



**Armagh City Banbridge & Craigavon
Borough Council**

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Lisburn & Castlereagh City Council
Local Development Plan Team
Civic Headquarters
Lagan Valley Island
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Our Ref: COR 2915/ LCCC DPS

Date: 17th December 2019

Dear Lois,

**LISBURN & CASTLEREAGH CITY COUNCIL, LOCAL DEVELOPMENT PLAN 2032 –
DRAFT PLAN STRATEGY**

Armagh City, Banbridge and Craigavon Borough Council welcomes the opportunity to comment on Lisburn & Castlereagh City Council's (LCCC) Draft Plan Strategy and looks forward to continued engagement as each of our council's respective plans are progressed.

In accordance with guidance issued by both the Department for Infrastructure and the Planning Appeals Commission in relation to representations and 'soundness', it is considered that the issues raised in the Council's response below relate to the following soundness tests:

Consistency Tests

- 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 Development Plan Document (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.

As you are aware a number of key cross boundary issues have already been discussed at a strategic level, including the protection of environmental designations, natural heritage and landscapes which are close to or straddle the boundary, strategic greenways - both primary and secondary routes and mineral development. Whilst our comments attached at Appendix 1 primarily relate to these areas of common interest, comments are also provided on those matters where the Council considers that further clarification would strengthen your LDP.

I trust that our comments will be fully considered by your Council and welcome the opportunity to discuss these matters further.

Yours sincerely

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Appendix 1

PLANNING AGREEMENTS

Strategic Policy 07 – Section 76 Planning Agreements

- Council notes the introduction of Strategic Policy 07 Section 76 Planning Agreements. Whilst the Council notes reference made to 'The Section 76 Planning Agreements Framework' within the policies justification and amplification, further clarity in relation to thresholds for the implementation of Section 76 Planning Agreement would be welcomed.
- Council notes reference to Planning Agreements under Operational Policy HOU 6, however also notes the ambiguity as to the thresholds for when Section 76 agreements would be implemented, and in particular, as to what constitutes "smaller developments".

HOUSING

Strategic Policy 08 – Housing in Settlements

- Council notes that the future potential of 11,578 dwelling units (which closely reflects the overall strategic housing allocation of 11,550 dwelling units) does not appear to allow for Urban Capacity Study or windfall potential.
- Council notes that windfall potential shown in Table 3 is only projected over a 12 year period.

ECONOMIC DEVELOPMENT

Strategic Policy 11 – Economic Development in Settlements

- Council notes the reference to a 'further review of employment land will be carried out at LPP stage'. Council would welcome clarification as to the scope/terms of this review and if the review could potentially return a significant quantity of additional employment lands which may impact economic growth within our Borough.
- Council notes that the 141ha Maze lands site is safeguarded from development proposals that could undermine its regional/strategic significance and it is excluded from the employment land review and any accompanying figures.

STRATEGIC MIXED USE SITES

SMU03 – Sprucefield Regional Shopping Centre

- Council notes that Sprucefield Regional Shopping Centre has not been defined within a network and hierarchy of retail centres.
- Council is concerned in relation the Sprucefield Regional Shopping Centre that due consideration has not been given to the impact on town centres within our Borough and would welcome clarification/further discussion on how Sprucefield Regional Shopping Centre aligns with the regional direction to secure a town centre first approach for the location of future retailing and other main town centre uses.

MINERALS

Strategic Policy 13 Mineral Development

- Council notes the overall balanced approach to mineral development, however it is unclear at this stage how it will affect the area on and around Lough Neagh and Portmore Lough, which is an area of common interest between our Councils. SP 13 recognises that the Lagan Valley AONB and the existing Areas of High Scenic Value, including on and around Lough Neagh and Portmore Lough, require particular sensitivity in terms of mineral development and that these areas may therefore benefit from additional protection as 'Areas of Mineral Constraint', when identified at Local Policies Plan (LPP) stage. However, Strategic Policy 19 (Protecting and Enhancing Natural Heritage) indicates on Page 128 that these existing designations will be reviewed at LPP stage. Therefore, as our Council moves towards formulating an approach to this shared environmental asset at dPS stage, it is unclear as to the level and extent of protection that it will be afforded within the LCCC LDP (following a review), including the level of constraint on mineral development that may be imposed. Further engagement on these cross-boundary issues would therefore be welcomed going forward.
- **Policy MD1 – Environmental Protection**
Council notes the overall policy approach to environmental protection within or close to an area that has been designated, or is proposed for designation to protect its landscape, scientific or natural heritage significance. Clarification however would be welcomed on how Policy MD1 and Policy MD3 for Areas of Mineral Constraint relate to each other.
- **Policy MD3 – Areas of Mineral Constraint**
Further to the comments on Strategic Policy 13, Council notes the policy approach to Areas of Minerals Constraint and that further work in identifying any such areas will be taken forward at LPP stage.
- **Policy MD6 – Mineral Safeguarding Areas**
Council supports the approach taken with Mineral Safeguarding Areas, to protect workable mineral resources of economic or conservation value from being sterilised by other surface development. This will contribute towards a sustainable approach to mineral development in line with the SPPS that supports the local and regional supply chain and overall economic growth. It is noted that these Mineral Safeguarding Areas will be taken forward (proposed) at Local Policies Plan stage as appropriate.

HISTORIC ENVIRONMENT AND ARCHAEOLOGICAL REMAINS

Strategic Policy 18– Protecting and Enhancing the Historic Environment and Archaeological Remains

- The Council notes the overall approach to protecting and enhancing the historic environment and archaeological remains which is in line with the RDS, SPPS and PPS6.
- The Council notes that there is no reference in Strategic Policy 18 bullet points a, b or c to Areas of Significant Archaeological Interest (ASAI's). One such ASAI, The Giant's Ring, is located within the Borough.

NATURAL HERITAGE AND LANDSCAPES

Strategic Policy 19 – Protecting and Enhancing Natural Heritage

- Council notes the carrying forward of the existing Local Development Plan natural heritage designations (AoHSV, LLPA, landscape wedges and SLNCI) and acknowledge that further work is planned in reviewing these existing designations as part of the Local Policies Plan. Council seeks clarification however on the scope and purpose of this review. Will individual policies, site boundaries, new designations form part of this review?

PETROL FILLING STATIONS AND RETAIL DEVELOPMENT IN THE COUNTRYSIDE

Operational Policy TC 6 – Petrol Filling Stations and Roadside Service Facilities.

- Council notes the approach towards petrol filling stations and roadside service facilities. In particular Council notes that there are no size restrictions for proposals in the countryside and that there is no policy direction for other types of retail development in the countryside within the operational planning policy for Town Centres, Retailing and Other Uses.

TRANSPORTATION

Operational Policy TRA5 –Strategic Greenways and Disused Transport Routes

- Council welcomes Policy TRA 5 which protects these routes and promotes appropriate opportunities for their re-use along with a presumption against development that would prejudice their use or future use for transport or recreational purposes. This approach will ensure that opportunities to develop Strategic Greenways, which have been identified within DfI's Strategic Plan for Greenways are maintained and reflects the preferred approach of this Council.

Operational Policy TRA9 – Park and Ride/Park and Share Car parks

- Council notes the approach to the development of new or extension of existing Park and Ride/Park and Share car parks. Council would welcome clarification regarding the extension of the park and ride car park at Moira train station which would help to alleviate traffic congestion within both Council areas.