



Preferred Options Paper

Local Development Plan

Public Consultation Report

November 2017

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**Mid & East
Antrim**
Borough Council



**Mid & East
Antrim**
Borough Council

Executive Summary

Mid and East Antrim Borough Council is preparing a new Local Development Plan (LDP) to provide a planning framework that will guide and manage development across the Borough up to the year 2030. The LDP will set out the policies and proposals for the use, development and protection of land in the Council area which, under the new 'planned' system, will be the primary consideration in decision making on planning applications through the development management process. The LDP policies and proposals will reflect its vision and strategic objectives, which in turn have been shaped by a number of factors; but particularly by the aspirations of Council's Community Plan and by the regional imperative to deliver sustainable development that will make economic growth possible, meet the needs of the community, and help to protect our unique environment.

The Preferred Options Paper (POP) provided the basis for consulting on the proposed vision and strategic objectives for the LDP, along with a series of 36 key strategic issues, a number of high level approaches, and a review of operational planning policies. The main purpose of this was to add to our existing evidence base, thereby helping to guide and inform the preparation of the Plan Strategy, which is the next phase of work on the LDP.

This Report details the process involved in preparing and conducting the consultation on the POP, as well as the findings of the consultation. It provides a summary of the feedback received through the representations and the

comments of statutory consultees. It is not intended to be a comprehensive report on every comment received, but rather a summary of the key issues raised in the responses. The Report also outlines our initial Consideration of the key issues raised in the responses.

Following the three introductory chapters of the Report, Chapters 4 to 11 reflect the structure of the POP. The Executive Summary below therefore relates to each of these chapters. The focus of the Executive Summary is on 'headline' statistics emerging from the responses. For more information on the underlying issues emerging from the responses, together with the Council's consideration, it is advisable to refer to the relevant section in the body of the Report.

CHAPTER 4: Vision, Strategic Objectives, Overarching Principles, Developer Contributions

- Approximately 90% of public respondents¹ were generally supportive of the stated Vision for the LDP and statutory consultees were also broadly supportive.
- Almost three quarters of public respondents were generally supportive of the proposed Strategic Objectives for the LDP. Around one half of statutory consultees who commented were generally supportive of all the Objectives, whilst others only chose to comment on specific Objectives.
- Some 82% of public respondents were generally supportive of the six Overarching Principles

proposed for the LDP. While statutory consultees raised some issues, none were deemed to be unsupportive.

- Just over half of public respondents were generally supportive of our Preferred Option in regard to Developer Contributions. However, a significant proportion (41% of those responding on this issue) were deemed to be unsupportive. There was more comprehensive support from statutory consultees, albeit that some raised specific issues of concern.

CHAPTER 5: Spatial Growth Strategy (including settlement hierarchy and supporting sectoral strategies)

- Some 58% of public respondents were generally supportive of our Preferred Option for a new four tier Settlement Hierarchy and around one quarter deemed to be unsupportive. Statutory consultees broadly welcomed the commitment to align the new hierarchy with the RDS direction and to address inconsistencies across the three legacy Council areas in regard to settlement hierarchy. However, a number of specific issues were raised.
- Approximately 60% of public respondents supported our proposed Spatial Growth Strategy, while statutory consultees were also largely supportive.
- Some 53% of public respondents were generally supportive of our Preferred Option for the broad spatial

distribution of new housing growth through the LDP. However, just over one third of public respondents were deemed to be unsupportive. The two statutory consultees who responded were broadly supportive but raised some specific matters for further consideration. Some public respondents thought that the main issue was the Housing Growth Indicator (HGI) for MEA, rather than its spatial allocation and this was reflected in their significant perception (46%) that insufficient land is currently zoned for housing.

- Almost three quarters of public respondents were generally supportive of our suggested approach to developing the LDP Economic Development Strategy. There was also broad support from statutory consultees, albeit that some had specific caveats and concerns.
- Approximately 71% of public respondents supported our proposed five tier retail hierarchy and the role of each tier in regard to retail and related uses. This support was mirrored to a slightly lesser extent (61% support) for our Preferred Option to align the retail hierarchy with the proposed settlement hierarchy while making provision for district and/or local centres. Statutory consultees were generally supportive. While there was support for the designation of district and local centres, this was caveated by the need to ensure they met local needs whilst avoiding harmful impacts on established town centres.

¹ In all cases percentage figures for public responses relate to the actual number of respondents to any given issue rather than the total number of respondents to the consultation.



CHAPTER 6: Sustainable Economic Growth

- Two-thirds of public respondents supported our Preferred Option for the location of Class B1 Business Uses as part of a sequential approach including town centres, district and local centres and economic development zonings as potential locations. Statutory consultees were also broadly supportive of the flexibility enshrined in this approach.
- Two-thirds of public respondents supported our Preferred Option for the location of start-up and grow-on business space which included within economic development zonings and redundant land or buildings last used for economic development within settlements. Again, this was generally supported by statutory consultees.
- In regard to alternative uses on land zoned for economic development, some 58% of public respondents supported our Preferred Option, which offered limited additional flexibility (for example for car showrooms and waste management facilities). However, a sizeable proportion (29%) were deemed to be unsupportive, some raising concerns about compatibility between uses. Whilst statutory consultees were not opposed, approximately half who responded were non-committal.
- In regard to retailing and town centres, some 71% of public respondents supported our Preferred Option to define a primary retail core in some or all town centres along with associated policy to promote and protect retail use at ground floor level, coupled with the designation of specific sites

within the town centre for mixed use development. Statutory consultees welcomed this approach, recognising its aim to promote appropriate diversity of uses within town centres while supporting the core retail function.

- There was very strong support (86% of public respondents) for our Preferred Option which involved facilitating residential and office uses with town centres through various mechanisms. Statutory consultees were also generally supportive, particularly in regard to the promotion of residential use over shops (LOTS).
- There was very strong support (87% of public respondents) for our Preferred Option in accommodating tourism development through the LDP which included tailoring the approach to suit the special characteristics of areas identified as being 'vulnerable', 'sensitive', or 'offering opportunity'. Statutory consultees were generally supportive of the approach although some commented on the suggested classification of some of the locations identified in the POP.
- In regard to minerals development, there was very strong public support for our Preferred Option which involved a 'twin-track' approach of designating Mineral Reserve Areas to safeguard important mineral resources (84% support), while designating Areas Of Constraint to safeguard key environmental/landscape assets (90% support). Statutory consultees were also broadly supportive of the Preferred Option although some raised additional specific matters that ought to be addressed in the LDP.

- Some 92% of public respondents supported our Preferred Option for safeguarding against potential subsidence and land instability. This was backed by statutory consultees, some of whom welcomed the acknowledgement of subsidence associated with abandoned mine workings as a particular issue of importance within the Borough.

CHAPTER 7: Building Sustainable Communities

- Just over half of public respondents supported our Preferred Option to facilitate social and affordable housing through a combination of zoning specific sites for these purposes and providing for a proportion of general housing zonings to be delivered for social/affordable housing in areas of identified need. However, just over one third of public respondents were deemed to be unsupportive. Statutory consultees were in general supportive, although NIHE seemed to favour an alternative option involving a requirement for social/affordable housing on all housing sites over certain threshold sizes, irrespective of local needs. Views of statutory consultees on the potential use of developer contributions to assist in the delivery of social/affordable housing were mixed.
- An overwhelming 96% of public respondents supported our Preferred Option to meet the needs of people with mobility difficulties through utilisation and adaptation of ground floor apartments. Statutory consultees also welcomed this approach in principle although specific matters were raised

which will require further consideration.

- In regard to outdoor sport provision through playing pitches, just over three-quarters of public respondents supported our preferred approach to delivery based on Council's assessment of need, rather than on prescribed general standards. This approach was also generally accepted by statutory consultees subject to the proviso that it is supported by a robust evidence base.
- In regard to community growing spaces and allotments, some 82% of public respondents supported our Preferred Option for this to be provided for through the LDP in appropriate locations, such as those readily accessible by walking or cycling. Statutory consultees were also supportive.
- Some 93% of public respondents agreed that the LDP should facilitate the development of a network of community greenways pathways. This view was reflected by statutory consultees, some of whom also stressed the importance of protecting existing linear open spaces such as former railway lines.
- In regard to play park provision for children, some 54% of public respondents supported our Preferred Option to make provision for equipped play areas in accordance with existing operational policy, except where otherwise specified through key site requirements attached to new housing zonings. However, a substantial proportion of 46% of public respondents were opposed, with some of the alternative options being favoured and a number of additional comments submitted

for consideration. Responses from statutory consultees were supportive of the principle of provision for children's play space but overall were non-committal in regard to the Preferred Option.

- In regard to provision of open space in new residential developments, almost two-thirds of public respondents supported our Preferred Option to make provision in accordance with existing operational policy, except where otherwise specified through an amended list of general exceptions, or otherwise specified through key site requirements attached to new housing zonings. One third of public respondents were deemed to be unsupportive of the Preferred Option. Half of the statutory consultee respondents were supportive of our Preferred Option while the other half were non-committal.
- There was strong support (85% of public respondents) for our preferred approach to the delivery of new or extended health, education, community and cultural facilities which is based on ensuring that the locations of such facilities encourage active travel and promote sustainable development. Statutory consultees were also supportive and some referred to the potential of developer contributions to assist in delivery.

CHAPTER 8: Transportation, Infrastructure and Connectivity

- In regard to sustainable transport and active travel, some 88% of public respondents supported our Preferred Option to provide policy for sustainable transport in new development as well as

encouraging the provision of more park and ride facilities to reduce reliance on the private car. This support was echoed by statutory consultees, with some suggesting that the focus be widened to ensure all aspects of sustainable transport are promoted through the LDP.

- Whilst the POP did not offer a Preferred Option in relation to the potential designation of Areas of Car Parking Restraint in Main Towns, opinions of the public respondents on this matter were evenly split. Statutory consultees were somewhat more supportive for the concept of designating such areas in order to reduce private car usage, encourage active travel, and assist in place shaping in main towns.
- In regard to the key issue of whether to continue to protect certain non-strategic road schemes (as designated in existing area Plans); some 68% of public respondents supported our Preferred Option to only afford ongoing protection through the LDP where such schemes are justified by DfI through a Local Transport Strategy. The Preferred Option was backed by the Department.
- In regard to facilitating renewable energy developments, some 60% of public respondents supported our Preferred Option to retain existing operational policy but to adopt a more cautious approach within designated landscapes, such as the Antrim Coast and Glens AONB. However, a significant 30% of public respondents were also deemed to be unsupportive, with many preferring the alternative option based on a more proactive plan-led approach focused on protecting designated landscapes (or

highly sensitive areas therein) from such development. Statutory consultees were also divided on this issue.

- An overwhelming 95% of public respondents supported our Preferred Option to promote sustainable drainage systems (SuDS) through the LDP. Statutory consultees were also supportive of the preferred option as a proactive measure to manage and mitigate flood risk as well as providing other environmental benefits.
- Cemetery provision was identified as a key issue for MEA by the POP, and some 88% of public respondents supported our Preferred Option that the LDP should provide for this through setting out criteria based policy and also through safeguarding specific locations where there is a firm commitment for a new cemetery or an extension to an existing facility. Subject to a number of caveats, the Preferred Option was also widely supported by statutory consultees.

CHAPTER 9: Stewardship of Built Environment & Creating Places

- In regard to protecting our regionally significant archaeological site at Knockdhu (and other Areas of Significant Archaeological Interest that may be designated in the future) our Preferred Option was to retain current operational policy but reinforce this with the designation of areas of constraint for specific types of development considered as harmful to the asset. This was supported by 70% of public respondents and by all but one of the statutory consultees who responded.

- An overwhelming 91% of public respondents supported our Preferred Option for the greater use of Article 4 Directions to remove certain permitted development rights within those parts of conservation areas that have been identified as still retaining their local character and distinctiveness. All statutory consultees who responded on this issue were supportive of the Preferred Option.
- There was strong support (91% of public respondents) for our Preferred Option to safeguard non-designated heritage assets through strategic policy linked to the identification of such assets through creation of a local heritage list. Statutory consultees who responded also welcomed the approach. That said, some concerns were raised that this approach may only serve to add another layer of uncertainty and subjectivity to decision making.
- Our suggested approach in the POP to place shaping, involving as a preliminary step the identification of Strategic Focus Areas, was supported by 81% of public respondents and by statutory consultees. A number of locations within the Borough were also suggested as candidate Strategic Focus Areas.

CHAPTER 10: Protecting and Accessing our Natural Environment

- In regard to the Southern Glens Coast, some 85% of respondents supported our Preferred Option to retain the existing Special countryside Area (SCA) designation and to consider potential spatial and policy amendments through the LDP. Most statutory consultees who responded were also supportive of the Preferred Option.
- In regard to the Islandmagee Peninsula and Gobbins Coast, all public respondents supported the Preferred Option. However, some respondents also recognised the important strategic role of Islandmagee in meeting regional energy needs. Most statutory consultees who responded were also supportive of the Preferred Option.
- In regard to the Belfast Lough Shoreline (falling within MEA), some 91% of public respondents supported our Preferred Option to retain the existing Belfast Metropolitan Area (BMA) Coastal Policy Area designation which seeks to carefully manage development along this stretch of the coastline. The Preferred Option also made provision for spatial and policy amendments through the LDP if considered appropriate. Most statutory consultees who responded were also supportive of the Preferred Option.
- In regard to Lough Beg and the Lower River Bann Corridor, 95% of public respondents supported our Preferred Option to provide increased policy protection through the LDP for the most scenic and environmentally important parts of this area. Statutory consultees whilst generally supportive, stressed the need for joined up working between Councils bordering on the Lough Neagh/Lough Beg/ River Bann environs.
- In regard to the Antrim Coast and Glens AONB, some 92% of public respondents supported our Preferred Option to provide increased policy protection through the LDP to protect exceptional landscapes and areas therein which are considered to be sensitive to particular types of development.

Statutory consultees were also generally supportive, some highlighting particular areas within the AONB that would benefit from protective policies, while others cautioned that remaining areas within the AONB could be rendered more vulnerable to development pressures through a piecemeal approach. Wind energy respondents were opposed to the Preferred Option.

- In regard to existing Areas of High Scenic Value designated in the Carrickfergus area through BMAP, 96% of public respondents supported our Preferred Option to retain these designations and associated policy, while considering new designations elsewhere in the Borough linked to Areas of Scenic Quality. Most statutory consultees who responded were supportive of the Preferred Option.
- In regard to existing Local Landscape Policy Areas designated in the Carrickfergus area through BMAP, all public respondents supported our Preferred Option to retain these designations and associated policy, while considering new designations elsewhere in the Borough. Most statutory consultees who responded were supportive of the Preferred Option, recognising the value of these designations in safeguarding heritage assets within settlements as well as securing other social and environmental benefits for local communities.
- In regard to existing Landscape Wedges designated in the Carrickfergus area through BMAP, 91% of public respondents supported our Preferred Option to retain these designations and associated policy, while considering new designations elsewhere in the

Borough. Those statutory consultees who responded were also supportive of the Preferred Option, recognising the value of rural landscape wedges in retaining visual separation between settlements and thereby assisting them to maintain their distinctive identities.

CHAPTER 11: Existing Planning Policy Review

In regard to the existing Planning Policy Review set out in Chapter 11 of the POP, the main points raised through the consultation and the Council's consideration is dealt with in Chapter 11 of this Consultation Report. This has been accommodated by including an additional column to the original Policy Review table. Given the number of operational policies it is not possible to consolidate the main points raised and our consideration of these in this Executive Summary and readers are therefore referred to Chapter 11 of the Report.

In regard to Council's consideration, it is not the purpose of this Report to draft any amended policy details or to formulate new policy, as this properly falls within the scope of the emerging Plan Strategy. Rather, this Report sets out Council's proposed '*direction of travel*' in regard to the review of operational planning policy at this point in time, having given due consideration to the POP and the consultation on it.



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1.0

Introduction

The Preferred Options Paper (POP) is the first formal stage in the preparation of Mid and East Antrim Borough Council's new Local Development Plan (LDP). The POP is a public consultation document and was published on 14 June 2017 for a period of 12 weeks, ending on 6 September 2017.

The main purpose of the POP is to raise public awareness and stimulate debate on a range of strategic planning issues relevant to Mid and East Antrim, with a view to helping to inform the Plan Strategy, which is the next phase of work on the LDP. The POP sets out 36 key strategic planning issues that were identified as being relevant to the Borough.

These issues emerged primarily through:

- the emerging evidence base, as detailed in a series of topic based papers (accessible on the Council website);
- a series of meetings with key consultees and Council officials; and
- the priorities identified in our Community and Corporate Plans.

The main purpose of the POP is to stimulate public awareness and Council accepts that there may be other strategic planning issues. However, part of the purpose of the consultation is to identify such issues.

For most of the identified issues, the POP set out several alternative options or approaches that might be adopted and further refined in the emerging Plan Strategy. In doing this, the POP set out Council's "preferred option" and the rationale for this. In addition, the POP posed a number of questions, many of which sought public views on operational planning policy matters. This is because the LDP Plan Strategy is required to address such policies, as currently contained in a suite of Planning Policy Statements published by central government.

A number of assessments required by planning legislation were published in tandem with the POP. These included a Sustainability Appraisal (SA) Scoping and Interim Report and an Equality Impact Interim Screening Progress Report.

The consultation on the POP and associated documents resulted in a total of 118 responses from members of the public and stakeholder groups. In addition, comments were received from 14 statutory consultees, mainly government departments and agencies.

For the purposes of this report, non-statutory consultees and non-Departmental public bodies such as Invest NI and Translink have been treated as public responses.

This Preferred Options Paper Public Consultation Report provides a summary of the key issues raised in these consultation responses and also sets out the Council's consideration in this regard. In preparing this Report, the Council is ensuring compliance with Regulation 11(4) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, which, in regard to public consultation on the POP, states: 'A Council must take account of any representations made in accordance with paragraph (2) before it prepares a development plan document'.

Preparation of the Report is also in line with a commitment made in our Statement of Community Involvement published in August 2016.



2.0

Scope and Purpose of the POP Public Consultation Report

This Public Consultation Report is structured so as to incorporate the following main elements:

- Explanation of the consultation process;
- A summary of the responses (public and consultee) to each of the 36 key issues contained in chapters 4 to 10 of the POP;
- A summary of the responses (public and consultee) to the Planning Policy Review contained in chapter 11 of the POP;
- A summary of the responses (public and consultee) to the Sustainability Appraisal Scoping and Interim Reports; and
- Council's consideration of the summary of responses as referred to in bullet points 2, 3 and 4 above. The Report is a summary of the key issues raised and the initial consideration of these. It is not intended to capture every single item raised in the representations received in relation to the POP.

The preparation and publication of the Public Consultation Report will serve three fundamental purposes. Firstly, it will demonstrate that the main points raised by respondents and consultees, have been recorded, summarised and considered, thereby justifying the consultation as a helpful and worthwhile exercise.

Secondly, it will assist in demonstrating the 'soundness' of the LDP, a matter that Council will be required to address when the Plan is subject to Independent Examination later in the process.

Finally, the Report will add to the emerging evidence base for the LDP, and in particular will help to inform the preparation of the draft Plan Strategy.

As indicated in our Statement of Community Involvement, a written record will be taken of where Elected Members take differing views to that recommended in the Report, along with the rationale for that view. This will also be taken into account in formulating the draft Plan Strategy.



3.0

Consultation Process

Publicity

Public Engagement Events

Dealing with Responses

Approach to Analysis of Responses



Publicity

The Preferred Options Paper (POP) was subject to a 12 week period of public consultation, which is the maximum period allowed for in planning legislation. The main actions undertaken as part of the consultation process are set out below.

Advertisement (Public Notice and Press Release) A public notice in regard to the POP was placed in three local weekly newspapers¹ for three consecutive weeks, beginning on the week commencing 5 June 2017. This notice included broad details in regard to the scope and purpose of the POP, referred to the key supporting documents published concurrently with the POP, stated the dates of the consultation period, provided details of the availability of the document and how to respond to the consultation and set out the schedule for public engagement events over the consultation period. This advertising cycle was repeated in the last two weeks of August. In addition an advertisement was placed in the weekly paper (Newtownabbey Times) of the neighbouring Council district in the week commencing 19 June. A copy of the public notice is provide in Appendix A.

A press release and photograph covering the launch was issued on 14 June and was picked up widely by the local press. This also covered the matters referred to in the newspaper public notice.

Other Editorial Coverage

The POP was also advertised in June in the Borough's 'Connections' magazine which is issued to every household on a quarterly basis. This was

accompanied by a full page article on the POP. An article concerning the POP was also published in the summer edition of the Agenda NI magazine.

Council Website

Notice of the publication of the POP was posted on the Council's website on 13 June. The website provided general information on the POP together with links to the Paper and all supporting documents. Details of the public engagement events were also provided on the website.

Social Media

The Council's Communications department conducted an extensive social media campaign (involving Facebook and Twitter) throughout the consultation period, in an effort to generate maximum publicity on the POP and, in particular, to target younger age groups. As part of this campaign, social media focused at different times on different subject matter encompassed within the POP – for example housing, economic development, town centres and the natural environment.

Targeted Letters

A letter was issued on 14 June to a wide range of organisations and individuals to inform of the publication of the POP and associated documents; along with details as to availability, scheduled public engagement events, and how to respond. Such groups were generally included within the following categories:

- Statutory Consultees;
- Other Key Consultees;
- Political Representatives (MPs, MLAs, Elected Members);
- Business Groups (including top employers in Mid and East Antrim);
- Environmental Groups

- Professional Bodies;
- Academic Institutions (third level);
- Section 75 Groups;
- Community Planning (Community Panel);
- Planning Agents; and
- Individuals previously registered on LDP Community Involvement register.

Public Engagement Events

Consultation Launch Event The launch event was held on 14 June in The Braid, Ballymena. This event was attended by 49 people, including Elected Members, Council officials, representatives from adjoining Councils, statutory consultees, and key stakeholders. Copies of the POP and Summary document were available at the launch and everyone was provided with a postcard setting out details of public events scheduled over the consultation period.

Public Engagement Events

There were nine public engagement events held over the public consultation period. These included six 'public events' held in the three main towns and three 'drop-in sessions' held in smaller settlements across the Borough. Details are shown in Appendix B.

At all these events pop-up posters relating to themes covered by different chapters of the POP were on display. In addition, display boards were set up to show maps and other material relevant to the POP. Development Plan staff were present at all events to answer questions and to provide hard copies of the POP documents upon request. The six public events also included a presentation of the POP which covered its scope and purpose, its context within the overall Plan process, a chapter by chapter review of the document, details of how to respond, and explanation of 'next steps'.

A total of 120 persons attended these public engagement events, with attendance at single events ranging from a minimum of 9 to a maximum of 28 persons.

Planning Agents Event

An engagement event was also held for planning agents on 27 June, at County Hall, Ballymena. This was run along similar lines as the public events described above, but with additional emphasis placed upon the strategic nature of the POP and the importance of submitting representations to reflect this. This event was attended by 12 persons.

Dealing with Responses

Collation of Responses

In an effort to focus responses towards particular key issues and questions set out in the POP, respondents were encouraged to use one of two alternative options for response to the POP (and Sustainability Appraisal), as follows:

- By online surevey, set up by CiviQ (consultation software provider) and accessed through Council's website;
- By a questionnaire response form, also available through Council's website, and returnable by email or by post.

Some respondents chose not to use either of these questionnaire survey options, preferring to submit comments in their own format.

Table 3.1 below provides a summary of the responses received to the POP and the Sustainability Appraisal.

Acknowledgement of Responses All responses were acknowledged by letters which were issued on 21 September 2017.

Table 3.1: Summary of responses received to POP and Sustainability Appraisal

Preferred Options Paper Responses:

Origin of Response	Nature of Response	Number of Responses	Total Number of Responses
Statutory Consultees	Online Consultation	1	14
	Hard Copy or Email	13	
Members of the Public/Agents	Online Consultation	21	118
	Hard Copy or Email	97	

*1 late statutory response received, not included in the analysis.

Sustainability Appraisal Responses:

Origin of Response	Nature of Response	Number of Responses	Total Number of Responses
Statutory Consultees	Online Consultation	2	3
	Hard Copy or Email	1	
Members of the Public/Agents	Online Consultation	3	3
	Hard Copy or Email	0	

¹ Ballymena Guardian, Larne Times, Carrickfergus Times

Approach to Analysis of Responses (in regard to POP Key Issues 1-36)

The CiviQ software has been used to analyse the responses received. As the majority of responses were submitted via email, these plus hard copy responses, were imported on to CiviQ before commencing the analysis. Responses were allocated to the appropriate key Issue as set out in the POP.

The questionnaire survey for most preferred options asked respondents whether they supported the preferred option or one of the alternative options, with space provided for supplementary comment. Where the POP proposed only one approach (as for example with the proposed Spatial Growth Strategy), the questionnaire survey invited a response of 'yes' or 'no', again with space provided for supplementary comment.

For the purposes of this report, all public responses have been categorised according to whether they:

- Are generally supportive of the preferred option or suggested approach;
- Are generally unsupportive of the preferred option or suggested approach; or
- Provide mixed or neutral views or are non-committal.

This overriding information is shown in diagrammatic form at the outset of the consideration of responses in regard to each of the key issues in the POP.

This enables readers to quickly gauge the strength of the public response to the Council's preferred option or suggested approach on any given issue. This is then followed by an examination of the main points raised within the above three categories.

Within each key issue, separate analysis is provided for public responses and statutory consultee responses. It was not considered appropriate to quantify and categorise responses from statutory consultees in the same manner as described above for the public responses, hence the analysis focuses more on the most substantive comments made by consultee bodies, in regard to any given key issue (1 to 36). A full list of statutory consultation bodies and indication of whether or not they responded to the consultation is provided in Appendix C.

The analysis under each key issue is concluded by setting out our Consideration. In some instances, the Consideration provides an indication of how Council is minded to progress policy development and/or strategic proposals in formulating the draft Plan Strategy, taking account of the POP consultation responses and other aspects of the evidence base as it exists at this point in time. However, it needs to be emphasised that evidence gathering is an ongoing process which could ultimately result in a change in policy direction. Accordingly, the Consideration as outlined in this Report should not be treated as being binding. In other circumstances, because of the nature of some of the issues

raised in the consultation responses, further investigation (for example with statutory consultees) is deemed to be necessary. In such instances, this is made clear in the Consideration.

Approach to Analysis of Responses (in regard to POP Policy Review – Chapter 11)

Chapter 11 of the POP contained a review of the full suite of Planning Policy Statements (PPS) in the form of a table. With regard to each PPS, column 1 of the Table provided the title of the operational policy and summarised its nature and intent. Column 2 then set out how the corresponding policy was dealt with by the Strategic Planning Policy Statement (SPPS) and highlighted in particular any change in policy direction or emphasis. Column 3 (Comment) set out the broad recommendations of Council as to how each PPS policy is likely to be addressed in moving forward with developing the draft Plan Strategy.

This table is replicated in this Report with an additional column (Responses and Post Consultation Consideration) inserted to highlight the main issues arising from public responses to the policy related questions in the POP and the Council's consideration of the responses². Again this will not be binding on future decision making.

Approach to Analysis of Responses (in regard to Sustainability Appraisal)

Six specific responses were received to the Sustainability Appraisal (SA)

Scoping and Interim reports that were published for public consultation along with the POP. In addition, issues concerning the SA were included in 45 of the responses to the POP, with all but three of these responses submitted as a standard letter.

The questionnaire response form relating to the SA contained six questions in total³. Five of these questions were specific 'Do you agree' type, with provision made for additional comments. Question six sought any further comments.

For the purposes of this Report, public responses concerning the SA have been amalgamated and categorised according to whether they:

- Are generally supportive of the SA;
- Are generally unsupportive of the SA; or
- Provide mixed or neutral views or are non-committal.

Two statutory consultees (DAERA and Department for Communities Historic Environment Division) commented in detail on the SA. The analysis distinguishes their comments from the general public comments.

This section of the Report concludes with Council's overall consideration in regard to comments on the SA.



² Consideration in regard to Consultation responses will be shown in red

³ A seventh question asked respondents if they would be submitting supporting documents

4.0

Local Development Plan

Vision

Strategic Objectives

Overarching Principles

Developer Contributions

Given the close inter-relationship between the two Plans, our vision for the LDP is based on the Community Plan vision, in that it aspires to improve the quality of life for everyone. However, it is adapted to place special emphasis on the particular place-making role of the LDP.

Our proposed Overarching Principles are primarily guided by our Strategic Objectives and by the five core planning principles in the SPSS. They promote sustainable development and healthy, safe and inclusive communities, key themes in our Community Plan.

Our proposed Strategic Objectives relate to the Community Plan as follows:

Social objectives

Most Related Community Plan

Themes:

- Improving Health and Wellbeing
- Improving Community Safety and Cohesion

Economic objectives

Most Related Community

Plan Theme:

- Sustainable Jobs and Tourism

Environmental objectives

Most Related Community

Plan Themes:

- Our Environment
- Good Health and Wellbeing



Vision

We asked

Do you agree with our Vision for the LDP?

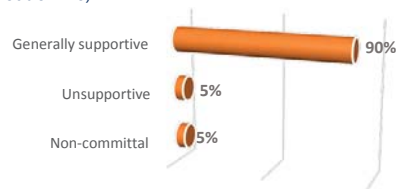
The vision for the LDP is:

"Mid and East Antrim will be shaped by high quality, sustainable and connected places for people to live, work, enjoy, invest and visit, so as to improve the quality of life for all."

Your response

Public responses

(Response rate: 34% - 41 out of 118)



- 90% of respondents supported the LDP vision. Respondents who supported stated:
 - The LDP vision was co-ordinated with the Community Plan and founded on the three pillars of sustainable development.
- Concerns were raised over the ability to monitor and measure the LDP vision statement to ensure that the vision is being achieved.
- Several respondents suggested that the vision statement could be shortened to make it clearer and more memorable.
- Some respondents felt that the introduction of a mission statement or the inclusion of words such as 'resilient' would be beneficial.

Statutory Consultee responses

- Statutory consultees were broadly supportive of the LDP vision.
- Respondents welcomed the close relationship between the LDP and the Community Plan and supported the distinctive place making role of the LDP Vision.
- DfI suggested that the vision could be further refined to make it more locally distinct through reference to the future vision for key settlements or unique assets within the district.
- HED highlighted that the vision failed to acknowledge the Historic Environment in the Borough.

Our consideration

- We welcome the support given to our vision, together with the constructive criticism and suggestions. Whilst we will give further consideration to all comments received, we consider that 'a vision' by its nature cannot be too narrowly focused or prescriptive. We believe that the alignment with the Community Plan vision and the slant on creating 'good places' is entirely appropriate and fundamental to what the LDP seeks to deliver in broad terms.

Strategic Objectives

We proposed

32 strategic objectives to assist in the delivery of the complementary visions of the Community Plan and the Local Development Plan. The strategic objectives encompass the three 'pillars' of sustainable development which embrace economic, social and environmental priorities.

Your response

Public responses

(Response rate: 42% - 49 out of 118)



- Majority consensus for the LDP Strategic Objectives with 74% of participants in agreement.
- Respondents welcomed the wide ranging objectives and noted that the themes were interrelated and in accordance with the principles of Sustainable Development.
- Others felt that the objectives should be more ambitious.
- Several respondents suggested that Economic Objective B and Social Objective D should quantify the number of jobs and homes which will be created over the Plan period in order to ensure that suitable land capacity is identified.
- Others felt that a stronger approach towards the protection and enhancement of the built and natural environment, with a particular emphasis on biodiversity was required.
- RSPB expanded on this by suggesting that ecosystem services should be incorporated into the LDP overarching objectives and that the objectives relating to mitigating and adapting to climate change should be strengthened.
- Another broad theme which emerged from the comments focused on the rural setting.
- Respondents recognised the need for development in the countryside but placed particular emphasis on ensuring that communities and the natural environment were protected from 'inappropriate development.'
- Some objectives were considered to contradict each other – e.g. Economic Objectives H and K relating to tourism and renewable energy respectively.
- It was noted that the objectives were silent in relation to Larne Port gateway and its future growth potential.

Statutory Consultee responses

- Half of respondents were supportive of the LDP Strategic Objectives, whilst others only commented on a specific objective whilst not committing to supporting them all.
- DfI considered the objectives demonstrated the link between the Community Plan and the LDP and appreciated the acknowledgement of the RDS and SPPS. The balance, classification and equal weighting of the objectives was also welcomed.
- DfI advised to reduce the number of objectives to be more concise, spatially focused and ensure they can be implemented and monitored. DfI also suggested including Larne Port Gateway and its potential to grow within objective.
- NIHE considered Social Objective D should be amended to refer to mixed tenure and that Social Objective E should specifically mention affordable housing, wheelchair standard, supported and traveller housing.
- HED requested that the words 'protect' and 'historic environment' are included in Environmental Objective D.
- NIEA desired to see the Water Framework Directive (WFD) water quality objectives explicitly referred to within the objectives.

Our consideration

- We welcome the strong support for the LDP Strategic Objectives.
- We will give consideration to all comments received, particularly in regard to ensuring compatibility between objectives, the level of detail, and their deliverability through the LDP.
- We will consider if objectives should be more spatially focused and in particular will assess if a specific objective relating to Larne Port and Gateway is appropriate.
- We will review the Environmental Objectives and engage further with relevant consultees on this aspect.

Overarching Principles

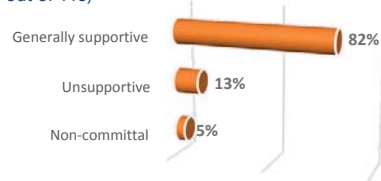
We proposed

6 overarching principles to set out general criteria that all development proposals must have regard to. These overarching principles will seek to promote sustainable development and high quality design.

Your response

Public responses

(Response rate: 33% - 39 out of 118)



- The majority of respondents were generally supportive of the Overarching Principles.
- Some issues raised for consideration included:
 - It was suggested that regard should be had to economic growth, particularly as this is a component of sustainable development.
- One respondent stated that there should be a reference to the importance of the coast, maritime area and ports/harbours.
- In reference to the impacts of traffic congestion, it was suggested that regard should be had to the intention to reduce dependency on, and thereby travel by, the private car.
- Some comments raised the issue of design standards and the need to accommodate flexible solutions, particularly those which have an emphasis on sustainability.
- One respondent stated that the Overarching Principles overlap with the SPPS and LDP strategic objectives and may, therefore, be superfluous.

Statutory Consultee responses

- Statutory consultees were generally supportive of the Overarching Principles. None of the statutory consultees were unsupportive of the Overarching Principles.
- Supportive comments included:
 - NIHE expressed support for a high quality design approach which promotes accessibility, energy efficiency, and reduced reliance on the private car, and promotion of shared housing and access to public spaces.
- Some comments raised issues for consideration:
 - HED stressed the importance of considering the "historic environment" and the evolution of a settlement, as these are central to promoting legibility and a quality public realm.
 - DfI and ABO NI Ltd stressed that the Strategic Objectives and Overarching Principles should be consistent.
 - DfI queried how the Overarching Principles complement/add value to the SPPS Core Planning
- Principles, and indicated it would be useful to clarify the relationship between the Overarching Principles and Strategic Objectives.
- ABO NI Ltd suggest the Overarching Principles should reference "combating climate change" and should give increased weight to the environmental benefits of renewable energy schemes. They request that the Council takes a proactive approach to tackling climate change in accordance with the COP21 Paris Agreement.

Our consideration

- We welcome the strong support given to our proposed Overarching Principles.
- We will give further consideration to all comments received, particularly in regard to the relationship between the Strategic Objectives and Overarching Principles.
- We will consider if economic growth and development and mitigation of the impacts of climate change, including reducing reliance on the private car, should be either integrated within the Overarching Principles or added to them.
- We will engage with DfI with a view to establishing if the Overarching Principles do complement/add value to the Core Planning Principles set out in the SPPS.

Key Issue 1 Developer Contributions



Our Preferred Option

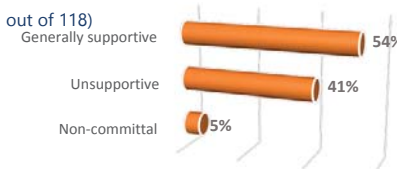
To provide strategic policy on developer contributions through the Local Development Plan.

Our alternative options included seeking developer contributions for sites zoned for housing and/or economic development or negotiate contributions on a site-by-site basis or alternatively do not seek developer contributions under any circumstances.

Your response

Public responses

(Response rate: 35% - 41 out of 118)



- 54% of respondents were generally supportive of the preferred option. They stated:
 - The preferred option provided a long-term stable policy for businesses and economic investment.
 - Invest NI appreciated developer contributions in respect of private sector developments, but cautioned for public sector developments where wider societal benefits are the driving force rather than profit.
 - Important that LDP highlights the infrastructure required from developers. Policy should be based on the infrastructure requirements generated as a result of future development and include costs of delivering infrastructure and the viability of development sites.
 - If developer contribution level unreasonable, then developer will reduce the design style, quality and energy performance to cover any additional costs.
- Developer investment should not be left to the housing and economic sectors only.
- Contributions should be considered on a case by case basis and consideration given to the impact on other businesses that might be impacted.
- Developers must pay for their own infrastructure works and where appropriate, provide public enhancements.
- Difficulties highlighted in tailoring policy to specific sectors or types of development which have differing commercial basis.
- A general approach to this can be problematic as site conditions /situations vary. There must always be some form of negotiations with the developer on a site by site basis.
- Concern over the use of thresholds which could be circumvented by developers. Preferred a hybrid of options 1(a) and 1(c) to address this.
- Others suggested a combination of options 1(a) and 1(b), where a strategic policy is developed for the entire Borough, augmented with specific developer contributions for zoned sites.
- Retail NI preferred KSRs which took account of any localised infrastructure inadequacies or specific circumstances. Thought standardised thresholds will result in a potential imbalance of contributions, which will potentially inhibit investment, negatively impact on infrastructure and quality of the environment.
- Some respondents highlighted the lack of evidential base for needing a strategic policy on developer contributions.

Statutory Consultee responses

- All but one statutory consultee supported the preferred option.
- NIHE added that they strongly support the introduction of a policy to provide affordable housing by way of developer contributions.
- DfI Planning welcomed a strategic policy on developer contributions. However, they highlighted previous research carried out in 2016 which indicated that most housing markets in NI could not, at that time, sustain a scheme of developer contributions toward affordable housing.
- DfI Roads highlighted difficulties determining size of any developer contribution and ensuring developers do not avoid thresholds.
- DfI WDPD welcomed that developer contributions can relate to sewerage connections.
- NIEA added it will be important that the policy should include scope for contributions to secure environmental benefits, e.g. management of green infrastructure areas or areas of compensatory habitat creation.
- HED highlighted opportunities for the promotion and interpretation of the historic environment, but requested further clarification on archaeological investigation or mitigation costs.
- However, SSE felt more information was needed on a policy for developer contributions and a separate detailed consultation should take place.

Our consideration

- Given the significant proportion of unsupportive public responses to the preferred option, and taking account of some of the concerns raised by the public and several statutory consultees, we consider that this key issue needs to be further investigated with DfI and other consultees and stakeholders, before being progressed further.

5.0

Spatial Growth Strategy

Potential Spatial Growth Strategy
and Settlement Hierarchy

Housing Allocation Strategy

Economic Development Strategy

Retail Strategy

The Spatial Growth Strategy will broadly consider the appropriate amount of housing, employment and commercial development over the plan period and where it should be directed.



Key Issue 2 Settlement Hierarchy



Our Preferred Option

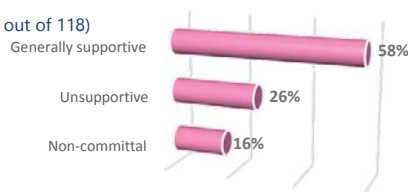
To adopt a new settlement hierarchy, through re-classification of existing settlements, addition of new settlements and de-designation of selected small settlements. This would mean a new four-tier hierarchy that identifies three main towns, six small towns, 10 villages and 17 small settlements.

Our alternative options were to retain the settlement hierarchy within existing area plans or amend the existing settlement hierarchy by re-classifying a number of settlements and adding new settlements.

Your response

Public responses

(Response rate: 36% - 43 out of 118)



- The majority of respondents supported the preferred option.
- Comments focused mainly on:
 - Methodology used for the proposed settlement hierarchy;
 - Support for the position in the hierarchy of individual settlements, including four new small towns, particularly from those offering land to support growth;
 - Comparison of settlements that remain villages with the four new small towns;
 - Support for retaining all existing small settlements i.e. opposition to any proposed de-designation.
- Comments on settlement hierarchy methodology included:
 - NISRA settlement bands should be used e.g.:
 - > Band C: Large Town, population greater than 18,000 people;
 - > Band D: Medium Town, population between 10,000 and 18,000 people;
 - > Band E: Small Town, population between 5,000 and 9,999 people
 - > Band F: Intermediate Settlements, population between 2,500 and 4,999 people;
 - > Band G: Village, population between 1,000 and 2,499 people;
 - > Band H: Open Countryside and small villages with population less than 1,000 people.
 - Consider a 5th tier for large towns over 5,000;
 - Classification should be based only on population size; and
 - Reclassification should be through community consensus.
- Proposals for individual settlements included:
 - Kells/Connor (village) should be comparable to Cullybackey (elevated to small town);
 - Carnlough (village) should be elevated to a small town as it has a larger population than Portlengone (elevated to small town); and
 - Gleno (small settlement) should be considered as a village.

Statutory Consultee responses

- The majority of statutory consultees that responded were non-committal in relation to the proposed settlement hierarchy.
- Most welcomed the commitment to align the new hierarchy with the RDS and to address the inconsistencies across the three legacy Councils, however a number of concerns were raised.
- DfI had concern regarding:
 - the proposed re-classification of the villages to small towns as their populations fall short of the NISRA definition of a small town. The suggested re-classification of Portlengone is of particular concern.
 - that no sustainability assessment has been carried out for proposed new small settlements.
 - that identification of further new small settlements may not support RDS objective to grow hubs and cluster of hubs, advising that the SPDS already allows for rural residential development opportunities.
- NIHE expressed concern that de-designating some smaller settlements along with the aim to reduce housing in the open countryside (which they do support) may not sustain some existing rural communities.

Our consideration

- We welcome the public support for our proposed settlement hierarchy and note the comments on the settlement hierarchy methodology.
- We also note DfI's specific concerns and will further discuss our methodology, particularly in regard to small towns, villages and small settlements with DfI before confirming the approach to be adopted in preparing the draft Plan Strategy.

Key Issue 3 Spatial Growth Strategy

Our proposed Spatial Growth Strategy

Focus major population growth and economic development in the three main towns of Ballymena, Carrickfergus and Larne, strengthening their roles as the prime locations for business, retail, housing, administration, leisure and cultural facilities within the Borough.

Facilitate appropriate growth in our small towns to provide opportunities for business, retail, housing and services.

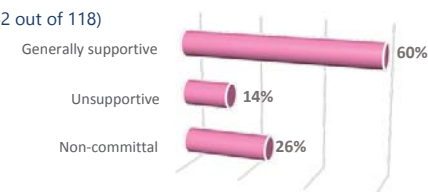
Sustain rural communities living in and around villages and small settlements.

Facilitate sustainable development in the open countryside, balancing the need to protect the environment and rural character while sustaining a strong and vibrant rural community.

Your response

Public responses

(Response rate: 36% - 42 out of 118)



- Whilst respondents were largely supportive of our proposed Spatial Growth Strategy the following was suggested:
 - Main roads between Larne to Ballymena and Larne to Carrickfergus should be designated as link corridors;
 - Villages should be more than merely sustained and given appropriate growth, Carnlough singled out;
 - Greater priority should be placed on protecting the environment
- and rural character than facilitating sustainable development; and
 - Major employment locations should be at strategic locations, near transport intersections.
- Concerns were raised about growth in rural areas, for example:
 - terms such as, "Facilitate appropriate growth in our small towns" and "Facilitate sustainable development in the open countryside..." will be used as justification to grant approvals beyond what is envisioned in the growth strategy.
- it is not sustainable to permit the same level of growth that has occurred since publication of PPS 21. Development in the countryside should be limited to that related to agriculture, food and drink and sustaining rural jobs and services.
- In contrast one respondent felt that more opportunities for appropriate small businesses were required in small settlements and the countryside.
- Statutory consultees were largely supportive of the proposed Spatial Growth Strategy, although DfI noted that no alternative growth scenarios were put forward and Council should satisfy itself that all realistic alternatives have been explored.
- DfI Water and Drainage Policy Division (WDPD) advised that growth should initially be targeted in areas where there are not currently capacity issues within Wastewater Treatment Works (WwTWs).
- NIHE seeks to ensure that the countryside continues to be afforded a high level of protection from excessive and inappropriate development.
- HED highlighted that the growth strategy should demonstrate appropriate protection for the historic environment.
- RES Ltd and ABO Wind NI Ltd considered that the growth strategy is silent on the correlation between spatial growth and energy demand and provision. Council is encouraged to plan for this growth and in particular to substantially meet new energy demand through renewable energy.

Our consideration

- We consider that the suggested approach aligns closely with the RDS/SPDS direction, with the POP objectives and with the thrust of the Community Plan. That said, we are prepared to engage further with DfI before confirming the proposed Spatial Growth Strategy as the approach to be adopted in preparing the draft Plan Strategy.
- We note the suggested amendments to our Spatial Strategy map, but advise that the transport corridors indicated reflect the RDS Spatial Framework and therefore cannot be amended through the LDP.
- As stated on page 81 of the POP we are aware that the Spatial Growth Strategy has to be balanced with environmental considerations.
- We consider that the strategy facilitates sustainable development in the round, and thereby includes renewable energy development in appropriate locations.

Key Issue 4 Housing Allocation Strategy

★ Our Preferred Option

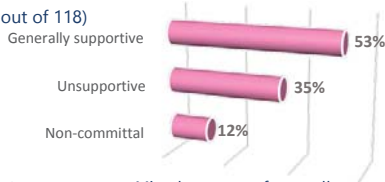
To maintain the status quo in terms of housing allocation based on the proportion of households living in main and small towns (58.5% and 14.9% respectively) at the time of the 2011 Census and increase the percentage of housing growth to villages (9.6%) and small settlements (5%) at the expense of the open countryside (12%).

Our alternative options were to maintain the status quo based on the location of 2011 households in the Borough or increase the ability to meet the RDS 60% brownfield target in settlements over 5,000.

Your response

Public responses

(Response rate: 42% - 49 out of 118)



- While there was substantial support for our preferred option, a variety of responses were received:
- Preferred option could perpetuate unsustainable patterns of growth that are counter to RDS focus to grow hubs;
- Increase sustainable patterns of growth and bolster town centre living by increasing main towns allocation to 65% and aim to meet the RDS 60% brownfield target in settlements over 5,000. Open countryside allocation should be reduced to 5%;
- Increase small towns allocation to 20%;
- Villages should be increased at a rate similar to small towns versus an alternative view to decrease their allocation to 8%;
- Mixed response for small settlements with some suggesting a larger allocation should be given to proposed small settlements to offset the loss of others. Alternatively, others considered small settlements should not be overdeveloped as this would threaten their sense of place.
- Two respondents pointed out that the strategy does not take account of an outline approval for 450 houses in Magheramorne Quarry.
- Under this issue a number of respondents considered that the main issue should be the housing growth figure, not its spatial allocation. Many considered the DfI revised HGI as being too pessimistic as it is allegedly based on housing completions during the recession,

which was not a normal period of growth. Council is urged to increase the housing growth figure and a variety of methodologies and proposed figures were suggested. These range from a modest uplift and oversupply of 15%, to figures of 8,060, around 12,000 and 16,209 if the original RDS HGI is used and a five year supply added. Some respondents also argued for an increased figure to ensure a five year supply at the end of the plan period. One respondent supported an increased HGI to offset market housing restrictions due to the social housing need being predicted to absorb 38% of the HGI over the Plan period.

Statutory Consultee responses

- Statutory consultees gave a mixed response to the preferred option.
- DfI highlighted that our evidence showed a fall between 2001-2011 in the proportion of population in Ballymena and Larne relative to their Districts, coupled with slight percentage increase of households in villages. They are concerned the preferred option reinforces this trend of disproportionate growth in lower tier settlements and will fail to strengthen the population in hubs. In turn this may not present opportunities to change travel patterns and may create pressure on existing infrastructure in villages.
- NIHE supported the preferred option and welcomed the shift to locate a greater proportion of housing within villages and small settlements rather than the open

Our consideration

- We welcome the public support given to the preferred option but acknowledge the concerns raised by DfI and will engage further with the Department before proceeding to Plan Strategy stage.
- We note the various responses in regard to the housing growth figure, and the supporting points raised. This issue will be further investigated and discussed with DfI before proceeding to Plan Strategy stage. At this point, we would refer to our recently published Housing Monitor (April 2016 – March 2017), which indicates approximately 34% over provision in terms of the estimated yield from committed housing sites and undeveloped housing zonings relative to the HGI.
- The extant outline approval for 450 dwellings at Magheramorne quarry within the open countryside, will be further considered and the implication raised with DfI.

Existing Housing Commitments

We asked

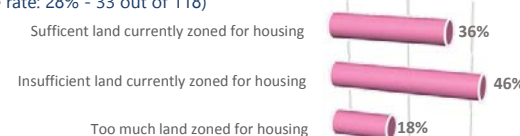
Taking account of the HGI for the Borough, our proposed Housing Allocation Strategy and existing commitment do you think there is:

- sufficient land currently zoned for housing?
- Insufficient land currently zoned for housing?
- Too much land zoned for housing?

Your response

Public responses

(Response rate: 28% - 33 out of 118)



- The majority of respondents believed insufficient land is currently zoned for housing.
- These respondents advised that a detailed review of all zoned and unzoned sites within settlement limits should take place to analyse

their deliverability. Some provided counter arguments to potential yields stated in the 2016 Housing Monitor and a number of respondents believed that additional land for housing would be required in various settlements including: Ballymena, Greenisland,

Cullybackey, Broughshane, Portglenone and Ballygalley.

- RSPB stated that the Housing Land Evaluation Framework should be applied to all zonings, including existing zonings.

Statutory Consultee responses

- DfI raised the following:
 - it is not apparent from the POP how the figure of 8,390 dwelling commitments has been established, and they are somewhat concerned that it is 35% above the HGI;
 - as housing markets cross council boundaries the housing requirements should be considered in light of the potential implications on neighbouring Councils;
 - SPPS provision relating to the maintenance of a 5 year supply of deliverable housing land during the lifetime of the Plan should be addressed;
 - clarification requested on how the excessive housing land supply
- NIHE considered there is sufficient land zoned for housing in terms of the HGI. They also made the following comments:
 - supportive of the proposed review of existing commitments to ensure that housing growth aligns with the new Spatial Growth Strategy;
 - advised that housing land allocation should take account of NIHE Housing Need Assessment and committed housing sites as there needs to be sufficient uncommitted housing sites to help address affordable housing need, on mixed tenure sites, in

from extant provisions will be addressed.

- order to create balanced and inclusive communities;
- stress that housing zonings in the new LDP should be developable and have a reasonable expectation of coming forward for residential development during the plan period;
- would like the existing uncommitted housing zonings to be subject to a feasibility assessment. Also, if the prospect of development on currently zoned land is unlikely, the zoning should be removed and alternative housing land identified. This assessment should test whether the owners are willing to provide their land for future housing development.

Our consideration

- The figure of 8,390 dwelling units quoted in the POP, represented those sites in the 2016 Housing Monitor that had a live permission or were zoned for housing/within Housing Land Use Policy Areas but did not have a live permission. This was to provide an approximate estimate of committed housing land within the Borough. Albeit, further investigation is required to determine the deliverability of dwellings on these zonings with no live permissions. It should be noted that the most recent Housing Monitor (April 2016 – March 2017), indicates approximately 34% over provision in terms of the estimated yield from committed housing sites relative to the HGI.
- We will carry out a detailed review of housing zonings, both existing and proposed, using the Housing Land Evaluation Framework. This will include analysis of their potential yield/capacity and deliverability.
- We will liaise with neighbouring and nearby councils and NIHE in relation to housing markets and housing requirements to meet special needs, including affordable housing.
- We will use our Annual Monitoring Report to assess where there may be a need to identify additional housing land beyond committed sites, consistent with our overall housing allocation strategy.
- We will engage further with DfI and NIHE in regard to specific issues raised.

Economic Development Strategy

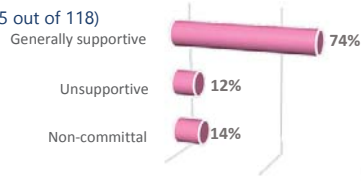
We asked

Do you agree with our suggested approach to developing the LDP Economic Development Strategy?

Your response

Public responses

(Response rate: 30% - 35 out of 118)



- 74% of respondents were generally supportive of the EDS. Comments included:
 - Invest NI was broadly supportive of the Council's EDS approach.
 - QPANI welcomed Council's intention to identify and safeguard mineral reserve areas where mineral resources exist to help ensure the future sustainable supply of minerals and aggregates to meet the needs of the local economy.
 - Some respondents, including Retail NI endorsed the approach of undertaking a full audit and review of the existing economic zonings to determine land availability and demand.
- Retail NI have reservations in respect of the release of any economic land for other uses and specifically for retailing or mixed-use development outside of designated centres.
- Retail NI also stated the need to ensure that an ample supply of economic land is in the right strategic locations and in cases of Major Employment locations, these should be at strategic locations, near transport intersections
- The increased potential for economic development in Larne and Carrickfergus due to the A2 and A8 roads upgrade should be exploited.
- Respondents highlighted the issue of land banking. LDP

Statutory Consultee responses

- There was broad support from statutory consultees.
- NIHE was content with the suggested approach of the EDS and emphasised the importance of a feasibility assessment of existing economic zonings.
- DfI Planning stated it was unclear how the preferred approach which included facilitating for economic development needs in villages, small settlements and the open countryside in line with the policy direction of the SPPS aligns with regional policy direction and the need for a robust evidential context to any departure from regional policy.
- DfI Rivers and DfI WDPD highlighted the importance of flood risk and adequate water, sewerage and drainage infrastructure respectively.
- DfI TPMU was concerned that there is no reference to accessibility or location in the EDS.
- SSE believed stronger support for the development of wind energy projects is needed to help deliver the key Economic Objectives. Also, the deployment of onshore wind could assist in providing the planned growth of approximately 8000 jobs over the plan period.

Our consideration

- We welcome the strong support for the preferred approach.
- We note DfI's concern in relation to the element of the EDS relating to villages, small settlements and the open countryside and will further engage with DfI on this.
- We note RSPB's concern but consider that Council's commitment to the safeguarding and enhancement of the environment is assessed in the final section of Chapter 5 (page 81 refers), noting that the EDS falls within the wider Spatial Growth Strategy covered by Chapter 5. Other sections of the POP, particularly Chapters 9 and 10, reinforce our commitment to the environment as one of the recognised 'pillars' of sustainable development.

Retail Strategy

We asked

Do you agree with the proposed classification for our centres and their suggested roles?; and
Can you identify any groupings of retail and associated development that could be considered for designation as a) District centres and b) Local centres?

Your response

Public responses

(Response rate: 25% - 29 out of 118)



- The majority of respondents agreed with the proposed classification for our centres and their suggested roles.
- Respondents who agreed believed a focus on a diverse range of issues including arts and culture, markets, and evening economy is key to the life and vibrancy of a town centre. It helps to attract innovators and investors and should be recognised as a catalyst for growth in conjunction with daytime uses.
- Some respondents who did not support our proposed classification suggested alternative tier structures in the Hierarchy of Centres or alternative uses within or definitions of the proposed tiers. For example a 3 tier system of Town centre/Small town as tier 1, District centre as tier 2 and Local centre as tier 3, with additional village and neighbourhood centres to be considered based on need.
- Careful identification of town centres and small towns was cautioned to ensure they do not prejudice investment and development.
- Flexibility was suggested for local shopping facilities and petrol forecourts beyond designated centres.
- A wide variety of views were received regarding the proposed inclusion of District and Local Centres in the Hierarchy of Settlements. These ranged from welcoming their inclusion, to seeking clarification of the selection process and appropriate uses within these tiers, to suggestion that the Borough was not large enough to justify these additional tiers.
- Translink suggested District centres should be centred on the local Ulsterbus network and Local centres should be within 800m.
- DfI welcomed the Council's declaration that protecting and enhancing the retail function in town centres is a key component of the proposed retail strategy. The Department notes the presentation of the hierarchy of centres in Table 5.9 and that two additional tiers have been added to reflect District and Local Centres.
- NIHE were content with the proposed classification of centres.
- HED advised that retail classifications and planned growth should consider any impact development might have on historic buildings and settings of heritage assets.

Our consideration

- We welcome the general support for the proposed designation for the Hierarchy of Centres coupled with the broad uses set out for each tier of centres.
- We note in particular the importance that respondents attach to protection and promoting the primacy of our main Town Centres.
- We note the range of views in regard to the inclusion and potential uses of District and Local Centres. We will give further consideration to this in bringing forward the Plan Strategy.

Key Issue 5 Hierarchy of Centres



Our Preferred Option

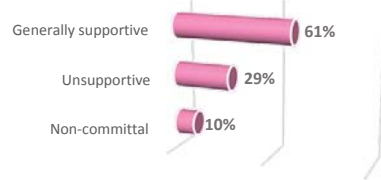
To align the Hierarchy of Centres with the proposed Settlement Hierarchy, but also include district and/or local centres.

Our alternative options were to align the Hierarchy of Centres with the proposed settlement hierarchy of the Borough or only designate Ballymena, Larne and Carrickfergus town centres as the main focus of retail development and have minimal intervention below this level.

Your response

Public responses

(Response rate: 26% - 31 out of 118)

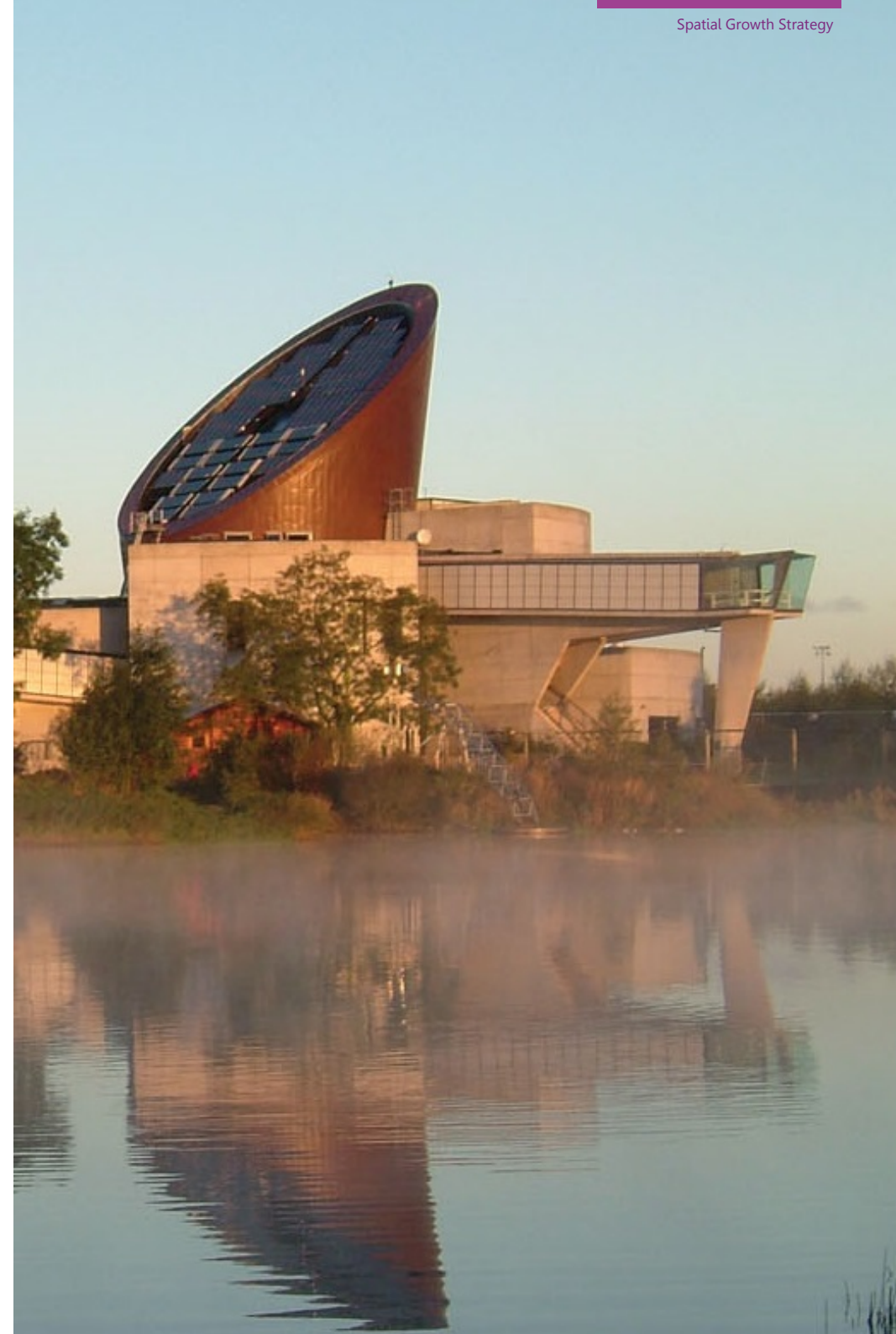


- There was broad support for our preferred option with general agreement that the Hierarchy of Centres should align with the proposed Settlement Hierarchy and that provision is made for the inclusion of district and local centres.
- However, some respondents were concerned that planned growth of small towns may dilute the main town centre offering in terms of retailing and associated uses.
- Several respondents endorsed the suggested district and local centres and some additional district and local centres were proposed while two of the suggested centres were opposed.
- Two respondents recommended that some of the suggested district centres should remain within the town centre boundaries. It was felt that reducing town centre boundaries to exclude these areas could jeopardise their ability to offer a large enough range of good sized sites and could deter investment due to the 'town centre first' approach.
- One concern was that potential de-designation of several small settlements as proposed in preferred option 2 (a), would confirm their lack of services.
- NIHE supported the designation of local centres, as this will help to define and protect their role in meeting the day-to-day needs of their surrounding neighbourhoods. Local centres can provide a particularly vital function in meeting the needs of the elderly and those without easy access to a means of transport.
- DfI were concerned that proposed designation of district or local centres that are separated from the town centre by main roads could be seen to be diluting the ethos and the spirit of the SPPS in regard to its 'town centre first' approach. Such centres should be a focus for everyday shopping and complementary to the role and function of the town centre in line with paragraph 6.277 of SPPS.
- DfI further advised that the LDP should use the RDS Hierarchy of Settlements and related infrastructure diagram to help identify the appropriate level of services and facilities for each tier in the settlement hierarchy.
- HED agreed with the preferred option, but noted that all options have the potential to have positive, negative or uncertain effects on the historic environment.
- HED welcomed acknowledgement of the linkage between the historic environment and spatial growth strategy.

Statutory Consultee responses

Our consideration

- We note the general support for the Hierarchy of Centres in regard to the centres identified for each tier.
- We note in particular the importance that respondents attach to protection and promoting the primacy of our main town centres.
- We will further consider the implications for main town centres of our proposal to upgrade the four existing villages to small towns (refer to Key Issue 2).



6.0

Sustainable Economic Growth

Economic Development

Retailing and Town Centres

Tourism

Minerals Development

This chapter is closely aligned with Theme 1 in our Community Plan 'Sustainable Jobs and Tourism'. For example:

- It highlights the local challenges and opportunities in relation to jobs and employment. In this theme we highlight our Borough as a leading and competitive place to start and grow business in a culture of entrepreneurship, skills development and vocational training, and where businesses flourish in a business friendly environment which attracts and retains employment.

- Our Community Plan also highlights the local challenges in relation to Tourism. This includes working to ensure our significant tourism assets are developed, packaged and well marketed to local, national and international visitors. One of the outcomes of Theme 1 in this plan, is for our Borough to be a destination of choice with increased visitor numbers and spend on first-class facilities and attractions.

Within our Community Plan under the key themes of 'Sustainable Jobs and Tourism' and 'Our Environment', Mid and East Antrim is highlighted as a place where there should be employment opportunities as well as a clean, safe, protected and vibrant environment. Securing an appropriate balance between these aims will fall to the LDP, for example in regard to minerals development and energy infrastructure in sensitive areas of the countryside.

The Community Plan does not refer specifically to retailing and town centres. However, the emerging Integrated Economic Development Strategy will refer to the ongoing need to regenerate town centres and develop the evening economy.



Key Issue 6 Location of Class B1 Business Uses



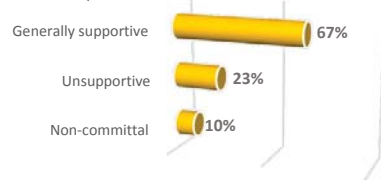
Our Preferred Option

To allow Class B1 Business Uses in town centres, district centres or local centres and within economic development zonings as part of a sequential approach.

Your response

Public responses

(Response rate: 25% - 30 out of 118)



- 67% of respondents supported the preferred option. Respondents stated:
 - The preferred option promoted vibrant town centres and also provided the necessary flexibility for Class B1 investors.
 - Invest NI was supportive, whilst Retail NI endorsed the sequential approach to ensure that town centres are always considered as the first option to drive footfall.
 - Translink welcomed the approach as existing transport networks are by and large compatible with trip generators such as offices.
 - All economic zonings should adopt a flexible approach to land uses and include Class B1 uses. These areas should be given preference in front of district and local centres in order to encourage land uptake. District centres should retain a focus on retailing and leisure roles where possible.
 - Some suggested specific individual sites which they requested should be identified as an economic development zoning in the LDP as part of the sequential approach.
 - Some respondents recognised that there may be other actions beyond the scope of the LDP that are necessary to make it easier for businesses or potential businesses to set up within the Borough, for example:
 - Some form of start-up rate relief or other incentive for an initial period might help attract new businesses.
 - Ground floors on main streets should be primarily retail, with call centres, offices etc. located on secondary streets or upstairs on main streets.
- Statutory Consultee responses
 - Statutory consultees were broadly supportive of the preferred option.
 - NIHE saw it as a way to enable a town centres first approach and provide additional opportunities to enhance the vitality and viability of town centres.
 - NIEA stated as it does not restrict class B1 Business uses to the town centre only, there was potential to encourage car use unless linked to sustainable transport policies.
 - DfI stated it was broadly in line with the SPSS which provides some flexibility for councils to specify "other locations" for such development. They requested clarification on rationale for including economic development zonings in a sequential approach.
 - HED highlighted potential for sympathetic re-use of vacant historic properties for business uses.
- Our consideration
 - We welcome the level of support for the sequential approach which is considered to offer flexibility for Class B1 uses whilst also ensuring a town centre first approach where appropriate.
 - We will therefore take these comments and considerations into account in bringing forward the Plan Strategy.

Key Issue 7 Availability of start-up and grow-on business space across the Borough



Our Preferred Option

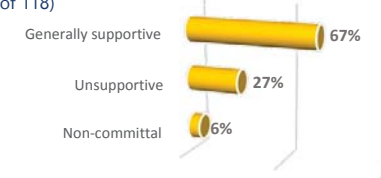
To provide for start-up and grow-on business space within economic development land/zonings by identifying land to be used specifically for start-up and grow-on business space, and utilise redundant buildings or land last used for economic development within settlements.

Our alternative options were to only use redundant buildings or land last use for economic development or only provide this type of business space within economic development land/zonings. The final alternative was to tailor policy to enable a more flexible approach in the countryside.

Your response

Public responses

(Response rate: 25% - 30 out of 118)



- 67% of respondents supported the preferred option. Respondents who supported stated:
 - Invest NI welcomed proposals to utilise unoccupied buildings to assist economic growth.
 - The re-use of existing sites and buildings should be actively encouraged by the LDP.
 - Invest NI and others stressed however, that a flexible approach is needed.
 - Caution expressed against prescriptive zoning specifically for business start-ups which could prove counter-productive as it may limit choice, drive down land values, and restrict equally suitable alternative economic uses.
 - Consider a sequential approach to accommodating start-up businesses, using up redundant buildings and sites first before permitting new development elsewhere as the latter tends to be less accessible by public transport and encourages private car use and car parking.
 - More flexibility needed in relation to start up and grow-on developments associated with agri-food production, particularly in the countryside, where thriving rural businesses should be nurtured and helped to remain in situ.
 - There should be a relaxation of planning policy in the countryside for small businesses.
 - Each hub should have a multi-purpose and accessible hub for tech companies.
 - Each hub should co-operate to facilitate specialisations in a particular industry – e.g. a renewables hub, wholesale markets hub, tech city, agri hub, R&D hub, or pharma hub.
 - New retail start-ups should be accommodated for specific time period in town centres to give experience in retail environment before determining customer base and viability to move on into their own unit.
- Statutory Consultee responses
 - Statutory consultees were broadly supportive of the preferred option.
 - HED requested a positive policy approach toward re-using vacant or underused historic assets for start-up and grow-on business space.
 - DfI TPMU had concerns that the preferred option would allow for 'edge of settlement' development.
 - DfI WDPD requested provision for green space for sustainable drainage, where appropriate, when assessing quantity of land needed for business accommodation.
 - NIHE added that consideration should be given to locations in areas of deprivation and locations well served by public transport in order to remove barriers to employment and support the development of sustainable communities.
- Our consideration
 - We welcome the support given to our preferred option.
 - We will take into consideration the views of consultees and others, as well as the findings of further studies on this subject, in bringing forward the Plan Strategy.

Key Issue 8 Alternative Uses on land zoned for Economic Development

★ Our Preferred Option

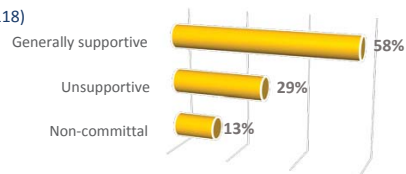
To allow alternative compatible economic uses/business falling outside Part B 'Industrial and Business Uses' (of the Planning (Use Classes) Order (NI) 2015) within zoned economic development land. This would include for the sale or display of motor vehicles; as a scrapyards; or a yard for the storage or distribution of minerals; or the breaking of motor vehicles.

Our alternative options were to safeguard land zoned for economic development use for industrial, business and storage and distribution uses only (defined in Part B of the Planning (Use Classes) Order) or allow retail, commercial and other alternative uses falling outside Part B within economic development zonings.

Your response

Public responses

(Response rate: 26% - 31 out of 118)



- 58% supported the preferred option. Respondents stated:
 - Given wide variety of compatible uses which may be appropriate, policy should allow sufficient flexibility and uses assessed on merit on a case by case basis given the impact on/conflict with neighbouring businesses.
 - Policy should not be prescriptive and should not identify car breakers and scrap yards, or the sale and display of motor vehicles which is seen as retailing and could be manipulated.
- Caution expressed in prescribing sui generis uses, as such uses are often contentious and require thorough planning assessment.
- Some respondents agreed retail should not be permitted in industrial areas as this dilutes town centre retail offerings.
- Others said provision should be made for some level of retail, commercial leisure and cafe/restaurant uses to allow for complementary services to industrial businesses on site.
- Invest NI was strongly supportive of the LDP seeking to address this issue. INI welcomed the onus placed on applicants to provide evidence their proposals are appropriate and compatible with other business uses. However, this could lessen the attractiveness of such land to businesses requiring a particularly contaminant free environment.

Statutory Consultee Responses

- Half of the statutory consultees supported the preferred option, with the other half non-committal.
- NIHE welcomed that policy will clearly state retailing will not be acceptable within land zoned for economic development.
- NIEA highlighted importance of ensuring these uses are also compatible with the surrounding environment.
- HED highlighted potential for impacts on historic environment assets and their settings which need to be considered.
- DfI stated policy for alternative uses should not be applied on a blanket basis on all economic land – instead need to specify appropriate individual zonings.

Our consideration

- Given the level of support for the preferred option, we consider that there is scope for greater flexibility in the economic development uses to be allowed on zoned sites. However, in line with the views of consultees and others, we accept the importance of ensuring compatibility between business uses on any given site.
- We will therefore take these considerations into account in bringing forward strategic policy and also in defining key site requirements for individual sites at Local Policies Plan stage.

Key Issue 9 Range of town centre uses

★ Our Preferred Option

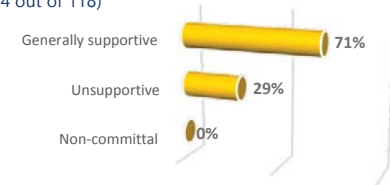
To define a Primary Retail Core (within some or all town centres) accompanied by policy to substantially protect and promote retail uses on ground floor frontages in these areas. Designate specific sites in the town centres for mixed use development (retail and other town centre uses).

Our alternative options were to set out criteria for all town centres in relation to protection and enhancement of diversity of uses or define primary retail cores in some/all town centres alongside policy to protect/promote retail uses on ground floor frontages or designate specific town centres for mixed use development. The final alternative was to have minimal Plan intervention allowing applications to be assessed on their merits.

Your response

Public responses

(Response rate: 20% - 24 out of 118)



- There was strong support for the preferred option.
- It was recognised that designation of Primary Retail Cores (PRC) where appropriate to the town centre would enable policies to be developed to promote active retail frontages, drive footfall and protect retailing from competing non-retail uses.
- There were mixed views as to which town centres should be designated with PRC's. Opinion ranged from designating only Ballymena town centre with a PRC to designating all three main towns.
- It was cautioned however that overly prescriptive criteria in PRCs can lead to high vacancy rates at ground floor level, and it was suggested that other town centre uses can strengthen the retailing role and improve evening economy.
- There was consensus that designating sites for mixed use development gives more flexibility to deliver a range of uses that create healthy town centres and an improved evening economy.
- It was emphasised that it may not be possible within PRCs to develop large scale proposals such as supermarkets given the need for convenient car parking and was therefore contended that town centres need to provide a variety of suitable opportunity sites (including re-generation and re-use) to meet the scale and form required by investors.

Statutory Consultee responses

- DfI welcomed Council striving to ensure appropriate sites are designated to provide a diverse offer and mix of uses and advised that a 'call for sites' should be undertaken.
- HED highlighted the importance of using historic properties in town centres for retail and other mixed uses to promote these centres as attractive and distinct places to live and invest.
- However, HED stressed that care must be taken not to promote a retail core on economic grounds at the expense of other policies, e.g. SPSS strategic objectives aimed at the protection, conservation and enhancement of our archaeology and built heritage.
- NIHE agreed that if the LDP defines an appropriate mix of uses on opportunity sites it will provide certainty for developers.

Our consideration

- We note the general support for PRCs and will engage in further studies to determine where such designations are appropriate. Associated policy will be developed to take account of the need for sufficient flexibility so as to minimise vacancy rates, promote evening economy and meet other aims.
- We note the support for mixed use development sites and their role in meeting particular needs and in facilitating an appropriate range of diverse uses in the town centre. We will engage in further studies to identify suitable sites.

Key Issue 10 Protecting and promoting other town centre uses



Our Preferred Option

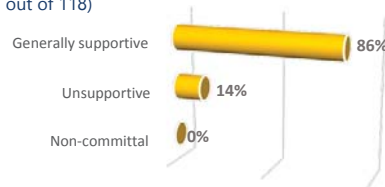
To facilitate residential use through the protection of existing housing areas and/or include housing as part of the development mix in opportunity sites. Facilitate Class B1 Business Uses on upper floor levels in town centres.

Our alternative options were only to facilitate residential use through protection of existing housing areas or include as part of mixed use opportunity sites, or only facilitate Class B1 Business Uses on upper floors, or restrict 'other' uses so as to reduce competition for sites in the town centre and retain the focus on retail. The final alternative was to have minimal Plan intervention allowing applications to be assessed on their merits.

Your response

Public responses

(Response rate: 23% - 27 out of 118)



- Most respondents were in favour of the preferred option recognising that such diversified uses can support large scale mixed use development and regeneration of town centres.
- Promoting housing as part of mixed use development was considered to offer potential to promote apartment type accommodation thereby improving prospects for increased activity in the town centre.
- Respondents suggested that protection of existing town centre housing and promotion of 'Living Over The Shop' (LOTS) would be more sustainable given the reduced need of a private car.
- However, some respondents did not consider a need to protect existing housing stock, citing that town centre development and regeneration was likely to promote a residential element to new schemes to compensate for the loss of older housing stock.
- There was a consensus that policies should be sufficiently flexible to allow for appropriate mixed uses within town centres to encourage a wide variety of uses. This in turn would help create a multi-functional centre, encourage investment, reduce vacancy and help tourism.
- Facilitating Class B1 Business Uses on upper level floors in the town centres was strongly supported.

Statutory Consultee responses

- NIHE welcomed the approach of protecting town centre housing stock and encouraged Council to promote LOTS as it increases supply of small housing units, revitalises town centres, improves security and reduces need for greenfield development.
- DfI sought more baseline information to assist in the appraisal of this option. For example to clarify how additional town centre living enhances vitality, stimulates evening economy and reduces vandalism.

Our consideration

- While noting the general support for the preferred option, we will engage further with DfI in regard to the supporting evidence base. This in turn will be informed by further studies to be carried out in advance of policy development for the emerging Plan Strategy.

- HED considered the promotion of the concept of LOTS would help to create diverse town centres. Further they promoted the re-use of vacant or underused historic assets generally, including within town centres.

Key Issue 11 Accommodating Future Tourism Demand



Our Preferred Option

Retain current strategic policy approach set out in PPS 16: Tourism (with minor amendments) for accommodating tourism development in both settlements and the countryside and bring forward bespoke policy tailored to the tourism potential of Vulnerable, Sensitive and Opportunity areas within Mid and East Antrim Borough.

Our alternative option was to only retain the policy approach set out in PPS 16: Tourism, with minor amendments.

Your response

Public responses

(Response rate: 25% - 30 out of 118)



- There was very strong support for the preferred option.
- The identification of Magheramorne quarry as an opportunity zone was particularly welcomed. However, some concern was raised about the identification of Carnfunnock as an opportunity zone.
- A number of those who supported the preferred option also expressed that the LDP should not be too prescriptive, for example there may be a need to facilitate a range of accommodation types including hotels at strategic locations.
- Those unsupportive stated that tourism development should be assessed on its own merits. The restriction of development in certain areas and the subsequent economic impact was also a key issue for those who did not support the option.
- Protection of the following areas was suggested:
 - Knockagh Escarpment
 - Sallagh Braes
 - Bashfordlands and Oakfield Glen
 - Sensitive areas that lack any formal designation.
 - A range of important strategic vistas within the Borough were also identified.
- Additional opportunity zones were suggested:
 - Village waterfronts along the coast
- The Bann valley
- Inver River Area
- Scheduled monuments including Knockagh Monument
- Ballyboley and Capanagh Forest.
- Some places were identified as both potential opportunity zones and potential areas to be protected:
 - Kilwaughter Castle
 - Carnfunnock Country Park
 - Larne Lough
 - Islandmagee
 - Drumalis Estate.
- It was also suggested that greater consideration should be given to promoting tourism through alternative uses and diversification in the countryside.

Statutory Consultee responses

- Consultees showed support for the preferred option.
- DfI highlighted that consideration needs to be given to flooding as well as infrastructure implications in relation to developments particularly in the rural area.
- Some statutory consultees particularly welcomed the intention to protect vulnerable and sensitive assets and the continued inclusion of PPS 16 policy wording.
- HED whilst non-committal in their response highlighted the potential for the policy to include a heritage led approach or the inclusion of conservation plans to enable considered and sensitive design approaches.
- Natural Environment Division raised caution in relation to the identification of Magheramorne quarry as an opportunity zone, stressing the need to ensure it is considered in the HRA due to its proximity to Larne Lough.
- Historic Monuments Council similarly highlighted the sensitivity and importance of Carnfunnock from a historic environment perspective and recommend Knockdu ASAI is listed in the vulnerable category. HED recognised its tourism potential.

Our consideration

- We welcome the strong support given to our preferred option for accommodating future tourism demand.
- We will consider comments received, including the additional suggested areas for protection and for opportunity zones.

Key Issue 12 Balancing the need for Minerals Development with safeguarding of Landscape and Environmental Assets



Our Preferred Option

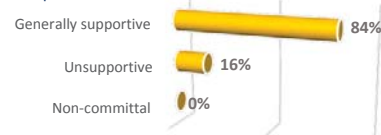
Safeguard mineral resources of economic or conservation value. There would be a presumption in favour of minerals development within designated Minerals Reserve Areas and other areas identified as suitable for minerals development. However, there would be a presumption against minerals development within areas designated for their landscape and/or environmental/h heritage significance or at least within the majority of their extent. Elsewhere proposals would be determined against existing or amended policy on a case-by-case basis.

Our alternative options were to remove the existing Areas of Constraint on Mineral Development (ACMD) and facilitate minerals development entirely through the application of existing/amended policy or safeguard mineral resources of economic/conservation value where there would be a presumption in favour of minerals development within such areas. Within this option existing/amended policy would be applied elsewhere with applications being decided on a case-by-case basis against policy criteria.

Your response

Public responses

Mineral Reserve Areas (MRAs) (Response rate: 21% - 25 out of 118)



- Whilst 84% of respondents supported the preferred option, 7% of respondents were unsupportive of ACMD.
- QPANI suggested that we carry out an economic assessment of current resources and the demand for them over the plan period, suggesting the Borough needs to safeguard 50 million tonnes of aggregate and mineral resources up to 2032.
- One representation which summarised 40 standard responses contended that the preferred options are too simplistic and are not derived from a robust evidence base. Other comments related to the failure of the POP to define what is meant by minerals development, to address

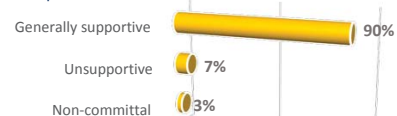
Statutory Consultee responses

- There was support for the LDP approach of identifying MRAs:
 - DfE suggested that it is important to retain Areas of Salt Reserve from BMAP 2015 due to the importance of salt extraction to the NI economy. They also suggested that MRAs should be reviewed throughout the plan period.
 - NIEA outlined that it would be important to assess whether habitats/species are likely to be impacted upon when identifying MRAs.

Our consideration

- We welcome the support for the preferred option, together with the constructive criticism and suggestions.
- We will continue to liaise with DfE and the minerals industry to build a robust evidence base that will inform the LDP and enable an appropriate balance between minerals development and the protection of the environment and the health and well-being of citizens, to be reached.
- The POP is intended to promote public awareness and debate on a range of strategic planning issues. Given the diversity of subject areas to be addressed, the identification of key issues in any subject area is necessarily selective. Key Issue 12 is considered to be a valid issue for the POP and like most other key issues in the Paper, does not need to be informed by a fully comprehensive evidence base at this stage in the Plan process.

Areas of Constraint on Mineral Development (ACMD) (Response rate: 58% - 69 out of 118)



- exploration for minerals and other specific issues relating to minerals development.
- Respondents who disagreed with the preferred option were content with the retention of the current Area of Salt Reserve and the expansion of existing quarries with applications outside these areas being decided on a case-by-case basis against policy criteria.
- Respondents who supported the LDP approach of identifying ACMD suggested:
 - Policy should seek to restrict minerals development in certain areas due to environmental and social obligations.
 - Consideration should be given to those species and habitats most at risk in terms of environmental impact.
- There was support for the LDP approach of identifying ACMD:
 - DfI/DfE confirmed that it complies with the SPPS.
 - Mid Ulster District Council suggested that adjoining Council's should work together and that Lough Beg should be protected due to its environmental value.
 - DfE outlined that there should not be a presumption against the exploration for valuable minerals in any area in accordance with the SPPS.
 - HED cautioned to consider previously unidentified archaeological remains, where extensions are proposed to existing quarries.
 - DfI suggested that clarity is needed around what is meant by "or at least within the majority of their extent".
 - NIEA outlined that the Earth Science Conservation Review should be considered when designating ACMD.
- Woodburn Forest, Larne Lough, Kilwaughter Castle and Demesne and the River Bann corridor should be considered as ACMD.
- RSPB suggested that peat extraction should be curtailed.
- The protection of "at risk" species and habitats should be considered when designating ACMD.
- QPANI suggested that there was no clear evidence for the designation of the existing ACMD and they had concerns that ACMD in the AONB could sterilise a large proportion of significant mineral resources.
- Unsupportive respondents were of the view that removal of the ACMD would provide mineral operators confidence to sustainably expand, boosting economic growth.

Key Issue 13 Safeguarding Against Potential Subsidence and the Effects of Land Instability



Our Preferred Option

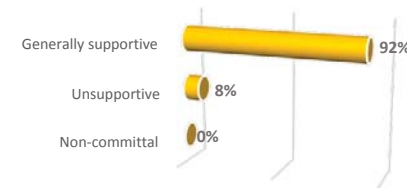
Retain the existing BMAP Areas of Potential Subsidence within the former Carrickfergus Borough and retain Policy CE 06 (which sets out a presumption against development). Also, assess if there are any other known areas of potential subsidence within the Borough that should be identified. Also, rely on existing Policy PSU 10 of PSRNI to prevent development in all areas known to be at risk from land instability – including from mining, coastal erosion, landslides and other relevant causes.

Our alternative options were to retain the BMAP Areas of Potential Subsidence in Carrickfergus, retain Policy CE 06 and assess other known areas of potential subsidence within the Borough or rely on Policy PSU 10 of PSRNI to prevent development in all areas known to be at risk from land stability.

Your response

Public responses

(Response rate: 22% - 26 out of 118)



- 92% of respondents supported the preferred option. 44% of respondents said that they were aware of areas that should be identified as Areas of Potential Subsidence.
- Respondents who supported the LDP approach with regard to subsidence believed:
 - It was in the public interest.

Statutory Consultee responses

- The acknowledgement and consideration of issues around subsidence was welcomed as this is a significant concern in Mid and East Antrim.
- DfE outlined that any increased protection should be carefully

balanced against the level of mineral development proposed and not result in a blanket ban on low impact exploration activity.

Our consideration

- We welcome the support given to the preferred option, together with the constructive criticism and suggestions.
- We will continue to liaise with DfE and Geological Survey NI (GSNI) in regard to the identification of further Areas of Potential Subsidence, the review of existing designations and in regard to any need to amend or develop existing policy.

- It was in the interest of furthering sustainable development.
- There should not be a presumption against all development in Areas of Subsidence if sufficiently robust information can be provided to demonstrate land stability.

- It is important that there is a plan for the restoration of quarry areas after the completion of operations.

- A review of all existing designated Areas of Subsidence should be carried out. Some additional areas for investigation were also suggested.

- HED suggested that the iron ore mine workings around Cargan and Glenravel are identified as additional areas that may be prone to subsidence.

7.0

Building Sustainable Communities

Housing, Open Space, Sport and Leisure

Health, Education, Community and Cultural facilities

Building sustainable communities as sought in our LDP, is also an important thread running through our Community Plan 'Putting People First'.

Two of the most relevant key themes in this context are Theme 2 'Good Health and Wellbeing' and Theme 4 'Community Safety and Cohesion' and their associated actions.

Our Community Plan aims to promote healthy places and lifestyles and some of the key actions include:

- *Urban/Community Growing Strategy, including development of allotments;*
- *Create greenways/pathways; and*
- *Support and encourage shared use of facilities within the public sector estate e.g. schools.*

The following have been highlighted as strategic infrastructure projects under these themes:

- *Housing developments and supported living to support the needs of older people and those with disabilities;*
- *Social and affordable housing developments;*
- *Open space development and recreational developments to support more active lifestyles;*
- *Integrated public open space and housing development;*
- *Public shared space developments; and*
- *Leisure provision.*

Addressing the needs of an ageing population and helping to tackle low educational attainment and health inequalities linked to deprivation are local challenges highlighted in our Community Plan.

It also includes a number of outcomes that rely on good provision of education, health, community and cultural facilities:

- *Our people are able to enjoy longer and healthier lives;*
- *Our people are physically active more often;*
- *Our older people are active, respected and supported in their community;*
- *Our Borough has health equality for all;*
- *In our Borough there are no barriers to stop anyone achieving their educational potential; and*
- *Our people and wider communities place value on life-long learning.*



Key Issue 14 Facilitating Social and Affordable Housing



Our Preferred Option

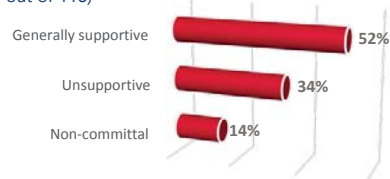
Zone sites solely for social/affordable housing in the Local Policies Plan and include key site requirements where a proportion of a general housing zoning should be provided as social housing, where a need has been identified. In addition set out strategic policy requiring that every tenth unit within new housing developments, in settlements where a need has been identified, shall be a social housing unit.

Our alternative options were to either zone social/affordable housing sites, where a need has been identified or use key site requirements to provide a proportion of social/affordable housing in specific housing zonings, to meet local needs or alternatively require all housing sites, over certain thresholds, to provide a proportion of social/affordable housing.

Your response

Public responses

(Response rate: 25% - 29 out of 118)



- Over half of the respondents supported the preferred option.
- The majority of respondents recognised the role of the LDP in helping to provide social housing. There was broad recognition that delivery should be through mixed tenure developments, with some support for a mix of dwelling types.
- Developers stressed the importance of having a robust evidence base for the preferred option to ensure it is viable and deliverable.
- A key theme from the responses, was that any social housing policy should only be applicable where a need is identified.

Statutory Consultee responses

- There was support for the thrust of the preferred option from NIHE and Causeway Coast and Glens Borough Council.
- NIHE supported the policy approach to move away from large mono-tenure estates to mixed tenure developments which should help create more balanced communities. They considered the only exception for sites zoned solely for affordable housing should be in areas with acute social housing need and little land availability. However, NIHE preferred the following option: Strategic policy requiring all housing sites, over certain thresholds, to provide a proportion of social/affordable housing. In addition, set out a strategic policy to enable the Local Policies Plan to include in certain areas zoned housing sites with KSRs for specific requirements for social housing, up to 100% when appropriate (i.e. social zoning).
- NIHE also strongly supported the introduction of a developer contributions policy to provide affordable housing.
- However, DfI advised caution regarding developer contributions toward affordable housing due to the potential impact on development viability and deliverability (See Key Issue 1).
- HED highlighted that there is potential for the re-use of vacant or under used historic assets to provide social housing provided policy is in place to ensure their appropriate redevelopment.

Our consideration

- The comments in relation to development thresholds, proportions, viability and type of affordable provision (units and developer contributions) are noted.
- We will continue to liaise and discuss the policy wording and potential mechanisms for delivering social and affordable housing with the relevant partners as the plan making process progresses, taking account of the HNA.

Key Issue 15 Delivery of Housing to Meet the Needs of People with Mobility Difficulties



Our Preferred Option

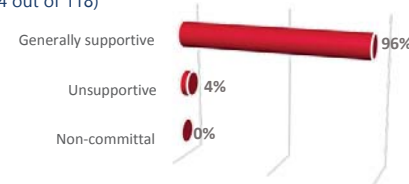
Set out strategic policy that all ground floor apartments in blocks of two storey or above should be wheelchair accessible units.

Our alternative option was to have no intervention by the LDP for the delivery of wheelchair accessible dwelling units.

Your response

Public responses

(Response rate: 20% - 24 out of 118)



- There was strong support for this preferred option from those who responded. This option was considered beneficial not only for those with mobility impairment, but also to assist with the future provision of independent living for our aging population.
- Whilst supporting the preferred option some respondents believed it should be extended to other dwelling types for the following reasons:
 - to deliver more in terms of maximising the number of accessible units and taking account of those with other mobility and mental health issues; and
 - as apartments (ground floor or otherwise) may not be suitable for other family members.
- Unsupportive comments included:
 - Provision of such units should be developer led with the Council only seeking to influence their delivery where there is an identified need.

Statutory Consultee responses

- NIHE supported the preferred option as the demand from people with a disability who wish to own their own home cannot be met and this policy would help improve market choice. They noted that there is a difference between a wheelchair accessible dwelling (which is covered by current building control regulations) and one that is to wheelchair standard so a wheelchair user can live there.
- Whilst supportive NIHE would like the proposed policy to go further and include a broader range of dwelling types.
- DfI welcomed the focus on supporting housing for people with specific needs. However, they stress the need to ensure evidence justifies the approach and that the implications of such a policy, in terms of development viability, should be considered.
- DfI also sought clarification on whether the proposed policy is intended as an internal space standard for specified wheelchair accessible dwellings.

Our consideration

- We welcome the very strong support given to our preferred option and would clarify that the policy is intended to support ground floor apartment units to wheelchair 'standard' rather than only being wheelchair 'accessible'.
- We will liaise with NIHE to build a robust evidence base demonstrating the local need for such units and further investigate their development viability.

Outdoor Sport provision - Playing pitches

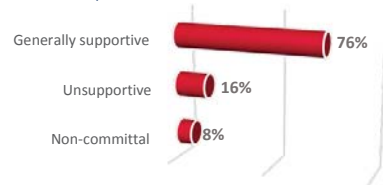
Our Preferred Approach

Zone land for new playing pitches in circumstances where Council or education authorities have committed to their development.

Your response

Public responses

(Response rate: 21% - 25 out of 118)



- The preferred approach is generally supported with agreement that provision for playing pitches should be based on an assessment of need as determined by Council, rather than on prescribed general standards.
- Those unsupportive of protecting pitches felt that it does not guarantee delivery and may hinder development of other amenities and services that could also be of benefit. Instead it is suggested that policy wording should encourage provision of new sports facilities as well as pitches to allow for a more flexible approach to their delivery.
- Others suggested that the approach should be widened to identify and protect other existing sport and recreational facilities.

Statutory Consultee responses

- The approach is generally accepted provided it is supported by a robust evidence base.
- It has been stated that the provision of pitches either through zoning or through individual applications needs to take account of the historic and natural environment and flooding.

Our consideration

- We welcome the strong support for our proposed approach.
- Our LDP will support the retention and enhancement of existing open space (which includes outdoor sports facilities such as pitches, tennis courts and bowling greens) as required by the SPPS and will actively seek opportunities to create new open spaces including playing pitches.
- Through the plan preparation process we will continue to monitor playing pitch provision with the Borough.
- Where Council or education authorities have committed to the development of new pitches, we will take account of these in preparing the Local Policies Plan.

Improving Health and Wellbeing

We asked

Are there any other ways the LDP can help contribute to improving the health and wellbeing of our residents?

Your response

Public responses

- A variety of suggestions were offered and included:
 - Ensure accessibility to green space in order to promote green exercise and active exposure to nature.
 - Promote existing sports and recreational facilities, especially water sports and provide urban sports facilities.
 - Create safe environs and mixed housing areas
 - Require health assessments to accompany residential applications.
 - Increase opportunities for economic and tourism development, e.g. strategic plan for the economic and leisure development of Larne Lough.
 - Embrace a shared space concept e.g. in town centres for all vehicles, pedestrians and cyclists.
 - Allow the development of 'dead-space' for community or renewable energy use.
 - Awareness that wind turbines are negatively affecting the recreational value of the countryside.

Statutory Consultee responses

- NIHE suggested that health and wellbeing can be improved through:
 - active travel and greater integration of landuses;
 - improved connectivity by means of cycling infrastructure and enhanced greenways and walkways; and
 - greater access to more high quality green and blue infrastructure.
- DfI also highlighted the role of blue infrastructure.
- HED suggested under-utilised open spaces associated with heritage assets such as historic graveyards as distinct and peaceful places which could be of benefit.
- NIEA Natural Environment Division highlighted the importance of meeting Water and Air Quality Standards.

Our consideration

- We welcome the suggestions made on the varied of improving health and wellbeing and will further consider these in relation to the remit and scope of the LDP.
- The LDP will seek to protect existing green spaces and ensure that new development makes appropriate provision or contribution to new or improved facilities.
- We acknowledge the health and wellbeing benefits of active travel and access to quality open space and the LDP will facilitate the development of a multifunctional network of 'green and blue infrastructure' that will also improve connectivity and help meet wider environmental aims.

Key Issue 16 Community Growing Spaces and Allotments

Our Preferred Option

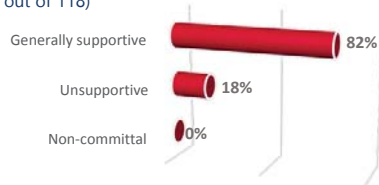
Support delivery of Community Growing Spaces/Allotments in suitable locations.

Our alternative options were to support delivery of Community Growing Spaces/Allotments within appropriate new housing developments or have no specific policy for this type of development.

Your response

Public responses

(Response rate: 19% - 22 out of 118)



- Whilst the majority of respondents were generally supportive of the preferred option, there was some support for alternative option (b) delivery of allotments within appropriate new housing developments. It was suggested that this alternative option could be expanded to allow for the provision of ancillary buildings like a greenhouse or that it should be in combination with the preferred option.
- It was noted that using existing open spaces as allotments would reduce maintenance costs which would be of benefit to both the community and Council.
- It was stressed that care should be taken to ensure that any proposed sites are suitable with regard to contamination from previous land uses.
- RSPB suggested that:
 - environmental considerations should form part of policy wording to ensure no detrimental impact on biodiversity or sensitive environmental areas;
 - proposals should be required to submit a detailed landscape strategy to show open space is adequate, well designed and integrated; and
 - a requirement to support wildlife should also be included.

Statutory Consultee responses

- Statutory consultees were supportive of the preferred option as a proactive measure towards the improvement of health and wellbeing in the Borough.
- DfI also noted that the preferred option was in line with the SPSS and the Council's Community Plan.

Our consideration

- We welcome the strong support given to the preferred option to support the delivery of community growing spaces in suitable locations, as this will positively enhance and contribute to health and wellbeing and the creation of shared spaces.
- We will consider comments in developing the wording of this policy for the Plan Strategy.
- Where firm proposals for future growing spaces have been suggested, we will take account of these in preparing the Local Policies Plan.

Key Issue 17 Community Greenways/Pathways

Our Preferred Option

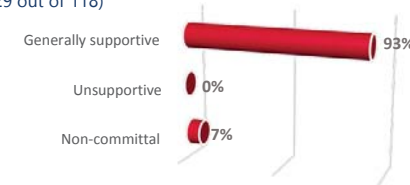
Facilitate the development of a network of Community Greenways/Pathways.

Our alternative option was to have no specific policy to protect Greenways.

Your response

Public responses

(Response rate: 25% - 29 out of 118)



- There was very strong support for the preferred option due to the multiple benefits such networks can provide.
- The following suggestions were also made:
 - The primary focus should be on promoting and utilising our existing facilities such as the Ulster Way;
 - The routes should be multifunctional and not solely for recreational use;
 - This preferred option should be used to create a wider integrated blue and green infrastructure network with access to other amenities and transport nodes;
 - The greenways should be accessible to all members of the community.
 - Account should be taken of residential amenity; and
 - Environmental issues should be considered to protect against any detrimental impact on biodiversity or sensitive areas.
- The following routes were suggested to form part of the green network:
 - The old railway line from Ballymena to Cushendall;
 - Glenariffe to Carnlough;
 - Restore Ulster way route across Garron Plateau;
 - Drumalis Estate and surrounding area to connect the Coast Road with Larne Park and Sandy Bay as a more user friendly route than the current path;
 - River Inver Walk;
 - Bank Road, Larne;
 - Ballycarry to Whitehead using Jubilee Wood and other wooded areas;
 - Layde Walk, Glenarm as a link to the coast;
 - Upper Road, Greenisland to Knockagh Monument; and
 - Land surrounding Bashfordlands and Oakfield Glen Local Nature Reserve.

Statutory Consultee responses

- Statutory consultees were broadly supportive of the preferred option and highlighted that it is key that these routes are multifunctional and that they feed into establishing a wider green network.
- DfI stressed the importance not only of providing new routes but also ensuring the protection of existing linear open spaces, greenways and railway lines.
- This sentiment was shared by HED who stated that it is important that heritage assets are protected and that any future guidance should take account of the historic environment.
- HED suggested the following historical assets should form part of and be integrated into the green network:
 - Former iron ore railway around Cargan; and
 - Historic graveyards.

Our consideration

- We welcome the strong support given to the preferred option and recognise that the community greenway policy could be expanded to support an integrated green and blue infrastructure network.
- Where specific routes have been suggested to form part of this network, we will take account of these in preparing the Local Policies Plan alongside greenways designated in existing area plans and within DfI's proposed regional network.

Key Issue 18 Play Park Provision



Our Preferred Option

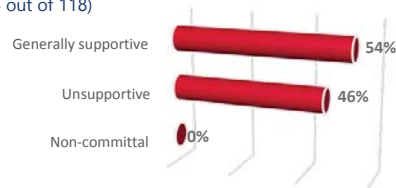
Set out strategic policy requiring residential developments of 100 units or more, or on sites of five hectares or more to provide an equipped children's play area, unless otherwise specified through key site requirements.

Our alternative options were to set out policy to accommodate children's play areas in locations owned by council or retain existing Policy OS 2 of PPS 8 (play area required in sites over 100 units/over 5 hectares) or require developer contributions from sites over 100 units/5 hectares to create/maintain council play parks or alternatively taking account of our Play Strategy assess local need and where necessary use key site requirements to deliver in housing sites or use developer contributions to create/maintain council play parks.

Your response

Public responses

(Response rate: 20% - 24 out of 118)



- Whilst the majority of respondents were generally supportive of the preferred option, there was significant support for alternative options (b) council parks (c) retaining existing policy for play parks in residential developments and (e) assessing need and using key site requirements to provide play parks or using developer contributions for council parks.
- A number of respondents thought that consideration should be given to the provision of more imaginative play equipment.
- Both those who were supportive and unsupportive of the preferred option suggested that play parks should also be provided within smaller residential sites, some suggestions included:
 - Lowering the threshold to sites of 20 units or more; or
 - On smaller sites developers could be provided with an incentive to include such facilities perhaps through any developer contribution policy.
- There was some support for Council assuming responsibility for play equipment within new private residential developments.

Statutory Consultee responses

- Responses from statutory consultees on this issue was limited and overall non-committal for the preferred option.
- NIHE were the only consultee to fully support the preferred option as a means of contributing to the health and wellbeing of children.
- DfI highlighted that play parks in residential developments is a positive step towards the provision of accessible open space. However, they stated that this option should be in addition to and not at the expense of open space that is usable by all.

They suggest that play parks should not be limited to within residential developments and that the need for such facilities should be included in the overall Open Space Strategy for the Borough.

Our consideration

- We will consider comments received including the practicality, viability and appropriateness of equipped play parks within smaller residential sites.
- We will assess local needs for the level and type of equipped children's play spaces taking into account the Council's Play Strategy (when published). When preparing the Local Policies Plan, key site requirements will be applied to zonings to assist delivery where necessary. This approach will not preclude play park proposals outside residential developments and is not intended to be the sole method of delivery.

Key Issue 19 Open Space Provision in New Residential Developments



Our Preferred Option

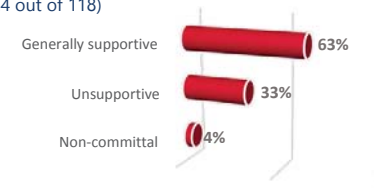
Retention of the current strategic criteria based policy regarding public open space contained in Policy OS 2 of PPS 8 i.e. setting out a 10% requirement of open space in residential developments of 25 units or more and a 15% requirement for development over 300 units and an amended list of exceptions where a rate less than 10% may be acceptable unless otherwise specified through key site requirements.

Our alternative options were to retain the criteria based policy regarding open space contained in Policy OS 2 of PPS 8 or provide strategic policy to secure appropriate open space provision on a site-by-site basis through key site requirements.

Your response

Public responses

(Response rate: 20% - 24 out of 118)



- The majority of respondents supported the preferred option.
- Unsupportive views varied from lowering the threshold for providing open space to there being no necessity for open space.
- The delivery of open space under PPS 8 was criticised and it was highlighted that the 10% target is rarely reached and that any policy change to reduce this amount should be avoided.
- Mixed views were received on the form of open space within developments, ranging from one large area to smaller informal areas.
- RSPB advocated the provision of green spaces that are ecologically functioning. They suggested that biodiversity features should be incorporated into schemes such as SuDS, green roofs, living walls, wildlife friendly vegetation and lighting, wildlife corridors and wildlife homes.

Statutory Consultee responses

- Half the statutory consultee respondents supported the preferred option whilst the other half were non-committal.
- NIHE suggested in considering policy for open space in new developments, existing habitats and vegetation should be conserved, as well as providing an opportunity to further promote biodiversity through uncultivated areas and green corridors. They also supported the requirement of Landscape Strategies to ensure open space is well designed and integrated.
- NIEA Natural Environment Division also stressed the importance of ensuring open space is linked through developments in order to provide a green network.
- HED suggested that the presence of historic environment assets or archaeological remains within a residential site may warrant the provision of greater amounts of open space than those stipulated.

Our consideration

- We welcome the endorsement given to the preferred option to support the delivery of open space in new residential developments and we will consider the suggestions for the wording of this policy.
- We acknowledge the SPPS requirement for new residential development of an appropriate scale to provide adequate open space and recognise the multiple benefits including improving health, visual amenity, conserving and enhancing biodiversity and protecting the setting of historic and archaeological assets.
- It is the intention that where possible open space in new residential developments should form part of an integrated green and blue infrastructure network across the Borough and we will take account of this when preparing the Local Policies Plan.

Health, Education, Community and Cultural Facilities

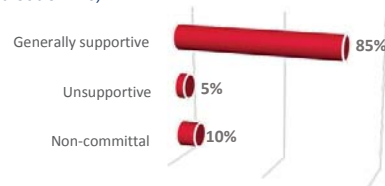
Our Preferred Approach

The Plan Strategy will set out criteria based policy to apply generally across the Borough which supports the delivery of new health, education, community and cultural facilities, in locations that encourage active travel and sustainable development and also the extension of such facilities. The Plan Strategy will also include a new strategic policy on developer contributions.

Your response

Public responses

(Response rate: 17% - 20 out of 118)



- There was strong public support for the proposed approach.
- It was stressed that there is a need to ensure such facilities are accessible to all.
- One respondent felt that the plan should be flexible if
- land zoned for 'firm' health/education/community proposals later becomes surplus to requirements during the plan period, it should be released for alternative uses.
- RSPB considered the proposed approach lacked ambition as it simply states what a plan led system will do when presented with such an application. They stated that the LDP needs to fully integrate the three pillars of sustainable development in order to be more proactive in delivering for the health and wellbeing of our population.

Statutory Consultee responses

- Statutory consultees provided positive responses to the proposed approach and the ambition to link such facilities to locations that encourage active travel.
- DfI highlighted the need to remain flexible in our approach as more concrete proposals may come forward as the plan progresses. It was also raised that the delivery of such facilities should be linked into any policy approach taken on developer contributions.
- HED felt that more consideration should have been given to the role of the historic environment and heritage assets and how they contribute to health, education, community and cultural needs.

Our consideration

- We welcome the strong support for our proposed approach.
- As the LDP will be reviewed regularly there will be opportunities to reconsider zonings for health/education/community proposals should they become surplus to requirements.
- Our LDP will aim to proactively deliver for the health and wellbeing of our population (see Overarching Principles and key issues on greenways and community growing spaces). Whilst also aware of how our rich historic environment can contribute to health and wellbeing. However, this particular issue deals solely with proposals for health/education/community and cultural facilities.



8.0

Transportation, Infrastructure and Connectivity

Transportation

Renewable Energy

Flood Risk and Drainage

Cemeteries

Telecommunications, Power
Lines and Overhead Cables
(including High Structures)

Waste and Sewerage
Infrastructure

Waste Management

Our Community Plan, under the key theme of 'Sustainable Jobs and Tourism', highlights our Borough as a place to do business through developing sufficient transport, energy and water and sewerage infrastructure.

Under the theme 'Good Health and Wellbeing' we are aiming to have high quality public services and for citizens to be more physically active so as to enjoy longer and healthier lives.

Facilitating active transport is one means of delivering on this. Renewables can also contribute to this in the long term by mitigating against the effects of climate change and improving air quality. In addition, good communications infrastructure can help to build safer and healthier communities by reducing social isolation.

Some key actions under the Community Plan 'Our Environment' theme are to:

- *Start car clubs as an alternative to car ownership;*
- *Expand community transport operations;*
- *Explore potential for development of additional cycle infrastructure;*
- *Create safe walking routes to schools and colleges;*
- *Connect existing walking and cycling routes to encourage less dependency on cars;*
- *Manage development so as to avoid building in areas prone to flooding, coastal erosion and land instability; and*
- *Encourage environmentally responsible behaviour.*



Key Issue 20 Reduce reliance on the private car / Promote sustainable transport and active travel



Our Preferred Option

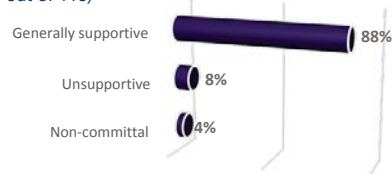
Introduce a new proactive policy for sustainable transport in new development and encourage the provision of more park and ride facilities to reduce the reliance on the private car and promote public transport.

Our alternative options were to retain the existing policy approach supporting sustainable transport and active travel or only introduce policy requiring new development within urban areas to incorporate sustainable transport and active travel modes or alternatively only encourage more park and ride facilities to reduce reliance on the private car and promote public transport.

Your response

Public responses

(Response rate: 21% - 25 out of 118)



- 88% of respondents supported the preferred option. They stated:
 - Invest NI - Good transportation systems & connectivity is key to achieving Council's top strategic priority to grow the economy.
 - If the preferred option is developed into appropriate policy it can potentially make the single greatest contribution to securing sustainable transport and active travel.
 - The transportation of people and goods is crucial to fostering economic prosperity and social integration.
 - All new development should be located/integrated so as to enable/support public transport provision and reduce dependence on private vehicles.
 - The importance and strategic role of transport corridors (Eastern Seaboard Corridor and North Corridor) which connect the Port of Larne to Belfast and the motorway network to the south and north must be enhanced.
 - Retail NI supported preferred option as would cluster businesses and services at strategic locations on the transport network. They also advised the development of a strategic transport interchange/hub would enable sustainable forms of transport within the Borough (and beyond).
- Approach needs to be even more ambitious.
- Facilitate more car sharing facilities / park and ride schemes at key locations around public transport nodes in the Borough.
- Improvements to walk and cycle access routes to bus and rail stations is much needed.
- The adoption and enforcement of travel plans to key attractors e.g. schools and colleges, etc. will improve modal share by all forms of sustainable transport
- Concerns raised in respect of isolation that many rural dwellers and students face as public transport services in the countryside are not sufficient.

Statutory Consultee responses

- NIHE supported the preferred option highlighting importance of ensuring new development includes sustainable travel patterns at the earliest stages of design and planning.
- DfI would welcome widening the focus of this preferred option to ensure all aspects of sustainable transport promoted.
- HED welcomed the approach for sustainable travel and requested Council consider the historic environment and heritage assets in key site requirements and in locating any potential facilities.
- NIEA supported this policy which could be linked with green infrastructure.
- SSE considered the POP should support electrification of transport.

Our consideration

- We welcome the very strong support given to the preferred option.
- We will work with relevant key consultees in developing a proactive policy to promote sustainable transport and active travel generally, and also in new developments.

Key Issue 21 Areas of Car Parking Restraint



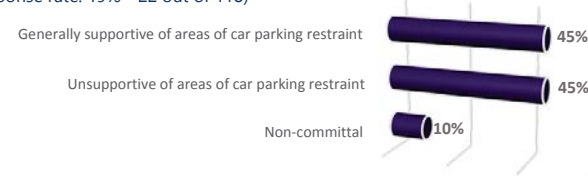
Our Alternative Options

No preferred option was put forward for this issue but instead our alternative options were to either introduce areas of car parking restraint in the main towns or to refrain from introducing such areas in the main towns.

Your response

Public responses

(Response rate: 19% - 22 out of 118)



- The respondents were evenly split on this issue. Points raised included:
 - Areas of car parking restraint will assist in promoting more sustainable transport options within main towns, however, complementary transport measures are required to make them work.
 - At present, the public transport network is simply not strong enough to justify a reduction in parking provisions.
 - Others thought town centres were already suffering from parking restrictions and this was not a matter for Planning.
 - Retail NI stated that the introduction of Areas of Parking Restraint, whilst very unpopular, would reduce the reliance on private cars in the longer term. However, for such a policy to work effectively, adequate public transport services need to be available in advance and a phased approach adopted for the introduction of Areas of Parking Restraint. Investment and improvements in public transport could be achieved throughout the Borough via developer contributions or legal agreements.
- Statutory consultees were more supportive of designating areas of parking restraint as a proactive measure towards bringing about successful place making, reducing private car usage and encouraging more sustainable forms of transportation such as walking and cycling in the Borough.
- DfI highlighted the requirement for Council to promote parking policies necessary to bring this about in line with the SPPS.
- NIHE supported the aim to promote more sustainable modes of travel and the designation of areas of parking restraint. However, somewhat contrary to this view, they also would like to see adequate parking provision for those living in town centres and above shops.

Our consideration

- Given the lack of clear support for either of these options, we will await the outcome of Council's Parking Strategy and will also liaise with DfI and other relevant key consultees as appropriate before deciding whether to bring forward strategic policy to enable the designation of Areas of Parking Restraint.

Key Issue 22 Protection of Proposed Road Schemes



Our Preferred Option

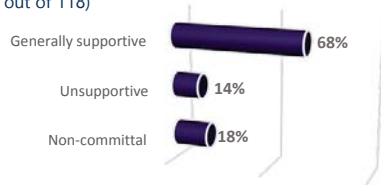
Only include non-strategic road schemes in the LDP which have been justified by Department for Infrastructure through a Local Transport Strategy (LTS).

Our alternative options were to protect land for non-strategic road schemes or remove them from the new LDP.

Your response

Public responses

(Response rate: 19% - 22 out of 118)



- 68% of respondents supported the preferred option. Respondents stated:
 - It is pointless protecting land for schemes that are not going to be implemented or funded by the DfI. This enables the Council to seek developer led non-strategic road improvement schemes.
 - It was considered whilst the preferred option is a step forward, it still allows for DfI to potentially sterilise land for 'wishlist' schemes which have little or no real prospect of delivery. Only schemes which are on a current DfI Roads Programme should be included in the LDP for protection.
- Translink stated the LTS must also include requirements for bus routes, bus stops, turning circles, etc. for each road scheme, particularly if it is to facilitate new housing development.
- One response focused on the Ballymena West Link Proposal, unimplemented for 28 years and yet the lands required are still protected from other development. As these routes are not on Key Transport Corridors (KTCs) or on DfI's Strategic Road Improvement Programme, private developer input is the expected delivery mechanism. However, as there are no substantial housing zonings yet to be developed in these areas there is no private sector impetus to deliver these.
- Consideration should also be given to zoning additional lands provided there is a commitment from a developer to contribute to road infrastructure. However delivery will only be achievable if areas made available for development are of sufficient size.
- Although quarry operators supported the preferred option, they also stated that ongoing protection for non-strategic road schemes was an important factor influencing the success of their businesses.

Statutory Consultee responses

- DfI was supportive of the preferred option and confirmed the Local Transport Strategy will identify proposed transport schemes for the Borough.
- Whilst they state it would be prejudicial to rule in or out any transport schemes at this stage, DfI acknowledge, given the time that has passed since these non-strategic roads were designated in area plans, that it is not unreasonable to test these routes before committing to them for the duration of the new LDP.
- DfI contend that these non-strategic schemes are not just for vehicles but also provide connectivity between developments and other existing network assets for cyclists and pedestrians. Suitable cycle, pedestrian and public transport facilities should be incorporated into the design for these routes, in the event that they are retained in the LDP.
- HED and NIEA both advised caution given that some of these non-strategic road schemes were designated some 20+ years ago and therefore were not considered in the policy context of PPS 6, PPS 2 or SPPS.

Our consideration

- We welcome the support given to the preferred option and will now await the emerging Local Transport Strategy and work closely with DfI in deciding which non-strategic road schemes will be identified in the LDP.

Key Issue 23 Facilitating Renewable Energy



Our Preferred Option

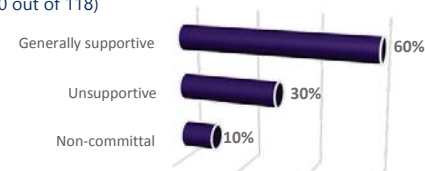
Retention of SPPS approach updating Policy RE 1 of PPS 18 by adopting a cautious approach within designated landscapes.

Our alternative option was to restrict or prevent renewable energy development for certain types of renewables (e.g. tall structures) within designated landscapes (or in highly sensitive areas within these landscapes) and amend policy accordingly

Your response

Public responses

(Response rate: 25% - 30 out of 118)



- Whilst 60% of respondents generally supported the preferred option, comments were mixed and included:
 - The Borough generally, and AONB in particular, is ruined by turbines. An even more cautious and restrictive approach than alternative option 23(b) should therefore be considered.
 - RSPB stated the preferred option is not sufficiently ambitious and should seek to identify the most sensitive landscape zones remaining for protection (including species and habitats – not just visual quality) and incorporate elements of alternative option 23(b).
 - Large scale ground mounted solar PV considered particularly inappropriate in open, upland landscape locations.
 - LDP should identify and designate areas for turbines rather than allow for random development throughout the Borough.
 - LDP should prevent a growing concentration of turbines in certain areas.
- LDP should include renewable energy targets and support the contribution of renewables to combating climate change.
- Quarry operators sought policy provision for renewable energy development associated with minerals operations to be considered generally acceptable.
- Sensitive coastal landscapes with strategic viewpoints, particularly the unique pattern of headlands, need protection from turbines.

Statutory Consultee responses

- There was a mixed response from consultees.
- HED had concerns regarding existing cumulative impact of renewable energy structures on landscapes and historic environment assets and consider benefits in alternative option 23(b).
- HMC recommended alternative option 23(b) to ensure the protection of designated landscapes from inappropriate renewables development.
- NIHE agreed with the preferred option and highlighted opportunity for LDP to take a holistic approach, developing energy policy that encompasses renewable energy development, energy efficiency and a reduction in energy demand.
- MUDC encouraged consideration of a Special Countryside Area along Lough Beg as this would add further protection to this shared environmental asset.
- SSE stated renewable energy developments should be considered on their individual merits as regional policy contains no suggestion that area-wide prohibitions on development would be appropriate.
- ABO Wind NI Ltd highlighted a need for flexibility in the LDP so that all renewable options remain open for consideration given that renewable energy technology is rapidly evolving.

Our consideration

- We welcome the support given to the preferred option and appreciate the differing views on this complex issue.
- We note that the alternative option was supported by respondents to Key Issues 30 and 33, relating to the protection of the Islandmagee Coast and the Antrim Coast and Glens AONB respectively.
- We will continue to work with key consultees in developing a balanced renewable energy strategic policy for the Plan Strategy.

Key Issue 24 Sustainable Drainage Systems (SuDS)



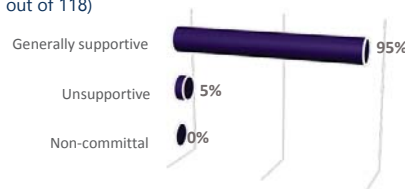
Our Preferred Option

Promote SuDS within the Local Development Plan.

Your response

Public responses

(Response rate: 18% - 21 out of 118)



- There was overwhelming support for SuDS from respondents. Comments included:
 - SuDS policy and practices should apply in all new developments regardless of location or flood risk.
 - SuDS should be combined with renewable energy technology
- e.g. hydro schemes, to make use of water flows etc.
 - Any system able to capture storm water efficiently and quickly is a must.
- Other circumstances where SuDS should be implemented:
 - Provision of hard standing in developments that allows drainage.
- In new road development or large surface car parks.
- On upland farms/land to slow water run off to rivers that then flow through urban areas.

Statutory Consultee responses

- Statutory consultees were supportive of the preferred option as a proactive measure to manage and mitigate flood risk.
- NIHE was content with our suggested approach to promote SuDS within the LDP.
- NIEA also welcomed our preferred option to promote SuDS and added it would be preferable if this was to occur across the Borough to get catchment level effects.
- MUDC recognised the important role of SuDS but in the absence of a statutory or legislative requirement to implement SuDS, they will retain SPPS approach.
- HED advised Council to carefully consider the impact of SuDS on any archaeological sites and heritage assets.
- DfI Planning welcomed the change in emphasis from 'encouraging' to 'promoting' SuDS in a more proactive manner.
- DfI Rivers endorsed the general comments on SuDS.
- They also advised housing density should be reduced to allow more space for filter strips or other SuDS.

Our consideration

- We welcome the very strong support given to the preferred option to promote rather than just encourage SuDS in new developments.
- Given this level of support for promoting SuDS, we will now work closely with the relevant statutory agencies to investigate further how the LDP can promote SuDS taking account of the wider governance constraints that currently persist – such as the absence of a regulatory body for consultation on and adoption of SuDS schemes.

Key Issue 25 Cemeteries



Our Preferred Option

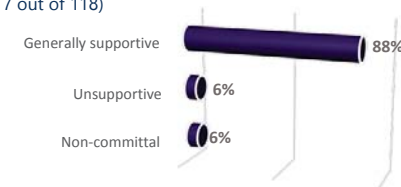
Criteria based policy to support the delivery of a new cemetery or an extension to a cemetery. In addition, facilitate the identification and safeguarding of specific locations where there is a firm proposal for a new /extension to a cemetery.

Our alternative option was to have no intervention by the LDP and rely on development management to determine cemetery proposals on a case-by-case basis using normal planning considerations.

Your response

Public responses

(Response rate: 14% - 17 out of 118)



- Despite the low response rate, the majority of respondents were supportive of the preferred option.
- One respondent suggested consideration should be given to the provision of a crematorium.
- There were no other comments given by respondents to back up their opinions.

Statutory Consultee responses

- DfI welcomed the Council's consideration of this locally important issue in light of the District Profile.
- Historic Monuments Council highlighted the need to consider the potential impact of cemetery extensions on buried archaeological deposits associated with earlier activity on ecclesiastical sites, and the impact on the character and setting of such sites.
- HED also advised careful consideration on impact of facilitating future cemeteries through policy – particularly in relation to heritage assets and historic graveyards and their settings which are an extremely important part of the historic landscape.
- They also highlighted the likelihood of encountering archaeological remains including historic human remains around historic graveyards.

Our consideration

- We welcome the strong support given to the preferred option to support the future delivery of cemetery space in our Borough.
- Given this level of support, we will now consider developing criteria based policy for the Plan Strategy.

9.0

Stewardship of our Built Environment and Creating Places

Archaeology and Built Heritage
Place-Making and Good Design

The conservation and protection of our heritage assets supports our Community Plan themes of promoting 'Good Health and Wellbeing' and 'increasing awareness' and 'positive attitudes' towards 'Our Environment'.

Heritage sites are important for a variety of cultural, social and environmental reasons. They make significant contributions to the distinctiveness of places by enhancing their character and identity. This, in turn, has a positive influence on the quality of life enjoyed by communities and promotes a sense of belonging.

Regeneration, housing, education, economic growth and community engagement are examples of the ways in which heritage can make a positive contribution to community life and help improve and broaden access to, and understanding of, local heritage.



Key Issue 26 Protecting regionally significant archaeological sites and remains from harmful development



Our Preferred Option

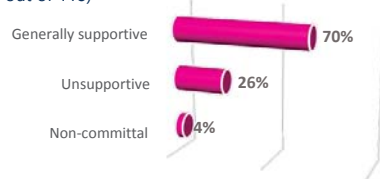
Retain the current operational policies as set out in BH 1 of PPS 6 and provide increased policy protection to safeguard our archaeological sites and remains (and their settings) from harmful development through the designation of Specific Areas of Constraint within, or adjacent to, existing or proposed Areas of Significant Archaeological Interest.

Our alternative options were to retain current policy BH 1 of PPS 6 and provide increased policy protection through the designation of a Special Countryside Area (SCA) to protect the Area of Special Archaeological Interest (ASAI) at Knockdhu or only retain current policy BH 1 with no increased policy protection.

Your response

Public responses

(Response rate: 23% - 27 out of 118)



- There was strong public support with 70% agreeing with our preferred option. Those respondents who supported the preferred option suggested that:
 - It will ensure increased protection for our fragile and most vulnerable sites; and
 - Protecting our heritage assets will ensure the Borough maintains its distinctive character and rich history, which can be critical for attracting tourism and a retaining a sense of place.
- QPANI were supportive and have established a Memorandum of Understanding with HED regarding investigation of potential archaeological remains on proposed quarrying land.
- One respondent felt that the existing policy provision was sufficient and that any additional protection may act as a barrier to appropriate development proposals thereby discouraging investment.
- Two respondents suggested that Ballycarry and Glenwherry Glen should be designated as ASAs.

Statutory Consultee responses

- Statutory consultees were generally supportive of the preferred option.
- DfI noted that the preferred option was in line with RDS and SPPS and were encouraged to see that the protection of these assets is at the forefront of the Council's approach to plan making and that the social, environmental and economic importance of such assets is realised.
- HMC recommended that a similar proactive approach should be applied to other regionally significant archaeological sites and remains.
- HED welcomed the preferred approach but sought clarification as to how this designation would be brought forward and what criteria would be used.
- ABO Wind NI Ltd acknowledged the importance of conserving and

protecting the Borough's built heritage and archaeological features but were strongly opposed to the preferred option stating that the existing policy provision within the Larne Area Plan (Policy MAN EN 1) is sufficient.

Our consideration

- We welcome the strong support given to the preferred option. We recognise the regional significance and importance of Knockdhu and will therefore consider appropriate protection and conservation of the archaeological remains and their settings in this area through the Local Development Plan process.

Key Issue 27 Protecting architectural and historical character within our conservation areas



Our Preferred Option

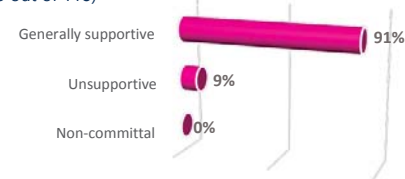
Carefully manage change by introducing additional regulation through the implementation of Article 4 Directions to remove certain permitted development rights within areas which have been identified as still retaining their local character and distinctiveness.

Our alternative option was to retain the current policies in PPS 6 and not introduce additional regulation.

Your response

Public responses

(Response rate: 19% - 23 out of 118)



- There was very strong public support with 91% of respondents agreeing with our preferred option.
- One respondent suggested that specific design guidance should be produced for all Conservation Areas and Areas of Townscape Character.
- It was suggested that the removal of certain permitted development rights should be extended to include small settlements where existing architectural features are threatened.
- Care should be taken to ensure that the introduction of Article 4 Directions does not lead to properties of architectural significance being neglected if regulations are too strict.
- Translink advised caution in the wording of this policy to ensure that Ticket Vending Machines at key locations are not precluded.

Statutory Consultee responses

- Statutory consultees were supportive of the preferred option as a proactive measure to facilitate the retention of local character and distinctiveness.
- HED welcomed the opportunity for the removal of certain permitted development rights to non-designated heritage assets within conservation areas and supports the greater emphasis on 'enhancement' in Conservation Areas.
- DfI were supportive of our preferred option and welcomed the more widespread application of Article 4 Directions within Conservation Areas.
- HMC agreed with the preferred option in relation to the provision of additional protection in specific areas within conservation areas which still exhibit their local character and distinctiveness.
- NIHE were supportive and noted the importance of enhancing local character to promote a sense of place and community ownership.

Our consideration

- We welcome the strong support shown for our preferred option to support additional regulation to remove certain permitted development rights within those parts of conservation areas which have been identified as still retaining their existing historic character.
- More generally we will seek to protect and conserve our built heritage assets whilst recognising their importance and role in stimulating the tourism and regeneration of our town centres and place shaping.

Key Issue 28 Safeguard our Non-Designated Heritage Assets



Our Preferred Option

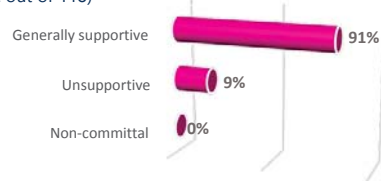
Establish a criteria based approach with Historic Environment Division for identifying non-designated heritage assets within the Borough that will be used to create a Local Heritage List. Provide the strategic policy framework to enable the designation and retention of locally significant heritage assets through the LDP

Our alternative option was not to bring forward any specific measures to safeguard against the potential loss of non-designated heritage assets.

Your response

Public responses

(Response rate: 19% - 22 out of 118)



- There was strong support for this preferred option from those who responded. This option was considered beneficial in that it would create greater public awareness and respect for the value of our historic architecture and heritage.
- Invest NI welcomed proposals that would recognise former industrial premises as an important heritage asset and suggested they can play an important role in growing the

economy through regeneration projects to assist economic growth.

- Concerns were raised by one respondent who suggested that this would simply add an unnecessary layer of uncertainty and subjectivity.
- One respondent whilst supportive of our preferred option, stated that there is a need for a more flexible approach by statutory agencies to allow for appropriate

sympathetic alterations to historic buildings so as to act as a catalyst for regeneration.

- A number of respondents suggested that the following non-designated built heritage assets should be considered for local listing:
 - Kilwaughter House;
 - Ballypriormore Grave Yard; and
 - Cairncastle Souterrains.

Statutory Consultee responses

- NIHE were supportive and noted the importance of enhancing local character to promote a sense of place and community ownership and would also support the use of Building Preservation Notices.
- DfI welcomed the recognition given to the local historic environment.
- HMC commended the proactive approach contained within the

POP regarding non-designated heritage assets.

- HED welcomed the approach adopted by the preferred option but suggested that any approach to safeguarding of non-designated heritage assets should be aligned with existing designations and policy provision.

- HED recommended consideration of Buildings at Risk in the LDP and suggested that it may be appropriate for policy consideration to retain a separate policy towards addressing Buildings at Risk and the potential to target their protection, conservation and re-use.

Our consideration

- We welcome the strong support shown for our preferred option to support the local listing of non-designated heritage assets.
- We acknowledge the high level of support for our preferred option, but consider that further engagement with HED and other relevant bodies is necessary to take account of the deliverability of the preferred option and its workability in terms of protecting these assets.

Strategic Focus Areas

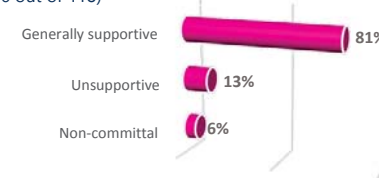
We asked

Do you agree with our approach to identify and designate Strategic Focus Areas within some settlements and develop bespoke design criteria for these areas?

Your response

Public responses

(Response rate: 14% - 16 out of 118)



- The majority of respondents were supportive of our approach to identifying and designating Strategic Focus Areas stating that a greater emphasis on place-making and design will result in a high quality built environment for all.
- RSPB suggested that biodiversity considerations should be included within this approach to ensure that the protection and enhancement of urban biodiversity can be achieved.
- Translink indicated that their operational requirements need to

be catered for within this preferred approach to place-making.

- One respondent suggested that whilst this approach would result in a high quality built environment and public realm any design criteria should not be overly prescriptive or constraining.

Statutory Consultee responses

- NIHE strongly welcomed a place shaping approach, stating that good design is vital to emphasize the unique qualities of a place and reinforce local character and distinctiveness and that community involvement in place shaping should be central to any consultation process relating to this approach.
- DfI were supportive of our proposed approach stating that it was in line with the emphasis on the importance of local distinctiveness and positive place-making as contained within the RDS and SPSS. They also noted that the delivery revolves around collaborative working between a number of key stakeholders and that adopting a Strategic Place Shaping approach has the potential to define and promote a positive image, help grow the economy and tourism sector, promote social cohesion and inclusion, and induce civic pride.
- HED and HMC both advocated the approach of identifying Strategic Focus Areas. HMC suggested that bespoke design criteria should be developed for each area.
- HED also stated that Strategic Focus Areas should be aligned to existing designations and their associated policies as these assets
- The following areas were suggested as possible candidate Strategic Focus Areas:
 - Kilwaughter Castle, Glenarm Harbour, Carnlough, Carnlough, Cairncastle, Larne Town, Larne Harbour/Redlands Industrial Estate, Willowbank and Ledcom, Lower end of Larne Main Street (next to Glenarm Rd), Dunluce St. Larne, Larne Lough and Magheramorne Quarry;
 - Michelin factory, Ecos Centre, St. Patrick's Barracks Ballymena, Galgorm, Portglenone and Cullybackey; and
 - Carrickfergus Castle and Carrickfergus Walled Core.

may be vulnerable to inappropriate development, resulting in the loss of the District's historic character. They suggested that a number of historic settlements would benefit from this approach including reconnecting Carrickfergus historic core with the Castle through enhanced interpretation and good design and place-making.

- NIEA noted that there is an opportunity to include 'enhancing biodiversity' in any bespoke design criteria for strategic focus areas located near community greenways or green infrastructure.

Our consideration

- We welcome the strong support shown for our approach to place-making through the identification and designation of Strategic Focus Areas and the development of bespoke design criteria.
- We will consider the areas identified above as potential candidates for a Strategic Focus Area approach to place-making and will take account of any views expressed by the public and consultees on this matter.
- We will undertake to collaborate with local communities to further refine our approach to place-making within any Strategic Focus Areas that are identified.

10.0

Protecting and Accessing Our Natural Environment

Mid and East Antrim Coast

Other Sensitive Landscapes

Within our Community Plan, developing our tourism offer is prioritised and safeguarding our tourism assets including built and natural heritage assets will be an important element of this.

Our Community Plan is committed to protecting, enhancing, and sustainably managing our environment, including the natural environment and built heritage, and providing easy access to it.

Under 'Our Environment' theme, we propose a list of actions that, target attitudes, access and assets.

These actions include:

- Encouraging environmentally responsible behaviour;
- Connecting and promoting walking and cycling routes;
- Exploring options for a coastal access path; and
- Managing development so as to avoid building in areas prone to flooding, coastal erosion and land instability.



Key Issue 29 The Southern Glens Coast



Our Preferred Option

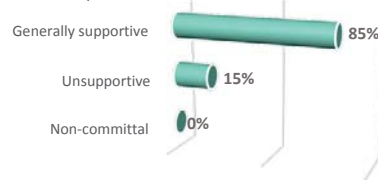
Retain the existing Special Countryside Area (SCA) designation and associated policy and accommodate spatial and policy amendments to the designation if considered appropriate.

Our alternative options were to retain the existing SCA designation and associated policy or remove the SCA designation, relying only on carried forward regional policies (such as PPS 2, PPS 18 and PPS 21) for protection of the this exceptional coastal landscape and its natural environment.

Your response

Public responses

(Response rate: 23% - 27 out of 118)



- The majority of respondents were generally supportive of the preferred option, however, there was some support for alternative option (b) which was to retain the existing SCA designation and associated policy.
- Generally, it was expressed that protection of the landscape and environmental assets of this stretch of coast is desirable and necessary, for example, with regard to maintaining a sense of place and protecting the landscape which is a valuable asset for tourists and residents.
- The public identified particular threats to this exceptional landscape, for example, renewable energy infrastructure, increasing the height of the sea wall, inappropriate development, and development which does not integrate sympathetically with the landscape/coastal setting.
- One respondent stated that policy should make provision for some small, discrete sites with facilities to accommodate tourists wishing to stay in the area e.g. camping/touring caravan sites.
- Another respondent suggested that the requirements of people living in the area should be taken into consideration in any policy amendments.
- A representation on behalf of quarry companies stated that the extent of the existing SCA is sufficient to meet the aims of the designation.

Statutory Consultee responses

- Generally, statutory consultees were supportive or neutral in response to the preferred option. However, it was generally recognised that the SCA is a positive policy tool to protect this exceptional landscape from unnecessary and inappropriate development.
- DfI stated that the preferred option was in line with the SPPS.
- NIEA were supportive of the protection of the setting of coastal settlements on the Coast Road and welcomed the opportunity to assess if the extent of the designation should be expanded.
- HED stated that field boundaries perform an important role in relation to biodiversity and landscape character.

Our consideration

- We welcome the strong support given to the preferred option to support the retention of the existing SCA and to assess if any spatial or policy amendments to the designation are appropriate.
- We recognise the importance of this exceptional landscape to the identity of the Borough and as a heritage and tourism asset. Therefore, we will seek to facilitate appropriate protection and conservation of the environment, landscape and natural and built heritage in this area through the LDP process.
- Potential spatial and/or policy amendments to the SCA will be informed by further study, including ongoing engagement with relevant statutory consultees. We will also take account of the comments received in response to this consultation.

Key Issue 30 The Islandmagee Peninsula and Gobbins Coast



Our Preferred Option

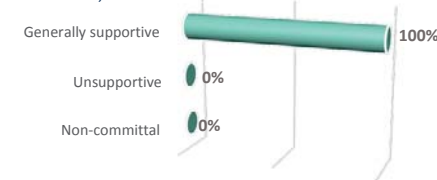
Provide increased policy protection for the Islandmagee Peninsula with an emphasis on the eastern and north eastern parts of the peninsula. Increased policy protection could be provided through designation of a Special Countryside Area, an Area of Constraint on particular types of development, an extension of the BMA Coastal Policy Area or a designated Area of High Scenic Value.

Our alternative option was to rely on carried forward regional policies (such as PPS 2, PPS 18 and PPS 21) for protection of the landscape and natural environment.

Your response

Public responses

(Response rate: 19% - 22 out of 118)



- All of the respondents who expressed an opinion were supportive of the preferred option.
- Generally, it was expressed that there is a need to protect sensitive areas on the peninsula from inappropriate development. Some comments referred specifically to the adverse visual impacts that wind turbines and electricity infrastructure has had on the landscape in this area. However, it was also recognised by some respondents that Islandmagee has an important strategic role for the NI energy sector.
- Some respondents stressed the importance of Larne Lough and the surrounding area as a valuable wildlife area, noting the designations in regard to sites of international and national importance for nature conservation. They therefore argued for increased policy protection through the LDP.
- One respondent, whilst supporting the preferred option, stressed the need to give due consideration to the needs of residents in the area.

Statutory Consultee responses

- Statutory consultees were generally supportive or neutral in response to the preferred option.
- DfI confirmed that the approach of the preferred option appears to conform with prevailing regional and strategic policy direction.
- NIEA were supportive of the preferred option whilst highlighting that any appropriate designation(s) and policy to protect sensitive areas on the Islandmagee peninsula would need further consideration and clarification.
- HED highlighted the importance of an evidence base to indicate how the historic environment has been considered in any new policy approach.
- A representation from the energy sector was unsupportive of the preferred option, but did not provide a justification for this position.

Our consideration

- We welcome the strong support given to the preferred option for increased policy protection for vulnerable areas sensitive to change on the Islandmagee Peninsula.
- We will seek to protect and conserve the landscape and natural and built heritage assets, particularly in this Area of Scenic Quality, whilst balancing this with other interests, including tourism and the important strategic role the Islandmagee Peninsula has for the energy sector in NI.
- Potential designations will be informed by further study, including ongoing engagement with relevant statutory consultees. We will also take account of the comments received in response to this consultation.

Key Issue 31 The Belfast Lough Shoreline (Mid and East Antrim)



Our Preferred Option

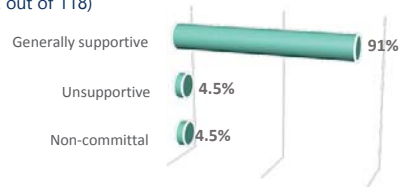
Retain the existing BMA Coastal Area (to be renamed the Belfast Lough Shoreline (Mid and East Antrim) Policy Area) designation and associated policy, and accommodate spatial amendments to the designation if considered appropriate.

Our alternative options were to retain the BMA Coastal Area designation and associated policy or remove this designation and rely on carried forward regional policies (such as PPS 2, PPS 18 and PPS 21) for protection of the coastal landscape and natural environment.

Your response

Public responses

(Response rate: 19% - 22 out of 118)



- The majority of respondents were supportive of the preferred option.
- It was highlighted that this stretch of coast is popular with visitors.
- It was stressed that areas with specific characteristics or other important features should be safeguarded as they create a sense of place and benefit the tourism sector.
- One respondent was non-committal. The respondent stated that only protecting the shoreline did not go far enough, and that a more appropriate policy approach would be to seek the restoration of degraded parts of the shoreline.

Statutory Consultee responses

- Statutory consultees were generally supportive or neutral in response to the preferred option.
- DfI stated that they support the intention to retain the existing BMA Coastal Area designation.
- NIEA expressed support for retaining the existing designation and agreed that spatial amendments may be required.
- Both HED and the Historical Monuments Council support the preferred option.
- A representation from the energy sector was unsupportive of the preferred option, but did not provide a justification for this position.

Our consideration

- We welcome the strong support given to the preferred option to retain and rename the existing BMA Coastal Area designation and to consider spatial amendments to the designation if considered appropriate.
- We recognise the significance of this part of the Belfast Lough shoreline in regard to recreational activity, visual amenity, tourism, built heritage, the coastal ecosystem and wildlife, and will therefore seek to ensure appropriate protection of this stretch of coast and associated assets.
- Potential spatial amendments to the designation will be informed by further study, including ongoing engagement with relevant statutory consultees. We will also take account of the comments received in response to this consultation.

Key Issue 32 Lough Beg and the Lower River Bann Corridor



Our Preferred Option

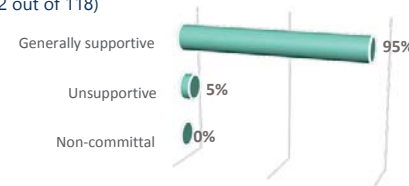
Provide increased policy protection for the most scenic and environmentally important areas associated with Lough Beg and the Lower River Bann corridor.

Our alternative option was to rely on carried forward regional policies (such as PPS 2, PPS 18 and PPS 21) for protection of the landscape and natural environment.

Your response

Public responses

(Response rate: 19% - 22 out of 118)



- The majority of respondents were supportive of the preferred option.
- It was highlighted that these sensitive areas contribute to providing a sense of place and benefit the tourism sector. The environmental quality and importance of the area for wildlife and biodiversity was stressed. For example, it was highlighted that the Lough Beg area is important for migrating whooper swans.
- Comments received stressed the need to protect these sensitive areas from inappropriate and unnecessary development, particularly residential development.
- RSPB recommended that Lough Beg and wider hinterland should be included in a SCA to provide a buffer to development for important nature conservation sites.
- RSPB contend that peat extraction be terminated and appropriate management of this habitat pursued.
- RSPB recommended Council adopt a "joined-up" policy approach with Mid Ulster District Council in regard to the protection of Lough Beg.
- One respondent stated that there needs to be consideration given to the people of the area who want to develop their land.

Statutory Consultee responses

- Statutory consultees were generally supportive or neutral in response to the preferred option, whilst stating that any new designation and policy would require further consideration and clarification.
- Antrim and Newtownabbey Borough Council, Mid Ulster District Council (MUDC) and NIEA encouraged a "joined-up" policy approach between adjacent council areas and it was suggested that this could be facilitated through the Lough Neagh and Lough Beg Forum.
- MUDC emphasised that Lough Beg is a site of scientific and natural heritage importance and would encourage the formulation of policy to resist development that would impact negatively on the character of the Lough Beg area.
- MUDC have proposed a SCA along the western fringes of Lough Neagh/Lough Beg and along part of the Lower Bann corridor. They would encourage consideration of a similar designation along the Mid and East Antrim side.
- MUDC have indicated that common planning issues needing to be addressed in a joined up way by both LDPs include: environmental designations: minerals development, sustainable tourism and flooding.
- A representation from the energy sector was unsupportive of the preferred option, but did not provide a justification for this position.

Our consideration

- We welcome the strong support given to the preferred option to support an increase in policy protection for the most sensitive areas along Lough Beg and the Lower River Bann corridor.
- We will continue to engage with adjacent Councils and statutory consultees through the Lough Neagh/Lough Beg Forum, and subject to the evidence base, endeavor to adopt a co-ordinated policy approach with neighbouring Councils.

Key Issue 33 Antrim Coast and Glens Area of Outstanding Natural Beauty (AONB)

Our Preferred Option

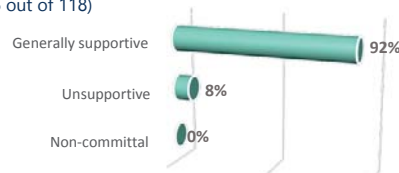
Provide increased policy protection to protect exceptional landscapes and areas considered highly sensitive to particular types of development within the Antrim Coast and Glens AONB.

Our alternative option was to rely on carried forward regional policies (such as PPS 2, PPS 18 and PPS 21) for protection of the AONB.

Your response

Public responses

(Response rate: 22% - 26 out of 118)



- The majority of respondents were supportive of the preferred option.
- Some respondents supported additional protection to resist inappropriate development, particularly in prominent locations, and to further protect sites of national or international conservation importance. Some locations put forward for inclusion within spatial policy areas included the Coast Road,
- coastal villages and headlands, Feystown/Glenarm area, the Garron Plateau, the Glenwherry area, Sallagh Braes and Slemish.
- It was highlighted that areas within the AONB could represent opportunities for tourism development.
- Reasons received for opposition to the preferred option included the need for more flexible design policy and that the preferred

option is too precautionary in terms of stifling opportunities for minerals development. One representation on behalf of eight quarry companies advocated removal of existing Areas of Constraint on Minerals Development and stated that the limited availability of high-grade Ulster White Limestone in NI will necessitate this limestone to be worked in areas within the AONB.

Statutory Consultee responses

- Statutory consultees were generally supportive or neutral in response to the preferred option.
- NIEA state that parts of the AONB have been, and continue to be, impacted by the cumulative impacts of development over time, including pressure from wind energy development. They welcome the proposal to designate part of the AONB as a SCA. However, they have concerns that, by implication, protection for the remaining parts of the AONB may be diminished.
- HED state that protection of the unique landscape setting of Slemish is desirable and both HED and the Historic Monuments Council recommend that Knockdhu ASAI would benefit from additional policy protection. HED indicated that Knockdhu ASAI has strong tourism potential as part of the Ulster Way.
- ABO Wind NI Ltd and RES Ltd were unsupportive of the preferred option because of their overriding aims to further promote renewable energy. Justification for this position was the importance attached to renewable energy projects in mitigating against climate change, for producing

clean competitively-price energy ensuring security of energy supply, and in attracting inward investment. It was suggested that robust assessments of proposals should be done on a case-by-case basis against current regional planning policy.

- RES Ltd expressed concern that areas of constraint on wind turbines in areas considered to be sensitive could significantly reduce the likelihood of viable wind farms coming forward, particularly if these designations include upland areas.

Our consideration

- We welcome the strong support given to the preferred option.
- We recognise the importance of the renewable energy and minerals development sectors to the NI economy and will give due consideration to this when considering the designation of any potential spatial policy areas within the AONB.
- We note the support for the preferred option for Key Issue 23, which favoured a policy based cautious approach within designated landscapes generally.
- Potential designations will be informed by further study, including ongoing engagement with relevant statutory consultees. We will also take account of the comments received in response to this consultation.

Key Issue 34 Areas of Scenic Quality

Our Preferred Option

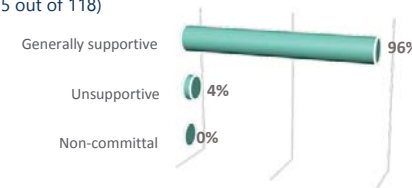
Retain the existing designated Areas of High Scenic Value and associated policy and designate other areas within the Borough as Areas of High Scenic Value if considered appropriate.

Our alternative options were to retain the existing Areas of High Scenic Value and associated policy or remove these designations and rely on carried forward regional policies (such as PPS 2, PPS 18 and PPS 21) for protection of the natural environment.

Your response

Public responses

(Response rate: 21% - 25 out of 118)



- The majority of respondents were supportive of the preferred option.
- It was highlighted that these areas need protection from the adverse impacts of inappropriate development and the cumulative impacts of development.
- Perceived threats to the landscape character of these sensitive areas include wind turbines, tall utilities infrastructure, large scale solar projects and industrial structures.
- It was recognised that these areas can contain sites or features of nature conservation value and the scenic quality of these sites can create a sense of place and contribute to tourism in the Borough.

Statutory Consultee responses

- Statutory consultees were generally supportive or neutral in response to the preferred option.
- NIEA state that any appropriate designation and policy would require further consideration and

clarification and indicate that existing AOHSV boundaries may need reviewed.

- DfI stated that the preferred option is in line with the SPPS.

- A representation from the energy sector was unsupportive of the preferred option, but did not provide a justification for this position.

Our consideration

- We welcome the strong support given to the preferred option to support the retention of AOHSV and to consider further AOHSV designations if appropriate.
- We will review the boundaries of existing AOHSV and assess other Areas of Scenic Quality and ensure that any new or amended designations and associated policy are informed by further study, including ongoing engagement with relevant statutory consultees. We will also take account of the comments received in response to this consultation.

Key Issue 35 Local Landscape Policy Areas



Our Preferred Option

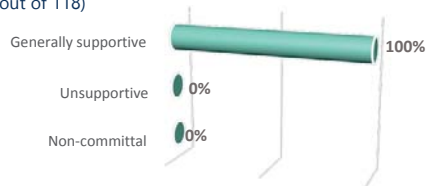
Retain the existing designated Local Landscape Policy Areas and associated policy designate other Local Landscape Policy Areas where considered appropriate.

Our alternative options were to retain the existing Local Landscape Policy Areas and associated policy or remove these designations and rely on carried forward regional policies (such as PPS 2, PPS 18 and PPS 21) for protection of environmental and heritage features.

Your response

Public responses

(Response rate: 20% -24 out of 118)



- All of the respondents who expressed an opinion were supportive of the preferred option.
- It is recognised that these areas contribute to a sense of place, may contain natural heritage assets, often provide blue and green infrastructure and can enhance biodiversity.
- Some perceived threats to these areas include wind turbines, inappropriate development such as large scale commercial/industrial development and the cumulative impacts of development.
- Whilst supportive, some respondents stated that it would

be prudent to review existing LLPAs, particularly where there is existing industry.

- One respondent suggested that within settlements regional planning policy is sufficient to ensure sympathetic development.

Statutory Consultee responses

- Generally, statutory consultees were supportive of the preferred option as a positive policy tool to identify and protect these areas.
- NIEA suggest that the boundaries of existing LLPAs may need to be reviewed.
- HED considered it important to demonstrate how historic environment evidence has been taken into account in informing appropriate designations.

- A representation from the energy sector was unsupportive of the preferred option, but did not provide a justification for this position.

Our consideration

- We welcome the strong support given to the preferred option to support the identification and designation of areas within and/or adjoining settlements that are of greatest amenity value, landscape quality or local significance.
- We will review the boundaries of existing LLPAs and assess other areas within and/or adjoining settlements and ensure that any new or amended LLPAs and associated policy are informed by further study, including ongoing engagement with relevant statutory consultees. We will also take account of the comments received in response to this consultation.

Key Issue 36 Landscape Wedges



Our Preferred Option

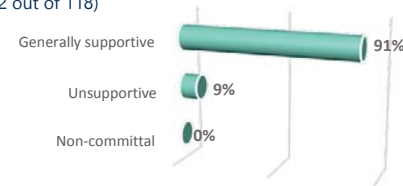
Retain the existing designated Rural Landscape Wedges and associated policy and designate other Rural Landscape Wedges where considered appropriate.

Our alternative options were to retain the existing Rural Landscape Wedges and associated policy or remove these designations and rely on carried forward regional policies (such as PPS 2, PPS 18 and PPS 21) to protect the setting of settlements.

Your response

Public responses

(Response rate: 19% - 22 out of 118)



- The majority of respondents who expressed an opinion were supportive of the preferred option.
- It was highlighted that these areas contribute to a sense of place.
- RSPB stressed that these areas can provide important wildlife corridors and link up with other areas important for biodiversity.
- 64% of public respondents were of the opinion that there are no areas outside of existing Rural Landscape Wedges that should be considered for designation. Although areas around the settlements of Broughshane, Carrickfergus and Larne were suggested for designation, the support for additional Rural Landscape Wedge designations was weak.
- 75% of public respondents did not consider there to be areas within our settlements that could perform the strategic function of an Urban Landscape Wedge. Although Bashford Island Wood and areas within Ballymena and Broughshane were put forward for designation, support for the introduction of Urban Landscape Wedge designations was weak.

Statutory Consultee responses

- Statutory consultees were generally supportive of the preferred option, recognising that these designations aim to protect the rural character of the countryside and maintain the visual separation between settlements.
- NIEA suggest that the boundaries of existing Rural Landscape Wedges may need reviewed.
- None of the statutory consultees who responded expressed an opinion that there are areas, over and above the existing Rural Landscape Wedges, that should be considered.
- None of the statutory consultees who responded expressed an opinion that there are areas that should be considered for Urban Landscape Wedge designation. However, NIEA were supportive of the principle of designating Urban Landscape Wedges.

Our consideration

- We welcome the strong support given to the preferred option to support the retention of existing Rural Landscape Wedges and will take due regard of the weak response to identifying other areas for potential designation.
- We will take due regard of the weak response to identifying areas for potential Urban Landscape Wedge designation in considering whether to bring forward such designations in the emerging Plan Strategy.

11.0

Existing Planning Policy Review

Chapter 11 of the POP contained a review of the full suite of Planning Policy Statements (PPS) in the form of a table.

With regard to each PPS, column 1 of the table provided the title of the operational policy and summarised its nature and intent.

Column 2 then set out how the corresponding policy was dealt with by the Strategic Planning Policy Statement (SPPS) and highlighted in particular any change in policy direction or emphasis.

Column 3 (Comment) set out the broad recommendations of Council as to how each PPS policy is likely to be addressed in moving forward with developing the draft Plan Strategy.

This table is replicated in this Report with an additional column (Responses and Post Consultation Consideration) inserted to highlight the main issues arising from public responses to the policy related questions in the POP and the Council's consideration of the responses. Again this will not be binding on future decision making.



Current Operational Policy

PPS 2: Natural Heritage
<p>Policy NH 1: European and Ramsar Sites – International</p> <p>Under Policy NH 1, planning permission will only be granted for a development proposal that is not likely to have a significant effect on a European or Ramsar site. Where a development proposal is likely to have a significant individual or cumulative effect, an appropriate assessment needs to be carried out by the planning authority. Mitigation measures in the form of planning conditions may be imposed.</p> <p>Where a development proposal could adversely affect the integrity of a European or Ramsar site, development may only be permitted in exceptional circumstances where it is required for imperative reasons of overriding public interest and subject to other stringent tests.</p>
<p>Policy NH 2: Species Protected by Law</p> <p>Under Policy NH 2, planning permission will only be granted for a development proposal that is not likely to harm a European protected species (listed under Annex IV of the Habitats Directive). In exceptional circumstances a development proposal that is likely to harm these species may only be permitted if it meets the 4 specified criteria.</p> <p>Under Policy NH 2 planning permission will only be granted for a development proposal that is not likely to harm any other statutorily protected species (including national) and which can be adequately mitigated or compensated against.</p>
<p>Policy NH 3: Sites for Nature Conservation Importance – National</p> <p>Under Policy NH 3, planning permission will only be granted for a development proposal that is not likely to have an adverse effect on the integrity, including the value of the site to the habitat network, or special interest of a site of national nature conservation importance.</p> <p>Development proposals which could adversely affect a site of national nature conservation importance may only be permitted where the benefits of the proposed development clearly outweigh the value of the site.</p>
<p>Policy NH 4: Sites for Nature Conservation Importance – Local</p> <p>Under Policy NH 4, planning permission will only be granted for a development proposal that is not likely to have a significant adverse impact on a site of local nature conservation importance.</p>

Strategic Planning Policy Statement

SPPS
<p>SPPS (para 6.176, 6.177, 6.178) accords with Policy NH 1 in regard to assessing proposals that may impact on European or Ramsar sites.</p> <p>SPPS does not set out exceptions but refers to these in the relevant statutory provisions.</p>
<p>SPPS (para 6.180, 6.181, 6.182) accords with Policy NH 2.</p> <p>SPPS (para 6.179) sets out guidance on the actions that must be carried out by the planning authority in order to inform decision making on a development proposal.</p>
<p>SPPS (para 6.183, 6.184) accords with Policy NH 3.</p> <p>SPPS (para 6.183) states that, “There is a legal duty to take reasonable steps to further the conservation and enhancement of the features by which the ASSI is of special scientific interest.”</p> <p>In the SPPS (para 6.183) Marine Conservation Zones (MCZs) replace Marine Nature Reserves (MNRs) in the list of National Sites of Nature Conservation Importance, in accordance with the Marine Act (NI) 2013.</p>
<p>SPPS (para 6.190) accords with Policy NH 4.</p> <p>It is noted that neither the SPPS nor Policy NH 4 make reference to the designation of Sites of Local Nature Conservation Importance through the LDP.</p>

POP Recommendation/Comment
<p>Policy NH 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p><i>It is recommended that the wording of Policy NH 1 is brought forward in the LDP Plan Strategy with a minor amendment to bring forward the stronger wording used in SPPS (para 6.177), in regard to the requirement by law for the Planning Authority to carry out an appropriate assessment in cases where a development proposal is likely to have a significant effect on an international site or where there is reasonable scientific doubt.</i></p>
<p>Policy NH 2 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p><i>It is recommended that the wording of Policy NH 2 is brought forward in the LDP Plan Strategy, with wording amended as necessary to reflect the SPPS (para 6.179).</i></p>
<p>Policy NH 3 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p><i>It is recommended that the wording of Policy NH 3 is brought forward in the LDP Plan Strategy, with wording amended as necessary to align more closely with SPPS.</i></p> <p><i>MCZs will substitute MNRs in the list of National Sites of Nature Conservation Importance in accordance with the Marine Act (NI) 2013.</i></p>
<p>Policy NH 4 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p><i>It is recommended that the wording of Policy NH 4 is brought forward in the LDP Plan Strategy.</i></p> <p><i>BMAP 2015 designated Sites of Local Nature</i></p>

Responses and Post Consultation Consideration (see Chapter 10)
<p>Broad support for Council's approach to reviewing and bringing forward policies contained within PPS 2.</p> <p>In a general comment, DfI highlighted the “precautionary principle” and stated that Council must ensure they take account of policy in relation to natural heritage detailed in paragraphs 6.172 - 6.198 of the SPPS.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Broad support for Council's approach to reviewing and bringing forward policies contained within PPS 2.</p> <p>In response to, PPS 8 policies OS 3: Outdoor Recreation in the Countryside and OS 7: The Floodlighting of Sports and Outdoor Recreational Facilities, NIEA requested that the impact of floodlighting on bats is highlighted.</p> <p>Post consultation consideration <i>Bring forward POP recommendation and include reference to the impact of floodlighting on bats in amplification text.</i></p>
<p>Broad support for Council's approach to reviewing and bringing forward policies contained within PPS 2.</p> <p>NIEA welcome the substitution of MNRs with MCZs in the list of National Sites of Nature Conservation Importance.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Broad support for Council's approach to reviewing and bringing forward policies contained within PPS 2.</p> <p>Post consultation consideration <i>Bring forward POP recommendation with amendments to reflect the wording of SPPS.</i></p>

Development proposals which could have a significant adverse impact on a site of local importance may only be permitted where the benefits of the proposed development outweigh the value of the site.

Policy NH 5: Habitats, Species or Features of Natural Heritage Importance

Under Policy NH 5, planning permission will only be granted for a development proposal which is not likely to result in the unacceptable adverse impact on, or damage to, known habitats, species or features of natural heritage importance listed under this policy.

Development proposals which are likely to result in an unacceptable adverse impact may only be permitted where the benefits of the proposed development outweigh the value of the habitat, species or feature.

SPPS (para 6.192, 6.193) accords with Policy NH 5.

SPPS (para 6.192) explicitly states that other natural heritage features worthy of protection include "trees and woodland".

Conservation Importance (SLNCIs) within the former Carrickfergus Borough. There are no designated SLNCIs within the former Ballymena and Larne Boroughs due to the age of their plans. The issue of ensuring a consistent approach across the Borough will be addressed through the POP. Environmental consultees have indicated that the features of nature conservation interest within existing SLNCIs can be sufficiently protected under Policy NH 5.

Policy NH 5 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. Environmental consultees have stressed the importance of protecting trees and woodland.

It is recommended that the wording of Policy NH 5 is brought forward in the LDP Plan Strategy, and that the following natural heritage features which are of particular importance in Mid and East Antrim, be added to the list brought forward with Policy NH 5:

- Significant groups of trees and woodland
- Species-rich grasslands
- Green and Blue Infrastructure
- Undeveloped Coastal areas

Broad support for Council's approach to reviewing and bringing forward policies contained within PPS 2.

Additional Features

There was strong support for including the proposed additional features to be listed for protection under Policy NH 5.

NIEA welcomed the addition of "trees and woodland", however, they highlighted the following issues:

- unsure of the definition of "species-rich grasslands" as it differs to the grassland priority habitats. They stress that if an additional category is being considered, it is advisable for Council to review the Habitat Action Plans (HAPS) to ensure there is no or little overlap with existing categories and to provide an equivalent level of detail at species level to support this category;
- note that "green and blue infrastructure" can include manmade infrastructure, and stress that it will be important to provide a definition of what features this category will protect; and
- further consideration should be given to what features the "Undeveloped Coastal Areas" category is considering to protect as there is likely to be significant overlap with this category and priority habitats.

SLNCIs

The majority of respondents agreed that sites containing features of local nature conservation importance and not designated in our LDP, can be afforded sufficient protection under Policy NH 5.

NIEA stated that the policy approach within Policy NH 5 would be sufficient to consider natural heritage interest of local sites if they are identified. They stressed that it is therefore likely to be highly beneficial to identify these areas within the LDP in a consistent manner to allow for this policy

Policy NH 6: Areas of Outstanding Natural Beauty

Under Policy NH 6, planning permission for new development within an AONB will only be granted where it is of an appropriate design, size and scale for the locality and where additional tests are met in regard to respecting the special character of the AONB and the conservation of its heritage assets.

SPPS generally accords with Policy NH 6 and reflects the guidance therein.

Policy NH 6 essentially seeks to regulate the siting, scale and design of new development within AONBs, and the retention of natural and man-made features that characterise the particular AONB. It is considered that the greater level of detail (compared to SPPS) referred to under Policy NH 6 is advantageous, in that it identifies the key characteristics to be taken in to account in assessing proposals for new development within AONBs. It is therefore recommended that the wording of Policy NH 6 is brought forward in the LDP Plan Strategy.

Consultees raised concerns about the cumulative impacts of development within the Antrim Coast and Glens AONB. Policy NH 6 may not be robust enough to protect against the cumulative impacts of development, particularly certain types of development, in highly visually sensitive areas within the AONB. SPPS (para 6.188) explicitly states that “cumulative impacts” are a material consideration when assessing development proposals, and as such this wording would strengthen Policy NH 6 in regard to mitigating against the harmful impacts of cumulative development on the special character of the AONB. Therefore, it is recommended to bring forward the wording of SPPS (para 6.188).

Key Issue 33 addresses the protection of the special character and environment of the AONB and considers the visual sensitivity of some areas

approach. They also highlighted that they have identified local wildlife sites which could be used as a basis for SLNCI designation.

Post consultation consideration

Bring forward wording of Policy NH 5 in Plan Strategy with the potential addition of the following categories:

- Trees and woodland of significant amenity value; and
- Green and Blue Infrastructure.

We will engage in further consultation with DfI and NIEA to clarify and define features to be addressed under the “Green and Blue Infrastructure” category.

Taking account comments received from NIEA, Council will not bring forward the categories “Species-rich grasslands” and “Undeveloped Coastal areas”.

We will engage in further consultation with NIEA regarding the identification and designation of SLNCIs.

Broad support for Council’s approach to reviewing and bringing forward policies contained within PPS 2.

NIEA welcomed the proposal to include an assessment of the cumulative impacts of development within Policy NH 6. However, they are concerned that it is only proposed to do this for “certain types of development” in “highly sensitive areas within the AONB”. They indicated that this approach suggests there are areas of greater and lesser importance within the AONB, which consequently, could diminish protection of some areas within the AONB. They advocate that the whole of the AONB should be assessed.

NIEA stated that SCA designations will require specific policy to be brought forward in line with the requirements of the SPPS and Policy CTY 1 of PPS 21.

Post consultation consideration

Bring forward POP recommendation. (see Key Issues 26, 29 and 33 for reference to issues that may require amendments to this policy in respect of any potential spatial designations within the AONB).

of the AONB to the cumulative impacts of development, particularly in regard to highly obtrusive forms of development. The Preferred Option is to bring forward Areas of Constraint on particular types of development within the AONB, and to consult on where any Special Countryside Area (SCA) designation would be appropriate within the AONB.

It is recommended that the wording of Policy NH 6 is brought forward in the LDP Plan Strategy with amendments to recognise any spatial designation of Areas of Constraint and further SCAs that may be introduced through the LDP.

PPS 3: Access, Movement and Parking	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 8)
<p>Policy AMP 1: Creating an Accessible Environment</p> <p>Aims to create a more accessible environment for everyone. It outlines criteria for the external layout of development proposals required to ensure the specific needs of people with disabilities or impaired mobility are met.</p>	<p>SPPS is less detailed than Policy AMP 1. However one of its regional strategic objectives (para 6.297) for transportation and land use planning directly addresses the thrust of Policy AMP 1.</p>	<p>Policy AMP 1 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p><i>It is recommended that the wording of Policy AMP 1 is brought forward in the LDP Plan Strategy.</i></p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Policy AMP 2: Access to Public Roads</p> <p>States that permission will only be granted for a development proposal involving direct access, or the intensification of the use of an existing access, onto a public road where it does not prejudice road safety or significantly inconvenience the flow of traffic, or conflict with Policy AMP 3.</p> <p>It also outlines factors that will be considered in relation to the accessibility of access arrangements, including the number of access points onto the public road.</p>	<p>SPPS, although less detailed than Policy AMP 2, accords with it.</p>	<p>Policy AMP 2 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p><i>It is recommended that the wording of Policy AMP 2 is brought forward in the LDP Plan Strategy.</i></p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration <i>Bring forward POP recommendation</i></p>
<p>Policy AMP 3: Access to Protected Routes</p> <p>Superseded by PPS 3 Access Movement and Parking clarification of Policy AMP 3: Access to Protected Routes (October 2006)</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Clarification on AMP 3 Access to Protected Routes</p> <p>This policy restricts the number of new accesses and controls the level of use of existing accesses onto Protected Routes.</p> <p>The policy is broken into three sections dealing with protected routes, protected routes outside settlement limits and protected routes within settlement limits and outlines exceptional circumstances within each section.</p> <p>Annex 1 of PPS 21 also includes a consequential revision to Policy AMP 3 of PPS 3.</p> <p>This revision removed the word 'direct' from proposals involving access on to a Protected Route and clarified that where access could not reasonably be obtained from an adjacent minor road, then proposals will be required to make use of an existing access on to the Protected Route.</p>	<p>SPPS (para 6.301) accords with Policy AMP 3.</p> <p>SPPS also states that LDPs may contain additional local policies in order to apply further restrictions, usually for road safety or traffic flow reasons.</p> <p>SPPS (para 6.301) reiterates the wording of this consequential revision to Policy AMP 3 of PPS 3.</p>	<p>Policy AMP 3 appears to be generally working well. However evidence suggests consideration should be given to amending the wording of Policy AMP 3 in the LDP Plan Strategy.</p> <p>The following points have been raised:</p> <ul style="list-style-type: none"> - Consideration be given to adding to the list of exceptional circumstances to include direct access on to a protected route for major economic development zonings where there is no reasonable alternative access, or for facilities that would reduce congestion (e.g. Park and Rides sites). - That the wording of (b) 'Other Protected Routes - within Settlement Limits' should be amended to remove the wording 'or resulting in an unacceptable proliferation of access points', so as to afford more weight for design and regeneration considerations. <p><i>It is recommended that amended wording of Policy AMP 3 is brought forward in the LDP Plan Strategy.</i></p>	<p>Broad support for the Council's approach to Policy AMP 3.</p> <p>DfI Roads expressed opposition to any additions to the list of exceptions provided in AMP 3 and requested further discussions with LDP team on this and any amendments to wording of (b).</p> <p>A public respondent also suggested additional criteria that may be beneficial in specific cases.</p> <p>Post consultation consideration <i>Discuss further with DfI Roads before considering whether to bring forward POP recommendation or not.</i></p>

Policy AMP 4: Protection for New Transport Schemes

Policy AMP 4 does not permit development that would prejudice the implementation of transport schemes identified in a development plan. This policy offers protection for land needed to facilitate new transport schemes such as road schemes, improvements to pedestrian or cycle networks or a public transport scheme and associated facilities.

Policy AMP 5: Disused Transport Routes

Policy AMP 5 does not permit development that would prejudice the future re-use of a disused transport route identified in a Development Plan for transport or recreational purposes.

Policy AMP 6: Transport Assessment

Policy AMP 6 requires, where appropriate, developers to submit a Transport Assessment in order to evaluate the transport implications of a development proposal.

Policy AMP 7: Car Parking and Servicing Arrangements

Requires development proposals to provide adequate car parking and appropriate servicing arrangements. The precise amount of car parking will depend on the characteristics of the development and its location, having regard to the Departments published standards.

The policy details circumstances where a reduced level of parking in all new developments may be acceptable within an area designated in a development plan. These areas are referred to as 'areas of parking restraint'.

Policy AMP 7 also states that a proportion of the required spaces are to be for people with disabilities in accordance with best practice. Where a reduced level of parking is applied, this will not normally apply to the number of reserved spaces to be provided.

SPPS (para 6.301) accords with Policy AMP 4 and states that LDPs should identify and safeguard land required to facilitate new transport schemes or planned improvements to the transport network.

SPPS (para 6.301) accords with Policy AMP 5 and states that LDPs should identify and safeguard disused transport routes where there is reasonable prospect of re-use for future transport purposes, or protect them in the Plan for alternative purposes such as a recreational, nature conservation or tourism related use.

SPPS also highlights (para 6.210) the importance of protecting linear open spaces such as pedestrian and cycle routes, community greenways, former railway lines and river and canal corridors many of which are valuable in linking larger areas of open space and providing important wildlife corridors/ecological networks.

SPPS (para 6.303) accords with Policy AMP 6 and requires developers to submit a Transport Assessment for development proposals likely to generate a significant volume of traffic.

SPPS is less detailed than Policy AMP 7, but accords with it.

Policy AMP 4 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy AMP 4 is brought forward in the LDP Plan Strategy.

Policy AMP 5 appears to be generally working well, however evidence suggests consideration should be given to amending the wording of Policy AMP5 in the LDP Plan Strategy to take into consideration the SPPS particularly in reference to Greenways.

Key Issue 17 considers the issue of Greenways, it is proposed to add wording to Policy AMP 5 to allow for the protection of designated community greenways/pathways, including those designated by other bodies.

It is recommended that the wording of Policy AMP 5 is expanded upon to reflect Greenways as well as the wider purposes stated in the SPPS.

Policy AMP 6 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy AMP 6 is brought forward in the LDP Plan Strategy.

Policy AMP 7 appears to be working well and there is no evidence to suggest that it needs to be amended. However, it may be prudent to consider combining this policy with other car parking policies in bringing forward the LDP.

Further, Key Issue 21 considers whether or not Areas of Parking Restraint should be designated in main towns through the LDP.

Accordingly, it is recommended that the wording of this aspect of the policy is reviewed at LDP Plan Strategy stage, pending the outcome of public consultation on the POP.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation

Strong support for the Councils approach to expand wording of AMP 5 to take into consideration Greenways.

NIEA supported the amendments.

DfI TPMU supported expanding the wording of AMP 5, suggested additional wording and offered to hold further discussion with the LDP team.

DfI Planning advised that the LDP should take into account the importance of protecting linear open spaces such as pedestrian and cycle routes, community greenways and amongst others, former railway lines.

Post consultation consideration
Discuss further with DfI TPMU before bringing forward POP recommendation.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation.

DfI Roads offer to discuss any potential amendments with the Council prior to the Plan Strategy.

No other comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Discuss further with DfI Roads before bringing forward POP recommendation.

Policy AMP 8: Cycle Provision

Policy AMP 8 seeks to ensure that development proposals providing jobs, shopping, leisure and services, including educational and community uses will only be granted planning permission where the needs of cyclists are taken into account.

SPPS (para 6.297) promotes the provision of adequate facilities for cyclists in new development. It is less detailed in the criteria to be adhered to, however, it generally accords with Policy AMP 8.

Policy AMP 8 appears to be working well, however evidence suggests consideration should be given to amending the wording of Policy AMP 8 in the LDP Plan Strategy to include all new development (not only development providing jobs, shopping, leisure and services, educational and community uses) and to also add criteria in relation to Greenways.

[It is recommended that updated wording of Policy AMP 8 is brought forward in the LDP Plan Strategy.](#)

Strong support for the Council's approach to expand wording of AMP 8 to include all new development and to also add criteria in relation to Greenways.

NIEA supported the amendments.

DfI TPMU supported expanding the wording of AMP 8 and suggested additional wording and offered to hold further discussion with the Plan team.

Post consultation consideration

[Discuss further with DfI TPMU before bringing forward POP recommendation.](#)

Policy AMP 9: Design of Car Parking

Policy AMP 9 outlines criteria required to secure a high standard of design layout and landscaping for car parking proposals. These include respecting the character of the local townscape/landscape, visual amenity and providing security including direct and safe access for pedestrians and cyclists.

SPPS does not specifically refer to the design of car parking.

Policy AMP 9 appears to be working well and there is no evidence to suggest that it needs to be amended.

[It is recommended that the wording of Policy AMP 9 is brought forward in the LDP Plan Strategy.](#) It may be prudent to consider combining this policy with other car parking policies in bringing forward the LDP.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration

[Bring forward POP recommendation.](#)

Policy AMP 10: Provision of Public and Private Car Parks

Policy AMP 10 outlines criteria that must be demonstrated to gain planning permission for development or extension of public or private car parks, including park and ride and park and share.

Criteria include impact on congestion and local environmental quality, meets an identified need, and is compatible with adjoining land uses.

SPPS generally accords with AMP 10, although it adds (para 6.305) that the planning authority should be supported by a need for the development by reference to the council's overall car parking strategy, following a robust analysis by the applicant, and in consultation with the Department for Infrastructure.

In addition, the SPPS recommends a Plan-led approach to the identification and protection of existing and proposed town centre car parks (para 6.301).

Policy AMP 10 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

[It is recommended to bring forward the wording of Policy AMP 10 in the LDP but updated to align with the SPPS in relation to the Council's car parking strategy and the recommended Plan-led approach in regard to town centre car parking.](#) It may be prudent to consider combining this policy with other car parking policies in bringing forward the LDP.

Strong support for the Council's approach to AMP 10 to ensure the protection and provision of car parks.

Translink await the outcome of Council's Car Parking Strategy and the impact it will have on general traffic demand as well as future edge of town P&R Facilities.

DfI Roads offer to discuss any potential amendments with the Council prior to the Plan Strategy.

Post consultation consideration

[Discuss further with DfI Roads and review Council's Car Parking Strategy before bringing forward POP recommendation.](#)

Policy AMP 11: Temporary Car Parks

States that planning permission for a temporary car park will not be granted unless it complies with Policy AMP 10 and the developer can show that a need exists which cannot be met in the short term by the Planning Authority or the private sector.

Applications will also have to be submitted in conjunction with programmed proposals to develop/redevelop the site in question. Planning permission will be subject to a time-limited condition for a period of 1 year.

There is no provision for temporary car parks in SPPS.

Policy AMP 11 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

It is recommended extending the time limit from a period of 1 year (which will not normally be renewed) to 'a maximum period of 2 years which will not be renewed'. It is considered this would be more realistic in enabling the use of the site as a car park for the temporary period, whilst providing more certainty for the longer term use of the site.

[It is recommended that the updated wording of Policy AMP 11 is brought forward in the LDP Plan Strategy.](#) It may also be prudent to consider combining this policy with Policy AMP 10 in bringing forward the LDP Plan Strategy.

Strong support for the Council's approach to AMP 11 to ensure the protection and provision of car parks.

Translink await the outcome of Council's Car Parking Strategy and the impact it will have on general traffic demand as well as future edge of town P&R Facilities.

DfI Roads offer to discuss any potential amendments with the Council prior to the Plan Strategy.

Post consultation consideration

[Discuss further with DfI Roads before bringing forward POP recommendation.](#)

PPS 4: Planning and Economic Development	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 6)
<p>Policy PED 1: Economic Development in Settlements</p> <p>Outlines the types of B Class Business uses which are allowed for economic development within cities, towns, villages and smaller rural settlements. This policy seeks to concentrate employment and services associated with this type of development within the main hubs, and for B1 uses more specifically within town centres.</p>	<p>SPPS generally accords with Policy PED 1 and states that Class B1 business uses in larger settlements should be permitted within town centres or in other areas specified for such use in the LDP (para 6.85).</p>	<p>Policy PED 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>Key Issue 6 considers the location of Class B1 Business Use. The preferred option allows for Class B1 Business Uses within town centres, district or local centres as well as economic development land (or identified parts thereof) as part of a sequential approach.</p> <p><i>It is recommended that the updated wording of Policy PED 1 is brought forward in the LDP Plan Strategy.</i></p>	<p>Broad support for the Council's approach to Policy PED 1.</p> <p>Invest NI was supportive of Key Issue 6 preferred option.</p> <p>Numerous respondents endorsed the sequential approach to ensure that town centres are always considered as the first option, as this will drive footfall and also provides the necessary flexibility for Class B1 investors.</p> <p>Translink raised concerns regarding including economic zonings in the sequential approach due to accessibility.</p> <p>DfI Planning also requested clarification on rationale for including economic zonings.</p> <p>Post consultation consideration <i>Discuss further with DfI Planning before bringing forward POP recommendation.</i></p>
<p>Policy PED 2: Economic Development in the Countryside</p> <p>This is a directional policy that signposts other policies in the PPS which provide opportunity for economic development in the countryside.</p> <p>This policy also outlines that any economic development associated with farm diversification schemes and proposals involving the re-use of rural buildings will be assessed under the provisions of PPS 21 'Sustainable Development in the Countryside'. All other proposals for economic development in the countryside will only be permitted in exceptional circumstances.</p>	<p>SPPS (para 6.87) accords with Policy PED 2.</p>	<p>As a directional policy, Policy PED 2 does not need to be amended.</p> <p><i>It is recommended that the wording of Policy PED 2 is brought forward in the LDP Plan Strategy.</i></p>	<p>No comments received from statutory consultees to this policy, however some public respondents stated the need to be more flexible in relation to start-up and grow-on business developments associated with agri-food production, particularly in the countryside, where thriving rural businesses should be nurtured and helped to remain in situ.</p> <p>Others stated there should be a relaxation of planning policy in the countryside for small businesses.</p> <p>Post consultation consideration <i>While, it is considered there remains sufficient opportunities for appropriate economic development in the countryside as outlined in the SPPS, this policy will be further considered in light of Council's emerging Integrated Economic Development Strategy.</i></p>
<p>Policy PED 3: Expansion of an Established Economic Development Use in the Countryside</p> <p>States that proposals for the expansion of an Established Economic Development Use in the Countryside will be permitted where it does not harm the rural character of the area and there is no major increase in the site area of the enterprise.</p>	<p>SPPS is less detailed than Policy PED 3 in the criteria to be adhered to, however, it generally accords with Policy PED 3.</p> <p>SPPS (para 6.87) supports rural economic development of an appropriate nature and scale and states that farm diversification, the re-use of rural buildings, and appropriate redevelopment</p>	<p>Policy PED 3 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p><i>It is recommended that the wording of Policy PED 3 is brought forward in the LDP Plan Strategy.</i></p>	<p>No comments received from statutory consultees to this policy, however some public respondents stated the need to be more flexible in relation to start-up and grow-on business developments associated with agri-food production, particularly in the countryside, where thriving rural businesses should be nurtured and helped to remain in</p>

<p>Proposals for extension will normally be expected to reuse or extend existing buildings on site. Where it is demonstrated that this is not possible, new buildings may be permitted provided they are in proportion and integrate as part of the overall development.</p> <p>Exceptional circumstances are also outlined including where the proposal would make a significant contribution to local economy, or where relocation is not operationally possible.</p>	<p>and expansion proposals for industrial and business purposes normally offer the greatest scope for sustainable economic development in the countryside.</p>		<p>situ.</p> <p>Others stated there should be a relaxation of planning policy in the countryside for small businesses.</p> <p>Post consultation consideration While, it is considered there remains sufficient opportunities for appropriate economic development in the countryside as outlined in the SPPS, this policy will be further considered in light of Council's emerging Integrated Economic Development Strategy.</p>
<p>Policy PED 4: Redevelopment of an Established Economic Development Use in the Countryside</p> <p>Sets out criteria for the redevelopment of an established economic development use in the countryside for industrial or business purposes.</p> <p>It also includes criteria relating to storage and distribution uses.</p> <p>This policy also facilitates proposals for the redevelopment of rural economic development sites for tourism, outdoor sport and recreation or local community facilities where the policy criteria can be met and where the proposal does not involve land forming all or a substantial part of an existing industrial estate.</p> <p>The policy also notes that retail will not be permitted.</p> <p>Exceptionally proposals for social and affordable housing may be permitted on former industrial sites that cannot realistically be redeveloped for industry, provided they meet the policy provisions of PPS 21.</p>	<p>SPPS is less detailed than Policy PED 4, however, the thrust of the SPPS accords with Policy PED 4.</p>	<p>Policy PED 4 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p>It is recommended that the wording of Policy PED 4 is brought forward in the LDP Plan Strategy.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation</p>
<p>Policy PED 5: Major Industrial Development in the Countryside</p> <p>Sets out criteria for Major Industrial Development proposals in the Countryside, which make a significant contribution to the regional economy. The policy also suggests that edge of town locations will be favoured over a location elsewhere in the rural area.</p>	<p>SPPS is less detailed than Policy PED 5, however it accords with it.</p> <p>SPPS (para 6.88) also favours an edge of settlement location where there is no suitable site within the settlement; or where a major or regionally significant proposal is required to be in the countryside.</p>	<p>Policy PED 5 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p>It is recommended that the wording of Policy PED 5 is brought forward in the LDP Plan Strategy.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>
<p>Policy PED 6: Small Rural Projects</p> <p>Sets out criteria based policy for a small community enterprise park/centre or a small rural industrial enterprise on land outside a village or smaller rural settlement.</p> <p>Subsequent proposals should be sited to cluster or visually link to this, subject to amenity and environmental considerations. Policy states that storage or distribution uses will only be permitted where these are clearly ancillary to a proposal for a community enterprise park/centre or an industrial use.</p>	<p>SPPS is less detailed than Policy PED 6, however it accords with Policy PED 6.</p>	<p>Policy PED 6 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p>It is recommended that the wording of Policy PED 6 is brought forward in the LDP Plan Strategy.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation</p>

Policy PED 7: Retention of Zoned Land and Economic Development Uses

Sets out a general presumption against the loss of land for economic development, unless the land has been substantially developed for alternative uses.

The policy also provides for '*sui generis*' employment uses within zonings, subject to these being compatible with the predominant use and to other normal planning considerations. Retailing and commercial leisure development is specifically excluded, except where ancillary to the economic development use.

The policy also applies the same general presumption to unzoned land in economic development use in settlements (or land last used for this purpose) as detailed in a subsequent clarification to the policy. The policy sets out a list of detailed criteria to be met before a proposal for an alternative use on such land can be permitted and there is also provision for compatible '*sui generis*' uses.

The Department issued further guidance on the implementation of this policy in November 2015 which largely reflects the policy position of the SPPS (column 2 refers).

Clarification of Policy PED 7: Retention of Zoned Land and Economic Development Uses (2011)

This clarified that even if zoned or unzoned economic development land is cleared, the presumption for future economic development use remains.

SPPS confirms the presumption set out in PPS 4 against the loss of economic development land for alternative uses (para 6.89).

In the case of zoned land, the only provision for alternative use is when a developer can clearly demonstrate how the special circumstances of a particular case outweigh the preferred option of retaining land for economic development use.

In the case of unzoned land in economic development use (or last used for these purposes), neither the guidance nor the SPPS repeats the detailed criteria set out in Policy PED 7 of PPS 4. Instead it provides planning authorities with the flexibility to consider alternative proposals that offer community, environmental or other benefits that are considered to outweigh the loss of land for economic development use.

There are no specific references to '*sui generis*' uses or to the exclusion of retailing and commercial leisure development.

SPPS (para 6.89) reiterates the importance that land last used for economic development purposes should be retained for economic development use.

SPPS (para 6.90) accords with Policy PED 8.

Policy PED 7 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

However, it is recommended that the policy is amended to align more closely with SPPS and that the detailed criteria relating to unzoned land be removed and included as policy guidance.

Further to Key Issue 8, it is proposed subject to the outcome of public consultation to make provision, by way of exception, for compatible '*sui generis*' uses on economic development land and to state what these uses would include.

It is also recommended to reiterate the Policy PED 7 presumption against retail and commercial leisure development.

Policy PED 8 appears to be working well and there is no evidence to suggest that it needs to be amended.

Taking account of Key Issue 8, it is recommended that the wording of Policy PED 8 is brought forward in the LDP Plan Strategy.

General support for Council's suggested amendments to the policy approach to PED 7.

NIHE suggest that under any revised policy consideration should be given to the provision of social housing and the substantial community benefit that outweighs the loss of economic land.

DfI Planning outlined its concerns with compatibility of the proposed uses such as 'sale and display for sale of motor vehicles' and 'a scrap yard, or a yard for the storage or distribution of minerals or the breaking of motor vehicles' and advised that the Council ensure that all the factors set out in the SPPS have been taken into account.

Invest NI is generally opposed to the loss of land either currently or last used for industrial development. They cite concerns that in removing the existing criteria and including it as guidance this would lead to a weakening in policy protection.

Some public respondents also suggested that the amendments proposed to PED 7 are too restrictive in relation to retail and commercial leisure development and would be unsustainable for future development of certain sites.

Others urged caution on mentioning specific *sui generis* uses such as car sales as this could be interpreted as allowance for retail development, generally.

Post consultation consideration

Discuss further with DfI Planning and other key consultees before considering whether to bring forward POP recommendation or not.

DfI Planning outlined its concerns with compatibility of the proposed uses referred to in Key Issue 8 and that Council should ensure that all the factors set out in the SPPS have been taken into account.

Other respondents' highlighted concerns pertaining to *sui generis* uses that may conflict with adjacent tenants and the potential for contamination of zoned land which could be a disincentive for businesses when considering future investment locations.

Post consultation consideration

Discuss further with DfI Planning and other

Policy PED 9: General Criteria for Economic Development

Sets out general criteria which economic development proposals will be required to meet, in addition to the other policy provisions within PPS 4.

SPPS accords with Policy PED 9.

SPPS adds that there is a need for LDPs to consider sustainable development, including connectivity with the (public) transport system when zoning land for economic development (as well as for sites outside of this zoned area (para 6.92 and 6.97)). SPPS also advises that LDPs should provide guidance in terms of key design, layout and landscaping requirements for economic development.

Policy PED 9 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy PED 9 is brought forward in the LDP Plan Strategy.

key consultees before considering whether to bring forward POP recommendation or not.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation

PPS 6: Planning Archaeology and the Built Heritage	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 9)
<p>Policy BH 1: The preservation of Archaeological Remains of Regional Importance and their Setting</p> <p>States that development proposals that would adversely affect such sites of regional importance or the integrity of their settings will not be permitted unless there are exceptional circumstances. The policy does not define what is likely to constitute 'exceptional circumstances'.</p>	<p>Paragraph 6.9 of SPPS accords with Policy BH 1 in that it states that development which would adversely affect such sites or the integrity of their settings must only be permitted in exceptional circumstances. Again, there is no guidance on what is likely to constitute 'exceptional circumstances'.</p>	<p>Policy BH 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>Key Issue 26 which deals with the protection of regionally significant archaeological remains. The Preferred Option would allow for the designation of Specific Areas of Constraint (with regard to specific types of development) within existing or proposed Areas of Significant Archaeological Interest.</p> <p><i>It is recommended that the wording of Policy BH 1 is brought forward in the LDP Plan Strategy with potential amendments to recognise any spatial designation of Areas of Constraint that may be introduced through the LDP.</i></p> <p>Consideration will also be given to providing some guidance on 'exceptional circumstances' for example whether 'exceptional circumstances' should relate only to 'regionally significant proposals'.</p>	<p>Strong support from statutory consultees and public respondents. HED stated that as these sites are designated as being of regional importance (NI wide) exceptional circumstances for development should only apply when the proposed development has similar importance, i.e. for NI as a whole. They welcomed the potential identification of Areas of Constraint around the Knockdhu ASAI in order to protect the wider setting of the historic landscape there, and seek clarification as to how this designation would be brought forward and what criteria would be used.</p> <p>HMC recommended that further discussion is needed to provide protection through the designation of Specific Areas of Constraint. The forthcoming guidance on Setting and the Historic Environment by HED should be referenced in developing policy criteria in these areas.</p> <p>Comments received from statutory consultees and public respondents are set out under Key Issue 26.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Policy BH 2: The Protection of Archaeological Remains of Local Importance and their Setting</p> <p>States that development proposals which would adversely affect archaeological sites or monuments which are of local importance (or their settings) will only be permitted where the planning authority considers that the proposed development outweighs the value of the remains.</p>	<p>SPPS (para 6.9) accords with Policy BH 2 in that it states that development proposals which would adversely affect archaeological remains of local importance or their settings should only be permitted where the planning authority considers that the need for the proposed development or other material considerations outweigh the value of the remains and/or their settings.</p> <p>In addition, the SPPS recommends a Plan-led approach to the identification of Areas of Archaeological Potential (AAP) within settlement limits where, on the basis of current knowledge archaeological remains may be encountered. The intention is to provide more certainty for prospective developers.</p>	<p>Policy BH 2 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p><i>It is recommended that the wording of Policy BH 2 is brought forward in the LDP Plan Strategy with amendments to recognise any spatial designation of existing or new AAPs that may be introduced through the LDP.</i></p>	<p>HMC noted that the forthcoming guidance on Setting and the Historic Environment by HED should be referenced in developing policy criteria in these areas.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Policy BH 3: Archaeological Assessment and Evaluation</p> <p>Requires that in circumstances where it is uncertain what impact a development will have or where the relative importance of the remains is unknown, developers will normally be requested to provide an archaeological assessment or evaluation.</p>	<p>Paragraph 6.10 of SPPS accords with Policy BH 3 – retains the presumption of refusal if the requested information is not submitted.</p>	<p>Policy BH 3 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p><i>It is recommended that the wording of Policy BH 3 is brought forward in the LDP Plan Strategy.</i></p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>

Policy BH 4: Archaeological Mitigation

Stipulates that if permission is granted for a development that will affect sites known to have archaeological remains, then conditions will be attached to ensure that appropriate measures are taken for the identification and mitigation of the archaeological impacts of the development.

Policy BH 5: The Protection of World Heritage Sites

Policy BH 6: The Protection of Parks, Gardens and Demesnes of Special Historic Interest

This policy offers protection for historic Parks, Gardens and Demesnes and will not normally permit development which would lead to the loss of, or cause harm to, the character, principal components or setting of parks, gardens and demesnes of special historic interest. Where planning permission is granted this will normally be conditional on the recording of any features of interest which will be lost before development commences.

Policy BH 7: Change of Use of a Listed Building

Policy BH7 - The Department will normally permit the change of use of a listed building where this secures its upkeep and survival and the character and architectural or historic interest of the building would be preserved or enhanced.

Policy BH 8: Extension or Alteration of a Listed Building

Sets out the criteria to enable the assessment of development proposals for the extension or alteration of a listed building – it stipulates that the Planning Authority will normally only grant consent to proposals for the extension or alteration of a listed building where all the following criteria are met:

(a) the essential character of the building and its setting are retained and its features of special interest remain intact and unimpaired;

Paragraph 6.11 of SPPS generally accords with Policy BH 4 but does not refer specifically to the use of planning conditions but instead refers to 'appropriate measures' being taken.

SPPS refers to World Heritage Sites in paragraph 6.29.

SPPS generally accords with Policy BH 6 in that it states that planning permission should not be granted for development that would lead to the loss of, or cause harm to, the overall character, principal components or setting of Historic Parks, Gardens and Demesnes.

SPPS accords with Policies BH 7 and BH 8 in that development involving a change of use and/or works or extension/alteration may be permitted, particularly where this will secure the ongoing viability and upkeep of the building.

Such development should respect the essential character and architectural or historic interest of the building and its setting, and features of special interest should remain intact and unimpaired.

Proposals should be based on a clear understanding of the importance of the building/place/heritage asset, and support the best viable use that is compatible with the fabric, setting and character of the building.

Policy BH 4 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy BH 4 is brought forward in the LDP Plan Strategy.

As there are no designated World Heritage Sites within our Borough it is recommended that this policy is not brought forward through the LDP.

Policy BH 6 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

It is recommended that the wording of Policy BH 6 is brought forward in the LDP Plan Strategy with potential amendments to recognise any spatial designation of Specific Areas of Constraint that may be introduced through the LDP.

It is also recommended that the wording 'will not normally' within Policy BH 6 be removed and replaced 'should not' in order to be more in keeping with the language of the SPPS.

Policies BH 7 and BH 8 appear to be working well and there is no evidence to suggest that they need to be substantially amended.

It is recommended that the wording of Policy BH 7 and BH 8 is brought forward in the LDP Plan Strategy but make reference to the requirement for a Design and Access Statement as part of any proposal.

It is also recommended that the word 'normally' within Policy BH 8 be removed and replaced with 'should' in order to be more in keeping with the language used in the SPPS.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation.

HED and HMC acknowledged that whilst there are presently no World Heritage sites in the District, should any be designated in the future, appropriate policy in line with this would require to be developed. HMC noted that there is nothing to gain from dropping BH 5 and that it might be useful in the context of potential future policy designations. In this regard they referred to Gracehill, west of Ballymena, which is the only complete Moravian Church settlement in Ireland.

Post consultation consideration
Bring forward POP recommendation.

HED welcomes the recommendation to retain the policies from PPS 6 as separate entities and acknowledge their modification to reflect the legislative changes introduced through the Planning Act (NI) 2011 and the new strategic policy context of the SPPS.

Post consultation consideration
Bring forward POP recommendation.

HED welcomes the recommendation to retain the policies from PPS 6 as separate entities and acknowledge their modification to reflect the legislative changes introduced through the Planning Act (NI) 2011 and the new strategic policy context of the SPPS.

Post consultation consideration
Bring forward POP recommendation.

- (b) the works proposed make use of traditional and/or sympathetic building materials and techniques which match or are in keeping with those found on the building; and
- (c) the architectural details (e.g. doors, gutters, windows) match or are in keeping with the building.

Policy BH 9: The Control of Advertisement on a Listed Building

States that advertisement consent will normally only be granted for consent for advertisements or signs on a listed building where these are carefully designed and located to respect the architectural form and detailing of the building.

Paragraph 6.14 of SPPS generally accords with Policy BH 9 in that it states that advertisement consent should only be forthcoming where these are carefully designed and located to respect the architectural form and detailing of the building, and also meet the requirements of strategic policy on the Control of Outdoor Advertisements.

Policy BH 9 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

It is recommended that the word 'normally' be removed and replaced with 'should' in order to be more in keeping with the language used in the SPPS.

HED welcomes the recommendation to retain the policies from PPS 6 as separate entities and acknowledge their modification to reflect the legislative changes introduced through the Planning Act (NI) 2011 and the new strategic policy context of the SPPS.

Post consultation consideration

Bring forward POP recommendation. Give consideration to the simplification and integration of all policies relating to advertisements into a single Advertisement Policy.

Policy BH 10: Demolition of a Listed Building

Sets out a general presumption in favour of retaining listed buildings and seeks to prevent the demolition of a listed building unless there are exceptional reasons why the building cannot be retained in its original or in a reasonably modified form. Where, exceptionally, listed building consent is granted for demolition this will normally be conditional on prior agreement for the redevelopment of the site and appropriate arrangements for recording the building before its demolition.

SPPS accords with Policy BH 10 in that it stipulates that the total demolition or demolition of any significant part of a listed building must not be permitted unless there are exceptional reasons as to why it cannot be retained in its original or reasonably modified form. Where consent is given this will normally be conditional on prior agreement for the redevelopment of the site and appropriate arrangements put in place to enable the recording of the building prior to demolition.

Policy BH 10 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

It is recommended that the wording of Policy BH 10 is brought forward in the LDP Plan Strategy with an amendment that stipulates that any structural information/report submitted as part of any case for demolition be to a specified minimum standard as agreed by the Council.

HED welcomes the recommendation to retain the policies from PPS 6 as separate entities and acknowledge their modification to reflect the legislative changes introduced through the Planning Act (NI) 2011 and the new strategic policy context of the SPPS.

Post consultation consideration

Bring forward POP recommendation.

Policy BH 11: Development affecting the Setting of a Listed Building

Sets out the policy criteria to enable the consideration of applications which may affect the setting of a listed building. It will not normally permit development which would adversely affect the setting of a listed building. Development proposals will normally only be considered appropriate where all the following criteria are met:

- (a) the detailed design respects the listed building in terms of scale, height, massing and alignment;
- (b) the works proposed make use of traditional or sympathetic
- (c) building materials and techniques which respect those found on the building; and
- (d) the nature of the use proposed respects the character of the setting of the building.

SPPS does not have specific policy wording directly relating to the impact of proposed development on the setting of a listed building – it makes passing reference in paragraph 6.12 and 6.13 but would be considered to accord with Policy BH 11.

Policy BH 11 is working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy BH 11 is brought forward in the LDP Plan Strategy.

HED welcomes the recommendation to retain the policies from PPS 6 as separate entities and acknowledge their modification to reflect the legislative changes introduced through the Planning Act (NI) 2011 and the new strategic policy context of the SPPS.

HED commented that the term 'setting' applies to anything in the physical space that is part of, has an impact on, or contributes to the significance and distinctive character of a historic asset, or through association with the site, or how the asset may be seen, understood or experienced.

Post consultation consideration

Discuss the definition of 'setting' with HED before bringing forward POP recommendation.

Policy BH 12: New development in a Conservation Area

Stipulates that permission will normally only be granted approval for new buildings, alterations, extensions and changes of use in, or which impact on the setting of, a conservation area where all the criteria (a) to (g) are met.

Criterion (a) requires that the development preserves or enhances the character and appearance of the area.

SPPS amends criterion (a) of Policy BH 12 to take account of legislative change introduced by Section 104 of the Planning Act 2011.

Accordingly, in managing new development within a designated Conservation Area the amended guiding principle is to afford special regard to the desirability of 'enhancing the character or appearance where an opportunity to do so exists', or to 'preserve its character or appearance where an opportunity to enhance does not arise'.

There will be a presumption against the granting of planning permission for development where proposals would conflict with this principle.

Policy BH 13: The control of advertisements in a Conservation Area

Requires that any consent for the display of advertisements in or close to a conservation area does not adversely affect the character, appearance or setting of the area or be detrimental to public safety.

SPPS generally accords with Policy BH 13 in that the consent for the display of an advertisement in or close to a Conservation Area should only be granted where it would not adversely affect the overall character, appearance or setting of the area.

SPPS also states that it may be appropriate to bring forward policies within LDP for the control of outdoor advertisements, tailored to local circumstances but any policy must be compatible with other policies set out within the SPPS.

The Conservation Area policy within the SPPS places a greater emphasis on new development that will 'enhance' the character of the area.

Only where an opportunity to enhance does not exist should the lesser test of 'preserving' be considered. There is now a requirement to amend this policy to reflect the change in the policy slant.

It is recommended that Policy BH 12 is brought forward in the LDP Plan Strategy and amended to reflect the SPPS as indicated.

Policy BH 13 appears to be working well, but it has become apparent that there are some issues relating to the display of certain types of advertisements within conservation areas which benefit from 'deemed consent'.

It is recommended that the wording of Policy BH 13 is brought forward in the LDP Plan Strategy but consideration given to the introduction of specific policy wording relating to the control of flashing, scrolling, animated, intermittent or moving digital signage.

Any separate strategic policy on Advertisement in the form of an Advertisement Strategy should take account of the special architectural or historic interest of conservation areas.

HED welcomes the recommendation to retain the policies from PPS 6 as separate entities and acknowledge their modification to reflect the legislative changes introduced through the Planning Act (NI) 2011 and the new strategic policy context of the SPPS.

Post consultation consideration

Bring forward POP recommendation.

HED welcomes the recommendation to retain the policies from PPS 6 as separate entities and acknowledge their modification to reflect the legislative changes introduced through the Planning Act (NI) 2011 and the new strategic policy context of the SPPS.

The majority of statutory consultees and public respondents were supportive of the introduction of specific policy wording relating to the control of flashing, scrolling, animated, intermittent or moving digital signage. One respondent noted that care should be taken relating to interactive displays which enable the appropriate enjoyment of the area. Translink advised caution in the wording of this policy to ensure that passenger information signage at bus stops are not precluded. Both HED and HMC were supportive of the suggested policy amendment. It was also suggested that consideration be given to the introduction of 'protection of amenity' within BH 13 to ensure adequate protection from potential light nuisance.

Post consultation consideration

Bring forward POP recommendation. We will consider all comments in bringing forward any policy amendments. We will give consideration to the simplification and integration of all policies relating to advertisements into a single Advertisement Policy.

Policy BH 14: Demolition in a Conservation Area

Policy BH14 will normally only permit the demolition of an unlisted building in a conservation area where the building makes no material contribution to the character and appearance of the area. Where conservation area consent for demolition is granted this will normally be conditional on prior agreement for the redevelopment of the site and appropriate arrangements for recording the building before its demolition.

Policy BH 15: The Re-use of Non-Listed Vernacular Buildings

Policy BH 15 sets out the criteria in relation to the re-use of non-listed vernacular buildings – planning permission will normally only be granted for the sympathetic conversion of non-listed vernacular buildings to other appropriate uses where this would secure their upkeep and retention. In the countryside conversion to residential use will normally only be considered appropriate where the building to be converted is an important element in the landscape and of local architectural merit or historic interest

SPPS amends criterion (a) of Policy BH 14 to take account of legislative change introduced by Section 104 of the Planning Act 2011. Accordingly, in managing demolition within a designated Conservation Area the amended guiding principle is to afford special regard to the desirability of 'enhancing the character or appearance where an opportunity to do so exists', or to 'preserve its character or appearance where an opportunity to enhance does not arise'.

There will be a presumption against the granting of planning permission for demolition where proposals would conflict with this principle.

SPPS generally accords with Policy BH 15, but widens the scope of the policy to refer to 'non-designated heritage assets'. Such assets include not only vernacular buildings, but also historic buildings of local importance.

The SPPS also goes beyond the 're-use' of the assets, by requiring the planning authority, to consider the impact of any application on the significance of a non-designated heritage asset.

The SPPS does not provide any specific criteria but does suggest that it may be prudent to bring forward bespoke policies in the LDP for such buildings.

The Conservation Area policy within the SPPS places a greater emphasis on 'enhancing' the character of the area. There will be a general presumption against the grant of conservation area consent for demolition of unlisted buildings, where proposals would conflict with this principle. Only where an opportunity to enhance does not exist should the lesser test of 'preserving' be considered. There is now a requirement to amend this policy to reflect the change in the policy slant.

It is recommended that Policy BH 14 is brought forward in the LDP Plan Strategy and amended to reflect the SPPS as indicated.

Whilst Policy BH 15 seems to be working well, it is recommended that the policy is revised and updated to take account of the following factors:

- the language and wider scope of the SPPS;
- the need to incorporate sections of policy outlined in PPS 21 relating to Replacement Dwellings in the Countryside (Policy CTY 3) and the Conversion and Re-use of Existing Buildings in the Countryside (Policy CTY 4) insofar as they relate to non-listed vernacular dwellings and buildings;
- potential relaxation of the criteria (d) of Policy BH 15 which sets out a presumption against extending such buildings. It is thought that this criterion could hinder the delivery of the intent of the policy which is to secure the long term re-use of non-listed vernacular buildings.

HED welcomes the recommendation to retain the policies from PPS 6 as separate entities and acknowledge their modification to reflect the legislative changes introduced through the Planning Act (NI) 2011 and the new strategic policy context of the SPPS.

Post consultation consideration

Bring forward POP recommendation.

HED welcomes the recommendation to retain the policies from PPS 6 as separate entities and acknowledge their modification to reflect the legislative changes introduced through the Planning Act (NI) 2011 and the new strategic policy context of the SPPS.

HED acknowledged non-listed vernacular properties may lend themselves for use for a variety of class types (dwellings and others). In addition, they state that the conservation and reuse of vacant historic buildings should be heritage led to safeguard the property and its setting from inappropriate interventions. HED advocates councils identifying historic buildings of local importance in their area and referred to recently published guidance on the topic "Historic Buildings of Local Importance, A Guide to their Identification and Protection – May 2017".

In regard to extensions, HED suggested that any amended policy should require such a proposal to be subservient to the parent building and respect the essential character and architectural and historic interest of the parent building and its setting.'

Post consultation consideration

Review policy with HED and DfI in the context of its workability (refer to Key Issue 28 in this report)

PPS 6 Addendum: Areas of Townscape Character	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 9)
<p>Policy ATC 1: Demolition Control in an Area of Townscape Character</p> <p>States that there is a presumption in favour of retention where it is determined that the building makes a positive contribution to the character of the ATC. Demolition will normally only be allowed if it is considered that the building makes no material contribution. Where permission for demolition is granted this will normally be conditional on prior agreement for the redevelopment of the site.</p>	<p>SPPS accords with ATC 1 in that the demolition of an unlisted building in an ATC should only be permitted where the building makes no material contribution to the distinctive character of the area and subject to appropriate arrangements for the redevelopment of the site.</p>	<p>Policy ATC 1 is working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p><i>It is recommended that the wording of Policy ATC 1 is brought forward in the LDP Plan Strategy and amended to reflect the language of the SPPS (e.g. in regard to the replacement of the term 'normally').</i></p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>
<p>Policy ATC 2: New Development in an Area of Townscape Character</p> <p>States that development will only be permitted where it is considered to either maintain or enhance the overall character of the area. Existing trees, archaeological or other landscape features which contribute to the distinctive character of the area are to be protected and integrated in a suitable manner into the design and layout of the development.</p>	<p>SPPS carries through the general thrust of Policy ATC 2 in paragraph 6.21 which states that in managing development within ATCs designated through the LDP process, new development should only be permitted where this will maintain or enhance the overall character of the area and respect its built form.</p>	<p>Policy ATC 2 is working well and there is no evidence to suggest that it needs to be amended.</p> <p><i>It is recommended that the wording of Policy ATC 2 is brought forward in the LDP Plan Strategy.</i></p>	<p>One respondent suggested that the policy approach relating to, ATC/AVC together with requirements for good design and place making are sufficiently robust to protect built heritage features of importance.</p> <p>HED stated that in managing development within existing ATC's or any new proposed ATC's, designated through the LDP process the historic environment baseline evidence should be used to inform potential mitigation measures such as designations or key site requirements</p> <p>Post consultation consideration Bring forward POP recommendation.</p>
<p>Policy ATC 3: The Control of Advertisements in an Area of Townscape Character</p> <p>States that consent will only be granted for the display of an advertisement in an Area of Townscape Character where:</p> <ul style="list-style-type: none"> (a) it maintains the overall character and appearance of the area; and (b) it does not prejudice public safety. 	<p>SPPS paragraph 6.23 accords with Policy ATC 3.</p>	<p>Policy ATC 3 is working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p><i>It is recommended that the thrust of Policy ATC 3 is brought forward in the LDP Plan Strategy but consideration should be given to the introduction of specific policy wording relating to the control of flashing, scrolling, animated, intermittent or moving digital signage within ATCs.</i></p> <p>Any separate strategic policy on Advertisement in the form of an Advertisement Strategy should take account of the special architectural or historic interest of ATCs.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation. We will consider comments made in regard to the control of advertisement in Conservation Areas in bringing forward any amendment to this policy. We will also give consideration to the simplification and integration of all policies relating to advertisements into a single Advertisement Policy.</p>

PPS 7: Quality Residential Environments	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 7)
<p>Policy QD 1: Quality in New Residential Development Outlines specific policy criteria for the assessment of new residential developments in relation to site context, site characteristics, layout considerations, local neighbourhood facilities, form, materials and detailing, density, landscape design, public open space, private open space, movement, parking, privacy and security from crime.</p>	<p>SPPS sets out broad strategic policy with emphasis on the contribution that new housing development should strive for in meeting broader government objectives. These include the securing of sustainable forms of development and balanced communities. It also sets out the broad methodology for allocating housing land through the LDP and refers to meeting specific housing needs (e.g. through supported housing and traveller accommodation). In all of this the SPPS is more closely aligned with PPS 12: Housing in Settlements, than with the more design related focus of PPS 7.</p> <p>SPPS states that Councils should bring forward local planning policy or guidance for achieving quality in residential developments including residential extensions and alterations.</p>	<p>Policy QD 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>NIHE did however recommend that new policy requiring nearly zero energy housing, passive solar design and promoting the use of renewable energy could contribute to quality development and benefit the environment. NIHE also recommended that all dwelling units should be designed to Lifetime home standards (see review of Policy HS 4 in PPS 12 below).</p> <p>Consideration of NIHE proposals: Policy in regard to Zero Energy Homes was investigated, taking account of current building control standards, and at present is considered too high a standard to bring forward as policy in the LDP (See review of PPS 18 Policy RE 2 regarding energy efficient design).</p> <p>It is recommended that the wording of Policy QD 1 is amended to introduce an additional criteria promoting energy efficient design and SuDS where appropriate (see Key Issue 24), and brought forward in the LDP Plan Strategy. Alternatively, such criteria may be included in a general policy to apply to all new buildings.</p> <p>In addition, the amplification could provide direction to Creating Places and Living Places.</p>	<p>NIHE stated that they supported the amendments to QD 1 to introduce additional criteria to promote energy efficient design and the use of SuDS. They repeated their aspirations for all new housing to be beyond current building control standards to achieve SAP rating A and promote the use of renewable energy within developments.</p> <p>Post consultation consideration Further to previous consideration in regard to zero energy homes we will work closely with the relevant agencies including NIHE and Council's Building Control Department to investigate further how the LDP can promote energy efficient housing.</p> <p>We may bring forward amended policy if deemed appropriate.</p>
<p>Policy QD 2: Design Concept Statements, Concept Master Plans and Comprehensive Planning Sets out the criteria for the submission of design concept statements, concept master plans and comprehensive planning as tools in achieving high quality housing schemes that are design-led and responsive to site characteristics and opportunities.</p>	<p>The Planning (General Development Procedure) Order (Northern Ireland) 2015 makes the submission of a Design and Access Statement mandatory for all major applications or for proposals of 1 dwelling or more in a designated area, such as a Conservation Area.</p> <p>SPPS does not provide the same level of detail as Policy QD2 and it does not differentiate between design concept statements for all housing development and concept master plans for larger developments.</p> <p>SPPS devalues the need for the submission of a concept statement by using the term 'should be sought' rather than 'will require' as in QD 2.</p> <p>It does however seek the design concept to incorporate sustainable elements such as good linkage to schools, community facilities etc., as well as promoting the use of SuDS and energy efficient design.</p>	<p>Policy QD 2 appears to be working well, however the threshold for triggering the requirement for a concept master plan (300 or more dwellings/15 hectares or more site area) is considered to be too high for Mid and East Antrim, where most housing proposals are significantly smaller.</p> <p>It is recommended that the wording of Policy QD 2 is amended to reduce the threshold for a concept master plan to 200 dwellings or above or on sites of 10 hectares and above. It is also recommended that the amplification to Policy QD 2 should be expanded to include reference to the need for good linkages to existing infrastructure and community facilities.</p> <p>Whilst new legislation requires housing developments over 50 units/over 2 hectares to submit a Design and Access Statement, failure to retain the wording of QD 2 could result in, housing proposals of less than 50 units/under 2 hectares not being required to submit a concept statement nor a Design and Access Statement.</p>	<p>The majority of statutory consultees and public respondents agreed with the amended threshold for the submission of a concept master plan.</p> <p>HED suggested there is potential for policy consideration of a heritage led approach on appropriate sites and settings.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>

Addendum to PPS 7: Residential Extensions and Alterations	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 7)
<p>Policy EXT 1: Residential Extension and Alterations</p> <p>Sets out criteria to ensure proposals are of an acceptable design, scale, massing and materials and which take account of the existing property, character of the area, landscape features, amenity space and the residential amenity of neighbours.</p> <p>Also sets out detailed guidance in Annex A relating to the appropriate application of the policy criteria.</p>	<p>SPPS provides a strategic approach to achieving quality residential extensions and alterations. It does not provide the detail of Policy EXT 1 in terms of the individual criteria or the additional guidance provided in its associated Annex.</p> <p>SPPS states that Councils should bring forward local planning policy or guidance for achieving quality in residential developments including residential extensions and alterations.</p>	<p>Policy EXT 1 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p><i>It is recommended that the wording of Policy EXT 1 is brought forward in the LDP Plan Strategy.</i></p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
Addendum to PPS 7: Safeguarding the Character of Established Residential Areas	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 7)
<p>Policy LC 1: Protecting: Local Character, Environmental Quality and Residential Amenity (in addition to Policy QD1)</p> <p>Seeks to protect local character, environmental quality and residential amenity in established residential areas in addition to the criteria contained within Policy QD1.</p> <p>Sets out criteria in relation to density, pattern of development as well as specifying space standards for new dwellings and apartments.</p>	<p>SPPS generally accords with Policy LC1, however it does not provide space standards.</p>	<p>Policy LC 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p><i>It is recommended that the wording of Policy LC 1 and related Annex A is brought forward in the LDP Plan Strategy.</i></p> <p>As some criteria in Policy LC 1 overlap with Policy QD 1 there may be opportunity to consolidate policy wording from the two existing policies in the LDP.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Policy LC 2: The Conversion or Change of Use of Existing Buildings to Flats or Apartments (in addition to QD 1)</p> <p>Sets out 5 criteria that must be met one of which states that a building to be converted or adapted must have a floor area greater than 150 sq. metres.</p> <p>Other criteria seek to ensure each unit is self-contained, not solely to the rear of the proposal and access to the public street is maintained.</p>	<p>SPPS encourages sustainable development by accommodating housing through recycling buildings and encouraging compact urban forms.</p> <p>The detail in Policy LC 2 aligns with SPPS strategic policy to increase housing density without town cramming and other policies to achieve quality residential environments. SPPS is not prescriptive.</p>	<p>Policy LC 2 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p><i>It is recommended that the wording of Policy LC 2 is amended to include an additional criteria requiring adequate waste storage areas that are well designed as an integral part of the proposed development, and brought forward in the LDP Plan Strategy.</i></p> <p>Alternatively, such a criterion could be included within a general policy in the LDP Plan Strategy so it would apply to new apartments.</p> <p>As some criteria in Policy LC 2 overlaps with Policy QD 1 there may be opportunity to consolidate policy wording from the two existing policies in the LDP Plan Strategy.</p>	<p>Strong support from statutory consultees and public respondents for an additional criterion requiring the provision of waste storage areas that are designed as an integral part of the proposed development when assessing of conversions or change of use proposals to apartments. All statutory consultees and public respondents agreed that this should also apply to all new apartments. NIHE considered adequate waste storage areas as important for safeguarding amenity.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Policy LC 3: Permeable Paving in New Residential Development</p> <p>Promotes the use of permeable paving within new residential developments to reduce the risk of flooding.</p>	<p>SPPS states that a design concept should be submitted with proposals and it should incorporate sustainable elements such as the use of SuDS where appropriate therefore following the thrust of Policy LC 3.</p>	<p><i>It is recommended that the wording of Policy LC 3 is brought forward in the LDP Plan Strategy.</i></p>	<p>NIHE supported the use of SuDS.</p> <p>Post consultation consideration <i>It is recommended that the thrust of Policy LC 3 is brought forward or alternatively incorporated into a wider strategic policy on SuDS.</i></p>

Annex A: Space Standards

Internal floor space standards for apartments and dwellings.

Detail not provided in the SPPS.

It is recommended that the wording of Annex A is brought forward in the LDP.

The majority of statutory consultees and public respondents thought that the space standards set out in Annex A should be retained and that they should be applied to all new apartments and dwellings. NIHE noted that these standards are already mandatory for all new build social housing and are important for creating well-functioning living environments.

Post consultation consideration
Bring forward POP recommendation.

Annex E: Definition of an Established Residential Area

Detail not provided in the SPPS.

It is recommended that the wording of Annex E is brought forward in the LDP.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation.

PPS 8: Open Space, Sport and Outdoor Recreation	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 7)
<p>Policy OS 1: Protection of Open Space Presumption against the loss of open space irrespective of its physical condition/appearance.</p> <p>Two exceptions are listed: (i) where it is demonstrated that there is substantial community benefit and (ii) or when the loss of open space will have no significant detrimental impact on amenity, character or biodiversity of an area.</p> <p>The second exception only applies where either of the following circumstances occur: - (i) where the area of open space to be lost is 2 hectares or less and appropriate alternative provision is made and (ii) where playing fields within settlement limits are to be lost, it must be demonstrated that the retention and enhancement of the facility can only be achieved by developing a small part of the existing space (limited to a maximum of 10%).</p>	<p>SPPS accords with PPS 8 although it simply states 'loss of open space' whereas PPS 8 states 'existing open space or land zoned for provision of open space'.</p> <p>SPPS refers to the general exceptions listed in Policy OS 1.</p> <p>However, in regard to the second exception it does not include the same detail as Policy OS 1. SPPS simply states that the loss of open space will be acceptable where it is demonstrated that there will be no detrimental impact and does not detail the two caveats listed in Policy OS 1.</p>	<p>Policy OS 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>NIHE have stated that they would like to see a policy similar to that set out in PPS 8 (Policy OS 1 and Annex C) which allows an exception to the retention of open space, where development will provide community benefit, retained in the LDP.</p> <p><i>It is recommended that the thrust and exceptions of Policy OS 1 are brought forward in the LDP Plan Strategy and that the current NIHE Protocol (or amended as necessary following discussion with NIHE) is included in the justification text or as an accompanying guidance document.</i></p>	<p>Majority consensus from statutory consultees and public respondents that the NIHE protocol should be retained. NIHE would welcome acknowledgement that social housing is a 'substantial community benefit,' in these exceptional cases. DfI reminded Council of the presumption against the loss of open space and that a new protocol will have to be negotiated between the Council and NIHE as the current protocol was agreed between DOE and NIHE.</p> <p>One public respondent considered that even where loss of open space is accepted for development providing for community benefit, it should be compensated elsewhere.</p> <p>Post consultation consideration <i>Bring forward POP recommendation and negotiate new protocol with NIHE similar to current one with DOE.</i></p>
<p>Policy OS 2: Public Open Space in New Residential Development</p> <p>Requires that a development of 300 units or more or 15 hectares or more should provide a normal expectation of around 15% of the total site area as open space. Developments of 25 units or more should provide a normal expectation of at least 10% of the total site area as open space with smaller schemes being considered on their individual merits. The policy includes examples of circumstances when a relaxation of the standard may warrant consideration e.g. when the site is close to and would benefit from existing public open space.</p> <p>Provides criteria against which to assess open space provision.</p> <p>A children's play area is required for developments of 100 units or more or sites of 5 hectares or more.</p> <p>Future management of open space provided has to be provided and 3 examples of suitable arrangements are provided in the policy.</p>	<p>SPPS requires new residential developments of appropriate scale (generally 25 units or more, or on sites of one hectare and above) to provide adequate and well-designed open space as an integral part of the development. Suitable mechanisms to secure future management and maintenance of open space should be put in place.</p> <p>SPPS does not specify minimum areas in the same way that Policy OS 2 does. Emphasis is on well-designed open space however it does not offer any clarification on this term or how it could be demonstrated. No specific criteria are identified and it also does not offer any direction with regards to what are suitable mechanisms for management.</p> <p>SPPS is not prescriptive in terms of children's play provision in residential developments but rather it is mentioned within the wider context of assessing the overall provision of public and private open space. The SPPS calls for Councils to carry out a survey to inform the LDP in order to establish existing provision and identify future need and to bring forward appropriate local policies and proposals for the plan area.</p>	<p>The issue of open space in new residential developments is considered in Chapter 7:</p> <p>Key Issue 19 deals with provision of open space in new residential developments. The Preferred Option is to retain current strategic criteria based policy regarding public open space contained in Policy OS2 of PPS 8 i.e. setting out a 10% requirement of open space in residential developments of 25 units or more and a 15% requirement for development over 300 units and a slightly amended list of locations where a rate less than 10% may be acceptable unless otherwise specified through key site requirements.</p> <p>Key Issue 18 deals with playpark provision. The Preferred Option is to retain current policy i.e. residential developments of 100 units or more, or on sites of 5 hectares or more will be required to provide an equipped children's play area unless otherwise specified through key site requirements.</p> <p>In regard to the management and maintenance of open space it is recommended that the existing policy wording in OS 2 is retained but with additional criteria that proposed open space must meet in order to be considered for adoption by Council i.e. a minimum size of useable play/recreation space of 1000sqm or more (e.g. 50m x 20m) and structured play spaces with an area of no less than 600sqm.</p>	<p>Strong support from statutory consultees and public respondents who considered the thresholds for open space provision in Policy OS 2 are appropriate.</p> <p>The majority of statutory consultees and public respondents agreed that in relation to the management and maintenance of open space, the wording of Policy OS 2 should be amended to include additional criteria that proposed open space must meet in order to be considered suitable for adoption by Council.</p> <p>Also see comments for Key Issues 18 and 19.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>

Policy OS 3: Outdoor Recreation in the Countryside

Sets out 8 detailed criteria such development in the countryside must meet in order to be considered acceptable. The amplification provides further guidance on individual types of recreation e.g. Golf courses, driving ranges, equestrian uses etc. Recognises the importance of outdoor recreation in countryside provided it is sustainable and does not conflict with need to preserve and enhance the environment.

Policy OS 4: Intensive Sports Facilities

Outlines sports facilities such as stadia, leisure centres and sports halls are generally only permitted in settlements. An exception may be permitted where 4 criteria can be met – no alternative site in the settlement, must be close to edge of settlement/visually associated with it, no adverse impact on settlement and in scale with settlement.

In all cases, 5 criteria must also be met including no impact on amenity, heritage, high standard of design, access, adequate car parking and infrastructure.

A definition of intensive sports facilities is provided in the amplification along with additional user guidance.

SPPS generally accords Policy OS 3. It states that LDPs should contain policy for outdoor recreation in the countryside which should have regard to a range of issues e.g. visual and residential amenity, public and road safety, accessibility and impact on nature conservation, landscape character, archaeology or built heritage.

Relevant planning consideration broadly align with Policy OS 3, with some differences for example the SPPS refers to hours of operation but does not mention loss of good quality agricultural land.

SPPS generally accords with Policy OS 4, advising that such facilities must be in settlements. It does allow for exceptions just outside of a settlement but only where clear criteria can be established to justify a departure.

Overall the policy objectives of the SPPS and PPS 8 are the same. The SPPS requires clear criteria to be set and Policy OS 4 provides this.

SPPS also clarifies that an intensive sports facility is defined as a purpose built indoor or outdoor resource which facilitates one or more activity fundamental to maintaining health and fitness.

This approach would require developers to engage with Council early in the design process to ensure provision of open space/play parks that are suitable for the site and which meets the specific needs of the local area.

It is recommended that minor amendments above are made to the wording of Policy OS 2 in line with Key Issues 18 and 19 and brought forward in the LDP Plan Strategy.

Policy OS 3 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

It is recommended that the wording of Policy OS 3 is brought forward in the LDP Plan Strategy with an additional criteria referring to hours of operation to take account of the SPPS. In addition it is recommended that the amplification text on equestrian uses should be expanded to clarify that this policy only applies to commercial equestrian uses.

Policy OS 4 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy OS 4 is brought forward in the LDP Plan Strategy.

CCGBC and the majority of public respondents agreed that additional criteria should be added to allow for consideration of hours of operation in relation to Policy OS 3. NIEA raised concerns regarding possible night time lighting which could potentially impact upon foraging and roosting bats. NIEA request that the protected species policy is signposted within the plan to ensure due consideration throughout the planning process.

The majority of public respondents disagree that this policy should only be applied to commercial equestrian uses in the countryside. However, no one gave any explanation.

Post consultation consideration

The impact of floodlighting on bats will be highlighted in the amplification text of an amended PPS 2 NH 2 policy.

Given the unexplained rationale for disagreement with the POP recommendation as it relates to equestrian uses in the countryside, the policy wording will be further discussed with DfI and other relevant bodies before the Plan Strategy is finalised.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration

Bring forward POP recommendation.

Policy OS 5: Noise Generating Sports and Outdoor Recreational Activities

Such developments are only permitted where 3 criteria are met: no impact on amenity, no disturbance to livestock, no conflict with sensitive locations.

Policy OS 6: Development of Facilities ancillary to Water Sports

Such developments are permitted provided that 7 criteria can be met e.g. compatibility with existing use of the water, no adverse impact on nature conservation, no adverse impact on character of local landscape, no pollution noise or disturbance, appropriate design and scale.

Policy OS 7: The Floodlighting of Sports and Outdoor Recreational Facilities

Such development is only permitted when 3 set criteria can be met. There must be no unacceptable impact on nearby residential amenity, no adverse impact on visual amenity or character of the locality and no prejudice to public safety.

Annex A: Definition of Open Space

Definition of Open Space provided along with a typology illustrating a range of examples of open space that are of public value.

Annex B: Summary of the National Playing Fields Association Minimum Standard for Outdoor Recreation

Sets out detail on the '6 acre standard' and the definition of outdoor playing space

SPPS generally accords with Policy OS 5.

SPPS states that particular attention should be paid to development proposals that generate high levels of noise. It states they will only be permitted where there will be no unacceptable level of noise to nearby noise sensitive uses, farm animals or wildlife, or where it impacts on local character.

Additional strategic guidance on noise as a material consideration is set out in Annex A of the SPPS.

SPPS generally accords with Policy OS 6.

It lists a range of relevant planning considerations that all proposals for sport and recreation activities, including facilities ancillary to watersports should adhere to. These are similar to those listed in Policy OS 6 save for the addition of reference to hours of operation, access and links to public transport, floodlighting, public safety (including road safety) and biodiversity.

SPPS generally accords with Policy OS 7.

Floodlighting is listed as one of the relevant planning considerations for all proposals for sport and recreation activities.

SPPS does not provide detailed policy wording beyond this.

The Glossary of the SPPS includes a definition of Open Space as per Annex A but it does not include the same level of detail.

SPPS states that the provision of open space in LDP should be assessed against the National Playing Fields Standard. SPPS does not include the same level of detail.

It is recommended that the wording of Policy OS 5 is amended so as to better reflect the SPPS.

Policy OS 6 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

It is recommended that the wording of Policy OS 6 is brought forward in the LDP, and amended to include some of the relevant additional criteria in SPPS.

Feedback from consultees indicates that Policy OS 7 is generally sound. NIEA Natural Environment Division recommend an additional criterion in regard to safeguarding bats. Having taken account of this comment, it was considered that other policies in the LDP will address this issue.

It is recommended that the wording of Policy OS 7 is brought forward in the LDP and the amplification text extended to direct applicants to guidance such as The Institute of Lighting Profession thresholds or equivalent.

It is recommended that the detail in Annex A should be brought forward in the LDP.

It is recommended that Annex B is not brought forward in the Plan Strategy as it does not refer to operational policy.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation.

Strong support from statutory consultees and public respondents for the inclusion of additional criteria within Policy OS 6 as per SPPS.

Post consultation consideration
Bring forward POP recommendation.

NIEA acknowledged that council do not wish to add additional criteria for bats in relation to floodlighting. However, request that the policy signposts the protected species policy within the plan to ensure the impact of floodlighting on bats is considered as it may not be common knowledge.

Post consultation consideration
The impact of floodlighting on bats will be highlighted in the amplification text of an amended PPS 2 NH 2 policy.

Bring forward POP recommendation.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
As per POP recommendation do not bring forward wording of Annex B.

Annex C: Key bodies which make valuable contribution to the development of Open Space, Sport and Outdoor Recreation.

Lists the role of key bodies such as Councils, Sports Council, and National Trust etc. NIHE are also listed and the Annex refers to large areas of Open Space in some of their estates which if there is substantial community benefit it may be appropriate to redevelop.

SPPS does not contain corresponding text.

NIHE have stated that they would like to see a policy similar to that set out in PPS 8 (Policy OS 1 and Annex C) which allows an exception to the retention of open space, where development will provide community benefit, retained in the LDP.

It is recommended that only the wording in Annex C regarding NIHE is brought forward in LDP guidance, and amended as necessary following further discussions with NIHE.

Majority consensus from statutory consultees and public respondents that the current NIHE protocol should be retained. NIHE would welcome acknowledgement that social housing is a 'substantial community benefit,' in these exceptional cases. DfI remind the Council of the presumption against the loss of open space and that a new protocol will have to be negotiated between the Council and NIHE as the current protocol was agreed between DOE and NIHE.

One public respondent considered that even where loss of open space is accepted for development for community benefit, it should be compensated elsewhere.

Post consultation consideration
Bring forward POP recommendation and negotiate new protocol with NIHE similar to current one with DOE.

PPS 10: Telecommunications	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 8)
<p>Policy TEL 1: Control of Telecommunications Development</p> <p>Sets out criteria for the control of telecommunications development along with necessary enabling works, where it will not result in unacceptable damage to visual amenity or harm environmentally sensitive features or locations.</p>	<p>SPPS is less detailed than Policy TEL 1 in the criteria to be adhered to, however, the SPPS accords with Policy TEL 1.</p>	<p>Policy TEL 1 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p>It is recommended that the wording of Policy TEL 1 is brought forward in the LDP Plan Strategy. This policy may be re-examined after consideration of responses to Key Issue 33 and whether to restrict or prevent certain types of development within these areas of sensitive landscapes if identified.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>
<p>Policy TEL 2: Development and Interference with Television Broadcasting Services</p> <p>Sets out criteria for the development and interference with television and broadcasting services, planning permission would be refused for development proposals which would result in undue interference within terrestrial television broadcasting services. This policy was cancelled by the SPPS.</p>	<p>Policy TEL 2 cancelled by SPPS.</p>	<p>It is considered that there is no need to carry forward Policy TEL 2.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>

PPS 11: Planning and Waste	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 8)
<p>Policy WM 1: Environmental Impact of a Waste management facility</p> <p>Sets out criteria for proposal for the development of waste management facilities subject to a thorough examination of environmental effects. A proposal will only be permitted where it can be demonstrated that all of the criteria are met.</p>	<p>SPPS is less detailed than Policy WM 1 in the criteria to be adhered to, however, it accords with Policy WM 1.</p>	<p>Policy WM 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended other than to update wording to reflect the value waste as a resource.</p> <p><i>It is recommended that an amended Policy WM 1 is brought forward in the LDP Plan Strategy.</i></p>	<p>Broad support for Council's approach to reviewing PPS 11.</p> <p>A number of public responses relating to waste management supported amending policy to reflect the value of waste as a resource.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Policy WM 2: Waste Collection and Treatment facilities</p> <p>Sets out criteria for the development of waste collection or treatment facilities.</p> <p>It also sets out locational criteria where the proposed development would have to comply with one or more of the criteria. It also sets out other additional criteria to be met including transport, suitable buildings, and environmental impact.</p>	<p>SPPS is less detailed than Policy WM 2 in the criteria to be adhered to, however, it accords with Policy WM 2.</p> <p>SPPS adds detail regarding updated recycling targets; 'EU Waste Framework Directive (WFD) target of recycling including preparing for re-use) 50% of households waste by 2020, as well as the Executives Programme for Government commitments.</p> <p>SPPS adds in the case of a regional scale waste collection or treatment facilities, that it must be located close to and benefit from easy access to key transport corridors, particularly rail and water (para 6.314).</p>	<p>Policy WM 2 appears to be working well and there is no evidence to suggest that it needs to be substantially amended other than to update wording to reflect the value of waste as a resource, and integrated better within new development.</p> <p>Policy WM 2 will also require updating to remove references to Best Practicable Environmental Option (BPEO) which was removed as a material consideration in November 2013.</p> <p><i>It is recommended that an amended Policy WM 2 is brought forward in the LDP Plan Strategy.</i></p>	<p>Although no options were presented within the POP for water, sewerage and waste management, DfI highlighted that the Council's desired growth necessitates enhancement of this infrastructure within the Borough.</p> <p>DfI also welcomed the close working relationship with NI Water to determine locations where new/upgraded WWTW's may be needed.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Policy WM 3: Waste Disposal</p> <p>Sets out criteria for the development of landfill or land raising facilities for the disposal of waste. This Policy also provides for the development of interim landfill or land raising facilities for the disposal of waste, subject to meeting several criteria.</p>	<p>SPPS is less detailed than Policy WM 3 in the criteria to be adhered to, however, it accords with Policy WM 3.</p>	<p>Policy WM 3 appears to be working well and there is no evidence to suggest that it needs to be substantially amended other than to update wording to reflect the value of waste as a resource, and integrated better within new development.</p> <p>Policy WM 3 will also require updating to remove references to Best Practicable Environmental Option (BPEO) which was removed as a material consideration in November 2013.</p> <p><i>It is recommended that an amended Policy WM 3 is brought forward in the LDP Plan Strategy.</i></p>	<p>Some respondents suggested that the introduction of positive waste management policies in the LDP as part of a holistic approach could tackle unlawful disposal. Other respondent's suggestions included consideration of the waste hierarchy, treating waste as a lifecycle, adopting the proximity principle in assessing proposals; vacuum suction systems; and keeping facilities and disposal of inert waste in suitable industrial areas, including quarries.</p> <p>It was also considered by numerous respondents that Council should have its own long term strategy for dealing with waste sustainably.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Policy WM 4: Land Improvement</p> <p>Sets out criteria for the disposal of inert waste by its deposition on land where it is demonstrated that it will result in land improvement.</p>	<p>There is no provision for Land Improvement in the SPPS.</p>	<p>Policy WM 4 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p><i>It is recommended that the wording of Policy WM 4 is updated to remove references to Best Practicable Environmental Option (BPEO) which was removed as a material consideration in November 2013.</i></p>	<p>RSPB strongly advocated a sustainable approach to waste management and highlighted that any disposal of inert waste to secure land improvement should be steered away from sensitive sites, where there may be detrimental impacts on habitats or species.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>

Policy WM 5: Development in the Vicinity of Waste Management Facilities

Sets out criteria for proposals involving the development of land in the vicinity of existing or approved waste management facilities and waste water treatment works (WWTW).

SPPS (6.318) accords with Policy WM 5.

It is recommended that an amended Policy WM 4 is brought forward in the LDP Plan Strategy.

Policy WM 5 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy WM 5 is brought forward in the LDP Plan Strategy.

No comments received from statutory consultees or public respondents to this planning principle.

Post consultation consideration
Bring forward POP recommendation.

PPS 12: Housing in Settlements	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 7)
<p>PCP 1: Increased Housing Density without Town Cramming</p> <p>A principle rather than policy, but relates to HS 1: Living Over the Shop (set out below) and reiterates PPS 7. Promotes increased density in housing developments by encouraging compact urban forms and promoting more housing within existing urban areas.</p>	<p>The strategic policy of the SPPS generally accords with PCP 1 and promotes higher density housing developments within city and town centres and other locations that benefit from high accessibility to public transport facilities.</p> <p>There are subtle changes to the text in the SPPS such as the word 'privacy' has been substituted with 'amenity' and 'safeguarding' has replaced 'not significantly eroded'.</p>	<p>Principle PCP 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>However, as this planning principle is not operational policy and has been transposed in the SPPS it does not need to be brought forward in the LDP Plan Strategy.</p>	<p>No comments received from statutory consultees or public respondents to this planning principle.</p> <p>Post consultation consideration As per POP recommendation do not bring forward wording of PCP 1.</p>
<p>PCP 2: Good Design</p> <p>A principle rather than policy and reiterates PPS 7. Promotes that all new housing development should demonstrate a high quality of design, layout and landscaping.</p>	<p>'Good Design' is a regional strategic policy within the SPPS and is also one of the Core Planning Principles identified, alongside 'Place Making'.</p> <p>SPPS recognises the contribution that good design can have on achieving sustainable development by providing safe and attractive places to live, it also calls for roads infrastructure to be considered in relation to good design.</p> <p>SPPS generally accords with PCP 2 and states that Councils should bring forward local planning policy or guidance for achieving quality in residential development including proposals for residential extensions or alterations.</p>	<p>Principle PCP 2 appears to be working well, however this planning principle is not currently operational policy.</p> <p>It is recommended that a General operational policy will be included in the LDP Plan Strategy promoting good design and urban design criteria developed for key strategic locations taking account of the SPPS Core Planning Principles and other relevant guidance such as Living Places and Creating Places.</p>	<p>No comments received from statutory consultees or public respondents to this planning principle.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>
<p>PCP 3: Sustainable Forms of Development</p> <p>A principle rather than policy and reiterates PPS 7. Promotes the reuse of brownfield land and the recycling of buildings within settlements.</p>	<p>'Sustainable Development' is a Core Planning Principle of the SPPS.</p> <p>SPPS accords with PCP 3, and includes the additional line 'the encouragement of compact town and village forms'. SPPS also replaces the wording 'concentrated in sustainable locations' with 'located in sustainable locations'. The minor text revision does not dilute or substantially add to the policy context.</p>	<p>Principle PCP 3 appears to be working well.</p> <p>However, as this planning principle is not operational policy and has been transposed in the SPPS it does not need to be brought forward in the LDP Plan Strategy. Sustainable forms of development will be addressed through appropriate zonings in the Local Policies Plan.</p>	<p>No comments received from statutory consultees or public respondents to this planning principle.</p> <p>Post consultation consideration As per POP recommendation do not bring forward wording of PCP 3 and address sustainable forms of development through appropriate zonings in the Local Policies Plan.</p>
<p>PCP 4: Balanced Communities</p> <p>A principle rather than policy, but relates to Policy HS 2 to HS 4 (set out below).</p> <p>Promotes the provision of social housing within larger developments, travellers accommodation where there is an identified need and a range of house types and sizes as a means of achieving balanced communities.</p> <p>It also states that where there is a need for Travellers specific accommodation it should be facilitated at specific sites. Suggests the use of planning agreements may be used to secure a portion of social housing in new developments.</p>	<p>SPPS addresses the need to provide balanced communities and generally accords with PCP 4.</p> <p>It recognises the requirement to provide social housing where need is identified by NIHE and reiterates the text in PCP 4.</p> <p>SPPS is further strengthened by Core Planning Principle 'Creating and Enhancing Shared Space'.</p> <p>SPPS is silent on planning agreements to secure social housing within new developments.</p> <p>SPPS promotes guidance contained within Living Places.</p>	<p>Principle PCP 4 appears to be working well, however this planning principle is not currently operational policy.</p> <p>The proposed approach to the provision of social housing in the LDP is dealt with under Policy HS 2 below, and proposed operational policy dealing with travellers accommodation and the mix of house types and sizes in housing developments is dealt with under Policy HS 3 and HS 4 respectively (see below).</p>	<p>No comments received from statutory consultees or public respondents to this planning principle.</p> <p>Post consultation consideration See Policies HS 3 and HS 4 below.</p>

Policy HS 1: Living over the Shop

Promotes the sustainable reuse of existing buildings and promotes 'Living over the Shop' to provide vitality and viability to town centres. Proposals are subject to the provision of a suitable living environment, adequate refuse storage space and acceptable design and materials. A flexible approach to parking may be acceptable in certain circumstances.

SPPS states that residential use above shops and other businesses should be facilitated where appropriate.

Policy HS 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

It is recommended that the wording of Policy HS 1 is brought forward in the LDP Plan Strategy.

NIHE suggested an amendment to this policy to incorporate reductions in parking standards for these units. They see good quality public realm and accessible green space as making these types of unit more appealing for future residents. HED suggested that preference might be given to utilising historic properties, including industrial heritage, for mixed use accommodation over new build, to promote attractive and distinct places to live and invest.

Post consultation consideration

We have proposed to bring forward the wording of Policy AMP 7 and this allows for reduced parking standard in certain circumstances.

Bring forward POP recommendation.

Policy HS 2: Social Housing

Outlines that social housing should be provided as an integral element of new residential developments. This should be delivered through the provision of a mix of house types and size to promote choice and assist in meeting community needs in locations where a need has been identified by NIHE. Relates to principle PCP 4 above.

SPPS recognises the requirement to provide social/affordable housing where need is identified by NIHE.

SPPS states the LDP process will be the primary vehicle to facilitate any identified social housing need by zoning land or through key site requirements, this however does not preclude other sites coming forward through the development management process.

Key Issue 14 deals with the provision of social/affordable housing. The Preferred Option is to zone sites for social/affordable housing in the Local Policies Plan and indicate through key site requirements where a proportion of a housing zoning should be provided as social housing, where a need has been identified. This option also sets out strategic policy requiring that every 10th unit within new housing developments, in settlements where a need has been identified, shall be a social housing unit.

It is recommended that this amended policy approach is brought forward in the LDP Plan Strategy.

Comments received from statutory consultees and public respondents are set out under Key Issue 14.

Post consultation consideration

We will continue to liaise and discuss the policy wording and potential mechanisms for delivering social and affordable housing with the relevant partners as the plan making process progresses, taking account of the NIHE HNA.

Policy HS 3: Travellers Accommodation (as amended)

Provides criteria for the assessment of Travellers Accommodation (a grouped housing scheme, a serviced site or a transit site) identified by a NIHE local housing needs assessment.

The criteria relates to landscaping, site context, environmental amenity and the provision of workspace, play space and visitor car parking. This policy requires a sequential approach in relation to the location of such accommodation.

In addition, a single family traveller transit or serviced site will be approved in exceptional circumstances in the countryside, without a requirement to demonstrate a need.

Traveller Accommodation is referenced in the implementation section of the SPPS. It states that where a need is identified for a transit or a serviced site which cannot be readily met within an existing settlement proposals will have to meet the policy requirements in respect of rural planning policy for social and affordable housing. The criteria listed in HS 3 are repeated in the SPPS.

SPPS does not set out a sequential approach for locating such accommodation but rather states that those proposed in rural locations should be designed to integrate sympathetically with their surroundings. SPPS does not refer to single family traveller transit or serviced sites in the countryside.

Policy HS 3 (as amended) appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

NIHE have indicated that there is no current need for Travellers Accommodation in the Borough.

It is recommended that the wording of Policy HS 3 (as amended) is brought forward in the LDP Plan Strategy and amended to remove the exception for permission in the countryside, without a requirement to demonstrate need, for single family traveller transit or serviced sites to reflect the SPPS.

NIHE requested that Policy HS 3 is adopted without amendment. While they acknowledge that at this time there is no need for Travellers accommodation in the Borough, due to the transient nature of this need group it is not always possible to pre-determine where need may arise. As a Section 75 group it is important that the plan adequately meets the needs of Travellers.

Post consultation consideration

Discuss wording of SPPS with DfI before bringing forward POP recommendation.

Policy HS 4: House Types and Size

This policy complements PPS 7 and requires that new residential developments over 25 units/on sites 1 hectare or above should deliver a mix of house types and sizes to promote balanced

SPPS includes as a Core Planning Principle and as a strategic policy objective the need to provide a variety of house types, sizes and tenures as a means of providing a good quality housing offering and as a way of achieving balanced

Policy HS 4 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

NIHE would like new policy to ensure a mix of

NIHE welcome the retention of Policy HS 4.

They again advocate that Council include Lifetime Home standards for all housing in the LDP. They advise that, currently, all social

communities and create variety and interest. Smaller schemes will be considered on their individual merits.

communities.

SPPS does not specify a threshold.

tenures in all developments tailored to urban and rural locations. This has been dealt with in Key Issue 14 (see Policy HS 2 above) in so far as it relates to social/affordable housing. NIHE also recommended that all dwelling units should be designed to Lifetime Home standards.

Bringing forward policy in the LDP for all housing units to be to Lifetime Home standards was considered to be too onerous within current Building Control Regulations. As a compromise, Key Issue 15, deals with the delivery of housing to meet the needs of people with mobility difficulties. The Preferred Option is to bring forward a new policy that all ground floor apartments in blocks of 2 storey or above should be wheelchair accessible units.

It is recommended that the wording of Policy HS 4 regarding a mix of house types and sizes in new residential developments is brought forward in the LDP Plan Strategy and expanded as per the Preferred Option in Key Issue 15.

housing is developed to Lifetime Homes Standard and achieves Building Control approval. Any additional cost of delivering Lifetime Homes standard housing is minimal, and this is often a Plan requirement for all new housing in GB. Lifetime Homes Standard helps to provide housing that is suitable to meet the changing needs of the population throughout their life, particularly the elderly and will minimise potential for costly and disruptive adaptations. Finally they highlight that the inclusion of Lifetime Homes would contribute to meeting the Community Plan outcome "Our older people are active, respected and supported in their community".

Post consultation consideration

Further to previous consideration in regard to Lifetime Homes we will work closely with the relevant agencies including NIHE and Council's Building Control Department to investigate further how the LDP can promote Lifetime Homes.

We may bring forward amended policy if deemed appropriate.

PPS 13: Transportation and Land Use	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration
<p>General Principle 1: The integration of transportation policy and land use planning should be taken forward through the preparation of development plans and transport plans informed by transport studies</p> <p>General Principle 2: Accessibility by modes of transport other than the private car should be a key consideration in the location and design of development</p> <p>General Principle 3: The process of Transport Assessment (TA) should be employed to review the potential transport impacts of a development proposal</p> <p>General Principle 4: Travel Plans should be developed for all significant travel generated uses</p> <p>General Principle 5: Developers should bear the costs of transport infrastructure necessitated by their development</p> <p>General Principle 6: Controls on parking should be employed to encourage more responsible use of the private car and to bring about a change in travel behaviour</p> <p>General Principle 7: Park and ride and park and share sites should be developed in appropriate locations to reduce the need to travel by car and encourage use of public transport</p> <p>General Principle 8: Land required to facilitate improvements in the transport network should be afforded protection</p> <p>General Principle 9: Reliance on the private car should be reduced through a modal shift to walking, cycling and public transport</p> <p>General Principle 10: Rural public transport schemes should be developed to link rural dwellers to essential facilities and larger settlements</p> <p>General Principle 11: Innovative measures should be developed for the safe and effective management of traffic</p> <p>General Principle 12: The integration of transport and land use planning should seek to create a more accessible environment for all</p>	<p>SPPS incorporates most of these principles within it.</p>	<p>PPS 13 was prepared to assist in the implementation of the RDS and is intended to guide the integration of transportation and land use through the application of 12 General Principles. PPS 13 has, to a degree, been superseded by the RDS 2035 and the SPPS.</p> <p>As PPS 13 does not contain operational planning policy, it is not considered appropriate to replicate the individual General Principles in the LDP. These will instead be incorporated into the Transportation policies in the LDP.</p>	<p>DfI advised that Council should clearly demonstrate how the general principles in PPS 13 have been incorporated into the transportation policies in the LDP.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>

PPS 15: Revised Planning and Flood Risk	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 8)
<p>Policy FLD 1: Development in Fluvial (River) and Coastal flood plains</p> <p>Sets out criteria where development will not be permitted within the 1 in 100 year fluvial flood plain (AEP of 1%) or the 1 in 200 year coastal flood plain (AEP of 0.5%) unless the applicant can demonstrate that the proposal constitutes a specific exception to the policy.</p> <p>The policy also requires developers to submit a Flood Risk Assessment for all proposals. A development proposal within the floodplain that do not constitute an exception to the policy may be permitted where it is deemed to be of overriding regional or sub regional economic importance. This policy also sets out criteria for minor development and flood protection and management measures.</p>	<p>SPPS accords with Policy FLD 1. Para 6.111 specifies the exceptions to general presumption against development in flood plains and the requirements for a flood risk assessment.</p>	<p>Policy FLD 1 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p><i>It is recommended that the wording of Policy FLD 1 is brought forward in the LDP Plan Strategy.</i></p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Policy FLD 2: Protection of Flood Defence and Drainage Infrastructure</p> <p>Policy FLD 2 will not permit development that would impede the operational effectiveness of flood defence and drainage infrastructure or hinder access to enable their maintenance.</p>	<p>SPPS (para 6.123) accords with Policy FLD 2.</p>	<p>Policy FLD 2 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p><i>It is recommended that the wording of Policy FLD 2 is brought forward in the LDP Plan Strategy.</i></p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Policy FLD 3: Development and Surface Water (pluvial) Flood Risk Outside Flood Plains</p> <p>This policy requires a Drainage Assessment to be submitted for all development proposals that exceed any of the following thresholds:</p> <ul style="list-style-type: none"> • A residential development comprising of 10 or more dwelling units • A development site in excess of 1 hectare • A change of use involving new buildings and / or hard surfacing exceeding 1000 square meters in area. <p>There is also a requirement for all development proposals (excluding minor development) to carry out a Drainage Assessment if the proposed development is located in an area where there is evidence of a history of surface water flooding. A drainage assessment will also be required when surface water run-off from the development may adversely impact upon other development or features of importance to nature conservation, archaeology or the built heritage.</p>	<p>SPPS (paras 6.113 – 6.116) accords with Policy FLD 3 and specifies that a Drainage Assessment (DA) will be required for all development proposals that exceed any of the thresholds as specified in the PPS.</p>	<p>Policy FLD 3 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p>The use of Sustainable Drainage Systems (SuDS) in new development is considered under Key Issue 24. The Preferred Option 24 (a) is to promote SuDS within our Borough to manage surface water in all new developments in urban areas where feasible.</p> <p><i>It is recommended that the wording of Policy FLD 3 is brought forward in the LDP Plan Strategy, subject to additional wording to incorporate SuDS.</i></p>	<p>Consultees were supportive of this policy approach through the responses to Key Issue 24.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>
<p>Policy FLD 4: Artificial modifications of watercourses</p> <p>Sets out criteria for the artificial modification of a watercourse, including culverting or canalization operations. Exceptions will only be made where the culverting of short length of a watercourse is necessary to provide access to a development site or part thereof, or where it can be demonstrated that a specific length of watercourse needs to be culverted for engineering reasons and that there are no reasonable or practicable courses of action.</p>	<p>SPPS (para 6.125) accords with Policy FLD 4.</p>	<p>Policy FLD 4 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p><i>It is recommended that the wording of Policy FLD 4 is brought forward in the LDP Plan Strategy.</i></p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration <i>Bring forward POP recommendation.</i></p>

Policy FLD 5: Development in proximity to reservoirs

Sets out criteria in relation to development in proximity to reservoirs for new development, replacement buildings and all other development.

SPPS (paras 6.120 – 6.122) generally accords with Policy FLD 5.

Concerns have been raised that Policy FLD 5 is presently unreasonable, unworkable and outside the remit of Planning. It is considered unduly onerous on the applicant to provide evidence on the safety of a reservoir, rather the focus should be on the regulatory system to ensure that reservoir infrastructure is safe.

It is recommended that the wording of Policy FLD 5 is not brought forward in the LDP Plan Strategy. Further legal opinion may be sought before a final decision is reached on this.

Mixed response from consultees to Council's suggested policy approach to FLD 5.

NIHE recognised the challenges with FLD 5 but feel that a review of the policy would be more appropriate rather than not bringing it forward in the LDP.

DfI Rivers advised Council should have a Local Policies Plan Policy dealing with reservoir flood risk that complies with the SPPS and suggested that they will liaise closely with all councils regarding any departure or additions to FLD 5 to ensure soundness at IE.

Mid Ulster District Council concurred with our recommendation for FLD 5 and considered that further discussion with DfI Rivers was necessary and should focus on a regulatory system to ensure reservoir infrastructure is safe.

Post consultation consideration

Taking account of legal advice in regard to the legality of Policy FLD 5, together with the equivalent provisions in the SPPS, we now consider that the thrust of this policy should be brought forward in the LDP Plan Strategy, in liaison with DfI Rivers.

PPS 16: Tourism	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 6)
<p>Policy TSM 1: Tourism Development in Settlements</p> <p>This policy sets out a general presumption in favour of tourism development in settlements whilst ensuring the development respects the site context, in terms of scale, size and design.</p> <p>Policy TSM 2: Tourist Amenities in the Countryside</p> <p>Focuses exclusively on tourist amenities (defined as an amenity, facility or service provide primarily for tourists but does not include tourist accommodation) in the countryside. The policy covers, 'new proposals' and 'extension of an existing tourist amenity'. Generally the policy is permissively worded to allow for a range of tourist amenities in the countryside. New development will be permitted provided there is locational need or the type of tourist activity requires a rural location. In both cases where buildings are required the scheme should utilise existing buildings or make provision of replacement buildings.</p> <p>Development of regional importance must demonstrate substantial benefits to the locality and it must be supported by a tourism benefit statement.</p> <p>Also refers to an extension of an existing tourist amenity and permits extensions provided their scale and nature do not harm rural character. Reuse of existing buildings is promoted. If it is demonstrated that this is not a feasible option new buildings will be considered and these should integrate with the overall development.</p>	<p>The aim of facilitating tourism development is mirrored in the SPPS but is further simplified to state that there will be a general presumption in favour of tourism development within settlements, subject to meeting normal planning requirements.</p> <p>SPPS requires a balance between the need to facilitate tourist developments in the countryside and safeguarding the environment.</p> <p>SPPS stipulates that all tourism development in the countryside must be carefully managed in the interests of rural amenity however the guiding principle is that appropriate tourism development should be facilitated where it supports rural communities and promotes a healthy rural economy. This principle covers both the creation of new, and the expansion of existing, tourist development.</p>	<p>Policy TSM 1 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p><i>It is recommended that the wording of Policy TSM 1 is brought forward in the LDP Plan Strategy.</i></p> <p>Policy TSM 2 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>Key Issue 11, deals with Accommodating Future Tourism Demand. The Preferred Option is to retain current policy in PPS 16: Tourism <i>and</i> bring forward bespoke policy tailored to the tourism potential of Vulnerable, Sensitive and Opportunity areas within the Borough, which would be identified through the LDP.</p> <p>By taking this approach it could potentially restrict tourist amenities in certain vulnerable/sensitive countryside locations and increase opportunities in identified Tourism Opportunity Zones in the countryside.</p> <p><i>It is recommended that the wording of Policy TSM 2 is brought forward in the LDP Plan Strategy for the remainder of the countryside.</i></p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p> <p>See Key Issue 11 for statutory consultees and public responses.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>
<p>Policy TSM 3: Hotels, Guest Houses and Tourist Hostels in the Countryside</p> <p>States that new or replacement hotels, guest houses and hostels will be permitted in the countryside in 2 circumstances: (i) replacement of an existing rural building or (ii) a new build proposal on the periphery of a settlement. Criteria are set out for each circumstance e.g. buildings to be replaced must be of permanent construction, be of suitable size and must not be listed, and vernacular buildings to be replaced have to demonstrate that they are not capable of being made structurally sound.</p> <p>Proposals for a new build facility on the periphery of a settlement must demonstrate that there is no suitable site within the settlement or nearby settlement and demonstrate that there are no existing opportunities in the locality either through the conversion and re-use of a suitable building or replacement of a suitable building.</p> <p>The development must not dominate or adversely affect the landscape setting of the settlement or otherwise contribute to urban sprawl. A sequential location test is also set out.</p> <p>Applications for change of use or replacement of tourist</p>	<p>SPPS contains a similar principle delivered in a more concise manner and states where there is no suitable site within a settlement a new build hotel, guest house, or tourist hostel may be appropriate on the periphery of a settlement subject to meeting the normal planning requirements.</p>	<p>Policy TSM 3 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>Key Issue 11, deals with Accommodating Future Tourism Demand. The Preferred Option is to retain current policy in PPS 16: Tourism <i>and</i> bring forward bespoke policy tailored to the tourism potential of Vulnerable, Sensitive and Opportunity areas within the Borough, which would be identified through the LDP.</p> <p>By taking this approach it could potentially restrict hotels, guest houses and hostels in certain vulnerable/sensitive countryside locations and increase opportunities in identified Tourism Opportunity Zones in the countryside.</p> <p><i>It is recommended that the wording of Policy TSM 3 is brought forward in the LDP Plan Strategy for the remainder of the countryside.</i></p>	<p>See Key Issue 11 for statutory consultees and public responses.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>

accommodation approved under this policy have to demonstrate that it is no longer viable long term and that sufficient local alternative provision offsets the loss of tourism benefit.

Policy TSM 4: Major Tourism Development in the Countryside – Exceptional Circumstances

States major tourism development will be permitted in the countryside only in exceptional circumstances, 3 tests have to be demonstrated –: exceptional benefit to the tourism industry, a site specific reason for the choice of site and sustainable benefit to the locality.

Policy TSM 5: Self-Catering Accommodation in the Countryside

Such accommodation is permitted in 3 circumstances: (i) units within hotel, self-catering complex, guest house or holiday park; (ii) 3 or more close to tourist amenity and (iii) the restoration of a clachan. Units should be subsidiary in scale and ancillary to the primary tourism use.

Refers to the conditions that will be placed on all permissions for this type of proposal.

Policy TSM 6: New and Extended Holiday Parks in the Countryside

States that a new holiday park or an extension to an existing facility will be granted where it is demonstrated that the proposal will create a high quality and sustainable form of tourism development. Proposals must be accompanied by a layout and a landscaping plan and meet 7 specific criteria.

SPPS advises that the LDP can include policies for major tourism development in the countryside but such proposals must meet the same tests as set out in Policy TSM 4.

SPPS states the importance of allowing self-catering accommodation, particularly in areas where tourist amenities and accommodation have become established or likely to be provided as a result of tourism initiatives, such as the Signature Projects.

SPPS requires new or extended holiday parks to be of a high quality and a sustainable form of tourism development.

Policy TSM 4 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

It is recommended that the wording of Policy TSM 4 is brought forward in the LDP Plan Strategy and the amplification text amended to relate to the new NI Tourism Strategy (when published), rather than the Tourism 'Priorities for Action' Plan.

Policy TSM 5 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

Key Issue 11 deals with Accommodating Future Tourism Demand. The Preferred Option is to retain current policy in PPS 16: Tourism *and* bring forward bespoke policy tailored to the tourism potential of Vulnerable, Sensitive and Opportunity areas within the Borough, which would be identified through the LDP.

By taking this approach it could potentially restrict self-catering accommodation in certain vulnerable/sensitive countryside locations and increase opportunities in identified Tourism Opportunity Zones in the countryside.

It is recommended that the wording of Policy TSM 5 is brought forward in the LDP Plan Strategy for the remainder of the countryside.

Policy TSM 6 appears to be working well and there is no evidence to suggest that it need to be substantially amended.

Key Issue 11 deals with Accommodating Future Tourism Demand. The Preferred Option is to retain current policy in PPS 16: Tourism *and* bring forward bespoke policy tailored to the tourism potential of Vulnerable, Sensitive and Opportunity areas within the Borough, which would be identified through the LDP.

By taking this approach it could potentially restrict new/or extensions to holiday parks in certain vulnerable/sensitive countryside locations and increase opportunities in identified Tourism Opportunity Zones in the countryside.

It is recommended that the wording of Policy TSM 6 is brought forward in the LDP Plan Strategy for the remainder of the countryside.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation

See Key Issue 11 for statutory consultees and public responses.

Post consultation consideration
Bring forward POP recommendation.

See Key Issue 11 for statutory consultees and public responses.

Post consultation consideration
Bring forward POP recommendation.

Policy TSM 7: Criteria for Tourism Development

Sets out design and general criteria that apply to all forms of tourism development e.g. appropriate design and layout solutions, appropriate boundary treatments, compatibility with surrounding land uses, and infrastructure necessary to accompany the proposal.

Due to the strategic nature of the SPPS it does not specify the criteria listed within Policy TSM 7. SPPS states that all tourism development must be of appropriate nature and scale and design of the specific proposal must be appropriate to the site context.

Policy TSM 7 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy TSM 7 is brought forward in the LDP Plan Strategy.

Alternatively, the criteria listed in Policy TSM 7 could form part of an overall general policy in the LDP as they are relevant to other types of development.

Policy TSM 8: Safeguarding of Tourism Assets

States that permission will not be granted for development that would in itself or in combination with existing and approved development in the locality have an adverse impact on a tourism asset such as to significantly compromise its tourism value.

SPPS recognises that there are many diverse features of built and natural heritage that can be regarded as tourism assets. It also repeats the wording of Policy TSM 8.

Feedback from consultees indicates that Policy TSM 8 is generally sound and provides the detail to the thrust of the SPPS.

However, 'tourism value' on its own has proven difficult to quantify at recent planning appeals.

It is recommended that the wording of Policy TSM 8 is expanded to state that development should not have adverse impact on a tourism asset such as to significantly compromise its amenity, setting and tourism value.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration

Bring forward POP recommendation.

HED recommend the wording should be amended to include reference to the historic environment.

Post consultation consideration

It is considered that the proposed amendments are sufficient to protect historic tourism assets, alongside existing archaeology and built heritage policies.

Bring forward POP recommendation.

PPS 17: Control of Outdoor Advertisements	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 9)
<p>Policy AD 1: Amenity and Public Safety</p> <p>Sets out regional planning policy and guidance relating to the display of outdoor advertisements. There are 2 main policy objectives:</p> <ul style="list-style-type: none"> ■ it respects amenity, when assessed in the context of the general characteristics of the locality; and ■ it does not prejudice public safety. <p>PPS 17 should be read in conjunction with policies BH 9, BH 13, and ATC 3 of PPS 6.</p>	<p>SPPS accords with Policy AD 1. The general thrust of the policy approach as set out in the SPPS is to ensure that outdoor advertisements contribute positively to a quality environment and do not prejudice public safety.</p> <p>Paragraphs 6.58, 6.59 and 6.60 make reference to the need to ensure that advertisements do not detract from the unique qualities and amenity of the countryside nor diminish our archaeology or built heritage.</p>	<p>Policy AD 1 is working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>It is recommended that the wording of Policy AD 1 is brought forward in the LDP Plan Strategy but Council should consider the introduction of specific policy wording relating to the control of flashing, scrolling, animated, intermittent or moving digital signage within conservation areas and ATCs.</p> <p>Ensure that the Strategic Advertisement policy conforms with and does not conflict with any retained advertisement policy for the historic environment.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration</p> <p>Bring forward POP recommendation but give consideration to the simplification and integration of all policies relating to advertisements in to a single Advertisement Policy.</p>

PPS 18: Renewable Energy and Best Practice Guidance to PPS 18

Policy RE 1: Renewable Energy Development

Sets out criteria for development that generates energy from renewable resources.

This policy also requires proposals to be located in proximity to the source of the resource needed for that particular technology.

The policy states that the wider environmental, economic and social benefits of all proposals for renewable energy projects are material considerations that will be given significant weight in determining planning applications.

This policy also sets out a number of additional specific criteria in relation to wind energy development.

SPPS

SPPS generally accords with Policy RE 1.

SPPS (para 6.223) introduced a policy change in relation to the adoption of a 'cautious approach' to renewable energy development within areas designated for landscape importance, such as AONBs.

SPPS (para 6.225) also changed the weight to be given to the wider environmental, economic and social benefits from 'significant' to 'appropriate'. The implication of this is that local circumstances are now to be afforded greater weight than before, but not determining weight. SPPS policy in relation to renewable energy is currently being reviewed.

POP Recommendation/Comment

Policy RE 1 appears to be working well and there is no evidence to suggest that it needs to be substantially amended other than to reflect the updated wording of the SPPS.

In Issue 23 dealing with Renewable Energy, Option (a) aims to continue with a policy based approach, incorporating a cautious approach to renewable energy development within designated areas (e.g. AONB). However, it was also expressed that consideration should be given to Option (b) to restrict or prevent certain types of development within areas of sensitive landscapes if these are identified. This will be dependent on responses to Key Issue 33 in the POP.

SONI (the electricity system operator for Northern Ireland) raised the issue of renewable energy developments in close proximity to existing electricity infrastructure 'wrapping around' such infrastructure and compromising or curtailing future network operations/expansions. SONI questioned if this could be addressed in the LDP.

It is considered additional policy criteria could be added to ensure that such developments do not conflict with existing electricity infrastructure. It is recommended that this be raised as a question in the POP.

It is also recommended that Policy RE 1 is kept under review pending the outcome of the public consultation on the POP and the ongoing review of the SPPS in relation to renewable energy.

Responses and Post Consultation Consideration (see Chapter 8)

Broad support from both public and statutory consultees for the suggested policy approach to RE 1.

DfI stated they have commenced a priority review of the SPPS focusing on strategic policy for Renewable Energy – due to be completed by the end of 2018.

Under Key Issue 33, 92% of public respondents were also supportive of increased policy protection to protect exceptional landscapes and areas considered highly sensitive to particular types of development. NIEA also welcomed the proposal to include an assessment of the cumulative impacts of development within the designated areas. Direct link between Policy NH 6 and RE 1.

Mixed response in regards to the need for policy for development in close proximity to existing electricity infrastructure 'wrapping around' future network operations/expansions.

SONI wanted the policy to go further and assess the impact of not only renewables but all development and wants to put the onus on the applicant to demonstrate that they are not in conflict with any future development of such infrastructure.

RES and SSE suggested that there is no need for additional criteria, because of the consultation arrangements inherent to the development management process.

Post consultation consideration

Given the strong support for the preferred options to Key Issues 23, 30 and 33, which involve different policy approaches, we will discuss further with key consultees before considering amendments to Policy RE 1.

We will also take account of the SPPS review when available.

The issue of providing policy to safeguard electricity infrastructure from development that would compromise or curtail future network operations will be considered further.

Policy RE 2: Integrated Renewable Energy and Passive Solar Design (PSD)

Sets out criteria for development proposals which integrate renewable energy technology including micro-generation, and PSD in its layout, siting and design. The policy requiring the provisions of Policy RE 1 to be met and the technology used is to be appropriate to the location.

It outlines that new large scale urban developments, public sector development, and development in the countryside offer the greatest opportunity for such proposals.

SPPS (para 6.219) accords with Policy RE 2 but does not set out policy criteria in regard to integrated renewable energy and passive solar design.

Policy RE 2 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy RE 2 is brought forward in the LDP Plan Strategy, subject to any amendments as a result of the ongoing review of the SPPS in relation to renewable energy.

DfI advised that they are currently undertaking a priority review of the SPPS focusing on strategic policy for Renewable Energy. The review is due for completion by the end of 2018.

Post consultation consideration

We will work closely with the relevant agencies including NIHE and Council's Building Control Department to investigate further how the LDP can promote energy efficient development.

Bring forward POP recommendation and take account of the SPPS review when available.

PPS 21: Sustainable Development in the Countryside	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 6 & 7)
<p>Policy CTY 1: Development in the Countryside</p> <p>A directional policy that signposts the types of developments which are considered acceptable in principle in the countryside, and references the policies (in PPS 21 and elsewhere) that are relevant.</p> <p>States that all proposals must be designed and sited to integrate sympathetically into the landscape and that they should meet other planning and environmental considerations including those for drainage, access and road safety.</p> <p>Advises that if an area is designated as a Special Countryside Area (SCA) then no development will be permitted unless it complies with the specific policy provisions of the relevant LDP.</p>	<p>SPPS does not have an overarching policy like Policy CTY 1 but rather has individual regional strategic policies.</p> <p>Aim of the SPPS with regard to the countryside is to manage development in a manner which strikes a balance between protection of the environment from inappropriate development, whilst supporting and sustaining rural communities.</p> <p>SPPS omits any reference to Dispersed Rural Communities (DRC's) whereas they are referred to specifically in Policy CTY 1.</p> <p>SPPS policy in relation to development in the Countryside is currently being reviewed.</p>	<p>Policy CTY 1 appears to be working well, however it should be amended to reflect the SPPS removal of reference to Dispersed Rural Communities (CTY 2).</p> <p>It is recommended that a directional policy, in line with the thrust of Policy CTY 1, save for reference to DRC's, is brought forward in the LDP Plan Strategy.</p>	<p>DfI advise that they are currently undertaking a review of the SPPS, focusing on Development in the Countryside. The review is due for completion by the end of 2018.</p> <p>Post consultation consideration Bring forward POP recommendation and take account of SPPS review when available.</p>
<p>Policy CTY 2: Development in Dispersed Rural Communities</p> <p>Sets out circumstances where development will be permitted in designated DRC's. Allows for a small cluster or "clachan" style development of up to 6 houses at a focal point in a DRC. This is limited to one cluster per focal point.</p> <p>Appropriate economic, tourism, social or community facilities may also be accommodated in a DRC under CTY 2.</p> <p>Design should be high quality and sympathetic to the rural area.</p>	<p>There is no provision for DRC's in the SPPS.</p> <p><i>Note: Mid & East Antrim currently does not have any designated Dispersed Rural Communities.</i></p>	<p>In order to reflect the SPPS, it is recommended, that Policy CTY 2, regarding development in Dispersed Rural Communities is not brought forward in the LDP Plan Strategy.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration As per POP recommendation do not bring forward wording of Policy CTY 2.</p>
<p>Policy CTY 2a: New Dwellings in Existing Clusters</p> <p>Provides opportunities to gain approval for a dwelling in an existing rural cluster provided the cluster is outside of a farm and consists of 4 or more buildings, 3 of which must be dwellings.</p> <p>The cluster must appear as a visual entity in the landscape and must be associated with a focal point e.g. community building or is located at a cross roads.</p> <p>The site must provide adequate enclosure and be bounded on at least 2 sides with other development in the cluster. The development of the site should not significantly alter the character of the site or countryside and should not impact on residential amenity.</p>	<p>SPPS adopts a policy approach based on clustering, consolidating and grouping new development, particularly new residential development, with existing established buildings.</p> <p>SPPS policy for new dwellings in existing clusters is less detailed than Policy CTY2a in the criteria to be adhered to, however, the main provisions are detailed and no new or additional criteria have been added.</p> <p>SPPS does not detail the types/number of buildings deemed to be a cluster, does not define what constitutes a focal point nor does it state that the site should provide a suitable degree of enclosure or avoid adversely impacting on residential amenity.</p>	<p>Policy CTY2a appears to be working well and there is no evidence to suggest that it needs to be substantially amended. However, unlike the other policies in PPS 21 it lacks any justification and amplification.</p> <p>It is recommended that the wording of Policy CTY 2a is brought forward in the LDP Plan Strategy.</p> <p>In addition it is recommended that amplification is provided to:</p> <ul style="list-style-type: none"> state buildings or focal points within settlements cannot be used to support proposals; explain that the list of focal points is not exhaustive; explain that a suitable cluster depends on physical proximity as well as visual linkages; and provide direction to guidance in Building on Tradition. 	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>
<p>Policy CTY 3: Replacement Dwellings</p> <p>Provides policy for the provision of replacement dwellings where dwelling to be replaced exhibits essential characteristics of a dwelling and all external structural walls are substantially</p>	<p>SPPS is less detailed than Policy CTY 3 however it covers some of the primary themes.</p> <p>It does not mention that agricultural buildings or those of a temporary construction will be</p>	<p>Policy CTY 3 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>In regard to non-listed vernacular buildings,</p>	<p>The majority of statutory consultees and public respondents were supportive of the submission of verifiable evidence, as to the extent of the dwelling, in relation to replacement dwellings. NIEA noted that the</p>

intact.

States that agricultural buildings or buildings of a temporary construction will not be eligible for replacement.

Sets out when a non-residential building can be replaced with a dwelling and deals with replacement of fire damaged dwellings.

Seeks to help retain non-listed vernacular dwellings and promote their sympathetic renovation and continued use rather than replacement. However, exceptions are listed detailing when replacement of such dwellings will be acceptable.

Sets out 5 criteria all replacement proposals must meet including siting, visual impact, high quality design, provision of services and safe access.

Policy CTY 4: The Conversion and Reuse of Existing Buildings

Provides for the conversion of 'a suitable building' to a variety of uses, including use as a single dwelling. The amplification section states this can include school houses, churches and older traditional barns and outbuildings.

Proposals have to be of high design quality and meet 7 criteria, including be of permanent construction, maintain or enhance the building, should not affect the amenities of nearby residents, proposals for non-residential use should be appropriate to a countryside location, all proposals should provide necessary services and safe access. In addition, extensions should be sympathetic to the existing building.

States that buildings of a temporary construction, including agricultural buildings are not eligible for conversion or re-use.

Sets out criteria for the conversion of a traditional non-residential building to more than one dwelling and states that proposals for the conversion of listed buildings will be assessed against PPS 6.

ineligible.

SPPS is silent on the replacement of redundant non-residential buildings with single dwellings where their replacement brings about environmental benefits.

It is also silent on the replacement of fire damaged buildings nor does it include specific criteria for the replacement of non-listed vernacular dwellings, nor criteria on design, services or safe access for all replacement cases.

SPPS refers to unlisted vernacular **buildings** in Para 6.24, but not specifically under the section Development in the Countryside. It states that applications that directly or indirectly affect such buildings will be judged on the scale of any harm or loss and the significance of the heritage asset. SPPS approach is to promote the re-use of previously used buildings.

SPPS separates the policy for conversion and reuse into one for 'residential use' and another for when the end use will be 'non-residential'.

The policy text in SPPS has been revised to clarify the intent of Policy CTY 4 in respect of the historical or architectural merit of a building to be converted/re-used. SPPS therefore refers to 'a locally important building' rather than 'a suitable building' as stated in Policy CTY 4.

Under the policy for the conversion of an existing building to 'residential use', SPPS states that, in cases where an original former dwelling is retained as an ancillary building to the new dwelling, it will not be eligible for conversion back to a dwelling.

SPPS does not provide detailed criteria save for repeating Policy CTY 4 and stating that conversions to a 'non-residential use' should be appropriate in nature and scale to its countryside location.

SPPS (para 6.87) includes the re-use of rural buildings as one of the proposals which will offer the greatest scope for economic development in the countryside.

consultees generally felt that restoration should be encouraged particularly to help safeguard rural assets. Taking this into account it would appear prudent to, as a minimum, retain the wording of CTY 3 in regard to non-listed vernacular dwellings.

It is recommended that the wording of Policy CTY 3 is brought forward in the LDP Plan Strategy and amended to reflect the following:

- A requirement to submit verifiable evidence as to the extent of the original dwelling;
- Remove reference to fire damaged dwellings as per the SPPS;

Relocate and include the criteria for the replacement of non-listed vernacular dwellings within an amended PPS 6 BH 15 built heritage policy.

When Policy CTY 4 terminology, 'a suitable building' was applied, many inappropriate buildings came forward for consideration. The PAC have found that the wording in the SPPS 'a locally important building' takes precedence over the term 'a suitable building'.

In relation to Economic Development, Policy CTY 4 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy CTY 4 is brought forward in the LDP Plan Strategy and amended to take account of the SPPS and therefore separated into policies for residential and non-residential end uses, to refer to 'a locally important building' and to state that a former dwelling previously replaced and retained as an ancillary building to the new replacement dwelling will not be eligible for conversion back into residential use.

In addition this amended policy should signpost proposals for the conversion and reuse of non-listed vernacular buildings to an amended PPS 6 BH 15 built heritage policy.

development of ruins or other buildings within an AONB could change the character of these remote areas. HED advocated a heritage led approach to the reuse and conservation of historic buildings and signposted their published guidance 'Historic Buildings of Local Importance.' NIHE were unsupportive as they felt that an unduly restrictive policy may promote greenfield development.

The majority of statutory consultees and public respondents agreed that reference to fire damaged dwellings should be removed as per the SPPS. There was also support for relocating and including the criteria for the replacement of non-listed vernacular dwellings within an amended PPS 6 BH 15 built heritage policy.

Post consultation consideration

In regard to NIHE's comments, it is considered that a more restrictive replacement policy should not lead to increased greenfield development in the countryside.

Further discuss policy wording for non-listed vernacular dwellings with DfI and HED before bringing forward POP recommendation.

Two thirds of statutory consultees and public respondents agreed the policy wording should be amended to reflect SPPS.

One public respondent considered the SPPS change in wording would provide little clarification on the policy as both terms are equally ambiguous. HED and some public respondents advocate Council identifying buildings of local importance in their area.

Broad support for Council's suggested amendments to CTY 4 to ensure protection of sustainable economic development within the countryside.

Post consultation consideration

Discuss with DfI and HED before bringing forward POP recommendation.

Policy CTY 5: Social and Affordable Housing

Current planning policy normally resists groups of dwellings in the countryside but this policy is an exception, allowing registered Housing Associations approval for up to 14 dwellings, subject to a specific social/affordable housing need being demonstrated by NIHE which cannot be met within an existing settlement.

Proposals have to be adjacent or near to a small settlement and a sequential test will be applied in terms of location.

Proposals must be sited and designed to integrate with their surroundings and meet other planning criteria and policy requirements.

Criteria relating to proposals in Dispersed Rural Communities is also provided and it is stated that only one group will be permitted in close proximity to any particular rural settlement.

SPPS is not as prescriptive as Policy CTY 5 and refers to development of a small group where the number will depend upon the identified need and the ability to integrate with its surroundings, rather than 'no more than 14 dwellings'.

Unlike Policy CTY 5 it does not state that applications must be made by registered Housing Associations, nor does it set out a sequential test in terms of locating an acceptable site.

SPPS also does not limit such proposals to only one group in close proximity to any particular rural settlement.

Policy CTY 5 appears to be working well and there is no evidence to suggest that it needs to be substantially amended. Such proposals have been limited in this Borough to date and it is anticipated that the new LDP and subsequent reviews should identify sufficient sites within settlements to meet NIHE need.

It is recommended that the wording of Policy CTY 5 is brought forward in the LDP, save for reference to Dispersed Rural Communities.

Statutory consultees agreed that applications should only be made by a registered housing association and that dwellings should be limited to 14. NIHE believed this will ensure that properties are allocated to those in housing need and that the limit of 14 dwellings will protect the character of the rural settlement. NIHE also considered only one such grouping should be allowed in close proximity to any given settlement.

Public respondents were more divided in relation to CTY 5. One respondent considered that over prescriptive policies would hinder the ability to meet future challenges. Another felt that private landowners should be permitted to make applications for social housing on a voluntary basis, as this could help release land for social housing.

Post consultation consideration
Further discuss with DfI and NIHE before bringing forward POP recommendation.

Policy CTY 6: Personal and Domestic Circumstances

This policy is centred on permitting dwellings in the countryside for those who may have special personal or domestic circumstances.

Includes criteria which requires the applicant to demonstrate compelling and site specific reasons as to why they need a dwelling in a particular rural location.

SPPS is less prescriptive than Policy CTY 6. Whilst it requires the applicant to demonstrate compelling and site specific reason for a dwelling as well as demonstrating there are no alternative solutions, it does not go on to refer to the level/type of detail required.

Policy CTY 6 appears to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy CTY 6 is brought forward in the LDP.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation.

Policy CTY 7: Dwellings For Non-Agricultural Business Enterprises

This policy provides opportunity for an established non-agricultural business in the countryside to secure permission for a dwelling in circumstances where one of the firm's employees must live on site.

Site specific need for a dwelling must be demonstrated and if the business has been operating successfully without a dwelling, the need for accommodation must be justified.

The dwelling should be located beside or within the boundaries of the business and integrate. It will also be subject to an occupancy condition.

SPPS is similar but less detailed than Policy CTY 7.

SPPS refers to 'an employee of the business' rather than 'one of the firm's employees'.

SPPS does not include criteria relating to siting or integration and does not refer to approvals being subject to an occupancy condition.

Policy CTY 7 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.

It is recommended that the wording of Policy CTY 7 is brought forward in the LDP, with a slight amendment to reflect the SPPS to refer to 'an employee of the business' rather than 'one of the firm's employees'.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation.

Policy CTY 8: Ribbon Development

This policy resists ribbon development in the countryside but allows for the development of a small gap site, sufficient only to accommodate up to a maximum of 2 houses within a built up frontage and provided this respects existing development patterns.

SPPS is similar but less detailed than Policy CTY 7.

SPPS states that councils may bring forward policies in respect of the development of a small gap site within an otherwise substantial and continuously built up frontage.

Concerns have been raised about the inconsistency in the interpretation of Policy CTY 8, particularly in regard to the wording of 'a line of 3 or more buildings without accompanying development to the rear' and the types of buildings that can be counted as part of the built up frontage. For example, domestic garages may

The majority of respondents agreed that only substantial buildings should be counted as part of a built up frontage and that the policy should include a visual test. NIHE and NIEA supported the stronger policy test in order to protect the character and visual amenity of the countryside.

<p>Built up frontages are defined as a line of 3 or more buildings along a road frontage (including footpaths or private lanes) without accompanying development to the rear.</p> <p>In relation to economic development, provision is also made for infilling a small gap with an appropriate economic development proposal, including light industry. Such a proposal must meet 4 criteria -: be in keeping with the scale of adjoining development, be of a high design standard, not impact on the amenity of neighbours, and meet other planning and environmental requirements.</p>	
<p>Policy CTY 9: Residential Caravans and Mobile Homes</p> <p>Sets out two circumstances when a temporary residential caravan or mobile home may be acceptable in the countryside: when it is for provision of temporary accommodation pending development of a permanent dwelling or there are compelling and site specific reasons related to personal or domestic circumstances.</p> <p>Permissions are normally subject to a 3-year time limit and the same planning and environmental considerations as a permanent dwelling. Siting and integration policy also have to be met.</p>	
<p>Policy CTY 10: Dwellings on Farms</p> <p>This policy was introduced in recognition of changing farming practices and to help support rural communities. It was considered that there was a continuing need for new dwellings on farms to accommodate those engaged in the farm business and other rural dwellers.</p> <p>To gain permission for a dwelling on a farm, 3 criteria must be met: (i) the farm business must be currently active and established for at least 6 years, (ii) no dwellings or development opportunities should have been sold off from the holding in the previous 10 years and (iii) the new building should visually link/cluster with a group of buildings on the farm.</p> <p>Provision is also set out for siting elsewhere on the farm in 2 cases, either (i) for health and safety reasons or (ii) if there are verifiable plans to expand the farm business at the existing building group.</p> <p>Proposals must also meet the requirements of CTY 13 regarding integration and design, CTY 14 regarding rural character and CTY 16 regarding sewerage disposal.</p> <p>A dwelling under this policy will only be acceptable once every 10 years.</p>	

<p>It does not, define the size of an acceptable gap, nor provide a definition of a substantial and continuously built up frontage unlike Policy CTY 8.</p> <p>SPPS does not have provision for the infilling of a gap site with an economic development proposal.</p>	
<p>SPPS uses similar wording to Policy CTY 9 and sets out the same two circumstances when a temporary residential caravan or mobile home may be acceptable in the countryside.</p> <p>SPPS does not specify that permissions will be subject to a 3-year time limit nor does it include siting, integration, planning or environmental criteria.</p>	
<p>The SPPS reflects the thrust of Policy CTY 10, and restates the 3 main criteria to be met.</p> <p>The requirement to visually link or site a proposed dwelling to cluster with an existing group of buildings on the farm is restated, however the SPPS does not give the option of siting a dwelling at an alternative site away from the farm buildings.</p> <p>SPPS clarifies the original policy intent of Policy CTY 10 by stating, that in addition to the requirement to cluster or visually link, proposals for dwelling houses must also comply with LDP policies in respect of integration and rural character.</p> <p>SPPS is silent on the assessment of a dwelling for those involved in keeping horses for commercial purposes.</p> <p>Finally, following the repeal of Article 3 of the European Council Regulations No. 74/2009, the definition of agricultural activity for the purposes of the SPPS has been updated to that</p>	

<p>not be considered appropriate. A stricter policy for the infilling of a small gap may help reduce the potential number of new single dwellings in the open countryside.</p> <p>It is recommended that the wording of Policy CTY 8 is brought forward in the LDP Plan Strategy to allow the infilling of a gap site with an appropriate economic development proposal.</p> <p>It is also recommended that the remaining wording of Policy CTY 8 is brought forward in the LDP Plan Strategy and amended to:</p> <ul style="list-style-type: none"> clarify that only substantial buildings will constitute part of a substantial and continuously built up frontage; clarify that this is a visual test; clarify that buildings within settlements cannot be used to support proposals for gaps sites in the countryside. 	
<p>Policy CTY 9 appears to be working well and there is no evidence to suggest that it need to be amended.</p> <p>It is recommended that the wording of Policy CTY 9 is brought forward in the LDP Plan Strategy.</p>	
<p>Under Policy CTY 10 it is considered that the standard of evidence to demonstrate an active and established farm seems to be low.</p> <p>It is recommend that the wording of Policy CTY 10 is brought forward in the LDP Plan Strategy, updated to refer to the definition of agricultural activity set out in SPPS and amended to: state exactly what information is required in order to demonstrate what qualifies as an active and established farm e.g. make clear hobby farming will not qualify.</p>	

<p>One public respondent requested clarification on the term 'substantial buildings' in order to prevent uncertainty.</p> <p>HED had concerns regarding criteria to use 'only substantial buildings...as part of a visual test' for development integration in the countryside.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>	
<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>	
<p>In the POP the following question was also posed 'Do you consider that a stricter integration test should be applied to those exceptional sites located elsewhere on a farm?'</p> <p>The majority of statutory consultees and public respondents agreed that a stricter integration test should be applied to those exceptional sites located elsewhere on a farm. Statutory consultees considered this was important to protect the character and visual amenity of the countryside and to prevent the widespread cumulative development within sensitive landscapes (e.g. AONB). NIEA advised caution in this policy approach to ensure that additional pressures are not placed on surrounding woodlands.</p> <p>Public respondents who did not support stricter integration stated the following:</p> <ul style="list-style-type: none"> a stricter integration test should be unnecessary if all other integration and 	

<p>This policy is also used to assess proposals for a dwelling by those involved in keeping horses for commercial purposes.</p>	<p>set out in Article 4 of European Council Regulations (EC) 1307/2013.</p>		<p>design requirements have been met;</p> <ul style="list-style-type: none"> ▪ stricter integration would be unjustifiable in cases where the development of difficult terrain would result in considerable additional expense. <p>Post consultation consideration Bring forward POP recommendation and take account of all comments in developing policy for exceptional sites elsewhere on the farm.</p>
<p>Policy CTY 11: Farm Diversification</p> <p>This policy permits a farm or forestry diversification proposal where it can be demonstrated that is to be run in conjunction with the agricultural operations on the active and established farm.</p> <p>It also sets out criteria which must be met, and states proposals will only be acceptable where they involve the re-use or adaption of existing farm buildings. A new building is only allowed in prescribed exceptional circumstances.</p>	<p>SPPS (para 6.87) accords with Policy CTY 11 and refers to farm diversification and the re-use of existing buildings as proposals which will offer the greatest scope for economic development in the countryside.</p> <p>It also states (para 6.73) that new buildings will only be acceptable in exceptional circumstances.</p>	<p>Policy CTY 11 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p>It is recommended that the wording of Policy CTY 11 is brought forward in the LDP Plan Strategy.</p>	<p>Some public respondents stated the need to be more flexible in relation to start-up and grow-on business developments associated with agri-food production, particularly in the countryside, where thriving rural businesses should be nurtured and helped to remain in situ.</p> <p>Others stated there should be a relaxation of planning policy in the countryside for small businesses.</p> <p>Post consultation consideration Consider whether there is scope to amend this policy in light of the emerging Integrated Economic Development Strategy, particularly as it relates to the agri-food sector.</p>
<p>Policy CTY 12: Agricultural and Forestry Development</p> <p>This policy permits development on an active and established holding and where it can be demonstrated that policy criteria are met. New build proposals will also have to demonstrate that they meet additional criteria.</p>	<p>SPPS (para 6.73) is less detailed than Policy CTY 12, however it accords with Policy CTY 12.</p>	<p>Policy CTY 12 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p>It is recommended that the wording of Policy CTY 12 is brought forward in the LDP Plan Strategy.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>
<p>Policy CTY 13: Integration and Design of Buildings in the Countryside</p> <p>This policy is applied to all development in the countryside and seeks to ensure new buildings in the countryside are visually integrated and are of appropriate design.</p> <p>Sets out 7 circumstances when a new building will be unacceptable, including when it is prominent, lacks natural boundaries, relies on new landscaping, ancillary works do not integrate, the design is inappropriate, fails to blend with natural or built backdrops and in the case of a dwelling on a farm is not visually linked or clustered with existing farm buildings.</p>	<p>SPPS is less detailed than Policy CTY 13 and states that all development in the countryside must integrate into its setting, respect rural character and be appropriately designed.</p>	<p>Policy CTY 13 appears to be working well.</p> <p>It is recommended that the wording of Policy CTY 13 is brought forward in the LDP Plan Strategy but amended to set out when a building will be acceptable rather than when it will be unacceptable.</p> <p>It is also recommended that proposals within the AONB are signposted to the additional criteria in the bespoke policy for the AONB.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>
<p>Policy CTY 14: Rural Character</p> <p>Seeks to ensure all new buildings in the countryside do not result in a detrimental change to, or further erode the rural character of an area.</p> <p>Sets out 5 circumstances when a new building will be unacceptable, including when it is unduly prominent, results</p>	<p>SPPS is less detailed than Policy CTY 14 and states that all development in the countryside must integrate into its setting, respect rural character and be appropriately designed.</p>	<p>Policy CTY 14 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>It is recommended that the wording of Policy CTY 14 is brought forward in the LDP Plan Strategy but amended to set out when a building will be acceptable rather than when it will be</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>

<p>in suburban style build-up, does not respect traditional settlement patterns, creates or adds to ribboning, or ancillary works would damage rural character.</p>		<p>unacceptable.</p> <p>It is also recommended that proposals within the AONB are signposted to the additional criteria in the bespoke policy for the AONB.</p>	
<p>Policy CTY 15: The Setting of Settlements</p> <p>Recognises the importance of landscapes around settlements and how they have a role in maintaining the distinction between town and country.</p> <p>Development that mars the distinction between a settlement and the surrounding countryside or that results in urban sprawl will be refused.</p>	<p>SPPS uses similar wording to Policy CTY 15 and states that development in the countryside must not mar the distinction between a settlement and the surrounding countryside, or result in urban sprawl.</p>	<p>Policy CTY 15 appears to be working well and there is no evidence to suggest that it needs to be substantially amended.</p> <p>It is recommended that the wording of Policy CTY 15 is brought forward in the LDP and amended to state that buildings within settlements cannot be used to justify development in the countryside.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>
<p>Policy CTY 16: Development Relying on Non-Mains Sewerage</p> <p>States the development relying on non-mains sewerage will only be permitted where the applicant demonstrates that it will not create or add to a pollution problem.</p> <p>In areas having a pollution risk, development replying on non-mains sewerage will only be permitted in exceptional circumstances.</p>	<p>SPPS is silent on non-mains sewerage issues. However, the SPPS states within its core planning principles that the adverse environmental impacts of sewerage should be a consideration in all development.</p>	<p>Policy CTY 16 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p>It is recommended that the wording of Policy CTY 16 is brought forward in the LDP Plan Strategy.</p> <p>Alternatively, it could be incorporated in general policy applicable to all development.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>

PPS 23: Enabling Development for the Conservation of Significant Places	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration (see Chapter 9)
<p>Policy ED 1: Enabling Development</p> <p>This policy seeks to provide flexibility to depart from normal planning policy, in order to accommodate unforeseen imaginative development proposals that are for the long term public benefit. The policy relates to significant places, defined as any part of the historic environment that has heritage value.</p> <p>Under this policy proposals involving enabling development relating to the re-use, restoration or refurbishment of significant places will only be permitted where a set of criteria are met. Best Practice Guidance should be used to assess proposals. Planning conditions or a planning agreement are used, as appropriate, to secure the associated public benefit.</p>	<p>The SPPS (para 6.25, 6.26) re-iterates the introductory text to PPS 23 which emphasises the intention and objectives of the policy.</p> <p>SPPS (para 6.27) states that Council's may bring forward LDP policies to provide for flexibility to accommodate unforeseen imaginative development proposals which are clearly in the public interest.</p>	<p>Policy ED 1 appears to be working well and there is no evidence to suggest that it needs to be amended.</p> <p>It is recommended that the wording of Policy ED 1 is brought forward in the LDP Plan Strategy.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>

A Planning Strategy for Rural Northern Ireland	SPPS	POP Recommendation/Comment	Responses and Post Consultation Consideration
Design			(see Chapter 9)
<p>Policy DES 2: Townscape</p> <p>Requires development proposals in towns and villages to make a positive contribution to townscape and be sensitive to the character of the area surrounding the site in terms of design, scale and use of materials.</p> <p>Emphasises the importance of urban design within the built environment and has specific sections regarding housing, alterations and extensions to buildings and shop fronts.</p>	<p>'Good Design' is a regional strategic policy within the SPPS and is also one of the Core Planning Principles identified, alongside 'Place Making'.</p> <p>SPPS recognises the contribution that good design can have on achieving sustainable development by providing safe and attractive places to live, it also calls for roads infrastructure to be considered in relation to good design.</p>	<p>It is recommended that a General Operational Policy will be included in the LDP Plan Strategy promoting good design and urban design criteria developed for key strategic locations taking account of the SPPS Core Planning Principles and other relevant guidance such as Living Places and Creating Places.</p>	<p>No comments received from statutory consultees or public respondents regarding this policy.</p> <p>Post consultation consideration We consider that the policy tests within Policy DES 2 can be subsumed within an overarching design policy. Further discuss with DfI and other statutory consultees before Plan Strategy stage.</p>
<p>Policy DES 10: Landscaping</p> <p>States that a landscape scheme will normally be required for all development proposals involving new building.</p> <p>The basic objective of Policy DES 10 is to sustain and increase a scarce local resource (trees) and to complement the landscaping requirements for built development set out in Policies DES 2 and DES5 (superseded by PPS21).</p>	<p>'Good Design' is a regional strategic policy within the SPPS and is also one of the Core Planning Principles identified, alongside 'Place Making'.</p> <p>SPPS recognises the contribution that good design can have on achieving sustainable development by providing safe and attractive places to live.</p>	<p>It is recommended that a General Operational Policy will be included in the LDP Plan Strategy promoting good design and urban design criteria developed for key strategic locations taking account of the SPPS Core Planning Principles and other relevant guidance such as Living Places, Creating Places and Building on Tradition.</p>	<p>No comments received from statutory consultees or public respondents regarding this policy.</p> <p>Post consultation consideration We consider that the policy tests within Policy DES 10 can be subsumed within an overarching design policy. Further discuss with DfI and other statutory consultees before Plan Strategy stage.</p> <p>N.B. An additional category "Trees and woodland of significant amenity value" is to be included under Policy NH 5 (to be brought forward in the Plan Strategy).</p>
Industry and Commerce			(see Chapter 6)
<p>Policy IC 15: Roadside Service Facilities</p> <p>States that the provision of roadside service facilities on the trunk roads network in the open countryside may be considered acceptable where there is a clear indication of need and subject to any retailing being ancillary to the main petrol filling station use.</p>	<p>SPPS is silent on Roadside Service Facilities. However, it is not listed as one of the specified exceptions to the general presumption against retail development in the countryside (para 6.279 refers to farm shops, craft shops etc.)</p>	<p>It is recommended that the thrust of Policy IC 15 will be included within new Policy on Retailing to be included in the LDP Plan Strategy, subject to confirmation of the status of the policy from DfI.</p>	<p>Public respondents suggested flexibility for local shopping facilities and petrol forecourts outside of development limits.</p> <p>Post consultation consideration Further discuss with DfI before bringing forward POP recommendation.</p>
<p>Policy IC 16: Office Development</p> <p>Sets out policy to facilitate office development in established town centres. This policy applies to office uses falling within Use Class A2 (of the Planning (Use Classes) Order (Northern Ireland) 2015) which provide financial professional and other services which are appropriate in a shopping areas where the services are principally to visiting members of the public.</p> <p>Its aim is to facilitate office development in established town centres in order to retain the vitality and viability of existing urban centres, and resist out of centre office development nodes.</p>	<p>SPPS recognises the importance of town centres and the variety of appropriate uses to be promoted within town centres, including office development.</p>	<p>Partly superseded by PPS 4 in so far as it applies to use Class B1 Uses.</p> <p>It is recommended that the remaining wording of Policy IC 16 in relation to Class A2 Uses (Financial, professional and other services) will be included within new Policy on Town Centres and Retailing to be included in the LDP Plan Strategy.</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>

Policy IC 17: Small Office and Business Development

Sets out policy to facilitate the development of small office and business uses in appropriate locations.

Its aim is to facilitate the development of office and business uses in appropriate locations such as in or adjacent to existing or proposed commercial areas or neighbourhood centres subject to certain criteria.

Minerals

Policy MIN 1: Environmental Protection To assess the need for the mineral resource against the need to protect/conserv

In seeking to achieve an appropriate balance between environmental protection and the need for mineral resources; Policy MIN 1 states that decision making on a particular minerals proposal will take account of all relevant environmental, economic and other considerations.

In regard to environmental considerations, the policy attaches particular weight to safeguarding areas which have been designated for their natural / scientific or built heritage importance. The importance of protecting boglands from commercial peat extraction is also emphasised.

The policy states that extensions to existing mineral workings which minimise environmental disturbance in the countryside will normally be preferred to new workings on greenfield sites.

In regard to mitigation, the policy requires applications to demonstrate measures designed to prevent the pollution of rivers, watercourse and groundwater.

SPPS recognises the importance of town centres and the variety of appropriate uses to be promoted within town centres (and district and local centres identified by the LDP), including small office and business development.

SPPS accords with Policy MIN 1 and reiterates the need to balance the requirement for mineral resources against the need to protect and conserve the environment (paragraph 6.154 and 6.162).

The SPPS addresses the same environmental issues as Policy MIN 1 but provides more policy direction on economic considerations, thereby seeking to achieve a more rounded balance between these aspects of sustainable development as they relate to the minerals sector.

Partly superseded by PPS 4 in so far as it applies to use Class B1 Uses. Guidance in PPS 4 relating to homeworking also needs to be taken into account.

It is recommended that the remaining wording of Policy IC 17 in relation to Class A2 (Financial, professional and other services) and other town centre compatible Sui Generis uses be addressed in the LDP Plan Strategy (as it relates to town centres).

It is recommended that the wording of this policy is updated to reflect the greater detail contained in the SPPS in regard to economic considerations.

It is also recommended that policy is amended to recognise any spatial designations (for example relating to Areas of Constraint on Minerals Development) that may be brought forward in the LDP.

No comments received from statutory consultees or public respondents to this policy.

Post consultation consideration
Bring forward POP recommendation.

(see Chapter 6)

There was general support from public respondents and DfE to carry through MIN 1 with amendments to reflect the SPPS.

It was suggested that policy should require proposals to demonstrate how their carbon footprint is interrogated in line with climate change aspirations and policy.

RSPB recommended that planning permission should not be granted for new or existing peat sites nor should extant permissions be renewed. It was suggested that policy should ensure that biodiversity, environmental integrity and priority habitats/species should be protected.

It was recommended that clear and robust policy tests must be set out so that a criteria can be effectively assessed and measured by the decision maker. Any tests for potential impact on sensitive sites (including those set at European Level through the Habitats Directive) should be appropriately incorporated into any policy wording of the LDP.

It was suggested that underground mining techniques should be recognised for their ability to exploit resources with less surface disruption and should be considered appropriately in policy development.

Post consultation consideration
Further to the previous recommendation we will give consideration to the comments made and engage further with statutory consultees and stakeholders, in bringing forward amended policy through the LDP.

Policy MIN 2: Visual Implications

To have regard to the visual implication of minerals extraction

Specifies the applications for new mineral workings or extensions to existing workings in sensitive landscapes such as AONB/AOHSV will be subject to rigorous examination with particular attention being given to the landscape implications of the proposals.

Where permission for mineral development is granted, the policy seeks to ensure that landscape quality will be protected through appropriate mitigation measures secured through planning conditions.

Policy MIN 3: Areas of Constraint

To identify Areas of Constraint on Minerals Development (ACMD)

Sets out that if for visual, conservation or other reasons, areas require to be protected from mineral developments they will be identified as ACMD.

Specifies that within ACMD there will be a general presumption against granting planning permission for the extraction and/or processing of minerals. It is outlined that exceptions to this policy may be made where the proposed operations are short-term and the environmental implications are not significant. On-site processing facilities are unlikely to be permitted.

Policy MIN 4: Valuable Minerals

Applications to exploit minerals, limited in occurrence and with some uncommon or valuable property, will be considered on their merits

Sets out that there will not be a presumption against the exploitation of discovered minerals that are particularly valuable to the economy.

Outlines that where a proposal lies inside a statutory policy area due weight will be given to the reason for the statutory zoning when making a decision.

SPPS reflects the general thrust of Policy MIN 2.

Further, the SPPS adds that where a designated area such as an AONB covers expansive tracts of land, there should be the consideration of the scope for some minerals development that would avoid key sites and that would not unduly compromise the integrity of the area as a whole or threaten to undermine the rationale for the designation (paragraph 6.158).

SPPS reflects the thrust of Policy MIN 3.

SPPS accords with Policy MIN 4 in that there will not be a presumption against the exploitation of discovered minerals valuable to the economy and that when considering a site within a statutory policy area, due weight will be given to the reason for the statutory zoning (paragraph 6.157).

SPPS also addresses unconventional hydrocarbon extraction which is not mentioned in PSRNI. It reflects the government position that there should be a presumption against unconventional hydrocarbon extraction until there is sufficient and robust evidence on all environmental impacts (paragraph 6.157).

Policy MIN 2 is working well and there is no evidence to suggest that it needs to be substantially amended.

It is recommended that the wording of Policy MIN 2 is brought forward in the LDP Plan Strategy and amended to reflect the more recent provisions of the SPPS.

Policy MIN 3 is working well and there is no evidence to suggest it needs substantially amended.

In Key Issue 12 the Preferred Option is to facilitate minerals development in appropriate locations while safeguarding key landscape and environmental assets through the expansion of existing ACMD and/or designation of new ACMDs.

It is recommended that the wording of Policy MIN 3 is brought forward in the LDP Plan Strategy and amended to reflect the slightly more detailed approach of the SPPS.

Policy MIN 4 is working well and there is no evidence to suggest it needs substantially amended.

It is recommended that the wording of Policy MIN 4 is updated to reflect the SPPS stance with respect to unconventional hydrocarbon extraction.

A number of public respondents supported our approach of carrying through MIN 2 with amendments to reflect the SPPS.

DfE suggested that MIN 2 does not accommodate the development of high value minerals and that any proposal for exploitation/extraction of high value minerals should be considered in light of the proposed activity and not rejected outright.

Post consultation consideration

Discuss with DfE before bringing forward POP recommendation.

A number of public respondents agreed with the LDP approach to carry through MIN 3.

It was suggested that clarification is required around what is meant by the terms "short term" and "not significant".

It was suggested that minerals development has the potential to impact directly, indirectly and cumulatively on areas surrounding ACMDs and hence there should be a presumption against mineral development in these areas too.

DfE recommended that ACMDs should not be utilised to apply blanket bans on exploration activities for high value minerals.

Post consultation consideration

Review comments and give further consideration to the wording of policy and need for clarity in the justification/amplification of the policy. The consideration in Key Issue 12 makes it clear that any designation of ACMDs will take account of the economic need for minerals development as well as environmental and landscape interests.

A number of public respondents supported the LDP approach of carrying through MIN 4 with amendments to reflect the SPPS.

It was recommended that SPPS paragraph 6.157 is replicated in full within the LDP in order to provide clarity with respect to valuable minerals and unconventional hydrocarbon extraction.

DfE suggested there should not be a presumption against exploration of high value minerals in any area including in statutory policy areas.

Policy MIN 5: Mineral Reserves

Surface development which would prejudice future exploitation of valuable mineral reserves will not be permitted

Seeks to ensure that where there are mineral reserves which are considered to be of particular value to the economy and where those reserves have been proven to acceptable standards, surface development which would prejudice their exploitation will not be permitted. Outlines that Mineral Policy Areas in respect of such minerals will be defined by LDPs, where appropriate.

SPPS reflects the thrust of Policy MIN 5.

SPPS adds that areas most suitable for minerals development may be identified in the LDP. Such areas will normally include mineral reserves where exploitation is likely to have the least environmental and amenity impacts, as well as offering good accessibility to the strategic transport network.

Policy MIN 5 is working well and there is no evidence to suggest it needs substantially amended.

It is recommended that the wording of Policy MIN 5 is amended to set out the broad type of areas where the protection of mineral resources is likely to be appropriate.

Post consultation consideration

Bring forward POP recommendation. Engage further with DfE with regard to the issue of exploration for valuable minerals.

It was suggested that the proposed updates to MIN 5 should be supported with definitive mineral safeguarding areas.

DfE suggested that the rationale for continuing with a general policy covering the identification and designation of areas as Mineral Reserve Areas still holds.

However a number of public respondents suggested that policy should not seek to promote minerals development in certain areas as economic considerations should not override environmental or social obligations.

Post consultation consideration

Bring forward POP recommendation taking account of the SPPS which allows for identification of Mineral Reserve Areas.

Policy MIN 6: Safety and Amenity

To have particular regard to the safety and amenity of the occupants of development in close proximity to mineral workings

Sets out the planning considerations that will be taken into account in seeking to safeguard the safety and amenity of people living or working in close proximity to mineral workings. These considerations include:

- Maintaining safe separation distance from existing buildings, particularly where mineral operations involve blasting.
- Maintaining satisfactory standards of amenity;
- Preventing minerals development likely to prejudice public safety through potential for rendering surface land unstable, and conversely, to manage development in proximity to existing minerals operations in the interests of public safety.

SPPS reflects the thrust of Policy MIN 6.

Policy MIN 6 is working well and there is no evidence to suggest it needs substantially amended.

It is recommended that the wording of Policy MIN 6 is updated to reflect the SPPS presumption to refuse planning permission unless the developer can demonstrate how the effects of mineral proposals can be mitigated against.

It is also recommended that policy is amended to recognise any spatial designations (for example relating to Areas of Potential Subsidence, Key Issue 13) that may be brought forward in the LDP

It was suggested that policy should be worded to ensure any significant environmental and amenity impacts arising from minerals development proposals can be mitigated, otherwise refused.

DfE recommended that considerations of safety and amenity should be made in the context of the nature, duration and proximity of any proposed development, and any mitigation measures should be included as part of the proposal.

Post consultation consideration

Bring forward POP recommendation but engage further with DfE on specific concerns.

Policy MIN 7: Traffic

To take account of the safety and convenience of road users and the amenity of persons living on roads close to the site of proposed operations

Sets out that where there would be prejudice to the safety and convenience of road users arising from access to a minerals site or the deficiency of the public road network, then planning permission will normally be refused, unless these matters can be addressed.

SPPS reflects the thrust of Policy MIN 7.

Policy MIN 7 is working well and there is no evidence to suggest it needs substantially amended.

It is recommended that the wording of Policy MIN 7 is brought forward in the LDP Plan Strategy.

A number of statutory consultees and public respondents supported the approach of carrying through Policy MIN 7.

Post consultation consideration

Bring forward POP recommendation.

<p>Policy MIN 8: Restoration To require mineral workings to be restored at the earliest opportunity</p> <p>Ensures that applications for the extraction of minerals must include satisfactory restoration proposals and where practicable such proposals should provide for the progressive restoration of sites.</p>	<p>SPPS reflects the thrust of Policy MIN 8 and it accords with Policy MIN 8 where it states that applications for the extraction of minerals must include satisfactory restoration proposals (paragraph 6.161).</p> <p>The SPPS provides greater detail as to the type of information to accompany planning applications so as to ensure satisfactory restoration of sites subsequent to the completion of operations.</p>	<p>Policy MIN 8 is working well and there is no evidence to suggest it needs substantially amended.</p> <p>It is recommended that the wording of Policy MIN 8 is brought forward in the LDP Plan Strategy and updated to reflect the SPPS.</p>	<p>It was recommended that policy ensures that sites are restored in order to enhance biodiversity.</p> <p>DfE suggested that in all cases restoration should be designed to secure the long-term safety and stability of the site and to prevent pollution.</p> <p>Post consultation consideration Bring forward POP recommendation and consider potential amendments to policy in light of comments made.</p>
<p>Tourism</p>			<p>(see Chapter 6)</p>
<p>Policy TOU 5: Advance Direction Signs</p> <p>Sets out that signs directing visitors to tourist attractions will generally be permitted, subject to amenity and safety criteria. Advises that further guidance is available from Roads Service.</p>	<p>SPPS is silent on advance direction signs.</p>	<p>It is recommended that this policy is removed as such signs are regulated by Transport NI (formerly Roads Service).</p>	<p>No comments received from statutory consultees or public respondents to this policy.</p> <p>Post consultation consideration As per POP recommendation do not bring forward wording of Policy TOU 5.</p>
<p>Public Services and Utilities</p>			<p>(see Chapters 7 & 8)</p>
<p>Policy PSU 1: Community Needs</p> <p>Requires development plans to allocate sufficient land to meet the anticipated needs of the community in terms of health, education and other public facilities. Emphasis on best possible use of existing sites.</p>	<p>SPPS does not directly deal with this topic however the following Core Planning Principles in the document are relevant:</p> <ul style="list-style-type: none"> Provide safe, secure, accessible age-friendly environments; Encourage and support quality, environmentally sustainable design; Better connect communities with safe pedestrian movements; Integrate land-use planning and transport. 	<p>Feedback from consultees involved with health, education and community facilities provision indicated that strategic policy in the LDP Plan Strategy should allow identification and safeguarding of specific locations for health, education and community facilities where there is a firm proposal e.g. Planning permission will not be granted for alternative uses on lands identified for the provision of education, health, community use or cultural facilities.</p> <p>In addition, there was general consensus from consultees that the LDP Plan Strategy should set out criteria based policy to apply generally across the Borough which supports the delivery of new health, education and community facilities, in locations that encourage active travel and sustainable development and the extension of such facilities.</p> <p>It is recommended that Council bring the policy approach discussed above, in the LDP Plan Strategy.</p>	<p>See Preferred Approach to Education, Health, Community and Cultural Facilities.</p> <p>Post consultation consideration Bring forward POP recommendation.</p>
<p>Policy PSU 3: Transport Facilities</p> <p>This policy relates to proposals necessary for the improvement of strategic transportation facilities such as regional ports and airports.</p> <p>It states that development plans will zone adequate land for the known requirements of such a facility, and adds that development proposals adjacent to such facilities which would</p>	<p>SPPS (para 6.247) accords with Policy PSU 3.</p> <p>It also adds that ‘the developed coast’ includes existing major developments such as ports.</p>	<p>Superseded by 'Control of Development in Airport Public Safety Zones' (insofar as it relates to Public Safety Zones).</p> <p>In relation to the remaining aspect of ‘Ports’, it is recommended Policy PSU 3 is brought forward in the LDP Plan Strategy or a new bespoke policy for Larne Port brought forward to replace Policy PSU 3. This also needs to take into consideration any</p>	<p>DfI highlighted the importance of promoting Larne Port as a Gateway and ensuring there is sufficient land zoned for its expansion.</p> <p>DfI also noted that Chapter 10 of the POP did not include information relating to the Port of Larne. They stated that sea ports present both major economic and environmental issues which should be addressed through</p>

seriously jeopardise their future expansion should not be permitted.

Policy PSU 8: New Infrastructure

This policy relates to the need for new infrastructure including major extensions to existing facilities, roads, sewerage treatment works, water sources or electricity generators.

It includes criteria for consideration in determining such applications.

Policy PSU 10: Development at Risk

This policy states that development will not normally be permitted in areas known to be at serious risk from flooding, coastal erosion or land instability.

Under this policy new development in coastal areas will not normally be permitted where expensive engineering works would be required to either protect development on land subject to coastal erosion, or defend land at risk from coastal flooding.

Under this policy, development proposals will be determined with account being taken of known hazards of land instability which would affect the development of the site or would as a result of development pose a potential threat to neighbouring areas. In certain circumstances specialist assessments may be required to determine the stability of the ground and identify any remedial measures required to deal with any instability. The policy also outlines the circumstances when planning permission will normally be refused in regard to issues around land instability.

Policy PSU 11: Overhead Cables

Sets out criteria for the siting of electricity power lines and other overhead cables in terms of visual impact on the environment with particular reference being given to designated areas of landscape and townscape character.

SPPS generally accords with the thrust of Policy PSU 8 but the detailed criteria is not referred to.

It states that the developed coast includes existing major developments such as ports, isolated industrial units and power stations.

SPPS (para 6.42, 6.46) accords with Policy PSU 10 in regard to a presumption against development in major at risk areas. However, SPPS explicitly states that development will not be permitted in areas of the coast known to be at risk from flooding, coastal erosion, or land instability.

SPPS does not explicitly state that new development in coastal areas will not normally be permitted where expensive engineering works would be required in coastal locations.

In relation to land instability, the SPPS does not explicitly address specialist assessments or circumstances where planning permission will be refused.

SPPS (6.46) reinforces Policy PSU 10 by stating that LDPs should identify areas of the coast known to be at risk from flooding, coastal erosion, or land instability where new development should not be permitted.

SPPS accords with Policy PSU 11 but adds (para 6.250) that any proposal for the development of new power lines should comply with the 1998 International Commission on Non-Ionizing Radiation Protection (ICNIRP).

SPPS also adds that such proposals will be considered having regard to potential impact on amenity and should avoid areas of landscape sensitivity, including Areas of Outstanding Natural Beauty (AONBs).

update to Policy CO 2 – Developed Coast.

Partly superseded by PPS 11 (insofar as it applies to applications for WWTW).

For the remaining aspects of the policy, it is recommended that a new bespoke policy is brought forward in the LDP Plan Strategy to replace Policy PSU 8. In a MEA context, this also needs to take into consideration any update to Policy CO 2 – Developed Coast.

Superseded by PPS 15 insofar as it relates to flooding.

Policy PSU 10 seems to be working well and there is no evidence to suggest that it needs to be amended.

It is recommended that the wording of Policy PSU 10 is brought forward in the LDP Plan Strategy subject to the following:

- Exclusion of flood risk as this is dealt with in revised PPS 15;
- Further consultation with Department of Infrastructure in regard to alignment with SPPS;
- Further information that may enable the LDP to spatially identify areas at risk (e.g. from coastal erosion) and to bring forward associated policy to align with SPPS.

Policy PSU 11 appears to be working well and there is no evidence to suggest that it needs to be substantially amended other than to reflect the updated wording of the SPPS.

It is recommended that updated wording to Policy PSU 11 is brought forward in the LDP Plan Strategy to reflect the SPPS wording which includes 'ICNIRP' as a requirement, and to avoid areas of landscape sensitivity. This policy may be combined with any new bespoke policy on 'new infrastructure' (as referred to above) to include broadband infrastructure, telecommunications masts and power lines.

the LDP.

Post consultation consideration
Bring forward POP recommendation.

DfI highlighted the importance of promoting Larne Port as a Gateway and ensuring there is sufficient land zoned for its expansion.

Post consultation consideration
Bring forward POP recommendation.

Broad support for Council's approach to reviewing and bringing forward Policy PSU 10.

DfE recommended that this policy should be carried forward through the LDP.

Post consultation consideration
Bring forward POP recommendation.

Broad support for Council's policy review of PSU 11.

SONI recognised the significance of the SPPS aim in avoiding sensitive areas but highlight difficulty due to demand as it may not always be possible to avoid AONBs because of the nature of the generator and demand locations. SONI recommended additional policy wording that areas of landscape sensitivity be avoided "*where possible*", following a consideration and balancing of all issues.

DfI recommended that any new bespoke policy on overhead cables should reflect wording of the SPPS and also include broadband infrastructure.

HED and public respondents highlighted concerns regarding protection of heritage assets and conservation areas from

			<p>inappropriately sited infrastructure projects.</p> <p>Public respondents also suggested the need to use more underground infrastructure when power lines pose a risk to scenery, wetlands and tourism.</p> <p>SSE believes that the current planning policy for Overhead Cables is sufficient and there is no need for an increased requirement “to avoid areas of landscape sensitivity” and that applications should be considered on a case by case basis.</p> <p>Post consultation consideration Consider statutory consultee comments regarding additional wording and give further consideration to the link between this policy and the preferred option to Issue 33, before deciding whether to bring forward POP recommendation or not.</p>
<p>The Coast</p> <p>Policy CO 1: The Undeveloped Coast</p> <p>Policy CO 1 states that development proposals may only be permitted on the undeveloped coast in the following circumstances:</p> <ul style="list-style-type: none"> (i) where the proposed development is of such national or regional importance as to outweigh any potential detrimental impact to the coastal environment; and (ii) where no feasible alternative site within an existing urban area exists. <p>Within the undeveloped coastal zone, the policy aims to minimise the visual and physical impact of development, maintain high design standards, and keep important public views of the coast free from development.</p> <p>In assessing development proposals which involve coastal protection schemes, particularly on the undeveloped coast, account will be taken of the visual and physical impact of such schemes.</p> <p>The policy will not normally permit development in major risk areas. New development will generally not be acceptable where it would require the provision of expensive engineering works to protect the development from erosion or coastal flooding.</p>	<p>The undeveloped coast policy contained within the SPPS accords with Policy CO 1. Further, SPPS emphasises that LDPs and future adopted Marine Plans should be complementary, particularly with regard to the inter-tidal area.</p>	<p>Bespoke policies tailored to different stretches of the undeveloped coast are an important policy tool to preserve and enhance distinctive heritage assets and landscape quality.</p> <p>It is recommended that the undeveloped coast is defined within the LDP and appropriate policies brought forward in the Plan Strategy taking account of the SPPS. It is also recommended that the Council bring forward bespoke policies that recognise any spatial designations that may be introduced through the LDP.</p>	<p>(see Chapter 10)</p> <p>Broad support for our approach to extant coastal policies contained within a PSRNI.</p> <p>Some comments from the public stressed that impacts of climate change need consideration e.g. flood risk.</p> <p>In a general comment, NIEA stated that there should be a wider acknowledgement of the potential impact both on and from the marine area, in relation to social and economic policy considerations. They stressed that Council must also have regard to the UK Marine Policy Statement (UK MPS) and the Marine Plan for Northern Ireland (when adopted).</p> <p>Post consultation consideration In developing coastal policy, we will consult with DfI Marine Planning Division and engage with adjoining councils, potentially via future coastal forums.</p> <p>Bring forward POP recommendation. (see Key Issues 29 - 31 for reference to issues regarding potential spatial policy designations along the MEA coast).</p>
<p>Policy CO 2: The Developed Coast</p> <p>This policy states that the Developed Coast includes urban areas and other major developments such as ports, isolated industrial units and power stations.</p> <p>This policy seeks to encourage and support development proposals for the enhancement and regeneration of urban waterfronts.</p>	<p>The developed coast policy contained within the SPPS accords with Policy CO 2.</p> <p>Further, SPPS states that development along the developed coast is subject to all other relevant planning policies and emphasises that LDPs and future adopted Marine Plans should be complementary, particularly with regard to the inter-tidal area.</p>	<p>Bespoke policy tailored to different stretches of the coastline are an important policy tool to preserve and enhance distinctive heritage assets and landscape quality along the coast, and within developed sections, to promote the enhancement and regeneration of urban waterfronts.</p> <p>It is recommended that policy is brought forward in the LDP Plan Strategy to take account of the</p>	<p>Broad support for Council’s approach to extant coastal policies contained within a PSRNI.</p> <p>In a general comment, DfI noted that Chapter 10 of the POP does not include information relating to the Port of Larne. They stated that sea ports present both major economic and environmental issues</p>

This policy lists a set of criteria applicable to coastal development proposals within existing urban areas. The listed criteria seek attractive landscaping, the retention and enhancement of public access to the coast, protection of open space, preservation and conservation of natural and built heritage assets, protection and enhancement of views of the sea, and encourages uses which help promote a vibrant and attractive urban waterfront.

Policy CO 3: Areas of Amenity or Conservation Value on the Coast

This policy seeks to protect from development, the parts of the coast, within urban areas, which are important in terms of their amenity or nature conservation.

Under this policy there will be a presumption against inappropriate development on green areas and open space along the coast within existing urban areas. Appropriate development would be considered to be small scale tourist or recreational development in association with existing open space uses.

This policy encourages the enlargement and enhancement of existing amenity open space along the coastline within existing settlements, and promotes the introduction of new amenity areas or habitats in waterfront redevelopment schemes.

Policy CO 4: Access to the Coastline

This policy seeks to encourage schemes which provide or extend public access to the coastline.

This policy states that development which would result in the closure of existing access points will normally only be acceptable where a feasible alternative is provided. Under this policy development proposals to provide or extend access to the coastline will normally be permitted provided that natural and built heritage conservation interests, landscape quality and amenity of the local area are safeguarded.

SPPS (para 6.39) accords with Policy CO 3.

However, the SPPS does not explicitly encourage the enlargement and enhancement of existing amenity open space along the coast within settlements, neither does it explicitly encourage the introduction of new amenity areas or habitats in waterfront redevelopment schemes.

SPPS (para 6.41) accords with Policy CO 4, however does not refer to safeguarding the amenity of the local area.

SSPS (Costal Development) policy in regard to development within the developed coast. It is also recommended that the Council bring forward bespoke policies that recognise any spatial designations that may be introduced through the LDP.

Superseded by PPS 16 Tourism insofar as it relates to tourism development or the protection of tourism assets from inappropriate development.

Superseded by PPS 2 where the policy refers to Policy CON 1 and CON 2 of the PSRNI which relate to the protection of nature conservation interests.

Superseded by PPS 6 where the policy refers to Policy CON 5 of the PSRNI which relates to the protection of historical and archaeological maritime heritage.

Although not formally superseded by PPS 8 where Policy CO 3 relates to areas of public open space, the provisions of PPS 8 would be afforded significant weight in considering development proposals with implications for public open space.

Taking all of the above considerations into account, it is recommended that Policy CO 3 is not brought forward in the LDP.

Policy CO 4 appears to be working well and there is no evidence to suggest that it needs amended.

It is recommended that the wording of Policy CO 4 is brought forward in the LDP Plan Strategy.

which should be addressed through the LDP.

Post consultation consideration

In developing coastal policy, we will consult with DfI Marine Planning Division and engage with adjoining councils, potentially via future coastal forums.

Bring forward POP recommendation and appropriate policy to facilitate any need for tourism development, port activity and infrastructure requirements, whilst taking account of environmental issues.

No comments received from statutory consultees or public respondents regarding this policy.

Post consultation consideration

As per POP recommendation do not bring forward wording of CO 3.

Broad support for Council's approach to extant coastal policies contained within a PSRNI.

Post consultation consideration

It is recommended that the general thrust of Policy CO 4 is brought forward in the LDP Plan Strategy.

12.0

Other Comments



Other Comments and Issues raised

In addition to the comments received in relation to Key Issues, Preferred Options and the Policy Review, a number of additional comments were also received.

From statutory consultees

- **NIEA** – take account of Air Quality problems, Air Quality Management Areas and Smoke Control Areas within the Borough.
- **ABO Wind NI** – proactively incorporate processes to tackle climate change (with renewables and a low-carbon economy at the centre).
- **HED** – review Agricultural Permitted Development regarding agricultural buildings and their impact on the setting of heritage assets.
- **NIHE** – include a development management policy in respect of supported housing within the LDP and acknowledge that applications for supported housing should be prioritised and flexibility applied in the application of residential design standards, due to the specific nature of supported accommodation.
- **NIHE** – introduce planning agreements or conditions attached to planning permissions for major developments, requiring the inclusion of a social clause. These social clauses could provide employment or training opportunities to young people or the long-term unemployed.

Our consideration

- NIEA – 'Improving Air Quality' is included as one of our Sustainability Appraisal Objectives.
- ABO Wind NI – 'Reduce causes of and adapt to Climate Change' is also included as one of our Sustainability Appraisal Objectives.
- HED – This would require a change in Planning Legislation rather than through the LDP.
- NIHE – The issues raised above will be discussed with NIHE before proceeding to Plan Strategy stage.

Other comments considered to be outside the remit of Planning

- The level of rates for businesses is unfair.
- Disrepair of B-Class roads between rural settlements in the Borough.
- Better manage dogs on leads.
- Better access to Ulster way and relaxation of roaming rights.
- Promotion of Gastronomy tourism and linking with local chefs.
- Higher level of protection needed to protect catchment areas of the public water supply.

Our consideration

- Where comments have been received that are not of direct relevance to the LDP, we have sought to pass these on to the relevant Council department, where appropriate.

Site Specific Representations

We received 34 representations during the POP consultation period which contained proposals for specific sites.

Our consideration

- These site specific representations cannot be actively considered at this stage in the development of the Plan, but will be of most relevance when we move on to the Local Policies Plan stage following the adoption of the Plan Strategy. While the Council will retain all representations made in response to the POP, we have advised respondents that site specific representations should be re-submitted in response to the draft Local Policies Plan consultation. It is only at this stage that representations of a site specific nature will be considered.



13.0

Sustainability Appraisal



Sustainability Appraisal (incorporating Strategic Environmental Assessment) **Scoping Report and Interim Report**

Sustainability Appraisal (SA)



The purpose of the Sustainability Appraisal is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of Local Development Plans. It incorporates the more environmentally focused considerations of Strategic Environmental Assessment and is used to assess the POP against a set of objectives and criteria, to evaluate if it is likely to have significant impacts on the environment. It will be updated at each stage of plan preparation.

Your response

Public responses

- Three public responses to the SA were received.
- One respondent supported the overall approach to SA, one did not support the approach, and the other did not make any comment.
- The respondent in support did not elaborate on his support with any further comment.
- The respondent who did not support the overall approach expressed concerns that consideration of Natural

Heritage was confined to a few isolated sites and that the impact of intensive agriculture on biodiversity was not recognised.

Statutory Consultee responses

- 3 Statutory Consultees responded and all supported the overall approach to sustainability appraisal.
- HED agreed the overall approach and the Sustainability Appraisal Framework.
- HED advised on additional context and evidence that should be included in the Scoping Report and recommended some additional Key Sustainability Issues.
- HED provided comments on the Interim Report appraisal of options in relation to Sustainability Objective 14 recommending some changes.
- NIEA was generally content with the Interim Report but highlighted matters that should be considered at the next stage of the Plan in relation to a number of its functions.
- NIEA advised on an additional strategic consideration for Natural Heritage and debated the compatibility of housing and the environmental sustainability objectives. It also made a few comments on the findings of the sustainability appraisal.
- In terms of air quality, NIEA noted that overall there was good coverage of the issues but advised on some additional considerations.
- NIEA Drinking Water Inspectorate referred to Council specific information provided by NI Water.
- NIEA recommended greater reference to marine issues and potential impacts and noted several further documents to refer to in the Scoping Report.
- NIEA highlighted some updates to the context and sources of baseline information for climate change.
- NIEA Water Management Unit was of the view that flooding should be addressed through a separate sustainability objective.

Our consideration

- We will give consideration to all comments received and incorporate as appropriate into future Sustainability Appraisal Reports.



Abbreviations



Term / Abbreviation	Definition
ACMD	Area of Constraint on Mineral Development
AOHSV	Area of High Scenic Value
AONB	Area of Outstanding Natural Beauty
ASAI	Area of Special Archaeological Interest
ATC	Area of Townscape Character
AVC	Area of Village Character
BMAP	Belfast Metropolitan Area Plan
BMA Coastal Area	Belfast Metropolitan Area Coastal Area
DAERA	Department of Agriculture, Environment and Rural Affairs
DfC	Department for Communities
DfE	Department for the Economy
DfI	Department for Infrastructure
DfI TPMU	Department for Infrastructure - Transport Planning Modelling Unit
DfI WDPD	Department for Infrastructure - Water and Drainage Policy Division
EDS	Economic Development Strategy
HED	Historic Environment Division (Department for Communities)
HGI	Housing Growth Indicator
HMC	Historic Monuments Council
HRA	Habitats Regulations Assessment
INI	Invest NI
KSR	Key Site Requirement
KTC	Key Transport Corridor
LDP	Local Development Plan
LLPA	Local Landscape Policy Area
LOTS	Living Over the Shop
LPP	Local Policies Plan
LTS	Local Transport Strategy
MUDC	Mid Ulster District Council
NIEA	Northern Ireland Environment Agency
NIHE	Northern Ireland Housing Executive
NISRA	Northern Ireland Statistics and Research Agency
PRC	Primary Retail Core
PSRNI	A Planning Strategy for Rural Northern Ireland
POP	Preferred Options Paper
PPS	Planning Policy Statement
P&R	Park and Ride
PS	Plan Strategy
QPANI	Quarry Products Association Northern Ireland
R&D	Research and Development
RDS	Regional Development Strategy
RSPB	Royal Society for the Protection of Birds
SA	Sustainability Appraisal
SCA	Special Countryside Area
SEA	Strategic Environmental Assessment
SPPS	Strategic Planning Policy Statement
SuDS	Sustainable Drainage Systems
WwTW	Wastewater Treatment Works

Appendices

APPENDIX A: Public Notice

THE GUARDIAN, JUNE 18, 2017

Local Development Plan 2030 Preferred Options Paper

In accordance with Regulation 10 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, Mid and East Antrim Borough Council hereby gives notice that on Wednesday 14 June 2017, the Council will launch the Preferred Options Paper (POP) for its emerging Local Development Plan for a 12 week period of public consultation which closes on Wednesday 6 September 2017.

The POP is a consultation document designed to promote public debate at an early stage in relation to key strategic planning issues which will influence the preparation of the Council's Local Development Plan.

It provides the vision, strategic objectives, key issues and a range of possible options on how our Council will deliver new development and planned growth for Mid and East Antrim. The Council's preferred options are indicated in the POP together with relevant justification.

The outcome of this public consultation will inform the Plan Strategy, which is the next phase of work on the Local Development Plan.

The POP is being published along with a number of other key supporting documents which are also subject to a 12 week public consultation period. These documents include a Sustainability Appraisal Interim Report (incorporating Strategic Environmental Assessment), a Sustainability Appraisal Scoping Report, an Equality Impact Assessment and a Summary of the POP.

The POP and all relevant supporting documents, including evidence base papers, may be viewed at www.midandeastantrim.gov.uk. The POP will also be available in hard copy for examination between 9.30am - 4.30pm (Monday to Friday) at:

Planning Department County Hall 182 Galgorm Road Ballymena BT42 1QF	The Braid 1-29 Bridge Street Ballymena BT43 5EJ
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Carrickfergus Museum & Civic Centre 11 Antrim Street Carrickfergus BT38 7DG	Smiley Buildings Victoria Road Larne BT40 1RU
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Planning staff will be available at County Hall during normal office hours as part of our public consultation on the POP.

The POP and supporting documentation can be made available in different formats upon request.

Hard copies of all documents are available upon request.

How to respond

We want your comments on the key issues and options identified in the Preferred Options Paper. There are two ways to respond:

1. By using the online survey to the Preferred Options Paper and the online survey to the Sustainability Appraisal Interim Report available on the council's website at www.midandeastantrim.gov.uk; or
2. The Preferred Options Paper Response Form and Sustainability Appraisal Interim Report Response Form which are also available on the Council's web site and can be returned by e-mail to planning@midandeastantrim.gov.uk or by post to Local Development Plan Team, County Hall, 182 Galgorm Road, Ballymena, BT42 1QF.

This consultation will close at 5pm on Wednesday 6 September 2017.


Public and drop-in events

We are also holding a number of public and drop-in events during this period across the Council area and invite interested parties to attend and discuss aspects of the Preferred Options Paper with Planning Officials. Dates of these events are listed below.

*The Public events will commence with a presentation at 2pm and 7pm.

Location	Event type	Date and time	Location	Event type	Date and time
The Braid 1-29 Bridge St, Ballymena BT43 5EJ	Public event*	Thursday 22 June 1pm (afternoon session) 7pm (evening session)	The Goldena Visitor Centre Middle Road, Islandmagee BT40 2SA	Drop-in session	Wednesday 2 August 7pm-9pm
Carrickfergus Town Hall 25 Joy Mount, Carrickfergus BT38 7DN	Public event*	Thursday 29 June 1pm (afternoon session) 7pm (evening session)	Portlengone Community Centre Gortale Road, Portlengone BT44 9JT	Drop-in session	Thursday 3 August 7pm-9pm
Larne Town Hall 1-9 Upper Cross St, Larne BT40 1RZ	Public event*	Thursday 29 July 2pm (afternoon session) 7pm (evening session)	Glacklough Community Centre 60 Cross Road, Carrickagh BT46 0CZ	Drop-in session	Wednesday 9 August 7pm-9pm

Anne Donaghy, Chief Executive
Mid and East Antrim Borough Council
The Braid, 1-29 Bridge Street
Ballymena BT43 5EJ

 Mid & East Antrim Borough Council

www.midandeastantrim.gov.uk/localdevelopmentplan



Have your say

We welcome your comments on the questions posed in our **Local Development Plan Preferred Options Paper**

You can comment by:

The **online survey to the Preferred Options Paper** and **online survey to the Sustainability Appraisal Interim Report** available on the Council's website; or

The **Preferred Options Paper Response Form and Sustainability Appraisal Interim Response Form** also available on the Council's website and which can be returned by e-mail or by post. (Hard copies available on request).

Contact Details:

All responses to this public consultation should be submitted to the Planning team before the close of the consultation on 6 September 2017 via the following options:

By online survey:
consult.midandeastantrim.gov.uk

By Email:
planning@midandeastantrim.gov.uk

By Post:
Local Development Plan Team
County Hall
182 Galgorm Road
Ballymena
BT42 1QF
T: 0300 200 7830



Find out more or come and ask us questions:



Date & Time	Event Type	Location
Thursday 22 June Afternoon (2pm) Evening (7pm)	Public Event	The Braid Ballymena Town Hall 1-29 Bridge St, Ballymena, BT43 5EJ
Thursday 29 June Afternoon (2pm) Evening (7pm)	Public Event	Carrickfergus Town Hall 28 Joymount, Carrickfergus, BT38 7DN
Tuesday 25 July Afternoon (2pm) Evening (7pm)	Public Event	Larne Town Hall 1-9 Upper Cross St, Larne, BT40 1RZ
Wednesday 2 August Evening (7pm-9pm)	Drop-in Session	The Gobbins Visitor Centre Middle Road, Islandmagee, BT40 3SX
Thursday 3 August Evening (7pm - 9pm)	Drop-in Session	Portglenone Community Centre Gortgole Road, Portglenone, Ballymena, BT44 8HT
Wednesday 9 August Evening (7pm-9pm)	Drop-in Session	Glenlough Community Centre 60 Croft Road, Carnlough, Ballymena, BT44 0EX

www.midandeastantrim.gov.uk/pop

APPENDIX C: Statutory Consultation Bodies

Statutory Consultees	Reply Received	Associated Sub-group
Northern Ireland Government Departments		
The Executive Office	No	N/A
Department of Agriculture, Environment and Rural Affairs	Yes	<ul style="list-style-type: none"> NIEA: Environment Marine and Fisheries Group Forest Service (late response not included in analysis)
Department for Communities	Yes	<ul style="list-style-type: none"> Historic Environment Division Historic Monuments Council
Department of Education	No	N/A
Department for the Economy	Yes	<ul style="list-style-type: none"> Minerals and Petroleum Branch Geological Survey of Northern Ireland Economic Strategy Tourism NI
Department of Finance	No	N/A
Department for Infrastructure	Yes	<ul style="list-style-type: none"> Strategic Planning Division Transport Planning and Modelling Unit Roads: Northern Division Rivers Agency Water and Drainage Policy Division
Department for Health	No	N/A
Department of Justice	No	N/A
Adjoining Councils		
Antrim and Newtownabbey Borough Council	Yes	N/A
Mid Ulster District Council	Yes	N/A
Causeway Coast and Glens Borough Council	Yes	N/A
Water/Sewerage Undertaker		
Northern Ireland Water	No	N/A
Northern Ireland Housing Executive		
Northern Ireland Housing Executive	Yes	N/A
The Civil Aviation Authority		
The Civil Aviation Authority	No	N/A
Any person to whom the electronic communication code applies by virtue of a direction given under Section 106(3) of the Communication Act 2003(c)		
A list of 120 persons compiled by LDP team.	No	N/A
Any person to whom a licence has been granted under 10(1) of the Electricity (Northern Ireland) Order 1992(a)		
A list of 69 persons complied by LDP team.	Yes	<ul style="list-style-type: none"> ABO Wind NI Ltd. RES Limited Brookfield Renewables SONI/EirGrid SSE
Any person to whom a licence has been granted under Article 8 of the Gas (Northern Ireland) Order 1996(b)		
A list of 26 persons compiled by LDP team.	No	N/A

