



## Local Development Plan 2032 Counter Representation Form

Please complete this counter representation form and email to [LDP@lisburncastlereagh.gov.uk](mailto: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](http://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](http://www.lisburncastlereagh.gov.uk/LDP) or is available on request by emailing [LDP@lisburncastlereagh.gov.uk](mailto: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

Last Name

Details of Organisation / Body

Address

Postcode

Email Address

Phone Number

### 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 054 – Donaldson Planning ref LC06 - Milltown

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.



The objection relates to Milltown as the second largest of the villages, referring to its facilities and sets out challenges to soundness on the basis of the need for a long term strategy to cover the 15 year period. It refers to the plan as unsound as it fails to properly provide for a 5 year supply of land and the development management process. With specific reference to Milltown, the imbalances at the village level of the hierarchy are noted and reference made to the minimal availability of housing land in the village as per the housing monitor.

My client does not disagree with any of the above, however they do not consider the area of land suggested within DPS 054 for inclusion within the SDL to be the best option for modest housing development to meet those local needs. It is accepted that 37 Derriagh Road, which had been demolished in 2019 has permission for 2 No. replacement semi-detached dwellings granted however, to promote a more significant level of urban housing in this area would undermine the integrity of the landscape wedge to the eastern side of Milltown village.

If the village is to retain its more rural character it is essential that it is not consumed by the Belfast metropolitan area conurbation and the wedge provides a vital function in preventing that coalescence.

The site is also within the LLPA as set out below at Figure 1- BMAP Extract showing site context in LLPA and landscape wedge



Figure 1- BMAP Extract showing site context in LLPA and landscape wedge

While the exact boundary is to be defined at local policies stage, the significant tree cover at the entrance to this site as set out at Figure 2 below – Google extract showing significant tree cover fronting Derriagh Road, creates a quality area of amenity and nature conservation interest.

The trees form part of the character of the village and should be maintained.

(See attached sheet below for continuation)

Signature

[Redacted Signature]

Date

13<sup>th</sup> May 2020

Thank you for your comments



Figure 2 – Google extract showing significant tree cover fronting Derrriaghy Road



Figure 3: Google extract showing lack of quality field boundary and poor access lane

The requested change 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 nor an alternative based on evidence.



