



Local Development Plan 2032 Counter Representation Form

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

SECTION A: DATA PROTECTION

In accordance with the Data Protection Act 2018, Lisburn & Castlereagh City Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure.

It should also be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure (DfI) as they will be considered as part of the Independent Examination (IE) process. For further guidance on how we hold your information please visit the privacy section at www.lisburncastlereagh.gov.uk/information/privacy.

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

By proceeding and signing this representation you confirm that you have read and understand the privacy notice above and give your consent for Lisburn & Castlereagh City Council to hold your personal data for the purposes outlined.

Please note that when you make a counter representation to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the Council's website. Copies of all counter representations will also be provided to DfI and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for IE. A Programme Officer will also have access to this information during the IE stages of the Plan preparation. DfI, the Programme Officer and the Independent Examiner will, upon receipt, be responsible for the processing of your data in line with prevailing legislation. If you wish to contact the council's Data Protection Officer, please write to:

Data Protection Officer
Lisburn & Castlereagh City Council,
Civic Headquarters,
Lagan Valley Island,
Lisburn,
BT27 4RL

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

SECTION B: YOUR DETAILS

Please tick one of the following:-

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

First Name

Carrie

Last Name

McDonagh

Details of Organisation / Body

One2One Planning Ltd

Address

1 Larkfield Avenue
Upper Lisburn Road, Belfast, BT10 0LY

Postcode

BT10 0LY

Email Address

carrie@one2one-planning.co.uk

Phone Number

[REDACTED]

Consent to Publish Response

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

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

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

SECTION C:

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

Yes No

If yes, please provide your Reference Number DPS 122

SECTION D: YOUR COUNTER REPRESENTATION

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

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

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

DPS 034 – North Lisburn Development Consortium

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

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

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

DPS – 034 requests additional lands within the SDL of Lisburn to be considered for housing with ancillary social care. My clients support this representation but consider an extension of the boundary more appropriate See attached sheet.

Signature

[Redacted Signature]

Date

13th May 2020

Thank you for your comments

DPS – 034 requests additional lands north of Derrigahy Road are included within the SDL of Lisburn and seeks their consideration for housing with ancillary social care.

The requested change is based on the housing requirement identified in the DPS being too low to address the housing market pressure that LCCC is experiencing and they consider that the calculation should be reviewed and increased. They raise the Councils attempt to include a buffer allowance for a further 10% to support the Councils aspiration for delivery of the Blaris strategic mixed use site. They consider the buffer provided by Blaris will have no impact as it is not likely to come on stream for 8 years and note that if the Council housing requirement is too low, then Lisburn has the potential to experience increased house prices and housing stress (page 9, para 14 and 15 of Inaltus submission ref 16/11 (26)(dps).

The author of DPS 034 considers it prudent to add a further 10% buffer allowance to relieve market pressures across all settlements in the plan area and seek lands north of Derrigahy Road to be included inside the SDL and zoned for housing as identified below at Figure 1: BMAP Extract with North Lisburn Consortium SDL extension request annotated approximately with red star.

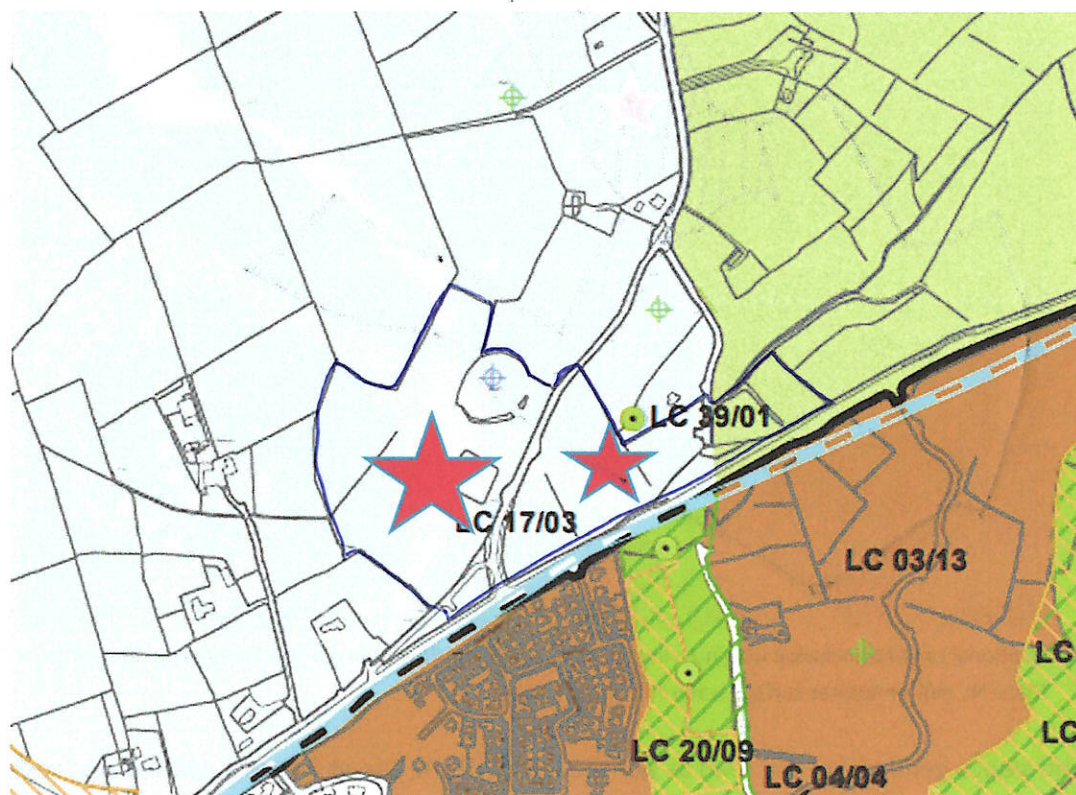


Figure 1: BMAP Extract with North Lisburn Consortium SDL extension request annotated approximately with red star

They consider this to make the plan sounder under CE3 and CE4. It is pointed out how the lands have quick and easy local access to all parts of Lisburn City and to Belfast via the M1 and the international airport via Dundrod. It is considered that the site would be preferential in the context of traffic and roads capacity when compared to other areas of housing growth in Lisburn (Page 11, Para 26 of Inaltus submission ref 16/11 (26) (dps).

My clients agree that this area north of Derriaghy Road should be included to provide enough land to facilitate a sustained build program but would ask that the site is extended to include additional land to the north east along the road frontage of Derriaghy Road for additional flexibility.

Like the site proposed within DPS 034, the expanded area would have no significant environmental constraints or flood issues as identified at Figure 2 below.

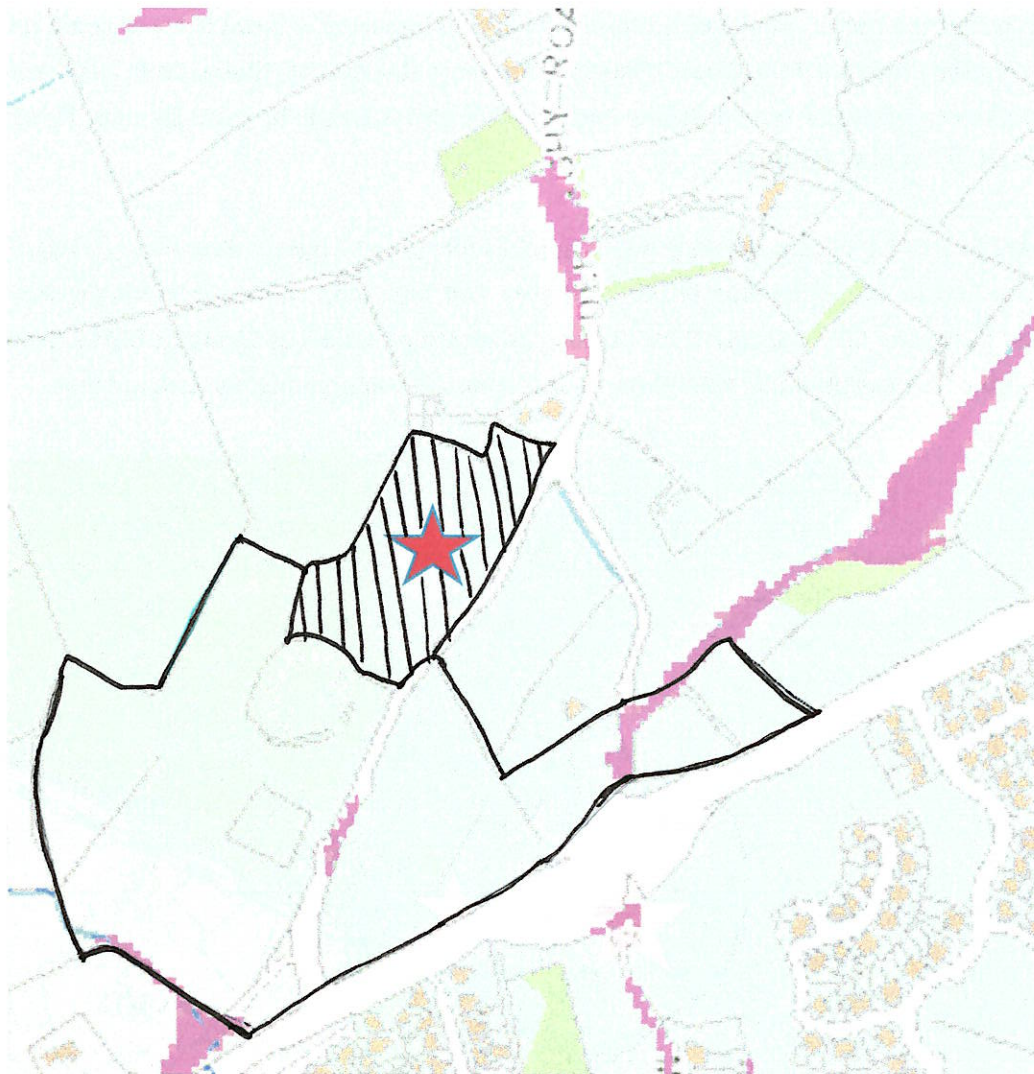


Figure 2: Additional Land for Inclusion within Zoning north of Derriaghy Road free for flood risk (as per extract from Flood Maps NI, pink annotates surface water flooding)

The land slopes gently from the road as per the image of the site at Figure 3, with strong vegetation buffers throughout and its inclusion would enable the extension of the community greenway network alongside Magheralave Road and could assist a comprehensive protection buffer zone around the Rath, expanding the open space and environmental benefits for the wider area.



Figure 3 – Requested Site to be incorporated in New Zoning North of Derriaghy Road

Does the requested change comply with the test of Soundness?

The extent of land sought within DPS 034 does not provide enough flexibility to deal with changing circumstances in accordance with soundness test CE 4 and the area should be extended further north east along Derriaghy Road to provide for a sufficient supply if the Blaris zoning does not deliver as anticipated by Council.

The inclusion of this field, along with adjacent lands sought within DPS 034 are appropriate and founded on robust evidence in line with soundness test CE2 and CE 4. The site is not subject to any protective or restrictive designations, offers a logical expansion to the settlement; with a suitable means of direct road access provided, and the potential to utilise the capacity of the North Lisburn feeder road.

While a matter for local policies plan, the landscape wedge is unaffected by the requested change to the DPS 034 boundary, ensuring the planned separation between Lisburn and Belfast is maintained and coalescence of the settlements avoided.

This area of Lisburn offers a greater opportunity for housing over the plan period and the requested revision to the site identified within objection DPS 034 would make the plan more sustainable by encouraging a more sustainable growth pattern in the Lisburn area (which has the access, services and facilities already available for that potential increase in population).

