

Local Development Plan 2032 Counter Representation Form

Section A: Data Protection

Q1. DATA PROTECTION AND CONSENT

I confirm that I have read and understand the Privacy Notice above and I give consent for Lisburn & Castlereagh City Council to hold my personal data for the purposes outlined.

SECTION B: YOUR DETAILS

Q2. Please tick one of the following:

Other

Q3. Your Details

First Name [REDACTED]

Last Name [REDACTED]

Details of Organisation/ Body On behalf of residents of Nevin's Row

Address [REDACTED]

Postcode [REDACTED]

Email Address [REDACTED]

Phone Number [REDACTED]

Q4. 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

Section C:

Q5. Have you submitted a representation to the council regarding this development plan document

No

Section D: Your Counter Representation

Q6. 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 online response for each counter representation you wish to make.

DPS-035 - Inaltus Limited on behalf of Porter Homes

Q7. 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.

Several residents of Nevins Row have already submitted comments in order to be sure to comply with the Council's timetable. Now that we have had time to fully study the relevant documents, these comments expand on those previously made, tying them more explicitly to the Council's tests of soundness.

Our support of the Council's draft Plan Strategy, and opposition to the representation on behalf of Porter Homes, concerns Chapter 4 of the draft Plan Strategy (Part 1): Strategic Policies and Spatial Strategy, in particular the following two sub-sections:

D: An Attractive Place - Promoting Sustainable Tourism, Outdoor Space Sport and Outdoor Recreation.

E: A Green Place - Protecting and Enhancing the Historic and Natural Environment.

Our opposition to the representation on behalf of Porter Homes centres on the proposal to re-zone an area of land in Ballyskeagh, although many of our comments would apply equally to the proposed re-zoning further along the Ballyskeagh Road at Drumbeg.

The table on page 49 lists Ballyskeagh as a Small Settlement.

On page 173 Small Settlements are described as:

"...a focal point for the rural community and take the form of a rural cluster or cross roads development where consolidation of the built form can provide opportunity for individual dwellings and/or small groups of houses and small rural businesses. Mostly Infill and small scale opportunities available for housing and other opportunities to sustain rural communities without changing the character of these settlements."

Previous submissions have drawn attention to infrastructure problems:

1. Any proposed development would add to the traffic over the two bridges on the Ballyskeagh Road - over the Lagan River and the Lagan Canal (The latter, Ballyskeagh Bridge, is listed). Neither of these two bridges is wide enough to consistently maintain two streams of traffic, and often cannot cope.
2. The area outlined in Porter Homes' MPS-035C abuts the Lagan towpath. We have seen this area recently flooded.
3. The sewage system is near capacity.

Before outlining our main objections to Porter Homes' proposal we would like to point out two concerns with it: first the exact dimensions of the land involved; and secondly the state of buildings already on it.

To take the exact dimensions of the land involved:

Porter Homes' submission DPS-035 states on page 11: "TS6 in respect of Ballyskeagh The Settlement Character Appraisal finds there is "limited land supply remaining of approximately 0.2 hectares in the existing settlement to accommodate future development opportunities" The lands identified as suitable for future development would be our client's lands at the southwest of the settlement and is (sic) available for development. These lands should be included for housing in the Plan."

The quote from page 128 of The Local Development Plan Technical Supplement 6 (TS6), Appendix 2, Settlement Appraisals concerning Ballyskeagh, is correct, but the accompanying map, MPS-035C Ballyskeagh, indicates two areas totalling approximately 4hectares - 20 times the size! It is important to note the scale of development proposed - massive when compared with the existing settlement.

Secondly the state of buildings already on a small part of the land proposed for development:

DPS-035 page 40:" Ballyskeagh is a small settlement in the LCCC area and our client's land are (sic) located abutting the southwest corner of the settlement boundary. They are a derelict group of dwelling and farm buildings, prime for regeneration and redevelopment. Access to the Ballyskeagh Road is already available. Zoning these lands will remove an eyesore in the area and support a modest increase in the local population."

Now the Council designates a number of Local Landscape Policy Areas. TS6 describes them on page 10 :

"Local Landscape Policy Areas (LLPAs) are designated within or adjoining settlements on lands considered to be of greatest nature conservation or heritage interest, amenity value, landscape quality or local significance. There are 116 LLPAs within the Council area..."

TS6 Appendix 2 p127 describes (in Ballyskeagh) "Two designated LLPAs around a two storey farm house on Ballyskeagh Road, dating from 1830s and another one including the Lock Keeper's House..." (TS6 continues about the second LLPA.)

Porter Homes describe a derelict eyesore; the Council describes an LLPA. They are both talking about the same buildings.

How did an 1830s farmhouse, one of the Council's 116 LLPAs, become a a derelict eyesore?

The answer is Porter Homes.

When they were occupied, they were an asset to the area. Now that the farmhouse and outbuildings are owned by Porter Homes, and are vacant, they have deteriorated. Porter Homes' neglect has caused their deterioration into an eyesore.

We are all too familiar with developers neglecting their buildings and then using the resulting deterioration as a lever to obtain favourable planning decisions. I hope that the Council tells Porter Homes that there is no place for such tactics in Lisburn and Castlereagh.

But to turn to our main objections:

We are discussing a proposed development in an Area of Outstanding Natural Beauty.

At the beginning of Chapter 4, the map on page 48 shows that Ballyskeagh is within the only Nationally Designated Area of Outstanding Natural Beauty in the LCCC area - around the Lagan Valley Regional Park.

Among other things, Section 4D supports the following outcomes (pages 108, 109):

3D – There is good access to countryside and other green spaces for everyone.

4A – The built and natural environment is protected and enhanced.

Section 4E, states on page 127: "The Lagan Valley Regional Park (LVRP) is a significant natural environmental asset within the Council area and is safeguarded to ensure its natural beauty and character is retained. The park remains as a major regional recreational asset benefitting from its statutory designation as an Area of Outstanding Natural Beauty (AONB) which was designated in 1965 and largely aligns with the boundary of the LVRP. This AONB has been designated in recognition of its importance as a landscape of distinctive character and special scenic value. The designation is designed to protect and enhance the qualities of the area and to promote it for the enjoyment of the public."

Porter Homes' submission talks of 'joining nodes'.

The term "Node" is used in various contexts to describe groups of buildings, but the document, Lisburn's Lagan Corridor Strategic Framework describes a series of "Nodes and Links" where:

"...informal and formal nodes of activity are identified and enhanced along the length of the corridor

connected to one another by green Links, thereby creating stretches of tranquillity interspersed with Nodes of activity."

Ballyskeagh and Drumbeg are identified as Nodes. Joining the nodes as proposed by Porter Homes is in direct violation of this policy. Every time built-up nodes are joined, an area of the natural environment is divided in two by a swathe of concrete.

Part 2 (Operational Policies) of the draft Plan Strategy details on page 88 the particularly stringent requirements for planning permission to be granted for developments in Areas of Outstanding Natural Beauty, and goes on to state that:

"The quality, character and heritage value of the landscape of an AONB lies in their tranquillity, cultural associations, distinctiveness, conservation interest, visual appeal and amenity value."

As inhabitants of this AONB we feel duty bound to protect it and support the Council's draft Plan Strategy against what can only be described as an attack from Porter Homes.

This document has the full backing of the following residents of Nevin's Row:

Number 2: [REDACTED]
Number 6: [REDACTED]
Number 7: [REDACTED]
Number 9: [REDACTED]
Number 10: [REDACTED]
Number 11: is vacant
Number 14: is vacant
Number 16: [REDACTED]

Most of the residents listed above have been long term residents of the Row from 10 years to 27 years. We are in the process of consulting with with the rest of the residents in the Row, Number 1, 3, 4, 5, 8, 12, 13, and 15, it is envisaged that these neighbours will be in agreement with this document based on previous informal conversations. We are also consulting with wider neighbours in Ballyskeagh.

Section E:

Q8. Thank you for your comments

Signature [REDACTED]

Date 18 June 2020