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Conor Hughes
Head of Planning and Capital Development
Lisburn & Castlereagh City Council
Civic Headquarters,
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11th September 2023
SEATeam@daera-ni.gov.uk

Dear Mr Hughes,

Re: Formal Consultation with NIEA following Independent Examination of Lisburn & Castlereagh City Council Local Development Plan 2032, draft Plan Strategy.

Thank you for your letter dated 15th August 2023. The Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) has considered the consultation and associated documents and our opinions are set out below.

General Comments

DAERA are broadly content with the SEA assessment and draft HRA. We agree with the conclusion that potential significant effects arising from the implementation of the modifications are already accounted for in the Sustainability Appraisal (SA). We acknowledge that following consideration of the modifications, the Council has concluded that, other than the minor amendments presented in Appendix B, no further amendments to the SA are required.

We are broadly content with the conclusions of the HRA that the Plan Strategy (with the modifications set out in the direction made by the Department for Infrastructure) will not adversely affect the integrity of any international sites, either alone or in combination with other plans and projects.

Natural Environment Division (NED) Comments

Having reviewed the screening matrix of modifications in Schedule 2 NED are content with the conclusions reached regarding the effect on the SA for each modification.

NED are content with the conclusions of the HRA and welcome that the Local Policies Plan (LPP) will be subject to HRA for revised/new policies and land zonings. We welcome that operational policies must not be read in isolation from one another and that policy NH1 will apply to any development that will be brought forward under the adopted Plan Strategy providing sufficient mitigation with regard to Appropriate Assessment and protection for European Designated Sites.

Air Quality Biodiversity Unit Comments

Non-Technical Summary

AQBU welcome sustainability objective SO9 - **Improve air quality:**

“Air pollution has serious impacts on human health as well as degrading the natural environment. This objective can be achieved through reducing sources of air pollution. Where air pollution cannot be totally excluded careful siting of development should avoid impacts on sensitive receptors.”

HRA V2

- AQBU welcomes the inclusion of aerial emission impact assessment within the HRA.
- In Table A.3.1 it is stated “plans that would increase the amount of development” – if this potentially includes additional agricultural/industrial development, it could include these also in the next column.
- Page 12 includes an explanation highlighting potential aerial emissions from traffic (NOx) and livestock developments (ammonia) which contribute to nitrogen deposition on sensitive habitats. Air pollutants (e.g. NOx) can also be produced from other emission sources, such as industrial/energy processes e.g. combustion plants, generators, boilers etc.

The HRA could include a link to APIS ([Air Pollution Information System | Air Pollution Information System \(apis.ac.uk\)](http://Air Pollution Information System | Air Pollution Information System (apis.ac.uk))), which provides information on Critical Levels/Loads, background and exceedance levels.

Please contact the SEA Team at seateam@daera-ni.gov.uk should you have any queries or require clarification.

Yours sincerely,

p.p. *C. Nolan*

Caroline Nolan



Donna Whelan
Senior Scientific Officer
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