



Comhairle Ceantair
an Iúir, Mhúrn
agus an Dúin
**Newry, Mourne
and Down**
District Council

Date: 8 January 2020

Ref: LCCC LDP dPS

Local Development Plan Team
Civic Headquarters
Lagan Valley Island
Lisburn
BT27 4RL

Dear Sir/Madam

Re: Lisburn & Castlereagh City Council's Local Development Plan 2032 – Draft Plan Strategy

Representation Response of Newry, Mourne and Down District Council

I refer to the publication of your draft Plan Strategy for your Local Development Plan (LDP) and thank you for the opportunity to comment.

As an adjoining council/planning authority with a common boundary, Newry Mourne and Down District Council (NMDDC) is a statutory consultee in the preparation of your LDP. In sharing a boundary with Lisburn & Castlereagh City Council (LCCC), this Council has an interest in the content of your draft Plan Strategy (dPS), the first of your two development plan documents.

We recognise that consultation and engagement with neighbouring Councils provides the opportunity to:

- identify cross border issues in the areas of economic development, housing, transport, general infrastructure, and the environment
- advise of matters of collective interest including the evidence base which informs the draft Plan Strategy,
- seek agreement and co-operation, where possible, on cross boundary issues identified,
- ensure that regional policy development, local transport plans and joint working is appropriately linked to the decision making role.

In this respect we acknowledge the mutual co-operation and constructive engagement through meetings and workshops that have taken place between officers from our respective Local Development Plan Teams during the preparation of your dPS to identify cross boundary issues and discuss areas of mutual interest.

The LDP will be tested at Independent Examination in respect of its 'soundness'. Departmental guidance as set out in Development Plan Practice Note 6: Soundness (DPPN6) advises that a council, *'must have regard to other relevant plans, policies and strategies, not only in its own district but also*

**Oifig an Iúir
Newry Office**
O'Hagan House
Monaghan Row
Newry BT35 8DJ

**Oifig Dhún Pádraig
Downpatrick Office**
Downshire Civic Centre
Downshire Estate, Ardgiass Road
Downpatrick BT30 6GQ

0300 013 2233 (Council)
0300 200 7830 (Planning)
council@nmandd.org
www.newrymournedown.org

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in its adjoining area’. Reference in this respect is made to Consistency Test C4 and Coherence and Effectiveness Test CE1.

In respect of the above, it is vitally important that, in the progression of the dPS to Independent Examination, LCCC is satisfied that it is in compliance with soundness tests of C4 and CE1. Through continued cross border co-operation and collaboration, the economic, social and environmental interests of Newry Mourne and Down need to be fully taken into account in the strategic planning and economic development of our adjoining districts. In guiding future development and sustainable growth, and in the co-ordinated delivery of strategic development, infrastructure and services, it is important that LCCC, through its dPS, recognise, acknowledge and be ever mindful of Newry, Mourne and Down District as it borders the Republic of Ireland, in particular its placement on the Dublin – Belfast Economic Corridor. The city of Newry together with the neighbouring port of Warrenpoint is strategically positioned on the Dublin – Belfast Economic Corridor serving as both a regional and international gateway.

In reference to the dPS, and associated documents, the Council notes the development of six plan objectives to deliver the vision for the LDP and how they relate to and seek to achieve the spatial aspects of LCCC’s Community Plan. It is also noted that these objectives also link directly and are implemented through the strategic policies, spatial strategy and operational policies.

LCCC’s spatial strategy and associated settlement hierarchy are noted.

Under the objective ‘A: A Quality Place’ the strategic housing allocation has been informed by the eight indicators provided by the SPPS. The identification of land at West Lisburn/Blaris for additional strategic housing growth of up to 1500 dwellings is noted. The strategic policy for housing in settlements and the countryside in addition to education, health, community and culture are also noted. Operational policies for residential development including affordable housing in settlements and specialist accommodation are noted, as are the policies for community facilities in the settlements and development in the countryside.

Under objective ‘B: A Thriving Place’ the strategic employment allocation identifying a hierarchy of sites consisting of Strategic Mixed Use Sites at West Lisburn/Blaris and Purdysburn/Knockbracken and Local Employment Sites are noted as is the level of developable land for economic uses that remains in comparison to the likely need over the plan period. The Council notes the intention to retain the Maze Lands as a Strategic Land Reserve of Regional Importance while not forming part of the overall quantum of employment land.

The strategic policy for economic development in the countryside and mineral development are noted and in particular the acknowledgment that the areas most at risk in terms of environmental impacts of mineral development include the existing Area of High Scenic Value of Magheraknock Loughs which is a designation which extends into our District. In respect of this we would welcome discussion on your future work in identifying areas of mineral constraint. It is also acknowledged that minerals development is a regional issue and that the evidence base is still being developed. Operational policy, including that on Valuable Minerals and Unconventional Hydrocarbon Extraction is noted.



Under objective 'C: A Vibrant Place' the retail hierarchy excludes Sprucefield Shopping Centre and instead refers to it having its own policy in recognition of its importance as a destination. It also includes strategic policy for Town Centres, Retailing and Other Uses and the Evening/Night-time Economy. Operational policy for town centres, retailing and other uses is noted.

Under objective 'D: An Attractive Place' the strategic policy for tourism aims to promote a sustainable approach to tourism development, safeguarding key tourism assets while providing opportunities for growth. Strategic policy for open space seeks to protect and enhance existing open space and provide new open space in addition to supporting and protecting a network of accessible green and blue infrastructure and promote the development of strategic and community greenways. The Council acknowledges that further work is to be carried out in this respect and would welcome the opportunity for further engagement in the future. Operational policy in respect of tourism and open space are also noted.

Objective 'E: A Green Place' provides strategic policy for protecting and enhancing the historic and natural environment. The Council notes that while existing designations are carried forward from the existing development plan that further work in reviewing existing and future landscape designations will be assessed as part of the Local Policies Plan. Given our shared boundary and transboundary landscape there is a need to ensure there are no potential issues or adverse impacts arising from landscape designations and the Council would seek further discussion at the appropriate time. The operational policies for historic environment, archaeology, and natural heritage are also noted.

Objective 'F: A Connected Place' seeks to support sustainable transport and other infrastructure. It provides strategic policy for transportation infrastructure, renewable energy, telecommunications and other utilities, waste management and flooding. Given the transboundary nature of some of these issues the Council would welcome further discussion on matters such as improved transport connections, the facilitation of park and ride schemes, and strategic greenways. The acknowledgement that a joined-up approach in relation to waste management is needed and the Arc21 arrangements are noted as is the encouragement of the use of Sustainable Drainage Systems to alleviate surface water flooding. The associated operational policies for transport and infrastructure are also noted.

The Council notes the accompanying supporting documents, in particular the Technical Supplements, Supplementary Planning Guidance and the Sustainability Appraisal.

In conclusion, Newry, Mourne and Down District Council considers that the contents of your draft Plan Strategy documents are not in conflict with the ongoing development of our own draft Plan Strategy. We look forward to continued consultation and engagement with you on matters of common interest at the appropriate time in our respective work programmes.

Yours sincerely