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Date: 9th December 2019

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Dear Mr Duffy,

**Re: Mid and East Antrim (M&EA) Borough Council Local Development Plan:
Draft Plan Strategy – Public Consultation.**

I write on behalf of Causeway Coast and Glens Borough Council and in response to your correspondence dated 3rd October 2019, relating to the publication of your Local Development Plan (LDP) Draft Plan Strategy and associated documents.

DRAFT PLAN STRATEGY

Council comments on the policies and proposals contained within the Draft Plan Strategy are attached at Table 1, Appendix 1. In addition to these I wish to make the following comments:

Area of Outstanding Natural Beauty (AONB)

The Antrim Coast and Glens AONB traverses our common boundary. As such, the Council notes the draft policies that apply within the AONB.

Landscapes and Environmental Assets

The Council would highlight that a number of Regional Landscape and Seascape as well as Local Landscape Character Areas traverse our common boundary:

The Council notes that the accompanying Technical Supplement 10: Landscape Character Assessment is primarily based on NILCA 2000 and contains additional information on the cultural, historic and perceptual qualities of the landscape to complement the existing descriptions of the landscape's physical characteristics. It also reflects the extensive research which has been undertaken by other statutory bodies in the past 18 years, since the publication of NILCA 2000.

In particular the Council notes the LCA retains the original boundaries contained within NILCA (2000), whilst its main output is the identification of a number of discreet areas of exceptional or high value landscape (Candidate Sensitive Landscape Areas) which are subject to further analysis.

DRAFT PLAN STRATEGY: SUSTAINABILITY APPRAISAL (INC SEA)

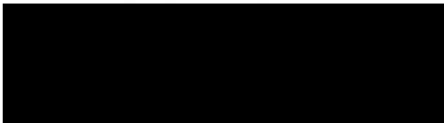
The Council notes the content and findings outlined in this environmental report and the detailed justification of how M&EA has arrived at the suite of policies and proposals contained within this Draft Plan Strategy.

ASSOCIATED REPORTS

The Council also notes the contents and findings outlined in the suite of reports and background papers that accompany this Draft Plan Strategy.

We looking forward to the continuation of our collaborative work as we progress our respective Plans.

Yours faithfully,

A black rectangular box redacting the signature of the Head of Planning.

Head of Planning

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Appendix 1

Table 1: Mid and East Antrim Draft Plan Strategy - Review and Comments

PART 1				
SECTION	PARAGRAPH/TABLE/M AP	POLICY PROPOSAL ALLOCATION	JUSTIFICATION AND AMPLIFICATION	COMMENT
Section 4: Vision and Strategic Objectives				
4.1 Vision				Noted.
4.2 Strategic Objectives				Noted.
Section 5: Spatial Growth Strategy and Countryside Strategy				
	Table 5.1 – ref Causeway Coast and Glens as complimentary to Ballymena. Larne has potential to create a centre for tourism, being located on the Causeway Coastal Route.			Noted.
	Map 5.1 – Cargan, Clough, Martinstown identified as Villages, Glarryford, and Newtowncrommelin identified as Small Settlements. These are			Noted.

	both new small settlements.			
5.3: Strategic Housing Allocation Strategy	5.3.2 – limit urban footprint and brownfield sites to settlements +5000 population.			Noted.
	5.3.5 – use HGI figure as it is based on the best available evidence, largely related to anticipated household formation and no sound reason to depart from it.			Noted.
		SGS3: Strategic Allocation of Housing To Settlements: 4,256 to settlements and 350-400 to the countryside.	5.3.8: The Housing Evaluation Framework has not been applied to Small Settlements.	Noted.
			5.3.10 – note that a different approach is taken in lower tier settlements of villages, small settlements and the countryside. Highlights inability to predict or control the number of single dwellings in the countryside.	Noted
			5.3.15 - Refers to situation where notional housing allocation is already	Noted

			exceeded by existing life permissions.	
			5.3.17 - 20- Proposes phasing of housing land in 3 main towns and Greenisland at LPP stage. Phase 1 – sites with live permissions. Also, sites in the urban footprint – Phase 1. Other Phase 1 – in settlements +5000 population, outside the urban footprint if land required to meet allocation or affordable housing need. Phase 2 – urban fringe. Smaller towns – no phasing.	Noted This may make development in the smaller towns more attractive than in phased sites in the main towns.
		SGS5: Management of Housing Supply – relates to main towns and small towns.		Noted. Policy divided into Main Towns and Greenisland, and Remaining Small Towns, and defined a sequential approach with land phased in the main towns and Greenisland as outlined above. Sites are 0.2 ha or 10 units +.
	5.3.31: land will not be zoned for housing in villages and small settlements. Housing Policy Areas to be identified in villages where it is anticipated most new housing will be			Noted. The Plan has 11 villages, with approximately 10% of the housing allocation attributed to them: 17 small settlements are proposed with 142 units allocated to them. Housing policy areas in line with SPPS approach.

	located. May require amendments to existing limits, to be viewed at LPP.			
5.4 Economic Development Strategy	5.4.3: 'Amplify' initially targeted 2,200 net jobs between 2017-21, given job losses, now expect continued growth to be largely jobless growth. Amplify – M&EA to become NI's leading centre for Advanced Manufacturing and Agri-Food, with capabilities in Tourism, Financial and Business Services, and Digital Technologies.			Noted
	5.4.5: 2 reports commissioned by UUEPC and CBRE (TS 5). UUEPC report positive in need for additional space ³ for small businesses and general office.			Noted
	5.4.8: CBRE report – audit of existing accommodation.			Noted
	5.4.10 & 20: vacant or under-utilized lands last used for economic			Noted. Should this land be within the urban footprint? Was it

	development also contribute to the supply of economic development land.			discounted as possible housing land?
	5.4.17: Small towns are located in proximity to 3 main hubs so land is not zoned in this tier. LLP will facilitate opportunities for appropriate business growth in the small towns.			Small towns nearest CC&GBC are Cullybackey, Broughshane, Aghohill.
5.5 Retail Strategy		SGS7: Retail Hierarchy – provides guidance on range of activities expected in each centre	5.5.8 – opportunities for small scale provision in line with a town centre first approach and of a scale and nature appropriate to the character of a settlement, shall be encouraged where this helps to meet the daily shopping needs of local residents and necessary local services.	What is intended by ‘necessary local services’?
5.6: Tourism Strategy	Table 5.6.5 – references the Causeway Coastal Route as main tourist attraction.	SGS8 – TOZ at Carnfunnock and Magheramorne Quarry.		Noted
	5.7 – Table defining categories for tourism potential: Vulnerable – Sensitive – Opportunity.		5.6.8 – Broad direction on the opportunity areas and areas of constraint across three different categories.	Noted. Some confusion here. No obvious connection linking the categories to the policy.

5.7: Transport Strategy	5.7.1 – The TS is represented by the Local Transport Study prepared by Dfl.			Noted
5.8: Open Space Strategy	5.8.3 – Strives to reflect the aims, objectives and policy approach of the SPPS.			Noted
	5.8.5 – Open space of public value will not fall within the RDS definition of 'brownfield - previously developed sites'.		5.8.8 – Regional greenways designated through Dfl 'Exercise – Explore – Enjoy: A Strategic Plan for Greenways' 2016.	Noted
			5.8.16 Currently fall short of the Fields in Trust (FiT) provision of 2.4 hectares per 1000 population on playing pitches.	Noted.
5.9: Countryside Strategy	5.9.1 – 22% of population live in the open countryside.	CS1 = CTY1 with small alterations. DRC removed and conversion/reuse limited to vernacular.		Noted
		CS2 – SCA: Presumption against all new development. Designation abuts CCGBC.		Noted.

		CS3 – ACHS: Designation abuts CCGBC.		Noted.
		CS5 - ACG AONB NH6 of PPS6 with additional criteria		Noted.
		CS7 = ENV1 LLPA		Noted.
5.10: Land Instability and Coastal Erosion	Insufficient data. Presumption against development in known areas in line with SPPS. Link to GSNI re' partial data.		Places responsibility for safe development on developer/landowner.	GSNI Link does not include NI and is UK mainland only.

PART 2				
SECTION	PARAGRAPH/TABLE/ MAP	POLICY PROPOSAL/ ALLOCATION	JUSTIFICATION AND AMPLIFICATION	COMMENT
Section 6: General Policy for all Development				
				Not general in nature as it refers to development types. Not sure this will avoid repetition (as intended).
Section 7: Sustainable Economic Growth				

	Bullet point 3 on page 121 refers to the protection of strategically important transportation assets and routes including disused transport routes and, where possible, to facilitate enhanced connectivity between M&E A and between the Borough and other centres.			Noted.
	7.1.2 – growth of small business enterprise in key growth sectors is an economic priority.			Noted.
	7.1.4 – pressure for alternative non-industrial/business uses, e.g recreation and leisure, on zoned ED sites.			Noted.
	7.1.6 – in accordance with the SPPS, previously developed land within settlements last used for economic development will normally be identified and protected for such use, where it remains			Is this paragraph in line with earlier references above?

	suitable. Footnote 24 refers to ED uses as Part B uses.			
		Policy ECD1: Economic Development in Settlements		Noted. This policy broadly reflects PPS 4, Policy ED1.
			7.1.12 – Retailing or commercial leisure development will not be permitted on land zoned for economic development uses.	Is this sentence a policy?
		Policy ECD 2: Retention of Economic Development Land		Note that the Zoned Land section is similar to the PPS 4, Policy PED 7. The Unzoned Land in Settlements section is similar to PED 7, however, does not identify the B2, 3 or 4 uses as per the PPS. Criteria b, c, e have been included. Note that the new policy includes ... and there is no market interest in the site following one year of continuous active marketing.
		Policy ECD 3: Development Incompatible with Economic Development Uses		Noted. Broadly the same as PPS 4, Policy PED 8, slight rewording/reordering only.
		Policy ECD4: Economic		Noted. The PPS policies PED 2-6 deal with the countryside,

		<p>Development in the Countryside</p> <p>b) i – there is only a proportionate increase in the site area</p> <p>New offices, call centres, or storage and distribution will not be permitted unless ancillary to the main use. In addition, retailing (unless acceptable under Policy RET 4 Rural Shops and Roadside Facilities) and commercial leisure uses will not be permitted in the countryside.</p>	<p>7.1.24 last sentence reads: Existing enterprises in an urban area will not be permitted to relocate to the countryside.</p> <p>Paragraph 7.1.27 refers to evidence to</p>	<p>along with PPS 21, policies. Generally, references to rural character and appearance, scale, design, integration, historic and architectural interest are removed as covered by other policies.</p> <p>Policy heading is Economic Development in the Countryside. This last paragraph appears to sit under criterion g rather than as a separate aspect. As it relates to the B uses, it perhaps should not include offices and call centres.</p> <p>How is 'established', as in established economic development use, defined?</p> <p>Should the last sentence in 7.1.24 be included in the policy? The small rural start-ups (d) appear to allow uses other than economic development, as indicated in the last sentence in this criterion. The language in associated paragraph 7.1.25 does not seem to tie in with the policy.</p>
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			<p>demonstrate a farm business is active and established.</p> <p>Paragraph 7.1.28 refers to ammonia emissions.</p> <p>Paragraph 7.1.29 refers to call centres, offices in the countryside.</p>	<p>Criteria e and f – is it intended that farm diversification will only be for economic development uses? Paragraph 7.1.26, page 130, refers to tourism uses also. Should agriculture and forestry development be included in an economic development policy, particularly as the footnote on page 122 refers to Class B of the UCO.</p> <p>These are not B uses and would be town centre first uses under the SPPS.</p>
7.2 Retailing and Town Centres		Policy RET 1. a) Edge of centre boundary.	<p>Footnote 27, page 134, repeats the SPPS which is based on the UCO.</p> <p>Paragraph 7.2.16 refers to ease of movement for an edge of centre site – but the policy states 300 m with no such qualification.</p> <p>Paragraph 7.2.17 refers to city centre,</p>	<p>The policy differs from the SPPS. No mention is made of an alternative sequentially preferable site within a proposal's whole catchment.</p> <p>For clarity, it may be worthwhile making it clear that hospitality and tourism uses, for example, may be appropriate also, as may other sui generis activities. May wish to clarify what is meant by businesses – is this B1 uses, or A2, or e.g nail bars/beauty salons for example?</p>

			whereas the policy refers to town centres.	Language in supporting text should reflect the policy.
		Policy RET 2 – RIA thresholds – 750 sqm for Ballymena and Larne, and 500 sqm for Carrickfergus and others. Small towns. Also convenience shops – 100 sqm	<p>Paragraph 7.2.18 – information given on the average unit size in Ballymena and Larne to justify the threshold, and Carrickfergus also.</p> <p>7.2.21 reads – refer to para 6.290 of the SPPS re factors to be addressed in a RIA.</p>	<p>Thresholds noted. Do criteria a & b refer to town centres only, or local centres as well?</p> <p>Small towns - assessment of retail impact is required (relevant main town centre within its catchment) – does this mean the main town centres of Ballymena and Larne, or the small town centre most closely related to the site?</p> <p>Refer to paragraph 6.283 of the SPPS - assessment of retail impact and need. The last sentence of the policy states the RIA should provide a proportionate response to the proposal being sought and should incorporate an assessment of need, impact and the sequential approach.</p> <p>The policy does not state if permission will be granted or refused. The policy does not make it clear that the extensions</p>

				relate where the overall development would exceed 1000 sqm as per the SPPS.
		Policy RET 3 – Retail in Villages, Small Settlements and Local Centres. There is no size limit on this policy. Criterion a) refers to local need, and b refers to in keeping with the scale, nature and design appropriate to the character of the settlement or centre.		This policy is broadly in line with the SPPS, paragraph 6.278. Criterion a) includes extra text – and which helps to sustain local communities. The policy refers to the General Policy and other provisions of the LDP – is this necessary? This could be interpreted as if not mentioned in the policy, is not applicable.
		Policy RET 4 – Rural Shops and Roadside Service Facilities.	Paragraph 7.2.24 cross references to Policy AD 1.	Noted. This policy reworks the SPPS, and takes some of IC15. No acknowledgement of a potential issue in relation to retail facilities in villages and small settlements. How would garden centres be assessed?
7.3: Tourism		TOU1 = TSM8	J&A carried over from TSM8	Noted.
		TOU2 = TSM1 and TOZ's.	Settlement first approach. 7.3.10 Criteria repetition of GP	Noted.

		TOU3 All tourism development; presumption against in SCA's and Vulnerable Areas.		Noted.
		TOU4 = TSM2	J&A carried over from TSM2	Noted.
		TOU5 = TSM3	J&A carried over from TSM3	Noted.
		TOU6 = TSM5	J&A carried over from TSM5	Criterion (c) removed
		TOU7 = TSM6	J&A carried over from TSM6	Criterion (f & g) removed
		TOU8 = TSM4	J&A carried over from TSM4	Noted.
7.4: Minerals Development	7.4.5 Aims reflect SPPS. 7.4.8 This approach needs to be informed by a robust evidence base which is currently lacking...Council regards it a premature to proceed with the designation of MRAs or ACMD, beyond those defined in existing Plan.			ACMD carried over from previous Area Plan abuts the boundary with CCGBC.
		MIN1 is an amalgamation of PSRNI Policies MIN1, 2, 6 and 7.		Noted.
		MIN2 Reflects SPPS and PSRNI MIN4.		Noted.

		MIN3 Reflects SPPS 6.157.		Noted.
		MIN4 Carried over from PSRNI MIN3 and updated re' SPPS.		Noted.
		MIN 5 & 6 carried forward from BMAP.		Noted.
		MIN7 as per SPPS 6.158.		Noted.
		MIN8 Carried over from PSRNI MIN8 and updated re' SPPS 6.167		Noted.
Section 8.0: Building Sustainable Communities				
8.1 – Housing	Opening paragraphs provide policy contexts for urban and countryside housing			This highlights the differing policy between housing in settlements and housing in the countryside.
		Policy HOU 1 – Quality in New Residential Development in Settlements		Insertion of word, safe, in first sentence compared to PPS 7, Policy QD1. Insert at end of sentence – provides adequate public and private open space etc is new. Second paragraph draws on Policy QD2.
		HOU 2 – The conversion or change of use of existing	Paragraph 8.1.20 appears to contradict the policy as it refers to	Noted. The policy is similar to Policy LC2 in the Addendum to PPS 7, other than criterion a) is

		buildings to flats or apartments. Criterion b refers to a minimum of 150 sqm gross.	instances where less than 150 sqm gross may be acceptable.	<p>not included, criterion b) of the new policy includes 'in the case of sub-division of an existing dwelling, and criteria e(and f) are new.</p> <p>The policy is applicable to HMOs however criterion c requires all units to be self-contained.</p> <p>What is the difference between a flat and an apartment?</p>
		Policy HOU 3 – Residential Extensions and Alterations	Paragraph 8.1.23	Noted. The policy requires all criteria to be met however, criterion d may not be, e.g in town centres.
			Paragraph 8.1.29	Noted. Refers to house extensions – does this mean the text is not relevant to flats or apartments – see para 8.1.23. Text reads as it is applicable to all.
		Policy HOU 4 – Protected Town Centre Housing Areas	Paragraph 8.1.31	Noted.
		HOU 5 – Affordable Housing in Settlements. Policy applies to 10 dwellings/0.2 ha site, and is 20% for towns,	Paragraph 8.1.39 refers to a minimum but this is not stated in the policy.	The policy applies to sizes of 10 dwellings or 0.2 ha in main and small towns, and villages and small settlements.

		and 10% for villages and small settlements		Noted. Does the supporting text goes beyond the policy?
		<p>HOU 6 – Housing Mix (Unit Types and Sizes).</p> <p>Policy applies to 25 units/1 ha site or more. Highlights need for smaller homes. Refers to need for variety in smaller schemes to be considered on individual merits. Mix to be negotiated, based on site, context, and local housing need. Apartment schemes of 25 or more requires variety in size.</p>	<p>Paragraph 8.1.44 refers to the appropriate broad housing mix being provided via the up to date housing market analysis, with an ageing population, reducing household size and decline in the number of households with children. Mix and sizes will be influenced by location, site characteristics and local housing need patterns.</p>	<p>Noted. Reflects wording of PPS 12, Policy HS4, with new sentence on smaller homes to meet future housing requirements in M&EA added. Also, second paragraph insert – and the nature of the local housing need.</p>
		<p>HOU 7 – Adaptable and Accessible Homes. Refers to size of parking spaces, wheelchair space, living space and principal window outlook.</p>	<p>Paragraph 8.1.45 refers to Building Regulations which focus on visitors. Policy HOU 7 focuses on occupants, and Lifetime Homes Standards that can be addressed through planning. Policy</p>	<p>New policy approach.</p>

			applies to all new housing units, and gives space requirements.	
		HOU 8 – Travellers' Accommodation		Noted.
	Housing in the Countryside		Paragraph 8.1.50 refers to Spatial Growth Strategy and sustainable development in the open countryside, and later refers to housing growth in the countryside.	Noted
			Paragraph 8.1.51 refers to housing in the countryside (outside settlement limits), and clustering, consolidating and grouping new development, and reuse of previously used buildings or sites with service provision.	Noted
		HOU 9 – Replacement Dwelling (in the countryside) – includes listed dwellings, non-listed	Paragraph 8.1.54 refers to Spatial Proposal CS2 – Special Countryside Areas.	Noted.

		vernacular dwelling, non-residential building, and criteria for all replacement cases. Defines curtilage.		
		HOU 10 – Dwelling on a Farm Business. Opening sentence and criteria a, b different to PPS 21. C i also different.		Noted.
		HOU 11 – Dwelling for Non-Agricultural Business Enterprise		Noted
		HOU 12 – New Dwelling in Existing Clusters		Noted
		HOU 13 – Ribbon/Infill Development – provision applies to a small gap sufficient for one dwelling only.		Noted. Policy differs to CTY 8 in that it relates to one dwelling only. Policy defines substantial and built up frontage.
		HOU 14 – Personal and Domestic Circumstances		Noted. ‘Applicant’ in Policy CTY 6 is changed to ‘an individual or family’. Paragraph 8.1.71 differs from paragraph 5.28 of the PPS.

		HOU 15 – Residential Caravans and Mobile Homes		Noted.
		HOU 16 – Affordable Housing in the Countryside. Refers to 14 dwellings for villages, and 8 dwellings for small settlements. Word, 'Generally', removed from last sentence from PPS.		Noted.
8.2: Open Space, Sport & Leisure		OSL1 as per OS1 of PPS8	Condensed and updated JA	Noted.
		OSL2 & OSL3 New policies for Greenways and New Open Space.		Noted.
		OSL4 carried forward OS2 of PPS8 with some changes.	Carried forward from PPS8 with some changes.	Noted.
		OSL5:Amalgamation of 5 existing PPS 8 policies, OS 3, OS 4, OS 5, OS 6, OS 7 and amended to include new policy direction for Sport and Outdoor		Noted.

		Recreation in Settlements.		
		OSL6 & 7 new policies for Allotments & Cemeteries.		Could be amalgamated with OSL3 and new part of 5.
8.3 Education, Health, Community and Cultural Facilities				This policy applies to residential care homes and nursing homes as well.
Section 9.0: Transportation Infrastructure and Connectivity.				
9.1 Transportation	9.1.3 A26 Key Transport Corridor to north, Coleraine and Derry.			Noted.
		TR1 carried over from PPS 3 - AMP2.	Largely carried over from PPS 3	AMP1 from PPS 3 is covered by GP Policy.
		TR2 carried over from PPS 3 – AMP3 with some changes.		Noted.
		TR3 similar to AMP 4 with additional element on developer contributions in the delivery of transport schemes.		Noted.
		TR4 Carried over from AMP5, updated to reflect SPPS re' tourism and nature conservation use.		Noted.

		TR5 carried over from AMP8 and updated to include pedestrian.		Noted.
		TR6 carried over from AMP7.		Reference to “areas of parking restraint” removed, covered under GP1.
		TR7 is an amalgamation of AMP 9, 10 & 11.		Noted.
9.2 Flood Risk and Drainage		FRD1 carried over from FLD1	Carried over from PPS 15.	Noted.
		FRD2 carried over from FLD2 extended to include presumption against development over culvert.	Carried over from PPS 15.	Noted.
		FRD3 carried over from FLD3.	Carried over from PPS15 but shortened.	Noted.
		FRD4 – new policy on SuDS.		Noted.
		FRD5 carried over from FLD4		Noted.
		FRD6 carried over from FLD5	Carried over from PPS15 but shortened.	Noted.
9.3 Renewable Energy		Policy RE1 – Renewable Energy Development. Opening section is on renewable energy generally, with separate sections on		Policy differs significantly from the existing policy. Policy applicable outside of Special Countryside Areas. Note the cautious approach.

		wind and ground mounted solar photovoltaic with additional criteria. Large scale solar farms are not permitted in the Antrim Coast and Glens AONB or Areas of Constraint on High Structures.		<p>How is the weight of economic and social benefits determined?</p> <p>Policy appears to rule out renewable energy in SCAs.</p> <p>Paragraph 9.3.11 - mitigation ... and compensatory measures for consideration. Does this mean that no application would be refused on the basis of adverse impacts?</p> <p>Paragraph 9.3.12 - What is larger scale?</p>
9.4 Telecoms and Overhead Cables		TOC1 amalgamates TEL1 from PPS10 with PSU11 from PSRNI.		Noted.
9.5: Water and Wastewater (Sewerage) Infrastructure		WWI1 – Development Relying on Mon-Mains Wastewater Infrastructure		Noted. Policy is slightly different to CTY 16 in its wording and order.
9.6: Waste Management		WMT1: Environmental Impact of a Waste Management Facility		Noted.
		WMT2: Waste Collection and Treatment Facilities		Noted. How does this policy sit with AD plants? They are referred to in the supporting paragraph 9.6.16. The PPS has

				much more detailed text. The Draft PS references the circular economy.
		Policy WMT 3: Waste Disposal Sites		Noted. Policy largely reflects PPS 11, WM 3.
		Policy WMT 4: Development in the Vicinity of a Waste Management Facility		Noted.
		Policy WMT5: Land Improvement	Paragraph 9.6.35 refers to a proposed maximum of up to 2m generally unless there are exceptional circumstances.	Very largely PPS 11, WM 4 with its supporting text.
Section 10: Stewardship of our Built Environment and Creating Places				
10.1 Historic Environment	10.1.8 Article 4 directions to restrict PD rights within particular areas. (CA's)	HE1 amalgamation of BH 1 – 4 of PPS6.	J&A updated re' ASAI's.	BH5 (WHS) Not carried forward.
		HE2 carried forward from BH6 with additional criteria.		Noted.
		HE3 amalgamation of BH7 and BH8 with additional criteria.		BH9 carried over to AD1
		HE4 carried over from BH10 with		Noted.

		additional criteria re' evidence.		
		HE5 carried over from BH11 with additional criteria re' key public views.		Noted.
		HE6 amalgamation of BH12 & 14.		BH13 carried over to AD1
		HE7 amalgamation of ATC1 & 2		ATC3 carried over to AD1
		HE8 carried over from BH15 with amendment.		Noted.
		HE9 carried over from ED1 of PPS 23		Noted.
10.2 Advertisements		Policy AD 1: The Control of Advertisements. Set out as All Adverts, Adverts and Heritage Assets, and Digital Advertising Screens.	Paragraph 10.2.3 recognises the growth in digital signage.	Noted.
10.3 Place Making	10.3.4 Policy aims embrace the approach taken in the SPPS.			Noted.
	10.3.5 The policy aims will be delivered primarily through the strategic policy set out in this section and designation of Strategic Focus Area's (SFA) at LPP.			This does not appear to be a strategic policy.

		SFA1 Strategic Focus Areas – Strategic policy for areas to be designated at LPP.		Noted.
Section 11: Safeguarding our Natural Environment				
11.1 Natural Heritage		NAT1 Carried over from NH1 of PPS2.	Carried over from PPS2.	Noted.
		NAT2 Carried over from NH2.	Update re SPPS.	Noted.
		NAT3 Carried over from NH3.	Updated MNC's with MNR's.	Noted.
		NAT4 Carried over from NH4.	Additional detail on local sites.	Noted.
		NAT5 Carried over from NH5 with the addition of "trees and woodland".	Updated re' Biodiversity Strategy and Checklist.	Noted.