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Mr Conor Hughes  
Planning Manager  
Lisburn & Castlereagh City Council  
Civic Headquarters  
Lagan Valley Island  
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19 December 2019

Our Ref: P/FP/LDP/66

Dear Conor

### **Lisburn & Castlereagh City Council Local Development Plan 2032 - Public Consultation on Draft Plan Strategy**

Antrim and Newtownabbey Borough Council would like to congratulate Lisburn and Castlereagh City Council on the launch of its Local Development Plan draft Plan Strategy (dPS) document. As a statutory consultee, this Council welcomes the opportunity to comment on its contents.

The Council notes the Strategic Policies, Spatial Strategy and operational policies for the LCCC area, as well as accompanying documentation.

The Council has considered relevant matters of cross boundary interest and would highlight the following matters:

#### Employment Lands

- The Council notes that the dPS designates the Maze Lands as a Strategic Land Reserve of Regional Importance and that the area of the site is approximately 141 hectares. The dPS advises that there is potential to provide a range of flexible commercial accommodation and business parks at the Maze Lands. However, no detail is provided on the Maze site nor is there an analysis of it in the Council's Employment Land Review. Without this information the Council is concerned that the potential impact of future development of this site on neighbouring Council areas has not been fully considered particularly when this is viewed in combination with the quantum of employment land proposed to be allocated across the Council area (583.45 hectares zoned with 220.68 hectares undeveloped (excluding the Maze site)). The Council also notes that there is no clear reference in the published Sustainability Appraisal in relation to the social, economic and environmental impacts of the lands at the Maze coming forward as a Strategic Land Reserve of Regional Importance.

- In addition, the Council would question the need for an additional 220 hectares of undeveloped employment lands on the basis of the evidence contained in relation to future need as outlined in the published Employment Land Review. As indicated above this does not take account of the potential development of lands at the Maze for economic/employment purposes. The Council is concerned that LCCC has not demonstrated a need for this quantum of employment lands nor addressed the economic impact of this potential level of economic growth on the ANBC area, including impact on the Metropolitan Newtownabbey Area, the Hub Town of Antrim and this Council's proposed Strategic Employment Locations (including the Regional Gateway of Belfast International Airport).

#### Strategic Policy 13 and Minerals Development Protection

- The Council notes in the dPS that a coal and lignite reserve is identified at Lough Neagh and around Portmore Lough. The Plan states that 'this lignite deposit is a strategically significant reserve albeit one that is highly unlikely to be developed in the near future'. Policy MD4 then goes on to state that in terms of valuable minerals the exploitation of such minerals will be considered on their own merits. The Council therefore is unclear if your draft Plan Strategy would permit extraction of the lignite during the lifetime of your Plan which could have cross boundary implications for Antrim and Newtownabbey. This Council's position as stated in its own draft Plan Strategy (Para 12.8) is that the strategic lignite reserve near Crumlin should not be extracted until such times as the potential environmental impacts of such fuel extraction are known.

Therefore the Council views that these elements of the Plan as potentially unsound based on the following tests of soundness:

- *P3. Has the plan been subject to sustainability appraisal including Strategic Environmental Assessment?*
- *C1. Did the council take account of the Regional Development Strategy?*
- *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?*
- *CE1. The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans 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.*

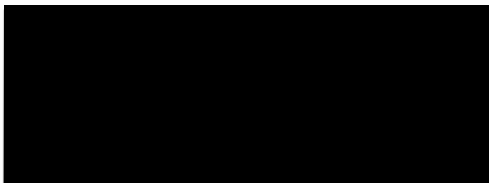
The Council also wishes to comment on the publication of your Neighbouring Council's Consultation and Engagement Strategy (NCCES). It is noted that the aims of the consultation strategy provide the opportunity with neighbouring councils to identify cross boundary issues in the areas of economic development, housing, transport and general infrastructure; advise neighbouring Councils of matters of

collective interest including the evidence base which informs the Plan Strategy; seek agreement and co-operation, where possible, on the cross boundary issues identified and ensure that regional policy development, local transport plans and joint working is appropriately linked to the decision making role. As you are aware from previous correspondence this Council is committed to engaging with neighbouring Councils on issues of common importance and to this end is currently represented on the Belfast Metropolitan Area Spatial Working Group, the Belfast Metropolitan Transport Plan Project Board and the Lough Neagh and Lough Beg Forum. I would therefore wish to clarify that the Council has not endorsed your NCCES, but continues to look forward to ongoing engagement with your Council through the Working Groups set out above.

This response represents this Council's initial views on your draft Plan Strategy. We are however open to discuss these matters further and will therefore keep our position under review insofar as it impacts on our Council area and our own draft Plan Strategy.

Finally, we also look forward to further engagement with your Council as our respective plans progress and the Council reserves its right to respond further to your Local Development Plan at the Local Policies Plan Stage.

Yours sincerely



**Chief Executive**