

# Local Development Plan 2032 Consultation Survey

## Section A- Data Protection And Consent

### Q1. DATA PROTECTION AND CONSENT

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

## Section B- Your Details

Q2. Please specify the capacity in which you are responding by ticking one of the following boxes. If you are responding as a planning consultant, agent or representing an organisation you will be the main point of contact for your client or organisation

Planning Consultant/ Agent

### Q3. Your Details

**Name**

**Details of Organisation/ Body** MCCREADY ARCHITECTS

**Address** 8 MARKET PLACE

**Postcode** BT28 1AN

**Email Address** ■■■■■■■■■■

**Phone Number** 028 92662357

## Consent to Publish Response

Q4. 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 Notice detailed in Section A.

Please publish with only my organisation

## Section C: Your Representation

Q5. 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.

I believe it to be UNSOUND

Q6. If you have any additional information to upload in order to explain your SOUND views please do so

*No Response*

## PLAN COMPONENT - To which part of the Plan Strategy does your comment relate?

Q7. PLEASE SELECT ONLY ONE ISSUE IN EITHER PART 1 (CHAPTER 1 TO 5) OR PART 2 (OPERATIONAL POLICY)

Chapter 4B- Driving Sustainable Economic Growth

**Policy Reference**

STRATEGIC POLICIES 12 & OPERATIONAL POLICY ED3

## Soundness Test No:

Q8. 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](https://www.planningni.gov.uk/index/s/development_plan_practice_note_06_soundness__version_2__may_2017_.pdf))

C1 Did the council take account of the Regional Development Strategy?

C3 Did the council take account of policy and guidance issued by the Department?

CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?

## 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. If additional space is required please upload by clicking below.

SEE ATTACHED

## MODIFICATIONS

Q9. 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 be as precise as possible. If additional space is required please upload your information by clicking below.

SEE ATTACHED

Q10. If you have additional information to upload please do so here

- File: 09.20 LCCC Submission.pdf

Q11. If you wish to submit further information please click below:

Representation Complete

## PLAN COMPONENT

Q12. PLEASE SELECT ONLY ONE ISSUE IN EITHER PART 1 (CHAPTER 1 TO 5) OR PART 2 (OPERATIONAL POLICY)

*No Response*

## Soundness Test No:

Q13. 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](https://www.planningni.gov.uk/index/s/development_plan_practice_note_06_soundness__version_2__may_2017_.pdf) )

*No Response*

## 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. If additional space is required please upload by clicking below.

*No Response*

## MODIFICATIONS

Q14. 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 be as precise as possible. If additional space is required please upload by clicking below.

*No Response*

Q15. If you have additional information to upload please do so here

*No Response*

Q16. If you wish to submit further information please click below:

*No Response*

## PLAN COMPONENT

Q17. PLEASE SELECT ONLY ONE ISSUE IN EITHER PART 1 (CHAPTER 1 TO 5) OR PART 2 (OPERATIONAL POLICY)

*No Response*

## Soundness Test No:

Q18. 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](https://www.planningni.gov.uk/index/s/development_plan_practice_note_06_soundness__version_2__may_2017_.pdf) )

*No Response*

## 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. If additional space is required please upload by clicking below.

*No Response*

## Modifications

Q19. 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 be as precise as possible. If additional space is required please upload by clicking below.

*No Response*

Q20. If you wish to submit further representations you will need to complete a new questionnaire

*No Response*

**SECTION C: DEALING WITH YOUR REPRESENTATION**

Q21. INDEPENDENT EXAMINATION Please indicate how you would like your representation to be dealt with. 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.

Written Representation



## RESPONSE TO DRAFT PLAN STRATEGY

LISBURN CASTLEREAGH CITY COUNCIL

SUBJECT

INDUSTRIAL / COMMERCIAL SITE

GLENAVY ROAD

UPPER BALLINDERRY

OUR REF 09.20

SUBMISSION DATE 09.01.2020

### 1.0 INTRODUCTION

1.1 The Draft Plan Strategy will not provide the necessary and appropriate even growth across the plan area for sustainable economic growth.

1.2 The existing industrial / commercial land use at Glenavy Road Upper Ballinderry could provide an ideal opportunity to provide a small extension to this land use and provide for sustainable economic growth at this location.

1.3 The location of this proposed site within the LCCC area is an attractive location for a limited extension to the adjacent land use and would present good planning.

1.4 There is a clear imbalance of land for economic growth in the plan area with the large allocation in "West Lisburn". This clearly favours very large very well resources organisations at the expense of small modestly resources local based organisations.

1.5 To address this imbalance and provide an attractive and desirable choice in terms of location the lands identified on the attached map should be included to enable the limited and controlled growth of economic growth.

1.6 The plan period would appear to be too short as it is likely to be some time before it becomes an adopted plan as past Development Plan experience demonstrates. It may well take a further 2 - 3 years before the plan is adopted and that would leave it with a life of 9 - 10 years some 5 - 6 years short of the required 15 year requirement. This will limit what should be its reasonably long term objectives.

1.7 The emphasis in the Draft Plan Strategy appears to allocate economic growth opportunities within the largest "settlement" Lisburn City although it should not do so at the expense of other areas of the plan area and provide important alternatives.

1.8 Providing limited economic development opportunities also helps to maintain family / generational links as it in some way meets the demand across the rural plan area and sustains the overall strength of local and surrounding rural communities without impacting on the countryside.

### 2.0 SOUNDNESS

2.1 The Draft Plan Strategy is unsound on C1 as it does not ensure the strength of rural community living in villages and settlements through the the proposed housing strategy.

2.2 The Draft Plan Strategy is unsound on C3 as it does not ensure a realistic plan period in that will be effective for less than 15 years.

2.3 The Draft Plan Strategy is unsound on CE2 as it does not address the imbalance in land availability across the plans settlement hierarchy and plan area at village and settlement level.

### 3.0 PROPOSALS

3.1 This proposal will help to provide sufficient choice of economic development allocation.

3.2 With regards the delivery of the plan past Area Plan experience shows that for various reasons allocated lands is not always developed within the plan period.

3.3 Failure to develop even a part of the Lisburn West allocation could have a significant negative impact on the delivery of the Plans objectives and the growth of the Council area.

3.4 This needs to be addressed by a more even distribution of economic development land allocation enabling the delivery of development opportunities in an affordable way and provide smaller development sites falling within the resources of many small locally based developers and building contractors.

### 4.0 CONCLUSIONS

4.1 In summary the Plan is unsound as:-

4.12 The plan strategy will not deliver strong rural community living for small towns villages and settlements

4.13 The plan period is too short to deliver an effective long term plan

4.14 The plan fails to deliver a balanced spread of new economic development opportunities

4.15 In addition the inclusion of the proposed lands as shown on the attached map within the Draft Plan Strategy will;-

4.16 Provide a natural extension to the existing adjacent land use

4.17 Allow it to naturally grow while contains by existing features

4.18 Provide a more even spread of of economic development opportunities across the plan area



**Single**

**Emap**

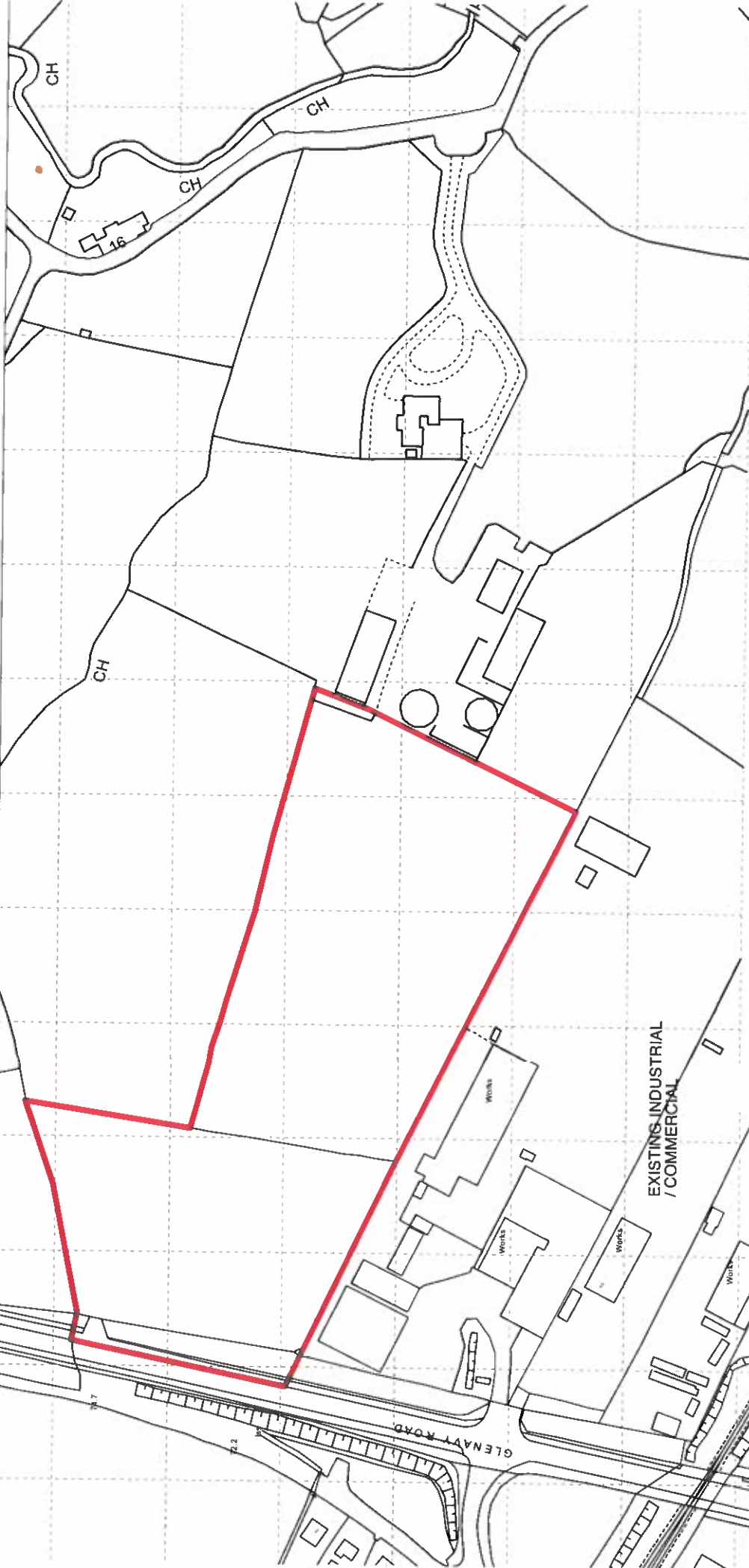
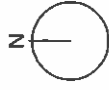
AVY ROAD, BALLYSCOLLY, UPPER BALLINDERRY, BT,

Date: 06/12/2017

Customer Ref: richard auld

Point (Easting, Northing): 316937, 367731

EECHES, TEMPLE ROAD, BALLYSCOLLY, UPPER BALLINDERRY, BT28 2PD, 186011440



**Client:**

**Project:** EXTENSION TO COMMERCIAL USE GLENAVY ROAD UPPER BALLINDERRY

**Drawing:** SITE LOCATION PLAN

**Scale:** 1:2500

**Date:**

**Drawing No:** 09.20 / 01

**Rev:**

OS 145.15SE  
CORNW COPYRIGT

LAND OUTLINED RED

**McCREADY | ARCHITECTS**

Chartered Architects and Planning Consultants

8 Market Place

Lisburn

BT28 1AN

T: 028 9266 2357

F: 028 9266 2263

E: [mail@mccreadyarchitects.co.uk](mailto:mail@mccreadyarchitects.co.uk)

W: [www.mccreadyarchitects.co.uk](http://www.mccreadyarchitects.co.uk)