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Dear John

RESPONSE TO ANTRIM AND NEWTOWNABBEY BOROUGH COUNCIL'S LOCAL DEVELOPMENT PLAN CONSULTATION ON THE DRAFT PLAN STRATEGY

Thank you for the opportunity to participate in the formal consultation process for your draft Plan Strategy. Lisburn & Castlereagh City Council, as a neighbouring council, wish to provide the following comments.

You refer in your Plan Strategy document to have taken cross boundary issues into consideration in the preparation of your evidence base, and that you intend to continue to work with neighbouring authorities as your Plan progresses (paragraph 2.35). The Council welcomes the opportunity to continue to engage with you and other neighbouring Councils. As each of our Plans progress, we would encourage further mutual co-operation and engagement on the range of cross-boundary issues presented within our 'Consultation and Engagement Strategy' which was issued to you in June 2019.

In our response, we apply the approach to soundness in Development Plan Practice Note 06 Soundness (published by the Department for Infrastructure, version 2, May 2017). Departmental guidance outlines the requirements for the submission of a representation,

which states that any representation must demonstrate why the Development Plan Document (DPD) is not sound and/or justify how any proposed changes make the DPD more sound.

We consider elements of your proposed Employment growth in your draft Plan Strategy to be unsound for the following reasons:

Strategic Employment Locations (Page 77)

We note you have identified eighteen Strategic Employment Locations (SELs), comprising parcels of land of 10 hectares or greater in size that have been previously designated or partly developed as employment land. This includes Global Point which was zoned as a Major Employment Location in draft BMAP owing to its location close to major road infrastructure and proximity to Belfast City.

It states at SP 2.6 that two new SELs will be required at Antrim and Ballyclare and that the extent and location of these 10 hectare sites will be identified at the Local Policies Plan stage. The Regional Development Strategy 2035, whilst it recognises Antrim as a Main Hub within a clustering of Hubs (Diagram 3.2) places Ballyclare as a lower tier local hub.

Paragraph 5.15 of Employment Land Evaluation Report (ELER) contained in Evidence Paper 3 identifies that across the Antrim and Newtownabbey Borough Council area, there are approximately 156 hectares of zoned employment lands available. It is noted that this figure does not include any further land to be identified at the rural SELs at Nutts Corner or Belfast International Airport (BIA).

Your Evidence Paper 3 (paragraph 5.13 of the ELER) states that depending upon future demand, the overall land requirement to 2030 could be between 9.5 and 47.7 hectares.

Given that an ample supply of employment land already exists, the Council would question the need for two additional zonings in Antrim and Ballyclare of the scale envisaged in the draft Plan Strategy. In the absence of an appropriate evidence base, this proposal has the potential to adversely impact on the economic growth strategy of a neighbouring council.

The requirements of Consistency test C1 (Did the Council take account of the Regional Development Strategy); Coherence and Effectiveness Tests CE2 (the strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base); and Consistency Test CE4 (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) are not met.

Nutts Corner SEL (page77)

Your Evidence Paper 3 refers to Nutts Corner SEL being located 8 miles north of Lisburn. It is currently home to a number of large scale businesses mainly focused on storage and distribution, covering an area of approximately 90 hectares (paragraph 8.48). There is no current designation on the site and it is situated in the open countryside.

The Regional Development Strategy 2035 does not identify Nutts Corner as an area for employment growth, either strategically or locally.

The Antrim Area Plan 1984 -2001 identified the Nutts Corner area as not being suitable for industrial/commercial use due to limited supplies of water and that any substantial development would negatively impact on traffic. In response to on-going development pressures, the former Department of the Environment published a Development Control Advise Note for Nutts Corner in January 1995, although this was never formally adopted. The DCAN identified two distinct policy areas. Policy Area 1 between Moira Road and Dundrod Road was identified as suitable for road haulage and distribution industries and similar uses, and Policy Area 2, situated between the Moira Road and Nutts Corner Road where proposals would be considered on their own merits.

It is noted that your Plan Strategy wishes to build upon the information provided in the 1995 DCAN in order to safeguard this area against alternative uses and ensure that future development is appropriate and conditional upon key site requirements to ensure transport, utility infrastructure, digital connections and landscape enhancements are secured. This Council acknowledges that there is an existing policy context to support development within these two Policy Areas.

Provided the designation of Nutt's Corner as an SEL is only for consolidation and rounding-off to take account of the existing uses (as suggested in Evidence Paper 3) Lisburn and Castlereagh City Council has no objection to this proposal individually.

This Council does however object, in the absence of an appropriate evidence base, to the cumulative impact that Nutt's Corner could have on our economic growth strategy when taken in combination with the proposed extension at BIA and the two proposed SELs at Antrim and Ballyclare.

The requirements of Consistency test C1 (Did the Council take account of the Regional Development Strategy); Coherence and Effectiveness Tests CE2 (the strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base); and Consistency Test CE4 (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) are not met.

Belfast International Airport SEL (page 78)

Your Evidence Paper 3 acknowledges that Belfast International Airport (BIA) is situated 9.3 miles from Lisburn and identified in the RDS as a 'Gateway to Northern Ireland'. The Antrim Area Plan 1984-2001 identifies a compact boundary around the main airport with a variety of related airport uses.

This Council recognise the unique position BIA presents in being the main airport within Northern Ireland. As stated in our response to your Preferred Options Paper in April 2017, the Council still has concerns regarding the extent of the new area of land to be zoned around BIA and the scale of any non-airport related development as suggested at page 101 of your Evidence Paper 3.

Whilst we acknowledge the role of BIA as a gateway and support in principle the ambition to build capacity by growing passenger numbers, we object to the extent of the SEL, as in the absence of an appropriate evidence base, the scale or nature of the proposed complimentary uses could have the potential to adversely impact on the economic growth strategy of our own council area.

Furthermore, you state in paragraph 4.35 of Evidence Paper 3, that the promotion of West Lisburn for mixed use development will have a 'different function' than Belfast International Airport (BIA) and Nutts Corner. It is suggested that these two locations will be attractive to large National and International companies wishing to locate at or close to a global gateway.

Lisburn & Castlereagh City Council do not agree with this conclusion as West Lisburn is located at a strategic road junction with ease of access to BIA and remains as a strategic area of investment for the Council, with a strong regional focus on economic growth. There is therefore no evidence to support the conclusion that West Lisburn will only service a smaller scale local employment need.

The requirements of Consistency Test CE4 (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) are not met.

Connectivity to BIA (pg 110)

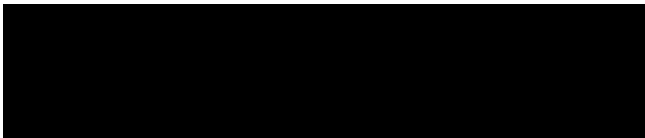
As Northern Ireland's main airport, Lisburn & Castlereagh City Council welcomes that improved accessibility and connectivity has been identified as a priority for future development.

Evidence Paper 3 and Evidence Paper 10 both refer to the fact that the former Department for Regional Development had previously stated that a rail link to the airport would be viable when airport passenger numbers increase to 8 million per annum. The BIA Masterplan estimates this could reach 8 million by 2020 – within the lifetime of your Plan Strategy.

As stated in our response to your Preferred Options Paper, we remain supportive of the protection of this line for future use and have no objection to the growth of passenger numbers at BIA particularly where this has the potential to create a modal shift from the car to the train and offers choice and variety to the residents of Lisburn and Castlereagh. It would be beneficial if your Council could consider a joined-up approach with our own Council to promote enhanced connectivity to the airport including the potential re-opening of the Knockmore railway line.

The above represents our current views according to the position set out in your draft Plan Strategy. I am very conscious and sensitive to the fact that this is a new process for us all and in bringing forward a draft Plan Strategy we continue to develop our learning. This point has been reflected in the Department's approach and guidance which has significantly evolved since the introduction of the legislation. Consequently I am prepared to keep our position under review in relation to your draft Plan Strategy in so far as it impacts on our Council Area.

Yours sincerely



Conor Hughes
Head of Planning and Capital Programme