

Historic Environment Division

This submission relates to the Sustainability Appraisal for the Lisburn and Castlereagh City Council Local Development Plan 2032, Draft Plan Strategy, and to evidence papers that touch on historic environment issues.

In relation to SA and SEA, DfC Historic Environment Division (HED) operate via a Service Level Agreement with colleagues in DAERA whereby, we provide comment and advice in relation to matters of Cultural Heritage including archaeological and architectural heritage.

(January 2020)

HED advises that this response should be read alongside our comments in relation to the draft Plan Strategy. Generally, we must commend the Council on their engagement to date and on gathering and articulating the historic environment evidence toward informing plan strategies and policies. We believe that the Sustainability Appraisal overall is a considered assessment of effects in relation to the historic environment, although we would have concerns that scoring policies in groups may mask potential impacts of individual policies in relation to the historic environment. Where we believe that further evidence should be considered or that scoring should be revised, we have indicated this in the narrative below.

HED would highlight that with regard to the Technical Supplement 6 on Countryside assessment and Settlement Appraisal that we consider that further work is required using historic environment evidence toward informing the zoning of sites and appropriate mitigation in a robust manner as the plan moves forward to Local Policies Stage.

Sustainability Appraisal incorporating SEA.

Fig 1. Lisburn and Castlereagh City Council LDP area.

As a general comment with regard to the plan, HED considers that in strategic level mapping of the council area, the line of the Lagan Navigation and canal should be articulated, for the reason that this is a major communication route through the council area, and because of its scale in the landscape and status as a protected site.

3.2.9 SP08 Housing in Settlements

HED considers the scoring outcome envisaged for the historic environment here to be too positive. HED advises that new housing can have a detrimental impact in relation to occupation of older properties and that inappropriately sited new housing can affect the historic character of a settlement. We accept that this latter can be mitigated through well informed zoning which utilises robust landscape character assessment which takes account of historic environment characteristics.

3.2.10 SP09 Housing in the Countryside.

HED advises that we consider the scoring here to be too positive, giving recognition to the fact that there can be impacts on landscape character and the recognition articulated in some of the evidence that a large number of approvals in recent years have been replacement dwellings. Refer to HED comments under 3.3.6.

3.2.19 Strategic Policy 18 Protecting and Enhancing the Historic Environment and Archaeological Remains

HED agrees with the scoring here but advises that, as per our comments on the draft Plan Strategy there is a need for clarity in the policy text which presently contains inaccurate information and inconsistencies in relation to different designations and historic environment records.

3.2.22 Strategic Policy 21 Renewable Energy

HED advises that in considering potential effects on the historic environment there is a focus in the report content on the visual impact. We advise that the impacts of associated below ground infrastructure should be factored in as well as where these impact archaeological remains, the effects will be permanent and irreversible. We consider that an uncertain scoring may be more appropriate.

3.2.23 Strategic Policy 22 Telecommunications and other Utilities

HED disagrees with the assessment of impacts in relation to the historic environment here, which states that the impact of underground construction works is likely to be short term and temporary. We advise that where these works lead to destruction, even through excavation, of archaeological remains the outcome is permanent as opposed to short term. We consider that the scoring in relation to outcomes for the historic environment might be uncertain.

3.2.25 Strategic Policy 24 Flooding

HED welcomes the recognition in scoring that many heritage assets in the council area are located on the flood plain. We were disappointed though that this key aspect of the areas landscape character was not more clearly picked up on in Countryside Assessment.

3.2.26 SMU West Lisburn/Blaris

See our comments in relation to the draft Plan Strategy. We consider that given the scale of greenfield land that will be affected by this zoning, and the presence of the medieval church site, archaeological concerns should be iterated in the amplification text as had been the case with regard to this zoning, as articulated in BMAP. We would presently consider the scoring here to be uncertain in relation to the historic environment. If the suggested text were inserted into amplification this would provide a better assurance in the strategic policy that previously unidentified archaeological remains will be considered appropriately, so that they can be identified, assessed and protected or recorded.

We advise that the consideration of mitigation here should articulate the potential for key site requirements around archaeological evaluation toward identifying previously unidentified archaeological remains so that their character and the impacts of development can be adequately assessed.

3.2.27 SMU Purdysburn/Knockbracken

See our comments in relation to this policy draft Plan Strategy. We would consider that a positive outcome could be better ascertained if there were clear cross references to the policy HE5 in relation to Historic Parks Gardens and Demesnes.

3.3.6 Policy COU1 – Development in the Countryside, Policy COU2 –New Dwellings in Existing Clusters, Policy COU3 – Replacement Dwellings, Policy COU4 – The Conversion and Reuse of Buildings for residential use in the Countryside, Policy COU6 – Personal and Domestic Circumstances, Policy COU7 –Dwellings for Non- Agricultural Business Enterprises, Policy COU8 Infill/Ribbon Development, Policy COU9- Temporary Caravan, and Policy COU 10.

HED advises that the statistics cited in the countryside assessment suggest that replacement dwellings form a high proportion of development in the countryside and that this should be cross referenced into SA. We consider that these figures would imply an impact in relation to historic structures, almost certainly including non-designated heritage assets which are being removed. It is vital to ensure a positive outcome for the historic environment that the policies are used effectively to protect vernacular buildings and historic buildings of local importance as per SPPS 6.24. The report also indicated that one off housing continues to be an issue in relation to landscape character.

3.3.8 COU11 - Farm Diversification, COU12 - Agricultural and Forestry Development, COU13 - A Necessary Community Facility and COU14 - The conversion and re-use of buildings for non-residential use

HED notes that minor positive impacts are identified in respect of maintaining landscape character and protecting and conserving the historic environment in relation to the conversion and re-use of buildings for non-residential use. Potential positive impacts may be achieved upon the identification of vernacular buildings and buildings of local importance and appropriate application of the relevant policies. A more streamlined policy suite may therefore assist Council when assessing change of use applications impacting on such non-designated heritage assets. See comments in relation to the draft Plan Strategy with regard to 'The Conversion and Reuse of Buildings.'

3.7.1 HE1 The Preservation of Archaeological Remains of Regional Importance and their Settings

See our comments in relation to the draft Plan Strategy. As presently articulated we consider that the amplification text in relation to scheduled monument consent is misleading and creates an inference that scheduled monument consent will most likely be granted following discussion, which may not be the case. At present we consider that this wording may lead to confusion and potentially negative outcomes for remains of regional importance and their settings, where development that affects them should only be permitted in exceptional circumstances. We advise that if the wording is removed as per our comments, the outcome should be positive.

3.8.7 Policy TRA 8: Active Travel Networks and Infrastructure Provision.

HED recommends that measures to reduce negative effects and promote positive effects should include cross over with historic environment policies as well as those other policy suites named.

5. Monitoring

Please refer to our comments on monitoring in the draft Plan Strategy. HED advises that we consider that the monitoring indicators in relation to the Historic Environment (Page 140) need to include reference to monitoring of impacts on archaeological remains and their settings as well, in order to provide more robust assessment of impacts on how the plan operates moving forward. To make the Historic Environment Monitoring tests better accord with soundness test **Coherence and Effectiveness tests (CE3)**, HED recommends the inclusion of the following indicators:

- a) Number of planning decisions which go against the advice of HED in relation to impacts on all heritage assets including archaeological remains and their settings.
- b) The number of non-designated heritage assets re-used/enhanced, demolished or replaced.
- c) Number of consultations where evaluations to inform decisions are recommended by HED, but which instead receive approval with planning conditions for archaeological work. Failing to identify some of the potential archaeological impacts in these cases in advance, can result in negative outcomes for the historic environment, and also potentially have financial consequences for developers who may have to deal with complex archaeological sites.

- d) Numbers of scheduled monument consents in relation to development work initiated through the planning process
- e) Monitoring of applications in various AAPs to which archaeological conditions applied;

Appendix 5 How has the SA influenced the draft plan strategy?

Page 401 29 Protecting and Enhancing Built Heritage Assets and Archaeological Remains

HED refers to our comments in relation to the draft Plan Strategy and to the operational policies for the historic environment, most specifically in relation to the soundness of policy HE1. We advise that we consider the current draft plan strategy wording highlighted in our response around scheduled monument consent to be a significant amendment to policy which could, as highlighted above, potentially have negative outcomes in relation to the historic environment. Otherwise we find the operational policies to be generally sound and have welcomed the meaningful engagement with the council.

SA Scoping Report

HED welcome the updating of the scoping report – we have articulated further comment below toward making it and the plan more robust at local policies stage and implementation

Page 39 – Rural Dwellings

HED consider that it would be appropriate to articulate some of the statistical evidence derived from other reports such as the countryside assessment in relation to replacement dwellings, here.

5.5.4 Key Sustainability Issues (Economy and Employment)

In relation to the last bullet point with regard to tourism assets HED advise that it is important that new initiatives to develop their potential further are led by the significance of the asset so that development is sustainable and integrity is protected conserved and enhanced. We consider this to be a key issue in itself.

Page 120 HED note the mention of Lisburn City as a cradle of the Irish Linen Industry. We welcome this but were disappointed that this particular aspect of the council area's heritage, which had associated impacts on landscape, did not receive a fuller consideration in the Countryside Assessments

Page 122 – HED advise that the heading should read **Areas of Significant Archaeological Interest (not Special) and Areas of Archaeological Potential**. We advise that it would be prudent to consider the ASAI for the Giants Ring in the neighbouring Council Area within this evidence and in the map 5.14.1. as policy applications within the council area should take this into account in decision making, demonstrating working with neighbouring councils with regard to the protection, conservation and enhancement of archaeological remains of regional significance.

We welcome the articulation that further AAP will be identified moving forward to local policies stage and ask that our comments in relation to this matter in the draft plan strategy be taken on board to enable flexibility. The last sentence of the final paragraph on this page incorrectly implies that AAP are designated in plans. This should be amended to read

“The new LDP will consider the designation of new ASAI and the identification of AAP through consultation with DfC HED”

Page 123 Defence Heritage

HED advise that the last sentence of this paragraph should be amended to reflect that the Maze contains designated heritage assets of both regional and local importance. (e.g. The former airfield at the Maze is in a fair condition and contains scheduled monuments and listed buildings as well as other locally important heritage assets.

5.14.3 Likely evolution of the Baseline without the Local Development Plan

Please refer to our comments in relation to ASAI and AAP above. The second paragraph of text in this section contains similar inconsistencies to those noted on Page 122. We suggest removing the reference to these in this paragraph as the issue is highlighted correctly in the third paragraph.

5.14.4 Key Sustainability Issues for the Historic Environment and Cultural Heritage

HED advise that given the statistics outlined in the Countryside Assessment, an additional key issue for the historic environment might be the impact of replacement dwellings through the removal of non-designated historic structures.

Technical Supplement 6 Countryside Assessment

HED would advise greater consideration of historic environment matters in this paper and believe that it would strengthen the evidence base, which we consider to be weak without its fuller incorporation. The historic environment is inseparable from the landscape and natural environment in that the landscape in Northern Ireland has largely been shaped by thousands of years of human activity and modification. We consider that enhanced recognition of historic landscape characteristics will be vital at local policies stage, particularly in the context of new zonings. Our comments in relation to this document have read across to the outline of Baseline Evidence in Position Paper 9. Countryside assessment

We recognise that the content of this report in reference to settlements in Appendix 2.0 - Settlement Appraisals, does touch on historic environment issues, but this is unfortunately inconsistent with the wider report. The apparent lack of use of historic environment datasets in relation to the wider rural landscape in Appendix 1 -Landscape Character Review, means that a much more limited picture is produced in terms of analysis of landscape characteristics. As an example we advise that while the Lagan Navigation and canal is occasionally referenced in the report, its impact on landscape character of the area, in terms of its historic impact in facilitating agricultural usage of some parts of the flood plain, and influencing additional route ways and settlement, is not adequately captured. The feature is located there specifically as a result of pre-existing landscape character and then will have affected and created changes to landscape character and augmentation around its course as it was constructed, which are key the council area.

Often the heritage assets of a place are influenced by and have influenced the landscape or naming of the place and recognition of this and these historic environment trends and interactions are what we would expect to be captured through assessment.

We do note that Historic Parks and Gardens are considered under the Biodiversity Profile, rather than historic environment, and note in the table on Page 13 that the data source is listed as the local authority. We would advise that HED are the data source for this information and that it is important to ensure that up to date datasets are utilised, in case boundaries to these landscapes have been updated or augmented in light of new information since BMAP. We would advise that while there is cross over with biodiversity, the historic environment of these designed landscapes is a key consideration.

Part 1

In consideration of Built Heritage on page 18 -22 HED advise that this should really have considered the ASAI in the neighbouring Belfast City Council District, given that this is a landscape designation that could potentially be impacted by policies and decision making in the Lisburn and Castlereagh City Council area. This would be demonstrate cross boundary considerations in line with soundness requirements in C4

HED advise that there is no mention here of Areas of Archaeological Potential or the spatial data that is available in relation to the Gazetteer of Nucleated Historic Urban Settlements. It is disappointing in this context as this data is referred to in other evidence papers

Part 2

As per comments above HED advise of our concern that in reviewing the existing landscape character assessments no usage appears to have been made of our Historic Environment Digital Datasets, which form a key aspect of landscape character and from which trends in relation to the historic landscape can be captured and articulated, even in a general sense for each landscape character area. In reference to the bullet points in section 5.3 we advise that more comprehensive consideration of the historic environment data to update the previous landscape character assessments is vital in reappraising landscape sensitivities and forces for change. We note the biodiversity and geo diversity reviews but consider that the failure to address the need for better articulation of the historic environment in carrying out the review presents an obvious gap that needs to be addressed moving forwards.

The settlement assessments on Page 27 lack detail with regard to historic environment characteristics, - this is inconsistent with the appraisals in Part 4

We welcome the articulation of trends on page 28 and the recognition given that many replacement dwellings are being replaced rather than refurbished. This highlights a sustainability issue in relation to the rural historic environment in the council area which ought to be better captured in SA.

Part 3 Development Pressure Analysis

We note the comments in 6.8 in relation to replacement dwellings and refer to our comments that this may present a key sustainability issue to be considered in relation to the rural historic environment.

Part 4 Settlement Appraisal

HED advise that section 7.2. is inaccurate in reference to Areas of Archaeological Potential. As per the council's scoping report these have been identified from the Gazetteer of Nucleated Historic Urbans Settlements compiled on the basis of research and analysis by HED. (This has read across to 3.26 in position paper 9)

Appendix 1 Landscape Character Review

As per our comments above HED advise of our concern at the lack of consideration afforded to the historic environment in this review. We cannot clear see any clear evidence that our datasets have been utilised. As result of not considering the historic environment enough - key issues relating to it are very rarely considered or identified. Issues that might be identified in certain areas could include for example "the need to preserve the settings of rural heritage assets or particular monuments like hilltop raths etc".

Appendix 2 Settlement Appraisals

The accompanying maps to settlement appraisals suggest that these rely heavily on historic environment evidence that was utilised in the formation of BMAP, and HED would be concerned that some of this evidence may be out of date, and may be out of sync with our current datasets. We advise strongly on the importance of using the up to date datasets in assessment. HED also note no reference to existing Areas of Archaeological Potential in relation to individual settlements where these had been identified previously.

We welcome the articulation of aspects of historic influence in settlement evolution, and the recognition of placename evidence but point out the inconsistency of considering the importance of placenaming only in relation to the urban landscape. HED would advise that if the placename translation information is derived from a source, such as the Northern Ireland Placenames project, this should be appropriately referenced in the report.

Overall HED consider that the assessment could be strengthened if the statistical information on the historic environment resource (and cartographical information from historic ordnance survey maps) were utilised and expanded upon for a clearer articulation of the interaction between heritage assets and their landscape context, toward an enhanced characterisation of landscape and settlement trends, field enclosure etc. This does not have to be at a site specific level but enough to observe historic environment trends.

HED would advise that our guidance provides a sound basis to be used in assessing the setting of prominent or landmark historic environment assets <https://www.communities-ni.gov.uk/publications/guidance-setting-and-historic-environment>. Impact on heritage assets and their settings we consider to be a key issue both in the rural and urban contexts

Position Paper 7: Historic Environment

HED considers this paper to be generally good as an overview of the historic environment of the district in relation to the plan, although we note a number of inaccuracies to references of outdated organisations.

HED therefore recommends the document should be reviewed to reflect the current Departmental and Divisional references as follows:

Historic Environment Division (HED), is a Division within the Department for Communities (DfC).

Foot note 3 of p. 10 to be revised as follows: Historic Environment Division within the Department for Communities, has the responsibility for identifying, recording and protecting our archaeological and built heritage.

The former 'Monuments and Buildings Record' now 'Historic Environment Record of Northern Ireland' (HERoNI) is located Ground Floor, Klondyke Building, Cromac Avenue, Gasworks Business Park, BELFAST.

Northern Ireland Environment Agency (NIEA) is an agency within the Department of Agriculture, Environment and Rural Affairs (DAERA).

HED also considers that a preamble which recognises the wide scope of the historic environment and its intertwined context with landscape, the natural environment and naming of places would help give greater recognition to its impact on the evolution of the council area. Aspects of the historic environment that are important to consider in planning also include undesignated heritage assets such as historic boundaries, including townland and parish boundaries, historic routeways and plantings, previously unidentified archaeological remains and vernacular and other historic structures in the landscape. These, although undesignated, are vital components of historic place and character which the local development plan can help in protecting, conserving and enhancing. Below are a few further comments that we consider will help strengthen the document to inform the local policies stage of plan development.

Archaeological Excavations. It will be prudent as the plan moves toward local policies stage to consider areas where extensive archaeological remains have been encountered through development led archaeological work as a result of planning conditions. In some cases this will have implications for the archaeological potential of adjoining lands which may be considered for zoning. An example would be the areas of Millreagh and Millmount on the eastern outskirts of Dundonald where excavations in advance of development have uncovered extensive evidence of Neolithic and Bronze Age occupation and ritual activity in this wider landscape. Information in relation to excavations that have occurred can be gleaned from the Historic Environment Record of Northern Ireland (formerly the Northern Ireland Monuments and Buildings Record).

HED considers that given the scale of the Lagan Canal, its protected status, and its potential as a strategic tourism asset, that this feature should be highlighted on plan maps for the borough, and recognition should be afforded that as a feature crossing administrative boundaries there may be a need for cross boundary consultation in relation to policy development that might directly affect it. We advise that content in the existing position paper which refers to it as the Ulster Canal, should be amended. The Ulster Canal was a separate waterway running from Charlemonte to connect with the River Finn in County Armagh.

HED advise that Industrial and Defence Heritage assets should be considered as sites of local importance (SPPS 6.9 would apply) as they fall under the definition of a monument articulated in the Historic Monuments and Archaeological Objects (NI) Order 1995. Local Landscape Policy Areas have and can be designated around these features.

Although the Giants Ring ASAI lies in an adjoining councils land, it is nonetheless an important consideration in the formation of planning policy in the Lisburn and Castlereagh City Council area and for this reason ought to be referred to in this paper to articulate recognition of cross boundary issues.

Comments on online mapviewer

HED welcome the use of the ArcGIS map on the plan webpage. We advise that there seems to be confusions with regard to some of the labelling. The SMR is the Sites and Monuments Record (not the Scheduled Monuments Record) -This is an important distinction as this dataset contains all of the monuments which are not designated as scheduled or state care.

We would welcome a wider use of the historic environment datasets in this online resource, articulating aspects such as listed structures, areas of archaeological potential, industrial heritage and so on.



Local Development Plan 2032
Sustainability Appraisal (SA) incorporating
Strategic Environmental Assessment (SEA)

Representation Form

Please complete this representation form online and email to LDP@lisburncastlereagh.gov.uk or alternatively print and post a hardcopy to:-

Local Development Plan Team
Lisburn & Castlereagh City Council
Lagan Valley Island
Lisburn
BT27 4RL

All representations must be received no later than 5pm on the 10th January 2019

SECTION A: DATA PROTECTION

In accordance with the Data Protection Act 2018, Lisburn & Castlereagh City Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure.

It should also be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure (DfI) as they will be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the privacy section at www.lisburncastlereagh.gov.uk/information/privacy

By proceeding and signing this representation you confirm that you have read and understand the privacy notice above and give your consent for Lisburn & Castlereagh City Council to hold your personal data for the purposes outlined.

Please note that when you make a representation (or counter-representation) to the Local Development Plan your personal information (with the exception of personal telephone numbers, signatures, email addresses or sensitive personal data) will be made publicly available on the council's website. Copies of all representations will be provided to DfI and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for Independent Examination. A Programme Officer will also have access to this information during the IE stages of the Plan preparation. DfI, the Programme Officer and the Independent Examiner will, upon receipt, be responsible for the processing of your data in line with prevailing legislation. If you wish to contact the council's Data Protection Officer, please write to:

Data Protection Officer
Lisburn & Castlereagh City Council,
Civic Headquarters,
Lagan Valley Island,
Lisburn,
BT27 4RL

or send an email to: data.protection@lisburncastlereagh.gov.uk or telephone: 028 9244 7300.

SECTION B: YOUR DETAILS

Please tick one of the following:-

- Individual Planning Consultant / Agent Public Sector / Body
 Voluntary / Community Group Other

First Name

Last Name

Details of Organisation / Body

Address

Postcode

Email Address

Phone Number

Consent to Publish Response

Under planning legislation we are required to publish responses received in response to the Plan Strategy, however you may opt to have your response published anonymously should you wish.

Even if you opt for your representation to be published anonymously, we still have a legal duty to share your contact details with the Department for Infrastructure and the Independent Examiner appointed to oversee the examination in public into the soundness of the Plan Strategy. This will be done in accordance with the privacy statement detailed in Section C.

- Please publish *without* my identifying information
 Please publish with only my Organisation
 Please publish with my Name and Organisation

SECTION C: EXPRESSIONS OF OPINION

Please set out your comments on the SA incorporating SEA below:

Overall HED welcome and commend the use of evidence and scoring in relation to the SA. However in relation to some of the policy approaches we have advised where we disagree with the scoring. Our comments should be considered in cross reference to our comments on the draft plan strategy.

In addition we have provided comments in relation to some of the evidence papers which relate to the historic environment in informing the plan. We have very specific concerns around the Countryside Assessment and the review of existing Landscape Character Areas and we ask that our comments on these be taken on board to inform further work as and when the plan moves toward Local Policies Stage. The Historic Environment forms a key component in informing place making and we consider it is vital that the assessment be strengthened in this regard

Our comments on the SA and other evidence papers are provided as a narrative response on the attached documentation

Signature

[Redacted Signature]

Date

9th Jan 2010

Thank you for your comments