

Lisburn & Castlereagh City Council

Local Development Plan

Preferred Options Paper

MAG Response

25 | 05 | 17

Lisburn & Castlereagh City Council

Local Development Plan Preferred Options Paper

Ministerial Advisory Group (MAG) Response

25 | 05 | 17

By email to:

ldp@lisburncastlereagh.gov.uk

1.00 General

- 1.01 MAG was established in 2007 to advise the then Minister for Culture, Arts and Leisure, and now the Minister for Communities, on the implementation of the Architecture and Built Environment Policy.
- 1.02 MAG welcomes the opportunity to comment on the Preferred Options Paper of the Lisburn & Castlereagh City Council Local Development Plan.
- 1.03 The MAG consists of an Interim Chair and 7 Members, all of whom are independent professionals appointed through the public appointments process to advise the Minister for Communities on the implementation of the Policy for Architecture and the Built Environment.
- 1.04 MAG is assisted by 21 Expert Advisors, independent professionals who, while they are not Ministerial appointees, are appointed through the public appointments process.

2.00 Preparation of MAG Response

- 2.01 This response has been prepared by three of the MAG's Expert Advisors and is submitted by MAG Secretariat on behalf of MAG.
- 2.02 The Ministerial Advisory Group sees enormous potential for the creation of this new Local Development Plan for Lisburn & Castlereagh City Council as a great opportunity to achieve a step change in the quality of our urban and rural environments over the next fifteen years.

3.00 Key to Text:

- 3.01 *POP extracts in italics*
- 3.02 MAG observations in normal text

MAG Response

Sections 1-4

4.00 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?

MAG Observation:

- 4.01 It has taken the last fifty odd years for the physical changes evident in Lisburn Castlereagh to occur. Many of the changes implemented here (and elsewhere) have roots in visionary thinking at play as far back as the 1920s – that's nearly one hundred years ago. Our thinking today can transform this place a hundred years from now. It may well take fifty or one hundred years to manifest but if we don't start and change our thinking it will never happen.
- 4.02 This LDP is the possibility of making a transformational difference. We are asking you to consider creating:
- an overarching vision statement, particularly for Lisburn City 2017-2035
 - the vision to be created in language (words and/or drawings), as if it already exists
- 4.03 It occurs that when the vision is articulated in this way, and consistently engages with and meets the needs of all relevant parties, and its possibilities are regularly communicated to them, then people of all walks of life will live into the possibility of that future. Unpredictable, yet positive, opportunities for action will occur. Over time the vision, created in language today, becomes reality to everyone's benefit.

5.00 Need for a Step Change

- 5.01 Wherever we go in the world, the physical environment reflects the cultural priorities of its people, past and present. While Belfast was at the coalface of a serious, protracted and divisive conflict, Lisburn has been growing because of changing population movements. Once a historic market town, one of its primary functions today is as a commuter 'town' for those working in its near neighbour. The effects of this are evident at a glance – particularly the city centre's disconnection from its surrounding suburban development.

5.02 Other forces have been at play over the past fifty years – nothing to do with the conflict - but divisive too, in other, sometimes more subtle ways. These include:

- Cultures of development
- Property portfolio boundaries
- Development procurement methods
- Rising private car ownership levels, and our traffic engineering responses
- Our love affair with the American models of development:
- Segregated detached and semi-detached suburbia
- The impact of out of town shopping at Sprucefield – itself arguably an effect of the conflict
- Mono-use business parks
- Mono-use industrial estates

5.03 These forces have been expressed in the following ways (not a definitive list)

- ‘Luxury’ suburban housing developments are created in fields with one road in and one road out. The residents of one development are divided from the next by an impenetrable fence along the former field boundary. One group of people doesn’t know their neighbours over the fence – regardless of cultural background
- Major road networks slices through Lisburn’s once connected, integrated, walkable market town centre which would undoubtedly once have enjoyed vibrancy and vitality – especially on market days - real community spirit
- Housing development (all very well intentioned) is creating new worlds that undermine our deep human need to connect meaningfully with each other

5.04 A glancing look across the city of Lisburn and the other settlements in this council area is evidence that the time is long past to effect real, meaningful change to meet the deep needs of all the people, regardless of class, culture, background, or ethnicity. The possibility exists today.

6.00 Sustainability Appraisal (SA)

- 6.01 We see a disconnect between the overarching commitment to sustainable development and a number of proposed Preferred Options. What were the terms of reference for the completed sustainability appraisal?
- 6.02 Is it a goal of Council to achieve meaningful socio-economic and environmental sustainability in this plan period? We ask that LCCC consider commissioning its own Sustainability Strategy to include a:
- Carbon Descent plan – whereby the council plans to be carbon neutral by 2030-2040
 - Renewable Energy Plan

Section 3 Policy Context

7.00 MAG Observation

- 7.01 Architects and planners create the future all the time with drawings and models, and live into that possibility. It occurs there is enormous opportunity for this Council's Planning Authority to be ambitious in depicting the future within its LDP.
- 7.02 As an example, one of the key 'drivers' in Northern Ireland is the private car. This is unsustainable. Now imagine we are in a world in which everyone in the Lisburn Castlereagh City Council area is no more than a short ten minute walk from their home or place of work to their local town/city centres and/or neighbourhood high street. Imagine that everyone has easy walking or biking access to the nearest bus or train halt, and along the length of the banks of the River Lagan in both directions.
- 7.03 We request that LCCC consider commissioning its own Integrated Movement Strategy to prioritise getting people out of their cars as much as possible, and create the vision for a new and better movement future.

8.00 Council Masterplans and Strategies

MAG Observation

- 8.01 Is it the intention of council when commissioning masterplans that these would provide the designed framework through which the future development of urban areas become attractive, distinctive and, integrated mixed use, walk-able neighbourhood meeting an entire community's needs for people of all ages, backgrounds and walks of life? This is something the MAG would readily support.
- 8.02 It occurs there is immense scope for Council to take such an approach in its masterplanning work, although we see no evidence of it within this Preferred Options Paper. The LDP would benefit from including within it pro-active, clearly defined masterplans for existing and proposed urban areas that create and/or re-make street networks (2/3/4 storey mixed use and residential terraces). We envisage these street networks as traditional in their footprint patterns, and 21st century in design quality of the buildings infilling the building lines. We are asking Council

to consider commissioning these for inclusion in the LDP. Thereafter, it would be possible to 'sell' part of such a masterplan to interested development teams.

Section 4 Spatial Context

9.00 Housing

MAG Observation

- 9.01 Population increase is estimated in the LDP as 13.1%. We understand the cultural population demographic for the Lisburn and Castlereagh City Council area is predominantly Protestant, and that Northern Ireland's Protestant population is declining. In this context, we question the basis for the projected population growth, and also for households to increase by 18%
- 9.02 The Plan's projected 18% increase in households translates into 9,500, yet the projected need for new dwellings is set at 13,000 over the plan period. This appears to indicate a substantial excess of new housing provision in this preferred options paper.
- 9.03 We are asking Council to consider - before the projected need for additional new build housing is set and/or an approval is granted for a single new house or apartment building - commissioning a Maximising Resiliency Strategy to maximise the re-use of housing which already exists and to bring people back into our town centres to live, work and play. We request that this include a vacancy mapping audit across the council region to:
- identify vacant residential properties, particularly residential heritage (and others) including former residential accommodation in terraced streets above shops
 - assess factors underlying their vacancy
 - establish ownership
 - scope condition and costs of maintenance/repair
 - assess how much of the region's housing need can be met by bringing these back into use for living
 - re-assess how many new homes are needed minus the numbers capable of being provided from existing stock

10.00 Economy

Given the key strategic location of the Council area regionally, there are significant opportunities to attract a wide range of major employment types, in particular on the two Major Employment Locations at West Lisburn/Blaris and Purdysburn/Knockbracken which

provide regional gateways on major transportation corridors; and the Maze lands which provide an abundant landmass for regionally significant developments. (Page 14)

MAG Observation

- 10.01 The nature of work has changed considerably from the days when it was deemed necessary to separate heavy industry from other urban uses and create separate industrial estates and latterly business parks. Retaining the myriad of employment typologies as part of a mixed-use urban core helps provide the footfall and disposable income needed to support vitality and vibrancy in streets, and also sustain other businesses, particularly the hospitality sector.
- 10.02 We do not support the creation of major employment land-banks, industrial estates and / or single-use business parks – whether edge of town, out of town, or in town. We consider that facilities accommodating working people can easily be integrated into existing and new 21st century street networks.
- 10.03 The rural area also provides important opportunities for employment through agriculture, forestry, tourism and other rural related enterprises. The relationship between the rural area and the settlement hierarchy is interdependent, and sustaining rural communities will be an important focus of the LDP. The aim will be to ensure a balance between protecting the countryside and minimising new development.
- 10.04 We question the rationale that suggests new 'sustainable' development is necessary to sustain rural communities. Minimising new development in the countryside is sustainable, whereas allowing further opportunities for 'sustainable' development in the countryside is not. Our rural lands are a finite resource and each new building is a diminution of this resource. It is untenable to persist with such a course of action as eventually nothing will be left. When the working lives of rural communities are fully embedded in agriculture and associated activities, such communities have sustained themselves very well over the decades with minimal rural built development. Historically, county and market towns served the needs of rural communities – regular farmers' markets drew country folk into town where they bought and sold, and also did the weekly shop. New sustainable development is best located in city and town centres, and villages.

Section 5: Growth Strategy and Spatial Framework

11.00 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 ✓

MAG observation:

11.01 A range of issues inhibit the ability of Lisburn to fully function as an urban centre.

11.02 Name and address the major elephants in the room ie:

1. Lisburn City Centre is disconnected from its suburban hinterland
2. Its centre is fractured and disjointed
3. There are infrastructure severance issues and constraints
4. The fact that Belfast is cheek by jowl with Lisburn City contains its growth to the north, and fosters Lisburn's primary function as a dormitory city
5. The implications of climate change for future development

11.03 Wherever you go in the world the physical environment reflects the predominant cultural norms, collective world-view and social organisation of its people, past and present. Lisburn City, the one time historic market town, is a reflection of a place that has been physically brutalised by large-scale roads infrastructure to the extent its town centre is completely disconnected from its suburbs.

11.04 In October 1943, Churchill said 'We shape our buildings and afterwards they shape us.' It seems fair to say the same is true of places. If this is indeed true then this disconnected places shape our own social disconnection from each other. Research reveals the cost of social isolation to our physical and mental health equates to obesity and smoking 15 cigarettes a day. Social isolation kills. This LDP is the possibility of changing the disconnected physical environment contributing to it - for the benefit of everyone's well being.

11.05 The MAG supports an amended future growth Strategy that aims to:

- Support the regeneration of our city, towns and villages within their existing urban footprints whilst sustaining the countryside's life and work and protecting areas that are environmentally sensitive.

- Provide a settlement hierarchy and urban design led frameworks and masterplans supporting the retention of existing historic street networks, and creating new footprints for terraced streets indicating massing for high density mixed use urban cores that comprise streets for living, working, playing and learning – and which support distinctive, connected, vibrant and vital city and town centre cores.

11.06 The MAG does not support:

- Designation of development limits and zone land for housing growth in accordance with the sequential approach of the RDS and facilitate growth in settlements where appropriate reflective of their size, scale and context.
- Designating employment land to make provision for an adequate and continuous supply taking account of accessibility to major transport routes

11.07 We do not support the creation of major employment land-banks, industrial estates and/or single use business parks – whether edge of town, out of town, or in town and consider that in the vast majority of cases the nature of 21st century facilities accommodating people who are working can easily be integrated into existing and new street networks.

11.08 We request the following:

- Identifying, defining, and designating retailing, recreation, residential, education or community facilities within mixed use urban design led frameworks, and masterplans that create street typologies in urban core and neighbourhood high street areas.
- Identifying, auditing, designating, and protecting collective built and natural heritage assets – listed and unlisted
- Outside settlements accommodating single dwellings in the countryside in accordance with prevailing regional planning policy and supplementary design guidance
- Establish key design parameters and site appraisal conditions to help support achieving high good quality design in development
- Define regional movement policy, promoting reduction in the need to travel by car and use of alternative modes of transport –
- Integrated, connected transportation infrastructure, including interconnected terraced street networks designed to prioritise pedestrian and cyclists will underpin the delivery of the spatial

framework to ensure that the Council's LDP vision for the area can be achieved.

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

Yes

No ✓

MAG Observation

12.01 We request the following revised, reduced/amended themes

12.02 **Enhancing Quality of Life** - Supporting an improved quality of life through creating urban design led street network frameworks accommodating high density (2/3/4 storey mixed use terracing) housing, employment, leisure, community, cultural, education, health facilities and attractive usable open and green space, and ensuring excellent pedestrian and cycling accessibility to such provision for all citizens.

12.03 **Strengthening Communities** - Strengthening the development of distinctive, connected communities living and working in mixed tenure, socially mixed, mixed-use, walk-able neighbourhoods. City and town centre streets, squares, parks, lanes, river-walks etc etc are public shared spaces accessible to all the community. Healthier lifestyles will be encouraged through enhancing pedestrian and cycling access to and through streets, parks, River Lagan shorelines and other blue and green infrastructure.

12.04 **Supporting Economic Development** – The plan will have a key role in supporting new development that meet the needs of all aspects of human living including revenue generating activities, whilst simultaneously protecting our finite heritage, built and natural uses, including promoting city and town centres for living, shopping, commerce, learning, community life, praying, playing, and visiting.

12.05 **Sustaining a living and working countryside** – the Plan area consists of a large rural area providing produce, environmental and leisure benefits. Development necessary to business typologies inextricably linked to the rural context – eg farms will be supported, where this is not detrimental to the amenity, agricultural and natural heritage value of the rural land and its setting. Large business developments related to the rural context such as agri-food developments, eco-villages etc are favoured

in towns, preferably in existing buildings or on brownfield lands within existing urban development contexts. Rural businesses of an appropriate size and scale will be supported in towns and in accordance with existing regional planning policy.

- 12.06 **Supporting Good Design and Quality Places** – Well connected, well designed urban places with intact street networks of mixed use terraces whose buildings are predominantly attached to each other (large and small) can transform community life and create attractive places to live, work, play, and invest.
- 12.07 **Climate change** - Climate change resilience should be an integral part of all proposals both for built and natural landscapes.
- 12.08 The possibility exists for this LDP to create the context for healing, re-making and creating new interconnected and intra connected, mixed-use places made of streets with pedestrian/cycling priority connectivity to adjoining parks, riverbanks, squares etc etc. These are attractive places to live and work for people of all backgrounds and support the growth of great community networks and spirit. The time is long past whereby LDP's can discharge their duty by simply allocating parcels of land to one use or another - 2D land use planning. It occurs this is a mid 20th century approach to planning that has created so much of our fragmented, socially alienating, dead urban places and spaces. We are requesting that you stop this.
- 12.09 We are a society, not an economy. We are requesting that this LDP become the possibility of protecting existing (and managing the creation of new) places that meet the needs of all aspects of human living more or less within 10 minutes walk of people's homes - whilst simultaneously protecting our finite heritage, built and natural. It occurs as irresponsible to write into a plan that a generous and continuous supply of land will be made available for a range of employment uses – this opens the door to anything and makes development control impossible. Town centres were traditionally places to live as well as engage in all the other functions often existing today. This is still possible – until people of all ages and backgrounds are back living in town and city centres the longed for street vibrancy and vitality will remain a pipe dream.

Section 6: Vision and Strategic Objectives

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

Yes

No ✓

MAG Observation

13.01 It has taken the last fifty odd years for the physical changes evident in Lisburn and Castlereagh City Council area to occur. Many of the changes implemented here (and elsewhere) have roots in visionary thinking at play as far back as the 1920s – that's nearly one hundred years ago. Equally our thinking today can transform this place, for the good, a hundred years from now. It may well take fifty or one hundred years to manifest but if we don't start and change our thinking today it will never happen.

13.02 This LDP is the possibility of making a transformational difference. To achieve this it needs:

- an overarching long term vision statement for the Council area, and specifically for Lisburn City 2017-2035
- the vision to be created in language (words and/or drawings) as if it already exists

13.03 Such a methodology creates a new and better future, right now - today.

13.04 If the creation of this vision consistently engages with and meets the needs of all relevant parties, and its possibilities are regularly communicated to them, then people of all walks of life will 'buy into' and live into the possibility of that future. Unpredictable opportunities for action occur. All sorts of people act from their unique skill sets. Over time the future created in language becomes reality.

14.00 Need for a Step Change

14.01 Wherever we go in the world the physical environment reflects the cultural priorities of its people, past and present – all the cultural priorities. While Belfast was at the coalface of a serious, protracted and divisive conflict, Lisburn and Castlereagh City areas were growing due to changing population movements.

14.02 It must be said much of the city's physical division has everything to do with 20th and 21st century development cultures such as:

- Creation of segregated suburban housing in former fields, with one road in and out – these are severed from adjoining suburban housing development by impenetrable fence following the field boundary.
- Standalone single use developments including:
- edge of town/out of town shopping centres surrounded by seas of surface car parks,
- single use business parks
- single use industrial estates
- new schools set in their own grounds surrounded by palisade fences etc etc.

14.03 Once a historic market town today one of Lisburn City's primary functions is as a commuter 'town' for those working in its near neighbour, Belfast. The effects of this are evident at a glance – swathes of suburbia in Greater Lisburn and the city centre's disconnection from its surrounding suburban development, because of major roads infrastructure.

14.04 Other forces have been at play over the past fifty years – little to do with the Northern Ireland conflict per se - but divisive too, sometimes more subtle ways. These include:

- Cultures of development
- Property portfolio boundaries
- Development procurement methods
- Persistently rising private car ownership levels, and our traffic engineering responses
- Our individualistic, neo-liberal society
- Our love affair with the American models of development:
- Segregated detached and semi-detached suburbia
- The impact of major out of town shopping at Sprucefield (its location and development arguably an effect of the conflict in the days when shopping in Belfast was still unattractive)
- Mono-use business parks or industrial estates
- Mono-use edge of town entertainment/shopping/restaurant zones

14.05 Lisburn is a young and small city suffering from the physical disconnection and division that comes with 20th and 21st century development typologies and large scale traffic engineering. Great

possibility exists to heal, reveal and co-create authentic beauty in places, people; and the relationships between them. These possibilities include healing physical division, and re-making distinctive, connected neighbourhoods, in ways that reconnect people to people, and generate delight and wellbeing for all those living and working in the area.

14.06 Possibilities exist to:

- reconnect the city centre to its suburban areas
- undo pedestrian/cycling disconnection generally
- remove the car from the city centre by 2030
- improve public transportation networks and extend service provision
- encourage greater use of the River Lagan and its banks including for living (house boats) and hospitality - floating cafes/restaurants etc.

14.07 This would be achieved by creating a new context within which these possibilities can occur. Actions flowing from such a context include a commitment by LCCC planning authority to pro-actively support:

- the repair, retention and re-connection of existing urban contexts already offering physical conditions for meaningful connection with our fellow citizens eg. collective built heritage (listed and unlisted)
- excellent urban design
- landscape architecture
- innovative, creative, well judged architectural interventions.
- Prioritising pedestrian and cycling over private vehicular modalities
- Facilitating shared movement schemes wherever possible
- Connecting of smaller routes - this would benefit movement as a whole

14.08 All of the above represent exemplary conservative repair and contemporary 21st century design, making a positive difference to the wellbeing of all the people in Lisburn City.

14.09 Stitching the city centre back to its suburban hinterland sees new interventions and developments that increase permeability in the city, and prioritise pedestrian movement, whilst also achieving integrated tangential and radial vehicular movement. There is enormous scope to create a significant new green route along the length of the banks of the River Lagan upriver and downriver and link walkers and cyclists to Belfast - building on the success of the Lagan towpath and

Connswater Greenway. In certain situations shared movement will be supported - excellent examples include: Exhibition Road, and Seven Dials in London, and Bohmte, Germany. New development could be encouraged along routes re-connecting the city centre to inner-city neighbourhoods.

- 14.10 There are opportunities through planning and regeneration processes to increase equality of opportunity and contribute to a knitting together of the physical aspects, and healing the social isolation that results from physical division.
- 14.11 The Local Development Plan Vision statement is very bland and needs to go much further if it is to make a difference. A separate vision is needed for the council region, as a whole, and individual visions for specific places within the region. These need to be place specific, truly aspirational, and creates a context for transformational, beneficial change for all.
- 14.12 Well worded, a vision statement with strong ideas that create a future of distinctiveness, connection, quality and excellence can be inspiring in itself. We see what we describe. So when an inspiring vision is consistently presented and well communicated to all relevant parties, and is found to meet their needs, magic happens. People, of all kinds, live into the possibility created. We request that this vision statement be written in the present tense – this is a more powerful use of language – because it creates new contexts and possibilities right here and now. Key actions align behind the possibilities as stakeholders live into that.

15.00 Vision for Lisburn City

15.01 MAG offers the following vision possibility for Lisburn City:

15.02 Lisburn City is a socially, economically, and environmentally resilient, 21st century regional city, attractive to people of all ages, as a great place to live, work and visit. Distinctively different from yet complementary to Belfast, its strong personality as a market city makes it a destination for sustainable shopping by locals, and citizens from Belfast and adjoining council areas too. Excellent public transport links by rail and bus mean it's so easy to get here. Walkers and cyclists, old and young, love the leafy Lagan lanes, whose scenic river bank character and ambience was protected, along the length of the

Lagan basin, in the visionary Lisburn + Castlereagh Local Development Plan 2017-2035, and those of other councils through which the Lagan flows.

Lisburn City is successful, dynamic, and smart. Distinctive, connected, socially and culturally mixed its neighbourhoods are home to people of all creeds, class, and colour. Neighbours know each other well enough to call in for a cuppa now and again or, perhaps, send out a Mayday call in an unexpected personal crisis. Community spirit is soaring everywhere, particularly in the vibrant city centre's historic streets where families, the elderly, and singles are queuing up to live. 20th century and early 21st century roads infrastructure severing the city centre from its hinterland have been erased and the city centre is completely stitched into the surrounding neighbourhoods via walk-able terraced streets of 21st century state of the art, Passive Haus homes. The Council's decision to prioritise housing within a mile of the city centre has transformed the city centre. There is lots of 'Living Over the Shop' in the city centre and also in the numerous mixed-use neighbourhood high streets. Homezones - ala Amsterdam - within street networks are popular places to play, for children of all ages. With all the comings and goings city centre and neighbourhood streets are vibrant all day and well into the evenings - so everywhere feels really safe.

Winner of the *Resilient City Award 2030*, Lisburn is delighted with its achievements in being the first Northern Irish city to remove cars from the city centre – a feat it pulled off in 2025 - and building a strong, sustainable local economy based on locally owned independent retail, restaurants, and artisan food production. Restaurants and cafes proudly display menus' food progeny. And just about everything comes from within the Council region, or not far beyond. Wild brown trout from the Shaw's Bridge fisheries is supplemented daily by fresh seafood from Kilkeel – a short run by bus and train. And new 'foodie' business collaborations have sprung up all over the island – to everyone's benefit.

Neighbourhood high streets are full of locally owned and run independents, and all sorts of entrepreneurial enterprises (social and profit making) tucked away in nooks and crannies, offering just about everything the average household needs day-to-day. And at affordable prices too. The city centre is also the place to go for those

one-off purchases requiring that wee bit of 'touchy feely' checking out - like your new sofa or oven.

Our Neighbourhood Allotments and Community Gardens Initiative is hugely popular, providing locally grown fresh produce for low-income (and high-income) people during spring and summer. More importantly, this initiative has been an invaluable cross-cultural, cross-class community building and skills development vehicle. Used by everyone, old class divisions and predominantly mono cultural demographics are no more.

All these sustainable businesses and enterprises harness the creativity, talent, and expertise of locals and incomers alike, from across Northern Ireland, the Republic of Ireland, and well beyond. Unsurprisingly the city's tourist economy is going from strength to strength thanks to our care of our built heritage assets. Building on the success of the Bridge Street Townscape Heritage Initiative our care and conservative repair of Market Square (the city's thriving daily fruit and vegetable market moved back there in 2020), Railway Street, Castle Street, Bow Street, Bachelor's Walk really consolidates our distinctiveness and local identity within the council region and across Northern Ireland.

Gateway to the south and south west of Northern Ireland and border counties in the Republic of Ireland our effective inter-regional working with Northern Ireland's other major tourist destinations including: the Giant's Causeway UNESCO World Heritage Site, Mourne, Derry's walled city, the Fermanagh Lakeland, Causeway Coast and Glens and Sperrins AONBs, and Tourism Ireland, has really put Lisburn on the map for day trippers, and weekend breaks too. The two-way flow benefits from excellent 21st century sustainable transport connections. Particularly significant is the high-speed half hourly Cork - Derry~Londonderry rail link via Lisburn, Belfast and Dublin – opened in 2018 – and its direct link to Belfast International and Belfast City airports. Now the millions visiting the *Wild Atlantic Way*, Derry's walled city and Belfast's wonderful attractions include Lisburn on their route – and vice versa.

We love our beautiful countryside – like the rolling hills of Moneyreagh and the gift that is our lovely Lagan. Mecca for children, young and old it's a tranquil lung of blue and green, the most special of our extensive network of superb parks - like Castle Gardens, Wallace Park - and numerous brilliantly designed play spaces.

Linear greenways created along arterial routes - a transformation of all those old, inhuman, dual carriageways - have been a rip roaring success. The old roads have been de-engineered, some as streets, others as greenways. All put people, rather than cars first. 'Green transport' like biking and walking are our ways to go. Made possible by the consolidation of *Rapid Transit* and other sustainable forms of public transport, plus the introduction of car toll charges, travelling to work has become a pleasure; and the city centre is buzzing with walkers and cyclists.

Our pièce de resistance is the world class, award winning newly landscaped *Peace Park* at the former Maze lands – the result of an international design competition attracting stunning entries from teams of the world's leading artists, sculptors, landscape architects, architects, and urban designers. Extending over the M1 its amazingly creative landscaping, architecture and other infrastructure means its now possible to walk or cycle all the way there and back from Lisburn City centre, through the new street neighbourhoods at former city centre car parks, like Jordan's Mill, and the recently completed Blaris urban extension, a mixed use neighbourhood of 21st century terraced streets, brilliant for living, working, and playing - winner of an Academy of Urbanism Great Places 2027 award.

There's been a step change in our 2017 attitudes to all those boarded up, empty shops and old buildings – remember them? Well, we really love and value these enormously - especially our unique collections of modest historic terraces. Sensitively repaired and retrofitted by master craftsmen and women, under the guidance of highly skilled conservation professionals, these are the bedrock of our 2035 distinctive, connected communities and neighbourhoods. Their authenticity helps tell the city's story of times gone by. A welcome by-product has been a robust revival of the traditional buildings skills and craftsmanship that built the historic market town of Lisburn - now maintaining it for the next generations. People, young and old, love where they live. Everyone loves Lisburn.

This transformational change was made possible by the collective inspired leadership demonstrated by Lisburn and Castlereagh City Council's Planning Authority's transformational vision, guidance and support for the repair, re-use and re-creation of our new and better place. Throughout it all, our citizens were positively engaged in a series of inclusive, collaborative strengths based, possibilities oriented inquiry

and co-creative visioning conversations. Building on our strengths past and present - like our built and natural heritage assets and people - we collaboratively co-created a new and better future in language, meeting the needs of everyone. Quite unpredictable, almost magical actions followed. Over time the future we created back in 2017 has become today's reality.

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

Yes

No ✓

16.01 Revision requested:

The LDP for Lisburn & Castlereagh City Council provides a 15 year framework for the future growth to support communities through creating distinctive, connected mixed use neighbourhoods made of terraced residential and mixed use high streets within existing urban areas, prioritising the re-use of existing buildings (particularly listed and unlisted heritage), re-development of surface car parks and brownfield land, facilitating a strong, sustainable and diverse economy, protecting environmental resources, removing the car from town and city centres, identifying pedestrian and cycling infrastructure requirements and integrating services to support the community.

MAG Observation

16.02 Strategic Objective A: Enabling Sustainable Communities, prioritising re-use of existing vacant buildings for living and other uses, and Creating new mixed use, walkable interconnected neighbourhoods of terraced streets for living, working and playing, where necessary

- To develop strategic policy that will build sustainable communities with good pedestrian and cycling and public transport access to places with mixtures of the following: homes, work, public transport, learning, community, and recreational facilities
- To prioritise Lisburn City as the primary settlement, and consolidate the natural growth of its communities and neighbourhoods within its existing urban footprint
- To support the Council's towns, and village's development as vibrant and attractive places with mixed use residential, independent retail and commercial high streets serving the needs of their citizens

- To support the provision of terraced housing to cater for a range of types and tenures and support need for social housing as identified
- To support sustainable protection of the countryside by minimising opportunities for new rural housing, except where this meets the Regional Planning Policy PPS21 and its supporting design guidance.

16.03 We fully understand and appreciate the pressures councils will be under from any political lobby supporting relaxation of planning restraints on rural development – but a line does need to be drawn and the preparation of new LDPs is the time to draw it.

16.04 Sustainable development means planning policies that encourage people to live in towns and perhaps villages (though less so), and discourages people from living in the countryside unless they need to for their work: perhaps farming or associated with agriculture; or caring for an elderly parent/ sick child; or some other very specific reason why they absolutely **need** to be there etc. It means discouraging anyone who truly doesn't **need** to live in the countryside from living there. Choosing to live in the countryside as a lifestyle choice is not sustainable. Our rural landscapes can't afford the intrusion. Our planet can't afford the car journeys it generates.

16.05 In the interests of our children and grandchildren we request that LCCC demonstrate their commitment to climate change.

16.06 We request that photography for next versions of the LDP be selected to present exemplary urban mixed use living and live/work units within street networks – the photographs selected on page 22 are the antithesis of what is needed to support connected, thriving mixed use places for living or working.

16.07 Strategic Objective B: Driving Sustainable Economic Growth

- To support a thriving and diverse economy by directing development proposals accommodating a range of work typologies into existing vacant buildings, surface car parks and brownfield lands within existing city, towns and villages (particularly their cores and neighbourhood high streets) where these grow contexts of interconnected, mixed use, living and working, urban terraced streets
- To support Lisburn City, towns and villages as mixed use centres of living, working, learning, playing, praying, and cultural life for their surrounding hinterland.

16.08 Strategic Objective C: Growing our City, Town Centre, Retailing and Offices

- To develop strategic policy to protect and promote the city and town centres as places to live, work, shop, entertain and be entertained, pray, play, and visit.
- To promote Lisburn City Centre as a vibrant destination offering a mix of living of various tenures, shopping, employment, high grade office development, leisure, education, and the full range of community uses.
- To promote the development of the night-time economy to ensure living, vibrant and thriving city and town centres to maximise socio-cultural and economic growth and create further opportunity for enhancing their vitality and viability.
- To promote the regeneration and reuse of existing buildings and previously developed land for mixed use urban street networks development, whilst maintaining environmental quality and residential amenity.
- To recognise the role of Sprucefield as a regional retailing destination at a key strategic location within Northern Ireland, and control its capacity and functions to ensure this facility does not undermine the retailing, hospitality, entertainment offer and possibilities in Lisburn City centre and other towns.

16.09 Strategic Objective D: Promoting Sustainable Tourism, Open Space and Recreation

- To support tourism development whilst protecting tourism assets, especially authentic built and natural heritage, and encouraging the siting of appropriate development including a range of tourist accommodation in city, town and village centres - or where this is not possible on the edge of city, town or villages within their existing development footprint.
- To support the recreation and leisure offer within the Council to grow in sustainable manner, whilst simultaneously protecting the finite resource that is natural heritage and agricultural land.
- To support accessibility and pedestrian/cycling connections to open and green space, particularly the River Lagan and its banks – this council's most special natural asset, and including the Lagan Valley Regional Park and waterways.

16.10 The River Lagan's existence through this area is a gift to Lisburn and the wider region. It is a major natural asset and amenity resource.

Connections to the River are very poor and built development too close to its banks is already spoiling this fabulous amenity asset and public access to it. The possibility exists to be in Belfast by bike in 20 mins via this route. It occurs there is an excellent opportunity to develop one strand of a wider recreation and leisure strategy that simultaneously prises people out of their cars and builds recreational/tourist offer – the experience in Derry~Londonderry since the riverside greenways along the River Foyle were created has been that people are running, walking and cycling along its banks in numbers undreamt of in the 1980s –all good for wellbeing and social connectivity.

16.11 MAG requests that LCCC partner with other relevant councils to prepare a *Realise the Amenity Asset of the River Lagan and its Banks* strategy in the interests of protecting and opening up the natural land resource along this river from source to sea – and reducing car usage for travelling to work in Belfast. Include within this strategy the possibility of permitting houseboats on the River Lagan and the provision of utilities necessary to support this.

16.12 Strategic Objective E: Supporting Sustainable Transport and Other Infrastructure

- To develop strategic policy to support the consolidation of Lisburn City Centre within its existing land area and exploit its highly strategic location on the Key Transport Corridors and rail network.
- To remedially design infrastructure that disconnects city and town centres from their hinterlands – particularly roads of different types and other large developments. Protect the designation of key pieces of strategic infrastructure eg heritage and promote pedestrian and cycling linkages across the Council area.
- To promote active and increased opportunities for sustainable travel including walking, cycling and public transport, particularly to and along the River Lagan, and reduce the need to travel by private car.
- To promote the opening up and creation of greenways, blueways, enhanced pedestrian/cycling connections and access to these areas to support walking, cycling and biodiversity.
- To recognise and maximise the value of blue infrastructure to contribute to citizen's wellbeing, sustainable urban drainage infrastructure, and its contribution to human health.

- To significantly contribute to meeting our national climate change commitments by substantially reducing our greenhouse gas emissions to align with national government commitments by 2030, removing cars from Lisburn City centre by 2030, mitigating against and preparing for the climate change reality and building in flood resilience.
- To support renewables infrastructure, particularly where this supports local business eg PV/solar panels whilst affording protection to the environment including landscape impacts of wind energy.

16.13 Strategic Objective F: Protecting and Enhancing the Built and Natural Environment

- To develop strategic policy that supports the protection of our built and natural environment recognising its contribution to our collective health and wellbeing, and socio-economic growth.
- To conserve and enhance (where necessary) our Conservation Areas and Areas of Townscape/Village Character as important assets, and protect their setting.
- To protect listed buildings and other built heritage assets and promote their sensitive re-use and adaptation to help retain and reinforce a sense of place and distinctiveness.
- To require the highest quality urban design, and landscape architecture for existing city, town and village centres, as well as in masterplans and urban design frameworks for new developments/neighbourhoods; and high quality contemporary architecture for new buildings; sensitive conservative repair of old buildings; to enhance places and create distinctive connected communities of delight for everyone.
- To protect and enhance the natural heritage assets including the River Lagan's banks along its length not only the Lagan Valley Regional Park, AONBs and other high quality landscapes and secure through appropriate designations to ensure they remain unspoilt for future generations.

Section 7: Key Issues and Options

17.00 Q6 Key Issue 1: The Settlement Hierarchy

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***

MAG Observation

17.01 We request that Lisburn City be prioritised in the settlement hierarchy because it has city status and is in need of considerable attention to maximise its latent potential, particularly reconnecting the city centre to its hinterland.

17.02 We do not support the creation of a 'small settlement's' category in the hierarchy because this has potential to attract 'hard to refuse' development proposals as a consolidation of these small settlements of an urban or suburban character in what is virtual countryside. The potential threat to the character and integrity of the countryside is at stake.

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

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

MAG Observation

18.01 We do not support Preferred Option 2A, and are requesting Option 2B because of Lisburn's city status and great capacity for absorbing new housing through:

- Reducing existing vacancy,
- Development of surface car parks

- Infilling gap sites to link/connect the city centre and its hinterland
- 18.02 The potential for Blaris lands to accommodate increased housing need, in time and where necessary, in the form of an urban extension to Lisburn City Centre - this to be street character neighbourhoods of mixed-use interconnected residential terraces off a main high street. Our caveat on this option is that Blaris should not be accorded a Simplified Planning Zone status – this is unlikely to achieve the interconnected street neighbourhood context outlined above and can result in isolated buildings of poor design quality that do not contribute to their place, or creating the conditions for real community.
- 18.03 We question the projected number of households needed in the Council region. The population increase is estimated in the LDP at 13.1% yet isn't it the case that Northern Ireland's Protestant population is declining? And we understand the cultural population demographic for the Lisburn and Castlereagh City Council area is predominantly Protestant. In this context what is the basis for the projected population growth of 13.1%, and also for households to increase by 18%?
- 18.04 The Plan's projected 18% increase in households translates into 9,500 yet the projected need for new dwellings is set at 13,000 over the plan period. It occurs there is a substantial excess of new housing provision compared to household need in this preferred options paper.
- 18.05 We request that before the projected need for additional new build housing is set and/or an approval is granted for a single new house or apartment building that a *Maximising Resiliency Strategy* be commissioned to make the most of what already exists. We request that this include a vacancy mapping audit across the council region to:
- identify vacant residential properties - particularly residential heritage (and others), including former residential accommodation in terraced streets above the shop
 - assess factors underlying their vacancy
 - determine ownership
 - scope condition and costs of maintenance/repair
 - assess how much of the region's housing need can be met by bringing these back into use for living
 - re-assess how many new homes are needed minus the numbers capable of being provided from existing building stock

18.06 We consider that facilitating future housing growth alone is insufficient to support socially, economically and environmentally sustainable communities – to achieve this fully integrated walk-able urban street networks of residential terraces and mixed use commercial high streets. Lisburn has already begun to set a good example in this regard by the success of its redevelopment of Bridge Street through the Townscape Heritage Initiative and the creation of new flats over shops to bring people and life into the City Centre.

18.07 Reference option 2C it occurs for us that the extent of land already zoned in the LCCC area is extensive, and likely to mean low land values. High land values often translate into high quality development and low land values the opposite. We support the re-zoning of lands previously zoned for housing back to agricultural land and/or to public amenity uses.

19.00 Q8 Key Issue 3: Facilitating Sustainable Housing in the Countryside

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”

MAG Observation

19.01 Sustainable housing in the countryside requires planning policies that encourage people to live in towns and perhaps villages (though less so there), and discourages people from living in the countryside unless they need to for their work: perhaps farming or associated with agriculture; or caring for an elderly parent/ sick child; or some other very specific reason that means they absolutely **need** to be there etc. It means discouraging anyone who truly doesn't **need** to live in the countryside from living there. Choosing to live in the countryside as a lifestyle choice is not sustainable. Our rural landscapes can't afford the intrusion. Our planet can't afford the car journeys it generates.

- 19.02 We support sustainable protection of the countryside by minimising opportunities for new rural housing, except where this meets the Regional Planning Policy PPS21 and its supporting design guidance.
- 19.03 We question and are concerned at the proposed additional 10% of new Housing Growth Allocation in the countryside outside settlements. Our preference is for new housing to be conditional on meeting PPS21 and its associated design guidance rather than setting a target.
- 19.04 In the interests of our children and grandchildren we request that LCCC strongly support the government's commitment to addressing climate change.

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

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 ✓

MAG Observation

- 20.01 Things change – we consider that tying land down for fifteen years plus while waiting for things to happen is reactive when the possibility exists to be pro-active about creating the frameworks supporting the sort of place-making that is desirable for people to live, work and play in.
- 20.02 One drawback is this can cause blight and a lack of care for the land/property in the meantime. In the case of brownfield land this could preclude the possibility of such land becoming a mixed-use place-making framework including residential streets. In the case of agricultural land it could mean less careful husbandry.
- 20.03 We do not support the protection of land for uses that exclude essential ingredients supporting great communities: socially mixed residential tenures,
- 20.04 We request that LCCC commission a strategic masterplan for such land areas to create the framework for mixed-use walkable street character neighbourhoods and town/city centres. This could be sold in sections

to developers, and/or consortiums seeking to develop a particular area – this would be a pro-active approach by the LCCC planning department which would tie in with the council's stated desire to 'maintain compact town and village forms'.

21.00 Q10 Key Issue 5: Safeguarding Existing Employment Land

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

MAG Observation

- 21.01 The nature of 'employment' or work has changed substantially since the 1970s and 80s when dirty, large scale, heavy industry was an integral part of the equation. So many jobs are now service sector and frequently desk or computer based that the need for segregated industrial estates or business parks is no longer relevant.
- 21.02 Entrepreneurial activity thrives on the ability to connect with as many people as possible in spontaneous adhoc ways – including in cafes as much as in the office. Locating job providing facilities in isolated, disconnected, and segregated single land use developments misses this opportunity.
- 21.03 In the interests of supporting vibrant and vital places to live, work and play and fostering entrepreneurial cultures within our city, town, and villages we prefer Option 5B

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

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

MAG Observation

22.01 We support the re-designation of Blaris lands as a mixed-use site with the caveat that this is not granted a Simplified Planning Zone – high quality town planning and urban design is required here to ensure this does not become a series of big or small ‘boxes’ laid out around surface car parks and roads (rather than streets).

22.02 It is important that release of these lands for our preferred mixed use walkable neighbourhood urban extension is not permitted until after Lisburn City’s (both the centre and suburban neighbourhoods) capacity to accommodate such equivalent mixed use walk-able street development is completely exhausted

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

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 ✓

MAG Observation

23.01 We do not support the retention of Purdysburn as a major employment location on the basis that:

- A high quality ICT/Medial business park is a car dependent single use development, and unsustainable environmentally.
- This is an area surrounded by substantial low density residential development in need of high quality public amenity lands – for

which demesne landscapes are perfect. We request the re-designation of this demesne landscape as public amenity lands.

- Entrepreneurial activity, whether in ICT or the medical world, thrives on the ability to connect with as many people as possible in spontaneous adhoc ways – including in cafes as much as in the office. Locating job providing facilities in integrated urban environments supports this whereas locating them in isolated, disconnected and segregated single land use developments misses this opportunity.

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

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

MAG Observation

24.01 We consider that the designation of the Maze lands as strategic and of regional importance is a legacy of the conflict. Had there not been a conflict these would be regular Northern Irish fields.

24.02 Given the location of the Maze lands west of the M1, Blaris lands, and Lisburn City we are concerned at the possibility of major built development at the Maze lands drawing people and development energy away from Lisburn City which, as we have said, needs to be prioritised.

24.03 We request that the sensitivities of these lands post conflict be recognised in a way that does not undermine Lisburn's potential as a city and that they be designated for the creation of an *Peace Park* - designed to world class landscaping and sculpture standards, ideally created through an international Landscape Institute/RIBA run design competition to which teams of world ranking architects, landscape architects, urban designers are invited to compete.

24.04 We consider that this is a healing post conflict legacy, that everyone can enjoy, offering much needed peace and tranquility for the well being of all.

- 24.05 We recommend appraisal of the capacity of new street networks in place of major unnecessary inner city roads infrastructure to accommodate side on street parking- and the provision this would offer before allocating any land to large surface car parks or multi-storeys either.
- 24.06 We request the remedial design of major 'roads' infrastructure to street character with the importance of the pedestrian put first. We are all pedestrians when we leave our cars. As acknowledged in the Preferred Options Paper, there is a need to better connect pedestrians with the city and enhance pedestrian connectivity conditions for those walking in, through, and out of the city centre area. This particularly applies to the roads that encircle the centre such as Governors Road, Queens Road and Laganbank Road.
- 24.07 We support the consolidation of rail and public bus transit systems including the West Lisburn train halt, and request the creation of a rail link from Antrim to Belfast International and another to Belfast City Airport to increase Lisburn City's connectivity in both directions – thus opening up the LCCC area and particularly the Lagan Valley, and heritage tourist assets to a wider island wide and international tourist market.
- 24.08 Construction of the Knockmore link road will enable the growth of west Lisburn, consolidate the city centre and enhance access to the Maze *Peace Park* and to Lisburn city for the large numbers of new dwellings recently constructed to the north of Lisburn. The Knockmore link road should be designed as a street, rather than another busy through road unfriendly to pedestrians - eg having the character of something like the eastern section of Lisburn Road or lower Newtownards Road with side streets off of. It is imperative that high design quality integrated cycle and walking routes are prioritised as part of any new 'street character' road development. The construction of such a new 'Knockmore Street' arterial route should be scheduled to follow after the consolidation of Lisburn City Centre is complete, and when it would, later, allow the City to grow westwards once the historic core of Lisburn is regenerated.
- 24.09 We further request the creation of a direct rail access to the Blaris lands for future development when Lisburn city centre's capacity is exhausted, and a pedestrian/walking route to the Maze lands – see our response to Q13 on future usage of the Maze.

24.10 We request that disused rail lines be protected for future rail use.

24.11 The current review of car parking being undertaken by the council is welcome. There are several key opportunities to develop surface car parks within the city centre into mixed use cohesive street networks places where people can live, shop, work and visit.

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

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

MAG Observation

25.01 It is worth mentioning that by 2030 we are unlikely to have fossil fuel powered cars and may have many fewer privately owned vehicles on the roads.

25.02 Many park and ride sites don't work as it is.

25.03 We recommend that LCCC commission a comprehensive integrated movement strategy for the region, with particular commitment to removing cars from the centre of Lisburn City, to set out the optimum needs for managing movement in a carbon descending context.

25.04 While we recognise and support the need to facilitate citizen's choosing public transport over their cars, and park and ride plays a part in that it is also important not to deaden urban centres with large surface car parks

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

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

MAG Observation

26.01 Yes, we support this and add that for this to be truly effective and successful it is vital that walking and cycling routes run through developments and are connected across the urban and rural environments - radially and tangentially - as well as to public transport halts - be they rail or bus.

26.02 Cycling to Belfast is really good- invest in the River Lagan Valley as a cycle/walking route from Lisburn City.

26.03 Develop strategies for getting cars out of Lisburn City. Evidence from other cities such as Bristol shows that a rise in walking and cycling and uptake of public transport only occurs when you de-car and deliberately make it more difficult/costly to use a car

27.00 Q30 Key Issue 25: Connecting People and Places – Greenways

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

MAG Observation

27.01 We support the creation of greenways especially on over engineering arterial dual carriageway and also motorway routes. In the context of moving towards car usage reduction these offer great scope for allocating former car lanes to buses, also cycle and walking routes – and the substantial greening of these routes (eg with boulevard

character to enhance their attractiveness for cyclists and walkers) – historic tree lined boulevard city streets like Princes Park Avenue in Liverpool offer helpful precedents.

27.02 The designation of the River Lagan Valley as a primary greenway is obvious and we support this wholeheartedly.

27.03 We request that former rail lines be protected for future rail use and not given over to walkway/cycle greenways at this point.

28.00 Q31 Key Issue 26: Renewable Energy

✓ ***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.

MAG Observation

28.01 In a climate in which wind turbines in sensitive locations generate objections at planning application stage we request that preference be given to photovoltaic and solar renewable energy provision. This technology is one that can form local businesses – supporting the local economy and detracts less from important rural landscapes.

28.02 Solar panels on house rooftops, and in time extensive farms of them on an industrial scale across rural fields may also detract visually and in terms of biodiversity. A policy is needed to guard against fields of PV panels and to encourage the location of such panels on buildings in ways that are not aesthetically detrimental – for instance rather than placing them on the main house roof or in the garden a location on a secondary lean-to shed or covered walkway /clothes drying area may be more subtle and visually sensitive.

29.00 Q33 Key Issue 28: Waste Management

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

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

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.

MAG Observation

30.01 We support this option and request that the LDP afford even greater protection to the management and protection of conservation areas to prevent inappropriate development occurring within them and their setting. We request that LCCC guards against issues that detract from Conservation Areas such as inappropriate signage, street furniture and traffic management. Design guidance specific to these Conservation Areas will help LCCC protect historic town centres and ensure that additions to the streetscape are appropriate and will enhance existing character. We request that LCCC planning authority create a protocol whereby applications within its Conservation Areas are automatically referred for MAG Design Review - The Ministerial Advisory Group has the expertise to perform this and advise appropriately.

30.02 We further request the removal of permitted development rights to better protect the retention of authentic historic fabric such as windows/doors; rainwater goods; dormer cheeks; fascias, eaves, verges etc.

30.03 We further request that this option make provision for LCCC to undertake a local listing process to provide a baseline audit of all its built and natural heritage assets. This should including mapping.

- Vacancy
- Condition
- Buildings at risk/in need of maintenance
- Heritage significance locally and regionally
- Priority repairs and costings involved in rescuing buildings at risk

31.00 Q35 Key Issue 30: Protecting and Enhancing Natural Heritage Assets

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 protection designations across the Council area.**

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

31.01 We suggest that “protection” is inserted as reflected above as we are unsure of what the purpose of “environmental designations” would be.

The Appendices

32.00 Q36 Appendix B: Equality Impact Assessment

Do you have any comment to make on Appendix B?

Yes No

MAG Observation

32.01 The MAG welcomes the Section 75 Policy Screening Form's intention to stimulate public comment and help interested parties to become involved in a more meaningful way at this earliest stage of plan preparation.

32.02 Factors which could contribute to/detract from the intended aim/outcome of the policy/decision include:

1. Financial/economic
2. Legislative
3. Political (eg. uncertainty around the Stormont structures, effect of BREXIT)

32.03 Who are the internal and external stakeholders (actual or potential) that the policy will impact upon? As well as those already listed include: 'The man, woman and child in the street' - of all backgrounds

33.00 Q37 Appendix C: Policy Review (PPSs)

Do you have any comment to make on Appendix C?

Yes No

MAG Observation

33.01 We note that where a council adopts its Plan Strategy, existing policy retained under the transitional arrangements shall cease to have effect in the district of that council and shall not be material from that date.....

33.02 Is it the intention of LCCC to prepare its own new policies?

33.03 When and how will these be consulted upon?

33.04 The MAG notes that the Council wishes to obtain views on the existing suite of operations policies identified in Table 1 and requests further opportunity to comment in greater detail on same.

33.05 We are particularly interested in new policy being developed on: -

- **AMP1** Creating an Accessible Environment
- **AMP2** Access to Public Roads
- **New Policy entirely:** Creation of Street Footprints
- **AMP3** Access to Protected Routes
- **AMP4** Protection for New Transport Schemes (renamed as Protection for New Movement Schemes)
- **AMP7** Carparking and Servicing Arrangements
- **AMP9** Design of Car Parking - reinstate and renew policy
- **AMP10** Provision of Public and Private Car Parks
- **PPS7(Addendum): Safeguarding the Character of Established Residential Areas (August 2010)**
LC2 Create new policy around The Conversation or Change of Use of Existing Buildings to Flats or Apartments
- **PPS12: Housing in Settlements (July 2005)**
Create new policy for mixed tenure, socially mixed housing and/or mixed housing and other mixed uses in new and existing terraced street networks
- **PPS13: Transportation and Landuse**
General Principle 10
Reinstate policy requesting rural public transport schemes should be developed to link rural dwellers to essential facilities and larger settlements

General Principle 11
Reinstate policy requesting: Innovative measures should be developed for the safe and effective management of traffic, to include shared movement
- **PPS16: Tourism**
TSM1 Update policy on tourism amenities in the countryside to favour location of such development within and/or on edge of town settlements where possible.

TSM4 Update Tourism Development in the Countryside - Exceptional Circumstances to increase protection for the finite resource that is the countryside.
- **PPS21 Sustainable Development in the Countryside (June 2010)**
CTY8-Ribbon Development-New policy to be developed on this - see our earlier comments in this consultation response.

CTY15 - The Setting of Settlements - create new policy to help protect the setting of settlements (including conservation areas)

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

Do you have any comment to make on Appendix F?

Yes ✓

No

MAG Observation

34.01 To what extent does the Annual Housing Need Assessment Publication (NIHE) take account of the implications of population projections likely to be brought about by BREXIT : ie. the strong likelihood of a decrease in the number of non-national Europeans in the council jurisdiction because of outmigration of those already resident here, in tandem with a reduction in immigration

34.02 Para 5.2 However, uncertainty in the economy, including reduced public expenditure, welfare reform, BREXIT and high levels of negative equity could all adversely affect the housing market and hinder a sustained recovery.

35.00 Q39 Do you have any comments on the remaining appendices?

Yes ✓

No

MAG Observation

35.01 Map 10 Proposed Extension to Lisburn City Centre: We do not support extending Lisburn City Centre - for further elaboration on this see our observation on Q16

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

Yes

No ✓

37.00 Conclusion

37.01 MAG's comments are offered in a spirit of constructive support to the Council. We would be delighted to meet with LCCC to help clarify any aspect of this which may be unclear or to discuss proposals.

Response prepared by:

Mary Kerrigan

Nicola Waddington

Greg Keefe

MAG Expert Advisors

25 | 5 | 17