Armagh City, Banbridge & Craigavon Borough Council

Local Development Plan 2035
Draft Plan Strategy
Representation Form

Representations to this public consultation should be submitted to the Local Development Plan Team by the online Consultation Portal, email or post. Respondents are encouraged to submit representations via the Consultation Portal:

armaghbanbridgecraigavon.citizenspace.com/planning/abc-draft-plan/

If submitting your representation by email or post, please complete this Representation form and email it to ldp@armaghbanbridgecraigavon.gov.uk or alternatively post a hardcopy to: -

Planning Department
Local Development Plan Team
Armagh City, Banbridge and Craigavon Borough Council
Banbridge Civic Building
Downshire Road
Banbridge
BT32 3JY

THE CONSULTATION PERIOD RUNS FROM 13 OCTOBER 2026 TO 5.00PM ON TUESDAY 8 DECEMBER 2026. ALL REPRESENTATIONS MUST BE RECEIVED DURING THE CONSULTATION PERIOD.

Section A | Your Details

Q1 Are you responding as an individual, organisation or group, or as an agent acting on behalf of an individual, organisation or group? *Please **select one option** only:*

- ☐ **Individual** *(Please fill in the remaining questions in this section, then proceed to Section D)*
- ☐ **Organisation/Group** *(Please fill in the remaining questions in this section, then proceed to Section B)*
- ☐ **Agent acting on behalf of the above** *(Please fill in the remaining questions in this section, then proceed to Section C)*

Q2 Contact Details

Title	
First Name	**Last Name**
Company Name *(if applicable)*	
Address	
Email	
Telephone	

Q3 Did you respond to the Council's Preferred Options Paper?

☐ **Yes** ☐ **No** ☐ **Unsure**

Section B | Organisation/Group

If you have selected that you are responding as an organisation/group, there are a number of additional details that we need to obtain from you.

Organisation / Group Name	
Your Job Title / Position	
Organisation / Group Address	
Town	
Email *(if different to details in Q2, Section A)*	
Telephone	

Section C | Agents

If you have selected that you are an agent, responding on behalf of another individual, organisation or group, there are a number of additional details that we need to obtain from you.

Please provide details of the client that you are representing.

Client Contact Details

Title	
First Name	**Last Name**
Address	
Town	
	Postcode
Email	

Section D | Soundness

The draft Plan Strategy will be examined at Independent Examination in regard to its soundness. Accordingly, your responses should be based on soundness and directed at specific strategic policies or proposals that you consider to be sound or unsound, along with your reasons. The tests of soundness are set out in Appendix 1.

Anyone wishing to make a representation seeking to change the draft Plan Strategy should clearly explain why they consider the document to be unsound having regard to the soundness tests. It is important that your representation identifies the most appropriate soundness test(s) which you believe the draft Plan Strategy fails to meet. There will be no further opportunity to submit information once the consultation period has closed unless the Independent Examiner requests it.

Those who make a representation seeking to change the draft Plan Strategy should also state whether they wish to be heard orally at the Independent Examination.

Q4 Please indicate if you would like your representation to be dealt with by (please select one option only):

- ☐ **Written** *(Choose this procedure to have your representation considered in written form only)*
- ☐ **Oral Hearing** *(Choose this procedure to present your representation orally at the Independent Examination)*

Unless you specifically request to present your representation orally at the Independent Examination, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.

Section E | Is the draft Plan Strategy Sound?

Do you consider the draft Plan Strategy to be Sound? (Please select one option only).

- Yes
- No (Go to Section F)

Q5

If you consider the draft Plan Strategy to be sound and wish to provide supporting comments, please set out your comments below.

Section F | Is the draft Plan Strategy Unsound?

This section asks you to identify which Part, Section, Policy and/or proposal of the draft Plan Strategy that you consider to be unsound.

If you consider that the draft Plan Strategy does not meet one or more of the tests of soundness set out in Appendix 1, you must clearly indicate the relevant Part, Section, Policy and/or proposal of the draft Plan Strategy and indicate which soundness test(s) you consider have not been met, having regard to Development Plan Practice Note 6 available at: **Development Plan Practice Note 6 Soundness (infrastructure-ni.gov.uk)**

Please note:
If you consider more than one Part, Section, Policy and/or proposal to be unsound, each must be listed separately and include the relevant soundness test(s) for each.

Your response should clearly identify the relevant soundness test(s), Part, Section, Policy, page number(s) and/or the proposal of the draft Plan Strategy. It should also provide details of why you consider it to be unsound and what change(s) you consider are necessary to make the draft Plan Strategy sound.

Please note, if you do not identify the relevant soundness test(s) your comments may not be considered by the Independent Examiner.

Q6 For that reason, you will need to identify the following:

Soundness test(s) No.	
Part	
Section	
Policy Title	
Page Number	
Proposals Map *(if applicable)*	

Please give full details of why you consider the draft Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as clear and concise as possible.

If you consider the draft Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the draft Plan Strategy sound.

If you have further comments to make on another Part, Section, Policy and/or proposal of the draft Plan Strategy please see appendix 2.

Section G | Sustainability Appraisal (SA) Report incorporating Strategic Environmental Assessment (SEA)

Do you have any comments on the SA Report?

☐ Yes ☐ No

If you have indicated Yes, please set out your comments on the SA Report below:

Section H | Draft Habitats Regulations Assessment (HRA)

Do you have any comments on the Draft HRA?

Yes No

If you have indicated Yes, please set out your comments on the Draft HRA below:

Section I | Draft Equality Screening Report

Do you have any comments on the Draft Equality Screening Report?

Yes No

If you have indicated Yes, please set out your comments on the Draft Equality Screening Report below:

Section J | Draft Rural Needs Impact Assessment (RNIA)

Do you have any comments on the Draft RNIA?

☐ Yes ☐ No

If you have indicated Yes, please set out your comments on the Draft RNIA below:

All responses are public documents and will be made available for public inspection and as part of the Independent Examination process. All responses will be held on a database in accordance with the provisions of the UK General Data Protection Regulation (UK GDPR).

Full details of how the Council will process any personal data you include in your response, is set out in the Council's LDP Privacy Notice which can be viewed at armaghbanbridgecraigavon.gov.uk/resident/local-development-plan-residents/

Signature: _____ Date: _____

Appendix 1 | Tests of Soundness

Procedural tests

P1	Has the Development Plan Document (DPD) been prepared in accordance with the Council's Timetable and the Statement of Community Involvement?
P2	Has the Council prepared its Preferred Options Paper and taken into account any representations made?
P3	Has the DPD been subject to Sustainability Appraisal including Strategic Environmental Assessment?
P4	Did the Council comply with the regulations on the form and content of its DPD and on the procedure for preparing the DPD?

Consistency test

C1	Did the Council take account of the Regional Development Strategy?
C2	Did the Council take account of its Community Plan?
C3	Did the Council take account of policy and guidance issued by the Department?
C4	Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining council's district?

Coherence and Effectiveness tests

CE1	The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Appendix 2 | Further comments to Q6

Please note, if you do not identify the relevant soundness test(s) your comments may not be considered by the Independent Examiner.

Q6 For that reason, you will need to identify the following:

Soundness test(s) No.	
Part	
Section	
Policy Title	
Page Number	
Proposals Map *(if applicable)*	

Please give full details of why you consider the draft Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as clear and concise as possible.

If you consider the draft Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the draft Plan Strategy sound.