

— View selected questions



**MAIN QUESTION**

**Name:**

Una Somerville

+ ADD TO ANALYSIS

**Address**

20 Wood Grange, Newtownabbey United Kingdom

+ ADD TO ANALYSIS

**Post Code**

BT37 0WG

+ ADD TO ANALYSIS

**Email**

unasomerville@btinternet.com

+ ADD TO ANALYSIS

**Phone Number**

07866508610

+ ADD TO ANALYSIS

**Are you responding as an individual?**

No

+ ADD TO ANALYSIS

**Are you responding on behalf of an organisation?**

Yes

+ ADD TO ANALYSIS

**Organisation and Job Title (if applicable):**

Somerville Consulting

+ ADD TO ANALYSIS

**Are you an Agent responding on behalf of a client?**

Yes

+ ADD TO ANALYSIS

**Client Name , address (if applicable):**

Mr. Colin Blythe 80 Glen Road Comber BT23 5QS

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

**Please indicate how you would like your representation to be dealt with at Independent Examination (please select one item only): Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.**

Oral Hearing (Choose this procedure to present your representation orally at the public hearing) Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your



representation considered in written form only.

+ ADD TO ANALYSIS

### Soundness of the Plan

No

+ ADD TO ANALYSIS

**If you believe the strategy is unsound, please indicate which tests of soundness it fails and provide your reasoning below.**

Consistency Test C1

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

### Test P1 Comments

No answer

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

### Test P2 Comments

No answer

+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

### Test P3 Comments

No answer

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+ ADD TO ANALYSIS

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+ ADD TO ANALYSIS

### Test P4 Comments

No answer

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+ ADD TO ANALYSIS

### Consistency Tests

No

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+ ADD TO ANALYSIS

### Test C1 Comments

The hierarchy of settlements in the RDS allows for sustainable and reasonable growth at all levels including towns. The subject lands at Glen Road Comber lie adjacent to the built edge of Comber to the west. If these lands were to be included in the settlement limit for housing, it would allow for a sustainable extension of the town in this area. Comber falls within the second highest tier in the Settlement Hierarchy "Small Towns". The current Draft Plan Strategy will not meet the RDS strategic objective in regard to Towns: "Support our towns, villages and rural communities to maximise their potential". Potential can only be realised with effective provision for growth and Comber as a small town is noted in Policy SGS 1: Spatial Growth Strategy states which "Consolidate the role and function of the small towns of Comber and Donaghadee as local service centres for housing, employment, facilities and services to support the local population and their rural hinterlands". The settlement limit should therefore be extended around the lands centred at no. 80 Glen Road Comber BT23 5QS to allow the proposed potential to be realised as envisioned in the RDS.

+ ADD TO ANALYSIS

### C2 Did the Council take account of its Community Plan?

Yes

+ ADD TO ANALYSIS

### Test C2 Comments

YES

+ ADD TO ANALYSIS

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+ ADD TO ANALYSIS

### **Test C3 Comments**

No answer

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+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

### **Test C4 Comments**

No answer

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+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

### **Test CE 1 Comments**

No answer

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+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

### **Test CE 2 Comments**

No answer

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+ ADD TO ANALYSIS

+ ADD TO ANALYSIS

### Test CE 3 Comments

No answer

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+ ADD TO ANALYSIS

**CE 4 It is reasonably flexible to enable it to deal with changing circumstances?**

No

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+ ADD TO ANALYSIS

## Test CE 4 Comments

The Draft Plan Strategy requires more flexibility to deal with the provision of land for housing in smaller towns, if they are to thrive as envisaged. It is not sufficient in SGS 1: Spatial Growth Strategy to say that smaller town will accommodate 10% of the allocation of housing without allowing for that growth by specific reference to availability of land, suitability of land and proximity to existing built development. Extension of the development limit will be needed but in a sensitive and pragmatic way at the western edge of Comber around the subject lands.

Changes are required to the text of SGS 1: Spatial Growth Strategy to include reference to assessing housing land in a practical and pragmatic way by reference to land being available, being suitable and in close proximity to existing urban areas, in other words sensitive urban extensions must be considered in small towns.

SGS 4: Strategic Housing Allocation needs close monitoring as LDP timetables have taken far too long to be delivered and allocation becomes outdated. Availability of land is the key to delivery of the strategic objectives of the RDS and the Draft Plan Strategy as currently drafted does not ensure the needed flexibility.

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+ ADD TO ANALYSIS

**If you consider the draft Plan Strategy to be unsound please provide details of changes you suggest to make the draft Plan Strategy sound.**

No answer

Monitoring of the draft Plan Strategy?

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No answer

+ ADD TO ANALYSIS

**Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)**

No answer

+ ADD TO ANALYSIS

**draft Habitats Regulations Assessment(HRA)**

No answer

+ ADD TO ANALYSIS

**Equality Impact Screening Report**

No answer

+ ADD TO ANALYSIS

**Rural Needs Impact Assessment**

No answer

+ ADD TO ANALYSIS

**Please add any additional comments**

No answer

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Example tag 1 +

Example tag 2 +

Address	Applicant	Reference and site location
Lands at 80 Glen Road Comber	Colin Blythe	<p data-bbox="1256 80 1986 146">8634a2b8-210b-4f6f-b247-602ba6a78306</p>  An aerial photograph showing a large, irregularly shaped green field outlined in yellow. The field is situated next to a residential area with several houses and a road. The surrounding area includes other green fields and a road.

