

Plean Forbartha Áitiúla 2035 **Dréacht-Straitéis an Phlean** **Local Development Plan 2035** **Draft Plan Strategy**

Cross Boundary Working
June 2025



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

Ag freastal ar an Dún agus Ard Mhacha Theas
Serving Down and South Armagh

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1.0 Introduction

- 1.1 In preparing its draft Plan Strategy the Council has a responsibility to ensure that the Plan is not in conflict with the Development Plan Document (DPD) of neighbouring councils and opportunities for co-operation with adjoining local authorities have been explored. These relate to Soundness Tests for consistency and coherence and effectiveness as the Plan Strategy will be tested for soundness in terms of content and the process by which it is prepared.

Background

- 1.2 The Council shares its boundaries with the following five neighbouring Councils (see Appendix A map):
- Ards and North Down Borough Council
 - Armagh City, Banbridge and Craigavon City Council
 - Lisburn and Castlereagh City Council
 - Louth County Council
 - Monaghan County Council
- 1.3 At a regional/national level, co-operation and collaboration on a north-south basis is encouraged in the Regional Development Strategy 2035 (RDS) and the Irish National Planning Framework (Project Ireland 2040). In the RDS, gateways and corridors are recognised for internal and external connectivity, strengthening economic competitiveness across the island of Ireland. In the NPF it is noted that there are significant cross border interactions focused on key settlement networks. This includes the Drogheda-Dundalk-Newry network in the context of the Dublin-Belfast economic corridor. The NPF states that the growth potential associated with these interrelated networks is also important for regional development. It identifies the important relationship north and south under National Policy Objective 44: *'In co-operation with relevant Departments in Northern Ireland, to further support and develop the economic potential of the Dublin-Belfast Corridor and in particular the core Drogheda-Dundalk-Newry network and to promote and enhance its international visibility'*.
- 1.4 At a local level, the Council has a shared landscape with Ards and North Down Borough Council through the Strangford and Lecale Area of Outstanding Natural Beauty and a number of environmental designations associated with Strangford Lough cross-council boundaries. This high-quality coastal landscape with its feature drumlins and islands is an important shared resource for the respective Councils and the region as a whole.

2.0 Policy and Legislative Context

Departmental Guidance

Soundness

- 2.1 Through the Independent Examination process the Council LDP is subject to a series of soundness tests which focus on the LDP content, conformity and the process by which it is produced. There are twelve tests of soundness across three categories, procedural, consistency, coherence and effectiveness although there is a degree of overlap between the tests. In terms of cross boundary engagement the key tests are as follows:
- 2.2 C4 – This asks if the plan has had regard to other relevant plans, policies and strategies relating to the council's district; and
- 2.3 CE1 – This states that the Development Plan Document must set out a coherent strategy from which its policies and allocations flow and where cross boundary issues are relevant it is not in conflict with the Development Plan Document of neighbouring councils.
- 2.4 Development Plan Practice Note 6 'Soundness' (DPPN6) states *"... a council must have regard to other relevant plans, policies and strategies, not only in its own district but also in its adjoining area."*
- 2.5 DPPN6 also states that the council must ensure that its strategies are not in conflict with the DPD of neighbouring councils by assessing any likely cross boundary implications and ensuring that they are compatible with those of its neighbouring councils.
- 2.6 Development Plan Practice Note 7 'The Plan Strategy' (DPPN7) advises that the Plan Strategy should *'identify interdependencies and relationships between places both within and across administrative boundaries'*.
- 2.7 Cross boundary issues have been identified during the preparation of the Plan Strategy, and where possible mutual cooperation and agreement on an aligned approach has been taken forward.

Legislation

- 2.8 Whilst there is no legislative duty to co-operate with neighbouring councils as in England and Wales the Planning Act (NI) 2011 does make reference to the functions of the LDP and cross boundary matters. Under Section 3(4) it stipulates that in keeping under review matters which may affect development of its district a Council may also keep under review and examine matters in a neighbouring district. Section 3(5) then follows on and states that a Council must consult with the council for the neighbouring district in the exercise of its functions under this section.

3.0 Consultation and Engagement with Neighbouring Councils

Working Groups

- 3.1 The Plan team attend a number of working groups, which bring together planning officers from neighbouring authorities and provide an opportunity to discuss common issues and consider opportunities for collaborative working. Discussions with neighbouring authorities have taken place throughout the preparation of the LDP.

Development Plan Working Group

- 3.2 This group entails the Development Plan managers from the 11 Councils and meets on a quarterly basis. This working group is a key forum for sharing information, working practices and where possible, adopting a shared approach in common areas of the plan making process.

Minerals Working Group

- 3.3 The Minerals Working Group membership includes all 11 Councils and was established in June 2018. The Working Group was set up to consider:
- Supply and demand for aggregates across each council and NI as a whole; and
 - Consideration of wider mineral development issues including potential for high value and industrial minerals.
- 3.4 Whilst this has not met for a number of years the Council continues to liaise with the Department for Infrastructure and Department for the Economy and explore the potential for this group to be re-established to address the shared challenges around minerals development across the region.

Cross Border Development Plan Working Group

- 3.5 Council officers from the Plan team attended cross border development plan group meeting up to its last meeting on the 19 December 2020. These meetings were jointly chaired by the Department for Infrastructure (DfI) and the Department of Housing, Planning, Community and Local Government. Similar to the Minerals Working Group the Cross Border Development Plan Working Group has not met for a number of years. Further engagement from central government has been sought by Councils through the Development Plan Working Group to ensure Councils are fully up-to-date on any emerging considerations or findings of DfE.

Spatial Data Working Group (SDWG)

- 3.6 The membership of the SDWG comprises officers with GIS responsibility from each of the 11 Council Development Plan teams. This group was established following the transfer of planning powers and met up to January 2020. It was

suspended between 2020-2024 and was subsequently re-established in January 2025.

3.7 The principle objectives of the SDWG are:

- To co-ordinate the acquisition, creation, sharing and management of spatial data for the Council planning functions (including liaison with LPS and DfI Planning).
- To share best practice and assist in the development of GIS skills.

3.8 Participation in this working group has enabled Councils to share spatial data and address common challenges in the sourcing and acquisition of spatial data.

Tree Forum

3.9 The Tree Forum meets on a quarterly basis and entails tree officers from all 11 councils. Whilst not directly associated with the work of the Development Plan team the work of the Council's tree officer assists with the development of the Council's tree strategy and consideration of additional supplementary planning guidance. Similar to the other working groups the sharing of knowledge through this group helps to align policy approaches to the protection of trees. This group has enabled discussions to take place on collaborative working practices to address the recommendations in the NI Audit Office Report¹

Consideration of LDP Policy Approaches and Potential Cross Boundary Issues with Neighbouring Authorities

Individual engagement on areas of Mutual Interest

3.10 The council met with its neighbouring authorities on an ongoing basis throughout the development of the LDP draft Plan Strategy. The purpose of these meetings was to discuss topic areas that had a cross boundary/border aspect and to discuss the emerging draft policy as it was being formulated in order to consider the potential to adopt a similar policy approach.

Monaghan County Council 19th December 2019

3.11 A face to face meeting took place with Monaghan County Council in the Council offices in Newry and discussion was focused on the following matters:

- The council set out the position in NMDDC in respect of the publication of the Preferred Options Paper and initial policy development for the LDP Plan Strategy. An overview of the work of the Planning team in Monaghan was also provided.

¹ NIAO Strengthening Our roots Report

- There was discussion on the respective approach to flood risk management and water quality. Consideration was given to Lough Ross and the River Fane which cross the boundary of the two Council areas.
- There was general discussion on how the approach to social housing in the south differed from the system of planning in the north. In the Republic of Ireland this is currently largely delivered by local authorities. It was advised that under Part V of the Planning and Development Act 2000 local authorities could obtain up to 10 per cent of land zoned for housing development at “existing use value” rather than at “development value” The approach was to deliver tenure blind schemes with social housing being pepper potted throughout the development.
- Developer contributions were raised and it was highlighted that they were a legal requirement in the Republic of Ireland.
- In relation to transportation it was noted there was potential for more cross-border working to ensure connectivity between the two Council areas, in particular those people working across the border without access to a car as public transport options are limited. There was also discussion on cross-border cycle routes and walking routes.
- In terms of their evidence base and collating information there was discussion on the work of the All Island Research Observatory (AIRO) which merges all island statistics and the International Centre for Local and Regional Development (ICLRD). Data from the ICLRd was considered beneficial as it ties together information across the island.

Ards and North Down Borough Council 16 Jan 2023

- 3.12 The council engaged with ANDBC on a joint approach to the identification of a coastal zone and a common policy approach. An initial virtual meeting was held on 16 January 2023 at which the council outlined its proposed methodology for the identification of a coastal zone and it was agreed that a joint policy approach to the coast would be beneficial. Further discussions with ANDBC were undertaken throughout January and February 2023.

Ards and North Down Borough Council 2nd May 2023

- 3.13 A virtual meeting with ANDBC was held in May 2023 and focused on the following matters:
- Discussion around retail and that both Councils had engaged Nexus to carry out retail studies. Thresholds for Retail Impact Assessment were discussed and there was agreement that both councils were taking a similar approach.
 - Tourism was discussed including the inclusion of a policy for glamping which both councils were including. Discussion was given to short term lets and holiday homes in both districts.

- Discussion was given to active travel and disused transport routes which traverse the two districts including the disused railway line between Comber and Saintfield.
- Discussion was given to the Coast and there was an acknowledgement that previous discussions on policy approach had been useful including the methodology used for defining the undeveloped coast.
- NMD to include policies for Green/Blue Infrastructure, Growing Spaces, and Cemeteries ANDBC have similar but broader policies which cover these areas.
- Renewables and Wind Energy was discussed and the DfI consultation on draft Renewable Energy.

Lisburn and Castlereagh City Council 8th June 2023

3.14 A virtual meeting with LCCC was held in June 2023 and focused on the following matters:

- Discussion on NMDDC proposed settlement hierarchy. The uplifting of Saintfield to a town was discussed and how this might impact on LCCC.
- The district's housing allocation was discussed including the allocation for rural housing. Whilst LCCC queried the size of the allocation for housing in the countryside it was acknowledged that they had a much lower rural housing figure due to the make up of the district being largely urban.
- In respect of rural planning policy LCCC highlighted that they had tightened their infill policy and encouraged NMDDC to look at this approach.
- An overview of the Councils approach to economic development was provided, no issues were raised in respect of this approach by LCCC.
- An overview of the proposed approach to retail was provided including the findings from the Council's retail studies. There was agreement that town centres generally were struggling against a backdrop of online shopping. LCCC did not raise any issues in relation to the retail studies.
- In relation to transportation the Ballynahinch bypass was discussed. This could impact on the volume of traffic passing into LCCC. It was highlighted that there was currently no indication of these scheme moving forward due to funding requirements. Discussion on disused rail lines and greenways. The old Comber to Newcastle line travelled between Ballygowan and Saintfield. Potential for future collaboration was noted.
- LCCC provided an overview of the engagement of consultants to support the development of their open space strategy. The data requirements to underpin this work were highlighted by LCCC and noted by the council.
- The proposed change in approach to minerals development from that set out in the POP was discussed. The council highlighted that the revised approach was considered to be more in line with regional policy and had taken onboard comments received during the POP consultation. No issues were raised in respect of the revised approach.

- An overview of the proposed approach to renewables was provided, the potential for off-shore wind development was highlighted however it was advised that there were issues around the necessary infrastructure, including the capability of the transmission grid to support such development.
- There was an agreed consensus that the NMDDC proposed approach did not appear to be in conflict with that taken by LCCC.

Armagh City, Banbridge and Craigavon Borough Council 3rd August 2023

3.15 A virtual meeting with ACBCBC was held in June 2023 and focused on the following matters:

- Discussion on our respective approaches to environmental designations including heritage assets. At this stage NMDDC proposing to carry forward and revise the extent of Special Countryside Areas. Discussion also covered Site of Local Nature Conservation, Historic Parks and Gardens and potential protection for river corridors.
- Approaches to Areas of Constraint on Mineral Development discussed, no cross-boundary conflict identified at this stage.
- Consideration and discussion of respective retail hierarchies.
- Both Council facing similar issues in terms of the capacity issues with NI Water Treatment Works and supporting network.
- Discussion on proposed respective approaches to housing allocation covering both urban and rural areas.

Armagh City, Banbridge and Craigavon Borough Council 6th September 2024

3.16 The Council engaged with Armagh, Banbridge and Craigavon in September 2024 regarding respective approaches to AONB policy. A virtual meeting was held on the 6 September 2024 and involved sharing of draft policy and consideration of the extent to which there was policy variation. It was considered that there was a consistent approach in respect of the cross boundary AONB policy.

Cross Boundary Group Engagement on LDP Plan Strategy Policy Approach 8th and 9th April 2025

3.17 Following on from these series of individual meetings with neighbouring authorities the Council scheduled group meetings with its northern and southern local authorities. These were held on the 8th and 9th April 2025 and afforded the neighbouring authorities to participate in meaningful and constructive engagement on the proposed policy approach in topic areas under each of the three themes of the LDP draft Plan Strategy document (see Table 1 below)

Table 1: Topic Areas for Cross Boundary Group Engagement

Social Theme	Economic Theme		Environmental Theme
Settlement Hierarchy	Economic Development Strategy	Transport Strategy	Historic Environment Strategy
Housing Strategy	Retail Strategy	Telecommunications and other Utilities Strategy	Natural Environment Strategy
Countryside Strategy	Tourism Strategy	Waste Strategy	Coastal Development Strategy
Open Space Strategy	Minerals Strategy	Renewable Energy Strategy	
		Flood Risk Strategy	

4.0 Adjoining Councils relevant plans, policies and strategies

Lisburn and Castlereagh City Council LDP Plan Strategy 2032

- 4.1 The LDP Plan Strategy 2032, published in September 2023, sets out a spatial growth strategy which aims to:
- Support the growth and regeneration of the city, towns and villages whilst sustaining a living and working countryside and protecting areas that are environmentally sensitive;
 - Provide a settlement hierarchy, define development limits and allocate land for housing growth in accordance with the sequential approach of the RDS;
 - Encourage good design and positive place-making creating places in which people want to live, work, visit and explore;
 - Allocate employment land to provide an adequate and continuous supply, taking account of accessibility to major transport routes and proximity to sustainable locations near large centres of population;
 - Identify, define, and designate land for retailing, recreation, education or community facilities where appropriate;
 - Identify, protect and enhance our historic and natural heritage environment, promote green and blue infrastructure and ecological networks;
 - Accommodate sustainable development in the countryside in accordance with prevailing regional planning policy;
 - Provide key site requirements where required achieve good quality development that is reflective of the context within which it is set;

- Promote, influence and deliver a shift to more sustainable travel modes and integrated land use proposals in accordance with the regional transportation policy, promoting reduced reliance on the private car.

Ards and North Down Borough Council LDP Preferred Options Paper

4.2 The Spatial Growth Strategy of their Preferred Options Paper is set out on page 39 and seeks to:-

- Guide the majority of development, including local housing and employment opportunities, to locations within those large towns that have capacity to accommodate new development that can be well integrated with existing infrastructure, and which serve as accessible centres within the larger rural hinterland;
- Maintain and protect the diversity and quality of our rural area and encourage local development which supports the population and services of local communities; and
- Provide opportunities for appropriate diversification of the rural economy.

Armagh City, Banbridge & Craigavon Borough Council LDP Preferred Options Paper

4.3 The Spatial Growth Strategy is set out in Section 5 of the POP and is focused in three key issues:

- Key Issue SGS 1: Defining a Settlement Hierarchy. The Preferred Option (SGS 1A) seeks to bring forward a new settlement hierarchy through reclassification of existing settlements where appropriate, and to include new settlements/new settlement nodes;
- Key Issue SGS 2: Allocating Housing. Under this key issue the Preferred Option SGS 2A seeks to focus housing growth on the Hubs whilst sustaining rural communities to reflect regional direction; and
- Key Issue SGS 3: Allocating Economic Development Lands. The Preferred Option (SGS 3A) seeks to apportion economic development lands in relation to former Council populations and in addition reflect Craigavon's sub-regional function.

Louth County Council Development Plan 2021-2027

4.4 The Louth County Development Plan, came into effect on the November 2021 and provides an over-arching strategic framework for sustainable development covering a range of issues including settlements, sustainable communities, movement and transport, heritage and climate action.

The Louth Plan notes that at a local level government level cross border cooperation is evident in a Memorandum of Understanding (MOU) Newry, Mourne and Down District Council and Louth County Council. This seeks to support and promote the economic development and competitiveness of the

region. Reference is made to ongoing cross-border projects in the area, these are set in the table below.

Table 2: Cross-Border Projects in Louth

Themes	Projects
Renewable Energy and Green Technology	VARITIES, Action for Biodiversity; Energy efficiency and Micro Generation; Source to Tap; SWELL project
Tourism and Recreation	Carlingford Lough Greenway; Tourism Management; Greenore to Greencastle Ferry; EU_SHAFE
Sustainable Economic Growth and Job Creation	Drogheda/Dundalk/Newry Cross Border Economic Zone, CO INNOVATE
Emergency Planning	Major Emergency Management Service

Dublin – Belfast Economic Corridor

- 4.5 At a regional and sub-regional policy level the National Planning Framework (NPF) and Regional Spatial and Economic Strategies (RSES) highlight the importance of the Dublin-Belfast Economic Corridor in supporting economic growth and maintaining economic competitiveness. The Plan notes that the cross-border links between Drogheda-Dundalk-Newry have been identified as a potential driver for economic Growth and states that it will continue to promote and support economic development along this corridor.
- 4.6 The economic potential of the Drogheda-Dundalk-Newry network is identified in the NPF AND RSES. The Plan highlights that these settlements have the critical mass to compete in the global economy and appeal to higher value segments of the business chain by offering sizeable pools of suitably qualified workers, supporting infrastructure and high quality public and commercial services.
- 4.7 EU structural funds such as INTERREG VA Structural Programme provides funding for cross border projects.

Mourne-Cooley-Gullion Geotourism Project

- 4.8 The Plan references the Mourne-Cooley-Gullion Geotourism Project. The project covers the upland areas of the Mourne Area of Outstanding Natural Beauty and the Ring of Gullion as well as the Cooley peninsula and adjacent areas within County Louth. The project promotes the unique aspects of the region, its geology and the related fields of archaeology, mythology and heritage.
- 4.9 Policy Objective TOU7 then seeks to promote and co-operate with all relevant stakeholders to facilitate the development of the Mourne Cooley Gullion Geotourism Project.

Narrow Water Bridge

- 4.10 The Plan notes that the construction of a bridge between the Cooley Peninsula in County Louth and the southern section of the Mourne Mountains in County Down at Narrow Water would be a project of immense symbolic and historical significance.
- 4.11 Policy Objective TOU19 – To co-operate with the relevant authorities and government agencies north and south of the Border in the provision of the Narrow Water Bridge.

Great Eastern Greenway

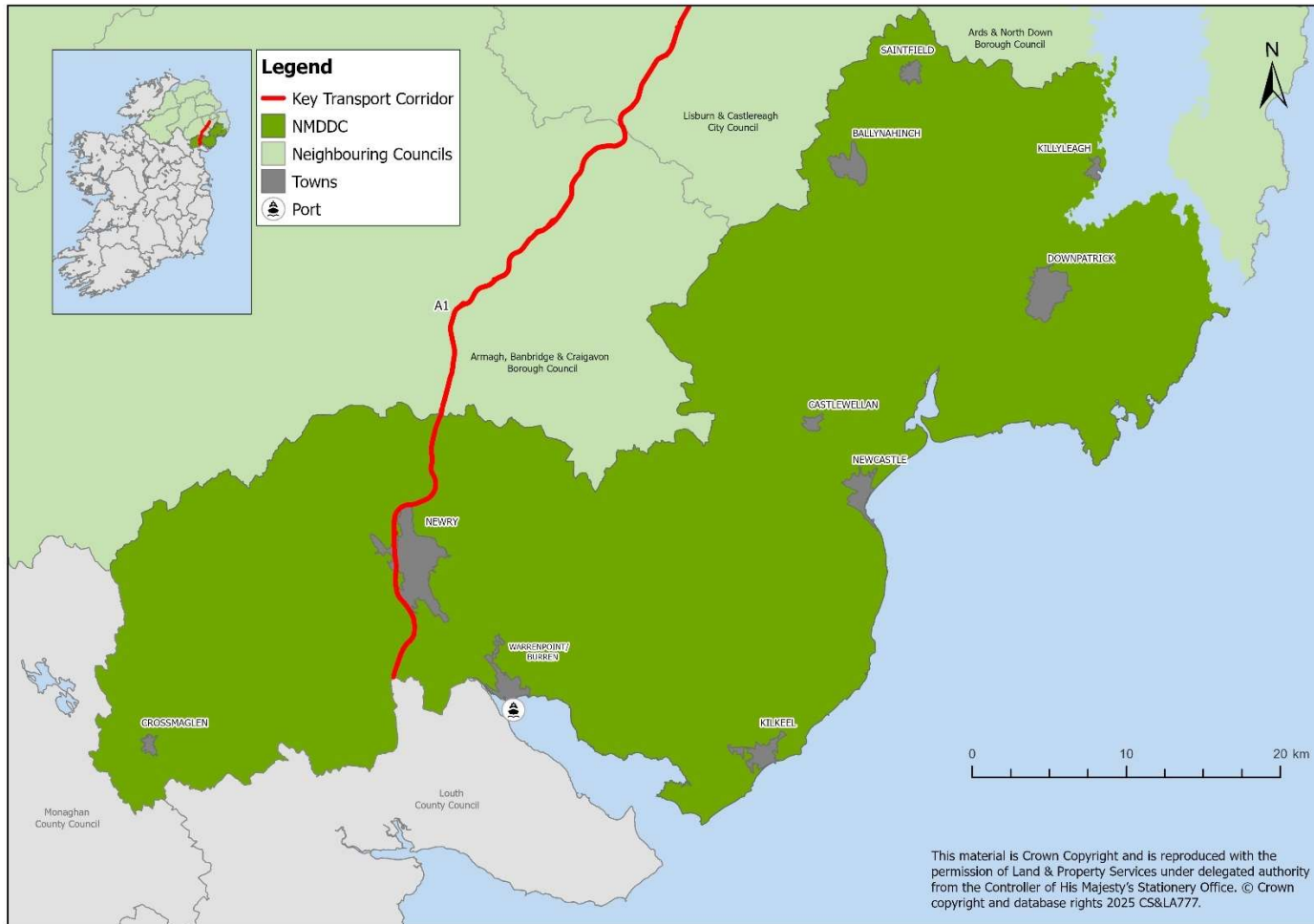
- 4.12 The Council highlights its commitment to continuing to develop and invest in the network of Greenways which it notes are a valuable recreational amenity promoting active and healthy lifestyles and an important tourism asset. With the Plan it is stated that it is proposed to extend this greenway firstly to Newry and then to Dundalk, and this would significantly improve the recreational infrastructure and cross border links along the coastline.
- 4.13 Policy Objective MOV 35 – To continue to engage and work closely with Newry, Mourne and Down District Council and other stakeholders in the development and expansion of the Great Eastern Greenway from Carlingford to Newry.
- 4.14 The focus of the growth strategy for County Louth is as follows:
- Prioritise targeted population and economic growth to the designated RGCs of Drogheda and Dundalk. Promote their continued sustainable and compact growth as regional drivers to city scale, with a target population of 50,000 by 2031.
 - Capitalise on the strategic location of both Drogheda and Dundalk along the Dublin-Belfast Economic Corridor, to drive linkages and synergies between the north and south of Ireland.
 - Support the Self-Sustaining Growth Towns of Ardee and Dunleer, which are regionally important local drivers providing a moderate level of jobs and services for the resident population and surrounding catchments.
 - Support Self Sustaining Towns requiring contained growth, focusing on investment in services, employment and infrastructure whilst balancing housing delivery.
 - Having regard to the viability and vibrancy of small towns and villages, promotion of regeneration and support for local employment whilst offering a viable alternative to single housing in the open countryside.
 - Management of urban generated growth in Rural Areas under urban influence, by ensuring single houses in the open countryside is based on the core consideration of demonstrable economic or social need to live in a rural area.

Monaghan County Development Plan 2025-2031

- 4.15 The Draft Monaghan County Development Plan 2025–2031 was placed on public display from 5th September 2024 to 14th November 2024. The Plan was officially adopted on Monday, 26th May 2025, and it is set to come into effect from 7th July 2025.
- 4.16 The Plan notes that a number of County Monaghan's settlements are located in close proximity to the Northern Ireland border and states that the high level of cross border social and economic interactions that occur between County Monaghan and those counties in Northern Ireland is difficult to quantify.
- 4.17 The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County but also identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.
- 4.18 In terms of housing and population growth the Census 2022 indicated that there was 37.9% of the County's population living in the urban settlements designated as Tier 1-4 settlements in the Monaghan County Development Plan 2019-2025. This Core Strategy sets out to increase that to at least 40% over the plan period in order to assist in the regeneration of the settlements. The Plan suggests that this will be achieved through a number of approaches:
- Focusing on achieving more intense growth in the County town in accordance with the target set out in the NPF and RSES, whilst establishing a hierarchy of settlements capable of providing a range of services and employment to their local populations and hinterlands.
 - Promoting Town Centre First.
 - Pursuing the compact urban growth of towns and villages through the development of lands within the existing urban footprint.
 - Only permitting development in the rural areas which is appropriate to the rural setting, including those which are consistent with agricultural diversification, to support the strengthening of towns and villages and promote sustainable transport patterns.
 - Providing for low density development of residential units on suitable sites within the designated settlements in order to provide an alternative house type choice to rural one-off housing. Recognising environmentally sensitive areas within the County which need to be protected but not precluded from appropriate uses and/or development.
- 4.19 The key area of focus of the economic development strategy is the spatial element of economic activity, and specifically the provision of suitable lands

for economic development in appropriate locations, which have been assessed as being appropriately serviced or have potential to be serviced during the lifetime of the development plan. Given the dominant employment sectors within the county, with a strong engineering, manufacturing and agri-food industry base, it is important that lands are included in locations which are close to transport links and accessible by means of active travel.

Appendix A - Neighbouring Councils Map



Appendix B – Cross Border Development Plan Working Group Meetings

Meeting	Date	Location
Cross Border development Plan Group	13/06/2017	Monaghan
Cross Border development Plan Group	30/11/2017	Derry/Londonderry
Cross Border development Plan Group	29/11/2018	Armagh
Cross Border development Plan Group	30/05/2019	Letterkenny
Cross Border development Plan Group	19/12/2019	Newry

Appendix C - Response to LCCC Consultation on draft Plan Strategy

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 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

Anthony McKay

Chief Planning Officer

Appendix D - Response to LCCC Consultation on DPS Focused Changes

Date: 9 March 2021

Ref: LCCC LDP F&MC 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-Consultation on focussed changes addendum including minor changes schedule -January 2021.

Representation Response of Newry, Mourne and Down District Council

I refer to your consultation received via email on 14th January 2021 in reference to the above and thank you for the opportunity to comment on the proposed changes and the associated documents.

- Consultation on Focussed Changes Addendum including Minor Changes Schedule (January 2021)
- Addendum to Habitats Regulation Assessment (January 2021)
- Sustainability Appraisal Report (January 2021)
- Addendum to Rural Needs Impact Assessment Screening Report (January 2021)
- Addendum to EQIA Screening Report (January 2021)

Each of the documents has been reviewed and NMDDC would make the following comments.

Consultation on Focussed Changes Addendum including Minor Changes Schedule (January 2021)

The preparation of the document identifying focussed changes for public consultation in line with Development Plan Practice Note 10 (DPPN 10) is noted. It is also noted that the document includes minor changes for information in a separate schedule in accordance with paragraph 4.5 of DPPN 10.

The focussed changes are divided into two separate sections relating to Part One: Draft Plan Strategy and Part Two: Operational Policies. The focussed changes to Part One and the accompanying reasons for the changes are noted in each case. Primarily they relate to:

-SP08Housing in Settlements which included the correction of an error in the affordable housing need figures and a change to take account of the updated Housing Growth Figures.

-SP14 Town Centres, Retailing and Other Uses which removes criterion b which related to supporting Sprucefield Regional Shopping Centre in recognition of its regional status in accordance with key site requirements.

SP21 Renewable Energy which included amendments to the Justification and Amplification to note a 'cautious' approach and to take account of the 'wider settings' of Areas of Outstanding Natural Beauty' and recognising these as 'sensitive landscapes'.

The focussed changes to Part Two and the accompanying reasons for the changes are also noted. These changes relate primarily to the wording of the policy and justification and amplification to provide clarity, to align with the SPPS or take account of consultee concerns over a conflict with the Habitats Regulations.

NMDDC have no objection the proposed focussed changes. However, it would make a number of observations.

- Focussed Change FC14B relates to Policy UT1 Utilities. It is noted the document 'Consultation on Focussed Changes Addendum including Minor Changes Schedule' includes an alteration to criterion b to read as 'Avoidance of areas of nature conservation, historic environment or archaeological interest where possible'. However, the screening of FC14B in the documents 'Addendum to Sustainability Appraisal Report' (Appendix A) and 'Addendum to Habitats Regulation Assessment' (Table 1) does not reference the inclusion of this amendment which the Council considers would require assessment given its potential impact.
- FC8A and FC8B relate to Policy MD1. However, the text of FC8B reads as 'scientific of natural or built heritage'. It is considered it should be amended to read as 'scientific, natural or built heritage' to be consistent with FC8A.

Addendum to Habitats Regulation Assessment January 2021

This report notes that all proposed focussed and minor changes were screened to identify whether any would have a likely significant effect on any international sites.

It is noted that following the initial screening exercise ten policies were identified as having a likely significant effect and mitigation measures in the form of six recommended amendments were identified.

It was found that the proposed focussed and minor changes to the draft Plan Strategy document have no likely significant effect on any international sites and for Appropriate Assessment has been screened out in each case.

NMDDC would again refer to FC14B as noted above. Also, whilst it is accepted that the minor changes schedule is provided for information purposes in line with DPPN10 it is noted that MC63 and MC65B in document 'Consultation on Focussed Changes Addendum including Minor Changes Schedule' makes reference to the water body of Portmore Lough however this detail is omitted from table 2 of the 'Addendum to Habitats Regulation Assessment' which shows the application of the Integrity Test following the incorporation of mitigation measures by minor changes which results in an inconsistency.

Reference to MC52E is also omitted from the minor change column of Appendix 2 of 'Addendum to Habitats Regulation Assessment'.

Sustainability Appraisal Report January 2021

It is noted that each of the proposed focussed and minor changes were screened as part of the addendum to the Sustainability Appraisal Report and that it was concluded that none of the changes would 'materially' change what the Sustainability Appraisal initially assessed, or what it assumed about how the LDP would be implemented. It was concluded that the incorporation of the proposed changes in the draft Plan Strategy will have no significant impact on the Plan's performance against the Sustainability Objectives.

As highlighted previously NMDDC would highlight the inconsistency of the wording noted in relation of FC14B as detailed in the Schedule document and appendix A of the Sustainability appraisal report. With the exception of this NMDDC has no further comment to make in relation to the addendum to Sustainability Appraisal Report.

Addendum to Rural Needs Impact Assessment Screening Report (January 2021)

NMDDC note the addendum states it assesses the proposed focussed and minor changes in relation to the Rural Needs Impact Assessment (RNIA) while the findings relate only to the focussed changes as the minor changes were screened out. The focussed changes do not introduce new policy and so no implications on the overall RNIA were identified. NMDDC has no further comment to make in relation to the addendum to Rural Needs Impact Assessment Screening Report.

Addendum to EQIA Screening Report (January 2021)

It is noted the addendum to the Draft Equality Impact Assessment (EQIA) Screening Report assessed the proposed focussed changes in relation to the EQIA process and screened out the minor changes as they were considered to have no impact on the draft EQIA Screening Report. The addendum concludes that as the focussed changes do not introduce new policy the outcomes identified and considered in the

initial EQIA Screening Report remain unchanged. NMDDC has no further comment regarding the addendum to the EQIA Screening Report.

In conclusion, NMDDC considers that the proposed changes to your draft Plan Strategy and associated documents are not in conflict with the ongoing development of our own draft Plan Strategy. We thank you for the opportunity to comment and 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

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