to other uses will not be permitted unless the zoned land has been substantially developed for alternative uses." (p.29, PED7)*

The exceptions quoted do not fundamentally change the predominant industrial use. The secondary issue in PED 7 deals with Unzoned Land in Settlements which would result in the loss of Class B2, B3 or B4 use "or land last used for these purposes."

3.25. Again the Department's response to the Public Consultation on PPS 4 clarifies the position on PED 7:

"The policy has been substantially revised to address concerns about the potential loss of economic development land to other uses where the land is still considered viable for economic development use. The policy now makes it clear that the loss of zoned economic development land will normally only take place through the operation of the development plan process. The policy is now clearer about the exceptional circumstances when other uses might be permitted on existing unzoned economic development land in urban areas, where for instance land is no longer viable for economic development and the opportunity has also been taken to address this issue in the context of existing unzoned economic development land in the countryside."

The Planning Advice Note – Implementation of the Planning Policy for the Retention of Zoned Land and Economic Development Uses: November 2015

- 3.26. The advice note identified the introduction of the Strategic Planning Policy Statement for Northern Ireland (SPPS) 'Planning for Sustainable Development'. The SPPS covers all of Northern Ireland and must be taken into account in the presentation of development plans: *"and it is material to all decisions on individual planning applications and appeals."* (p.6, SPPS)
- 3.27. The SPPS has '*Supporting Sustainable Economic Growth as a Core Planning Principle*'. Another Core Planning Principle is Supporting Good Design and Positive Place Making. Important Regional Strategic Objectives to facilitate economic development are:
- *"Promote sustainable economic development in an environmentally sensitive manner,"* (p.56, SPPS)
 - *Promote mixed-use development and improve integration between transport, economic development and other land uses, including housing.*
 - *Ensure a high standard of quality and design for new economic development."* (p.57, SPPS)
- 3.28. The SPPS will operate in parallel with existing policies such as PPS 4. Any conflict arising between the SPPS and retained policies will be decided in favour of the SPPS unless the retained policy is more prescriptive than SPPS. When new Plan Strategies for the local Development Plans of all councils are adopted the retained Planning Policy Statements will be cancelled, although supplementary and best practice guidance *"will continue to apply."*
- 3.29. The SPPS enables councils to bring forward detailed operational policies through the plan process and tailored to local circumstances.
- 3.30. The SPPS supports sustainable economic growth allied with good design and positive place-making. It is therefore essential that the subject site plays it's part in a design vision for Dundonald where the issues that mitigate against the site being suitable for large commercial structures and large commercial vehicles can have positive benefits in using the existing topography more sympathetically as a mixed use area, linking to surrounding residential areas and towns by greenways for pedestrians and cyclists. Also to provide urban design which is permeable and fosters a sense of community through a 'street' environment.

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,
Lagan Valley Island,
Lisburn,
BT27 4RL

or send an email to: data.protection@lisburncastlereagh.gov.uk or telephone: 028 9244 7300.

Signature

Date