

Preferred Options Paper

Response Form

Lisburn & Castlereagh City Council has commenced preparation of its first Local Development Plan (LDP). The LDP will be produced in two parts consisting firstly of a Plan Strategy followed by a Local Policies Plan:

- **The Plan Strategy** will set the aims, objectives, growth strategy and strategic policies applicable to the Plan area.
- **The Local Policies Plan** will provide site specific policies and proposals, including settlement limits, land use zonings and environmental designations.

Both documents will guide future growth and development and provide the policy context for the consideration of applications for planning permission.

The Council wants your views on the **Preferred Options Paper (POP)** - the first stage in the preparation of the LDP which will inform the Plan Strategy. All documentation for the POP can be viewed at www.lisburncastlereagh.gov.uk/resident/planning/local-development-plan

The easiest and quickest way to comment is by using the online questionnaire which is available on the Council's website at www.lisburncastlereagh.gov.uk/resident/planning/local-development-plan

Alternatively, please complete and return this questionnaire by email to LDP@lisburncastlereagh.gov.uk or download a copy of this form and post to: **Development Plan Team, Civic Headquarters, Lagan Valley Island, Lisburn, Co. Antrim, BT27 4RL**. Responses must be received no later than **5pm on Thursday 25th May 2017**.

Please note that in order for comments to be considered valid you must include your contact details. We will use these details to confirm receipt of comments and to seek clarification or request further information. ***Anonymous comments or comments which do not directly relate to the Preferred Options Paper will not be considered as part of the consultation process.***

Comments made on this consultation will be made public, which may include identifying details such as your name or organisation. Should you have any concerns regarding the holding of such information please contact LDP@lisburncastlereagh.gov.uk

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Essential supporting documents such as maps or images may be submitted with this response form and sent to LDP@lisburncastlereagh.gov.uk

Please indicate whether you will be submitting supporting documents.

Yes No

If you are sending supporting documents, please list the titles of those documents here:

NIRIG Cover Letter

Your comments are sought on the Preferred Options Paper and each of the identified Preferred Options. Please indicate whether you agree with the Council's Preferred Option or one of the alternative options.

These questions are ordered in accordance with the Preferred Options Paper. Please read each section before answering the question. Should you continue on a separate sheet, please number your response in accordance with the relevant Option.

Preferred Options Paper

Sections 1-4:

Q1 Do you have any comments on the opening Sections 1-4 of the Preferred Options Paper that should be taken into account when preparing the Plan Strategy?

Make a comment here:

In the Introduction (Section 1) of the POP Document reference is made to a number of Preparatory Papers which establish the baseline for the social, economic and environmental issues to be addressed through the Plan. These include for example Population and Growth, Housing and Settlements, Employment and Economic Development and Telecommunications, Public Services and Utilities etc

NIRIG have concerns that the topic of Energy and Climate Change is not included as one of the Preparatory Papers. As a result the LDP may not be fully informed in terms of strategic planning for its Energy Future or Climate Change Mitigation. Furthermore, it may not position itself to fully avail of the opportunities on offer from the Energy Sector/Green Economy. Renewable energy represents a significant opportunity for Northern Ireland in progressing to a low-carbon economy, promoting energy sustainability, improving security of supply and providing a significant economic boost through job creation, commercial rates, community benefit and attracting inward foreign investment. There is potential to develop new businesses and industry sectors linked to climate change. The development of the clean-tech industry for example is a growth opportunity and will enable Lisburn & Castlereagh City Council to promote and position itself to compete.

Section 5: Growth Strategy and Spatial Framework

Q2 Do you agree with the aims of the Council's Growth Strategy and Spatial Framework as outlined in Section 5 of the Preferred Options Paper?

Yes No

Make a comment here:

NIRIG have concerns that no reference is made within the "aims" to Energy Infrastructure, Green Economy and/or Climate Change. NIRIG believe it would be enormously beneficial to include a specific aim on Energy and Climate Change to give clear direction on the issue.

The International Panel on Climate Change (IPCC) has put forward its clear assessment that the window for action on climate change is rapidly closing and that renewable energy sources such as wind will have to grow from 30% of global electricity at present to 80% by 2050 if we are to limit global warming to below 2 degrees¹ above pre-industrial levels.

Cities hold a crucial role in mitigating the effects of climate change. The world's cities account for approximately three-quarters of global greenhouse gas emissions. Energy use, and the behaviour and habits of citizens will dictate whether we are able to reduce emissions to the extent needed to avoid dangerous climate change.

The electricity sector is already rapidly developing away from a reliance on fossil fuels. Lisburn & Castlereagh City Council can lead the way in encouraging low-carbon development by sending out a strong signal on further reductions in the city's reliance on fossil fuels. Electrification of heat and transport could also bring a wealth of economic and environmental benefits to the city.¹

Converting the transport and heating/cooling industries away from fossil fuels and into increasingly low carbon electricity would be hugely significant in cutting carbon emissions and improving air quality.¹ Increased use of electricity in heating and cooling could create annual savings of €44.7 billion (£37.36bn) across Europe, and Lisburn & Castlereagh City Council should create the conditions that will enable these savings to be realised locally. Switching to electricity will not only reduce carbon dioxide and fossil fuel imports, it will also provide Lisburn & Castlereagh City Council Area with cleaner air.

In the absence of clear direction on low-carbon cities from national government, cities such as Bristol, Leeds and London have developed city climate strategies, and are now among the world's leading sustainable cities. Bristol now has the highest employment rate of all the core UK cities and has been recognised as the 2015 European Green Capital.

We urge Lisburn & Castlereagh City Council to give serious consideration to developing an ambitious plan for a low-carbon city, which will deliver economic, environmental and health benefits across the city.

Q3 Do you agree with the cross-cutting themes outlined in Section 5 of the Preferred Options Paper?

Yes No

Make a comment here:

NIRIG welcomes the inclusion of “Climate Change” within the “cross cutting themes” referenced in Section 5, and the following reference to renewables;

“Renewables will be encouraged where they are appropriate in scale and location.”

However, NIRIG believes that the above statement does not go far enough and would like to see specific targets and timelines for renewable energy roll out within Lisburn Castlereagh City Council Area. NIRIG would encourage Lisburn & Castlereagh City Council to develop a Renewable Energy Strategy to enable proper planning and strategic development of the renewable energy resource in their local area to fully avail of the opportunities that his sector can bring.

Section 6: Vision and Strategic Objectives

Q4 Do you agree with the Vision of the LDP (shared with the Community Plan) outlined in Section 6?

Yes No

Make a comment here:

We strongly encourage the Council to commit more fully within their vision and LDP in establishing a more positive strategy in terms of the role renewable electricity and the Green Economy can play in facilitating a sustainable economic framework. NIRIG has concerns that the POP does not go far enough in terms of positioning itself to avail of the economic benefits that renewable energy can bring to an area. NIRIG believes that renewable energy represents the single greatest opportunity for Northern Ireland to:

- transition to a low-carbon economy;
- promote energy sustainability; and
- improve security of supply.

Further benefits brought about by a low carbon economy include:

- improvements in air quality;
- the provision of a significant economic boost through job creation, technology innovation and commercial rates; and
- the attraction of foreign direct investment from, for example, major global businesses who now are committed to securing a 100% renewable energy supply between 2020 and 2030¹.

¹ <http://re100.org> The world's most influential companies, committed to 100% renewable power

Q5 Do you agree with the Strategic objectives (A-F) of the LDP outlined in Section 6?

Yes No

Make a comment here:

NIRIG welcome the following insert under Objective E

“To contribute to reducing climate change by minimising greenhouse gas emissions, mitigating and adapting to climate change and building in flood resilience.

- To support renewables infrastructure whilst affording protection to the environment including landscape impacts of wind energy.*
- To support recycling and reduction”*

We would also encourage the inclusion of an economic strategy to avail of the benefits of renewable energy and the Green Economy to be inserted under Objective B – Driving Sustainable Economic Growth. NIRIG suggest the following;

“To develop a Green Economy Strategy to avail of the economic benefits and opportunities that this new sector can bring.”

Section 7: Key Issues and Options

Q6 Key Issue 1: The Settlement Hierarchy

(Please refer to Section 7A of the Preferred Options Paper for full details)

Please choose **only one** of the following:

- OPTION 1A – PREFERRED OPTION – Retain the existing Settlement Hierarchy with limited amendments**
- Option 1B– Retain the existing Settlement Hierarchy with no change**

Make a comment on your choice here:

Q7 Key Issue 2: Facilitating Future Housing Growth (Settlements)

(Please refer to Section 7A of the Preferred Options Paper for full details)

Please choose **only one** of the following:

- OPTION 2A – PREFERRED OPTION - Focus future Housing Growth in Lisburn City with limited dispersal in the remaining settlement hierarchy, taking into account any constraints**
- Option 2B – Focus future Housing Growth in Lisburn City**
- Option 2C – Protect Existing Housing Zonings**

Make a comment on your choice here:

Q8 Key Issue 3: Facilitating Sustainable Housing in the Countryside

(Please refer to Section 7A of the Preferred Options Paper for full details)

Please choose **only one** of the following:

- OPTION 3A – PREFERRED OPTION - Retention of Existing Rural Policy-Led Approach**
- Option 3B – Retention of Existing Rural Policy-Led Approach plus identify “Special Countryside Areas”**

Make a comment on your choice here

Q9 Key Issue 4: Facilitating Education, Health, Community & Cultural Facilities

(Please refer to Section 7A of the Preferred Option Paper for full details)

OPTION 4A - PREFERRED OPTION– Land identified for education, health, community or cultural uses by the relevant providers will be protected from development for alternative uses through the new Local Development Plan

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q10 Key Issue 5: Safeguarding Existing Employment Land

(Please refer to Section 7B of the Preferred Option Paper for full details)

Please choose **only one** of the following:

- OPTION 5A – PREFERRED OPTION - Maintain the current provision of land zoned for employment (with the exception of the West Lisburn/Blaris Major Employment Location)**

- Option 5B – Redesignate sites which are currently zoned as employment land for alternative uses**
- Option 5C – Increase current levels of zoned employment land**

Make a comment on your choice here:

Q11 Key Issue 6: West Lisburn/Blaris Major Employment Location (MEL)

(Please refer to Section 7B of the Preferred Option Paper for full details)

Please choose **only one** of the following:

- OPTION 6A – PREFERRED OPTION - Redesignate the Blaris Major Employment Zoning as a Mixed Use site**
- Option 6B – Redesignate the Blaris Major Employment Zoning as two separate zonings for housing and employment**
- Option 6C - Retain the existing Blaris Major Employment Zoning for employment purposes only**

Make a comment on your choice here:

Q12 Key Issue 7: Purdysburn Mixed Use Site Major Employment Location (MEL)

(Please refer to Section 7B of the Preferred Option Paper for full details)

OPTION 7A – PREFERRED OPTION - Retain the existing Purdysburn Major Employment Location as a Mixed Use site

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q13 Key Issue 8: The Maze Lands Strategic Land Reserve of Regional Importance

(Please refer to Section 7B of the Preferred Option Paper for full details)

OPTION 8A – PREFERRED OPTION - Retain designation of the Maze Lands as a Strategic Land Reserve of Regional Importance

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q14 Key Issue 9: Facilitating Sustainable Rural Economic Development in the Countryside

(Please refer to Section 7B of the Preferred Options Paper for full details)

Please choose **only one** of the following:

 OPTION 9A – PREFERRED OPTION - Retention of the existing policy-led approach

- Option 9B – Retention of the existing policy-led approach but in addition allow for the possible creation of ‘Rural Business Development Zones’ in a limited number of key/strategic locations**

Make a comment on your choice here:

Q15 Key Issue 10: Mineral Safeguarding Zones and Areas of Mineral Constraint

(Please refer to Section 7B of the Preferred Options Paper for full details)

Please choose **only one** of the following:

- OPTION 10A - PREFERRED OPTION - Provide Mineral Safeguarding Zones and Areas of Mineral Constraint in addition to the existing policy-led approach in relation to Mineral Development**
- Option 10B - Retain the existing policy-led approach in relation to Mineral Development**

Make a comment on your choice here:

Q16 Key Issue 11: Growing Lisburn City Centre

(Please refer to Section 7C of the Preferred Options Paper for full details)

Please choose **only one** of the following:

- OPTION 11A – PREFERRED OPTION - Extend the existing City Centre boundary**

Option 11B - Retain the existing City Centre boundary

Make a comment on your choice here:

Q17 Key Issue 12: Strengthening Existing Town Centres

(Please refer to Section 7C of the Preferred Options Paper for full details)

Please choose **only one** of the following:

OPTION 12A – PREFERRED OPTION - Retain the existing town centre of Carryduff and designate town centre boundaries in the historic towns of Hillsborough and Moira

Option 12B – Retain the existing town centre of Carryduff

Make a comment on your choice here:

Q18 Key Issue 13: Sprucefield Regional Shopping Centre

(Please refer to Section 7C of the Preferred Options Paper for full details)

Please choose **only one** of the following:

- OPTION 13A – PREFERRED OPTION - Retain and reinforce Sprucefield as a Regional Shopping Centre**
- Option 13B – Retain Sprucefield Regional Shopping Centre but extend uses to include recreation and leisure**

Make a comment on your choice here:

Q19 Key Issue 14: Strengthening District & Local Centres

(Please refer to Section 7C of the Preferred Options Paper for full details)

Please choose **only one** of the following:

- OPTION 14A – PREFERRED OPTION - Extend District and Local Centre Boundaries**
- Option 14B – Retain the existing boundaries at Forestside District Centre and Dundonald Local Centre**

Make a comment on your choice here:

Q20 Key Issue 15: Growing the Night Time Economy

(Please refer to Section 7C of the Preferred Options Paper for full details)

OPTION 15A – PREFERRED OPTION - Grow the Night Time Economy

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q21 Key Issue 16: Promoting Office Development within the City, Town, District and Local Centres

(Please refer to Section 7C of the Preferred Options Paper for full details)

OPTION 16A – PREFERRED OPTION - Promoting Office Development within the City, Town, District and Local Centres¹

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q22 Key Issue 17: City Centre Development Opportunity Sites

(Please refer to Section 7C of the Preferred Options Paper for full details)

¹ Office development is also permitted within the Major Employment Locations (MELs) See Options 6 & 7

OPTION 17A – PREFERRED OPTION - Identify potential Development Opportunity Sites within Lisburn City Centre

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q23 Key Issue 18: Promoting Hillsborough Castle as a Key Tourism Destination

(Please refer to Section 7D of the Preferred Options Paper for full details)

PREFERRED OPTION 18A – PREFERRED OPTION - Promote Hillsborough Castle as a Key Tourism Destination

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q24 Key Issue 19: Promoting the Lagan Navigation as a Key Tourism / Recreation Opportunity Area

(Please refer to Section 7D of the Preferred Options Paper for full details)

OPTION 19A– PREFERRED OPTION - Promote the implementation of the Lagan Navigation as a key Tourism / Recreation Opportunity Area

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q25 Key Issue 20: Protecting and Promoting the Lagan Valley Regional Park as a Key Tourism / Recreation Opportunity Area

(Please refer to Section 7D of the Preferred Options Paper for full details)

Please choose **only one** of the following:

OPTION 20A – PREFERRED OPTION - Protect and Promote the Lagan Valley Regional Park as a rich natural asset, retaining and enhancing the Lagan Valley Regional Park Nodes

Option 20B – Protect and promote the Lagan Valley Regional Park as a rich natural asset, but in addition provide opportunity to identify a limited number of potential new nodes (where possible)

Make a comment on your choice here:

Q26 Key Issue 21: Protecting and Enhancing Open Space, Sport & Outdoor Recreation

(Please refer to Section 7D of the Preferred Options Paper for full details)

Please choose **only one** of the following:

OPTION 21A - PREFERRED OPTION – Protect and enhance all areas of open space and provide opportunity to identify a limited number of potential new Community Greenways (where possible)

Option 21B – Protect and enhance all areas of open space

Make a comment on your choice here:

Q27 Key Issue 22: Retention of Key Transportation Infrastructure Schemes (Road and Rail)

(Please refer to Section 7E of the Preferred Options Paper for full details)

OPTION 22A - PREFERRED OPTION – Retain a number of key transportation infrastructure schemes to enhance accessibility within the area (Roads Option, Rail Option, Disused Rail and Connectivity)

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q28 Key Issue 23: Retention of Key Park & Ride Sites

(Please refer to Section 7E of the Preferred Options Paper for full details)

Please choose **only one** of the following:

OPTION 23A - PREFERRED OPTION - Retain a number of key Park & Ride Sites with identification of potential new Park & Ride / Park & Share sites

Option 23B - Retain a number of key Park & Ride Sites

Make a comment on your choice here:

Q29 Key Issue 24: Promoting Active Travel (walking, cycling and public transport)

(Please refer to Section 7E of the Preferred Options Paper for full details)

OPTION 24A - PREFERRED OPTION - Promote Active Travel in all new development (within Urban Areas / Settlements) to demonstrate how the development integrates with existing public transport, walking and cycling.

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q30 Key Issue 25: Connecting People and Places – Greenways

(Please refer to Section 7E of the Preferred Options Paper for full details)

OPTION 25A - PREFERRED OPTION - Protect and develop safe, shared and accessible Greenways connecting communities, promoting walking and cycling, recreational and social interaction and enhancing health and wellbeing.

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q31 Key Issue 26: Renewable Energy

(Please refer to Section 7E of the Preferred Options Paper for full details)

Please choose **only one** of the following:

- OPTION 26A - PREFERRED OPTION - Introduce Areas of Constraint in relation to renewable development (wind turbines)**
- Option 26B - Retain the existing policy-led approach in relation to renewable development.**

Make a comment on your choice here:

In relation to Key Issue 26: Renewable Energy NIRIG is in favour of **Option 26 B**. This option facilitates the development of the Council's renewable energy. Please see below notes.

A new Local Development Plan (LDP) system is a key component of any Planning Policy. While we agree in principle with this approach, we strongly request that Local Development Plan and policies to **unambiguously align with national policies, frameworks and strategies** such as PPS18. The hierarchy of these should be explicitly stated and their application ensured by appropriate mechanisms and given the contribution of renewable energy to combating climate change, we would welcome the inclusion of the requirement for accommodating renewable energy targets within the local development plan and that Lisburn & Castlereagh City Council would be in a position to deal with mitigating and adapting to climate change. The principles and objectives outlined in the SEF2 reflecting the renewable energy targets for Northern Ireland should be included here.

² A Strategic Framework for Northern Ireland, Department of Enterprise Trade and Investment (DETI), September 2010

With regards to Landscape Sensitivity Designations NIRIG are generally supportive of the following SPPS statement in paragraph 6.223;

“A cautious approach for renewable energy development proposals will apply within designated landscapes which are of significant value, such as Areas of Outstanding Natural Beauty, and the Giant’s Causeway and Causeway Coast World Heritage Site, and their wider settings.”

However, NIRIG would caution against the blanket exclusion of such areas and that consideration should be given to projects on a site specific basis subject to a sensitive design and the findings of a robust Environmental Impact Assessment and Landscape & Visual Impact Assessment.

Q32 Key Issue 27: Telecommunications

(Please refer to Section 7E of the Preferred Options Paper for full details)

Please choose **only one** of the following:

OPTION 27A - PREFERRED OPTION - Retain the existing policy-led approach in relation to telecommunications development.

Option 27B - Introduce Areas of Constraint in relation to telecommunications development.

Make a comment on your choice here:

Q33 Key Issue 28: Waste Management

(Please refer to Section 7E of the Preferred Options Paper for full details)

OPTION 28A - PREFERRED OPTION - Retain the existing policy-led approach in relation to waste management within the Council area.

Do you agree with the Preferred Option? Yes No

Make a comment here:

Q34 Key Issue 29: Protecting and Enhancing Built Heritage Assets and Archaeological Remains

(Please refer to Section 7F of the Preferred Options Paper for full details)

Please choose **only one** of the following:

- OPTION 29A - PREFERRED OPTION - Retain the existing policy-led approach with regards to the protection and enhancement of Built Heritage Assets but in addition provide opportunity to identify potential new Conservation Areas, Areas of Townscape Character or Areas of Village Character throughout the Council area.**

- Option 29B - Retain the existing policy-led approach with regards to the protection and enhancement of Built Heritage Assets.**

Make a comment on your choice here:

Q35 Key Issue 30: Protecting and Enhancing Natural Heritage Assets

(Please refer to Section 7F of the Preferred Options Paper for full details)

Please choose **only one** of the following:

- OPTION 30A - PREFERRED OPTION - Retain the existing policy-led approach with regards to the protection and enhancement of Natural Heritage Assets but in addition provide opportunity to identify potential new environmental designations across the Council area.**

- Option 30B - Retain the existing policy-led approach with regards to the protection and enhancement of Natural Heritage Assets.**

Make a comment on your choice here:

The Appendices

Q36 Appendix B: Equality Impact Assessment

Do you have any comment to make on Appendix B?

Yes No

Q37 Appendix C: Policy Review (PPSs)

Do you have any comment to make on Appendix C?

Yes

No

We welcome the reference to PPS18 within the POP document. However, we strongly request that Local Development Plan and policies **unambiguously align with national policies, frameworks and strategies** such as PPS18. The hierarchy of these should be explicitly stated and their application ensured by appropriate mechanisms.

Given the contribution of renewable energy to combating climate change, we would welcome the inclusion of the requirement for accommodating renewable energy targets within the local development plan to ensure Lisburn & Castlereagh City Council would be in a position to deal with mitigating and adapting to climate change. The principles and objectives outlined in the SEF1 reflecting the renewable energy targets for Northern Ireland should be included here.

Q38 Appendix F: Annual Housing Need Assessment Publication (NIHE)

Do you have any comment to make on Appendix F?

Yes

No

Q39 Do you have any comments on the remaining appendices?

Yes

No

Q40 Do you have any further comments about the Local Development Plan Preferred Options Paper?

Yes No

The emergence of the low carbon economy represents a sizeable economic opportunity in terms of attracting investment and creating employment. There is potential to develop new businesses and industry sectors linked to climate change. The development of new industries, for example, the clean-tech industry, is a growth opportunity and will enable Lisburn and Castlereagh City Council Area to promote and position itself to compete.

NIRIG would encourage Lisburn and Castlereagh City Council to take a more positive and forward-looking approach to renewables and this we believe can bring clear benefits to Lisburn & Castlereagh City Council area, not alone in combatting climate change but in fully positioning itself in terms of the economic benefits that renewable energy and the Green economy can bring. With increased powers now in place at Council level, an opportunity now exists to achieve successes in this area. We look forward to supporting the Council in these endeavours.

Thank you for completing this questionnaire. Please ensure that all comments are submitted before the deadline of 5pm on Thursday 25th May 2017

