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Date: 11 March 2021

## HISTORIC ENVIRONMENT DIVISION SUBMISSION

**This representation relates to the Lisburn and Castlereagh City Council, Local Development Plan 2030 Draft Plan Strategy, Consultation on Focussed Changes Addendum including Minor Changes Schedule (January 2021) and the Addendum to the Sustainability Appraisal report.**

Historic Environment Division (HED) has reviewed the proposed focussed and minor changes to the draft Plan Strategy and the addendum to the draft Sustainability Appraisal. Generally, the changes which relate to the historic environment are very welcome and address many of the issues raised in our original representation DPS-030.

### Strategic Policy 18

The proposed changes to Strategic Policy 18 Protecting and Enhancing the Historic Environment and Archaeological Remains (MC6A, MC6B and MC6C) are now considered to be sound under C3 and CE4, having taken our representation comments into account. To achieve alignment with the hierarchical approach of the strategic policy within SPPS toward the historic environment, changes relating to the order of the policy criteria were also recommended. This is an important alternation which has not been included as a change and we refer back to comments made in our representation.

### SMU 01 West Lisburn/Blaris

In order to address the likely impact on previously unidentified below ground archaeological remains within proposed zonings, we recommended in our representation the inclusion of additional text, to outline the requirement to consult DfC. This recommendation has not been included as a proposed change. HED emphasises the need for appropriate consultation with DfC and refers back to the recommended insertion, outlined in our representation.

### Monitoring & Review

To demonstrate the effectiveness of the Plan Strategy to achieve its objectives for the historic environment, and to provide the basis to trigger any requirement to amend the strategy, policies

and proposals, the plan should be subject to robust monitoring. Changes to the proposed monitoring indicators, as set out in APPENDIX E: Monitoring Framework for Plan Objective E of the draft Plan Strategy, have not been proposed as part of this consultation. HED therefore refers to our representation comments and reiterates the monitor indicators are insufficiently robust to monitor the effectiveness of the plan against the historic environment objectives and remains 'unsound' when assessed against CE3.

HED has welcomed the engagement through the plan process to date and the Council is commended on the comprehensive strategic approach, structure and format of the draft Plan Strategy and use and application of their historic environment evidence to inform plan strategies and policies. As the plan moves forward to the Local Policies Plan stage, we encourage further engagement with the Council, particularly with regard to the Countryside Assessment and Landscape Character Assessments to inform appropriate consideration of land zoning proposals, for the plan area.