



# Local Development Plan 2032

Draft Plan Strategy

Public Consultation Report

December 2020

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## **Tables**

Amended Table 1, page 49, dPS Part 1

Amended Table 3, page 64, dPS Part 1

## **PUBLIC CONSULTATION REPORT ON REPRESENTATIONS TO THE LOCAL DEVELOPMENT PLAN (LDP) DRAFT PLAN STRATEGY**

### **1.0 INTRODUCTION**

- 1.1 The Local Development Plan 2032 (LDP) for Lisburn & Castlereagh City Council will guide investment decisions and set out policies and proposals for the use, development and protection of land in the Council area.
- 1.2 Part 2 of the Planning Act (Northern Ireland) 2011 provides for the preparation of the Local Development Plan (LDP) which comprises of the following two documents:
- Plan Strategy – providing the strategic framework for the Council area as a whole; and
  - Local Policies Plan – setting out the Council’s local site specific policies and proposals relating to the development and use of land across the Council area.
- 1.3 The draft Plan Strategy was published for public consultation consisting of a pre-consultation period which ran from Friday 11<sup>th</sup> October to Thursday 7<sup>th</sup> November 2019; and formal consultation commencing on Friday 8<sup>th</sup> November 2019 for an extended nine week period up to Friday 10<sup>th</sup> January 2020. The draft Plan Strategy is set out in two parts:
- Part 1 – Plan Strategy
  - Part 2 – Operational Policies
- 1.4 The Council’s vision for the LDP is set out on page 32 of the draft Plan Strategy as follows: *“The Local Development Plan (LDP) will respond to the needs of the community in providing a sustainable economy, society and environment. It will support a thriving, vibrant and connected place in which people live, work, visit and invest; and an attractive, green and quality place which will enhance the wellbeing and quality of life for all.”*
- 1.5 This builds on the Council’s Community Plan 2032 vision, to achieve an empowered, prosperous, healthy, safe and inclusive community. The LDP seeks to fulfil its role as a spatial reflection of the Community Plan by providing a fifteen year framework for delivering sustainable development and policies to shape future growth and support the needs of the community.
- 1.6 Six plan objectives have been developed to deliver the LDP vision and set out what it seeks to achieve over the plan period. These are:
- A: A Quality Place – Enabling Sustainable Communities and Delivery of New Homes**
  - B: A Thriving Place – Driving Sustainable Economic Growth**
  - C: A Vibrant Place – Growing our City, Town Centres, Retailing and Other Uses**
  - D: An Attractive Place – Promoting Sustainable Tourism, Open Space, Sport and Outdoor Recreation**
  - E: A Green Place – Protecting and Enhancing the Historic and Natural Environment**
  - F: A Connected Place – Supporting Sustainable Transport and Other Infrastructure.**
- 1.7 An integral part of the LDP in accordance with the Council’s Statement of Community Involvement (SCI) is to ensure that local communities and stakeholders are fully engaged in the process from the outset. This will assist in managing future growth sustainably by delivering social, economic and environmental benefits for the Council area. The SCI was originally published in April 2016 and further revised in November 2019 and December



2020. It outlines the Council's commitment to working with the community to develop a Plan for the Council area.

- 1.8 Details of how the Council has complied with its SCI regarding consultation requirements of the LDP is contained in a separate report 'Local Development Plan - draft Plan Strategy: Compliance with the Statement of Community Involvement (SCI) (December 2020)'.
- 1.9 In addition a further report details how the draft Plan Strategy has complied with the tests of soundness as contained in the Department for Infrastructure's Development Plan Practice Note 6 Soundness (April 2015), 'Local Development Plan draft Plan Strategy: Self-Assessment of Soundness (December 2020)'.
- 1.10 This Public Consultation Report (PCR) has been prepared in accordance with Regulation 20(2)(g) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, which requires the Council to prepare a statement outlining the number and summary of main issues raised in relation to representations received to the draft Plan Strategy, submitted in accordance with regulation 16(2) of the LDP regulations. A separate report on the counter representations received 'Draft Plan Strategy Counter Representation Report (October 2020)' has also been prepared in accordance with regulation 20(2)(g) of the LDP regulations.
- 1.11 This report is accompanied by a list of all representations (see Appendix A) which were submitted during the formal consultation period on the draft Plan Strategy and takes account of the Department for Infrastructure's Development Plan Practice Note 09 Submission and Handling of Representations. The PCR forms a key document for the Independent Examination, and is part of the assessment of the soundness of the Plan Strategy.
- 1.12 Please note that this PCR refers to a 'Housing and Employment Topic Paper (January 2021)' which has been produced alongside the PCR as supporting evidence which the Council wishes to have considered at independent examination (IE) in accordance with Development Plan Practice Note 09 Submission and Handling of Representations.
- 1.13 The PCR also refers to individual focussed or minor changes as set out in the Council's 'Consultation on Focussed Changes including Minor Changes Schedule (January 2021)' which outlines the proposed changes the Council seeks to make to the draft Plan Strategy, for consideration and discussion at IE.
- 1.14 Note for clarification: Further to closure of the LDP representations and counter representations stages, the Council received written notification from One2One Planning (March 2021) advising of change of contact details in respect of the following representations and counter representations:  
Representations: DPS-066, DPS-122 and DPS-124  
Counter Representations: CR-010, CR-016, CR-017, CR-018, CR-019 and CR-033  
In addition, Representation DPS-126 has been withdrawn.  
Any references to One2One Planning within this Public Consultation Report no longer apply. Further details regarding the change of contact details will be provided to the Planning Appeals Commission following the Department's decision to cause an Independent Examination.

## **2.0 LDP PREPARATION: DRAFT PLAN STRATEGY**

- 2.1 The publication of the Preferred Options Paper (POP) and its Public Consultation Report marked the completion of the first stage of the LDP process. The Preferred Options Paper (POP) outlined the vision, strategic objectives and a range of options for dealing with the key planning issues affecting the Council area.
- 2.2 It identified thirty Key Issues along with the Council's preferred option grouped under six Strategic Objectives accompanied by a suite of supporting documents, comprising:
- 14 Position Papers underpinning the preferred options;
  - Sustainability Appraisal (incorporating Strategic Environmental Assessment) Scoping Report;
  - Sustainability Appraisal (incorporating Strategic Environmental Assessment) Interim Report; and
  - Equality Impact Assessment (EQIA) Screening.
- 2.3 The POP Public Consultation Report, September 2017, was prepared in accordance with Regulation 11(4) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 and detailed the processes involved in consulting on the POP as well as the findings of the consultation. These findings were made available for respondents and the general public and taken into account in the preparation of the draft Plan Strategy.
- 2.4 In accordance with Regulation 20 (2)(f), a statement on how the main issues have been taken into account has been prepared by the Council 'Statement on how POP Representations have been taken into account (October 2020)' (see Appendix B).
- 2.5 The draft Plan Strategy is the second stage of the LDP. This report focuses on representations received to the public consultation and provides a summary of the key issues raised. These are subject to an assessment of soundness at Independent Examination, following which, the Examiner will issue a report of its findings to the Department for Infrastructure which in turn considers this report and issues a binding report to the Council.
- 2.6 The third stage of the LDP is preparation and adoption of the Local Policies Plan which will incorporate detailed site specific proposals for the Plan area. The final stage of the LDP process is monitoring and review, to ensure the Plan's objectives are being achieved and whether any changes are required. A review of the LDP is expected to occur every 5 years from the date of adoption of the Local Policies Plan.

### **3.0 DRAFT PLAN STRATEGY SUPPORTING DOCUMENTS**

3.1 In addition to publication of the draft Plan Strategy which was accompanied by eight Technical Supplements (see Appendix C) the Council published a range of supporting documents, and comment was invited on these using a separate online form. Details of which are provided below.

#### **Draft Sustainability Appraisal (SA)**

3.2 In preparing the LDP Plan Strategy the Council is required to undertake a Sustainability Appraisal (SA) to promote sustainable development through the integration of social, environmental and economic considerations of policies and proposals.

3.3 SA is a continual process running in parallel with the preparation of the LDP from Preferred Options Paper stage through to adoption of the Local Policies Plan. It incorporates the legal requirements of the Strategic Environmental Assessment (SEA) Regulations which places a duty on the Council to consider environmental issues with a view to promoting sustainable development.

3.4 A summary of the representations received in relation to the draft SA is contained in Section 8 of this report.

#### **Draft Habitats Regulation Assessment (HRA)**

3.5 The Habitats Regulation Assessment (HRA) relates to Natura 2000 sites which are areas protected for their conservation value and comprise of:

- Special Protection Areas (SPAs) for protection of certain sites for birds
- Special Areas of Conservation (SACs) for protection of certain natural habitats
- Ramsar sites, which are wetlands of international importance.

3.6 The draft HRA for the Plan Strategy has been produced along with the draft SA to ensure the processes inform each other. Both the draft SA and HRA have been produced by the Shared Environmental Service<sup>1</sup> in conjunction with the Council.

3.7 A summary of the representations received in relation to the draft HRA is contained in Section 8 of this report.

#### **Rural Needs Impact Assessment**

3.8 The LDP Plan Strategy is subject to Rural Proofing through a Rural Needs Impact Assessment (RNIA) to ensure it considers rural needs when developing, adopting, implementing or revising policies, strategies and plans.

3.9 There were no representations received in relation to the RNIA.

#### **Equality of Opportunity and Good Relations**

3.10 The LDP Plan Strategy is accompanied by an Equality Impact Screening Report which examines the likely effects of policies and proposals on the promotion of equality of opportunity between persons of different religious belief, political opinion or racial group.

3.11 There were no representations received in relation to the Equality Impact Screening Report.

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<sup>1</sup> A Council 'Shared Service', within Mid and East Antrim Borough Council

## 4.0 SUMMARY OF CONSULTATION PROCESS

4.1 As stated in paragraphs 1.8 and 1.9 of this report, two additional reports have been prepared to show how the Council has complied with its SCI and the self-assessment of soundness. These documents detail in full the consultation process that was undertaken regarding the preparation and publication of the draft Plan Strategy. However, by way of summary and to provide context, the following paragraphs refer to the consultation process undertaken for the draft Plan Strategy. This was subject to a 13-week period of consultation commencing on the 11 October 2019 running to 10 January 2020 as follows:

- **Pre-Consultation** – This period of pre-consultation ran from Friday 11<sup>th</sup> October 2019 to Thursday 7<sup>th</sup> November 2019. The public was advised that no representations should be made within this period as they would not be considered outside the formal consultation period.
- **Formal Consultation** – This period of formal consultation ran from Friday 8<sup>th</sup> November 2019 to Friday 10<sup>th</sup> January 2020. The public was advised that whilst the formal (statutory) period for consultation is eight weeks, the Council added an additional week to allow for the Christmas period.

### **Launch Event**

4.2 The Launch event took place at the Council's Civic Headquarters at Lagan Valley Island, Lisburn on Friday 11<sup>th</sup> October 2019. The event was opened by the Mayor, Councillor Alan Givan, with a presentation by the Chief Executive, Mr David Burns, the Chair of the Planning Committee, Councillor Jonathan Craig, and the Principal Planner LDP, Lois Jackson. All attendees were provided with a copy of the draft Plan Strategy.

### **Public Notice, Local Advertisement and Press Release**

4.3 In accordance with Regulation 15(d) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 a local advertisement was placed in the Belfast Telegraph for two successive weeks, notifying of its publication, a brief description, where it was available for inspection and how to respond. Details of the drop-in sessions were also provided (see paragraph 4.8 below). Both the pre-consultation and formal consultation period were advertised for two consecutive weeks (4<sup>th</sup> and 11<sup>th</sup> October 2019; and 1<sup>st</sup> and 8<sup>th</sup> November 2019 respectively). In addition, a notice of the draft Plan Strategy was placed in the Belfast Gazette for both the pre-consultation and formal consultation (11<sup>th</sup> October 2019; and 8<sup>th</sup> November 2019 respectively).

4.4 The press release issued on the Council's website on Friday 11<sup>th</sup> October 2019, provided a summary of the launch event and how the public could get involved along with details of the drop-in sessions.

### **Consultees**

4.5 Meetings with statutory consultees, non-statutory consultees and the Stakeholder Group to inform the contents of the draft Plan Strategy were held prior to its launch. All groups were consequently consulted with regards to its publication and how to provide comments and get involved.

### **Section 75 Groups**

4.6 The Council's SCI (which was amended to take account of the extended consultation period for the draft Plan Strategy in November 2019 and further in December 2020 as a result of the consultation on Focussed Changes) refers to the importance of early involvement of Section 75 Groups in the Plan making process, who were invited by email to provide



comments on the draft Plan Strategy. A total of 160 Section 75 groups were informed of the launch of the draft Plan Strategy, with details available to view on the Council’s website and inviting comments during the formal consultation period.

**Community/Voluntary Groups**

- 4.7 A total of 127 Community/Voluntary Groups were invited to attend the draft Plan Strategy drop-in sessions via email, with details of the draft Plan Strategy and supporting documents available to view on the Council’s website. In addition, there were joint events held with the Community Plan Team to inform Community and Voluntary Groups of the LDP and Community Plan process and linkages between them. Details of the joint events are provided in the Table below.

**Community Events/Workshops:**

<b>Date</b>	<b>Type of Event</b>	<b>Topic</b>
18 May 2017	Public event	Launch of Community Plan
4 October 2017	Themed workshop	Our Community
4 October 2017	Themed workshop	Health and Wellbeing
5 October 2017	Themed workshop	Children and Young People
9 October 2017	Themed workshop	The Economy
9 October 2017	Themed workshop	Where We Live
6 November 2017	Themed workshop	Children and Young People
6 November 2017	Themed workshop	Health and Wellbeing
9 November 2017	Themed workshop	The Economy
9 November 2017	Themed workshop	Where We Live
13 November 2017	Themed workshop	Our Community
31 January 2018	LPD and Community Plan Links meeting	All themes
3 May 2018	Themed workshop	Where We Live
11 June 2018	Public launch of Community Plan Action Plan	All outcomes and themes
22 August 2018	LPD and Community Plan Links meeting	All themes
18 September 2018	Themed workshop	Where We Live
6 December 2018	Themed workshop	Where We Live
7 December 2018	LPD and Community Plan Links meeting	All themes
9 January 2019	LPD and Community Plan Links meeting	All themes
23 January 2019	Public consultation event	Action Plan
20 March 2019	Themed workshop	Where We Live
10 May 2019	Workshop with Stratagem	All links between LDP and Community Plan

### **Public Drop-In Sessions**

- 4.8 Fourteen drop-in sessions were held during the pre-consultation and formal consultation period between October and December 2019. These were organised across the Council area on a District Electoral Area (DEA) basis to give people further opportunity to discuss any policy or proposal contained in the draft Plan Strategy. The sessions were held in the Enler Centre, Dundonald; Lough Moss Leisure Centre, Carryduff; Lagan Valley Island, Lisburn; Hillsborough Village Centre; Maghaberry Community Centre; Bridge Community Centre, Lisburn; and Ballymacash Community Centre, Lisburn. Details of the feedback from each event is contained in Appendix D.

### **Display Exhibitions**

- 4.9 Display Exhibitions for the draft Plan Strategy were provided on a permanent basis for the duration of the 13-week consultation period at the Council's Civic Headquarters, Lagan Valley Island; Lisburn LeisurePlex; Dundonald International Ice Bowl; and Lisburn Linen Museum. Hard copies of the draft Plan Strategy were made available on request along with all other relevant supporting documents.

### **Additional Communications**

#### **Summary Paper and Display Panels**

- 4.10 Throughout the engagement process various methods were used to engage the public including a draft Plan Strategy Summary Paper (see Appendix E); and promotional pull-up display panels (see Appendix F).

#### **Online Communications**

- 4.11 The Council's website ([www.lisburncastlereagh.gov.uk/LDP](http://www.lisburncastlereagh.gov.uk/LDP)) was fully utilised in advertising details of the draft Plan Strategy and supporting documents, all of which were available to download from a dedicated webpage. The drop-in sessions were also widely advertised on the Council's website.
- 4.12 In addition, social media was also widely used to publicise the draft Plan Strategy throughout the 13-week consultation period, including the Council's Facebook and Twitter pages (see Appendix G).

## 5.0 REPRESENTATIONS TO DRAFT PLAN STRATEGY AND SUPPORTING DOCUMENTS

5.1 A list of all representations received to the draft Plan Strategy is included in Appendix A. In summary, there were 128 representations to the draft Plan Strategy received via:

- Smart Survey (22);
- Email including online representation response form (99); and
- Hard copy (7).

### **Sustainability Appraisal (SA):**

5.2 There were two individual representations received in relation to the SA Report submitted by the Department of Agriculture, Environment and Rural Affairs (Northern Ireland Environment Agency) who are the statutory consultee on the SA; and the Department for Communities (Historic Environment Division). A further eight representations included comments on the SA Report. Further detail is outlined in Section 8 of this report.

### **Habitats Regulation Assessment (HRA):**

5.3 There were no individual representations received in relation to the HRA Report however the representation received from the Department of Agriculture, Environment and Rural Affairs (Northern Ireland Environment Agency) in relation to the SA (mentioned above) also provided comments on the HRA. A further four representations included comments on the HRA. Further detail is outlined in Section 8 of this report.

### **Rural Needs Impact Assessment**

5.4 There were no individual representations received in relation to the Rural Needs Impact Assessment.

### **Equality Impact Assessment (EQIA):**

5.5 There were no individual representations received in relation to the EQIA Screening Report.

### **Methods of Consultation Responses**

5.6 As referred to previously, there were a number of ways that the public could provide representations to the draft Plan Strategy i.e. using the Council's online survey hosted through Smart Survey; the Council's online representation response form; and written response (email or hard copy in post).

5.7 The majority of the representations were submitted via email with a smaller number by Smart Survey (see paragraph 5.1). All representations were reviewed and considered in relation to the appropriate chapter in the draft Plan Strategy.

5.8 The representation response form for representations to the draft Plan Strategy was designed in accordance with Development Plan Practice Note 09: Submission and Handling of Representations (December 2016). Many respondents did not complete the form but provided a written response. For the purpose of this report their comments have been categorised under 3 groupings i.e.:

- If they considered the draft Plan Strategy to be 'Sound' (S) - respondents answered a clear 'yes' in the Smart Survey, online representation response form or used the term sound in their written response
- If they considered the draft Plan Strategy to be 'Unsound' (U) - respondents answered a clear 'no' in the Smart Survey, online representation response form or used the term unsound in their written response; or

- If they considered the draft Plan Strategy to be neither 'sound' or 'unsound' to be 'Neutral/Other' (N) - respondents either did not answer questions in the Smart Survey or online representation response form, or they provided a mix of both sound or unsound comments or did not refer to either term in their written response.



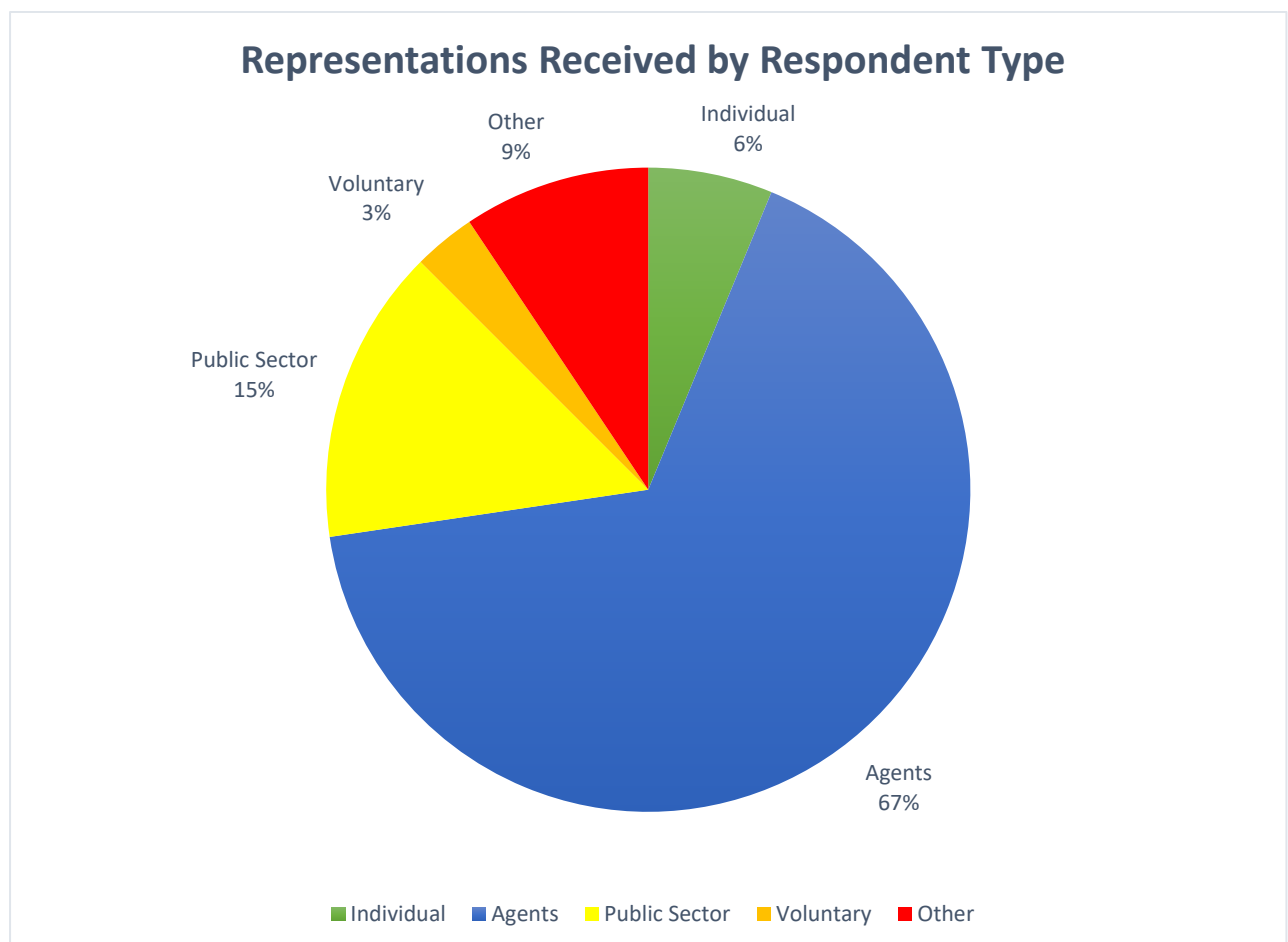
## 6.0 SUMMARY AND ANALYSIS OF REPRESENTATIONS TO DRAFT PLAN STRATEGY

6.1 This report provides an overview of the main findings of the public consultation exercise on the Council's LDP draft Plan Strategy. It is not intended to be a comprehensive report on every comment received, but rather a summary of the key issues raised. A copy of this document is available on the Council's website [www.lisburncastlereagh.gov.uk](http://www.lisburncastlereagh.gov.uk). The Council would like to take this opportunity to thank all those who contributed to the consultation.

6.2 This Public Consultation Report was prepared following a detailed assessment of the comments received to the public consultation of the draft Plan Strategy. The report is structured so as to respond to each Chapter including Policies and Proposals contained within the draft Plan Strategy and sets out for each policy area the main points received.

6.3 As stated previously, a total of 128 representations were submitted, which can be summarised according to the relevant details requested on the smart survey/online representation response form:

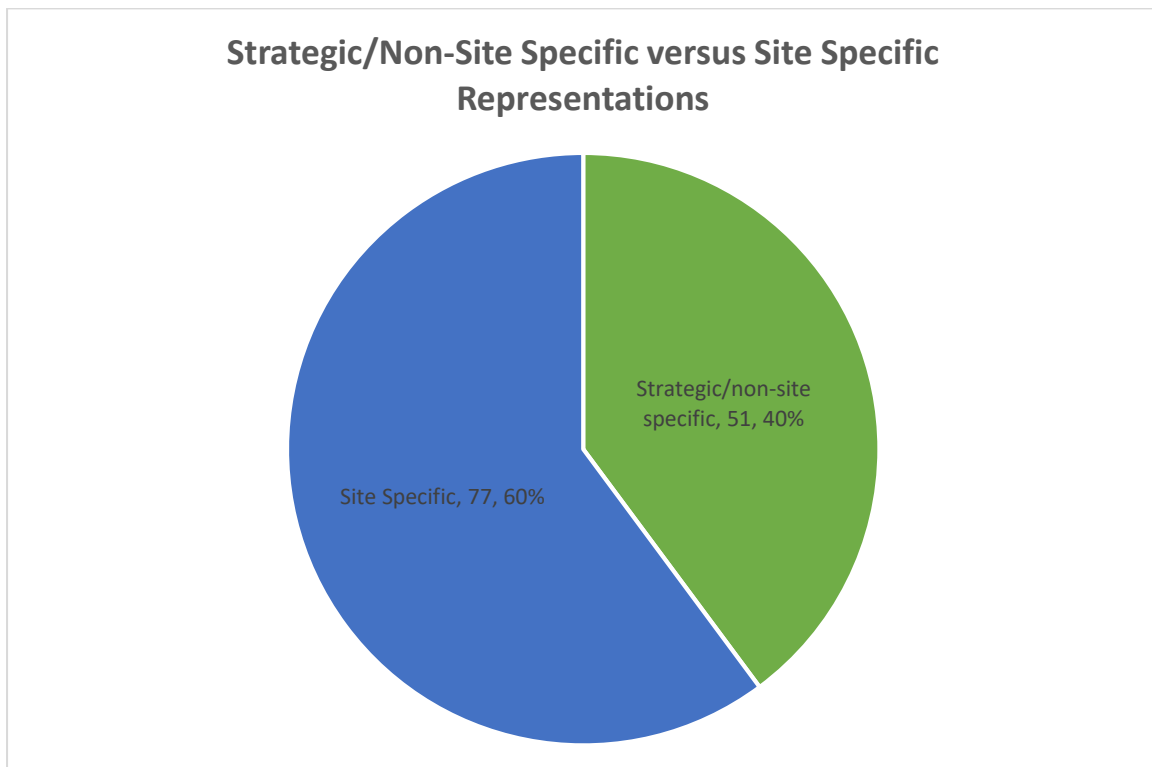
- Individuals - 8
- Planning Consultant/Agent - 85
- Public Sector/Body - 19
- Voluntary/Community Group - 4
- Other - 12



6.4 The majority of representations received (77 or 60%) focus on site specific issues, where individual site location plans were submitted. In order to assist the analysis of representations received, representations were categorised as 'Strategic/non-site specific', i.e. those not accompanied by a site location plan; and 'Site Specific' where the representation was accompanied by a site location plan as demonstrated in the pie chart below:

**Focus of Representation**

- **Strategic/non-site specific** – no site location plan submitted
- **Site Specific** - relating to an identified site where a site location plan submitted

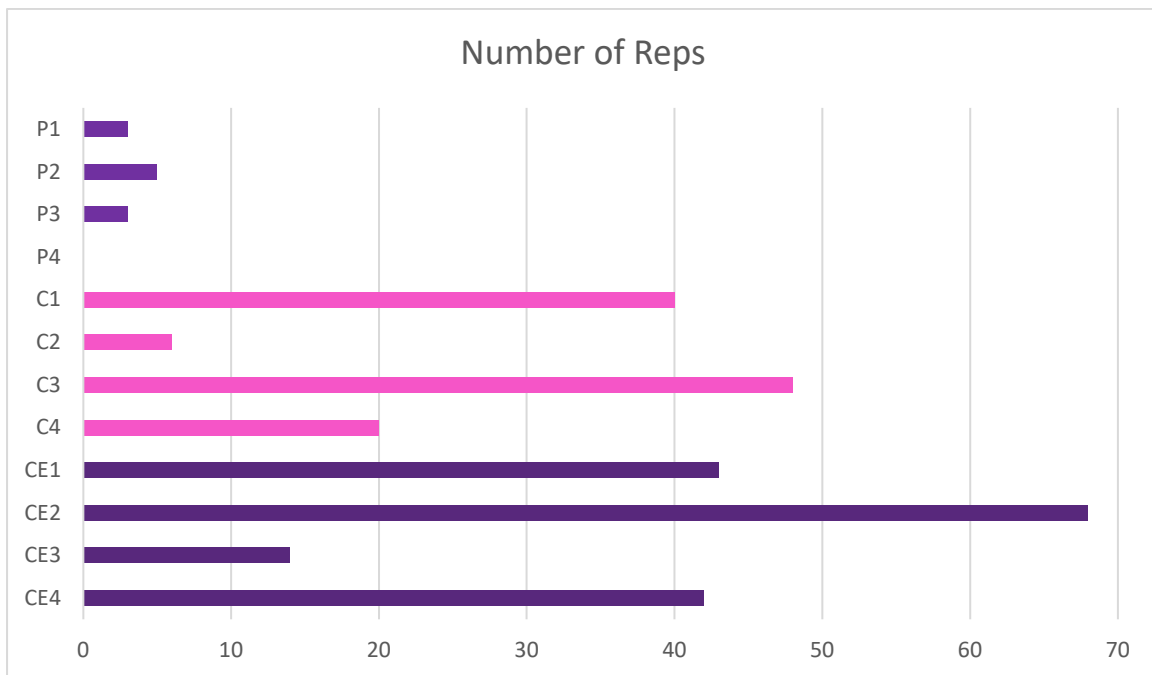


6.5 It is acknowledged that it is not the role of the LDP team to decide which of the site specific representations are considered strategic in nature, therefore no judgement has been made in respect of this. It will be a matter for the Commissioner as part of the Independent Examination to decide how such site-specific representations will be handled in accordance with the PAC procedural guidance [https://www.planningni.gov.uk/index/advice/practice-notes/dppn9\\_representations\\_version\\_2\\_final-4.pdf](https://www.planningni.gov.uk/index/advice/practice-notes/dppn9_representations_version_2_final-4.pdf)

## 7.0 COUNCIL CONSIDERATION AND RESPONSE TO KEY ISSUES RAISED

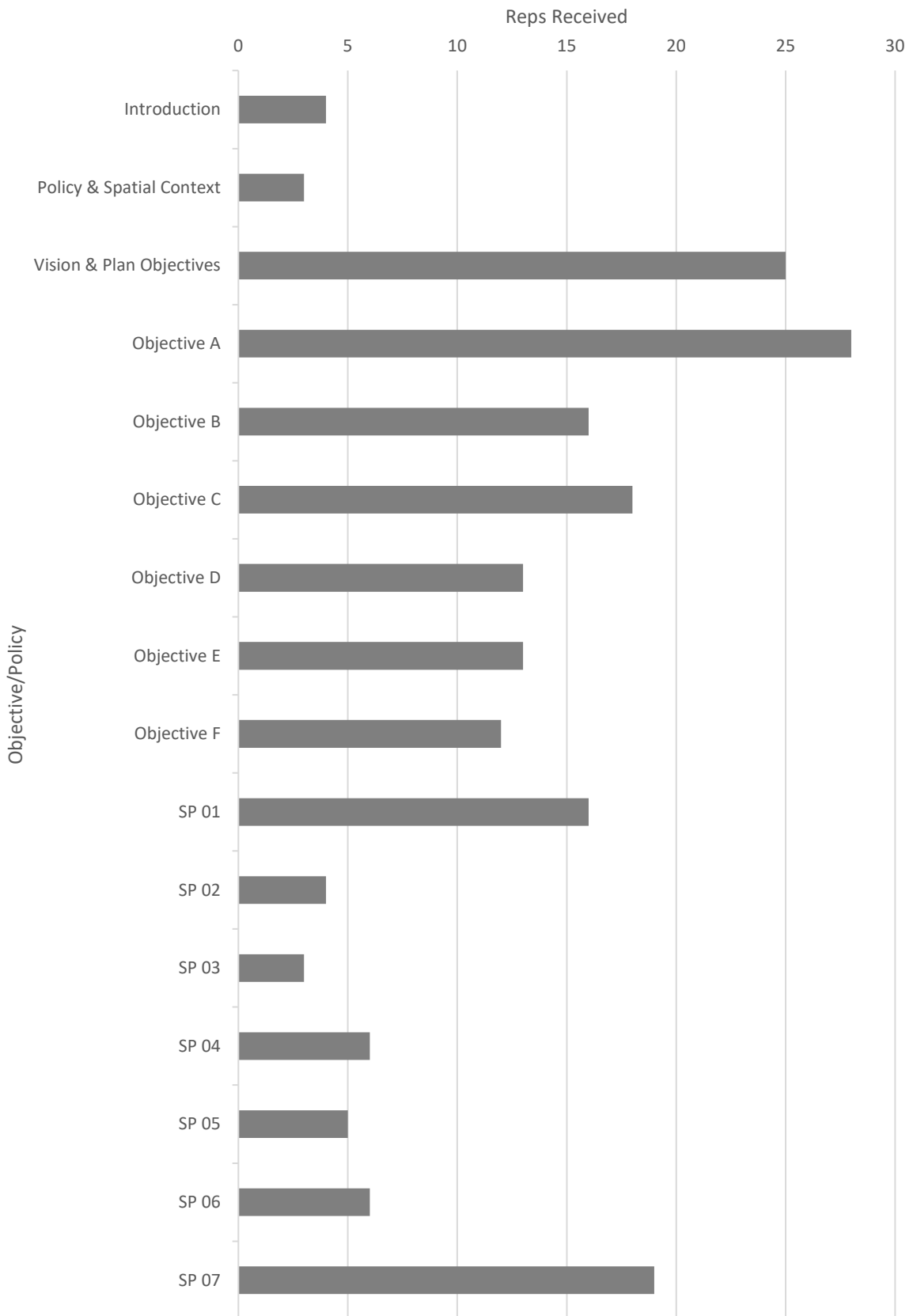
- 7.1 A spreadsheet was used to assist in the analysis of the 128 representations received. As the representations received were submitted in a variety of ways (using online form, email, hard copy) there was no consistency with regards to which test of soundness the representation engaged. The information on the tests of soundness has been input by the LDP team where it has been made explicit by the person who submitted the representation. Where no test of soundness has been referred to, this has been recorded as a N/A.
- 7.2 Of the total representations submitted, only 78 (61%) refer to a particular soundness test. These are further broken down in the following table:

### Representations Referring to Soundness Tests



- 7.3 In terms of whether the representation considered the Plan to be sound or unsound, again a variety of responses were received, some containing a mixture of both sound and unsound. Where it has been made explicit by the person who submitted the representation that they consider the Plan to be unsound, this was recorded. Out of the overall number of representations submitted (128 in total), 85 (67%) refer to the Plan as being unsound; 8 (6%) refer to the Plan being sound; and 35 (27%) providing a neutral response.
- 7.4 The following sections of the report set out the consideration of the Council to key issues raised according to the structure of the draft Plan Strategy.

## Part 1 Introduction - Strategic Policies 01-07



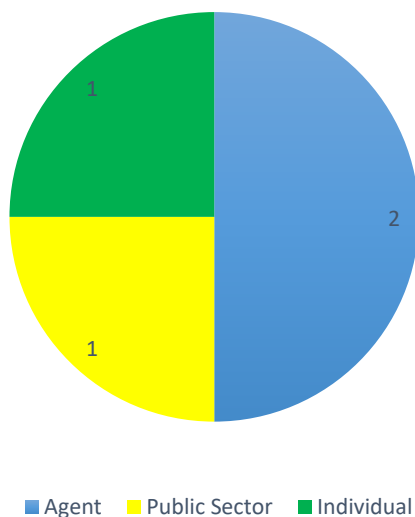


## **PART 1 – PLAN STRATEGY**

### **CHAPTER 1 INTRODUCTION**

There were four representations received in respect of the Introduction (Chapter 1) of the draft Plan Strategy.

#### **Introduction by Respondent Type**



#### **Respondents**

<b>Reference Number</b>	<b>Respondent</b>
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-063	Individual
DPS-083	Agent
DPS-085	Agent

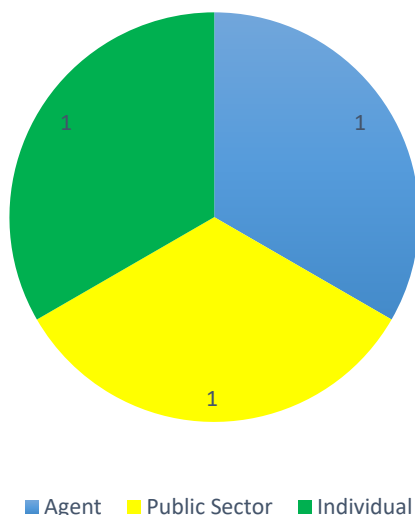
#### **Council Consideration of Issues Raised**

<b>Main Issue(s) Raised</b>	<b>Council Consideration</b>
NIHE supports the Introduction and make reference to lifetime opportunities.	The Council welcomes the supportive comment.
One representation (from individual) welcomes the introduction setting out the requirements for a Sustainability Appraisal and Habitats Regulations Assessment for the Plan, as it was of particular relevance to the preservation of the Feumore Settlement.	The Council welcomes the supportive comment.
Two representations (from Agent on behalf of clients) acknowledge the reference to Sustainable Development in the Introduction.	The Council notes the comment.

## CHAPTER 2 POLICY AND SPATIAL CONTEXT

There were three representations received in respect of the Policy and Spatial Context (Chapter 2) of the draft Plan Strategy.

### Policy & Spatial Context by Respondent Type



#### Respondents

Reference Number	Respondent
DPS-046	NI Water
DPS-063	Individual
DPS-090	Dundonald Green Belt Association

#### Council Consideration of Issues Raised

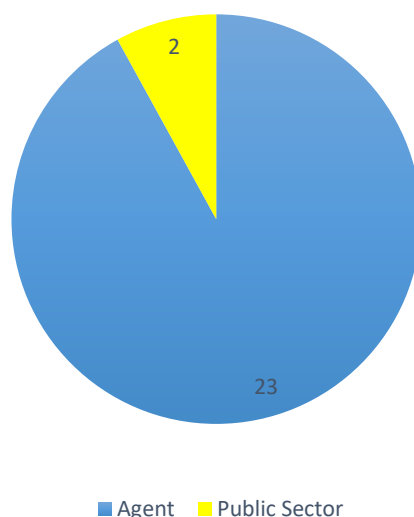
Main Issue(s) Raised	Council Consideration
NI Water raise an issue in relation to the inclusion of the Living With Water Programme (LWWP).	The Council notes the comment and recommendation for its inclusion, however at the time of publication of the dPS the document was not in the public domain. The Council is aware of the recently published Living with Water in Belfast Consultation (November 2020) and notes the Department for Infrastructure's commitment in paragraph 1.4 of said document "After the development and publication of this Plan, the LWWP team will publish an 'Integrated Drainage Investment Planning Guide' and Programme to allow strategic drainage infrastructure plans to be developed across Northern Ireland." The Council will continue to review any relevant LWWP publications up to and as part of the preparation of the Local Policies Plan.
One representation (from individual) acknowledges the SPPS six guiding principles	The Council notes the comment.

<p>including 'Preserving and improving the built and natural environment.'</p>	
<p>Dundonald Greenbelt Association comments that the Plan is not sufficiently supportive of the RDS policies RG6, RG7, RG8, and SFG2 or properly enacts SPPS Guidance on sustainable housing; paragraph 6.137; paragraph 6.139.</p>	<p>The Council considers that the Plan fully supports the RDS policies to strengthen community cohesion (RG6); support urban and rural renaissance (RG7); Manage housing growth to support sustainable patterns of residential development (RG8). The fact that the Council adopted the approach set out in the SPPS at paragraph 6.139 in developing its Strategic Housing Allocation, ensures sustainable development can be achieved. In addition, the draft Plan Strategy has closely adhered to the HGI in its strategic housing allocation to ensure that neighbouring councils are not adversely impacted upon by unsustainable growth.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>

### CHAPTER 3 VISION AND PLAN OBJECTIVES

There were twenty-five representations received in respect of the Council's LDP Vision for the draft Plan Strategy.

#### Vision & Plan Objectives by Respondent Type



#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-022	Newry, Mourne & Down District Council
DPS-032	Turley on behalf of Northern Ireland Federation of Housing Associations (NIFHA)
DPS-048	Turley on behalf of Clanmil Housing Association
DPS-062	TSA Planning on behalf of Unicorn Group
DPS-072	Turley on behalf of Johncorp (No.1) Ltd
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-095	Turley on behalf of Plantation Landowner Group
DPS-098	Gravis Planning on behalf of Fraser Houses Ltd
DPS-100	Turley on behalf of Individual
DPS-101	Turley on behalf of JH Price & Sons
DPS-102	Turley on behalf of Lagan Homes Ltd
DPS-103	Turley on behalf of Viewpoint Developments Ltd
DPS-104	Turley on behalf of Chambers Homes Ltd
DPS-106	Turley on behalf of Individual
DPS-107	Turley
DPS-108	Turley on behalf of Glengard Farms
DPS-122	One2One Planning on behalf of Individual

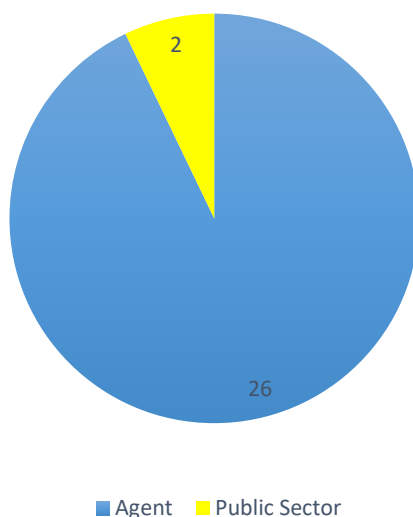
### Council Consideration of Issues Raised

<b>Main Issue(s) Raised</b>	<b>Council Consideration</b>
NIHE support the vision, which referred to sustainable development.	The Council welcomes the supportive comment.
Newry, Mourne & Down District Council mention the Vision in their representation (no detail provided).	The Council notes the comment.
NIFHA support the Council's ambition and drive in terms of its vision.	The Council welcomes the supportive comment.
Turley on behalf of Clanmil Housing support the Council's ambition and drive in terms of its vision.	The Council welcomes the supportive comment.
TSA on behalf of the Unicorn Group consider the Plan Vision and Objectives to be consistent with the RDS and SPPS.	The Council notes the comment.
Nineteen representations (from Agents on behalf of a number of clients) support the LDP vision as set out on page 32 of the dPS.	The Council welcomes the supportive comments.
One representation (from Agent on behalf of individual) makes reference to their interest in the Vision.	The Council notes the comment.

## PLAN OBJECTIVE A: A QUALITY PLACE

There were twenty-eight representations received in respect of Plan Objective A (Chapter 3) of the draft Plan Strategy.

### Plan Objective A by Respondent Type



### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-032	Turley on behalf of Northern Ireland Federation of Housing Associations (NIFHA)
DPS-041	Belfast City Council
DPS-048	Turley on behalf of Clanmil Housing Association
DPS-072	Turley on behalf of Johncorp (No.1) Ltd
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-078	RPS Consulting on behalf of Downshire Estate
DPS-077	Gravis Planning on behalf of Conway Estates Ltd

Reference Number	Respondent
DPS-083	Agent
DPS-085	Agent
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-095	Turley on behalf of Plantation Landowner Group
DPS-098	Gravis Planning on behalf of Fraser Houses Ltd
DPS-100	Turley on behalf of Individual
DPS-101	Turley on behalf of JH Price & Sons
DPS-102	Turley on behalf of Lagan Homes Ltd
DPS-103	Turley on behalf of Viewpoint Developments Ltd

DPS-104	Turley on behalf of Chambers Homes Ltd
DPS-106	Turley on behalf of Individual
DPS-107	Turley

DPS-108	Turley on behalf of Glengard Farms
DPS-122	One2One Planning on behalf of Individual
DPS-124	One2One Planning on behalf of Individual

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE offer their support for Plan Objective A in particular objectives 5 and 6 under the main heading.	The Council welcomes the supportive comment.
Turley on behalf of NIFHA support the Plan Objective in particular action point 5.	The Council welcomes the supportive comment.
Belfast City Council notes LCCC technical supplement 1 (Housing growth study) which acknowledges DfI's advice that HGIs are policy neutral. They are disappointed that proposed housing growth seeks to continue these existing, unsustainable trends, despite recognition that past growth has been based on commuting into Belfast.	The Council wishes to reiterate that in taking consideration of the HGI, this approach is in accordance with regional policy (RDS and SPPS) and also PPS12 Housing in Settlements. In relation to the overall approach this is dealt with further under Strategic Policy SP08 Housing in Settlements.
Turley on behalf of Clanmil Housing specifically support action point number 5 under Plan Objective A which states: <i>"provide appropriate opportunities for housing in settlements with a range of types and tenures, including affordable housing."</i>	The Council welcomes the supportive comment.
Turley on behalf of Johncorp (No.1) Ltd note the relevant Plan Objective to housing.	The Council notes the comment.
Nine representations (Gravis Planning on behalf of a number of clients) state they are generally supportive of the Plan Objectives in principle.	The Council welcomes the supportive comments.
RPS Consulting on behalf of the Downshire Estate state the omission of the subject lands (submitted) is at odds with the Plan Objective A: Delivering a Quality Place.	The Council disagrees with this comment in that having considered the HGI against the Strategic Housing Allocation, no additional lands were necessary for inclusion at Hillsborough. Further detail is provided under Strategic Policy SP08 Housing in Settlements.

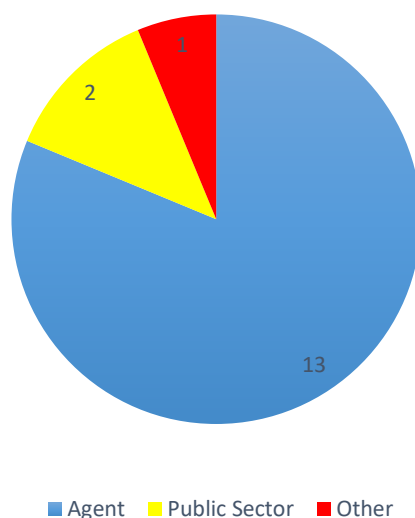
<p>Two representations (from Agent on behalf of clients) notes the Plan could not meet its own objectives or those of the Community Plan which is to support the villages as attractive and vibrant centres.</p>	<p>The Council disagrees with this comment in that Plan Objective A recognises the role of the various levels within the Settlement hierarchy. Point 4 of Plan Objective A states <i>“Support towns, villages and small settlements in the Council area as vibrant and attractive centres providing homes and services appropriate to their role in the settlement hierarchy whilst protecting their identity from excessive development.”</i></p>
<p>Turley on behalf of Plantation Landowner Group state they are generally supportive of the objective but object to the Strategic Housing Allocation (SHA) under SP08. Turley on behalf of JH Price &amp; Sons; Lagan Homes Ltd; Viewpoint Developments Ltd; Chambers Homes Ltd; Turley; Glengard Farms and two individuals state they are generally supportive of the objective but object to the Strategic Housing Allocation (SHA) under SP08.</p>	<p>The Council notes the comment. Further detail on the Strategic Housing Allocation is provided under Strategic Policy SP08 Housing in Settlements.</p>
<p>Two comments (One2One Planning on behalf of individuals) welcomes the Plan Objective A.</p>	<p>The Council welcomes the supportive comment.</p>



## PLAN OBJECTIVE B: A THRIVING PLACE

There were sixteen representations received in respect of Plan Objective B (Chapter 3) of the draft Plan Strategy.

### Plan Objective B by Respondent Type



### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-027	Matrix Planning on behalf of Individual
DPS-041	Belfast City Council
DPS-042	Conexpo (NI) Ltd
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-078	RPS Consulting on behalf of Downshire Estate
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-098	Gravis Planning on behalf of Fraser Houses Ltd
DPS-100	Turley on behalf of Individual
DPS-126	Agent

## Council Consideration of Issues Raised

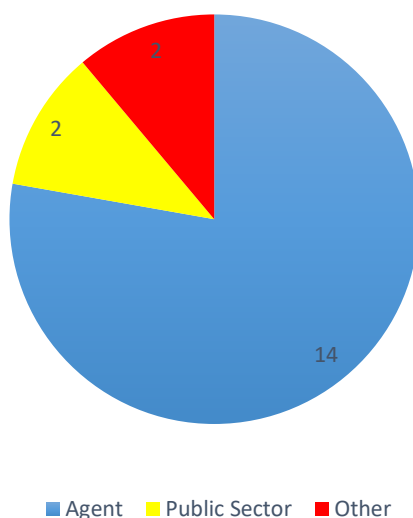
Main Issue(s) Raised	Council Consideration
<p>NIHE comment that they support the Plan Objectives, set out under six themes and aligned to the Community Plan themes and believe this will help provide synergy between the two Plans. Re: Plan Objective B they support the objective to accommodate population growth to ensure a continuous supply of labour and allow the resident population the opportunity to avail of high quality employment opportunities in sustainable locations close to where they live.</p>	<p>The Council welcomes the supportive comments.</p>
<p>Two representations (Matrix Planning and Gravis Planning on behalf of individuals) comment that they were generally supportive of Plan Objective B.</p>	<p>The Council welcomes the supportive comments.</p>
<p>Belfast City Council express concerns under Plan Objective B: A Thriving Place regarding the designation of the strategic mixed use site at West Lisburn/Blaris for housing and employment; the need for housing at this location which was considered not to be highly accessible; reference to the Maze lands stating the full extent of employment land at West Lisburn/Blaris may not be required; and that it appears to be driven by the West Lisburn Development Framework Review (2018).</p>	<p>The Council considers the strategic housing designation at West Lisburn/Blaris to be fully in accordance with the RDS 2035 and mixed use zonings. In particular, RG8: Manage housing growth to achieve sustainable patterns of residential Development (paragraph 3.15) states 'The varied housing needs of the whole community need to be met. This includes the availability of affordable and special needs housing. Housing is a key driver of physical, economic and social change in both urban and rural areas. Strategic planning places emphasis on the importance of the relationship between the location of housing, jobs, facilities and services and infrastructure.' The Council considers the site to be highly accessible and sustainable location, with the proposed Knockmore Link rail halt (to be delivered through the new BMTP and as part of the Local Policies Plan) along with strategic Park &amp; Ride.</p> <p>The Maze lands are in the control of the NI Executive and are not considered to impact upon the mixed use zoning at West Lisburn/Blaris as the proposed uses are as yet unknown. The WLDF review, whilst a material consideration, is only one of a number of factors which indicate this site as being strategically suitable for co-location of both housing and employment.</p>
<p>Conexpo NI provide comment on the significance of the Geo Science sector to the NI economy.</p>	<p>The Council notes the comment.</p>

<p>Nine representations (Gravis Planning and Turley on behalf of a number of clients) state they are generally supportive of the Plan Objectives, including economic prosperity.</p>	<p>The Council welcomes the supportive comments.</p>
<p>RPS Consulting on behalf of the Downshire Estate comment that the commission of the subject lands (around Hillsborough Monument) is at odds with all 6 Plan Strategy Objectives.</p>	<p>The Council disagrees with this comment for the reasons outlined under Plan Objective A.</p>
<p>One representation from Agent objects specifically to SMU01 West Lisburn/Blaris and the lack of demarcation between the lands zoned for industry and housing, stating that there is the potential for industrial lands to impact on housing.</p>	<p>The Council considers the key site requirements of Strategic Policy SMU01 to be sufficiently robust to deal with separation distances between employment land and housing, and for the implementation of appropriate landscaping to provide buffers where necessary. As any future planning application has to be determined on the entire suite of planning policies, along with any necessary environmental or transport assessments, it is considered that the draft Plan Strategy provides a sufficient degree of clarity. It is a requirement of SMU01 that a concept Masterplan to accompany this significant zoning would be required.</p>

## PLAN OBJECTIVE C: A VIBRANT PLACE

There were eighteen representations received in respect of Plan Objective C (Chapter 3) of the draft Plan Strategy.

### Plan Objective C by Respondent Type



### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-018	Les Ross Planning
DPS-021	Individual
DPS-041	Belfast City Council (BCC)
DPS-066	One2One Planning on behalf of Forestside Acquisitions Ltd
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-078	RPS Consulting on behalf of Downshire Estate
DPS-081	Fleming Mounstephen Planning on behalf of Henderson Group
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-098	Gravis Planning on behalf of Fraser Houses Ltd
DPS-100	Turley
DPS-125	Company

## Council Consideration of Issues Raised

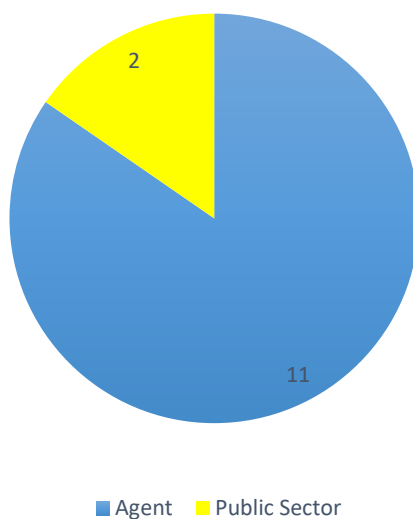
Main Issue(s) Raised	Council Consideration
NIHE comment that they support the Plan Objectives, set out under six themes and aligned to the Community Plan themes and believe this will help provide synergy between the two Plans. Re: Plan Objective C they support the objective to promote the regeneration of our city and town centres as quality places to live, work, shop and visit.	The Council welcomes the supportive comment.
One representation (Les Ross Planning on behalf of client) comments regarding Plan Objective 4C and Strategic Policy SMU03 requesting the latter policy be removed from the draft Plan Strategy as it would be harmful to existing centres and contrary to the SPPS.	The Council would confirm that the Retail Capacity Study (Technical Supplement 5) updated the previous evidence provided in BMAP by confirming that Sprucefield is functioning as a Regional Shopping Centre in accordance with its definition in the Regional Development Strategy 2035.
One representation from an individual comments that Carryduff Town Centre should be enlarged to encourage a denser town centre.	The Council notes the site specific representation. It is considered that the appropriate stage of the Plan process for any amendments to existing designations is the Local Policies Plan stage.
Belfast City Council comments specifically in relation to Policy SMU03 for Sprucefield Regional Shopping Centre. BCC state that the draft strategy and strategic policy for Sprucefield appears inconsistent with the town centre first approach to retail investment and development as recommended in the SPPS.	The Council will respond more specifically in relation to the queries raised under Strategic Mixed Use Designation SMU03 Sprucefield Regional Shopping Centre. However the Council remains firmly of the view that the draft strategy and strategic policy is not at odds with the SPPS which is silent on the issue of Sprucefield. In the absence of any Central Government policy direction, it is left to the Council's LDP to define Sprucefield's role through the identified policy and key site requirements.
One representation (One2One Planning on behalf of Forestside Acquisitions Ltd) comments that there should be recognition of the role of District Centres (Forestside) within Plan Objective C and Strategic Policy SP14 Town Centres, Retailing and Other Uses.	The Council welcomes this point and notes the omission of the District Centre from Plan Objective C. The Council proposes for clarity, as a minor change, to amend Plan Objective C, pages 36 and 92, by insertion of the following: <i>4) Support the role of District and Local Centres in accordance with the retail hierarchy (Figure 5, page 97).</i> (Ref: MC1 Minor Changes Schedule)
Nine representations (Gravis Planning on behalf of a number of clients) state that they are generally supportive of the Plan Objectives.	The Council welcomes the supportive comments.

<p>RPS Consulting on behalf of the Downshire Estate comment that the omission of the subject lands (around Hillsborough Monument) is at odds with all 6 Plan Strategy Objectives.</p>	<p>The Council disagrees with this comment for the reasons outlined under Plan Objective A.</p>
<p>Fleming Mounstephen Planning on behalf of the Henderson Group comment that Plan Objective C supported retailing across the Settlements in the Council area, in contrast to Strategic Policy 14 that supports retailing in City and Town Centres only. The Retail hierarchy also omits any reference to the wide range of local, neighbourhood convenience retailing facilities.</p>	<p>The Council notes this comment in relation to the retail hierarchy. The Council accepts that a wide range of local retailing facilities may be provided through the submission of a planning application in accordance with an existing key site requirement of an extant development plan, however it is not considered necessary to reflect these in the Retail Hierarchy outlined on page 97 of the dPS.</p>
<p>One representation (Turley) state they are in general support of the Plan Objectives.</p>	<p>The Council welcomes the supportive comment.</p>
<p>One representation (from private company) state that Plan Objective 4C should allow for the expansion of Carryduff Town Centre.</p>	<p>The Council notes the comment however would confirm that the Council's position on the designation of town centres should be addressed at Local Policies Plan stage.</p>

## PLAN OBJECTIVE D: AN ATTRACTIVE PLACE

There were thirteen representations received in respect of Plan Objective D (Chapter 3) of the draft Plan Strategy.

### Plan Objective D by Respondent Type



### Respondents

Reference Number	Respondent
DPS-008	Tourism NI
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-078	RPS Consulting on behalf of Downshire Estate
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-098	Gravis Planning on behalf of Fraser Houses Ltd
DPS-100	Turley on behalf of Individual

## Council Consideration of Issues Raised

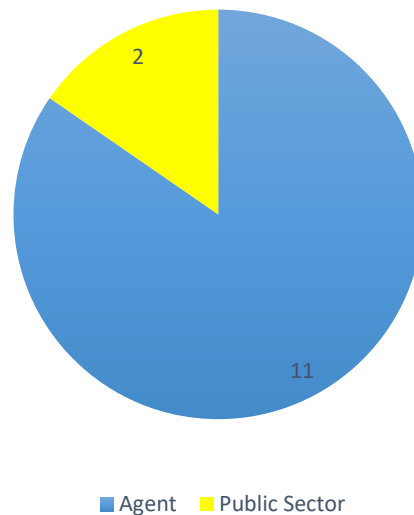
Main Issue(s) Raised	Council Consideration
Tourism NI are supportive of the dPS facilitating tourism development through a sustainable approach with careful protection of the built and natural environment; and policies for sustainable growth of tourism.	The Council welcomes the supportive comment.
NIHE comment that they support the Plan Objectives, which are set out under six themes and aligned to the Community Plan themes and believe this will help provide synergy between the two Plans. Re: Plan Objective D they support the objective to protect and enhance open space recognising its value in promoting health and well-being and resolving flood issues through the introduction of sustainable urban drainage infrastructure.	The Council welcomes the supportive comment.
Nine representations (Gravis Planning on behalf of a number of clients) state that they were generally supportive of the Plan Objectives.	The Council welcomes the supportive comments.
RPS Consulting on behalf of the Downshire Estate comment that the omission of the subject lands (around Hillsborough Monument) is at odds with all six Plan Strategy Objectives.	The Council disagrees with this comment for the reasons outlined under Plan Objective A.
One representation (Turley) state they are in general support of the Plan Objectives.	The Council welcomes the supportive comment.



## PLAN OBJECTIVE E: A GREEN PLACE

There were thirteen representations received in respect of Plan Objective E (Chapter 3) of the draft Plan Strategy.

### Plan Objective E by Respondent Type



### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-078	RPS Consulting on behalf of Downshire Estate
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-098	Gravis Planning on behalf of Fraser Houses Ltd
DPS-100	Turley on behalf of Individual

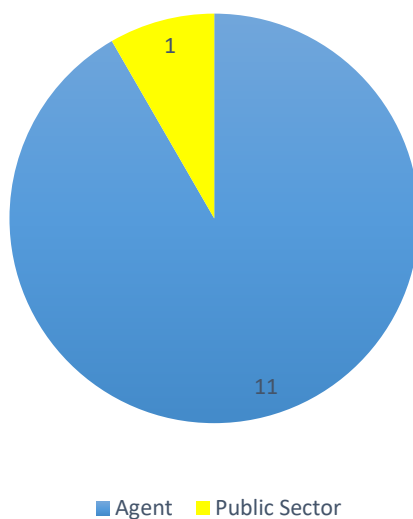
## Council Consideration of Issues Raised

<b>Main Issue(s) Raised</b>	<b>Council Consideration</b>
NIHE comment that they support the Plan Objectives, which are set out under six themes and aligned to the Community Plan themes and believe this will help provide synergy between the two Plans. Re Plan Objective E they support the objective to shape our places, the quality of new buildings and our town and village centres by promoting good design and maximise benefits to communities.	The Council welcomes the supportive comment.
NIEA welcomes the strategy to protect, conserve, enhance and restore natural heritage and landscape within the city council area. This strategy should ensure it takes account of adjoining council areas and any trans-boundary designations.	The Council notes the comments.
Nine representations (Gravis Planning on behalf of a number of clients) states that they were generally supportive of the Plan Objectives.	The Council welcomes the supportive comments.
RPS Consulting on behalf of the Downshire Estate comment that the omission of the subject lands (around Hillsborough Monument) is at odds with all 6 Plan Strategy Objectives.	The Council disagrees with this comment for the reasons outlined under Plan Objective A.
One representation (Turley) state they are in general support of the Plan Objectives.	The Council welcomes the supportive comment.

## PLAN OBJECTIVE F: A CONNECTED PLACE

There were twelve representations received in respect of Plan Objective F (Chapter 3) of the draft Plan Strategy.

### Plan Objective F by Respondent Type



#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-078	RPS Consulting on behalf of Downshire Estate
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-098	Gravis Planning on behalf of Fraser Houses Ltd
DPS-100	Turley on behalf of Individual

### Council Consideration of Issues Raised

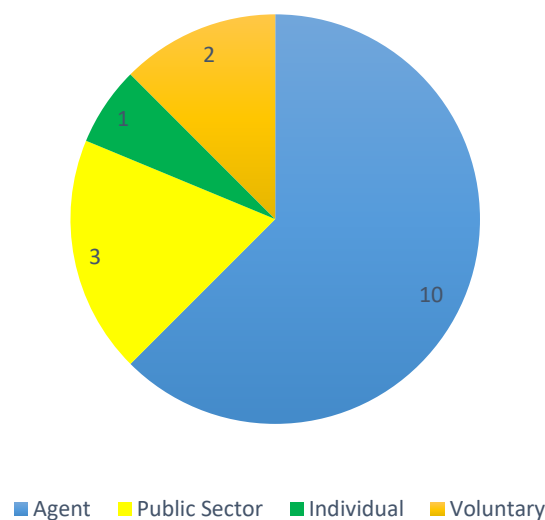
<b>Main Issue(s) Raised</b>	<b>Council Consideration</b>
NIHE commented that they support the Plan Objectives, which are set out under six themes and aligned to the Community Plan themes and believe this will help provide synergy between the two Plans. Re Plan Objective E they support the objective to shape our places, the quality of new buildings and our town and village centres by promoting good design and maximise benefits to communities.	The Council welcomes the supportive comment.
Nine representations (Gravis Planning on behalf of a number of clients) state that they are generally supportive of the Plan Objectives.	The Council welcomes the supportive comments.
RPS consulting of behalf of the Downshire Estate comment that the omission of the subject lands (around Hillsborough Monument) is at odds with all 6 Plan Strategy Objectives.	The Council disagrees with this comment for the reasons outlined under Plan Objective A.
One representation (Turley) state they are in general support of the Plan Objectives.	The Council welcomes the supportive comment.

## CHAPTER 4 STRATEGIC POLICIES AND SPATIAL STRATEGY

### Strategic Policy 01 Sustainable Development

There were sixteen representations received in respect of Strategic Policy 01 Sustainable Development.

### Strategic Policy 01 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-063	Individual
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-083	Agent
DPS-085	Agent
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-090	Dundonald Green Belt Association
DPS-092	Department for Economy (DfE)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)

## Council Consideration of Issues Raised

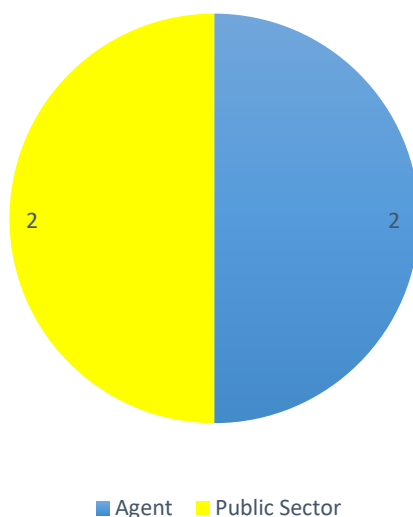
Main Issue(s) Raised	Council Consideration
<p>NIHE comment that they strongly support the statement that the LDP will facilitate sustainable development, including sustainable housing growth. NIHE supports an approach that proposals will be granted planning permission where they contribute to sustainable development. Therefore, would like to see proposals assessed with reference to the positive and negative effects they will have on economic, environmental and social factors.</p>	<p>The Council notes the comment. The purpose of Strategic Policy SP01 is to imbed Sustainable Development in all decision making.</p>
<p>NIEA comment that they welcomed this strategic policy which supports sustainable development including protecting and enhancing the natural environment.</p>	<p>The Council welcomes the supportive comment.</p>
<p>One representation (from individual) comments that they support Strategic Policy 01 sustainable development which recognises the importance of protecting and enhancing the historic and natural environment and protects its identity from excessive over-development</p>	<p>The Council welcomes the supportive comment.</p>
<p>Eight representations (Gravis Planning on behalf of a number of clients) comment that they support Strategic Policy 01 as sustainable development is imperative. The Council should seek to support the provision of jobs, services, and economic growth; and delivery of homes to meet the full range of housing needs integrated with sustainable infrastructure, whilst recognising the balance to be achieved in protecting environmental assets.</p>	<p>The Council welcomes the supportive comments.</p>
<p>Two representations (from Agent on behalf of clients) make comment that whilst SP01 refers to sustainable development the Council's plan will however locate all additional housing in the West Lisburn strategic site. The West Lisburn strategic site is not a sustainable location, being only accessible by car.</p>	<p>The Council disagrees with this comment. Firstly, new housing is not solely allocated to SMU01 West Lisburn/Blaris. The Plan has complied with the SPPS at paragraph 6.139 (The Processes for Allocating Housing Land, page 71) which states that the LDP should be informed by the RDS Housing Growth Indicators (HGIs); use of the RDS Housing Evaluation Framework; Allowance for existing housing commitments, and urban capacity studies; allowance for windfall, application of sequential approach; HNA/HMA, and Transport Assessments. The Council considers the West Lisburn/Blaris Strategic Mixed Use Site to be in a highly accessible and sustainable location, which benefits from the proposed new Knockmore Rail Halt along with strategic Park &amp; Ride (from BMTP), and Strategic Greenway identified through DfI's Strategic Greenway Plan.</p>

<p>Comments are made in both representations that the Strategic Policies were not spatially cross-cutting and undermine the ability of the plan to deliver sustainable development.</p>	<p>In relation to the cross-cutting nature of strategic policies, Strategic Policies 01-07 are a direct reflection of the SPPS objective of furthering sustainable development and core planning principles. The Council disagrees that the strategic policies of the dPS are not spatially cross-cutting, as all policies are to be read as a whole (See Strategic Policies and Spatial Strategy, paragraph 2 page 42).</p>
<p>Dundonald Green Belt Association comment indirectly to SP01 in that they state the plan is insufficiently supportive of RDS policies RG6, RG7, RG8, SFG2, which seek community cohesion, urban renaissance, promote more housing within existing urban areas, and to manage housing growth to achieve sustainable patterns of residential development.</p>	<p>The Council disagrees with this statement. The strategic policies outlined in Part 1 of the dPS (in particular, SP01, SP02, SP03, SP04, SP05, SP08, SP09, SP10, SP11, SP12, SP20) all assist the implementation of the RDS in support of communities, both urban and rural. The dPS actually references and endorses the referenced regional guidance in numerous places throughout the document.</p>
<p>DfE comment that they support the recognition given to digital infrastructure within Strategic Policies 01 (Sustainable Development) and 02 (Improving Health and Wellbeing) and that these are welcomed. The UK Government strategic framework to 2033 has been articulated in the 'Future Telecoms Infrastructure Review'.</p>	<p>The Council welcomes the supportive comment.</p>
<p>RSPB NI request that Policy SP01 be amended to replicate the precise wording of paragraph 5.72 of the SPPS in order to be more effective and comply with the SPPS and suggested the following wording: <i>'The council will be guided by the principle that sustainable development should be permitted, having regard to the local development plan and all other material considerations, unless the proposed development will cause demonstrable harm to interests of acknowledged importance. In such cases the Council has power to refuse planning permission'</i>. In addition the RSPB recommend the replication of paragraph 3.9 of the SPPS to be included in the J&amp;A <i>'In determining planning applications, the Council will also be guided by the precautionary approach that, where there are significant risks of damage to the environment, its protection will generally be paramount, unless there are imperative reasons of overriding public interest'</i>.</p>	<p>The Council considers the wording of Strategic Policy SP01 has taken account of the SPPS, without being a replication/duplication of it. The Council would emphasize that the provisions of the SPPS, including both paragraph 5.72 entitled 'Refusal of Planning Permission' and paragraph 3.9 referred to, remain in force as overarching strategic policy on publication of the Plan Strategy. The Council would point out that it deals with the definition of the precautionary principle in relation to SP19 Protecting and Enhancing Natural Heritage (see MC7A Minor Changes Schedule) as follows: <i>"The Council, when determining the impacts of a proposed development on international or national designations, will consider the precautionary principle as set out in the Rio Declaration on Environment and Development 1992 that states; Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as reasons for postponing cost effective measures to prevent environmental degradation."</i></p>

## Strategic Policy 02 Improving Health and Well-being

There were four representations received in respect of Strategic Policy 02 Improving Health and Well-being.

### Strategic Policy 02 by Respondent Type



#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-083	Agent
DPS-085	Agent
DPS-092	Department for Economy (DfE)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports this policy recognising the importance of considering health as part of the planning process, and that health impacts are considered in the formulation of development to assist better health and well-being for local people. In addition, we would like to see the inclusion of Health Impact Assessments for major development. Health Impact Assessments are often a requirement for planning applications in GB and can ensure health and well-being are considered, meeting this policy aim and the SPPS and Community Planning objective to improve health and well-being.	The Council notes the comment. This strategic policy supports proposals which contribute positively to general health and well-being and these are listed in the policy. Any requirement for a formal assessment to be submitted would require possible amendment to the DM regulations. The SPPS is silent on the submission of such an assessment.
Two representations (from Agent on behalf of clients) comment that the Strategic Policies are not spatially cross-cutting and undermine the	In relation to the cross-cutting nature of strategic policies, Strategic Policies 01-07 are a direct reflection of the SPPS objective of furthering sustainable development and core

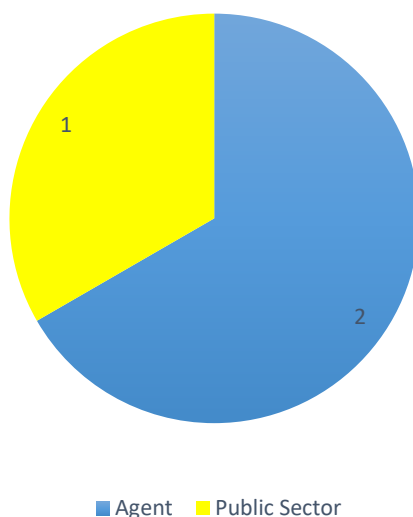


<p>ability of the plan to deliver sustainable development.</p>	<p>planning principles. The Council disagrees that the strategic policies of the dPS are not spatially cross-cutting, as all policies are to be read as a whole (see Strategic Policies and Spatial Strategy, paragraph 2 page 42).</p>
<p>DfE comment that the recognition given to digital infrastructure within Strategic Policies 01 (Sustainable Development) and 02 (Improving Health and Wellbeing) is welcomed.</p>	<p>The Council welcomes the supportive comment.</p>

### Strategic Policy 03 Creating and Enhancing Shared Space and Quality Places

There were three representations received in respect of Strategic Policy 03 Creating and Enhancing Shared Space and Quality Places.

#### Strategic Policy 03 by Respondent Type



#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-083	Agent
DPS-085	Agent

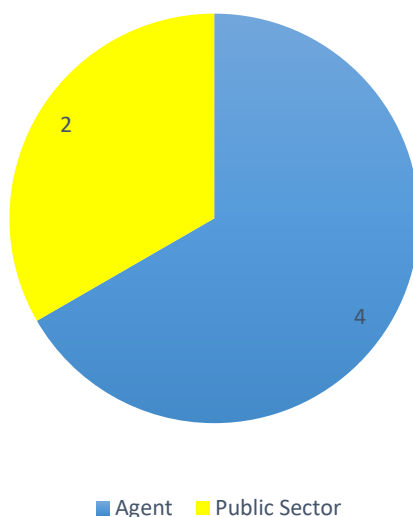
#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE comment that they strongly support this policy, which recognises housing of different house types, sizes and tenures to meet different needs, promotes balanced communities. NIHE believe a shared space policy can encourage community cohesion and the creation of sustainable communities, reducing the isolation of certain groups.	The Council welcomes the supportive comment.
Two representations (from Agent on behalf of clients) comment that the Strategic Policies are not spatially cross-cutting and undermine the ability of the plan to deliver sustainable development.	In relation to the cross-cutting nature of strategic policies, Strategic Policies 01-07 are a direct reflection of the SPPS objective of furthering sustainable development and core planning principles. The Council disagrees that the strategic policies of the dPS are not spatially cross-cutting, as all policies are to be read as a whole (see Strategic Policies and Spatial Strategy, paragraph 2 page 42).

## Strategic Policy 04 Supporting Sustainable Economic Growth

There were six representations received in respect of Strategic Policy 04 Supporting Sustainable Economic Growth.

### Strategic Policy 04 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-044	Turley on behalf of Lagmar Properties Ltd
DPS-062	TSA Planning on behalf of Unicorn Group
DPS-083	Agent
DPS-085	Agent
DPS-092	Department for the Economy (DfE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE support this policy to provide economic growth without compromising environmental standards. NIHE states; "We believe a strong economy is vital to support sustainable communities and well-being. We also note that the quality development and environmental protection can promote attractive places where people wish to live, work and invest in."	The Council welcomes the supportive comment.
Turley on behalf of Lagmar Properties Ltd query how the Council's Strategic Policy 04 - Supporting Sustainable Economic Growth can be achieved, if, in the main Council is proposing to recycle draft plan zonings which have not been fully assessed. A key aspect of the new	The Council disagrees with this comment in respect of existing draft plan zonings. The previous Development Plan (BMAP) was subject to a Public Local Inquiry and evidence exists to support the extant zonings having been through due process. In terms of whether

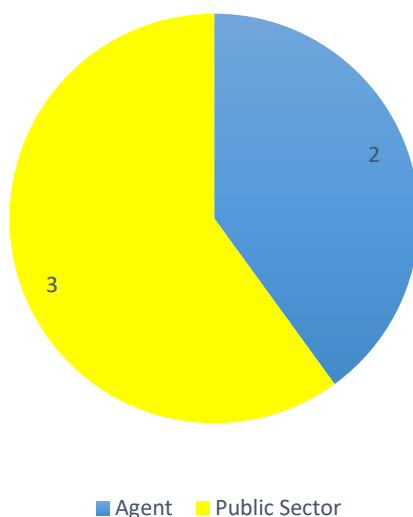
<p>Local Development Plan process requires Councils' to demonstrate that the proposed zonings are suitable, available and viable; this analysis has not been provided.</p>	<p>zonings are suitable, available and viable, the employment sites identified in the supporting Technical Supplement 3 Employment Land Review have been rigorously assessed, using criteria for access, site context, environment and market strength (see Chapter 7 Assessment of Employment Sites, pages 49-56 and Appendix 4 Site Assessments, pages 71 -112.) A further assessment of the remaining 10 sites has been undertaken by the Council and is contained in the Housing and Employment Topic Paper, January 2021. In terms of the Council's three identified Strategic Mixed Use Sites (SMU01, SMU02, SMU03) these were also designated through BMAP and further rigour has been applied to the redesignation of SMU01 West Lisburn/Blaris to account for the change to mixed use from solely employment use. Further detail is provided under Strategic Policy 11 Economic Development in Settlements and SMU01 West Lisburn/Blaris.</p>
<p>TSA Planning on behalf of the Unicorn Group comment that their client does not have any objections per se to any of the identified zonings, however they do not believe the approach taken (in respect of the Strategic Employment Allocation) is coherent with the Economic Objectives and Strategic Policy 4 of the DPS.</p>	<p>The Council notes the comment but disagrees that the approach for the Strategic Employment Allocation, as outlined under Strategic Policy 11 Economic Development in Settlements, is at odds with Strategic Policy 04 Supporting Sustainable Economic Development. Further detail is provided under Strategic Policy SP11 Economic Development in Settlements.</p>
<p>Two representations (from Agent on behalf of clients) comment that the Strategic Policies were not spatially cross-cutting and undermine the ability of the plan to deliver sustainable development.</p>	<p>In relation to the cross-cutting nature of strategic policies, Strategic Policies 01-07 are a direct reflection of the SPPS objective of furthering sustainable development and core planning principles. The Council disagrees that the strategic policies of the dPS are not spatially cross-cutting, as all policies are to be read as a whole (see Strategic Policies and Spatial Strategy, paragraph 2 page 42).</p>
<p>DfE comment that strategic energy system planning should feed into Strategic Policies 04 Supporting Sustainable Economic Growth, 05 Good Design and Positive Place-Making, 06 Protecting and Enhancing the Environment and, particularly 07 Section 76 Planning Agreements.</p>	<p>In relation to the cross-cutting nature of policies, the Council would confirm that all policies should be read as a whole, including the Strategic policies set out in Part 1 and Operational Policies contained in Part 2 of the dPS (see Strategic Policies and Spatial Strategy, paragraph 2 page 42). The Council does not underestimate the importance of this sector to the economy and society as a whole. The Council considers there is sufficient scope within the SPPS (paragraph 6.214-6.218) and its suite of policies to fully account for energy</p>

	provision in all its forms in order to meet the Government objectives outlined.
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## Strategic Policy 05 Good Design and Positive Place-Making

There were five representations received in respect of Strategic Policy 05 Good Design and Positive Place-Making.

### Strategic Policy 05 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-009	Department of Justice (DoJ)
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-083	Agent
DPS-085	Agent
DPS-092	Department for the Economy (DfE)

### Council Consideration of Issues Raised

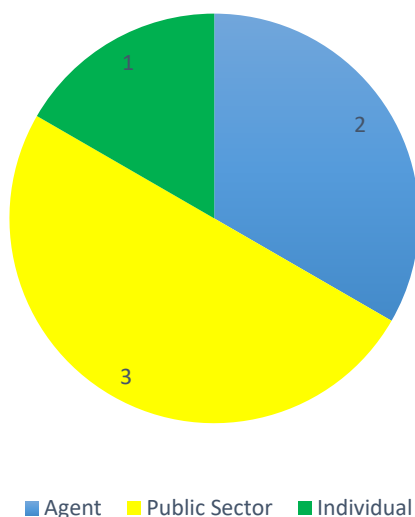
Main Issue(s) Raised	Council Consideration
DoJ comment that designing out crime should be embedded in the guidance and objectives in relation to other infrastructure projects, architecture and building environmental issues.	The Council proposes for clarity, as a minor change, to amend the J&A of Strategic Policy 05, page 44, final paragraph, end of second sentence as follows: <i>"...and its positive contribution to place-making including deterring crime and promoting personal safety."</i> (Ref: MC2 Minor Changes Schedule)
NIHE, in respect of SP05, supports a place making approach which links to urban design, ensuring that buildings are not looked at in isolation, but should be considered with regard to how they contribute to the overall function and appearance of an area.	The Council welcomes the supportive comment in relation to place making and the importance of good design.
NIHE objects to the lack of an accessible, adaptive and wheelchair standard requirement	The Council disagrees with the statement and considers that there is adequate policy

<p>for all residential developments. NIHE believe that "consideration" will not ensure sufficient delivery of housing to meet needs of all, as supported by the RDS and the SPPS.</p>	<p>provision for accessible, adaptive and wheelchair requirements for residential development, as these aspects are referred to specifically under Operational Policy HOU4 Design in New Residential Development. Please refer to Operational Policy HOU4 for further detail.</p>
<p>Two representations (from Agent on behalf of clients) comment that the Strategic Policies are not spatially cross-cutting and undermine the ability of the plan to deliver sustainable development.</p>	<p>In relation to the cross-cutting nature of strategic policies, Strategic Policies 01-07 are a direct reflection of the SPPS objective of furthering sustainable development and core planning principles. The Council disagrees that the strategic policies of the dPS are not spatially cross-cutting, as all policies are to be read as a whole (see Strategic Policies and Spatial Strategy, paragraph 2 page 42).</p>
<p>DfE comment that strategic energy system planning should feed into Strategic Policies 04 Supporting Sustainable Economic Growth, 05 Good Design and Positive Place-Making, 06 Protecting and Enhancing the Environment and, particularly 07 Section 76 Planning Agreements.</p>	<p>In relation to the cross-cutting nature of policies, the Council would confirm that all policies should be read as a whole, including the Strategic policies set out in Part 1 and Operational Policies contained in Part 2 of the dPS (see Strategic Policies and Spatial Strategy, paragraph 2 page 42). The Council does not underestimate the importance of this sector to the economy and society as a whole. The Council considers there is sufficient scope within the SPPS (paragraph 6.214-6.218) and its suite of policies to fully account for energy provision in all its forms in order to meet the Government objectives outlined.</p>

## Strategic Policy 06 Protecting and Enhancing the Environment

There were six representations received in respect of Strategic Policy 06 Protecting and Enhancing the Environment.

### Strategic Policy 06 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-063	Individual
DPS-083	Agent
DPS-085	Agent
DPS-092	Department for Economy (DfE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE welcome this policy to protect the natural environment. The natural environment is valuable to provide food, energy, flood control, clean water, clean air, aesthetics, and to support wildlife and biodiversity.	The Council welcomes the supportive comment.
NIEA state that they are encouraged by the Council's aim to respect the natural environment and biodiversity with support of the RDS key aim.	The Council welcomes the supportive comment.
One representation (from individual) strongly feels that the shore lines of Lough Neagh, particularly in the Feumore area, need to be conserved and enhanced. They recommend that settlement limits are not extended in Feumore.	The Council notes the comment. In relation to the site specific comment regarding the settlement development limits, the Council confirms that this is a matter for the Local Policies Plan, and not the Plan Strategy.

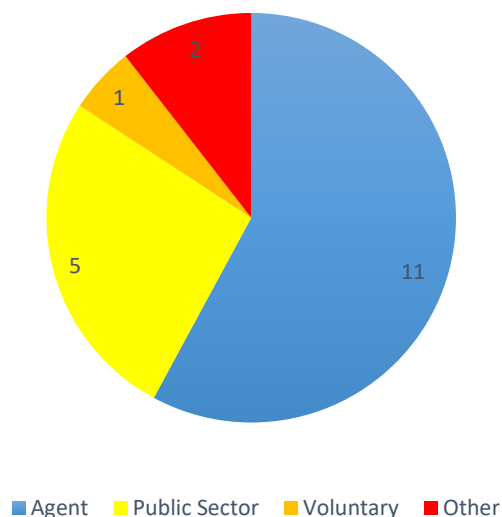


<p>Two representations (from Agent on behalf of clients) comment that the Strategic Policies are not spatially cross-cutting and undermine the ability of the plan to deliver sustainable development.</p>	<p>In relation to the cross-cutting nature of strategic policies, Strategic Policies 01-07 are a direct reflection of the SPPS objective of furthering sustainable development and core planning principles. The Council disagrees that the strategic policies of the dPS are not spatially cross-cutting, as all policies are to be read as a whole (see Strategic Policies and Spatial Strategy, paragraph 2 page 42).</p>
<p>DfE comment that strategic energy system planning should feed into Strategic Policies 04 Supporting Sustainable Economic Growth, 05 Good Design and Positive Place-Making, 06 Protecting and Enhancing the Environment and, particularly 07 Section 76 Planning Agreements.</p>	<p>In relation to the cross-cutting nature of policies, the Council would confirm that all policies should be read as a whole, including the Strategic Policies set out in Part 1 and Operational Policies contained in Part 2 of the dPS (see Strategic Policies and Spatial Strategy, paragraph 2 page 42). The Council does not underestimate the importance of this sector to the economy and society as a whole. The Council considers there is sufficient scope within the SPPS (paragraph 6.214-6.218) and the proposed suite of policies to fully account for energy provision in all its forms in order to meet the Government objectives outlined.</p>

## Strategic Policy 07 Section 76 Planning Agreements

There were nineteen representations received in respect of Strategic Policy 07 Section 76 Planning Agreements.

### Strategic Policy 07 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-006	Translink
DPS-007	Armagh City, Banbridge and Craigavon Borough Council
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-031	Co-Ownership
DPS-032	Turley on behalf of Northern Ireland Federation of Housing Associations (NIFHA)
DPS-048	Turley on behalf of Clanmil Housing Association
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-084	Ards and North Down Borough Council
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-090	Dundonald Green Belt Association
DPS-092	Department for the Economy (DfE)
DPS-105	WPB Ltd
DPS-111	Joanne Bunting MLA

## Council Consideration of Issues Raised

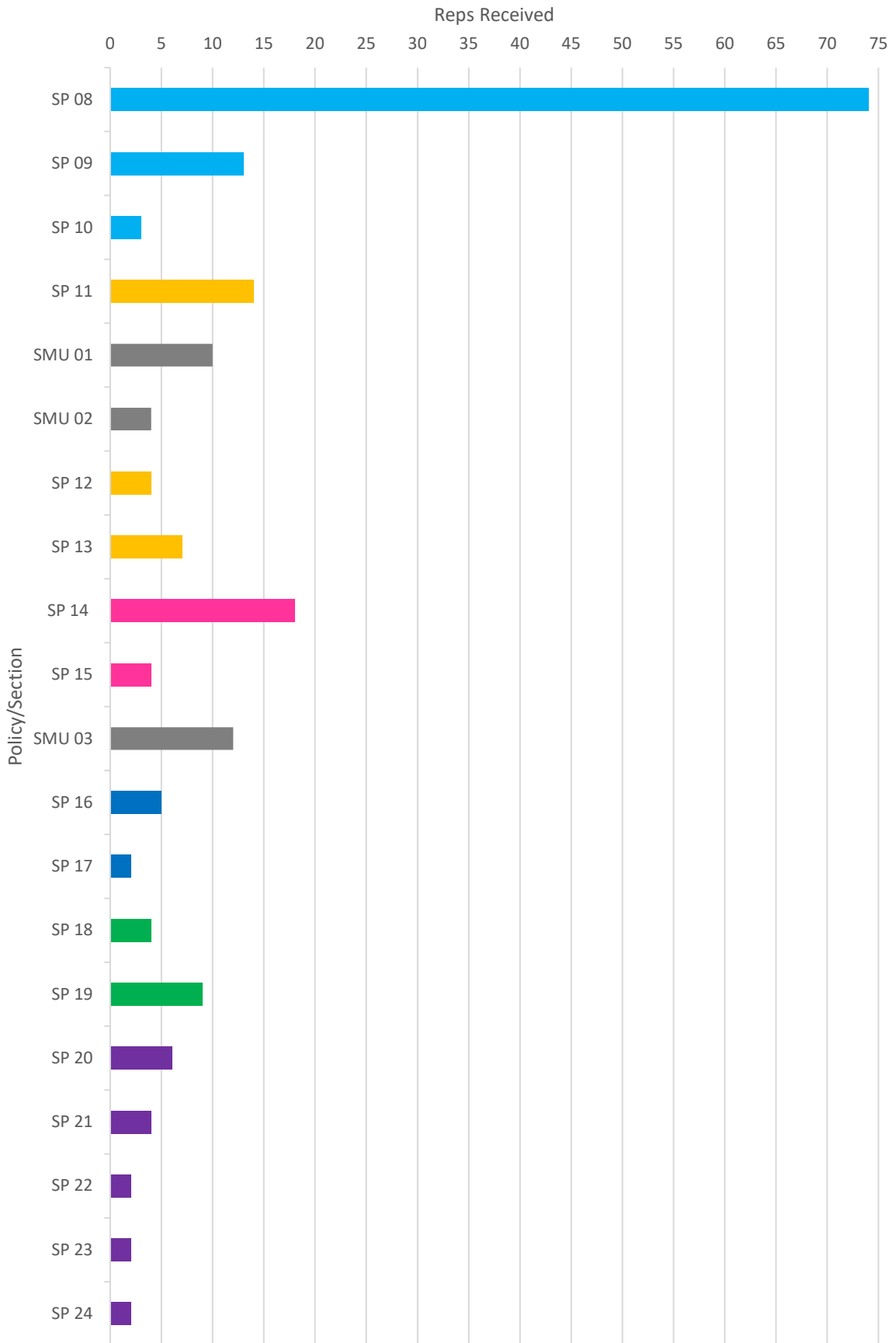
Main Issue(s) Raised	Council Consideration
<p>Translink state that developer contributions have a vital role to play in establishing public transport services in the early phases of developments and in encouraging behavioural change and modal shift. It is therefore crucial that the strategy enables developer contributions to be secured for not just infrastructure but also for public transport services.</p>	<p>The Council acknowledges this statement and consider that part a) of Strategic Policy SP07 adequately addresses the provision of public transport and its services. The Section 76 Framework document, which is currently being developed jointly by a number of Councils will seek to further provide clarity on this issue.</p>
<p>Armagh City, Banbridge and Craigavon Borough Council comment that they seek further clarity in relation to thresholds for the implementation of S76 Planning Agreements</p>	<p>Strategic Policy SP07 sets out the types of infrastructure which a developer would be expected to provide or contribute to through a S76 agreement. Rather than impose thresholds the policy is clear that a S76 agreement must be proportionate in terms of the scale and impact of the development and the sustainability of its location. The Council will negotiate S76 agreements on a site by site basis where mitigation is necessary to make the development acceptable. The Section 76 Framework document, which is currently being developed jointly by a number of councils will seek to further provide clarity on this issue.</p>
<p>NIHE comment that they welcome the policy in relation to Section 76 planning agreements. A planning agreement is an important element of place management, requiring the delivery of infrastructure to provide quality development, aiding a place-making approach. Planning agreements can also ensure the effective implementation of policy, including the Affordable Housing Policy.</p>	<p>The Council welcomes the supportive comment.</p>
<p>Co-ownership make several comments in relation to Planning agreements, namely: Planning agreements under section 76 of the Planning Act (NI) 2011 would provide a more suitable vehicle for the delivery of affordable housing as it is able to provide more detail in relation to the provision of affordable housing.</p> <p>It is important when section 76 agreements are introduced in Northern Ireland that lessons are learned from the operation of section 106 agreements in England and that there is a standard form of agreement (perhaps along the lines of the model section 106 agreement for use in England). This will encourage openness and transparency and encourage stakeholder buy-in to the process.</p>	<p>The Plan's Strategic Policy 07 Planning Agreements has been developed in accordance with section 76 of the Planning Act (NI) 2011 and is a policy expression of the legislation. The Council recognises the challenges concerning implementation of section 76 Planning Agreements in delivering necessary infrastructure including affordable housing to deliver more sustainable communities. The range of issues outlined by Co-Ownership regarding the delivery and implementation of section 76 Planning Agreements, including the timing, payment, sequencing of development, will require co-ordination across a range of stakeholders.</p>

<p>Given that there are a number of bodies involved in the negotiation of section 76 agreements representing different (and possibly competing) interests it is important that these issues are addressed and managed in a timely fashion. The Council needs to have sufficient resources to ensure that section 76 agreements are delivered. It needs to co-ordinate the role of statutory and other agencies in the process.</p> <p>Co-Ownership Housing looks forward to continuing to work with the Council in exploring and developing new and innovative schemes such as section 76 agreements to enhance the provision of affordable housing in the province.</p>	<p>The Council considers that the section 76 Framework document which is currently being developed conjointly by a number of Councils will seek to further provide clarity on this range of issues.</p>
<p>Turley on behalf of NIFHA (whilst not referring directly to Policy SP07) state that they have concerns about the implementation and delivery of Section 76 Planning Agreements namely:</p> <p>The recipient of the financial contribution (and therefore signatory to the agreement) must have the powers within their gift to spend the money on the provision of affordable housing; If a financial contribution is payable to the Council, they do not have it within their powers to deliver housing and therefore could not meet the terms of any obligation within the Section 76 Planning Agreement;</p> <p>If a financial contribution is payable to a Housing Association the Council should assure itself that the associations can receive such payments for the provision of social or intermediate housing. In the case of intermediate housing this would also require the association to be a willing signatory to a Planning Agreement for a site that they do not control.</p> <p>The Council should also clarify the intention of the financial contribution which would be sought and ensure that there is clarity regarding who can receive such payments. We would recommend that engagement on this matter is undertaken with the Department for Communities, NIHE and NIFHA to ensure that the policy can be implemented and does not fail soundness test CE3.</p>	<p>The range of issues outlined by NIFHA regarding the delivery and implementation of section 76 Planning Agreements, including the timing, payment, signatories to an agreement, will require co-ordination across a range of stakeholders.</p> <p>The Council considers that the Section 76 Framework document which is currently being developed conjointly by a number of Councils will seek to further provide clarity on this range of issues.</p>
<p>Turley on behalf of Clanmil Housing (whilst not referring directly to Policy SP07) quote the</p>	<p>The range of issues outlined by Clanmil Housing regarding the delivery and implementation of</p>

<p>same issues as those identified by NIFHA (see above) namely issues concerning the delivery and implementation of S76 Planning Agreements, and in particular the financial contributions.</p>	<p>S76 Planning Agreements, including the timing, payment, and signatories to an agreement, will require co-ordination across a range of stakeholders.</p> <p>The Council considers that the Section 76 Framework document which is currently being developed conjointly by a number of Councils will seek to further provide clarity on this range of issues.</p>
<p>Eight representations (Gravis Planning on behalf of a number of clients) comment that whilst this is a strategic policy, it is too broad and does not set out robust evidence or methods for how the planning agreements will be used. Furthermore, appropriate guidance should be published on when a planning obligation should be used setting out the appropriate tests.</p> <p>They disagree specifically to the inclusion of affordable housing within the policy, stating that Section 76 agreements are unduly onerous and time consuming to put in place and therefore increases the timelines involved in the delivery of affordable housing. A planning condition is a more appropriate and efficient means of securing the delivery of affordable housing on sites.</p> <p>They state that Strategic Policy 7 (SP7) is not sound as it is not reasonably flexible to enable it to deal with changing circumstances and it is not based on a robust evidence base (Test CE2). A remedy is suggested to revise SP7 to remove affordable housing and include policy tests for when planning obligations should be used. Supplementary Planning Guidance should also be published so that financial contributions can be suitably quantified if necessary.</p>	<p>The Plan's Strategic Policy SP07 Planning Agreements has been developed in accordance with Section 76 of the Planning Act (NI) 2011 and is a policy expression of the relevant legislation.</p> <p>The Council recognises the challenges concerning implementation of S76 Planning Agreements in delivering necessary infrastructure including affordable housing to deliver more sustainable communities. The range of issues outlined regarding the delivery and implementation of S76 Planning Agreements, will require co-ordination across a range of stakeholders.</p> <p>The Council considers that the Section 76 Framework document, which is currently being developed conjointly by a number of Councils will seek to further provide clarity on this range of issues.</p>
<p>Ards and North Down Borough Council note that the Council intends to explore a collaborative Framework for Developer Contributions in conjunction with other Councils and welcome the opportunity to engage in that process.</p>	<p>The Council notes the comment and welcomes engagement in the development of a collaborative Section 76 Framework Document.</p>
<p>Dundonald Green Belt Association state that the use of Section 76 Planning Agreements (page 45) should be expanded to include delivering social housing.</p>	<p>The Council would confirm that use of S76 agreements are to secure aspects of development proposals that cannot be attained by use of operational policy or conditions. The use of S76 agreements would be considered on</p>

	<p>a case by case basis, but Strategic Policy 07 at point b) allows for the delivery of affordable housing under S76 Planning Agreements. Likewise the J&amp;A to HOU10 indicates use of such agreements are an option open to the Council for delivery of affordable housing.</p>
<p>DfE comment that Strategic Policy 07 provides a list of positive contributions developers could make, but it does not include the contribution they could make to the transition to a low carbon future. The Council may wish to consider in terms of energy efficiency and the deployment of low carbon energy systems. These could be dealt with under planning conditions applied to individual developments but it may be appropriate to include them here in a strategic context.</p>	<p>The Council notes the comment and considers, in relation to energy efficiency and deployment of low carbon energy systems, that these are sufficiently dealt with under the suite of operational policy in Part 2 (see HOU4 and RE2) and legislatively controlled through building regulations.</p>
<p>WPB Ltd comment that in accordance with draft Strategic Policy 07 the use of Section 76 planning agreements would be coordinated with potential developers. There is currently no evidence to suggest that such agreements have been secured in the two settlements mentioned (Glenavy and Maghaberry).</p>	<p>The Council acknowledges that the delivery and implementation of Section 76 Planning Agreements is between the Council and developer(s). The Council has no comment to make in respect of the latter point, as this is site specific and it is not clear what planning applications the representation is referring to.</p>
<p>Joanne Bunting, MLA, comments in relation to the Dundonald area that further development would only be exasperated if planning does not have effective policy to bolster enforcement of conditions and Section 76 agreements.</p>	<p>The Council acknowledges the comment and confirms that whilst the draft Plan Strategy does not provide additional enforcement powers, a full suite of enforcement powers are contained in the Planning Act (Northern Ireland) 2015 and carried out by the Council's Enforcement Unit. In relation to Section 76 Planning Agreements, the purpose of SP07 is to strengthen the use of Planning Agreements in accordance with the existing legislative provisions.</p>

# Part 1 - Strategic Policies 08-24

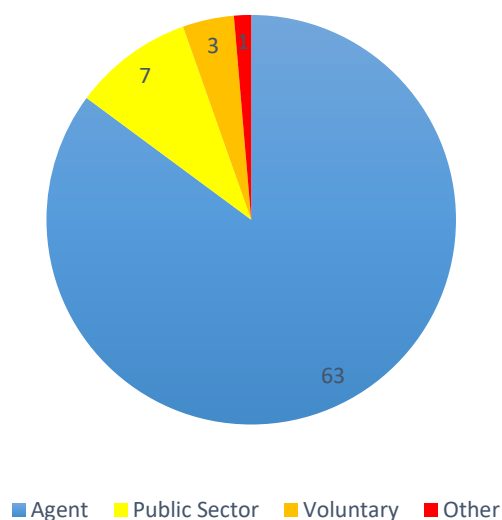


## A: A QUALITY PLACE

### Strategic Policy 08 Housing in Settlements (Includes Strategic Housing Allocation)

There were seventy-four representations received in respect of Strategic Policy 08 Housing in Settlements.

### Strategic Policy 08 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-017	Les Ross Planning
DPS-023	Matrix on behalf of individual
DPS-025	Quarry Plan on behalf of individual
DPS-026	Matrix on behalf of individual
DPS-028	Matrix on behalf of individual
DPS-031	Co-Ownership
DPS-032	Turley on behalf of Northern Ireland Federation of Housing Associations (NIFHA)
DPS-033	Clyde Shanks on behalf of Neptune Carleton
DPS-034	Inaltus Limited on behalf of Lisburn North Development Consortium
DPS-035	Inaltus Limited on behalf of Porter Homes
DPS-039	Inaltus Limited on behalf of O’Kane Properties
DPS-041	Belfast City Council (BCC)
DPS-046	NI Water
DPS-047	Matrix on behalf of individual
DPS-048	Turley on behalf of Clanmil Housing Association
DPS-049	Donaldson Planning
DPS-050	Donaldson Planning
DPS-051	Donaldson Planning



DPS-052	Donaldson Planning
DPS-053	Donaldson Planning
DPS-054	Donaldson Planning
DPS-055	Donaldson Planning
DPS-060	DEARA (NIEA Natural Environment Division)
DPS-065	Clyde Shanks on behalf of individual
DPS-067	TSA Planning on behalf of Fraser Houses (NI) Ltd
DPS-068	TSA Planning on behalf of Rosemount Homes (Carryduff)Ltd
DPS-069	TSA Planning on behalf of Lotus Homes (UK) Ltd
DPS-070	TSA Planning on behalf of Cherrytree Holdings Ltd
DPS-071	TSA Planning on behalf of Individual
DPS-072	Turley on behalf of Johncorp (No.1) Ltd
DPS-073	Gravis Planning on behalf of MRP Investment and Development Ltd.
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes.
DPS-077	Gravis Planning on behalf of Conway Estates
DPS-078	RPS Consulting on behalf of Downshire Estate
DPS-079	TSA on behalf of Cherrytree Holdings Ltd
DPS-080	Fleming Mounstephen Planning on behalf of individual
DPS-083	Agent
DPS-084	Ards and North Down Borough Council
DPS-085	Agent
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-090	Dundonald Green Belt Association
DPS-091	Clyde Shanks on behalf of Farrans Construction
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-095	Turley on behalf of Plantation Landowner Group
DPS-097	Clyde Shanks on behalf of Individual
DPS-099	Carryduff Regeneration Forum
DPS-100	Turley on behalf of Individual
DPS-101	Turley on behalf of JH Price & Sons
DPS-102	Turley on behalf of Lagan Homes Ltd
DPS-103	Turley on behalf of Viewpoint Developments Ltd
DPS-104	Turley on behalf of Chambers Homes Ltd
DPS-105	WPB on behalf of GHL
DPS-106	Turley on behalf of Individual
DPS-107	Turley
DPS-108	Turley on behalf of Glengard Farms
DPS-109	Department for Infrastructure (Dfi)
DPS-110	Clyde Shanks
DPS-114	McCready Architects on behalf of Individual

DPS-115	McCready Architects on behalf of Individual
DPS-116	McCready Architects on behalf of Individual
DPS-117	McCready Architects on behalf of Individual
DPS-118	McCready Architects on behalf of Individual
DPS-119	McCready Architects on behalf of Individual
DPS-120	McCready Architects on behalf of Individual
DPS-121	McCready Architects on behalf of Individual
DPS-122	One2One Planning on behalf of Individual
DPS-123	McCready Architects on behalf of Individual
DPS-124	One2One Planning on behalf of Individual

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>Armagh City, Banbridge and Craigavon Borough Council comment that the Housing allocation does not appear to allow for Urban Capacity sites or Windfall potential; and windfall in Table three is only projected over a 12 year period.</p>	<p>Table 3, page 64 of the dPS 'Strategic Housing Allocation' (and its amendment, see FC1B) indicates the amount of housing potential which may be delivered through all sources of housing supply including Urban Capacity and Windfall sites) and the Council aims to be fully transparent in this regard.</p> <p>The 12 year allowance for windfall discounts the first three years of the draft Plan Strategy period to ensure no double counting occurs, as the original 2017 baseline figures (identified in Column 2, Table 3) may have included sites that would fall under the windfall category, i.e. sites with planning permission outside zonings.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>
<p>NIHE strongly supports SP08, in particular the need to "promote balanced local communities with a mixture of house types of different size and tenure including affordable and specialised housing". They also welcome references to mixed tenure housing.</p> <p>NIHE would like to see a definition of affordable housing in the policy and within the glossary to provide certainty.</p>	<p>The Council welcomes the supportive comments.</p> <p>The Council proposes for clarity, as a minor change, to include the definition of affordable housing within the J&amp;A of Strategic Policy SP08, page 57 and also place this in the glossary for Part 1 of the DPS, page 160, as follows:  <i>"For the purpose of this Plan Strategy, the current definition of affordable housing accords with the SPPS definition provided in its glossary (page 114)."</i></p>

<p>NIHE questions the Housing Needs Assessment of 6,240 affordable units required over the plan period. NIHE identifies the social requirement is 3,062 and the intermediate requirement is 1,920 with a total of 4,982 over the plan period.</p> <p>NIHE supports the strategic housing allocation which is generally aligned with the RDS. They also support a sequential approach, based on the settlement hierarchy and the Housing Needs Assessment, has been taken into account thereby ensuring that sufficient land is identified to meet the affordable housing need.</p>	<p>(Ref: MC3A Minor Changes Schedule)</p> <p>The Council has considered the figures for affordable housing need and acknowledges that an error has occurred. The Council proposes for clarity, as a focussed change, to amend the figure (based on the 2018 Housing Investment Plan Update) as follows:  <u>Page 28</u>: “Extrapolating this figure over the Plan period from 2017-2032 equates to an estimated figure of approximately 2,400 <i>social housing dwelling</i> units. An additional need is also indicated for intermediate housing which equates to an additional projected need for <del>3,840</del> 1,920 units over the Plan period.”  <u>Page 61</u>: “The total affordable housing requirement for the Plan period is <del>6,240</del> 4,320 units of which 2,400 are social housing units.”  (Ref: FC1A Focussed Changes Schedule)</p> <p>The Council welcomes the supportive comments.</p>
<p>Les Ross Planning quotes the Council’s comment on page 61 of the dPS under Point 7, paragraph 2 which states “Table 3 negates the need to provide any greenfield extensions”. They comment as follows: this is incoherent as it predetermines the second stage of the Plan process; the inclusion of the West Lisburn/Blaris lands is unsustainable as there is no guarantee the scheme will be started or completed within the Plan period; it assumes a monopoly position; and other alternative sites for expansion have not been considered.</p> <p>The following amendment is suggested: the DPS should not specify Blaris as the exclusive location for future expansion.</p>	<p>Table 3, page 64 of the dPS ‘Strategic Housing Allocation’ (and its amendment, see FC1B), makes no provision for greenfield extensions because, as demonstrated, the amount of housing required over the Plan period (independently verified in Housing Growth Study, Technical Supplement 1) can be accommodated within the settlement development limits as currently defined. The West Lisburn/Blaris lands are within the current settlement development limits (SDL) and Strategic Policy SMU01 allows for its redesignation for mixed use including residential. Alternative sites which would lie outside the settlement development limits would not represent a sustainable option as this constitutes greenfield expansion contrary to regional policy direction. Such sites, should they be submitted, would require consideration on the basis of soundness at the Local Policies Plan stage.</p> <p>The Council does not agree with the modification proposed. As stated above the land designated at West Lisburn/Blaris presents</p>

	<p>the most sustainable location being already located within Lisburn City SDL. Further detail on the Council's rationale is provided under Strategic Policy SMU01 West Lisburn/Blaris.</p>
<p>Matrix on behalf of a number of individuals comment as follows: There is insufficient land zoned for housing within existing settlement limits to accommodate the level of growth.</p> <p>The villages make up 12% or 13,546 of the total population and small settlements 3%. The potential remaining indicates 1,231 in Villages and Small Settlements therefore there is under provision and additional lands need to be zoned for residential use in villages and small settlements.</p> <p>The above point is expanded upon in relation to the Castlereagh Greater Urban area, which is 27% of the total population.</p> <p>This is again highlighted in relation to Towns which is 14% of the total population.</p>	<p>The Council is content that the outworking of Table 3, page 64 of the dPS, 'Strategic Housing Allocation' (and its amendment, see FC1B) has been developed in accordance with the SPPS Processes for Allocating Housing Land (page 71) and RDS Housing Evaluation Framework (HEF, page 42) approach outlined, with the main allocation of housing growth being directed to the urban settlements, in particular encouraging the growth of Lisburn City (further enabled through the allocation of a strategic mixed use site at West Lisburn/Blaris); and the remainder of the urban area including the three main towns of Carryduff; Hillsborough &amp; Culcavy; and Moira. A lower level of growth is allocated to the rural settlements proportionate to their role and function in supporting the needs of a vibrant rural community. The SPPS indicates the RDS housing evaluation framework as one of eight indicators, and therefore a balanced judgement has been applied in relation to the growth strategy. The other 7 indicators all play an equal role informing the Council's consideration in assessing the allocation of housing growth across the Council area.</p> <p>Whilst the Countryside is not included in the settlement hierarchy, without a countryside percentage, Table 1 (page 49, dPS) is potentially unclear in terms of the existing balance of population growth. The Council proposes for clarity, as a minor change, to amend Table 1 of the dPS, page 49, to include, for completeness, the countryside percentage (19%) as follows: <i>Amended Table 1 to include a percentage for the population residing in the countryside (Ref: MC3B Minor Changes Schedule)</i></p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>
<p>Quarry Plan on behalf of an individual comment as follows:</p>	<p>Table 3, page 64 of the dPS, 'Strategic Housing Allocation' (and its amendment, see FC1B) indicates there is sufficient housing provision</p>

<p>The housing at Blaris will not be delivered until late in the plan period. This will fail to deliver the required amount of housing during the plan period.</p> <p>As much of the residential land already has permission granted and the type and tenure of housing is fixed, there is little flexibility over the plan period.</p> <p>There is no provision for shorter to medium housing provision. Policy approach should be amended to reflect this requirement.</p>	<p>across the Council area. It is acknowledged that the West Lisburn/Blaris lands will contribute to the provision in the longer term over the Plan period. However, given that the significant number of potential units remaining (as indicated in Column 2) are extant approvals across the settlement hierarchy, there is little impacting delivery on the ground in both the short or medium term. Table 3 indicates, in accordance with the SPPS (paragraph 6.139, Processes for allocation of housing land) that the HGI is not a target, and the overall percentage of supply increases with brownfield development (UCS and Windfall sites). The Council is therefore satisfied there is sufficient and sustainable land available for residential use over the Plan period which is both realistic and deliverable.</p> <p>The Council acknowledges that the remaining potential largely relates to legacy planning applications. However, on adoption of the Plan Strategy, any new scheme will need to be policy compliant. Market forces, including a growing number of smaller families, will likely result in amended proposals being submitted to address this situation.</p> <p>The Council is content with the approach taken and no modification of the policy as suggested is proposed.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>
<p>Co-Ownership want to ensure that the definition of intermediate housing may change over time as new intermediate housing products may be developed.</p> <p>Welcome SP08 and associated operational policies which will add to the delivery of affordable housing in the Council area.</p>	<p>The Council proposes for clarity, as a minor change, to include the definition of affordable housing within the J&amp;A of Strategic Policy SP08, page 57 and also place this in the glossary for Part 1 of the DPS, page 160, as follows:  <i>“For the purpose of this Plan Strategy, the current definition of affordable housing accords with the SPPS definition provided in its glossary (page 114) ”</i>  (Ref: MC3A Minor Changes Schedule)</p> <p>The Council welcomes this comment.</p>

<p>Note the review currently underway by the Department for Communities and the possible new definition of affordable housing.</p>	<p>The Council is aware of the current consultation process and awaits further advice from DfC in conjunction with DfI in terms of how this would impact on the SPPS definition of affordable housing.</p>
<p>Turley on behalf of NIFHA and Clanmil Housing comment on the following:  The Council has failed to provide sufficient evidence or clarification on the affordable housing need for the plan period.  In Technical Supplement 1, the Council states a need for 2,490 affordable homes derived from NIHE market analysis (HMA 2018) however it is not provided within the supporting paper.</p> <p>Conflict in figures quoted for affordable housing in the Technical Supplement compared to DPS and recommend the Council provide clarity around the figures.</p> <p>The Council has failed to demonstrate how the affordable housing can be provided within sites with remaining capacity.</p>	<p>The Council receives its Housing Needs Assessment (HNA) as part of the NIHE Housing Investment Plan publication. The HNA is also included in the Housing Executive’s Commissioning Prospectus. In addition NIHE published a Housing Market Analysis (HMA) Update which provides evidence in order to develop integrated housing policies and approaches. The Council has provided this update as one of its submission documents and it is also available from the Housing Executive on request.</p> <p>The Council has considered the figures for affordable housing need and acknowledges that an error has occurred. The Council proposes for clarity, as a focussed change, to amend the figure (based on the 2018 Housing Investment Plan Update) as follows:  <u>Page 28</u>: “Extrapolating this figure over the Plan period from 2017-2032 equates to an estimated figure of approximately 2,400 <i>social housing dwelling</i> units. An additional need is also indicated for intermediate housing which equates to an additional projected need for <del>3,840</del> <i>1,920</i> units over the Plan period.”  <u>Page 61</u>: “The total affordable housing requirement for the Plan period is <del>6,240</del> <i>4,320</i> units of which 2,400 are social housing units.”  (Ref: FC1A Focussed Changes Schedule)</p> <p>The Council’s operational policy HOU10 introduces a new mixed tenure approach to delivery of affordable housing over the Plan period. Table 3, page 64 of the dPS ‘Strategic Housing Allocation’ (and its amendment, see FC1B) indicates the range of brownfield sites available through UCS and Windfall sites, which when included exceeds the existing HGI. It is considered that this will be key to delivering affordable housing over the Plan period. Extant permissions may be amended by developers over the Plan period, and the policy would then also deliver on this front. In accordance with paragraph 6.143 of the SPPS, should a proposed zoning or Key Site Requirements (KSRs) be</p>

<p>The following amendment is suggested: Identify additional lands by expansion of settlement limits.</p>	<p>necessary, this will be considered as part of the Local Policies Plan (LPP).</p> <p>The Council is content with the approach taken and no modification of the policy as suggested is proposed.</p>
<p>Clyde Shanks on behalf of Neptune Carleton welcome the identification of 1,350 residential units at Blaris.</p>	<p>The Council notes these comments.</p>
<p>Inaltus on behalf of Lisburn North Development Consortium; Porter Homes; and O’Kane Properties comment as follows: This specific policy is unsound for a number of reasons:</p> <ul style="list-style-type: none"> <li>• Failure to consider advice from Chief Planner in relation to updated HGI</li> <li>• The Housing requirement calculation is not robust and policies do not logically flow from the strategy.</li> <li>• No robust evidence base for housing allocation but rather determined by remaining housing land.</li> <li>• The strategy does not reflect housing potential in that a number of towns are under provided for in the housing requirements.</li> </ul> <p>Suggest the following amendments:</p> <ul style="list-style-type: none"> <li>• Provide a robust objective assessment of housing requirement</li> <li>• Provide a housing allocation that supports main urban areas and allows them to grow.</li> </ul> <p>The representation includes further detail on the above points at Appendix A and concludes that the housing methodology is inadequate and lists 8 factors that have not been fully considered.</p>	<p>The Council makes the following comments in relation to the key points raised:</p> <p>At the time of writing both the dPS and Housing Growth Study, the revised 2016 based HGI paper had not been published (figures were released on 25<sup>th</sup> September 2019) and therefore was unable to be used. The Consultants appointed to undertake the Housing Growth Study have addressed this point.</p> <p>The Council proposes for clarity, as a focussed change, to amend Table 3 of the draft Plan Strategy (dPS), page 64, and relating text on pages 58-63 under the Strategic Housing Allocation, to reflect the most up-to-date HGI data provided at time of publication of the draft Plan Strategy.</p> <p>A minor adjustment (equivalent to 3% of the HGI figure) was made to reflect the mid-point between the two employment-led scenarios that were included in the Housing Growth Study (as updated).</p> <p>An Addendum to Technical Supplement 1 Housing Growth Study has also been provided to reflect the HGI update.</p> <p><i>See Annex 1 for amended Table 3 (page 64) and relating text (pages 58-63, Part 1) and Addendum to Technical Supplement 1. (Ref: FC1B Focussed Changes Schedule)</i></p> <p>The Council is content that the outworking of Table 3, page 64 of the dPS, ‘Strategic Housing Allocation’ (and its amendment, see FC1B) has been robustly assessed and developed in accordance with the SPPS Processes for Allocating Housing Land (page 71) and the RDS Housing Evaluation Framework (HEF, page 42), with the main allocation of housing growth being directed to the urban settlements, in particular encouraging the growth of Lisburn</p>

	<p>City (further enabled through the allocation of a strategic mixed use site at West Lisburn/Blaris); and the remainder of the urban area including the three main towns of Carryduff; Hillsborough &amp; Culcavy; and Moira. A lower level of growth is allocated to the rural settlements, proportionate to their role and function in supporting the needs of a vibrant rural community. The SPPS indicates the RDS housing evaluation framework as one of 8 indicators, and therefore a balanced judgement has been applied in relation to the growth strategy. The other 7 indicators all play an equal role informing the Council's consideration in assessing the allocation of housing growth across the Council area.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>
<p>Belfast City Council comment as follows: The Strategic Housing Allocation has a 10% over supply buffer. BCC notes that the proposed housing growth seeks to continue these existing, unsustainable trends, despite recognition that past growth has been based on commuting into Belfast.</p> <p>Only 40% of new housing will be delivered inside the existing urban footprint. Contrary to the RDS target of 60%.</p>	<p>The Council disagrees with the suggestion that past growth has been solely predicated on commuting to Belfast. A variety of factors such as quality of life, variety of jobs and housing, access to education and open space all provide unique appeal to the Council location. The Council's Housing Growth Strategy is based on the SPPS strategic guidance for the allocation of housing land. The Housing Growth Study (Technical Supplement 1) takes account of the HGI figure but goes further by assessing the wider implications of the housing market area, housing market dynamics, demographics, jobs related growth, and affordable housing need to provide an indication of the projected housing need over the Plan period using all available data. The Council is content that the approach and methodology applied is both realistic and deliverable.</p> <p>The dPS, page 60 provides an explanation for this shortfall. BMAP had already zoned a significant number of sites for housing which were in effect extensions to the urban footprint of many settlements. The urban footprint used for the dPS was the 2012 baseline (to align with the HGI publication) and as such these zoned areas fell outside the calculation for brownfield.</p>



	<p>However as these are developed, they will become part of the urban footprint.</p>
<p>NI Water confirm the population projection increase of 12% by 2032 and comment that housing need is well documented in Technical Supplement 1 and welcomes the granularity of housing allocation across the Council area.</p>	<p>The Council welcomes the supportive comments.</p>
<p>Donaldson Planning on behalf of seven representations comment as follows: There is failure to deliver appropriate growth across the settlement hierarchy; failure to deliver on the RDS objectives of SFG13.</p> <p>Strategic policies should look ahead over a minimum 15 year period from adoption (NPPF in England); a plan which allocates only enough land to equate to the HGI figure will be unsound; fails to comply with DPPN01 as plan period is unrealistically short.</p>	<p>The Council is satisfied, in preparing this Plan Strategy, that it has taken the regional guidance contained in the RDS including the Housing Evaluation Framework into consideration. In particular Regional Guidance RG6, 7 and 8. The focus is on achieving sustainable patterns of residential development through promoting more housing within existing urban areas and promoting a more compact urban form. The Council has demonstrated in Table 3, page 64 of the dPS 'Strategic Housing Allocation' (and its amendment, see FC1B) that the projected housing need over the Plan period can be largely accommodated within the existing Settlement Development Limits and this fully meets the objectives of Regional Guidance. In relation to SFG13 of the RDS, the Council is content that its strategic housing allocation has been developed in accordance with the SPPS Processes for Allocating Housing Land (page 71) and RDS Housing Evaluation Framework (HEF, page 42). A lower level of growth is allocated to the rural settlements proportionate to their role and function in supporting the needs of a vibrant rural community.</p> <p>Table 1 (page 49, dPS) has been amended to take account of the percentage of population in the Countryside.</p> <p>Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p> <p>The Planning Act (NI) 2011 does not set out a prescribed period of time that the Plan should cover. Paragraph 2.6 of Development Plan Practice Note (DfI) 01 states the LDP should fulfil the following functions: <i>"Provide a 15 year plan framework to support the economic and social needs of the council's district....."</i></p> <p>The Council has aligned the time period of its Plan Strategy with that of its Community Plan</p>

<p>Methodology: The Plan should account for an additional 5 years; from the Council figures an additional 5 years x 700 completions per year equates to 3,500 units; added to the HGI 11,500 and the real figure should be 15,000 units over a 20 year period; this allows greater flexibility, deliverability and choice.</p> <p>Housing allocation: This is incoherent and unrealistic; fails to provide direction for strategic growth; no effort to address existing imbalances in the distribution, location or type of available housing land; deliverability; the 10% requires an evidential base.</p>	<p>2017-32, as the spatial representation of the Community Plan.</p> <p>Unlike the NPPF in England, the SPPS only requires (paragraph 5.7) that the LDP must set out a long term spatial strategy. Better monitoring, together with regular reviews of LDPs, will provide more flexibility and enable the Council to adapt to changing circumstances. A Plan can be reviewed after adoption of the Local Policies Plan, should a particular need arise. The Plan period is therefore fully in accordance with regional policy and guidance. The Housing Growth Study (Technical Supplement 1) takes account of the HGI figure but goes further by assessing the wider implications of the housing market area, housing market dynamics, demographics, jobs related growth, and affordable housing need to provide an indication of the projected housing need over the Plan period using all available data. The Council is content that the approach and methodology applied is both realistic and deliverable.</p> <p>In accordance with paragraph 5.26 of the SPPS the statutory requirement to monitor the LDP on an annual and five yearly basis will ensure that the LDP is kept up to date and reflects and responds to this emerging issue. Paragraph 6.140 states that a 'plan, monitor and manage' approach is necessary to ensure that, as a minimum, a 5 year supply of land for housing is maintained. Monitoring should be an ongoing process with annual reporting and review.</p> <p>The Council disagrees with this statement for the reasons outlined above. Table 3, page 64 of the dPS 'Strategic Housing Allocation (and its amendment, see FC1B) provides the evidence for the housing allocation which is primarily focused on existing settlements within the hierarchy. More housing is allocated within the urban settlements (City and Towns) in line with RG8 of the RDS and SPPS (paragraph 6.139 Processes for Allocating Housing Land). BMAP already zoned a significant number of sites for housing which were (in effect) extensions to the urban footprint of many settlements. The percentages shown across Table 3 (and its amendment) exceed the HGI allocation and have been reduced by 10% to account for non-</p>
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<p>Affordable Housing: No evidence that there are sufficient uncommitted zonings to facilitate the level of need.</p>	<p>delivery during the plan period which is a generally agreed principle based on best practice in the other jurisdictions.</p> <p>The Council’s operational Policy HOU10 introduces a new mixed tenure approach to delivery of affordable housing over the Plan period. Table 3 (and its amendment) indicates the range of brownfield sites available through UCS and Windfall sites, over the existing HGI and it is considered that this will be key to delivering affordable housing over the Plan period. Extant permissions may be amended by developers over the Plan period, and the policy would also deliver on this front. In accordance with paragraph 6.143 of the SPPS, should a zoning or Key Site Requirements (KSRs) be necessary, this will be considered as part of the Local Policies Plan (LPP).</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021</p>
<p>NIEA state that the Water Framework Directive (WFD) objectives for water-bodies in the plan area are not currently being met. The LDP should strive to play a role in improving water quality within the plan area. Any new or further development land/housing sites should acknowledge the need for adequate wastewater treatment infrastructure and treatment capacity.</p>	<p>Following consultation with DfI Water and Drainage Policy Division, the Council encourages the use of SuDS for new housing development (Policy HOU4) and has requested further guidance from the Department on how future development plan zonings can incorporate SuDS and how these would be implemented, managed and maintained, given that the Council is advised by NI Water that currently only 'hard' SuDS solutions will be adopted.</p> <p>Following consultation with NI Water, the Council is fully cognisant of two main issues raised, the first being the capacity of WwTW themselves (through annual updates from NI Water using ‘traffic light’ indicators for WwTWs as part of the LDP consultation process – see Appendix H); and the second being capacity of the network itself. The NI Water website contains information on modelling that is underway and the Council consults extensively with NI Water through the planning application process. Operational Policy WM2 Treatment of Waste Water (page 107, Part 2 dPS) deals with this issue and highlights that discharge consent</p>

	is to be obtained from DAERA to connect to the existing network.
<p>Clyde Shanks on behalf of an individual comment as follows: The grouping of villages and small settlements in same section of Table 3 is unsound as they are at differing levels in the settlement hierarchy.</p> <p>For villages and small settlements it is unclear where there may be potential shortfall or oversupply of available housing lands; difficult to decipher where there could be potential areas of growth.</p>	<p>The Council notes the comment, however disagrees that this makes Table 3, page 64 of the dPS, 'Strategic Housing Allocation' (and its amendment, see FC1B) unsound by grouping the lower tier rural settlements. The differentiation in the urban settlements (City, Greater Urban Area and Towns) are notably a focus of the RDS Regional Guidance RG8 in that paragraph 3.16 states <i>"The emphasis is on managing housing growth to ensure that there continues to be a focus on developing more high quality accessible housing within existing urban areas"</i>. It is not considered critical or essential to separate the villages from the small settlements.</p> <p>At the time of writing the Housing Growth Study (using a 2017 baseline) Table 6 of Technical Supplement 1 provides the total potential units remaining in the villages and small settlements combined, a figure of 1,368 units. Table 11 of Technical Supplement 1 gives the potential housing remaining in each of the 13 villages, a figure of 1,044 units. Small Settlements are not individually broken down however units remaining equates to 324 units. Up-to-date figures on the potential units remaining in individual settlements are provided in the Council's Annual Housing Monitor Report, 2018-19, which is available on the Council's website.</p> <p>Relating to this representation, in Technical Supplement 1, Housing Growth Study, the following data is provided. Table 5 shows the population breakdown across the settlement hierarchy. Whilst the Countryside is not included in the settlement hierarchy, without a countryside percentage, Table 1 (page 49, dPS) is potentially unclear in terms of the existing balance of population growth. The Council proposes for clarity, as a minor change, to amend Table 1 of the dPS, page 49, to include for completeness, the countryside percentage (19%) as follows: <i>Amended Table 1 to include a percentage for the population residing in the countryside (Ref: MC3B Minor Changes Schedule)</i></p>

	Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021
<p>TSA Planning on behalf of Fraser Houses (NI) Ltd comment that sites which are identified on the Council’s housing monitor should be considered as ‘Committed’ housing zonings and make up part of the Strategic Housing Allocation for the plan period.</p>	<p>The Council can confirm that all zoned housing sites are identified by the housing monitor with an associated figure indicating the potential units remaining. Many of the housing areas previously unzoned in the ‘draft’ version of BMAP, were consequently zoned in the ‘final’ version of BMAP as a result of recommendations included in the PAC public inquiry report. BMAP was subsequently quashed and remains unadopted. However such zonings identified in the ‘final’ version of BMAP have been retained by the housing monitor owing to the PAC public inquiry recommendations remaining a significant material consideration. The potential deliverable figures include such zonings and the rationale for their inclusion is considered sound.</p>
<p>TSA Planning on behalf of Rosemount Homes (Carryduff) Ltd; Lotus Homes (UK) Ltd; Cherrytree Holdings Ltd; and an individual comment as follows:</p> <p>Strategic Housing Allocation figure: The Council did not take account of the RDS. The RDS identifies at RG8 that the HGI figures should not be seen as a rigid framework but guidelines for local planning.</p> <p>The Council’s Strategic Housing Allocation is currently too stringent as it focuses on past population trends and will result in an inadequate provision of housing lands over the plan period.</p> <p>The Strategic Allocation figure is currently too restrictive and as such inappropriate; the figure does not afford flexibility in respect of changing social or economic circumstances and their possible impact upon housing demand and delivery.</p> <p>They suggest increasing the Strategic Housing allocation figure to 12,260; use guidance of RG8 and recently published HGI figures to determine the level of housing growth and also local evidence such as build rates.</p>	<p>The Council makes the following comment in relation to the key points raised:</p> <p>The Council is content that the outworking of Table 3, page 64 of the dPS, ‘Strategic Housing Allocation’ (and its amendment, see FC1B) has been developed in accordance with the SPPS Processes for Allocating Housing Land (page 71) and RDS Housing Evaluation Framework (HEF, page 42) approach outlined, with the main allocation of housing growth being directed to the urban settlements, in particular encouraging the growth of Lisburn City (further enabled through the allocation of a strategic mixed use site at West Lisburn/Blaris); and the remainder of the urban area including the three main towns of Carryduff; Hillsborough &amp; Culcavy; and Moira. A lower level of growth is allocated to the rural settlements proportionate to their role and function in supporting the needs of a vibrant rural community. The SPPS indicates the RDS housing evaluation framework as one of 8 indicators, and therefore a balanced judgement has been applied in relation to the growth strategy. The other 7 indicators all play an equal role informing the Council’s consideration</p>

<p>The uplifted allocation provides appropriate flexibility in respect of social/economic circumstances as well as the 10% increase to allow for non-delivery of sites.</p> <p>Allocation to settlements: No assessment or judgement in the strategic growth of individual settlements or the most sustainable locations for housing.</p> <p>The council's strategic allocation is not managed as per paragraph 6.135 of the SPPS particularly outside of Lisburn City. The allocation for settlements is not based on the evidence provided. There is no coherent strategy for zoning of lands at local policies plan stage.</p> <p>Housing monitor 2016-2017 is inaccurate and as such allocations are unrealistic.</p> <p>Allocation is not flexible between settlements.</p> <p>The following amendments are suggested: Manage growth in line with the growth strategy and evidence provided this can then be compared to the existing commitments.</p> <p>Review existing commitments and urban capacity sites to ensure accurate allocations between settlements.</p> <p>Remove reference to there being sufficient housing land supply.</p> <p>Provide strategic policy for the zoning and management of housing lands within settlements.</p>	<p>in assessing the allocation of housing growth across the Council area. Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p> <p>The Council disagrees that the SHA is restrictive as a focus of the RDS Regional Guidance RG8, paragraph 3.16 states <i>"The emphasis is on managing housing growth to ensure that there continues to be a focus on developing more <u>high quality accessible housing within existing urban areas</u>."</i></p> <p>Table 3 (and its amendment) indicates, in accordance with the SPPS (paragraph 6.139, Processes for allocation of housing land) that the HGI is not a target, and the overall percentage of supply increases with the inclusion of brownfield development (UCS and Windfall sites) to exceed the HGI figure. The Council is therefore satisfied there is sufficient and sustainable land available for residential use over the Plan period and are confident that this is both realistic and deliverable.</p> <p>At the time of writing the Housing Growth Study, the revised 2016 based HGI paper had not been published (figures were released on 25<sup>th</sup> September 2019) and therefore was unable to be used. The Consultants appointed to undertake the Housing Growth Study have addressed this point.</p> <p>The Council proposes for clarity, as a focussed change, to amend Table 3 of the (dPS), page 64, and relating text on pages 58-63 under the Strategic Housing Allocation, to reflect the most up-to-date HGI data provided at time of publication of the draft Plan Strategy. A minor adjustment (equivalent to 3% of the HGI figure) was made to reflect the mid-point between the two employment-led scenarios that were included in the Housing Growth Study (as updated). An Addendum to Technical Supplement 1 Housing Growth Study has also been provided to reflect the HGI update. <i>See Annex 1 for amended Table 3 (page 64) and relating text (pages 58-63, Part 1) and Addendum to Technical Supplement 1.</i></p>
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	<p>(Ref: FC1B Focussed Changes Schedule)</p> <p>Housing Monitor data used to inform Table 3 (and its amendment) reflected in Column 2, is based on the most up to date evidence in the form of Housing Completion Certificates supplied by the Council’s Building Control unit. It is accepted that there will always be a degree of lag in the figures from when the site is first recorded as a monitored site through the issuing of a planning approval and the issuing of a building control completion notice. This is unavoidable and not considered significant as the figures are updated on a yearly basis using these two pieces of data and are as accurate as possible at time of publishing.</p>
<p>Turley on behalf of Johncorp (No.1) Ltd welcome the identification of lands previously unzoned for residential use to be retained as zoned as a result of the PAC enquiry.</p>	<p>The Council can confirm that all zoned housing sites are identified by the housing monitor with an associated figure indicating the potential units remaining. The lands previously unzoned in the ‘draft’ version of BMAP, were consequently zoned in the ‘final’ version of BMAP as a result of recommendation included in the PAC public inquiry report. BMAP was subsequently quashed and remains unadopted. However such zonings identified in the ‘final’ version of BMAP have been retained by the housing monitor owing to the PAC public inquiry recommendations remaining a significant material consideration. The potential deliverable figures therefore include these zonings, and the rationale for their inclusion is considered sound.</p>
<p>Gravis Planning on behalf of MRP Investment and Development Ltd; Killultagh; an individual; Hillmark Homes; Conway Estates and three representations from Fraser Houses Ltd comment as follows:</p> <p>Disagree with the Strategic Housing Allocation figures in Table 3.</p>	<p>The Council in accordance with the SPPS, considered the HGI 2012-based household projections, which identify a housing need between 2012-2025 (i.e. 13 years) of 9,600 units, or 738 dpa; following the release of 2016-based household projections, the Council’s Consultants carried out a review based on the original methodology used, between 2017-2032 (i.e. 15 years) this resulted in 10,380 units, 692 dpa which was rounded up to 700 dpa. Figures used in Table 3 of the dPS for the Strategic Housing Allocation (and its amendment, see FC1B) are based on the most up-to-date evidence available at the time of publication. The comment on page 62 regarding housing delivery completions since 2005/6 up to the 2017 Housing Monitor baseline is based on a 12</p>

<p>The Council projections are based on too short a review period; the period should have been 1998 – 2013; suggest this gives an annual build rate of 796 dwellings; multiplying 796 by 20, i.e. the plan period plus an additional 5 year supply, equates to 15,920 units; 10% needs added to account for a potential non- delivery over the plan period and the potential needs of adjacent councils.</p>	<p>year period, as opposed to the five year period suggested.</p> <p>At the time of writing the Housing Growth Study, the revised 2016 based HGI paper had not been published (figures were released on 25<sup>th</sup> September 2019) and therefore was unable to be used. The Consultants appointed to undertake the Housing Growth Study have addressed this point.</p> <p>The Council proposes for clarity, as a focussed change, to amend Table 3 of the (dPS), page 64, and relating text on pages 58-63 under the Strategic Housing Allocation, to reflect the most up-to-date HGI data provided at time of publication of the draft Plan Strategy. A minor adjustment (equivalent to 3% of the HGI figure) was made to reflect the mid-point between the two employment-led scenarios that were included in the Housing Growth Study (as updated).</p> <p>An Addendum to Technical Supplement 1 Housing Growth Study has also been provided to reflect the HGI update.</p> <p><i>See Annex 1 for amended Table 3 (page 64) and relating text (pages 58-63, Part 1) and Addendum to Technical Supplement 1. (Ref: FC1B Focussed Changes Schedule)</i></p> <p>The inclusion of an additional five year supply beyond the Plan period is also not evidentially based. In accordance with paragraph 5.26 of the SPPS the statutory requirement to monitor the LDP on an annual and five yearly basis will ensure that the LDP is kept up to date and reflects and responds to emerging issues. Paragraph 6.140 states that a ‘plan, monitor and manage’ approach is necessary to ensure that, as a minimum, a 5 year supply of land for housing is maintained. Monitoring should be an ongoing process with annual reporting and review. Table 3 (and its amendment) indicates if all potential is realized, that this exceeds the HGI figure and provides an element of flexibility beyond the Plan period to 2032. The monitoring of the Plan and review (post Local Policies Plan) will identify if potential housing units are being delivered or if more is required.</p>
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<p>An additional 2,400 units are required at West Lisburn not 1,350 as stated in Table 3.</p> <p>An additional 2,400 social housing units are required as no guaranteed method of delivery.</p> <p>The resultant housing allocation equates to a figure of 22,312 units being required; SP08 is not sound as is not flexible to deal with changing circumstances and not based on robust evidence; the projected housing growth has been underestimated.</p> <p>They question the Housing Monitor Data which they suggest provides an incorrect baseline on which to base the remaining growth potential.</p>	<p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021.</p> <p>The 1,350 dwellings allocated at West Lisburn/Blaris is calculated on the density and size of the developable area for housing - not the figures quoted by the West Lisburn Development Framework (WLDF) which is a non-statutory document.</p> <p>In relation to affordable housing, it is considered unsound to simply add 2,400 units to the total. This would result in zoning land for social housing purposes which is at odds with both regional direction and the Council's approach of making such provision mixed tenure through a policy led approach. Operational policy (HOU 10) aims to integrate this type of housing provision resulting in more balanced integrated communities. In accordance with paragraph 6.143 of the SPPS, should a zoning or Key Site Requirements (KSRs) be necessary, this will be considered as part of the Local Policies Plan (LPP).</p> <p>The suggested projected figure of 22,312 as shown in the Table presented in this representation, is considered unsound and is not evidentially based. Furthermore it is considered unsustainable in that it would require large amounts of greenfield land with associated infrastructure to deliver the suggested housing potential. It is therefore considered contrary to regional guidance and policy as contained in the RDS and SPPS.</p> <p>Housing Monitor data used to inform Table 3 (and its amendment) reflected in Column 2, is based on the most up to date evidence in the form of Housing Completion Certificates supplied by the Council's Building Control unit. It is accepted that there will always be a degree of lag in the figures from when the site is first recorded as a monitored site through the issuing of a planning approval and the issuing of a building control completion notice. This is unavoidable and not considered significant as the figures are updated on a yearly basis using these two pieces of data and as accurate as possible at time of publishing.</p>
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<p>The following amendment is suggested: Revise the housing growth figure to provided 22,312 new homes within the district by 2032.</p>	<p>Up-to-date figures on the potential units remaining in individual settlements are provided in the Council’s Annual Housing Monitor Report, 2018-19, which is available on the Council’s website.</p> <p>The Council does not agree with revision of the housing figures to those suggested. Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>
<p>RPS Consulting on behalf of Downshire Estate states that the dPS seeks to rely only on existing zoned and committed sites to deliver the housing need for the borough generally and Hillsborough. They state there is an over-reliance on existing zonings and commitments.</p>	<p>This representation does not formally refer to Strategic Policy SP08 however the implied reference to Table 3 and other statements are of relevance.</p> <p>The Council is satisfied that the projected housing requirements can be largely met by permissions already granted and the remaining potential on zoned housing land (Column 2 of Table 3). Table 3 (and its amendment) also includes other potential sources of housing delivery notably from brownfield sites, i.e. UCS and Windfall, in addition to a strategic housing supply at West Lisburn/Blaris. The Council has concluded from the evidence it has collated that no greenfield extensions are required to deliver the projected housing need over the Plan period. This position can be reviewed following adoption of the Local Policies Plan should a need be identified.</p>
<p>Fleming Mounstephen Planning on behalf of an individual comment as follows: SP08 states it will support proposals that are in accordance with the Strategic Housing Allocation; this is an extension of Plan Objective A(5) which states ‘provide appropriate opportunities for housing in settlements...’; however when reviewed there is unlikely to be any new housing allocations across the 13 villages and 33 small settlements; this is neither coherent or appropriate.</p>	<p>The Council is content that the outworking of Table 3 of the dPS, Strategic Housing Allocation (and its amendment, see FC1B) has been developed in accordance with the SPPS Processes for Allocating Housing Land (page 71) and RDS Housing Evaluation Framework (HEF, page 42) approach outlined, with the main allocation of housing growth being directed to the urban settlements, in particular encouraging the growth of Lisburn City (further enabled through the allocation of a strategic mixed use site at West Lisburn/Blaris); and the remainder of the urban area including the three main towns of Carryduff; Hillsborough &amp; Culcavy; and Moira. A lower level of growth allocated to the rural settlements (villages and small settlements) proportionate to their role and function in supporting the needs of a vibrant rural community. The SPPS indicates</p>

	<p>the RDS housing evaluation framework as one of 8 indicators, and therefore a balanced judgement has been applied in relation to the growth strategy. The other 7 indicators all play an equal role informing the Council's consideration in assessing the allocation of housing growth across the Council area.</p> <p>Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p> <p>The Council is content that there is sufficient remaining potential in both villages and small settlements, as indicated in amended Table 3, page 64, dPS.</p>
<p>An Agent on behalf of two representations comment as follows: No account is taken of updated HGIs published by Dfl.</p> <p>The period of consideration was, on dwelling completions from 2006, the worst period for property based investment; this is not considered representative or reflective of the actual capacity/demand/need; growth rate not based upon historical analysis of build rate or any form of market analysis of the number of dwellings actually completed; paragraphs 4.6-</p>	<p>At the time of writing the Housing Growth Study, the revised 2016 based HGI paper had not been published (figures were released on 25<sup>th</sup> September 2019) and therefore was unable to be used. The Consultants appointed to undertake the Housing Growth Study have addressed this point and an update is provided.</p> <p>The Council proposes for clarity, as a focussed change, to amend Table 3 of the (dPS), page 64, and relating text on pages 58-63 under the Strategic Housing Allocation, to reflect the most up-to-date HGI data provided at time of publication of the draft Plan Strategy. A minor adjustment (equivalent to 3% of the HGI figure) was made to reflect the mid-point between the two employment-led scenarios that were included in the Housing Growth Study (as updated).</p> <p>An Addendum to Technical Supplement 1 Housing Growth Study has also been provided to reflect the HGI update.</p> <p><i>See Annex 1 for amended Table 3 (page 64) and relating text (pages 58-63, Part 1) and Addendum to Technical Supplement 1. (Ref: FC1B Focussed Changes Schedule)</i></p> <p>As indicated in Figure 4.3 of the Housing Growth Study (Technical Supplement 1), the Plan is sound by having assessed a full range of conditions, i.e. pre-recession (2007/08) and post-recession, which accounts for a wider range of impacts on the housing market. The Council is content that the time period used depicts an accurate portrayal of trends in the</p>

<p>4.13 give detailed analysis of build out rates; disagree with findings of Housing Growth Study.</p> <p>The following amendments are suggested: An allowance for the SPPS requirement for a continuous five year supply at the end of the plan period; allowance for the growth plans of neighbouring councils; allowance for West Lisburn; allowance for affordable housing; the base line should be 15,920 units over the plan period; Buffer of 10% needs to be added to ensure any shortfall is covered. Figure rises to 17,512; Social Housing Requirement: not factored in and figure rises to 19,912; West Lisburn will deliver more than 1,500 units. In summary the housing growth figure should be 22,312 units.</p> <p>Urban capacity study and windfall: Paragraphs 4.28-4.29 of the UCS states the approach to the 16 sites identified in Lisburn City Centre is critically flawed and results in double counting. This results in a shortfall of 583 units over the plan period and must be found elsewhere. Windfall sites run out over the plan period they are not an infinite resource.</p> <p>Issue with provision of housing in villages; there is no village policy and there is uneven</p>	<p>housing market. If the last 5 years for example, had been used from 2012, the average completions would have provided a much lower estimate of growth.</p> <p>The inclusion of an additional five year supply beyond the Plan period is also not evidentially based. In accordance with paragraph 5.26 of the SPPS the statutory requirement to monitor the LDP on an annual and five yearly basis will ensure that the LDP is kept up to date reflecting and responding to emerging issues. Paragraph 6.140 of the SPPS states that a ‘plan, monitor and manage’ approach is necessary to ensure that, as a minimum, a 5 year supply of land for housing is maintained. Monitoring should be an ongoing process with annual reporting and review.</p> <p>Table 3 and its amendment, indicates that if all potential is realised then this exceeds the HGI figure and provides an element of flexibility beyond the Plan period 2032. The monitoring of the Plan and review (post Local Policies Plan) will identify if the potential housing units have been delivered or if additional units are required.</p> <p>The UCS (Technical Supplement 2) identifies a range of suitable sites for housing/employment within the urban footprint. Type 1 sites are Housing Monitor sites and Type 2 are “new sites” of which 41 sites in total were retained following assessment, 29 of these were inside the Urban Footprint, and 12 of these are outside the Urban Footprint. Having assessed the sites referred to within Lisburn City Centre, the Council is content that no double counting has occurred. Windfall, whilst not definitive, is recognised in the SPPS as a key source of housing supply. Both figures have been reduced by 10% to allow for any shortfall in deliverability. Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p> <p>The Council is content that the outworking of Table 3 of the dPS, ‘Strategic Housing</p>
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<p>allocation reflective of the population of a village and the remaining potential.</p>	<p>Allocation', (and its amendment, see FC1B) has been developed in accordance with the SPPS Processes for Allocating Housing Land (page 71) and RDS Housing Evaluation Framework (HEF, page 42) approach. The main allocation of housing growth being directed to the urban settlements, in particular encouraging the growth of Lisburn City (further enabled through the allocation of a strategic mixed use site at West Lisburn/Blaris); and the remainder of the urban area including the three main towns of Carryduff; Hillsborough &amp; Culcavy; and Moira. A lower level of growth is allocated to the rural settlements (villages and small settlements) proportionate to their role and function in supporting the needs of a vibrant rural community. The SPPS indicates the RDS housing evaluation framework as one of 8 indicators, and therefore a balanced judgement has been applied in relation to the growth strategy. The other 7 indicators all play an equal role informing the Council's consideration in assessing the allocation of housing growth across the Council area.</p> <p>Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p>
<p>Ards and North Down Borough Council comment that there is confusion on figures on page 59 and Table 3.</p> <p>Query why urban capacity and windfall sites have also been subject to 10% reduction as monitoring would identify any areas of concern and sites not coming forward.</p> <p>Most up to date HGI figures not used and what figure was the 10% buffer applied too.</p>	<p>The Council notes the comment made, and can confirm that the figures do correlate but can clarify that the figures for existing housing commitments indicated on page 59 of the dPS are reduced by 10% in Table 3 on page 64 of the dPS to account for an element of non-deliverability.</p> <p>As referred to above, a 10% discount was applied to all sources of housing supply indicated in Table 3 in order to account for an element of non-delivery over the Plan period. This is a generally agreed principle based on best practice in the other jurisdictions. It is accepted that the housing monitor will provide accurate data in relation to housing completions and a full review will be carried out following adoption of the Local Policies Plan.</p> <p>Further detail on the 10% discount is provided in the Housing and Employment Topic Paper, January 2021.</p>

	<p>At the time of writing the Housing Growth Study, the revised 2016 based HGI paper had not been published (figures were released on 25<sup>th</sup> September 2019) and therefore was unable to be used. The Consultants appointed to undertake the Housing Growth Study have addressed this point and an update is provided. The Council proposes for clarity, as a focussed change, to amend Table 3 of the (dPS), page 64, and relating text on pages 58-63 under the Strategic Housing Allocation, to reflect the most up-to-date HGI data provided at time of publication of the draft Plan Strategy. A minor adjustment (equivalent to 3% of the HGI figure) was made to reflect the mid-point between the two employment-led scenarios that were included in the Housing Growth Study (as updated). An Addendum to Technical Supplement 1 Housing Growth Study has also been provided to reflect the HGI update. <i>See Annex 1 for amended Table 3 (page 64) and relating text (pages 58-63, Part 1) and Addendum to Technical Supplement 1. (Ref: FC1B Focussed Changes Schedule).</i></p> <p>Paragraph 4.9 of the Housing Growth Study (Technical Supplement 1) refers to the 10% over-supply, taking into consideration the possibility that an element of the identified potential might not come forward during the Plan period.</p> <p>Further detail and update is provided in Housing and Employment Topic Paper, January 2021.</p>
<p>Dundonald Greenbelt Association comment as follows: The policy is insufficiently supportive of RDS policies RG6, 7 and 8.</p> <p>Plan does not encourage compact town and village form.</p>	<p>Strategic Policy SP08 is not specifically referred to but comments contained in the representation are deemed to be of relevance. The Council has taken full regard of the regional guidance outlined in RG6-8 of the RDS 2035; these are specifically referenced on page 55 of the dPS. SP08 is framed in light of regional guidance in the RDS and regional strategic policy of the SPPS.</p> <p>The Council disagrees with this comment. SP08 (d) recognises the importance of supporting development proposals that encourage compact urban forms, which is further</p>

<p>No phasing of lands; greenfield sites should be in phase two in line with the SPPS.</p> <p>Over-zoning of land is contrary to best practice. De-zoning should be an option.</p> <p>Baseline figure of 10,380 needs clarified.</p>	<p>explained in the J&amp;A. There are also no designations proposed beyond the current settlement development limits, again encouraging compact form.</p> <p>There is no rationale for the phasing of lands at dPS stage. Table 3 page 64 of the dPS (and its amendment) identifies all potential development is within the existing settlement development limits including the Strategic Mixed Use Site at West Lisburn/Blaris, SMU01. Further detail is contained within the Housing and Employment Topic Paper, January 2021.</p> <p>The Council considers the dPS has not over-zoned in relation to potential housing provision and while the HGI is not a target the projected figures are calculated as a percentage of the HGI to provide clarity and ensure no excessive over-provision occurs. As a result no de-zoning is considered appropriate or necessary.</p> <p>The Council commissioned a Housing Growth Study which examined the robustness of the RDS Housing Growth Indicators (HGI). The study looked at updating the 2012 based HGI through the use of 2016-based household projections and adjustments set out within the 2012 HGI methodology. It identified a new baseline future growth of 10,380 households over the Plan period (692 dwellings per annum). This was rounded up to 700 dwellings per annum equating to 10,500 dwellings for the plan period (see paragraph 4.8 Technical Supplement 1 'Overview of SHA and Allocation'; Table 6.2 and paragraph 6.8 Housing Growth Study).</p> <p>At the time of writing the Housing Growth Study, the revised 2016 based HGI paper had not been published (figures were released on 25<sup>th</sup> September 2019) and therefore was unable to be used. The Consultants appointed to undertake the Housing Growth Study have addressed this point and an update is provided.</p> <p>The Council proposes for clarity, as a focussed change, to amend Table 3 of the (dPS), page 64, and relating text on pages 58-63 under the Strategic Housing Allocation, to reflect the most</p>
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<p>Query the 10% discount on trend based figures.</p>	<p>up-to-date HGI data provided at time of publication of the draft Plan Strategy. A minor adjustment (equivalent to 3% of the HGI figure) was made to reflect the mid-point between the two employment led scenarios that were included in the Housing Growth Study (as updated). An Addendum to Technical Supplement 1 Housing Growth Study has also been provided to reflect the HGI update. <i>See Annex 1 for amended Table 3 (page 64) and relating text (pages 58-63, Part 1) and Addendum to Technical Supplement 1. (Ref: FC1B Focussed Changes Schedule)</i></p> <p>As referred to previously, a 10% discount is applied to all sources of housing supply indicated in Table 3 page 64 of the dPS in order to account for an element of non-delivery over the Plan period. This is a generally agreed principle based on best practice in the other jurisdictions.</p> <p>Further detail on the 10% discount is provided in the Housing and Employment Topic Paper, January 2021.</p>
<p>Clyde Shanks on behalf of Farrans Construction; an individual; and themselves comment as follows: The Plan period is not long enough and will result in under supply of housing land at the end of the plan period.</p> <p>The period (2008-2015) on which the projection is based is flawed. This covers the worst recession in the house building sector. This has not been taken into consideration. Figures for the housing completions have not been properly considered by the Council or Lichfields.</p>	<p>The time period for the Plan is set out in Departmental Guidance which, in accordance with Soundness Test C3, the Council must take account of. Development Plan Practice Note 01 states (at paragraph 2.6) that the LDP should provide a 15-year plan framework to support the economic and social needs of a council's district in line with regional strategies and policies, while providing for the delivery of sustainable development; additionally, DPPN 7 Plan Strategy (paragraph 2.8) states that the Plan Strategy should be the spatial reflection of the Council's Community Plan. The Council has aligned the time period of its Plan Strategy with that of its Community Plan 2017-2032.</p> <p>The Council in accordance with the SPPS, considered the HGI 2012 based household projections, which identify a housing need between 2012-2025 (i.e. 13 years) of 9600 units, or 738 dpa; following the release of 2016 based household projections, the Council's Consultants carried out a review based on the original methodology used, between 2017-2032 (i.e. 15 years) resulting in 10,380 units, or 692</p>



<p>Suggest alternative method of calculating proposed housing supply; 10% uplift in figures not a reduction as council proposes.</p>	<p>dpa which was rounded up to 700 dpa. Figures used in Table 3, page 64 of the dPS 'Strategic Housing Allocation' (and its amendment, see FC1B) were based on the most up-to-date evidence available at the time of publication. In addition figures for affordable housing have been projected over the lifetime of the Plan. The comment on page 62 regarding housing delivery completions since 2005/6 up to the 2017 Housing Monitor baseline is based on a 12 year period, as opposed to the seven year period suggested.</p> <p>At the time of writing the Housing Growth Study, the revised 2016 based HGI paper had not been published (figures were released on 25<sup>th</sup> September 2019) and therefore was unable to be used. The Consultants appointed to undertake the Housing Growth Study have addressed this point and an update is provided.</p> <p>The Council proposes for clarity, as a focussed change, to amend Table 3 of the (dPS), page 64, and relating text on pages 58-63 under the Strategic Housing Allocation, to reflect the most up-to-date HGI data provided at time of publication of the draft Plan Strategy. A minor adjustment (equivalent to 3% of the HGI figure) was made to reflect the mid-point between the two employment led scenarios that were included in the Housing Growth Study (as updated).</p> <p>An Addendum to Technical Supplement 1 Housing Growth Study has also been provided to reflect the HGI update.</p> <p><i>See Annex 1 for amended Table 3 (page 64) and relating text (pages 58-63, Part 1) and Addendum to Technical Supplement 1. (Ref: FC1B Focussed Changes Schedule)</i></p> <p>A buffer of 10% is allowed on top of the HGI to provide for additional flexibility in the Strategic Housing Allocation (see page 58 of dPS). Additionally, the figures in Table 3 (and its amendment) for each Settlement are reduced by 10% to allow for an element of non-deliverability over the Plan period (see page 59 of dPS).</p> <p>Further detail on the 10% buffer is provided in the Housing and Employment Topic Paper, January 2021.</p>
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<p>The following amendments are suggested: SHA should be 15,285 on top of the 1,350 identified at West Lisburn; extend plan period to 2035.</p>	<p>The Council does not agree with revision of the housing figures to those suggested for the reasons outlined above.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>
<p>RSPB NI comment as follows: There are inconsistencies in housing figures between Technical Supplement 1 (TS1) and the dPS. Figures quoted in the dPS are less than those quoted in TS1; whichever figure is used the potential is well in excess of the HGI; vacant stock not considered.</p>	<p>A 10% reduction is applied to Table 3 of the dPS (and its amendment) to allow for an element of non-deliverability over the Plan period. Tables provided in Technical Supplement 1 are an accurate reflection of the figures shown in Table 3. Please note that Table 6 in Technical Supplement 1 informs Column 2 of Table 3, page 64 of dPS, but does not have the 10% reduction applied to it.</p> <p>The Council disagrees with the comment that the figure is well in excess of the HGI. Having undertaken an independent assessment of the HGI following the release of 2016 based household projections (Housing Growth Study, Technical Supplement 1), the Council aligned its Strategic Housing Allocation of (11,550) with the HGI. The HGI is formed using 5 key pieces of data: number of households (household projections); second homes; vacant stock; net conversions/closures/demolitions (net stock loss); and total housing stock.</p> <p>At the time of writing the Housing Growth Study, the revised 2016 based HGI paper had not been published (figures were released on 25<sup>th</sup> September 2019) and therefore was unable to be used. The Consultants appointed to undertake the Housing Growth Study have addressed this point and an update is provided.</p> <p>The Council proposes for clarity, as a focussed change, to amend Table 3 of the (dPS), page 64, and relating text on pages 58-63 under the Strategic Housing Allocation, to reflect the most up-to-date HGI data provided at time of publication of the draft Plan Strategy. A minor adjustment (equivalent to 3% of the HGI figure) was made to reflect the mid-point between the two employment-led scenarios that were included in the Housing Growth Study (as updated).</p>

<p>The following amendments are suggested: reconcile TS1 and dPS figures; re-examination of housing zonings not yet commenced to ensure delivery of compact urban form and prevent over-zoning; outline approach to housing delivery to ensure compact urban form including phasing.</p>	<p>An Addendum to Technical Supplement 1 Housing Growth Study has also been provided to reflect the HGI update.  <i>See Annex 1 for amended Table 3 (page 64) and relating text (pages 58-63, Part 1) and Addendum to Technical Supplement 1.</i>  (Ref: FC1B Focussed Changes Schedule)</p> <p>The Council is content that both the methodology and figures presented in Table 3, page 64 of the dPS, 'Strategic Housing Allocation' (and its amendment, see FC1B), are sound and evidentially based. Previous zonings, which in accordance with paragraph 6.139 of the SPPS, have informed existing commitments, have been through an IE process, and no land has been zoned beyond existing settlement development limits. The Strategic Mixed Use site at West Lisburn/Blaris accords with sustainable forms of development as outlined on page 70 of the SPPS. Strategic Policy SP08 encourages compact urban forms. There is no rationale for the phasing of any housing lands at dPS stage.</p>
<p>Carryduff Regeneration forum request that no additional lands are zoned in Carryduff for housing.</p>	<p>Whilst Strategic Policy SP08 is not directly referred to, the Council notes the comment and can confirm that no additional zonings are identified at this dPS stage in Carryduff.</p>
<p>WPB on behalf of GHF comment as follows: Evidence base is not robust and comprehensive relating in particular to the network of settlements outside the urban areas; housing allocation is based on status quo; needs to be greater recognition of the dPS meeting the wider needs of rural areas; settlement appraisals are not fully utilised in the current plan; no recognition of complementary urban/rural balance.</p>	<p>All settlements have been fully considered in accordance with the Settlement Hierarchy on page 49 of the dPS. A Strategic Settlement Appraisal, consistent with the RDS Housing Evaluation Framework (HEF, page 42), forms part of Technical Supplement 6, Part 4 Countryside Assessment. The Settlement Hierarchy focuses on the Urban Settlements (City, Greater Urban areas, and Towns) along with the Rural Settlements (Villages and Small Settlements). In accordance with paragraph 6.139 of the SPPS, the Council has used this information to inform the judgement around the housing allocation in settlements, to ensure that housing, employment, and associated infrastructure are in the right place to benefit the community as a whole. The housing allocation has been independently verified and sufficient provision exists in the villages and small settlements, in addition to the opportunity afforded through operational policy (in particular Policies COU1-COU16; ED2-ED6) for a range of development in the</p>

<p>Wording should more clearly endorse the ambition to utilise opportunities to promote regeneration and improve access to essential services by linking public and private sector investment.</p> <p>Proposed housing levels do not appear as a coherent strategy and allocations that flow from a robust evidence base; settlement specific recommendations could lead to a more targeted expression of ambitions including the housing needs of a declining rural community.</p>	<p>countryside which may be considered acceptable.</p> <p>Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p> <p>The Council notes the comment and acknowledges that development may involve a range of stakeholders, including both public and private sectors, and can confirm that regeneration is a key focus of the Council’s Economic Development Unit. The emphasis on delivering housing within urban areas is in accordance with paragraph 3.16 of the RDS and paragraph 6.137 of the SPPS, Sustainable Forms of Development.</p> <p>The Council is content that both the housing methodology and figures presented in Table 3, page 64 of the dPS, Strategic Housing Allocation (and its amendment, see FC1B) are sound and evidentially based. Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021</p> <p>The Council disagrees with the statement that the rural area is in decline. Settlements in the rural areas (13 villages and 33 small settlements) have been fully considered in terms of their role in sustaining vibrancy, creating a sense of place, and providing a range of services appropriate to their level within the settlement hierarchy. Table 1 (page 49, dPS) has been amended to take account of the percentage of population in the Countryside.</p> <p>Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p>
<p>Dfl comment as follows: Consideration of the SHA being supportive of compact urban forms and the sequential approach to development.</p>	<p>The RDS Housing Evaluation Framework has informed the preparation of the Council’s Strategic Housing Allocation (SHA) in addition to the eight indicators provided under the SPPS paragraph 6.139. It acknowledges the sequential approach as one of the eight indicators. The SHA focuses on the existing</p>

<p>Need to take account of revised HGI figures and advice from Chief Planner. Also some variation in the methodology used to calculate the 2012 and 2016 HGI and how council have considered this.</p>	<p>Settlement Hierarchy outlined on page 49 of the dPS and has taken account of existing commitments as provided in Table 3 (and its amendment), page 64 (Column 2), and brownfield development opportunity through UCS (Column 3) and Windfall (Columns 4 and 5). Therefore the SHA figure arrived at is supportive of the RDS and SPPS in providing a compact urban form.</p> <p>At the time of writing the Housing Growth Study, the revised 2016 based HGI paper had not been published (figures were released on 25<sup>th</sup> September 2019) and therefore was unable to be used. The Consultants appointed to undertake the Housing Growth Study have addressed this point and an update is provided.</p> <p>The Council proposes for clarity, as a focussed change, to amend Table 3 of the (dPS), page 64, and relating text on pages 58-63 under the Strategic Housing Allocation, to reflect the most up-to-date HGI data provided at time of publication of the draft Plan Strategy. A minor adjustment (equivalent to 3% of the HGI figure) was made to reflect the mid-point between the two employment-led scenarios that were included in the Housing Growth Study (as updated). An Addendum to Technical Supplement 1 Housing Growth Study has also been provided to reflect the HGI update. <i>See Annex 1 for amended Table 3 (page 64) and relating text (pages 58-63, Part 1) and Addendum to Technical Supplement 1. (Ref: FC1B Focussed Changes Schedule)</i></p>
<p>Clarity required on the 10% buffer applied. The total potential deliverable units is above the SHA.</p>	<p>A buffer of 10% is allowed on top of the HGI to provide additional flexibility in the Strategic Housing Allocation (see page 58 of dPS). This potential oversupply provides a degree of flexibility over the Plan period which is sustainable and deliverable. Further detail on the 10% buffer is provided in the Housing and Employment Topic Paper, January 2021.</p>
<p>Use of potential units on zoned land not committed is somewhat confusing relating to existing commitments. This should be houses constructed, existing approvals not yet</p>	<p>Column 2 of Table 3 indicates the remaining potential, which includes information from the Housing Monitor in relation to committed sites with existing planning permission (not yet</p>

<p>constructed and units with reasonable prospect of approval.</p>	<p>built); and existing zonings (where an estimate is provided on sites with no planning permission).</p>
<p>Clarify why 10% reduction was applied to windfall sites and the issue of double counting.</p>	<p>The 10% reduction is applied to all forms of housing supply, as not all windfall sites will be developed over the course of the Plan period. The 12 year allowance for windfall discounts the first three years of the draft Plan Strategy period to ensure no double counting occurs, as the original 2017 baseline figures (identified in Column 2, Table 3) may have included sites that would fall under the windfall category, i.e. sites with planning permission outside zonings.</p> <p>Further detail on the 10% discount is provided in the Housing and Employment Topic Paper, January 2021.</p>
<p>Justification for the West Lisburn lands to become residential and if alternative sites have been considered.</p>	<p>The Council considers that the Strategic Mixed Use site at West Lisburn/Blaris is fully compliant with the RDS Housing Evaluation Framework, which was used to provide the Settlement Appraisal (see Technical Supplement 6 Countryside Assessment, Settlement Appraisal, Part 4). The Settlement Appraisal identifies Lisburn as the main City in the Council area. As identified in the Landscape Character Assessment (Technical Supplement 6), this flat open land can easily be developed with minimal intrusion on the landscape or environment.</p> <p>The sustainability appraisal indicates the SMU01 lands have positive benefits and also are currently within the settlement development limits with land having previously been zoned for employment use. The Council considers that the Strategic Mixed Use site at West Lisburn/Blaris is fully compliant with the SPPS approach, page 70, in relation to sustainable forms of development. Being within the existing settlement development limits, West Lisburn/Blaris is the next sequentially preferential area for housing expansion linked directly to the provision of new jobs, infrastructure (through provision of Knockmore Link Road) enhanced connectivity (through new rail halt and park and ride) and strategic greenway offering open space and linkages for pedestrians/cyclists. Full consideration of</p>

<p>Table 3 is not the preferred distribution but a summary of potential units remaining. Need clarity on relationship between the table and the strategic housing allocation. Table 3 indicates an overall potential figure of 13,782 units 131% above the baseline requirement. Why is West Lisburn required to meet the potential need over the plan period.</p>	<p>SMU01 lands is to be found under that specific strategic policy. Further detail is provided under SMU01 Strategic Mixed Use Site West Lisburn/Blaris.</p> <p>The Council can confirm that Table 3, page 64 of the dPS 'Strategic Housing Allocation' (and its amendment, see FC1B) indicates the full range of housing potential which could be realistically delivered over the Plan period. This figure increases with the inclusion of Urban Capacity and Windfall sites. The delivery of units within all categories of housing supply will be closely monitored.</p> <p>The lands at West Lisburn/Blaris are viewed as critical and a key area of future growth both in socio-economic terms. Further detail is provided under SMU01 Strategic Mixed Use Site West Lisburn/Blaris.</p>
<p>McCready Architects on behalf of nine individuals comment as follows: SP08 does not ensure the strength of the rural community living in villages and small settlements through the proposed housing strategy.</p> <p>Plan period is too short needs extended by 5-6 years to cover a potential shortfall due the</p>	<p>Table 3 of the dPS 'Strategic Housing Allocation' (and its amendment, see FC1B) illustrates there is remaining potential within the villages and small settlements (9.3%). This is largely reflective of the total district population living in villages and small settlements (13%, see amended Table 1) so the distribution of housing provision is considered appropriate and will maintain the strength of the rural community.</p> <p>Whilst approximately 19% of the district's population live in the countryside it would be unsustainable to allocate such a percentage of the SHA to housing in the countryside, based purely on population, as this is contrary to the regional policy approach (SPPS pages 51-55). Operational policies permit appropriate development including new dwellings in the countryside in accordance with the regional policy direction contained in the SPPS.</p> <p>Table 1 (page 49, dPS) has been amended to take account of the percentage of population in the Countryside.</p> <p>Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p> <p>The Planning Act (NI) 2011 does not set out a prescribed period of time that the Plan should cover. Paragraph 2.6 of Development Plan</p>





	<p>policy for residential development in the countryside.</p> <p>Whilst approximately 19% of the district’s population live in the countryside, it would be unsustainable to allocate such a percentage of the SHA to housing in the countryside, based purely on population, as this is contrary to the regional policy approach (SPPS pages 51-55). Operational policies permit appropriate development including new dwellings in the countryside in accordance with the regional policy direction contained in the SPPS.</p> <p>Table 1 (page 49, dPS) has been amended to take account of the percentage of population in the Countryside.</p> <p>Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p>
<p>One2One Planning on behalf of an individual comment as follows: The SHA is disproportionately allocated across the settlement hierarchy; it does not support a sustainable pattern of development with the proportion of growth for Hillsborough inadequate to provide for the required local needs; allocation of 7% to countryside is disproportionate to the population demographic.</p> <p>The following amendment is suggested: Increase the housing allocation to the small town of Hillsborough.</p>	<p>Table 3, page 64 of the dPS, ‘Strategic Housing Allocation’ (and its amendment, see FC1B) illustrates there is remaining potential of 4% of units in Hillsborough. This is largely reflective of its share of the total district population (approximately 3%, see Amended Table 1 and Technical Supplement 1 Housing Growth Study, Table 5).</p> <p>Table 1 (page 49, dPS) has been amended to take account of the percentage of population in the Countryside.</p> <p>Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p> <p>As referred to above, the percentage allocated to the countryside is based on current regional and operational policy and any adjustment to this figure would be contrary to that approach.</p> <p>For the reasons set out the Council does not agree with the suggested amendment to the housing allocation in Hillsborough.</p>
<p>Turley on behalf of Plantation Landowners Group; two individuals; JH Price and Sons; Lagan Homes Ltd; Viewpoint Developments Ltd; Chambers Homes Ltd; Turley; and Glengard Farm, comment as follows: Plan period: this is too short, inconsistent with the SPPS requirement for long term spatial</p>	<p>The time period for the Plan is set out in Departmental Guidance which, in accordance with Soundness Test C3, the Council must take account of. Development Plan Practice Note 01 states (at paragraph 2.6) that the LDP should provide a 15-year plan framework to support the economic and social needs of a council’s</p>

strategy and departmental guidance on a 15 year framework which must logically be from adoption; provide rationale of this view.

Issues raised include:

Delay in adoption of plan estimated 2024.

Comparisons with pre-2015 plans may be difficult due to the passage of time and the timetable may need to be altered to reflect potential risks such as this.

Securing planning permission takes time and this may result in delivery beyond the plan period; this is an issue to deliver the required amount within the plan period but also continuity into the next plan period.

Quote from NPPF suggesting 15 year period is post adoption; SHA sets out plans for too few homes over too short a period and under-allocates, potential to undermine the Spatial Strategy and plan objective A.

HGI: Issue with HGI being policy neutral as stated in the Chief Planners advice; suggests that the HGI figures have not taken regard of the RDS and reduces the extent to which council should take account of them; Chief Planner's letter at odds with RDS (page 43); HGI's are not policy neutral; current HGI figures have not been subject to public consultation or independent examination; welcomes LCCC independent commission on the analysis of HGI; states there are issues with the report in relation to use of other considerations.

district in line with regional strategies and policies, while providing for the delivery of sustainable development; additionally, DPPN 7 Plan Strategy (paragraph 2.8) states that the Plan Strategy should be the spatial reflection of the Council's Community Plan. The Council has aligned the time period of its Plan Strategy with that of its Community Plan 2017-2032.

The inclusion of an additional five year supply beyond the Plan period is also not evidentially based. In accordance with paragraph 5.26 of the SPPS the statutory requirement to monitor the LDP on an annual and five yearly basis will ensure that the LDP is kept up to date and reflects and responds to emerging issues. Paragraph 6.140 of the SPPS states that a 'plan, monitor and manage' approach is necessary to ensure that, as a minimum, a 5 year supply of land for housing is maintained. Monitoring should be an ongoing process with annual reporting and review.

Table 3 page 64 of the dPS 'Strategic Housing Allocation' (and its amendment) indicates, in accordance with the SPPS (paragraph 6.139, processes for allocation of housing land) that the HGI is not a target, and the overall percentage of supply increases with brownfield development (UCS and Windfall sites). The Council is therefore satisfied there is sufficient and sustainable land available for residential use over the Plan period and that this is both realistic and deliverable.

At the time of writing the Housing Growth Study, the revised 2016 based HGI paper had not been published (figures were released on 25<sup>th</sup> September 2019) and therefore was unable to be used. The Consultants appointed to undertake the Housing Growth Study have addressed this point and an update is provided.

The Council proposes for clarity, as a focussed change, to amend Table 3 of the (dPS), page 64, and relating text on pages 58-63 under the Strategic Housing Allocation, to reflect the most up-to-date HGI data provided at time of publication of the draft Plan Strategy. A minor adjustment (equivalent to 3% of the HGI figure) was made to reflect the mid-point

RDS HEF: Sufficient account not taken of RDS to direct growth to the main settlements and achieve a complementary urban/rural balance with reference to Housing Evaluation Framework; the Settlement Appraisals do not appear to have been used to set the housing allocation for any tier of the settlement hierarchy or any individual settlement; allocation has been based on commitments rather than evaluation of growth potential using HEF methodology; Table 3.2 shows under provision in some settlements; from Table 11 in Technical Supplement 1 there is an estimated level of growth of 810 units in the open countryside and only 324 units in small settlements; no proposed managed release of housing land in settlements; to address some of the issues raised it is suggested that revisions be made to certain settlement limits; and the phasing of development over the plan period and beyond is more appropriate to achieve an urban/rural balance of growth.

between the two employment-led scenarios that were included in the Housing Growth Study (as updated).  
 An Addendum to Technical Supplement 1 Housing Growth Study has also been provided to reflect the HGI update.  
*See Annex 1 for amended Table 3 (page 64) and relating text (pages 58-63, Part 1) and Addendum to Technical Supplement 1. (Ref: FC1B Focussed Changes Schedule)*

The Council is content that the outworking of Table 3 of the dPS, Strategic Housing Allocation and its amendment, see FC1B) has been developed in accordance with the SPPS Processes for Allocating Housing Land (page 71) and RDS Housing Evaluation Framework (HEF, page 42) approach outlined, with the main allocation of housing growth being directed to the urban settlements, in particular encouraging the growth of Lisburn City (further enabled through the allocation of a strategic mixed use site at West Lisburn/Blaris); and the remainder of the urban area including the three main towns of Carryduff; Hillsborough & Culcavy; and Moira. A lower level of growth allocated to the rural settlements (villages and small settlements) proportionate to their role and function in supporting the needs of a vibrant rural community. The SPPS indicates the RDS housing evaluation framework as one of 8 indicators, and therefore a balanced judgement has been applied in relation to the growth strategy. The other 7 indicators all play an equal role informing the Council's consideration in assessing the allocation of housing growth across the Council area.

Table 3 of the dPS 'Strategic Housing Allocation' (and its amendment, see FC1B) illustrates there is remaining potential within the villages and small settlements (9.3%). This is largely reflective of the total district population living in villages and small settlements (13%, see amended Table 1) so the distribution of housing provision is considered appropriate and will maintain the strength of the rural community.

The distribution of housing provision is considered appropriate and will maintain the strength of the rural community.

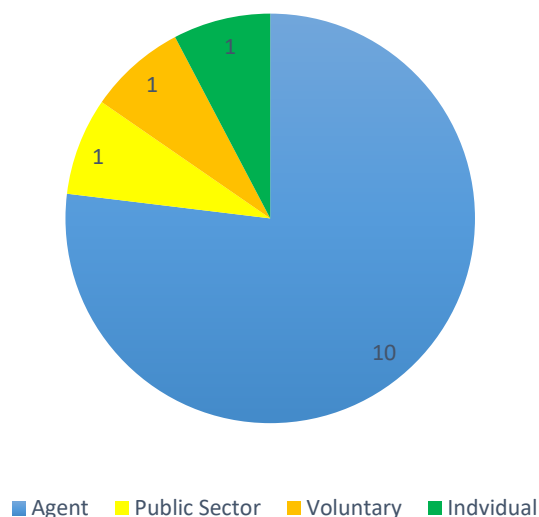
<p>Housing Monitor: not accurate; Sites are dormant or static over considerable period of time. Comparison of 2006-9 and 2016-17 figures suggest no delivery over a considerable period of time hence the 10% discount needs significantly increased.</p> <p>Housing Market Analysis HMA: Does not sufficiently recognise cross-boundary connections in the context of HMA. Nature of Castlereagh to fulfil a complementary role to the high growth rate for Lisburn but also the wider HMA of the Belfast Metropolitan Area.</p>	<p>The percentage of units allocated to the countryside is based on historical trends (using an average figure per annum) and founded on the current policy approach for residential development in the countryside.</p> <p>The figure in amended Table 3 for housing in the countryside is based on past trends, in accordance with existing and proposed operational policy. To grow small settlements exponentially is considered inappropriate and unsustainable in the longer term and contrary to regional guidance of the RDS and strategic regional policy of the SPPS.</p> <p>Table 1 (page 49, dPS) has been amended to take account of the percentage of population in the Countryside.</p> <p>Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p> <p>Housing Monitor data used to inform Table 3 (and its amendment) reflected in Column 2, is based on the most up to date evidence in the form of Housing Completion Certificates supplied by the Council’s Building Control unit. It is accepted that there will always be a degree of lag in the figures from when the site is first recorded as a monitored site through the issuing of a planning approval and the issuing of a building control completion notice. This is unavoidable but not considered significant as the figures are updated on a yearly basis using these two pieces of data and are as accurate as possible at time of publishing.</p> <p>The Housing Growth Study (Technical Supplement 1) took account of the HGI figure but goes further by assessing the wider implications of the housing market area, housing market dynamics, demographics, jobs related growth, and affordable housing need to provide an indication of the projected housing requirements over the Plan period using all available data. The Council is content that the approach and methodology applied is both realistic and deliverable.</p>
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<p>Affordable housing: Provide significant requirement for social/affordable homes within the plan period. No original data set from NIHE to base figures upon. Figures in the technical supplement conflict with dPS in relation to social and affordable housing as to how this is delivered. HMA referenced but not specifically included within the supporting evidence base.</p> <p>West Lisburn: Over estimates the potential contribution of various sources of housing supply. Over reliance on West Lisburn. History would indicate a lag in the planning system from permission to build out, West Lisburn will not contribute significantly to the figures during the plan period but most likely in the period beyond 2032.</p>	<p>The Council receives its Housing Needs Assessment (HNA) as part of the NIHE Housing Investment Plan publication. The HNA is also included in the Housing Executive’s Commissioning Prospectus. In addition the NIHE published a Housing Market Analysis (HMA) Update which provides evidence in order to develop integrated housing policies and approaches. The Council has provided this update as one of its submission documents and it is also available from the Housing Executive on request.</p> <p>The Council has considered the figures for affordable housing need and acknowledges that an error has occurred. The Council proposes for clarity, as a focussed change, to amend the figure (based on the 2018 Housing Investment Plan Update) as follows:  <u>Page 28</u>: “Extrapolating this figure over the Plan period from 2017-2032 equates to an estimated figure of approximately 2,400 <i>social housing dwelling</i> units. An additional need is also indicated for intermediate housing which equates to an additional projected need for <del>3,840</del> <i>1,920</i> units over the Plan period.”  <u>Page 61</u>: “The total affordable housing requirement for the Plan period is <del>6,240</del> <i>4,320</i> units of which 2,400 are social housing units.”  (Ref: FC1A Focussed Changes Schedule Part 1)</p> <p>SMU01 West Lisburn/Blaris is a strategic site which is a key driver in the socio-economic ambitions of the Council therefore delivery of this strategic site is considered vital. The delivery of housing towards the end of the Plan period and beyond ensures capacity beyond the notional end date of the Plan, as Table 3 (and its amendment) indicates if all potential is realised then the Council has capacity beyond 2032.</p>
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## Strategic Policy 09 Housing in the Countryside

There were thirteen representations received in respect of Strategic Policy 09 Housing in the Countryside.

### Strategic Policy 09 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-039	Inaltus Limited on behalf of O'Kane Property Ltd
DPS-063	Individual
DPS-090	Dundonald Green Belt Association
DPS-105	WPB on behalf of GHF
DPS-114	McCready Architects on behalf of Individual
DPS-115	McCready Architects on behalf of Individual
DPS-116	McCready Architects on behalf of Individual
DPS-117	McCready Architects on behalf of Individual
DPS-118	McCready Architects on behalf of Individual
DPS-120	McCready Architects on behalf of Individual
DPS-121	McCready Architects
DPS-123	McCready Architects

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the strategic policy.	The Council notes the supportive comment.
Inaltus on behalf of O'Kane Properties Ltd comment that SP09 constrains housing on the edge of settlements to prevent the marring of urban and rural areas. In some cases there are industrial areas adjacent, or on the edge of settlements and their reuse would enhance the	The Council notes there is provision under operational policies ED3 and ED4, in particular, for redevelopment of such existing industrial areas for employment or business purposes. Operational policy ED4 does also however stipulate that redevelopment for

<p>appearance of the settlement. SP09 should therefore include an exception 'where edge of settlement development includes reuse of old industrial buildings where the setting of the settlement can be enhanced'.</p> <p>Further modification is suggested. SP09 should support edge of urban housing proposals that are in scale with its rural settlement, involves redevelopment of old industrial lands and enhances the appearance of the settlement and will not add to urban sprawl.</p>	<p>tourism, outdoor sport and recreation or local community facilities will be viewed sympathetically where all the criteria in the policy are met. Currently such areas are located in the countryside and appropriate policies apply.</p> <p>There is no rationale to bring such sites inside a settlement development limit or to include an exception in Strategic Policy SP09 to permit residential use on such sites. Any amendments to settlement development limits will be considered as part of the Local Policies Plan (LPP) stage.</p>
<p>One representation from an individual seeks to reduce part of the settlement limit at Feumore with general point to protect all existing settlements from unwanted development pressures.</p>	<p>The Council notes the comment and suggests that Strategic Policy SP09 will protect against urban sprawl. The settlement development limits will be considered at LPP stage.</p>
<p>Dundonald Green Belt Association comment that the approach to housing in the countryside appears insufficiently robust to manage rural commuter development pressures in the area immediately around Belfast and Lisburn.</p>	<p>The Council is of the opinion that Strategic Policy SP09 in conjunction with operational policies for housing in settlements (HOU1-12) and the countryside (COU1-16) are robust and direct development to the most appropriate places (within urban settlements), whilst allowing for a thriving rural area. Transport issues are addressed through the Local Transport Study (Technical Supplement 8) and focuses on growth and connectivity. The detail of specific schemes will be added to this at Local Policies Plan Stage, when land use zonings are identified.</p>
<p>WPB on behalf of GHF comment that SP09 should more clearly endorse the ambition to utilise opportunities at a strategic level to promote regeneration and improve access to essential services.</p>	<p>The Council is of the opinion that Strategic Policy SP09, in conjunction with operational policies for housing in settlements (HOU1-12) and the countryside (COU1-16), robustly directs development to the most appropriate places (within urban settlements), whilst still promoting thriving rural areas. Operational policies for development in the countryside (COU1-16), including housing policies, sustain rural communities through regeneration of housing stock and the provision for housing for established, qualifying, rural businesses. The Council considers the provisions of SP09 reflect strategic policies in this regard and does not intend to make further amendments.</p>
<p>Consider it currently promotes dereliction in urban areas. Suggested amendment to SP09 to</p>	<p>The Council does not agree with this assertion. Strategic Policy SP12 Economic Development in the Countryside details</p>

<p>refer to the specific ambition to achieve rural regeneration where necessary.</p> <p>Consider there is no robust settlement appraisal translated into strategic policies which overlooks key development opportunities.</p>	<p>specifically how the Plan can facilitate and support rural communities. This ties in with Operational policies (in particular COU11 to COU14) which support regeneration in the rural areas subject the criteria outlined. The minor change outlined above enhances SP09 in this regard.</p> <p>Strategic Policy SP09 relates specifically to housing in the countryside and seeks to support appropriate development in the countryside while protecting the established rural settlement pattern. The Strategic Housing Allocation outlined in Table 3 page 64 of the dPS 'Strategic Housing Allocation' (and its amendment, see FC1B) is considered sound and has been developed in accordance with the SPPS Processes for Allocating Housing Land (page 71) and RDS Housing Evaluation Framework (HEF, page 42).</p> <p>Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p>
<p>McCready Architects on behalf of a number of clients state that SP09 prohibits necessary and appropriate expansion into the countryside around established villages and small settlements.</p> <p>Consider the policy is unsound as it does not ensure the strength of a rural community living in villages and settlements.</p>	<p>Strategic Policy SP09 does seek to prohibit unnecessary and inappropriate expansion into the countryside irrespective of location. The Strategic Housing Allocation outlined in Table 3 page 64 of the dPS 'Strategic Housing Allocation' (and its amendment, see FC1B) is considered sound and developed in accordance with the SPPS Processes for Allocating Housing Land (page 71) and RDS Housing Evaluation Framework (HEF, page 42). SP09 therefore assists in protecting the countryside and the wider rural area from inappropriate development and urban sprawl.</p> <p>Table 1 (page 49, dPS) has been amended to take account of the percentage of population in the Countryside.</p> <p>Further detail on the application of the RDS HEF is contained within the Housing and Employment Topic Paper, January 2021.</p> <p>The Council disagrees with this assertion. Appropriate opportunities for development in the countryside and rural settlements are provided. As stated previously, the Strategic Housing Allocation is in accordance with the</p>

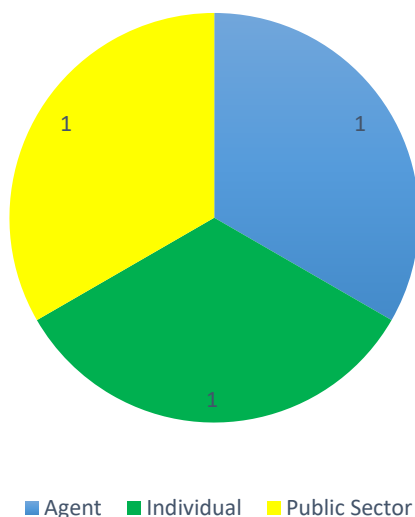


	RDS Housing Evaluation Framework. Sufficient capacity exists to allow for residential development within existing settlement development limits which includes villages and small settlements.
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## Strategic Policy 10 Education, Health, Community and Culture

There were three representations received in respect of Strategic Policy 10 Education, Health, Community and Culture.

### Strategic Policy 10 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-045	Individual
DPS-105	WPB on behalf of GHIL

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy to protect land for such services. Would like to see section 76 agreements to facilitate such services as a result of planning permissions being granted and the uplift in the overall value of the land.	The Council welcomes the support for Strategic Policy SP10. Section 76 agreements will play a role in the delivery of such services identified.
One representation from an individual, whilst not referring directly to SP10, suggests the proposed site submitted would be suitable for a healthcare facility or a recreation facility for Dromara. Consideration should be given to include site for residential purposes.	The Council notes the comment but points out that this is site specific matter that should be addressed through the Local Policies Plan. Additionally, the Council would suggest representation be made to the Council's Community Planning team in respect of the request for healthcare and recreation provision.
WPB on behalf of GHIL whilst not referring directly to SP10 comment that the provision of community facilities and statutory facilities to	The Council points out that Strategic Policy SP10 aims to support development opportunities which would benefit

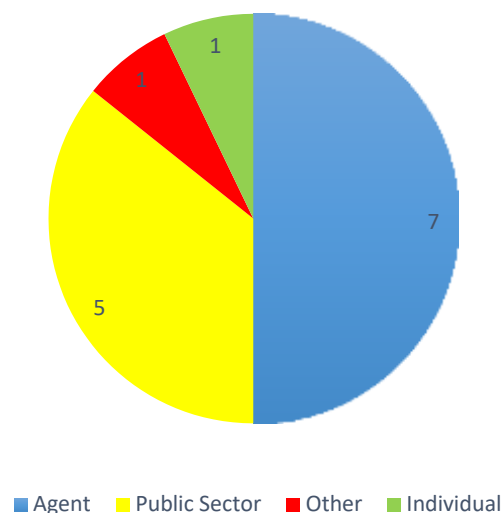
<p>target specific aims such as youth, education, health and other local service needs to be carefully coordinated at a strategic level to ensure effective and efficient community planning.</p>	<p>communities, in conjunction with operational policies outlined in Part 2 of the dPS.</p>
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## **B: A THRIVING PLACE**

### **Strategic Policy 11 Economic Development in Settlements (Includes Strategic Employment Allocation)**

There were fourteen representations received in respect of Strategic Policy 11 Economic Development in Settlements.

### Strategic Policy 11 by Respondent Type



#### **Respondents**

Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-013	Antrim and Newtownabbey Borough Council
DPS-020	Individual
DPS-033	Clyde Shanks on behalf of Neptune Carleton LPP
DPS-044	Turley on behalf of Lagmar Properties Ltd
DPS-056	TSA Planning on behalf of Individual
DPS-059	TSA Planning on behalf of Individual
DPS-062	TSA Planning on behalf of Unicorn Group
DPS-064	Invest NI
DPS-068	TSA Planning on behalf of Rosemount Homes (Carryduff) Ltd
DPS-082	Clyde Shanks on behalf of John Thompson & Sons Ltd
DPS-109	Department for Infrastructure (DfI)
DPS-128	Blakiston Houston Estates Company

#### **Council Consideration of Issues Raised**

Main Issue(s) Raised	Council Consideration
Armagh City, Banbridge and Craigavon Borough Council sought clarification on the scope/terms of an employment land review at LPP stage (dPS, Part 1, SP11 Justification and Amplification, paragraph 4, page 76) as this	The Council's Strategic Policy SP11 Economic Development in Settlements sets out the strategic employment allocation of land following its Employment Land Review (ELR) presented in Technical Supplement 3. This

<p>may impact their Borough if it returns a need for a significant quantity of additional employment land.</p>	<p>identifies 220 hectares of existing developable land for economic uses. The ELR forecast several scenarios (using baseline based on economic forecasts; past employment trends; labour supply; and past completions). The latter scenario suggests a need for 45 hectares of employment land over the LDP period. The Council considers given the existing supply that it is unlikely to identify a further significant quantum of land being zoned at LPP stage and therefore it is considered that there is no detrimental impact on adjacent councils. A full review will be carried out at the LPP stage to determine the designation of sites based on the ELR in accordance with Strategic Policy 11.</p>
<p>NIHE welcome strategic policy focus for economic development in settlements, including the proposed SMU site at West Lisburn/Blaris and local employment sites. They support barrier free locations within the urban footprint, near to residential areas or close to centres, which are accessible by means other than the private car.</p>	<p>The Council notes the comments.</p>
<p>An individual supports a previously zoned area of employment land and that it should remain as such going forward.</p>	<p>The Council notes the comment. A full review will be carried out at the LPP stage to determine the designation of sites based on the ELR in accordance with Strategic Policy 11.</p>
<p>Clyde Shanks on behalf of Neptune Carleton LPP though its support of SMU01 subsequently supports this policy SP11(a)</p>	<p>The Council notes the comment.</p>
<p>TSA Planning on behalf of an individual support the retention of existing employment zonings.</p>	<p>The Council notes the comment.</p>
<p>TSA Planning on behalf of an individual seeks to add to the land available for employment use.</p>	<p>The RDS states under regional guidance RG1 that there should be an adequate and available supply of employment land. It should be accessible and located to make best use of available services. The LDP must assess the <i>“quality and viability of sites zoned for economic development uses”</i>. Critically, it states that it is important that decisions are not based purely on the quantum of land available, but how well connected it is. The Employment Land Review ((Technical Supplement 3) identifies 220 hectares of existing developable land for economic uses. A full review will be carried out at the LPP stage to determine the designation of sites based on the ELR in accordance with Strategic Policy 11.</p>
<p>Invest NI notes the commitment by the Council to retain a continuous supply of developed and undeveloped economic land throughout the</p>	<p>The Council considers there is no conflict between SP11(c) and Policy PED7 of PPS4 as, in accordance with paragraph 1.11 of the SPPS,</p>

<p>plan period. They comment that SP11(c) as written has potential to conflict with the existing Policy PED7 of Planning Policy Statement 4.</p>	<p>following adoption of the LDP draft Plan Strategy, the policies of PPS4 will cease to be material to planning applications.</p>
<p>Antrim and Newtownabbey Borough Council, Turley on behalf of Lagmar Properties Ltd, TSA Planning on behalf of Unicorn Group and Rosemount Homes (Carryduff) Ltd, question the need to retain 220 hectares of employment land, given that the ELR best case scenario indicates only 45 hectares are needed. The Council should have assessed existing sites and determined which were to be retained and which rezoned because of their failure to deliver employment developments. Current zonings are 5 times higher (7 times higher if strategic sites are included) than that need identified in the ELR. No explanation given as to why only 20 of the 30 sites were assessed in the ELR, no consideration in the dPS of individual site assessments in the ELR. Council has not taken account of reasonable alternatives which is inconsistent with its evidence base. Most are greenfield sites and contradicts sustainability objectives of the RDS and SPPS which recognises reuse of previously developed land. No assessment has been made of brownfield sites across the Council area for employment use. LDP should be amended to review and refine all employment sites to existing, suitable and unzoned brownfield sites ahead of new greenfield zoned sites.</p>	<p>The Council disagrees with the assertions made in these representations and would argue that the approach taken by the Council is sound, as it accords with both the RDS and SPPS regional policy approach.</p> <p>The RDS states under regional guidance RG1 that there should be an adequate and available supply of employment land. It should be accessible and located to make best use of available services. The LDP must assess the <i>“quality and viability of sites zoned for economic development uses”</i>. Critically, it states that it is important that decisions are not based purely on the quantum of land available, but how well connected it is. Table 3.1 (page 32 of the RDS) sets out the 3 stages of the Employment Land Evaluation Framework – Stage 1 Taking Stock of the Existing Situation; Stage 2 Understanding Future Requirements; and Stage 3 Identifying a ‘New’ Portfolio of sites. Three points are made in relation to this framework:</p> <ol style="list-style-type: none"> <li>1 Protect Zoned Land – protection of such zonings ensures a variety of suitable sites are available</li> <li>2 Promote economic development opportunities across the Region – clustering of business services</li> <li>3 Provide a network of economic development opportunities – making provision in the LDP for an <i>“adequate and continuous supply”</i> of employment land.</li> </ol> <p>The SPPS further strengthens this approach under paragraph 6.82 through its 6 regional strategic objectives.</p> <p>Paragraph 6.92 is explicit in setting out the requirements of the LDP to offer a <i>“range and choice of sites in terms of size and location to promote flexibility and provide for the varying needs of economic activity.”</i> It also recognises that monitoring the take up and loss of land will help to identify any shortfalls or highlight the need to reconsider the proposed uses of the sites.</p>

	<p>The Council assessed the range of employment sites zoned through BMAP and is content that the approach to their selection is both relevant and viable.</p> <p>Whilst a sample of 20 of the total 30 employment sites was considered a robust sample. For completeness the Council has carried out an assessment on the remaining 10 sites, which is provided in the Housing and Employment Topic Paper, January 2021. The range of sites available ensures that a variety for different needs are available. The Employment Land Review (Technical Supplement 3) identifies the clustering of these in accordance with the RDS Framework, at: 1) Lisburn, 2) Derriaghy, 3) Carryduff, 4) Newtownbreda, and 5) Dundonald.</p> <p>This will ensure that the economic conditions provide a range and size of suitable sites across the Council area, recognising the link between the provision of jobs and housing; that there is not an over-reliance on the rest of the BMA for fulfilling this role; and the long-term local economy will not be stifled, particularly where threats from alternative land uses (such as housing) may exist.</p> <p>The Council therefore suggests that the comments made are not evidenced, and that adequate provision for monitoring will ensure the availability and viability of land is properly assessed at the appropriate stage as part of preparation of the Local Policies Plan.</p>
<p>Dfl (Strategic Planning, Roads and Transport Planning and Modelling Unit) noted and generally supported the rationale for the Strategic Mixed Use sites and Local Employment sites.</p>	<p>The Council notes the comment.</p>
<p>Clyde Shanks on behalf of John Thompson and Sons Ltd. In response to a specific they welcome SP11 in particular (c) which seeks to encourage mix use schemes supporting regeneration on sites previously used for economic purposes. SP11 should recognise within the J&amp;A that on such sites it is appropriate to allow mixed use proposals that deliver a proportionate amount of light industry or other business units that will not be detrimental to residential amenity as part of a wider scheme that includes sufficient other</p>	<p>The Council notes the comment. The primary focus of the policy is to continue to cater for the economic needs of the Council area. Whilst the J&amp;A does not specifically refer to housing part (c) of the policy does encourage mixed use schemes to support regeneration of a site. Operational policy ED7 does allow residential use as an element of that regeneration on unzoned land provided it brings substantial community benefits outweighing the loss of the site for economic development use.</p>

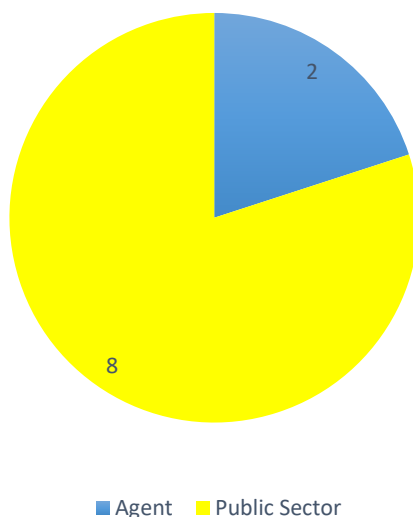
<p>types of development, including housing, as a catalyst to regenerate a site.</p>	
<p>Blakiston Huston Estates Company make a site specific representation on exiting zoned employment land which is as yet undeveloped. The mix of uses are suggested to be included housing.</p>	<p>The Council notes the comment. The site was zoned as employment land in BMAP and the Employment Land Review (Technical Supplement 3) recognises Dundonald as a key employment area. The site forms part of the quantum of land identified in the ELR to provide a range and type of land for employment uses (see SP11(b)). A full review will be carried out at the LPP stage to determine the designation of sites based on the ELR in accordance with Strategic Policy 11.</p>



## SMU01 West Lisburn/Blaris

There were ten representations received in respect of Strategic Mixed Use Designation 01 West Lisburn/Blaris.

### SMU 01 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-006	Translink
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-017	Les Ross Planning
DPS-030	Department for Communities - Historic Environment Division (HED)
DPS-033	Clyde Shanks on behalf of Neptune Carleton
DPS-041	Belfast City Council
DPS-060	Department of Agriculture, Environment & Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-064	Invest NI
DPS-084	Ards and North Down Borough Council
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Translink provide a general comment that Strategic Mixed Use developments identified within the strategy are in areas already experiencing high levels of traffic congestion. It suggests that extensive mitigation by way of modal shift to sustainable transport, will be necessary if these developments are to be sustainable.	The Council agrees with the comment provided and would point out that Key Site Requirement (g) of Strategic Mixed Use Designation SMU01 has made provision for this and it is also expanded upon in the J&A. The Council would encourage further dialogue with Translink and DfI in the development of the emerging BMTP

	and Local Transport Plan to accompany the Local Policies Plan.
NIHE supports barrier free employment locations within the urban footprint near to residential areas/centres and accessible by means other than the private car.	The Council notes the supportive comment.
Les Ross Planning considers that the draft Plan Strategy promotes the SMU over other employment zonings, this is not a balanced geographical spread across the Council area. Recommends that this policy should be removed. The detail associated with this zoning should be established at LPP stage.	<p>The Strategic Mixed Use Site SMU01 West Lisburn/Blaris is one of two sites at key strategic positions east and west of the Council area (see also SMU02 Purdysburn/Knockbracken), offering opportunity for significant inward investment. Whilst the SMUs identified form the top tier of the employment lands hierarchy (dPS page 77) it does not diminish the value of other existing zoned local employment sites, in terms of providing a range and choice of sites for different employment needs in accordance with the SPPS. The RDS also recognises the importance of this site as a key location for economic growth along with Lisburn City as a major employment centre under SFG1 (page 56 of RDS), being strategically located at the meeting of key transport corridors with high development potential to generate additional jobs.</p> <p>The SPPS paragraph 6.94 states that Plans should indicate through key site requirements, the types of economic development that will be acceptable and seek to avoid uses that would have a detrimental impact on the environment and/or residential amenity. It is therefore considered important to set out now the KSRs for these sites, rather than wait to LPP stage, as this defines their direction as sites for significant inward investment in accordance with the SPPS.</p> <p>Further detail on the inclusion of West Lisburn/Blaris as a strategic housing site is contained within the Housing and Employment Topic Paper, January 2021</p>
HED considers this policy could be more sound (consistency test C4), in that evidence from related plans and policies has not been taken into account. HED refer to BMAP District Proposals for Lisburn (pages 24 – 25), where the amplification text required included; “Detailed consultation with Northern Ireland Environment Agency (Built Heritage), DOE, will	The Council notes the comments and considers matters to do with previously unidentified archaeological remains are appropriately addressed through its Operational Policy HE2 – Archaeological Assessment and Evaluation and HE3 Archaeological Mitigation. Both these policies require the Council to consult HED on the potential for development proposals to

<p>be required with regard to the identification and treatment of buried archaeological remains.”</p> <p>HED is concerned this has not been carried forward to this dPS zoning and in order to address the likely impact on previously unidentified below ground archaeological remains they advise the following sentence should be inserted at the end of the amplification text for SMU01;  “Detailed consultation with DfC Historic Environment Division, will be required with regard to the identification and treatment of buried archaeological remains.”</p>	<p>impact and affect unknown archaeological remains.</p> <p>The Council notes from the HED Historic Environment Map Viewer that this draft zoning shows few known historical references within it and that it is neither zoned as an Area of Significant Archaeological Interest or an Area of Archaeological Potential. The Council does not discount such zonings coming forward at the Local Policies Plan stage of its Plan Strategy. Strategic Policy 18 Protecting and Enhancing the Historic Environment and Archaeological Remains, and representations to its content, expand on these points.  For these reasons the Council does not intend to insert the wording as suggested by HED.</p>
<p>Clyde Shanks on behalf of Neptune Carleton considers the uses allowed on the site are too restrictive</p> <p>Clyde Shanks on behalf of Neptune Carleton considers Map 7 (dPS, Part 1, page 79) shows no development West of the M1-Knockmore link Road. This is not founded on robust evidence; the settlement limit is too restricted. The River Lagan floodplain is the natural and effective containment to the expansion of the City. The West Lisburn Development Framework (WLDF) reflects a more accurate SDL.</p>	<p>The Council considers the use classes stipulated in the Key Site Requirements (KSRs) to be clear and transparent in terms of the range of acceptable uses. These uses complement one another, particularly small scale retailing (A1) and healthcare facilities (D1(a)) which support the two main uses of housing and employment. The dPS removes hotel and ancillary leisure facilities, and car showrooms which were provided for under the previous Development Plan (BMAP) as these are no longer deemed necessary to support the housing and employment uses, and are generally more akin to those proposed nearby at Sprucefield SMU03. A KSR (from BMAP) for a school has also been removed. The Department of Education advised that site specific requirements for schools arise only where there is no availability within the existing catchment. Further engagement with the Education Authority (EA) will be carried out at the Local Policies Plan stage.</p> <p>The Council considers Map 7 of the dPS, page 79, for SMU01 West Lisburn/Blaris, reflects that set out in Map 2/0001 of draft BMAP. The new road link also in draft BMAP defines a firm edge to the Settlement Development Limit. The WLDF is a non-statutory framework that has not been subject to Examination in Public, Strategic Environmental Assessment or Habitats Regulation Assessment. On the contrary BMAP is a draft (statutory)</p>

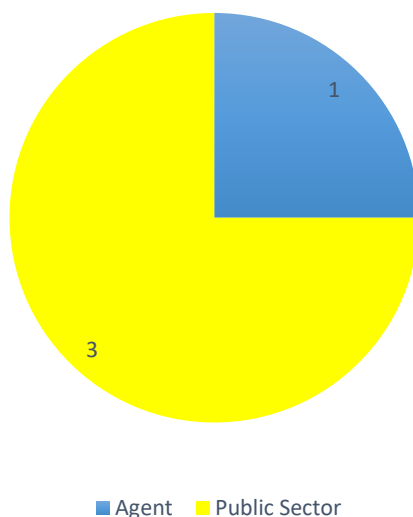
	<p>Development Plan, and has been subject to public examination, and other statutory assessments.</p> <p>The WLDF, as a non-statutory framework document, has helped inform the Plan by setting out the ambition of the Council for West Lisburn/Blaris as a strategic mixed-use zoning, which the Council in accordance with Soundness Test C4 has had regard to in preparing the LDP. The WLDF 2018 Review (June 2019) does not conflict with the draft Plan Strategy's in respect of the edge or extent of the Settlement Development Limit.</p>
<p>Belfast City Council considers SMU01 runs contrary to the SPPS Regional Strategy Objective (paragraph 6.297, page 106) to promote sustainable patterns of development and reduce the need for motorised transport. It is also contrary to SP20 of the dPS (Part 1, page 139)</p> <p>Belfast City Council considers SMU01 may underachieve in its employment aspirations, which could lead to pressure to provide a larger share of the lands for housing.</p>	<p>The Council considers Strategic Policy SMU01 seeks the following through a masterplan:</p> <ul style="list-style-type: none"> <li>• The Knockmore link road - this caters for the employment element of the site and acts on a sub-regional scale as a bypass from/to the M1, A1, North Feeder Road, Lisburn and beyond to Belfast and further North;</li> <li>• Provision of enhanced public transport infrastructure - including linkages to the new West Lisburn rail halt and associated P&amp;R (which the Council has referred to as being strategically important in the development of the new BMTP) and Sprucefield Park &amp; Ride</li> <li>• Walking and cycling infrastructure - within and linking the site to a car free primary Strategic Greenway which links to the National Cycle Network (NCN9).</li> </ul> <p>These provisions fully meet the requirements of the RDS, Policy RG2: Deliver a balanced approach to transport infrastructure and paragraph 6.297 of the SPPS. The zoning also complies with all the points (a-d) of SP20 Transportation Infrastructure of the dPS. Further detail on the inclusion of West Lisburn/Blaris as a strategic housing site is contained within the Housing and Employment Topic Paper, January 2021.</p> <p>Strategic Policy SMU01 requires its development to be in accordance with an agreed concept masterplan which must allow for a 50/50 split between housing and those other land uses stated. As the masterplan forms part of any future development proposals, planning decisions must be taken in</p>

	<p>accordance with this. The statement by BCC is at odds with the direction provided under Section 6.4 of the Planning Act (NI) 2011 which refers to the plan-led system.</p>
<p>NIEA seek assurance that natural heritage features will be retained and enhanced. If natural features are lost then mitigation should be undertaken; and green and blue infrastructure used to connect the development.</p>	<p>The Council notes the comments and considers these are matters which can be addressed by adherence to the Key Site Requirements (KSRs) and demonstration, through a development proposal, of compliance with relevant Operational Policy in dPS, Part 2.</p>
<p>Invest NI, Ards and North Down Borough Council and DfI have raised concern and/or queried why housing is included on lands previously zoned for employment use.</p>	<p>The Council considers there is a sound rationale for providing a strategic element of housing at this site, whilst retaining and recognising the site's strategic employment contribution and potential for inward investment. The Council has considered the RDS 2035 (RG8) and the SPPS (paragraph 6.134) which emphasises the benefits in co-locating housing, jobs, facilities, services and infrastructure. As identified in Technical Supplement 3 Employment Land Review, there is an ample and readily available supply of existing zoned employment land throughout the Council area. Whilst the site is located at a key transport intersection and encouraged for strategic economic growth, part of its use to meet projected housing growth is considered key to unlocking its development potential and meeting wider economic objectives of the Council.</p> <p>Further detail on the inclusion of West Lisburn/Blaris as a strategic housing site is contained within the Housing and Employment Topic Paper, January 2021.</p>
<p>Invest NI welcomes the allowance for B1(a) office provision where demonstrated that a proposal cannot be accommodated in Lisburn City Centre.</p>	<p>The Council notes the comment.</p>

## SMU02 Purdysburn/Knockbracken

There were four representations received in respect of Strategic Mixed Use Designation 02 Purdysburn/Knockbracken.

### SMU 02 by Respondent Type



#### Respondents

Reference Number	Respondent
DPS-006	Translink
DPS-017	Les Ross Planning
DPS-060	Department of Agriculture, Environment & Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-064	Invest NI

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Translink provide a general comment that Strategic Mixed Use developments identified within the strategy are in areas already experiencing high levels of traffic congestion. It suggests that extensive mitigation by way of modal shift to sustainable transport, will be necessary if these developments are to be sustainable.	The Council agrees with the comment provided and would point out that Key Site Requirement (f) of Strategic Mixed Use Designation SMU02 has made provision for this. The Council would encourage further dialogue with Translink and DfI in the development of the emerging BMTP and Local Transport Plan to accompany the Local Policies Plan.
Les Ross Planning considers that the draft Plan Strategy promotes the SMU over other employment zonings, this is not a balanced geographical spread across the Council area.	The Strategic Mixed Use Site SMU02 Purdysburn/Knockbracken is one of two sites at key strategic positions east and west of the Council area (see also SMU01 West Lisburn/Blaris), offering opportunity for significant inward investment.

<p>Recommends that this policy be removed. The detail associated with this zoning should be established at LPP stage.</p>	<p>Whilst the SMUs identified form the top tier of the employment hierarchy (page 77 of the DPS) it does not diminish the value of other existing zoned local employment sites, in terms of providing a range and choice of sites for different employment needs in accordance with the SPPS. The RDS recognises the importance of this site as a key location for economic growth under SFG1 being connected to public transport to support the drive to provide a range of opportunities for job creation.</p> <p>The SPPS paragraph 6.94 states that Plans should indicate through key site requirements, the types of economic development that will be acceptable and seek to avoid uses that would have a detrimental impact on the environment and/or residential amenity. It is therefore considered important to set out now the KSRs for these sites, rather than wait to LPP stage, as this defines their direction as sites for significant inward investment in accordance with the SPPS.</p>
<p>NIEA seek assurance that natural heritage features will be retained and enhanced. If natural features are lost then mitigation should be undertaken; and green and blue infrastructure used to connect the development.</p>	<p>The Council notes the comments, these are matters which can be addressed by adherence to the Key Site Requirements (KSRs) and demonstration, through a development proposal, of compliance with relevant Operational Policy in the dPS, Part 2.</p>
<p>Invest NI refers to its POP submission (paragraphs 36 and 37) in relation to KSRs and the need to keep industrial/residential uses separate; Council may wish to reflect further on the balance of development types on SMU02</p> <p>Invest NI refers to the KSRs not stipulating minimum or maximum quanta for residential or economic uses proposed on the Purdysburn/Knockbracken site, this could result in the residential use becoming predominant, undermining potential strategic economic uses.</p>	<p>Invest NI raised in paragraph 36 of its POP representation that industrial elements on SMU02 should remain separated from residential uses. The Council considers the Key Site Requirements (KSRs) associated with a masterplan for this site, specifically KSR (j), the provision of appropriate open space/landscape buffers between uses to ensure no adverse impact on amenity of residential occupiers, addresses the separation issue raised.</p> <p>In relation to the maximum/minimum quantum of economic or residential use, the Council considers KSR (h) to provide a sufficient degree of flexibility for employment generating uses on the site without being overly prescriptive, and therefore it is not necessary to stipulate the quantum of land for the uses considered to be acceptable. All development proposals would be subject to a master plan and consultation with the relevant statutory consultees.</p>

Invest NI welcomes the allowance for B1(a) office provision where demonstrated that a proposal cannot be accommodated in Lisburn City Centre.

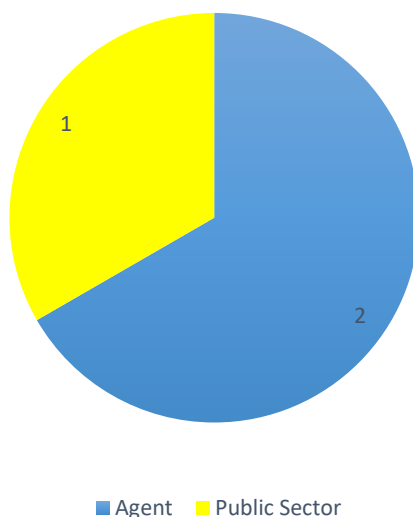
The Council notes the comment but would point out that there is no requirement currently to demonstrate availability of B1(a) office accommodation in Lisburn City Centre before development at this site. The purpose of KSRs is to provide clarity on the range of uses acceptable, without the need for any sequential test unless specified.



## Strategic Policy 12 Economic Development in the Countryside

There were three representations received in respect of Strategic Policy 12 Economic Development in the Countryside.

### Strategic Policy 12 by Respondent Type



### Respondents Received

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-039	Inaltus Limited on behalf of O'Kane Property Ltd
DPS-119	McCready Architects on behalf of individual

### Council Consideration of Issues Raised

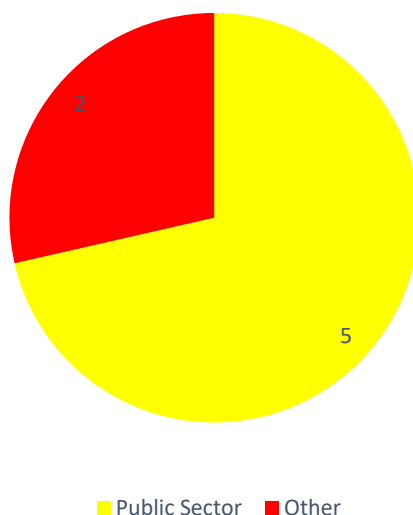
Main Issue(s) Raised	Council Consideration
NIHE supports business growth outside development limits where there are no suitable sites available in Towns and Villages. These are important for sustaining rural communities. Proposals should be of appropriate scale and not compromise rural character and the environment	The Council notes the supportive comment.
Inaltus on behalf of O'Kane Property Ltd and McCready Architects on behalf of an individual, make representation on site specific portions of land.  Inaltus seeks to redevelop existing industrial land for mixed use (industrial and residential) and considers SP12 endorses this. McCready Architects seeks a small extension to industrial	The Council, while noting both representations, does not consider these raise specific comment on the basis/content of Strategic Policy SP12.  In relation to Inaltus comments provided, the Council does not agree Strategic Policy SP12 Economic Development in the Countryside, endorses mixed use redevelopment of an existing industrial site. Neither the wording of

<p>lands as the dPS provides an imbalance of such lands, favouring the largest settlement.</p> <p>McCready Architects justifies limited economic opportunities to help maintain family / generational links and meet a demand across the rural area of the dPS, strengthening local/rural communities without impacting on the countryside.</p>	<p>the policy or the J&amp;A suggest such endorsement. The appropriate mechanism to propose the redevelopment of existing industrial lands to alternate uses would be at the Local Policies Plan stage or conversely through the submission of a planning application, assessed against all relevant policies including Operational Policies set out in Part 2 of the dPS.</p> <p>McCready Architects' representation, whilst highlighting Strategic Policy SP12 (as well as Operational Policy ED3 Expansion of an Established Economic Development Use in the Countryside) only quantifies it is unsound because of a perception of imbalance between rural/urban employment land provision which is more appropriately addressed under the Strategic Employment Allocation identified under Strategic Policy SP11 Economic Development in Settlements. No regard has been given by the representation to the nearby employment lands at Glenavy or Glenavy Road, Moira (see dPS part 1 page 85, Table 5, GY05 and LN07) which facilitate the rural population at this location. Strategic Policy SP12 (and Part 2 Operational Policies) would be used to consider such an extension to the existing industrial site. However the issue of zoning site specific land is considered a matter for the Local Policies Plan stage.</p>
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## Strategic Policy 13 Mineral Development

There were seven representations received in respect of Strategic Policy 13 Mineral Development.

### Strategic Policy 13 by Respondent Type



#### Respondents

Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council
DPS-013	Antrim and Newtownabbey Borough Council
DPS-029	Minerals Products Association Northern Ireland
DPS-042	Conexpo (N.I.) Ltd
DPS-084	Ards and North Down Borough Council
DPS-092	Department for Economy (DfE)
DPS-109	Department for Infrastructure (DfI)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Armagh City, Banbridge and Craigavon Borough Council acknowledge SP13 recognises Areas of High Scenic Value around Lough Neagh and Portmore Lough that are particularly sensitive to minerals development and may benefit from further protection as an Area of Mineral Constraint at LPP. However, SP19 at page 128 states these already designated areas will be subject to review at LPP. ABC is unclear as to the level and extent of protection that will be afforded to the shared environmental at LPP. As such there is a trans-boundary issue to	The Council notes the comment. Further cross boundary engagement will be undertaken in the preparation of the Local Policies Plan (LPP) stage. It should be noted however that Lough Neagh and Portmore Lough are afforded international designation as a Special Protection Area and a Ramsar. Areas of Mineral Constraint (provided in draft BMAP) are a separate layer of constraint. If designated at LPP stage, these would 'overlay' the existing SPA/Ramsar. This means that conservation and sustainable use of these wetlands and protection of bird species utilising these sites takes precedence over potential

<p>which ABC seeks further engagement on the matter.</p>	<p>minerals development. The Council is clear, that given the level of protection afforded by the international designations, addressing specific designations including Areas of Mineral Constraint, will be carried out during the preparation of the LPP.</p>
<p>Antrim and Newtownabbey Borough Council (ANBC) recognises the dPS notes the coal and lignite reserve at Lough Neagh and around Portmore Lough as 'a strategically significant reserve albeit one that is highly unlikely to be developed in the near future'.</p> <p>ANBC points out that Policy MD4 (Operational Policy in Part 2 of the dPS) allows exploitation of valuable minerals to be considered on their own merits. ANBC is therefore unclear if the dPS will permit extraction of this reserve in the lifetime of the Plan. This differs from ANBC's position which restricts extraction of this reserve until such times when the environmental impacts of extraction are known.</p>	<p>The Council notes that only a small portion of the fossil fuel reserve is located within this Council area. It is considered Strategic Policy SP13(a) clearly sets out the Council's position by balancing the need for its exploitation against safeguarding of the environment, taking account of appropriate designations (Ramsar and SPA, see above point). The J&amp;A to which ANBC points is significant in that it identifies the reserve is unlikely to be developed in the near future. That is the Council's position, which aligns with Department for Economy (Geological Survey NI) position on extraction of lignite. The Council notes that ANBC is not dissimilar in its own LDP policy position set out in SP9.3 and corresponding operational policy DM 44.1 in that extraction is not entirely ruled out, with exceptions provided, along with a suggested 250m area where applications will be more closely scrutinised.</p> <p>The Council's policy position set out in Operational Policy MD4 Valuable Minerals aligns with the SPPS policy position (paragraph 6.157) in relation to valuable minerals. In consultation with DfE, they confirmed the following <i>"There is currently a moratorium on lignite exploration and development and consequently no application would be accepted. Whilst there are existing policy areas in place for the known lignite reserves at Crumlin and Ballymoney, there is no current information to support having a policy to protect the lignite within the Lisburn and Castlereagh City council area. Impacts on the Crumlin policy area may need to be considered given its proximity to the council boundary, should there be any future development in the area."</i></p> <p>As no definitive boundary has been drawn up by ANBC (stating this will be done at LPP stage) the Council would welcome further cross boundary cooperation on this matter as part of developing the LPP.</p>

<p>Minerals Products Association Northern Ireland and Conexpo (N.I.) Ltd believe SP13 is a balanced approach to minerals development as it considers the need to safeguard mineral resources through Mineral Safeguarding Areas. They welcome the Council's recognition of the industry's contribution to the regional economy and job provision and that the industry supports sustainable economic growth. However, it is considered the dPS does not appreciate the economic value the industry makes to the Council's economy. Considers it prudent that the dPS protects future expansion of quarries by perhaps restricting other forms of strategic development around existing sites (possibly 700m zones). There needs to be clear policy to protect sustainable future extraction.</p>	<p>The Council welcomes the endorsement of its policy in relation to Mineral Safeguarding by the overarching local industry body and one operator. Collaboration with the Council will improve its understanding of the contribution minerals makes to the local and regional economy. This can be bolstered by evidence to come forward to, and then published by, DfE. The Council considers that the LPP is the appropriate stage to consider the Council's position on Mineral Safeguarding Areas, to reinforce operational policies MD4 and MD6.</p> <p>The LPP is also the appropriate stage to consider Mineral Safeguarding Areas against protection and conservation of the natural and historic environment (operational policies MD1 Environmental Protection and MD3 Areas of Mineral Constraint.)</p> <p>The Council would welcome further engagement with the industry body on this matter and as part of developing the LPP.</p>
<p>Ards and North Down Borough Council (ANDBC) notes data gathering by DfE to enable an evidence based approach to regional mineral safeguarding and that certain sensitive areas may benefit from Areas of Mineral Constraint. However, cross boundary issues may cause impacts upon quarrying in their Borough. Reference is made to two Landscape Character Areas in LCCC's Countryside Assessment Technical Supplement (Castlereagh Plateau 95/96 and Craigtantlet 102/104), which are considered sensitive to mineral development and within which quarry development should be avoided. These LCAs are close to established quarries in ANDBC area and as such the dPS appears to be at odds with Soundness tests C4 and CE2 because no regard has been given to these operations.</p>	<p>The Council notes these comments of the neighbouring council. Going forward, cross boundary working should help establish future designations as part of the Local Policies Plan (LPP), taking account of SP13 Mineral Development, which commits the Council to balancing mineral development whilst safeguarding the environment, taking account of appropriate designations. The LCAs are not an 'allocation' (or designation) as the representation suggests, but are used to inform future designations which would be subject to consultation through the LPP, such as 'Mineral Safeguarding Areas' (see Operational Policy MD6) or 'Areas of Mineral Constraint' (see Operational Policy MD3).</p> <p>ANDBC has yet to form its own minerals policy but its preferred option on minerals, Option 31c (page 173), is a <i>'policy led approach....based on their merits, with the identification of protection areas for existing quarries to allow appropriate expansion.'</i> On page 174; <i>'proposals for mineral development assessed against a criteria based policy. The policy would take account of a number of factors such as landscape character, residential amenity, safety and impact on the built and natural environment. This approach would therefore allow for protection of the landscape</i></p>

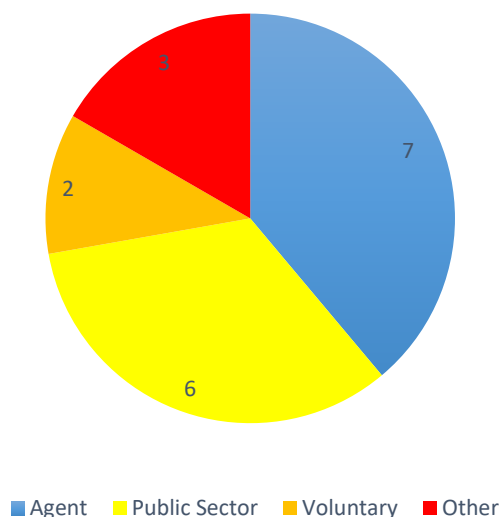
	<p><i>assets of the Borough whilst ensuring valuable economic mineral resources are available for future extraction, by identification of appropriate buffers around existing quarries to avoid prejudicing their future expansion.'</i> The Council does not consider there is conflict between Strategic Policy 13 Mineral Development and the contents of ANDBC's POP. It is presumed that any future development to quarries on the ANDBC side of this Council's boundary, will be considered in light of an LCA review carried out by that Council (ANDBC) as part of developing its draft Plan Strategy. The LCA undertaken by this Council, applies to development within the Lisburn &amp; Castlereagh City Council area only. Without ANDBC presenting robust evidence of any impacts to its existing quarrying sites it is not considered that a conflict will exist between the LDPs of the two adjoining Councils. The Council would welcome further cross boundary cooperation on this matter and as part of developing the LPP.</p>
<p>DfE welcomes the balanced approach, recognising the economic need for minerals against the need to safeguard the environment.</p>	<p>The Council welcomes the supportive comments.</p>
<p>DfI welcomes that SP13 aligns with regional policy and the strategic objectives set out in the SPPS (paragraph 6.152, page 76). DfI is unclear whether existing areas described as at risk from minerals development are already covered by existing Areas of Constraint on Mineral Development (ACMD) and/or Areas of Mineral Safeguarding. DfI acknowledges that further work will come forward on this matter at LPP.</p> <p>DfI is also unclear if the identified lignite reserve falls under operational policy MD4 (Valuable Minerals) in Part 2 of the dPS.</p>	<p>The Council notes the comments regarding alignment with regional policy. The process of identifying 'Areas of Mineral Constraint' or 'Areas of Mineral Safeguarding' will occur at LPP stage in conjunction with DfE as the statutory consultation body. Until such times the extant LDPs for the Council area remain in force, including mineral designations, and those within BMAP (pre and post adoption) remain material to any planning decisions. See Part 1 of dPS, page 16 for details of transitional arrangements and page 24 for details of existing LDPs.</p> <p>In relation to the query regarding whether Lignite is a valuable mineral and if this would fall under the consideration of operational policy MD4, the Council has consulted with DfE on this matter, and can confirm that it is recognised as a valuable mineral and therefore subject to this operational policy.</p>

## C: A VIBRANT PLACE

### Strategic Policy 14 Town Centres, Retailing and Other Uses

There were eighteen representations received in respect of Strategic Policy 14 Town Centres, Retailing and Other Uses.

### Strategic Policy 14 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-009	Department of Justice (DoJ)
DPS-010	Arqiva Ltd
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-021	Individual
DPS-036	Inaltus Limited on behalf of Drumkeen Holdings Ltd
DPS-037	Inaltus Limited on behalf of LCC Group Ltd
DPS-038	Inaltus Limited on behalf of Limo Properties Ltd
DPS-041	Belfast City Council
DPS-057	Department for Communities (DfC)
DPS-061	Fleming Mounstephen Planning on behalf of Central Craigavon Ltd
DPS-064	Invest Northern Ireland
DPS-066	One2One Planning on behalf of Forestside Acquisitions Ltd
DPS-081	Fleming Mounstephen Planning on behalf of Henderson Group
DPS-090	Dundonald Green Belt Association
DPS-094	TSA Planning on behalf of New River
DPS-099	Carryduff Regeneration Forum
DPS-109	Department for Infrastructure (DfI)
DPS-125	Company

## Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
DoJ supports the policy in relation to safety and attracting people and investment.	The Council welcomes the supportive comment.
Arqiva Ltd supports SP14.	The Council welcomes the supportive comment.
<p>NIHE strongly welcomes the policy to promote a town centre first approach in accordance with regional policy. Supportive of designation of district and local centres (retail hierarchy).</p> <p>NIHE wants specific reference in SP14 to living over the shops.</p>	<p>The Council welcomes the supportive comments.</p> <p>The Council notes the comment but does not consider this requirement necessary within Strategic Policy SP14 Town Centres, Retailing and Other Uses. Such use is permitted by Operational Policy HOU1 (page 12, Part 2 of dPS).</p>
<p>One representation from an individual states that the Retail Capacity Study found that Carryduff was predicted to be a future market of modest additions to the convenience retail offer, rather than comparison retail opportunities. This is disagreed with and the modification proposed is to increase the size of Carryduff Town Centre. Therefore SP14 is unsound.</p>	<p>The Council notes the representation but is content that the evidence provided in the Retail Capacity Study (Technical Supplement 5) is sound. The representation directly refers to SP14 Town Centres, Retailing and Other Uses however the Council considers that the modification proposed (to increase the size of Carryduff Town Centre) is a matter for consideration at LPP stage.</p>
<p>Inaltus on behalf of Drumkeen Holdings Ltd comment on the following: Forestsides District Centre is an important part of the Retail Hierarchy and will be promoted as a location to accommodate retail need as identified in the Retail Capacity Study. The robustness of the methodology used in the RCS is challenged, specifically the trading pattern of the DC and the Council's figures compared to the previous report (Collier's) for the previous plan.</p> <p>Suggest the following amendment: SP14 needs to allow the future growth of Forestsides District Centre for convenience and comparison goods and the Drumkeen Retail Park be included within the district centre this needs to be considered as a strategic issue in the DPS.</p>	<p>The Retail Capacity Study (RCS) Technical Supplement 5, states that Forestsides District Centre would support modest additions to the comparison retail offer. The RCS endorses the expansion of the District Centre boundary to include Drumkeen Retail Park. However, the Council considers that this issue is a matter for LPP stage and is not, as the representation suggests, a strategic matter that should be addressed in the dPS.</p> <p>The Council is content with the evidence provided in the RCS and is satisfied that the district centre is appropriately defined. Any alteration can be considered at LPP stage on the available evidence.</p>



<p>Inaltus on behalf of two clients comment on the following: Support the broad aspirations of SP14 where development proposals in Sprucefield are supported, provided they comply with the Key Site Requirements. Both representations have issues with the KSRs in SMU03 which are referred to in b) of SP14. No modification to SP14 is suggested within either submission.</p> <p>Concerns with the maximum floor space permitted. Maximum floorspace would result in fettering innovative and significant investment at Sprucefield. The Council's figure of 50,000 square metres relies on the now cancelled English Planning Policy Statement 6, which found out of centre shopping centres to be generally over 50,000 square metres. It does not state regional shopping centres should be up to or at a maximum of 50,000 square metres.</p>	<p>The Council notes this supportive comment. In relation to the Key Site Requirements for Sprucefield, these are addressed under Strategic Policy SMU03 Sprucefield.</p> <p>The Council notes this comment. Policy SMU03 allows up to a maximum of 50,000 sqm gross leisure and retail floor space in addition to the existing floorspace. The Council having carried out its Retail Capacity Study (Technical Supplement 5) has developed a sound rationale for this figure, and does not rely on the cancelled PPS6. Further detail is provided under Strategic Policy SMU03 Sprucefield Regional Shopping Centre.</p>
<p>Belfast City Council and Fleming Mounstephen Planning on behalf of Central Craigavon Ltd, state that SP14 policy stance is incompatible and contradictory in seeking to promote retailing and other uses in city and town centres, but also support Sprucefield due to its regional status in accordance with key site requirements (KSRs). It makes operational policy at cross purposes with itself as a result. Sprucefield is de facto a town centre and in contravention of the sequential approach.</p>	<p>The Council has identified that Sprucefield sits outwith the retail hierarchy and is dealt with under its own Strategic Policy SMU03. The Council proposes for clarity, as a focussed change, to remove criteria (b) from SP14, page 96, as follows:  <i>b) support Sprucefield Regional Shopping Centre in recognition of its regional status in accordance with key site requirements. (Ref: FC2 Focussed Changes Schedule)</i>  *See also proposed new criteria b) below under One2One Planning.</p> <p>The RDS 2035 retains Sprucefield's status as a regional out-of-town shopping centre (SFG1, page 54). To say it is operating as a 'town centre' is factually incorrect as its regional shopping role is demonstrated through specific KSRs (further detail is provided under Strategic Policy SMU03). Strategic Policy SP14 Town Centres, Retailing and Other Uses separates the retailing hierarchy including town centres from Sprucefield. Following the focussed change referred to above, the policy will not be contradictory as it has been specifically separated to facilitate growth in both locations. The sequential test</p>

	applies to the retailing hierarchy and Operational Policy (TC1) is therefore not considered incompatible or at cross purposes with Strategic Policy SP14.
DfC whilst not specifically mentioning SP14 suggests a correction is required on page 94 of chapter 4 in relation to the Laganbank Quarter Comprehensive Development Scheme, being in draft form only. Otherwise, the DPS is considered sound.	The Council welcomes the comment and acknowledges that the scheme was never formally adopted. The Council proposes to amend reference to the Laganbank Quarter Comprehensive Development Scheme (page 99) as follows: “Laganbank Quarter Comprehensive Development Scheme 2015 <i>(Draft)</i> .” (Ref: see Typo List)
Invest NI welcome support for development proposals within city and town centres; state it is important to get a balance of uses including those linked to employment such as offices. They also support the recommendations of the Office Capacity Study and the flexibility it suggests in relation to existing settlements and office potential at Forestside.	The Council welcomes the supportive comments.
One2One Planning on behalf of Forestside Acquisitions Ltd comment that the DPS and SP14 fail to recognise the value and promote the District Centre of Forestside. Unsound on two counts due to SPPS paragraph 6.277, i.e. there are no appropriate policies that make it clear which uses are permitted in the hierarchy of centres and other locations; and unclear regarding the factors that will be taken into account for decision taking.	The Council refers to the district centre under the heading ‘The Retail Hierarchy’ (page 97). The Council accepts that it would be beneficial for clarity to make reference to District and Local Centres under Strategic Policy SP14 Town Centres, Retailing and Other Uses. The Council proposes for clarity, as a minor change, to amend criteria b) of Strategic Policy SP14, page 96, as follows: <i>“b) support the role of District and Local Centres.”</i> (Ref: MC4 Minor Changes Schedule )  In relation to villages and small settlements it is considered that the text on page 98 deals sufficiently with their role and function in the hierarchy. Other matters in relation to the soundness of TC1 Town Centre, Retailing and Other Uses, and TC4 District and Local Centres, are commented upon under that specific Operational Policy.
Fleming Mounstephen on behalf of Henderson Group query the omission of local centres from SP14. Modifications proposed: SP14 should be changed to include support for local, neighbourhood	As per the comment above, the Council accepts that it would be beneficial for clarity to make reference to District and Local Centres.

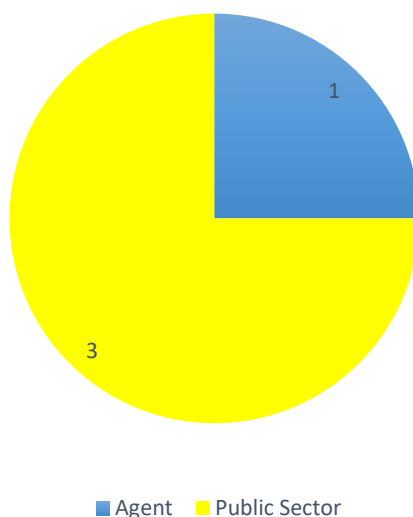
<p>retailing; the Hierarchy should be changed to include reference to local, neighbourhood retailing.</p>	<p>The Council proposes for clarity, as a minor change, to amend criteria b) of Strategic Policy SP14, page 96, as follows:  <i>“b) support the role of District and Local Centres.”</i>  (Ref: MC4 Minor Changes Schedule)</p> <p>Neighbourhood centres are a feature of the Development Management process and therefore sit outwith the retailing hierarchy. Such centres may be required as a Key Site Requirement to meet an identified local need or may be acceptable in accordance with policies HOU2 Protection of Land Zoned for Housing and TC6 Petrol Filling Stations and Roadside Service Facilities.</p>
<p>Dundonald Green Belt Association did not specifically comment on SP14 however state that the status of Dundonald (as a Town Centre) is a strategic issue and impacts on the application of SP14.</p>	<p>The Council notes the comment, however is content with its approach outlined in the dPS. The consideration of any proposed town centre boundary relating to Dundonald is a matter for the LPP stage. Should a boundary be defined to include Dundonald within the hierarchy (such as a new Town Centre) this strategic policy would apply retrospectively.</p>
<p>TSA Planning on behalf of New River provides background information; challenges facing the retailing sector; consideration of Strategic Policies SP14, SP15 and SMU03; followed by a conclusion which states they consider the dPS Strategic Policies referred to above, to be sound. Full support is given to retain Sprucefield as a Regional Shopping Centre.</p>	<p>The Council welcomes the supportive comments.</p>
<p>Carryduff Regeneration Forum did not specifically mention SP14, however direct reference is made concerning challenges around the regeneration of Carryduff Town Centre; and reiterate the strategic importance of the shopping centre and the future regeneration opportunities including primary retail frontages and public spaces. They consider the plan sound.</p>	<p>The Council notes these supportive comments and can confirm that SP14 Town Centres, Retailing and Other Uses assists in promoting regeneration of Carryduff Town Centre. Issues regarding the defining of primary retail frontages and public spaces are considered a matter for the Local Policies Plan.</p>
<p>Dfl comment that the retail hierarchy (Figure 5, page 97 of the dPS) indicates district and local centres at differing levels of the hierarchy, whereas</p>	<p>The Council notes this comment and (as stated previously) accepts that it would be beneficial for clarity to make reference to District and Local Centres.</p>

<p>Operational Policy does not reflect the differing levels.</p> <p>Consider impact of parking strategies on retailing.</p> <p>Criteria (a) takes account of the regional strategic objectives (town centre first approach). Unclear if there is a hierarchy within this policy with preference given to other centres over Sprucefield. They suggest this needs clarified as there is ambiguity. Sprucefield omitted from hierarchy.</p>	<p>The Council proposes for clarity, as a minor change, to amend criteria b) of Strategic Policy SP14, page 96, as follows:  <i>“b) support the role of District and Local Centres.”</i>  (Ref: MC4 Minor Changes Schedule)</p> <p>Operational policy for District and Local Centres is contained in TC4 which corresponds with the SPPS approach outlined in paragraph 6.276.</p> <p>The Council notes the comment however considers that the issue of car parking is best addressed jointly (with the Council, DfI and other key stakeholders) through the Local Transport Plan, to be developed as part of the LPP.</p> <p>The RDS 2035 retains the status of Sprucefield as a regional out-of-town shopping centre (SFG1, page 54). The retail hierarchy presented in Figure 5, page 97 of the dPS, is reflective of paragraph 6.281 of the SPPS which sets out the sequential approach, and which also excludes reference to any regional shopping centre. The Strategic Mixed Use Designation SMU03 addresses the role of Sprucefield as a regional shopping centre which is demonstrated through its Key Site Requirements (KSRs). Part 2 of the dPS, operational policy TC1 Town Centre, Retailing and Other Uses, footnote 21, page 56, specifically states that Sprucefield is not part of the retailing hierarchy. Therefore it is considered that as the SPPS is silent in relation to Sprucefield, the dPS sets out a clear Strategic Policy which is delivered through KSRs provided under Strategic Policy SMU03.</p>
<p>A representation received from a Company comments that SP14 is too restrictive and does not allow Carryduff the room to expand.</p>	<p>The Council is of the opinion SP14 is sound, however it is considered that the issue of an expanded Town Centre boundary designation should be addressed at the LPP stage.</p>

## Strategic Policy 15 Evening/Night-Time Economy

There were four representations received in respect of Strategic Policy 15 Evening/Night-Time Economy.

### Strategic Policy 15 by Respondent Type



#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-064	Invest NI
DPS-084	Ards and North Down Borough Council
DPS-094	TSA Planning on behalf of New River

#### Council Consideration of Issues Raised

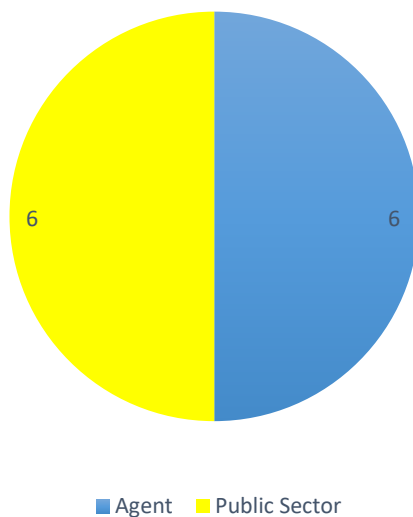
Main Issue(s) Raised	Council Consideration
<p>NIHE welcome this strategic policy; they note that an evening and night time economy can lead to regeneration of neighbouring areas through city centre living. It can also regenerate previously unused buildings.</p> <p>They make comment on any conversions to residential use providing suitable, good quality and safe homes with adequate space standards. Such residential areas (city centre) will have access to all appropriate services and open space. Environmental improvements, high quality urban design and pedestrian friendly areas will encourage city centre living.</p>	<p>The Council welcomes the supportive comment.</p> <p>The Council notes the comments made and emphasise that all the Operational Policies in particular HOU1-HOU12 inclusive, apply to developments in the city centre.</p>
<p>Invest NI links this Strategic Policy to economic growth. They concur with the comments on page 82 (Local Employment Sites) around the importance of providing for a range and type of</p>	<p>The Council welcomes the supportive comments. City and Town centres provide valuable opportunities for business and employment due to their role and function.</p>

<p>business and employment opportunity sites across the council.</p>	
<p>Ards and North Down Borough Council suggest there is tension with regard to the promotion of regeneration of city and towns, the support for towns and villages and the promotion of such places as the main location for growing the evening and night –time economy, when set against policy SMU03 Sprucefield. They require more evidence in relation to the promotion of Sprucefield as an out of town location for non-retail in competition with city and town centres. The exclusion of Sprucefield from the retail hierarchy is to the detriment of town centres.</p>	<p>The Council disagrees with the assertion made. Strategic Policy SP15 Evening/Night-time Economy, refers to encouraging the evening/night-time economy within City and Town Centres. The focus is very much on developing vibrant city and town centres, and nowhere within the policy does it refer to SMU03 Sprucefield Regional Shopping Centre.</p> <p>The potential uses at Sprucefield Regional Shopping Centre are provided as Key Site Requirements (KSRs) and as stated under SMU03 (a) would consist of a 50/50 mix of retailing and leisure/recreation uses. This mix of uses to provide a “Retail Destination” is supported further in the Retail Capacity Study, Technical Supplement 5. Given that an upper cap has been placed on both types of use, it is considered that this level of development complements and supports a growing evening/night time economy in the City and Town Centres rather than compete with it.</p>
<p>TSA Planning on behalf of New River, whilst not providing any specific comment in relation to the evening/night time economy, state that it considers Strategic Policy SP15 to be sound.</p>	<p>The Council welcomes the supportive comment.</p>

### SMU03 Sprucefield Regional Shopping Centre

There were twelve representations received in respect of Strategic Mixed Use Designation 03 Sprucefield Regional Shopping Centre.

### SMU03 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-006	Translink
DPS-007	Armagh City, Banbridge and Craigavon Borough Council
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-018	Les Ross Planning
DPS-037	Inaltus Limited on behalf of LCC Group Ltd
DPS-038	Inaltus Limited on behalf of Limo Properties Ltd
DPS-041	Belfast City Council
DPS-043	Less Ross Planning on behalf of Corbo Ltd
DPS-061	Fleming Mounstephen on behalf of Central Craigavon Ltd
DPS-084	Ards and North Down Borough Council
DPS-094	TSA on behalf of New River
DPS-109	Department for Infrastructure (Dfi)

## Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>Translink provide a general comment that Strategic Mixed Use developments identified within the strategy are in areas already experiencing high levels of traffic congestion. It suggests that extensive mitigation by way of modal shift to sustainable transport, will be necessary if these developments are to be sustainable.</p>	<p>The Council agrees with the comment provided and would point out that Key Site Requirement (e) of Strategic Mixed Use Designation SMU03 has made provision for this and it is also expanded upon in the J&amp;A. The Council would encourage further dialogue with Translink and DfI in the development of the emerging BMTP and Local Transport Plan to accompany the Local Policies Plan.</p>
<p>Armagh City, Banbridge and Craigavon Borough Council notes Sprucefield has not been defined within a network and hierarchy of retail centres.</p> <p>Due consideration has not been given to the impact on town centres within its area and seek clarification on how the Regional Shopping Centre aligns with the regional direction to secure a town centre approach for the location of future retailing.</p>	<p>The RDS 2035 retains the status of Sprucefield as a regional out-of-town shopping centre (SFG1, page 54). The retail hierarchy presented in Figure 5, page 97 of the dPS, is reflective of paragraph 6.281 of the SPPS which sets out the sequential approach that also excludes reference to any regional shopping centre. The Strategic Mixed Use Designation SMU03 addresses the role of Sprucefield as a regional shopping centre which is demonstrated through its Key Site Requirements (KSRs). Paragraph 6.283 of the SPPS refers to major retail developments and sets a Retail Impact Assessment (RIA) threshold of 1000 square metres for applications for retail or town centre developments which are not proposed in a town centre location. This is reflected in SMU03 (c). Operational policy TC1 Town Centre, Retailing and Other Uses, footnote 21, specifically states that Sprucefield is not part of the retailing hierarchy. Therefore it is considered that as the SPPS is silent in relation to Sprucefield, the dPS sets out a clear Strategic Policy which is delivered through KSRs provided under Strategic Policy SMU03.</p> <p>The aim of these KSRs are to protect the retailing centres not only within the Lisburn &amp; Castlereagh City Council area, but also other retailing centres including those of neighbouring councils.</p>
<p>NIHE supports a town centre first approach and would like the LDP to restrict further development that could harm other town centres. NIHE would like to see an agreed approach to Sprucefield with other councils as the effect of this policy will be experienced beyond the LCCC area.</p>	<p>The town centre first approach is fully retained in the retail hierarchy as set out in Figure 5, page 97 of the dPS and in Operational Policies TC1 to TC5. Likewise, the dPS sets out a clear Strategic Policy for Sprucefield which is delivered through KSRs provided under Strategic Policy SMU03. The aim of these KSRs is to protect the retailing centres, not only within the Lisburn &amp; Castlereagh City Council</p>



	<p>area but other retailing centres including those of neighbouring councils.</p> <p>Whilst consultation on the dPS is an essential feature, there is no requirement to seek agreement on the full range of issues identified, and where disagreement arises it is the role of the Independent Examination (IE) to determine if the Plan has been sound in its approach.</p>
<p>Les Ross Planning comments that new retail development at Sprucefield would harm existing retail centres and is contrary to the Regional Strategic policy which seeks to limit the growth of town centre uses in out of town locations.</p> <p>Suggest the following amendment: Policy SMU03 should be removed together with all other references to the concept of facilitating additional growth at Sprucefield.</p>	<p>The RDS 2035 retains the status of Sprucefield as a regional out-of-town shopping centre (SFG1, page 54). The retail hierarchy presented in Figure 5, page 97 of the dPS, is reflective of paragraph 6.281 of the SPPS which sets out the sequential approach that also excludes reference to any regional shopping centre. The Strategic Mixed Use Designation SMU03 addresses the role of Sprucefield as a regional shopping centre which is demonstrated through its Key Site Requirements (KSRs). Paragraph 6.283 of the SPPS refers to major retail developments and sets a Retail Impact Assessment (RIA) threshold of 1000 square metres for applications for retail or town centre developments which are not proposed in a town centre location. This is reflected in SMU03 (c). Operational policy TC1 Town Centre, Retailing and Other Uses (dPS Part 2, page 56), footnote 21, specifically states that Sprucefield is not part of the retailing hierarchy. Therefore it is considered that as the SPPS is silent in relation to Sprucefield, the dPS sets out a clear Strategic Policy which is delivered through KSRs provided under Strategic Policy SMU03. The aim of these KSRs are to protect the retailing centres not only within the Lisburn &amp; Castlereagh City Council area, but also other retailing centres including those of neighbouring councils.</p> <p>Removal of the strategic policy is considered unsound and is not substantiated by any evidence. The dPS, using the evidence provided, fairly and reasonably defines its regional role which is absent from regional policy documents.</p>
<p>Inaltus on behalf of LCC group and Limo Properties Ltd question the maximum floorspace restriction as it will limit innovative and significant investment opportunities.</p>	<p>The Council disagrees with the assertion that the floor space restriction will limit investment. Criteria (a) places a cap of up to a maximum of 25,000 square metres gross external floor space for retail uses as defined by Class A of the Planning Use Classes Order 2015.</p>

<p>They suggest for various reasons that there is no policy basis to curtail growth of Sprucefield in the manner SMU03 proposes. Suggest the following amendments: Remove reference to maximum floor space. Reword SMU03 to allow an adequate level of floorspace to reflect Sprucefield’s regional shopping centre status. In the region of 50,000 sqm of external floorspace may be appropriate, however this can be exceeded should a need be demonstrated. This level of floorspace can be used for retail and non-retail uses.</p> <p>Car showrooms will be permitted as part of the overall floorspace highlighted in criteria a). Increase the footprint of Sprucefield’s boundary to include additional lands to the south east to allow future development.</p>	<p>The overall gross floorspace at Sprucefield for both comparison and convenience is currently 44,750m<sup>2</sup> (Table 4.8 Convenience floorspace and Table 6.8 Comparison Floorspace, Technical Supplement 5 Retail Capacity Study). The Council proposes for clarity, as a minor change, to amend the figure (based on accurate figures presented in Table 4.8 and Table 6.8 of Technical Supplement 5 Retail Capacity Study) in the J&amp;A, page 104, as follows: “Sprucefield has approximately <del>65,000</del> 44,750 square metres of existing gross external retail floorspace...” (Ref: MC5 Minor Changes Schedule)</p> <p>The inclusion of the submission of a Retail Impact Assessment in accordance with regional policy under SMU03 (c) again will examine the impacts of any development proposal on the wider retail sector. This in no way restricts the potential for investment on the site and the Council would suggest that by applying the KSRs outlined, that the uses on the site are managed appropriately in recognition of its regional role.</p> <p>The Council acknowledge that no regional direction is provided on Sprucefield by the Department and the SPPS is silent in this regard. In the absence of such direction, the Council sought advice and as a result recognise it is the purpose of the Plan to define the role and function of Sprucefield as a regional shopping centre. Based on the evidence provided, the regional role is specified in SMU03 which is absent from regional policy documents. This is in accordance with its designated status in the RDS 2035.</p> <p>For the reasons outlined above, the Council would not consider the proposed modifications to be sound or evidentially based. The proposed KSRs address the future development on the site to manage it in a way which fulfils its regional role, as identified in the RDS 2035.</p>
<p>Belfast City Council express concerns relating to the future development of Sprucefield, direction should be provided by the Strategic Planning Authority. A quote from the BMAP inquiry is provided to support that view.</p>	<p>The Council acknowledge that no regional direction is provided on Sprucefield by the Department and the SPPS is silent in this regard. In the absence of such direction, the Council sought advice and as a result recognise it is the purpose of the Plan to define the role</p>

<p>The unrestricted retail role conflicts with the RDS 2035 for precautionary approach to future major retail development proposals based on the likely risk of having adverse impacts on the city centre shopping area of Belfast.</p> <p>The policy is at odds with the town centre first approach as recommended in the SPPS. It elevates the regional centre to town centre status by not including it in the retail hierarchy. It will undermine Belfast City Council's approach to its retail hierarchy given the potential to adversely impact the viability of Belfast City Centre and its network of centres.</p> <p>Belfast City Council also submitted an addendum to policy SMU03: Questioned the impact of the policy and the Scenarios which are included in the Retail Study which are the evidence for the Policy.</p>	<p>and function of Sprucefield as a regional shopping centre. Based on the evidence provided, the regional role is specified in SMU03 which is absent from regional policy documents. This is in accordance with its designated status in the RDS 2035.</p> <p>The Council disagrees with this unsubstantiated point of unrestricted retail. Strategic Policy SMU03 places a cap of up to a maximum of 25,000m<sup>2</sup> gross external floor space for retail uses as defined by Class A of the Planning Use Classes Order 2015.</p> <p>The overall gross floorspace at Sprucefield for both comparison and convenience is 44,750m<sup>2</sup> as outlined in Table 4.8 Convenience floorspace, Table 6.8 Comparison Floorspace and Technical Supplement 5 Retail Capacity Study.</p> <p>The Council proposes for clarity, as a minor change, to amend the figure (based on accurate figures presented in Table 4.8 and Table 6.8 of Technical Supplement 5 Retail Capacity Study) in the J&amp;A, page 104, as follows:  “Sprucefield has approximately <del>65,000</del> 44,750 square metres of existing gross external retail floorspace...”  (Ref: MC5 Minor Changes Schedule)</p> <p>The inclusion of a Retail Impact Assessment with any planning application in accordance with regional policy will examine the impacts of any future development proposal.</p> <p>The town centre first approach is fully retained within the retail hierarchy as set out in Figure 5, page 97 of the dPS and in Operational Policies TC1 to TC5. This is reflective of paragraph 6.281 of the SPPS which sets out the sequential approach, and which also excludes reference to any regional shopping centre.</p> <p>The Strategic Mixed Use Designation SMU03 addresses the role of Sprucefield as a regional shopping centre which is demonstrated through its Key Site Requirements (KSRs). Paragraph 6.283 of the SPPS refers to major retail developments and sets a Retail Impact Assessment (RIA) threshold of 1000m<sup>2</sup> for applications for retail or town centre</p>
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<p>Like for like comparisons with Sprucefield are too simplistic as bench-marks going forward.</p>	<p>developments which are not proposed in a town centre location. This is reflected in SMU03 KSR (c). Operational policy TC1 Town Centre, Retailing and Other Uses, footnote 21, specifically states that Sprucefield is not part of the retailing hierarchy. Therefore it is considered that as the SPPS is silent in relation to Sprucefield, the dPS sets out a clear Strategic Policy which is delivered through KSRs of Strategic Policy SMU03.</p> <p>The aim of these KSRs are to protect the retailing centres not only within the Council area, and other retailing centres including those located in neighbouring councils.</p> <p>The Council is content the figures, as presented within the Retail Capacity Study are accurate and reflect the level of anticipated growth for Sprucefield under Scenario 2 (outlined on page 30-32, Technical Supplement 5).</p> <p>The growth anticipated at Sprucefield is not considered to be unreasonable, given the regional catchment it serves. The population of Northern Ireland was recorded as 1.882 million in 2018 (NISRA).</p> <p>Applicants must provide a retail impact assessment if the proposal exceeds 1000m<sup>2</sup>, in accordance with the SPPS. This is considered to be a sound approach for dealing with any application and clearly determines the level of potential impact.</p> <p>The Council accepts that not all the comparison examples cited in its study provide a like-for-like comparison, but they are a useful indicator that out of town shopping centres, significantly greater in size than Sprucefield, are common in other parts of the UK. The example in Table 2 which is not referred to by BCC, i.e. Braehead, is not dissimilar to Sprucefield scenario. It is located five miles from Glasgow city centre (population of approx. 600,000 comparable to the 2011 Census figure for the Belfast Metropolitan Area) and offering a 1.2 million population catchment in greater Glasgow.<sup>2</sup> This is comparable to the population catchment</p>
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<sup>2</sup> Source Intugroup.co.uk

<p>Belfast City Council question the figures in the Retail study on floor space.</p>	<p>source indicated in the representation for Belfast of 1.25 million. However, the facility at Braehead offers 105,000m<sup>2</sup> floorspace, compared to the much more modestly aligned total potential of 69,750m<sup>2</sup> retail floorspace at Sprucefield. The Council remains of the opinion that the policy requirements stipulated under SMU03 and the cap of 25,000m<sup>2</sup> gross retail floor space, prevents any negative impacts on adjoining centres in the catchment area as they will be subject to thorough assessment at the planning application stage.</p> <p>The Council agrees with BCC comment under Addendum point (c) that the figure on page 104 of the dPS is incorrect. The reference to 65,000m<sup>2</sup> (which stemmed from the Department for Infrastructure’s GL Hearn report for the SPPS on retailing) will be amended to reflect this more accurate figure. The Council proposes for clarity, as a minor change, to amend the figure (based on accurate figures presented in Table 4.8 and Table 6.8 of Technical Supplement 5 Retail Capacity Study) in the J&amp;A, page 104, as follows:  “Sprucefield has approximately <del>65,000</del> 44,750 square metres of existing gross external retail floorspace...”  (Ref: MC5 Minor Changes Schedule)</p>
<p>Belfast City Council questions the KSR in relation to minimum unit size and restriction on the type of good sold (bulky durable goods only).</p>	<p>The Council confirms that when added to the existing floorspace of 44,750m<sup>2</sup>, the total potential of retailing floor space at Sprucefield Regional Shopping Centre, is 69,750m<sup>2</sup>. The impacts of any development at Sprucefield will be assessed through the submission of a retail impact assessment, see SMU03 (b) and applies to all development regardless of its scale or size.</p> <p>In addition, the ‘needs assessment’ in Policy SMU03 (c) requires the applicant to demonstrate that there is a need for further development in this designated area, where proposals exceed 1000m<sup>2</sup> gross external area which is not being met by existing facilities: as a general rule, such need must be demonstrated if permission for the development is to be granted.</p>

	<p><u>Minimum floorspace requirement and preclusion of subdivision of units:</u> The PAC were sceptical of the rationale for the 3,000m<sup>2</sup> minimum size floor space for units. The public inquiry report into draft BMAP paragraph 6.4.8 states:</p> <p><i>“The plan states a minimum unit size of 6000m<sup>2</sup>. The Department amended this to 3000m<sup>2</sup> in their evidence. The justification for this limit was not explained other than to distinguish Sprucefield from other out of town shopping centres. It is clear that this distinction arises from its role as a RSC. This restriction was not suggested in the recommendations of the Retail Study or Update. The point was made that there are very few operators who require this larger unit size. The main such operator is IKEA and they have built their Northern Ireland store at Holywood Exchange. We consider that to introduce the floorspace restriction proposed in the light of no discernable demand would not enhance the centre nor allow it to fulfil its stated potential as a regional centre.”</i></p> <p>The Council concurs with the view of the PAC. In defining the role of Sprucefield, and as demonstrated through the supporting Retail Capacity Study, floor space is restricted to 25,000m<sup>2</sup> retailing and 25,000m<sup>2</sup> leisure use. It is not considered necessary to define the floor space as there is no justifiable reason to do so. The KSRs and requirement of a Retail Impact Assessment (RIA) will assess each individual proposals impact on the catchment area.</p> <p>The PAC considered that a restriction to bulky goods would not enhance Sprucefield’s role as a regional centre. The public inquiry report into draft BMAP set out clearly that the restriction on the type of goods to be sold is not a matter to be considered in the Plan. Paragraph 6.4.6 of the Public Local Inquiry Report on the Strategic Plan Framework states:</p> <p><i>“The recommendation of the Retail Study was that Sprucefield should be allowed to grow in floorspace terms to at least 75,000m<sup>2</sup> and that this should be restricted to the retailing of bulky comparison goods only. The Department has adopted this recommendation. The bulky goods restriction relates to a fundamental characteristic of the centre to which there is no</i></p>
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	<p><i>reference in either PPS5 or draft PPS 5. Such a restriction on the type of retailing to be permitted in one of the three RSCs is clearly a regional matter and should have been made explicit in regional policy (i.e. draft PPS 5). In the absence of any such reference in regional policy, the restrictions now proposed through BMAP would have the effect of fundamentally changing the nature of the designation and are not appropriate for introduction through the development plan process.”</i></p> <p>Furthermore, paragraph 6.4.8 states:  <i>“The requirement for bulky goods retailing seems to be a measure to protect town centres. Yet proposals would have to meet the tests in paragraph 39 of PPS 5, in any event. This requirement is advanced at a time when future policy as set out in draft PPS5 appears to moving away from separate consideration of retail warehouses and bulky goods retailing. It is difficult to see how more of this type of retailing will enhance Sprucefield as a regional centre.”</i></p> <p>The Council points out that the total potential of Sprucefield identified through the dPS is 69,750m<sup>2</sup>, which is more than 5,000m<sup>2</sup> below the Department’s previous adopted position. The Council further considers that in light of the above, it is inappropriate for the Plan to place a restriction on the selling of bulky goods only, and there is no requirement in the SPPS for such restrictions in any Regional Shopping Centre. The Retail Capacity Study identifies that goods should be ‘largely comparison’, as there is a restricted market for convenience. This criteria is considered to be sound in relation to the type of goods to be provided at Sprucefield. Comparison goods are defined in the Glossary of Part 2 Operational Policies.</p> <p>The dPS, in identifying the role of Sprucefield as a regional shopping centre, supports a mix of retailing and leisure uses, the overall quantum of additional retailing being confined to 25,000m<sup>2</sup>.</p>
<p>Les Ross Planning on behalf of Corbo Ltd comments they have an issue with Key Site Requirements and should be amended as follows;</p>	<p>The PAC considered that a restriction to bulky goods would not enhance Sprucefield’s role as a regional centre. The public inquiry report into draft BMAP set out clearly that the restriction</p>

<p>Key site requirements (a) and (b) should be removed.</p> <p>The reason for excluding KSR (a) is that they do not consider Sprucefield to function as a regional shopping centre.</p> <p>The reason for excluding (b) is due to the comments from the public inquiry into BMAP and the restriction on the sale of comparison goods to bulky comparison goods only.</p>	<p>on the type of goods to be sold is not a matter to be considered in the Plan. Paragraph 6.4.6 of the Public Local Inquiry Report on the Strategic Plan Framework states:</p> <p><i>“The recommendation of the Retail Study was that Sprucefield should be allowed to grow in floorspace terms to at least 75,000m<sup>2</sup> and that this should be restricted to the retailing of bulky comparison goods only. The Department has adopted this recommendation. The bulky goods restriction relates to a fundamental characteristic of the centre to which there is no reference in either PPS5 or draft PPS 5. Such a restriction on the type of retailing to be permitted in one of the three RSCs is clearly a regional matter and should have been made explicit in regional policy (i.e. draft PPS 5). In the absence of any such reference in regional policy, the restrictions now proposed through BMAP would have the effect of fundamentally changing the nature of the designation and are not appropriate for introduction through the development plan process.”</i></p> <p>Furthermore, paragraph 6.4.8 states:</p> <p><i>“The requirement for bulky goods retailing seems to be a measure to protect town centres. Yet proposals would have to meet the tests in paragraph 39 of PPS 5, in any event. This requirement is advanced at a time when future policy as set out in draft PPS5 appears to moving away from separate consideration of retail warehouses and bulky goods retailing. It is difficult to see how more of this type of retailing will enhance Sprucefield as a regional centre.”</i></p> <p>The Council would point out that the total potential of Sprucefield identified through the dPS is 69,750m<sup>2</sup>, which is more than 5,000m<sup>2</sup> below the Department’s previous adopted position. The Council further considers that in light of the above, it is inappropriate for the Plan to place a restriction on the selling of bulky goods only. The Retail Capacity Study identifies that goods should be ‘largely comparison’ as there is a restricted market for convenience. This criteria is considered to be sound in relation to the type of goods to be provided at Sprucefield. Comparison goods are defined in the Glossary of Part 2 Operational Policies.</p>
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	<p>Technical Supplement 5, Retail Capacity Study confirms that Sprucefield is currently operating as a Regional Shopping Centre – this is different to the position established some 15 years ago in the development of the previous Development Plan, BMAP. The purpose of KSR’s is to place a suitable cap on development which enables Sprucefield regional shopping centre to grow in a way that defines its role and does not negatively impact on other retailing centres within the catchment area. This policy ensures Sprucefield retains its function as a regional shopping centre in the future.</p> <p>The dPS, in identifying the role of Sprucefield as a regional shopping centre, supports a mix of retailing and leisure uses, the overall quantum of retailing being confined to an additional 25,000m<sup>2</sup>.</p> <p>The Council does not agree with the removal of the two KSRs for the reasons provided.</p>
<p>Fleming Mounstephen Planning on behalf of Central Craigavon Ltd comment that the Plan Strategy should not state the status and role of Sprucefield (not matters for the Local Development Plan) but to be decided at a regional level.</p> <p>No floorspace allocations for Sprucefield should be allocated, and the dPS should not designate the Area of potential Development.</p> <p>Restriction should be for sale of bulky durable goods only with a minimum unit size of 1,000m<sup>2</sup> gross floorspace.</p>	<p>The Council acknowledge that no regional direction is provided on Sprucefield by the Department and the SPPS is silent in this regard. In the absence of such direction, the Council sought advice and as a result recognise it is the purpose of the Plan to define the role and function of Sprucefield as a regional shopping centre. Based on the evidence provided, the regional role is specified in SMU03 which is absent from regional policy documents. This is in accordance with its designated status in the RDS 2035.</p> <p>The dPS, in identifying the role of Sprucefield as a regional shopping centre, supports a mix of retailing and leisure uses, the overall quantum of retailing being confined to an additional 25,000 square metres.</p> <p>Technical Supplement 5, Retail Capacity Study confirms that Sprucefield is currently operating as a Regional Shopping Centre – this is different to the position established some 15 years ago in the development of the previous Development Plan, BMAP. The purpose of KSR’s is to place a suitable cap on development which enables Sprucefield regional shopping centre to grow in a way that defines its role and does not negatively impact on other retailing centres within the catchment area. This policy ensures</p>

	<p>Sprucefield retains its function as a regional shopping centre in the future.</p> <p><u>Bulky Goods:</u> The public inquiry report into draft BMAP set out clearly that the restriction on the type of goods to be sold is not a matter to be considered in the Plan. Paragraph 6.4.6 of the Public Local Inquiry Report on the Strategic Plan Framework states:  <i>“The recommendation of the Retail Study was that Sprucefield should be allowed to grow in floorspace terms to at least 75,000 m<sup>2</sup> and that this should be restricted to the retailing of bulky comparison goods only. The Department has adopted this recommendation. The bulky goods restriction relates to a fundamental characteristic of the centre to which there is no reference in either PPS5 or draft PPS 5. Such a restriction on the type of retailing to be permitted in one of the three RSCs is clearly a regional matter and should have been made explicit in regional policy (i.e. draft PPS 5). In the absence of any such reference in regional policy, the restrictions now proposed through BMAP would have the effect of fundamentally changing the nature of the designation and are not appropriate for introduction through the development plan process.”</i></p> <p>Furthermore, paragraph 6.4.8 states:  <i>“The requirement for bulky goods retailing seems to be a measure to protect town centres. Yet proposals would have to meet the tests in paragraph 39 of PPS 5, in any event. This requirement is advanced at a time when future policy as set out in draft PPS5 appears to moving away from separate consideration of retail warehouses and bulky goods retailing. It is difficult to see how more of this type of retailing will enhance Sprucefield as a regional centre.”</i></p> <p>The Council points out that the total potential of Sprucefield identified through the dPS is 69750m<sup>2</sup>, which is approximately 5000m<sup>2</sup> below the Department’s previous adopted position. The Council further considers that in light of the above, it is inappropriate for the Plan to place a restriction on the selling of bulky goods only, and there is no requirement in the SPPS for such restrictions in any Regional Shopping Centre. The Retail Capacity Study</p>
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<p>Key Site Requirement should include significant new infrastructure provision.</p>	<p>identifies that goods should be largely comparison, as there is a restricted market for convenience. This criteria is considered sufficiently robust in relation to the types of goods to be sold at Sprucefield. Comparison goods are defined in the Glossary of Part 2 Operational Policies.</p> <p>The dPS, in identifying the role of Sprucefield as a regional shopping centre, supports a mix of retailing and leisure uses, the overall quantum of retailing being confined to an additional 25,000m<sup>2</sup>.</p> <p>Key Site Requirement (e) relates to transport provision which any future development proposal must comply with. The issue of infrastructure provision will be further addressed through the emerging BMTP or the Local Transport Plan to be provided by DfI as part of the Local Policies Plan.</p>
<p>Ards and North Down Borough Council advise it is unclear in relation to the sequential approach to retailing, town centre first and the need to include further land at Sprucefield.</p>	<p>The town centre first approach is fully retained within the retail hierarchy as set out in Figure 5, page 97 of the dPS and in Operational Policies TC1 to TC5. This is reflective of paragraph 6.281 of the SPPS which sets out the sequential approach, and which also excludes reference to any regional shopping centre.</p> <p>The Strategic Mixed Use Designation SMU03 addresses the role of Sprucefield as a regional shopping centre which is demonstrated through its Key Site Requirements (KSRs). Paragraph 6.283 of the SPPS refers to major retail developments and sets a Retail Impact Assessment (RIA) threshold of 1000 square metres for applications for retail or town centre developments which are not proposed in a town centre location. This is reflected in SMU03 (c). Operational policy TC1 Town Centre, Retailing and Other Uses, footnote 21, specifically states that Sprucefield is not part of the retailing hierarchy. Therefore it is considered that as the SPPS is silent in relation to Sprucefield, the dPS sets out a clear Strategic Policy which is delivered through KSRs provided under Strategic Policy SMU03.</p> <p>The aim of these KSRs are to protect the retailing centres not only within the Council area, but also other retailing centres including those located in neighbouring councils.</p>

	Therefore the Council is satisfied that regional policy of the SPPS in respect of the sequential approach and the RDS regional guidance relating to Sprucefield have been complied with.
TSA on behalf of New River: Supports the policy and considers it sound.	The Council welcomes the supportive comments.
DfI notes Sprucefield Regional Shopping centre is omitted from the retail hierarchy.	<p>The RDS 2035 retains the status of Sprucefield as a regional out-of-town shopping centre. The retail hierarchy presented in Figure 5, page 97 of the dPS, is reflective of paragraph 6.281 of the SPPS which sets out the sequential approach, and which also excludes reference to any regional shopping centre.</p> <p>The Strategic Mixed Use Designation SMU03 addresses the role of Sprucefield as a regional shopping centre, in accordance with its status afforded by the RDS 2035, which is demonstrated through its Key Site Requirements (KSRs). Paragraph 6.283 of the SPPS refers to major retail developments and sets a Retail Impact Assessment (RIA) threshold of 1000 square metres for applications for retail or town centre developments which are not proposed in a town centre location. This is reflected in SMU03 (c). Operational policy TC1 Town Centre, Retailing and Other Uses, footnote 21, specifically states that Sprucefield is not part of the retailing hierarchy. Therefore it is considered that as the SPPS is silent in relation to Sprucefield, the dPS sets out a clear Strategic Policy which is delivered through KSRs provided under Strategic Policy SMU03.</p> <p>The aim of these KSRs are to protect the retailing centres not only within the Council area, but also other retailing centres including those located in neighbouring councils.</p>
The key site requirements for SMU03 proposes a relaxation of the current planning policy context for development proposals at Sprucefield contained in draft BMAP. At present these include a restriction on the type of goods to be sold, a minimum floorspace requirement and a condition precluding the subdivision of units under the floorspace requirement. These policy criteria are underpinned by the strategic policy of the SPPS.	<p>The Department did not accept the advice of the PAC in the former BMAP public inquiry report which stated <i>“It is not the function of the development plan to specify the difference between different regional centres [Belfast City Centre, Derry/Londonderry and Sprucefield specified in the RDS] - that is a matter for regional policy to elucidate.”</i></p> <p>The Council acknowledge that no regional direction is provided on Sprucefield by the Department and the SPPS is silent in this</p>

	<p>regard. In the absence of such direction, the Council sought advice and as a result recognise it is the purpose of the Plan to define the role and function of Sprucefield as a regional shopping centre. Based on the evidence provided, the regional role is specified in SMU03 which is absent from regional policy documents. This is in accordance with its designated status in the RDS 2035.</p> <p>The dPS, in identifying the role of Sprucefield as a regional shopping centre, supports a mix of retailing and leisure uses, the overall quantum of retailing being confined to an additional 25,000m<sup>2</sup>.</p> <p><u>Bulky Goods:</u> The public inquiry report into draft BMAP set out clearly that the restriction on the type of goods to be sold is not a matter to be considered in the Plan. Paragraph 6.4.6 of the Public Local Inquiry Report on the Strategic Plan Framework states:</p> <p><i>“The recommendation of the Retail Study was that Sprucefield should be allowed to grow in floorspace terms to at least 75,000 m<sup>2</sup> and that this should be restricted to the retailing of bulky comparison goods only. The Department has adopted this recommendation. The bulky goods restriction relates to a fundamental characteristic of the centre to which there is no reference in either PPS5 or draft PPS 5. Such a restriction on the type of retailing to be permitted in one of the three RSCs is clearly a regional matter and should have been made explicit in regional policy (i.e. draft PPS 5). In the absence of any such reference in regional policy, the restrictions now proposed through BMAP would have the effect of fundamentally changing the nature of the designation and are not appropriate for introduction through the development plan process.”</i></p> <p>Furthermore, paragraph 6.4.8 states:</p> <p><i>“The requirement for bulky goods retailing seems to be a measure to protect town centres. Yet proposals would have to meet the tests in paragraph 39 of PPS 5, in any event. This requirement is advanced at a time when future policy as set out in draft PPS5 appears to moving away from separate consideration of retail warehouses and bulky goods retailing. It is difficult to see how more of this type of</i></p>
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*retailing will enhance Sprucefield as a regional centre.”*

The Council points out that the total potential of Sprucefield identified through the dPS is 69,750m<sup>2</sup>, which is more than 5,000m<sup>2</sup> below the Department’s previous adopted position. The Council further considers that in light of the above, it is inappropriate for the Plan to place a restriction on the selling of bulky goods only, and there is no requirement within the SPPS for such a restriction. The Retail Capacity Study identifies that goods should be largely comparison, as there is a restricted market for convenience. This criteria is considered sufficiently robust in relation to the types of goods to be sold at Sprucefield. Comparison goods are defined in the Glossary of Part 2 Operational Policies.

Minimum floorspace requirement and preclusion of subdivision of units: The PAC were sceptical of the rationale for the 3,000m<sup>2</sup> minimum size floor space for units. The public inquiry report into draft BMAP paragraph 6.4.8 states:

*“The plan states a minimum unit size of 6000 m<sup>2</sup>. The Department amended this to 3000 m<sup>2</sup> in their evidence. The justification for this size limit was not explained other than to distinguish Sprucefield from other out of town shopping centres. It is clear that this distinction arises from its role as a RSC. This restriction was not suggested in the recommendations of the Retail Study or Update. The point was made that there are very few operators who require this larger unit size. The main such operator is IKEA and they have built their Northern Ireland store at Holywood Exchange. We consider that to introduce the floorspace restriction proposed in the light of no discernable demand would not enhance the centre nor allow it to fulfil its stated potential as a regional centre.”*

The Council concurs with the view of the PAC. In defining the role of Sprucefield, and as demonstrated through the supporting Retail Capacity Study, floor space is restricted up to an additional 25,000m<sup>2</sup> retailing and 25,000m<sup>2</sup> leisure use. It is not considered necessary to define the floor space as there is no justifiable

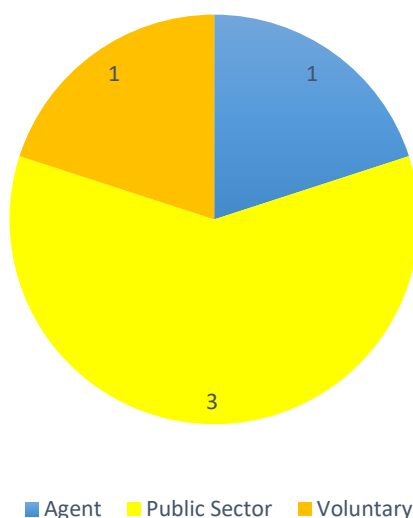
	reason to do so. The KSRs and requirement of an RIA will assess each individual proposals impact on its catchment area.
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## **D: AN ATTRACTIVE PLACE**

### **Strategic Policy 16 Tourism**

There were five representations received in respect of Strategic Policy 16 Tourism.

### Strategic Policy 16 by Respondent Type



### **Respondents**

Reference Number	Respondent
DPS-008	Tourism NI
DPS-039	Inaltus Limited on behalf of O'Kane Property Ltd
DPS-092	Department for the Economy (DfE)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (DfI)

### **Council Consideration of Issues Raised**

Main Issue(s) Raised	Council Consideration
Tourism NI and DfE find the dPS establishes a clear aspiration to grow the visitor economy through a sustainable approach balancing the needs of visitors/tourism industry with careful protection of the built and natural environment; existing city and town hubs and the rural settlements provide the best option for growth of sustainable tourism accommodation; settlements typically offer existing services and facilities that visitors enjoy and facilitate a gateway to natural assets; recognition that there is a need for additional hotel accommodation in the district.	The Council welcomes the supportive comments.
DfI considers that SP16 supports the aims and objectives of the SPPS, the Council's own	The Council notes the comments. With regard to the Operational Policies of Part 2 supporting



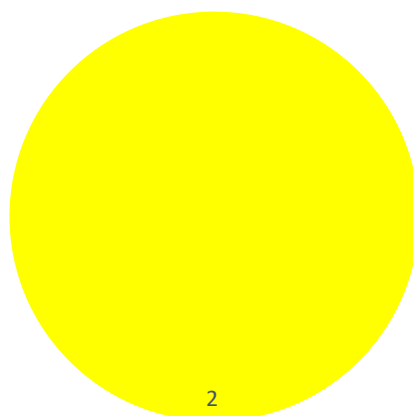
<p>Tourism Strategy and the Operational Policies contained in Part 2 of the dPS. Council should ensure the Operational Policies in Part 2 support SP16.</p>	<p>Strategic Policy SP16 Tourism, the Council is content that the full suite of policies will support tourism development that is sustainable both in terms of environmental protection and meeting economic aspirations.</p>
<p>Inaltus makes a specific site representation for the redevelopment of existing industrial land for mixed use (industrial and residential) and considers SP16 (like SP12 above) endorses this. Housing would support tourism growth in the LVRP by providing for local employment close to tourist accommodation. Inaltus considers the dPS is not flexible enough to encourage such proposals and the answer is to expand the settlement limit of Hillhall.</p>	<p>The Council, while noting the comments, does not agree that Strategic Policy SP16 Tourism endorses mixed use redevelopment of an existing industrial site to support tourism. Neither the wording of the policy nor its J&amp;A suggests such. Justification for such a redevelopment, and the appropriate mechanism for doing so, would be at the Local Policies Plan stage or conversely through the submission of a planning application, assessed against all relevant policies including Operational Policies set out in Part 2 of the dPS. The issue of an expansion to the Hillhall settlement development limits for the purposes of housing, is more relevant to Strategic Policy SP08 Housing in Settlements.</p>
<p>RSPB NI comments on tourism benefits derived from enjoyment of the natural environment, but human activity can, in instances, have a negative impact on biodiversity. The LDP must provide strong policy protection for those areas of natural and semi-natural habitat which lack formal designation (e.g. areas of wet grass land, or blanket bog). Issues of potential disturbance to key birds from recreational tourism should also be considered, for example: SPA /Ramsar/ASSI designations at Loughs Neagh and Beg including Portmore Lough. In Mid Ulster, RSPB NI proposed the identification of a buffer zone to the Lough Neagh/Beg SPA/ASSI and an area of 1km has been identified from the edge of the protected area in order to allow nature a space to 'breathe'. Given that the LCCC plan area includes part of the Lough Neagh shoreline and Portmore Lough, it is recommended that a similar buffer is extended within the LCCC boundary. A buffer area serves to highlight the special consideration required to be given to future development in this area to avoid future potential impacts either alone or in combination, while giving nature an opportunity 'to breathe' at a landscape scale beyond the precise delineated boundaries of the site designation.</p>	<p>The Council notes the suggestion, however the designation of the Lough Neagh/Lough Beg SPA/Ramsar/ASSI is a central government function, and the Council acknowledges the international/national level of protection already afforded to it. The Ramsar site is already supplemented by areas around Portmore that include sites for local nature conservation (SLNCIs). The Council does not have statutory authority to further extend the Ramsar or give further site specific protection, other than the provision of local designations such as a Local Landscape Policy Area (LLPA), SLNCI, or local nature reserve. These may be subject to consideration at the LPP stage of the Plan process.</p> <p>The Council is content that Strategic Policy SP16 Tourism is strong enough to protect these designated sites, requiring tourism development to be sustainable and have regard to the environment. This is further bolstered by the suite of Operational Policies in Part 2 of the dPS, particularly the natural heritage policies (NH1 to NH6 on pages 85 to 88). These are further significantly supplemented by the general criteria policy T0U7 (pages 66 and 67) that requires tourism development to not adversely affect features of the natural (or historic) environment. The Council is content its policies are sufficiently robust to protect</p>

	national/international designated sites and, should it follow from IE, further protection is necessary this can be considered through the next stage of the LDP process, the LPP.
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## Strategic Policy 17 Open Space, Sport and Outdoor Recreation

There were two representations received in respect of Strategic Policy 17 Open Space, Sport and Outdoor Recreation.

### Strategic Policy 17 by Respondent Type



■ Public Sector

#### Respondents Received

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-041	Belfast City Council

#### Council Consideration of Issues Raised

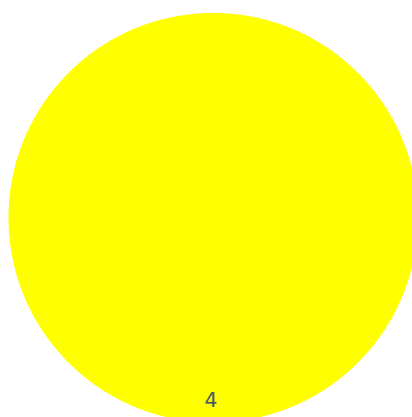
Main Issue(s) Raised	Council Consideration
NIHE whilst supporting the policy, believe there is an opportunity for the Council to develop further open space strategies.	The Council welcomes the supportive comments and would point out that the Council's 'draft Open Space Strategy' has been developed separately and is used to inform the LDP policies on Open Space. Further open space provision can be secured through Key Site Requirements (KSRs) attached to zonings at LPP stage, and those strategic sites indicated in Part 1 of the dPS.
Belfast City Council whilst not referring to this specific policy, welcomes the approach to strategic and community greenways (carried forward from the existing development plan). However, BCC considers further work is required regarding cross boundary greenways at LPP stage.	The Council welcomes the supportive comments and can confirm that further ongoing work will be required for cross boundary connectivity at LPP stage, particularly in relation to the opportunities provided through strategic and community greenways.

## **E: A GREEN PLACE**

### **Strategic Policy 18 Protecting and Enhancing the Historic Environment and Archaeological Remains**

There were four representations received in respect of Strategic Policy 18 Protecting and Enhancing the Historic Environment and Archaeological Remains.

### Strategic Policy 18 by Respondent Type



■ Public Sector

#### **Respondents**

<b>Reference Number</b>	<b>Respondent</b>
DPS-007	Armagh City, Banbridge and Craigavon Borough Council
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-030	Department for Communities - Historic Environment Division (HED)
DPS-041	Belfast City Council

#### **Council Consideration of Issues Raised**

<b>Main Issue(s) Raised</b>	<b>Council Consideration</b>
Armagh City, Banbridge and Craigavon Borough Council notes that Areas of Significant Archaeological Interest are not referred to in the policy and question the omission of the Giants Ring ASAI.	SP18 point (b) references archaeological remains and areas of archaeological potential. The J&A to SP18 defines archaeological remains as including Areas of Significant Archaeological Interest (ASAI). The Council would point out that the Giants Ring ASAI falls within the Belfast City Council area.
NIHE supports SP18 in particular new development proposals should be of a high quality design in order to promote the Council area as an attractive place to live, work and invest.	The Council welcomes the supportive comment.
HED note ordering of points (a) and (b) in the policy text should be reversed to achieve alignment with the hierarchical approach of the	The Council notes the comment in relation to the hierarchical approach, however would point out that the sequencing of criteria (a)

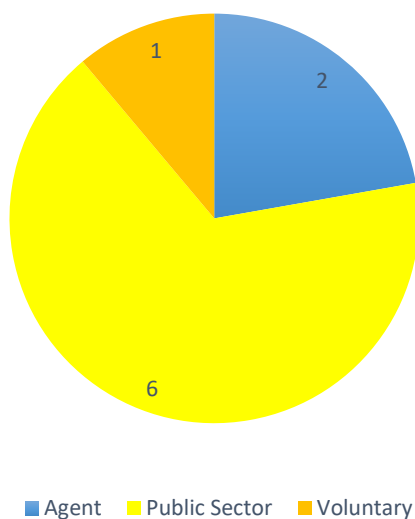
<p>SPPS. The accompanying amplification text should be reflective of this.</p> <p>The term “scheduled monument” not scheduled site be used for accuracy and consistency.</p> <p>Paragraph on archaeological remains contains inaccurate wording. They suggest wording to be amended to include the following  <i>“Archaeological remains...and sites that would merit scheduling. Archaeological remains of local importance include other sites recorded on the Sites and Monuments Record, the Industrial Heritage Record and the Defence Heritage Record.”</i></p> <p>Paragraph on Areas of Archaeological Potential needs expanded to give flexibility of inclusion of new sites.</p> <p>Footnote 51 page 125 should be amended removing reference to Historic Parks and Demesnes and Areas of Significant Archaeological Interest (ASAI)</p>	<p>through to (c) does not afford a priority or ranking. Therefore it considers that the reordering of text in the policy and the J&amp;A to be unnecessary in terms of the soundness of the Plan.</p> <p>The Council proposes for clarity, as a minor change, to amend the J&amp;A, page 125, as follows:  <i>“Listed Buildings/Scheduled <del>Sites</del> <b>Monuments</b>”</i>  and the corresponding footnote 51.  (Ref: MC6A Minor Changes Schedule)</p> <p>The Council proposes for clarity, as a minor change, to amend the J&amp;A, page 125, as follows:  <i>“Archaeological remains of regional importance include monuments in State Care, scheduled monuments and Areas of Significant Archaeological Interest (ASAI) <del>Such sites benefit from statutory protection and sites that would merit scheduling. Archaeological remains of local importance include other sites recorded on the Sites and Monuments Record, the Industrial Heritage Record and the Defence Heritage Record.”</del></i>  (Ref: MC6B Minor Changes Schedule)</p> <p>The Council proposes for clarity, as a minor change, to amend the J&amp;A, page 125, as follows:  <i>“There are <b>presently</b> six areas of Archaeological Potential in Dundonald, Dromara, Hillsborough, Lisburn, Drumbo and Glenavy, <del>which are also afforded protection through this Local Development Plan</del> and more may be identified at Local Policies Stage.”</i>  (Ref: MC6C Minor Changes Schedule)</p> <p>The Council notes the comment and acknowledges HED may identify these as opposed to designating them. The Council acknowledges this point is not addressed and will amend as a typo error to read ‘designated <i>or identified</i> by Historic Environment Division’  (Ref: see Typo List)</p>
<p>Belfast City Council welcomes the approach to protecting and enhancing the Historic Environment through designation of heritage assets. Discussions and further co-ordination will be required for cross boundary matters</p>	<p>The Council welcomes these supportive comments and acknowledge that further engagement on cross boundary issues are required as part of the LPP.</p>

such as reviewing existing and future designation as part of the Local Policies Plan.	
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## Strategic Policy 19 Protecting and Enhancing Natural Heritage

There were nine representations received in respect of Strategic Policy 19 Protecting and Enhancing the Natural Environment.

### Strategic Policy 19 by Respondent Type



### Respondents

Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-034	Inaltus Limited on behalf of Lisburn North Development Consortium
DPS-040	Inaltus Limited on behalf of Individual
DPS-041	Belfast City Council
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-084	Ards and North Down Borough Council
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (DfI)

## Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>Armagh City, Banbridge and Craigavon Borough Council notes the carrying forward of existing natural heritage designations and that further work is planned, reviewing these designations as part of the Local Policies Plan. Seek clarification however on the scope and purpose of such a review and question whether individual policies, site boundaries, or new designations form part of this review.</p>	<p>The Council notes the comment. The scope of any review at LPP stage will be wide ranging and if required amendments may be considered. Such amendments at LPP stage will be subject to consultation with neighbouring councils.</p>
<p>NIHE welcomes this policy in accordance with regional and local policy. Supporting the recognition of trees and woodland for green and blue infrastructure networks. They would welcome a detailed development management policy in relation to trees and development.</p>	<p>The Council welcomes the supportive comments. In relation to a specific operational policy for trees, the Council is content that there is sufficient protection afforded for trees under the existing legislative and policy provisions. However it is acknowledged that further guidance may be required at some point in the future on this matter to accompany the LPP (or form a part thereof).</p>
<p>Inaltus on behalf of Lisburn North Development Consortium and an Individual noted that landscape wedges have been carried over from draft BMAP. They object to their lands being included within the already designated landscape wedge. They reserve the right to comment further on this matter.</p>	<p>The Council is content that the current landscape wedges are retained under the dPS. These will be subject to further assessment /review as part of the LPP. Any further comment can be submitted at that stage of the process.</p>
<p>Belfast City Council welcomes the approach to protecting and enhancing the natural environment through designation of the assets. Discussions and further co-ordination will be required for cross boundary matters such as reviewing existing and future designation as part of the Local Policies Plan.</p>	<p>The Council welcomes the supportive comments and acknowledges that further engagement on cross boundary issues is required as part of the LPP.</p>
<p>NIEA welcomes the strategy.</p> <p>They note there is no specific operational policy on trees and suggest this could be beneficial.</p> <p>Due to the absence of Local Nature Reserves and Wildlife Refuges in the council area, this is the time to consider these and formulate an operational policy.</p>	<p>The Council welcomes the supportive comment.</p> <p>The Council notes the comment and is content that there is sufficient protection afforded for trees under the current legislative and policy provisions. However it is acknowledged that further guidance may be required at some point in the future on this matter to accompany the LPP (or form a part thereof).</p> <p>The Council notes the comment, but would emphasize that if sites were identified in the future, such designations would be considered at LPP stage and an appropriate policy would be formulated at that time.</p>



<p>Ards and North Down Borough Council acknowledges that designations will be reviewed and account taken of neighbouring council areas.</p>	<p>The Council welcomes the comment and will consider comments from adjoining Councils in relation to the designations at LLP stage should any cross boundary issues arise.</p>
<p>RSPB NI states that the precautionary principle, whilst mentioned in relation to policies NH1 and NH3, has not been included in SP19. Modification has been suggested.</p> <p>Reference has been made to SPA and Ramsar site, but the importance of Portmore Lough has not. Portmore Lough should be added to the narrative.</p> <p>Requests made to examine other areas of importance for nature conservation (as per list provided).</p>	<p>The Council notes the comment and agrees that the precautionary principle should be included for reference. The Council proposes for clarity, as a minor change, to include a new paragraph after the fourth paragraph of the J&amp;A, page 127, as follows:  <i>“The Council when determining the impacts of a proposed development on international or national designations, will consider the precautionary principle as set out in the Rio Declaration on Environment and Development 1992 that states; Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as reasons for postponing cost effective measures to prevent environmental degradation.”</i>  (Ref: MC7A Minor Changes Schedule)</p> <p>The Council proposes for clarity, as a minor change, to amend the J&amp;A under International Designations, page 127, as follows:  <i>“Within the Council area there is one Special Protection Area (SPA) and Ramsar Site at Lough Neagh including the water body of Portmore Lough. All proposals that may affect a European or Ramsar site must meet the requirements of NH1”</i>  (Ref: MC7B Minor Changes Schedule)</p> <p>Figure 6 (dPS page 128) is proposed to be amended from RAMSAR to <i>“Ramsar”</i>  (Ref: see Typo List)</p> <p>The Council notes the list provided and can advise that these will be considered at LPP stage.</p>
<p>Dfl states that SP19 Regional Strategic Objectives are not fully reflected referring to SPPS paragraph 6.172</p> <p>Note on reducing our carbon footprint and climate change.</p>	<p>The Council notes the comment but considers that Strategic Policy SP19 (a) provides sufficient policy direction which reflects the intention of SPPS paragraph 6.172 without being an exact replication/duplication of it.</p> <p>The Council recognises climate change under SP01 Sustainable Development (fourth paragraph of J&amp;A, page 42) it is therefore considered not necessary to replicate this under Strategic Policy SP19.</p>

No reference to specifics on the Lagan Valley Regional Park.

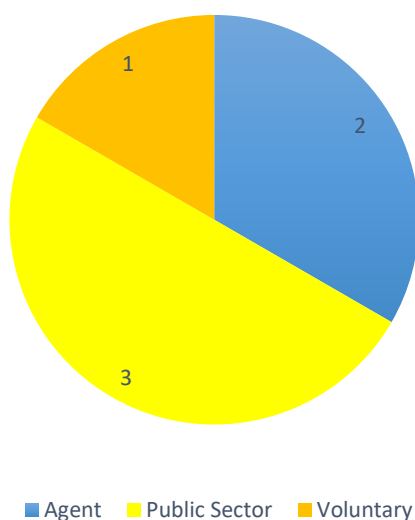
The Council considers that Strategic Policy SP19 provides sufficient policy direction for the LVRP under criteria (d) however considers it more appropriate to develop a site specific policy for the LVRP at the LPP stage.

## **F: A CONNECTED PLACE**

### **Strategic Policy 20 Transportation Infrastructure**

There were six representations received in respect of Strategic Policy 20 Transportation Infrastructure.

### Strategic Policy 20 by Respondent Type



### **Respondents**

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-041	Belfast City Council (BCC)
DPS-076	Gravis on behalf of Hillmark Homes
DPS-090	Dundonald Greenbelt Association
DPS-098	Gravis on behalf of Fraser Houses Ltd
DPS-109	Department for Infrastructure (DfI)

### **Council Consideration of Issues Raised**

Main Issue(s) Raised	Council Consideration
NIHE strongly supports SP20 as it promotes integration of transport and development, reducing single car travel needs (social housing tenants own fewer private cars) with promotion of improved connectivity through sustainable public transport and active travel networks. It aligns with a key objective of the draft PFG.	The Council welcomes the supportive comments.
Belfast City Council welcomes the requirements (a) to (d) for new development, however it is not evident that the policy is being applied to SMU sites, particularly SMU01. Housing is not	The Council notes and welcomes BCC's endorsement of Strategic Policy SP20 but refutes it is not being applied to SMU sites. Strategic Policy SP20, Parts (a) to (d) are

<p>sustainable, it does not reduce the need for motorised transport. LCCC refer to SMU01 being highly accessible and the link road key to unlocking development potential. Improving public transport access such as West Lisburn Rail Halt or the Park and Ride is not referred to.</p> <p>BCC refer to Objective 1 of the Local Transport Study (LTS) that seeks to enhance accessibility by road and public transport to Belfast, Derry/Londonderry, gateways and hubs. BCC consider the emphasis should be on enhancing accessibility by sustainable transport modes, reducing single occupancy car journeys for commuting. Objectives should also refer to improvements in air quality.</p> <p>Schemes identified in the Belfast Metropolitan Transport Study (BMTS) have emphasis on increasing road capacity. Increased frequency on the railway line does not refer to new halts, such as at West Lisburn, which would improve local and regional connectivity. The status of the West Lisburn rail halt is unclear as it is not included in the Key Transportation Infrastructure Schemes.</p>	<p>reflected as components of the Concept Master Plan referred to under SMU01 West Lisburn/Blaris, particularly Key Site Requirement (KSR) (g), <i>“appropriate provision of public transport, walking and cycling infrastructure within the site and linking to existing/planned networks, including West Lisburn railway halt”</i>; and (h) <i>“implementation of a car-free Primary Strategic Greenway linking the NCN9 towards Portadown”</i>.</p> <p>Within Strategic Policy SP20, Part (c) the Council encourages a modal shift away from private car dependency, hence the alternative infrastructure requirements referred to above at SMU01 West Lisburn/Blaris. Half of the SMU01 designation is for employment use, requiring road connections for competitiveness, this is reflected in Objective 1 of the LTS. The Council agrees that by encouraging a modal shift away from private cars, air quality is also improved. SMU02 requires similar provisions to be provided in its Concept Master Plan under KSR (f) and (g) and is located beside the Cairnshill strategic P&amp;R site. SMU03 also requires alternative transport provision to the private car in its CMP under KSR (e).</p> <p>The matters raised in connection to the BMTS are dealt with in the J&amp;A (page 140-141); Further work is required to determine the most appropriate demand management approach for the BMTS area to maximise the modal shift to sustainable modes of travel, while supporting local growth and trade. This will be explored with Councils through the provision of a new Belfast Metropolitan Transport Plan at LPP stage. However, it should be noted that in addition to references to West Lisburn rail halt in SMU01, its importance to the LDP, and indeed that of the railway network in general, is highlighted on page 29 – Infrastructure; page 39 – Objective F (No. 1); page 141 – Park &amp; Ride/Park &amp; Share; and, page 142 – Disused Transport Routes.</p>
<p>Gravis is generally supportive of SP20, specifically criteria (a) which is in line with objective 1 of the LTS. The North Feeder Road and the proposed Knockmore Link Road will create a north and west Lisburn orbital feeder route. A lack of investment to the south of</p>	<p>The Council welcomes the supportive comments.</p> <p>The Justification and Amplification to SP20 (pages 140 – 141) states that the Council will continue to work with DfI to determine future transportation needs within the Belfast</p>

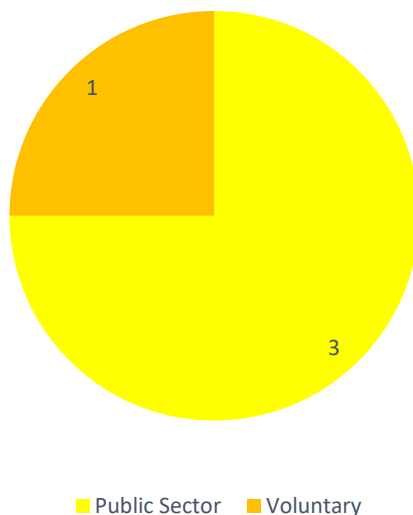
<p>Lisburn with the M1 junctions exceeding capacity at peak times and queuing into Lisburn is a problem, a Southern Relief Road would be the solution. The PAC had previously agreed to this in conjunction with housing.</p>	<p>Metropolitan area. Need for additional road infrastructure South East of Lisburn, suggested by Gravis in addition to housing, is not considered necessary to meet the housing growth of the Plan (further detail is provided under Strategic Policy SP08).</p>
<p>Dundonald Greenbelt Association welcome the dPS support for strategic greenways but believe there should be a statement encouraging the development of additional local paths, cycle and walkways.</p>	<p>The Council notes the comments. The dPS provides strategic policy (see page 14) and is the first of a two stage LDP, the next being the Local Policies Plan (LPP). Strategic Policy SP20 Transportation Infrastructure seeks a modal shift to sustainable transport. Throughout its J&amp;A, Strategic Policy SP20 emphasises alternative transport infrastructure, and active travel including cycle and walkways. Detail on specific 'local' schemes will be further considered at LPP stage through a Local Transport Plan (LTP) prepared in wider context of the new Belfast Metropolitan Transport Plan (BMTP).</p>
<p>Gravis is supportive of SP20, specifically the need to encourage a modal shift from private car dependency. On a site specific issue, the Quarry Corner – Comber Road strategic link road need is now diluted. An additional beneficial use (beyond use for reserved strategic link lands for housing) of this corridor is a direct walking/cycling route to link to Comber Community Greenway. This is in line with objective 3 of the LTS.</p>	<p>The Council welcomes the supportive comments. The Quarry Corner – Comber Road is a key transport proposal of strategic importance, previously identified in the BMTP and BMAP that remains unimplemented. The J&amp;A to SP20 (pages 140 – 141) states that the Council will continue to work with DfI to determine future transportation needs within the Belfast Metropolitan area. The predetermined use of this land, or future alternatives, are not a matter for this stage of the LDP. Detail on specific schemes will be further considered at LPP stage through a Local Transport Plan (LTP) prepared in the wider context of the new Belfast Metropolitan Transport Plan (BMTP).</p>
<p>DfI Transport NI, Eastern Division: LCCC should review the last sentence of the Key Transportation Infrastructure Schemes (J&amp;A, page 141) 'In addition, the LTS will seek to adopt a range of measures to reduce the need for reliance on the private car through allocation of residential zonings in proximity to services'.</p>	<p>DfI concerns in relation to the last sentence referring to the LTS are acknowledged. The Council proposes for clarity, as a minor change, to amend the J&amp;A, page 141, (under Key Transportation Infrastructure Schemes, last sentence) as follows:  <i>"In addition the Local Transport Study will <b>seek to adopt a range of measures to reduce the need for reliance on the private car through the allocation of residential zonings in proximity to services-consider the strengths and weaknesses of various modes of transport, including walking, cycling, public transport and roads. This will provide clarity on the transport</b></i></p>

<p>In Park &amp; Ride/Park &amp; Share (J&amp;A, page 141) the Council may wish to include reference to proposed expansion of Cairnshill P&amp;R site.</p>	<p><i>measures that DfI expect to deliver during the LDP period to 2032 and which will become evident at Local Policies Plan stage.”</i> (Ref: MC8A Minor Changes Schedule)</p> <p>The Council notes the comment and is aware of the recent proposal (post-publication of the draft Plan Strategy) for an expansion of Cairnshill P&amp;R site. The Council has decided not to add the suggested reference and, in order to ‘future-proof’ the policy to refer more generically to those sites which the Council has supported through the planning application process. As such the Council proposes for clarity, as a minor change, to amend the J&amp;A, page 141, (under Park &amp; Ride/Park &amp; Share, last sentence paragraph 2) as follows: “The Council recognises the value of the existing Park &amp; Ride sites in supporting a modal shift between private car and public transport usage and supports the proposed schemes at West Lisburn adjacent to the proposed new rail halt; Moira, adjacent to the railway station; and the extension of <del>other the Sprucefield</del> Park &amp; Ride sites which benefits from planning approval <del>providing 132 additional car parking spaces.”</del> (Ref: MC8B Minor Changes Schedule)</p>
<p>Existing areas of parking restraint (J&amp;A, page 143), Council should consider review at LPP.</p>	<p>The Council proposes for clarity, as a minor change, to amend the J&amp;A, page 143, (under Car Parking, last sentence) as follows: “<i>Areas of parking restraint along with</i> other measures to reduce the impact of car parking across the Council area will require further detailed assessment at the Local Policies Plan stage.” (Ref: MC8C Minor Changes Schedule)</p>
<p>DfI made general comments on the references to sustainable transport and integration with land use. There is further work required to LTS and BMTS to determine demand management approach to maximise modal shift to sustainable modes of travel while supporting local growth and trade. Continued engagement with DfI and other metropolitan councils is encouraged. Council should continue engagement with the Department's Transport and Roads section in relation to Key Transportation Infrastructure Schemes.</p>	<p>The Council notes the comments and agrees that further joint working between the Council and DfI is essential as both the revised BMTP and Local Transport Plan are progressed.</p>

## Strategic Policy 21 Renewable Energy

There were four representations received in respect of Strategic Policy 21 Renewable Energy.

### Strategic Policy 21 by Respondent Type



#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-092	Department for the Economy (DfE) – Minerals and Petroleum Branch (MAPB) and Geological Survey Northern Ireland (GSNI)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (DfI)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE in its role as Home Energy Conservation Authority in NI supports opportunities for renewable energy facilities in appropriate locations as these bring many social, economic and environmental benefits. Renewable energy schemes can reduce fuel poverty, improve air quality, bringing benefits to health and wellbeing.	The Council notes the comments.
DfE considers the policy could benefit from inclusion of geothermal heating systems as a means to meet net zero greenhouse gas emissions and promote sustainable economic growth. Below ground conditions in LCCC are suitable for use of Ground Source Heat Pump (GSHP) systems to heat single homes, housing	The Council notes and acknowledges the comments on the suitability of ground conditions for geothermal heating systems. Strategic Policy SP21 lists under Part (a) renewable energy technologies, these are not exclusive but provide examples of renewable technologies, including wind, solar, thermal, biomass and 'other' technologies. Geothermal

<p>developments, industrial, business and public sector complexes.</p>	<p>can fall into the categories of either ‘thermal’ or ‘other’ technologies’. It is for the proposer to decide on the type of renewable energy technology and as such the Council considers there is no need to prescribe any further technologies within the text body of the policy.</p>
<p>RSPB NI would support a strategic and spatial approach to renewable energy at regional level. However, in the absence of such, councils have responsibility to define such an approach at local government level. The dPS has however failed to identify a strategic spatial strategy for renewable energy development (or indeed any form of Special Countryside Area, or Other Areas of Constraint designation) which could assist in directing the most appropriate development to the most appropriate places. It is important to understand where renewable energy technologies can be located with lowest risk for sensitive species and habitats.</p> <p>RSPB NI recommends that further consideration be given to the creation of a strategic spatial strategy for renewable energy development, identifying those areas considered to be sensitive to such development (e.g. Red Kites in south County Down), with further consideration being given to the protection of such areas through spatial designation within the LDP.</p>	<p>The SPPS is a statement of the Department’s policy on important planning matters (page 6, paragraph 1.3) and requires the Council to formulate policies and proposals in its LDP reflective of the content of the SPPS. Regional strategic policy on renewables are set out in paragraphs 6.221 to 6.227 of the SPPS (pages 91 – 92) and forms the basis of Council’s approach through its Strategic Policy SP21 Renewable Energy and supplemented by Operational Policies RE1 and RE2 in Part 2 of the dPS.</p> <p>A spatial strategy setting out where renewable energy proposals should be restricted (if any) will be considered against the strategic policies of the SPPS at Local Policies Plan (LPP) stage. It should be noted however that it is the aim/objective of both the SPPS (paragraph 6.224) and this Strategic Policy SP21 (b) to minimise any visual or environmental impacts of renewable energy proposals, particularly within any designated areas.</p>
<p>RSPB NI and DfI highlight variances between the wording of SP21 and the SPPS.</p> <p>RSPB NI notes that SP21 has effectively narrowed the application of the 'cautious approach' advocated by paragraph 6.223 of the SPPS. In this regard, the SPPS states 'a <u>cautious approach</u> for renewable energy development proposals will apply within designated landscapes which are of significant value, such as Areas of Outstanding Natural Beauty, and the Giant's Causeway and Causeway Coast World Heritage Site, <u>and their wider settings</u>. In such sensitive landscapes, it may be difficult to accommodate renewable energy proposals, including wind turbines, without detriment to the region's cultural and natural heritage assets'. However, Strategic Policy RE1 states 'a</p>	<p>The Council notes the comments and considers it is important that there is consistency between the content of the SPPS and the dPS on this matter.</p> <p>The Council proposes for clarity, as a focussed change, to amend paragraph 3 of the J&amp;A, page 146, as follows:  “A <del>precautionary</del> <i>cautious</i> approach for renewable energy development proposals will apply within designated landscapes which are of significant value, such as Areas of Outstanding Natural Beauty <i>and their wider settings</i>. <i>In such sensitive landscapes</i>, it may <del>also</del> be difficult to accommodate renewable energy proposals, including wind turbines, without detriment to the region’s cultural and natural heritage assets.”  (Ref: FC3 Focussed Changes Schedule)</p>

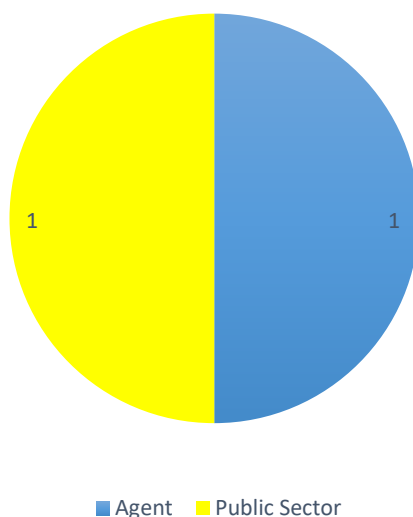


<p>precautionary approach for renewable energy development proposals will apply within designated landscapes which are of significant value, such as Areas of Outstanding Natural Beauty'. The proposed policy wording of Strategic policy 21 has effectively disregarded 'their wider settings' as required by the SPPS and refers only to the designated areas.</p>	
<p>DfI acknowledge the policy proposes a 'precautionary approach' which varies slightly to the SPPS 'cautionary approach'. There is no reference to either approach within designated landscapes, reliance is placed on the operational policies (RE1 and RE2) of Part 2 of the dPS.</p>	<p>Refer to comment provided above.</p>

## Strategic Policy 22 Telecommunications and Other Utilities

There were two representations received in respect of Strategic Policy 22 Telecommunications and Other Utilities.

### Strategic Policy 22 by Respondent Type



#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-096	Northern Ireland Electricity (NIE) Networks

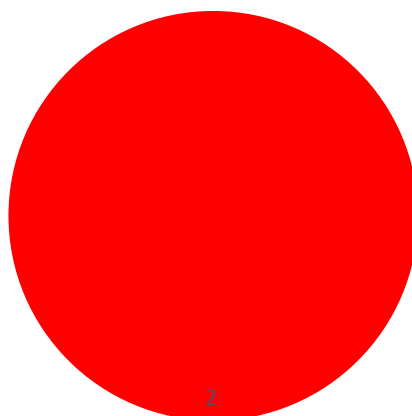
#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports SP22, recognising high speed broadband/mobile technology is essential for economic development, helps reduce social isolation and provide access to services. Welcomes acknowledgement of a capacity issue with existing WwTWs across the Council area and the need for a collaborative approach between NIW and the Council to ensure the needs of the community and the economy can be met.	The Council welcomes the supportive comments.
NIE Networks welcomes and supports Council's overall strategic objectives. Strategic objectives recognise the importance of providing and upgrading energy infrastructure in a supportive and balanced manner, seeking to address needs whilst minimising impact on visual amenity and the environment. It is critical that implementation and any subsequent policy wording is carefully considered to ensure it accurately reflects regional policy and is sound.	The Council welcomes the supportive comments.  NIE Networks, whilst supporting Strategic Policy SP22, raises specific concerns with the operational policy in dPS Part 2 (Policy UT1). This is addressed in greater detail under that operational policy.

## Strategic Policy 23 Waste Management

There were two representations received in respect of Strategic Policy 23 Waste Management.

### Strategic Policy 23 by Respondent Type



■ Voluntary

#### Respondents

Reference Number	Respondent
DPS-016	Whitemountain & District Community Association
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)

#### Council Consideration of Issues Raised

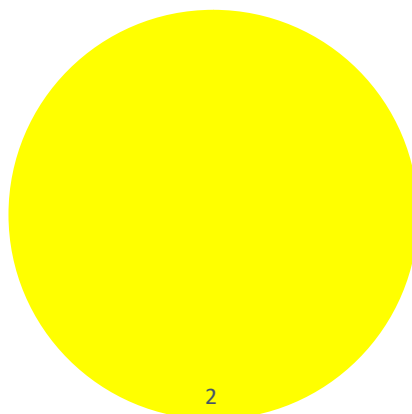
Main Issue(s) Raised	Council Consideration
Whitemountain & District Community Association raise a comment relating to text within paragraph 2 of the Justification and Amplification (page 154). The text talks of 'an additional facility' which may come through the LPP. This paragraph is referring to both landfill facilities and household recycling centres. Whitemountain & District Community Association finds the text confusing as it does not infer whether it is an additional landfill facility or a household recycling facility it is referring to.	The Council notes the comment. Strategic Policy SP23, in keeping with the Council's Waste Management Plan (WMP) seeks to reduce the amount of waste going to landfill and increase reuse and recycling. The text within the J&A on page 154 seeks to emphasise that, in addition to existing waste management facilities, there may be further need for a waste management facility within the lifetime of the LPP. This policy and its J&A represents the Council's recognition of its responsibility with regard to waste and the use of the term 'facility' is appropriate in this context and does not infer a type of facility nor its location. Such are matters to be dealt with at the Local Policies Plan stage or conversely through the submission of a planning application, assessed against all relevant policies including Operational Policies set out in Part 2 of the dPS.

<p>Paragraph 4 of the J&amp;A is considered to be unclear and fails soundness test CE3. That paragraph states that waste management facilities should avoid or minimise detrimental effects on people, the environment and amenity in accordance with operational policy set out in Part 2 of the Plan Strategy. Whitemountain &amp; District Community Association considers the word 'shall' would be more appropriate than 'should', to accord with basic human rights. An alternative word would be 'must' if the policy is meant to be legally binding.</p>	<p>It is not necessary that Strategic Policy SP23 be prescriptive on what any additional facility might be and the Council does not therefore propose to amend the wording of its J&amp;A.</p> <p>Consistency between the SPPS (paragraph 6.310, page 111) and the dPS is acknowledged. The Council proposes for clarity, as a minor change, to amend the J&amp;A, page 154, last paragraph, as follows:  <i>"This policy will ensure that <del>Proposals for waste management facilities should avoid or minimise any</del> detrimental effects on people, the environment, and <i>local</i> amenity <i>associated with waste management facilities are avoided or minimised</i> in accordance with operational policy set out in Part 2 of the Plan Strategy."</i>  (Ref: MC9A Minor Changes Schedule)</p>
<p>RSPB NI also refers to paragraph 4 in that it does not go far enough to state application of the 'precautionary principle' on proposals for waste management facilities. This principle is referred to in paragraph 6.322 of the SPPS and paragraph 1.19 of the extant Planning Policy Statement 11 – Waste Management.</p>	<p>Consistency between the content of the SPPS and the dPS is acknowledged. The Council proposes for clarity, as a minor change, to amend the J&amp;A, page 154, through inclusion of the following sentence to the end of the last paragraph, as follows:  <i>"In assessing all proposals the Council will be guided by the precautionary approach in accordance with para 6.322 of the SPPS."</i>  (Ref: MC9B Minor Changes Schedule)</p>

## Strategic Policy 24 Flooding

There were two representations received in respect of Strategic Policy 24 Flooding.

### Strategic Policy 24 by Respondent Type



■ Public Sector

#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-109	Department for Infrastructure (DfI)

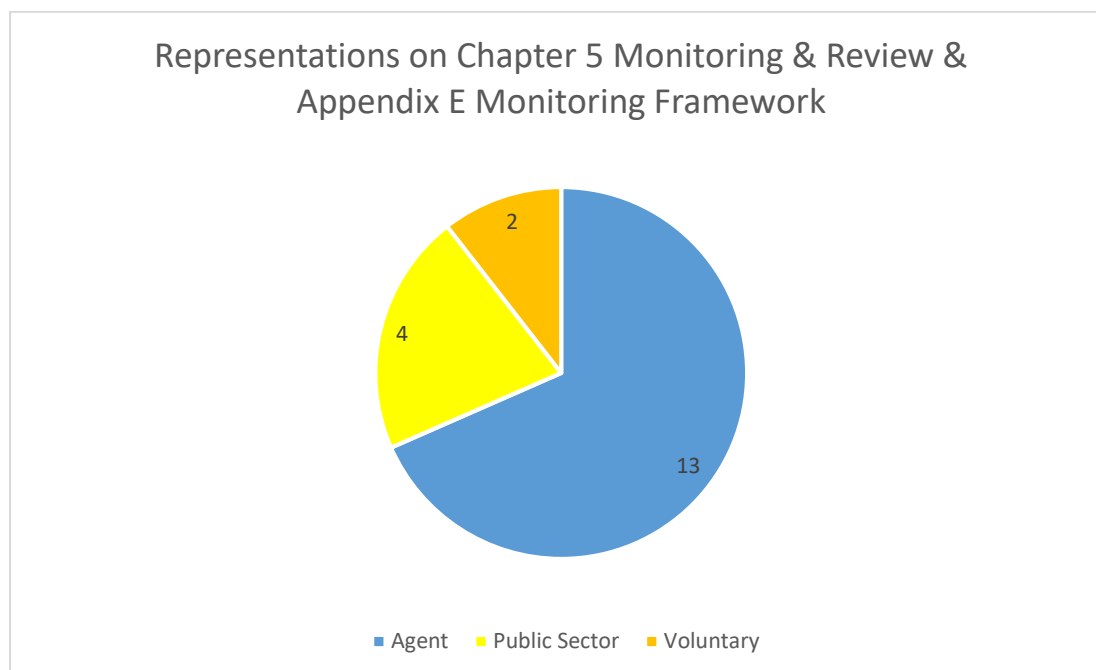
#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE welcomes this strategic policy and supports all elements (a – c) set out therein.	The Council welcomes the supportive comments.
DfI Water and Drainage Policy Division notes that page 156 of the Plan makes reference to “DfI Rivers, an Agency within DAERA”. This is incorrect. DfI Rivers is a business area within the Department for Infrastructure.	The Council notes the error as highlighted and proposes for clarity, as a minor change, to amend the J&A, page 156, fourth paragraph, as follows: “DfI Rivers, <i>within the Department for Infrastructure, an Agency within the Department of Agriculture, Environment and Rural Affairs (DAERA)</i> is the statutory drainage and flood defence authority for Northern Ireland” (Ref: MC10 Minor Changes Schedule)
DfI Water and Drainage Policy Division notes reference to SuDS as an aid to alleviate surface water flooding issues. SuDS are relevant for all development to reduce future risk of flooding, even where there is no historic flood risk.	The Council notes the comment and considers Strategic Policy SP24 is sufficiently robust through parts (a) to (c) that proposals should address and, where necessary, alleviate future flood risk, not just those with a record of historic flood risk. SuDS are encouraged within the J&A as a means to address surface water flooding.

<p>Dfl Rivers agrees in general with Strategic Policy 24, however flood risk associated with development in proximity of a controlled reservoir should have been included.</p>	<p>The Council notes the comment. It considers that, at a strategic level, the policies of the dPS capture this point, particularly part (c) <i>“adopt a precautionary approach in instances where the precise nature of any risk is as yet unproven but a potential risk has been identified”</i>. This should be read in conjunction with operational policy FLD5, Part 2 of the dPS.</p>
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## CHAPTER 5 MONITORING AND REVIEW (INCLUDES APPENDIX E MONITORING FRAMEWORK)

There were nineteen representations received in respect of Chapter 5 Monitoring and Review and the related Appendix E Monitoring Framework.



### Respondents

Reference Number	Respondent
DPS-006	Translink
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-030	Department for Communities (DfC) Historic Environment Division (HED)
DPS-034	Inaltus Limited on behalf of Lisburn North Development Consortium
DPS-035	Inaltus Limited on behalf of Porter Homes
DPS-039	Inaltus Limited on behalf of O’Kane Property Ltd
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-083	Planning Agent
DPS-085	Planning Agent
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-090	Dundonald Green Belt Association
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (Dfi)

## Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>Translink believe that the Monitoring Framework needs to identify more meaningful indicators and targets that will assist in monitoring and determining the impact of land use on the transportation network, and ultimately influencing its sustainability.</p>	<p>The Planning Act (Northern Ireland) 2011 and Regulation 25 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 provides requirements for monitoring how the objectives of the Local Development Plan are being achieved. This is supported in paragraph 5.36 of the SPPS, which advises that the Council must keep under review the implementation of their Plan. Development Plan Practice Note 06 Soundness (Test CE3) further advises that monitoring is essential for the delivery of the LDP.</p> <p>The Council accepts that better monitoring, together with regular reviews of the LDP will provide more flexibility enabling the Council to adapt to changing circumstances. The Monitoring Framework provided as Appendix E to the draft Plan Strategy has been developed to measure the relevant strategic objectives and policies against a range of Indicators and Targets appropriate to this stage of the Plan.</p> <p>The Council will continue to work with central government departments on the requirements of monitoring the Local Development Plan. It should be noted that further Indicators and Targets will be included at the Local Policies Plan Stage when zonings/designations are established.</p> <p>Additionally it is anticipated that the new Planning Portal will assist Councils in the collection of data to prepare reports in accordance with the draft Monitoring Framework attached at Appendix E of the dPS. This will be further reviewed at the LPP stage.</p>
<p>NIHE welcomes the information in the draft Plan Strategy on how the policies are monitored to ensure the Objectives are being met. In particular, they welcome the inclusion of Affordable Housing, Traveller and Specialist Accommodation indicators in Appendix E. However, they would like to see the number of Wheelchair Properties and Lifetime Homes approved included as indicators, and the number of planning permissions issued for dwellings with Integrated Renewable Energy Technology.</p>	<p>The Planning Act (Northern Ireland) 2011 and Regulation 25 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 provides requirements for monitoring how the objectives of the Local Development Plan are being achieved. This is supported in paragraph 5.36 of the SPPS which advises that the Council must keep under review the implementation of their Plan. Development Plan Practice Note 06 Soundness (Test CE3) further advises that monitoring is essential for the delivery of the LDP.</p>



	<p>The Council accepts that better monitoring, together with regular reviews of the LDP will provide more flexibility enabling the Council to adapt to changing circumstances. The Monitoring Framework provided as Appendix E to the draft Plan Strategy has been developed to measure the relevant strategic objectives and policies against a range of Indicators and Targets appropriate to this stage of the Plan.</p> <p>The Council will continue to work with central government departments on the requirements of monitoring the Local Development Plan. It should be noted that further Indicators and Targets will be included at the Local Policies Plan Stage when zonings/designations are established.</p> <p>Additionally it is anticipated that the new Planning Portal will assist Councils in the collection of data to prepare reports in accordance with the draft Monitoring Framework attached at Appendix E of the dPS. This will be further reviewed at the LPP stage.</p>
<p>HED refer to the Monitoring Indicators in Appendix E and that these need to be more robust and measurable in order to be sound in relation to Policy HE1.</p> <p>HED considers that the Monitoring Framework for Plan Objective E to be unsound when considered against the Coherence and Effectiveness test (CE3) e.g. in relation to archaeological remains which are not articulated at all and fail to provide numerical measurements to prompt trigger points for review.</p> <p>Indicators need to be targeted and measured and an example has been put forward for the Number of demolitions/conversions of listed buildings. The Monitoring Target (less than 5% of applications for demolition /conversion of listed buildings recommended for approval contrary to the advice from HED over a 5 year period. The Trigger Point could then be more than 5% are approved for demolition/conversions of listed buildings contrary to advice from HED over a 5 year period.</p>	<p>The Planning Act (Northern Ireland) 2011 and Regulation 25 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 provides requirements for monitoring how the objectives of the Local Development Plan are being achieved. This is supported in paragraph 5.36 of the SPPS which advises that the Council must keep under review the implementation of their Plan. Development Plan Practice Note 06 Soundness (Test CE3) further advises that monitoring is essential for the delivery of the LDP.</p> <p>The Council accepts that better monitoring, together with regular reviews of the LDP will provide more flexibility enabling the Council to adapt to changing circumstances. The Monitoring Framework provided as Appendix E to the draft Plan Strategy has been developed to measure the relevant strategic objectives and policies against a range of Indicators and Targets appropriate to this stage of the Plan.</p> <p>The Council will continue to work with central government departments on the requirements of monitoring the Local Development Plan. It</p>

<p>HED considers that the language used in the SA indicators with regard to monitoring should be carried forward into the draft Plan Strategy (i.e. proposals permitted involving heritage assets contrary to the advice from DfC – Historic Environment Division).</p> <p>HED also recommends the inclusion of a general indicator relating to the historic environment. Number of planning decisions which go against the advice of HED in relation to impacts of all heritage assets, including archaeological remains and their settings.</p> <p>HED also recommends an indicator for non-designated heritage assets. The number of non-designated heritage assets (vernacular buildings and locally important buildings) re-used/enhanced, demolished or replaced.</p> <p>The draft Plan Strategy also fails to provide monitoring in relation to archaeology and should also consider effects on monuments of regional importance, local importance and their setting.</p> <p>HED therefore considers it may be appropriate for monitoring to also include. Number of consultations where evaluations to inform decisions are recommended by HED, but which instead receive approval with planning conditions for archaeological work. Number of scheduled monument consents in relation to development work initiated through the planning process. Monitoring of applications in various AAPs to which archaeological conditions applied.</p>	<p>should be noted that further Indicators and Targets will be included at the Local Policies Plan Stage when zonings/designations are established.</p> <p>Additionally it is anticipated that the new Planning Portal will assist Councils in the collection of data to prepare reports in accordance with the draft Monitoring Framework attached at Appendix E of the dPS. This will be further reviewed at the LPP stage.</p>
<p>Inaltus on behalf of three clients states that the Plan Strategy is unsound under CE3 in that there is no clear mechanisms to monitor the Plan Strategy as the Council have not prepared a robust and transparent housing trajectory. With concerns about the under estimate of the Housing Requirement figure and the housing market problems that are apparent in the undersupply of housing, it is vital that the Council prepare a housing trajectory to demonstrate that it can meet the 5 year rolling housing land supply and if it is failing to do so, there should be mechanism for the Council to intervene and release additional lands.</p>	<p>Housing allocation is addressed under Chapter 4 of the draft Plan Strategy which details the approach taken and the Strategic Housing Allocation. The Council’s Annual Housing Monitor Report sets out the number of residential units built and the potential units remaining and provides evidence if any additional land is required over the Plan period.</p> <p>A five yearly review will be carried out following the adoption of the Local Policies Plan (LPP) to ensure the LDP is kept up to date and is fully reflective of the monitoring framework.</p>

<p>Gravis Planning on behalf of 8 clients broadly support the monitoring indicators to measure how well the plan is performing. Monitoring will be essential for the delivery of the Local Development Plan and should provide the basis to trigger any requirement to amend the strategy, policies and proposals of the plan. However, projected housing figures and other relevant policies should be amended to enable accurate monitoring of the plan.</p>	<p>The Council welcomes the support for the monitoring indicators. However, housing allocation is addressed under Chapter 4 of the draft Plan Strategy which details the approach taken and the Strategic Housing Allocation. The Council’s Annual Housing Monitor Report sets out the number of residential units built and the potential units remaining and provides evidence if additional land is required over the Plan period.</p> <p>A five yearly review will be carried out following the adoption of the Local Policies Plan (LPP) to ensure the LDP is kept up to date and is fully reflective of the monitoring framework.</p>
<p>Planning Agents consider that the draft Plan Strategy is unsound, there is a lack of consideration of the policy context, coherency and effectiveness in terms of the practical effects across a range of issues that include management, monitoring and implementation measures.</p> <p>Chapter 5 Monitoring and Implementation of Part 1 of the draft Plan Strategy acknowledges that the need to monitor land and the additional housing units built but does not explicitly indicate the requirement to monitor the additional housing units over two periods i.e. the housing land supply and net additional units built in the period 1<sup>st</sup> April – 31<sup>st</sup> March each year and also in the period since the adoption of the Local Policies Plan. These are two separate periods both of which must be monitored. The dPS is therefore deficient in terms of monitoring the take up of housing land.</p> <p>The proposed monitoring does not meet the legislative requirement and is entirely deficient in terms of the measures and approach to implementation in that there are no policies setting out the actions the Council will take to allocate additional housing land should a shortage be evidenced through the monitoring process. Additionally, there is no mechanism of how it will determine which additional lands will be brought forward as part of the implementation of the reviews.</p>	<p>Housing allocation is addressed under Chapter 4 of the draft Plan Strategy which details the approach taken and the Strategic Housing Allocation. The Council’s Annual Housing Monitor Report sets out the number of residential units built and the potential units remaining and provides evidence if additional land is required over the Plan period.</p> <p>The Planning Act (Northern Ireland) 2011 and Regulation 25 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 provides requirements for monitoring how the objectives of the Local Development Plan are being achieved. This is supported in paragraph 5.36 of the SPPS which advises that the Council must keep under review the implementation of their Plan. Development Plan Practice Note 06 Soundness (Test CE3) further advises that monitoring is essential for the delivery of the LDP.</p> <p>The Council accepts that better monitoring, together with regular reviews of the LDP will provide more flexibility enabling the Council to adapt to changing circumstances. The Monitoring Framework provided as Appendix E to the draft Plan Strategy has been developed to measure the relevant objectives and strategic policies against a range of Indicators and Targets appropriate to this stage of the Plan.</p>

<p>Chapter 5 also acknowledges that there is to be a five-yearly review of the plan. However, there are no provision for how these reviews and reports are to be dealt with if there is a shortfall in housing land. There is no requirement for the Council to take any form of action. Chapter 5 must therefore include policies for adequately covering three aspects:</p> <ul style="list-style-type: none"> <li>(a) Monitoring</li> <li>(b) Reviewing; and</li> <li>(c) Implementation</li> </ul> <p>One solution is for the dPS to include policies for a strategic reserve of housing land to ensure there will be a five year supply at the end of the plan period to ensure that during the reviews at year 5 and year 10 that no additional lands are required to be brought forward.</p> <p>Further, the monitoring does not address floorspace build out or take up rates for non-residential uses, while baselines for retailing, town centre and night-time economy are also missing from the Chapter 5.</p>	<p>The Council will continue to work with central government departments on the requirements of monitoring the Local Development Plan. It should be noted that further Indicators and Targets will be included at the Local Policies Plan Stage when zonings/designations are established.</p> <p>Additionally it is anticipated that the new Planning Portal will assist Councils in the collection of data to prepare reports in accordance with the draft Monitoring Framework attached at Appendix E of the dPS. This will be further reviewed at the LPP stage.</p>
<p>Dundonald Green Belt Association states that the Monitoring and Implementation Framework may not be robust enough to deliver sustainable potential in the way required by policy.</p> <p>The purpose to which the review mechanism will be put is unclear as is the extent to which it will allow for a flexible response to changing circumstances. Dundonald Green Belt Association would like to see a review mechanism that is more obviously ‘hands on’ and robust enough to maximise the opportunities that will arise to increase the sustainability of the plan. (This will, for example explicitly state that windfall figures should be actively factored into plan numbers on an ongoing basis (SPPS 6.139), a practice that reinforces the case for phasing and is likely to increase the plan’s ability to reduce the consumption of greenfield land).</p>	<p>Housing allocation is addressed under Chapter 4 of the draft Plan Strategy which details the approach taken and the Strategic Housing Allocation including the windfall potential. The Council’s Annual Housing Monitor Report sets out the number of residential units built and the potential units remaining and provides evidence if additional land is required over the plan period.</p> <p>The Planning Act (Northern Ireland) 2011 and Regulation 25 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 provides requirements for monitoring how the objectives of the Local Development Plan are being achieved. This is supported in paragraph 5.36 of the SPPS which advises that the Council must keep under review the implementation of their Plan. Development Plan Practice Note 06 Soundness (Test CE3) further advises that monitoring is essential for the delivery of the LDP.</p> <p>The Council accepts that better monitoring, together with regular reviews of the LDP will provide more flexibility enabling the Council to adapt to changing circumstances. The</p>

	<p>Monitoring Framework provided as Appendix E to the draft Plan Strategy has been developed to measure the relevant objectives and strategic policies against a range of Indicators and Targets appropriate to this stage of the Plan.</p> <p>The Council will continue to work with central government departments on the requirements of monitoring for the Local Development Plan. It should be noted that further Indicators and Targets will be included at the Local Policies Plan Stage when zonings/designations are established.</p> <p>Additionally it is anticipated that the new Planning Portal will assist Councils in the collection of data to prepare reports in accordance with the draft Monitoring Framework attached at Appendix E of the dPS. This will be further reviewed at the LPP stage.</p>
<p>RSPB NI has submitted a substantive response to Appendix E - Monitoring Framework page 175</p> <p><b>Details and Modifications (i)</b>  In general terms, RSPB NI has concerns with the monitoring targets and trigger points as currently proposed as they are not all considered to be SMART (i.e. specific, measurable, achievable, relevant and timebound), and at this time represent no more than unqualified bland statements in the absence of any contextual baseline information, or trigger factors for remedial action. LCCC needs to examine its Monitoring Plan in this regard as a matter of urgency in order to allow an effective assessment of how the Plan Strategy objectives are being achieved. In general, percentage or numeric triggers can be easier to measure and therefore effectively monitored. For example - even if it is a basic requirement for an increase or decrease over existing.</p> <p>Furthermore, there are considered to be obvious omissions from the indicators and measures sections which would facilitate an enhanced assessment of the Plan Strategy in meeting its objectives.</p>	<p>The Planning Act (Northern Ireland) 2011 and Regulation 25 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 provides requirements for monitoring how the objectives of the Local Development Plan are being achieved. This is supported in paragraph 5.36 of the SPPS which advises that the Council must keep under review the implementation of their Plan. Development Plan Practice Note 06 Soundness (Test CE3) further advises that monitoring is essential for the delivery of the LDP.</p> <p>The Council accepts that better monitoring, together with regular reviews of the LDP will provide more flexibility enabling the Council to adapt to changing circumstances. The Monitoring Framework provided as Appendix E to the draft Plan Strategy has been developed to measure the relevant objectives and strategic policies against a range of Indicators and Targets appropriate to this stage of the Plan.</p> <p>The Council will continue to work with central government departments on the requirements of monitoring for the Local Development Plan. It should be noted that further Indicators and Targets will be included at the Local Policies</p>

**Details (ii)**

No details have been provided in respect of the Connected Place Objective of mitigating and adapting to climate change. Our environment is in crisis. The United Nations and other international institutions have issued stark warnings that we have only 12 years to avert a climate catastrophe and species are declining at a rate not previously seen. Northern Ireland is not immune to this. The State of Nature 2016 report revealed that between 1970 and 2013, 56% of UK species declined. Although the principal driver of change is agricultural intensification, urbanisation was identified as one of the top ten drivers of biodiversity change. The RSPB therefore attaches great importance to ensuring that planning systems and policies across the UK protect the environment and promote development that is truly sustainable - an approach that we know is feasible through our partnership with Barratt Developments to build new communities, providing homes for people and wildlife (refer to Kingsbrook example in our POP response for further details).

Against this background, the LDP monitoring framework should be measuring what contribution the LDP is contributing to climate change and mitigation measures, in order to ascertain whether such is sufficient to address the climate and ecological emergencies faced.

**Modifications (ii)**

An Indicator Reference could include for example the restriction of further commercial peat extraction, where the target is no new approvals for peat extraction (either new sites or extension of existing), and the Review Trigger is more than 1 application permitted in any one year.

**Details (iii)**

Objective E: A Green Place - Protecting and Enhancing the Historic and Natural Environment - Given the requirement to further sustainable development (as laid down in the Planning Act 2011 and the SPPS), the statutory duty placed on every public body to further the conservation of biodiversity (as articulated by the WANE Act 2011) Northern Ireland,

Plan Stage when zonings/designations are established.

Additionally it is anticipated that the new Planning Portal will assist Councils in the collection of data to prepare reports in accordance with the draft Monitoring Framework attached at Appendix E of the dPS. This will be further reviewed at the LPP stage.

alongside the objectives of the NI and EU Biodiversity Strategies, and other legislative provisions, coupled with LCCC's acknowledgement that climate change remains high on its agenda, it is considered that there is a real need to provide a fit for purpose monitoring framework in this regard.

**Modifications (II)**

Here the indicator could be 'furthering sustainable development, where the Target is halting biodiversity loss, and the Review Trigger is more than 1 application permitted in any one year contrary to NIEA advice.

**Details and Modifications (iii)**

Similarly, with regard to the indicator for 'Number of Permissions on International, National, Local sites, designated sites and plan designations: Ramsar, ASSI, national nature reserve, local nature reserve, wildlife refuge, AONBs, Areas of High Scenic Value, Green Wedges and Local Landscape Policy Areas', a SMART supplementary trigger to that already proposed (i.e. loss of designated sites protected or damage to sensitive landscapes and biodiversity through planning approvals) could be, 'more than 1 application permitted in any one year contrary to DAERA advice'. Such an approach could be equally applied to the Development within Fluvial or Pluvial Zones, with DFI Rivers Agency being the relevant advising authority.

Monitoring Indicators and Trigger Points page 182

**Details and Modifications**

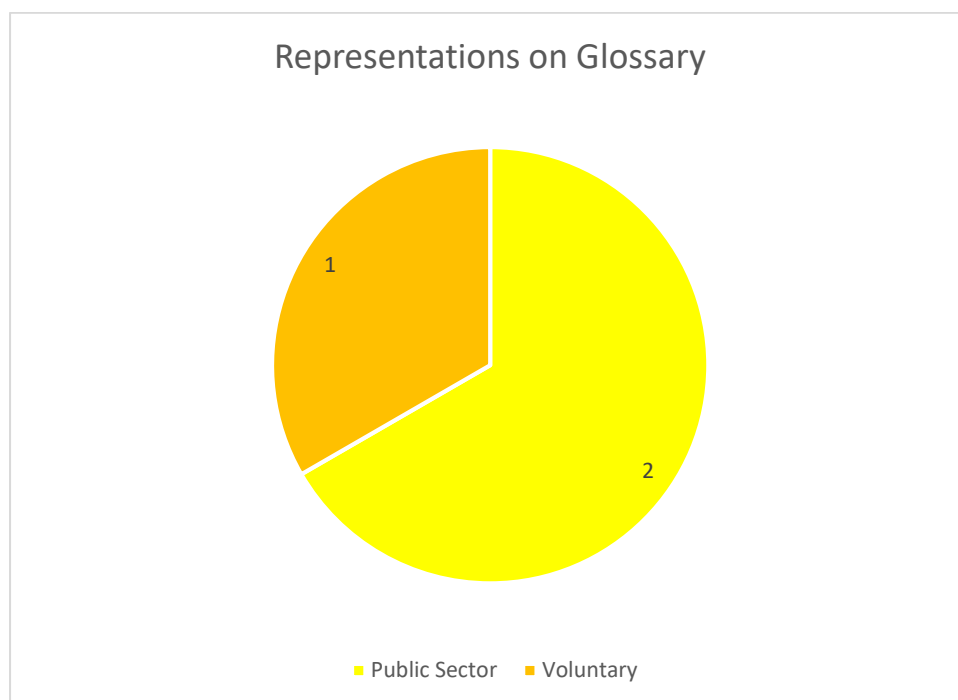
It is unclear how the proposed monitoring framework will allow for the differentiation between the application of the various options outlined i.e. how it will actually be implemented? For example, it is not possible to establish how the monitoring framework will allow for the identification of training required (blue) from the need to review policy (amber), this is compounded by the lack of a SMART Monitoring Framework.

<p>Further detail is required to be set out by the Council in order to qualify how the Monitoring Framework can be effectively implemented.</p>	
<p>Dfl notes the provisions in the draft Plan Strategy on monitoring and welcomes the range of issues identified within the proposed monitoring framework. DPPN 6 states that ‘monitoring is essential for the delivery of the DPD and should provide the basis to trigger any requirement to amend the strategy, policies and proposals.’ Dfl welcomes the focus on identifying targets and triggers in respect of indicators presented. This will assist in measuring policy effectiveness.</p> <p>In general whilst the inclusion of targets and trigger points is helpful careful consideration should be given to the wording of the trigger points to ensure that they are clear and unambiguous and will allow for effective monitoring of the plan.</p>	<p>The Planning Act (Northern Ireland) 2011 and Regulation 25 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 provides requirements for monitoring how the objectives of the Local Development Plan are being achieved. This is supported in paragraph 5.36 of the SPPS which advises that the Council must keep under review the implementation of their Plan. Development Plan Practice Note 06 Soundness (Test CE3) further advises that monitoring is essential for the delivery of the LDP.</p> <p>The Council accepts that better monitoring, together with regular reviews of the LDP will provide more flexibility enabling the Council to adapt to changing circumstances. The Monitoring Framework provided as Appendix E to the draft Plan Strategy has been developed to measure the relevant objectives and strategic policies against a range of Indicators and Targets appropriate to this stage of the Plan.</p> <p>The Council will continue to work with central government departments on the requirements of monitoring for the Local Development Plan. It should be noted that further Indicators and Targets will be included at the Local Policies Plan Stage when zonings/designations are established.</p> <p>Additionally it is anticipated that the new Planning Portal will assist Councils in the collection of data to prepare reports in accordance with the draft Monitoring Framework attached at Appendix E of the dPS. This will be further reviewed at the LPP stage.</p>



## GLOSSARY PART 1

There were three representations received in respect of the Glossary in Part 1.



### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-016	Whitemountain & District Community Association
DPS-030	Department for Communities (DfC) Historic Environment Division (HED)

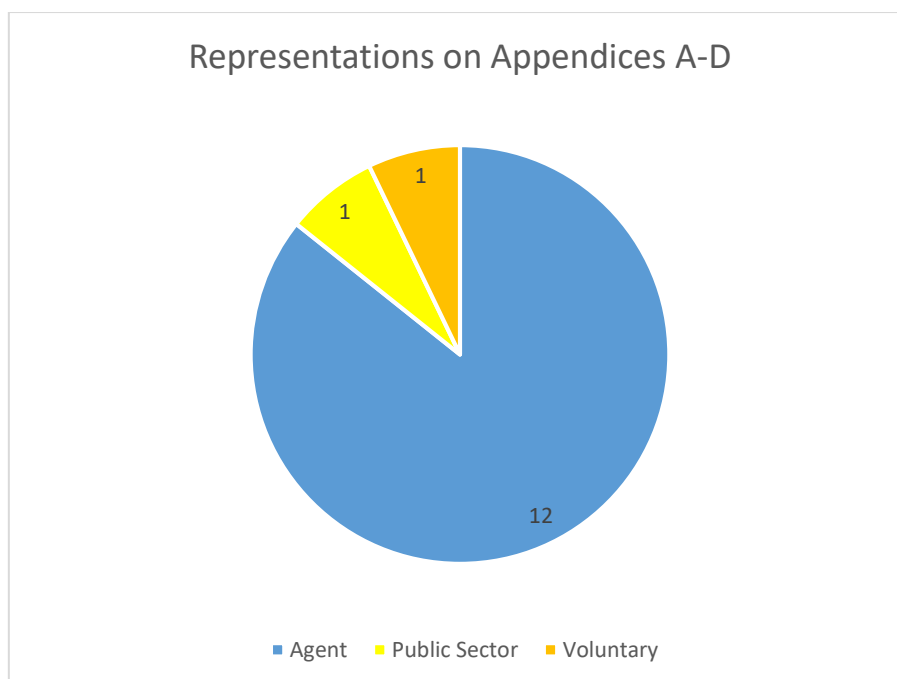
### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE would like to see Affordable Housing and Specialised Housing defined in the Glossary of Part 1.	The Council notes the comment and for clarity proposes to include the definition as a minor change to the glossary for Part 1 of the DPS, page 160, as follows (See Council Consideration under SP08 Housing in Settlements): <i>“For the purpose of this Plan Strategy, the current definition of affordable housing accords with the SPPS definition provided in its glossary, (page 114).”</i> (Ref: MC3A Minor Changes Schedule)
Whitemountain & District Community Association has asked that the Glossary should include the definition of a National Nature Reserve.	The Council proposes for clarity, as a minor change, to include the definition of National Nature Reserve in the glossary for Part 1, page 161, as follows: <i>“National Nature Reserve – as</i>

	<i>defined Under the Nature Conservation and Amenity Lands (Northern Ireland) Order 1985.” (Ref: MC11A Minor Changes Schedule)</i>
<p>HED recommends including definition for a ‘Heritage Asset’ as follows: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.</p> <p>HED also recommends amending the following definitions as below:</p> <p>Listed Building: A listed building is a structure which the Department for Communities has included in a statutory list of buildings of special architectural and/or historic Interest.</p> <p>Historic Park, Garden or Demesne of Special Historic Interest: An identified site of international or regional importance within Northern Ireland, included in the Register of Parks, Gardens and Demesnes of special historic interest, maintained by the Department for Communities.</p> <p>Design and Access Statement: A Design and Access Statement [D&amp;AS] is a single document that explains the design thinking behind a planning application. It provides a framework for applicants to explain and to justify how a proposed development is a suitable response to the site and its setting.</p> <p>Scheduled Monuments Statutory designations of archaeological sites or other heritage assets of national importance protecting them from damage or disturbance.</p>	<p>The Council proposes for clarity, as a minor change, to include the definition of Heritage Asset in the glossary as follows: “Heritage Asset: <i>A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.</i>”</p> <p>The Council notes the suggested amendments. The Council proposes for clarity, as a minor change, to amend the definitions recommended by HED as follows:</p> <p>Part 1, page 161, Listed Building: <i>“A listed building is a structure which the Department for Communities has included in a statutory list of buildings of special architectural and/or historic Interest.”</i></p> <p>Part 1, page 161, “Historic Park, Garden or Demesne of Special Historic Interest: <i>An identified site of international or regional importance within Northern Ireland, included in the Register of Parks, Gardens and Demesnes of special historic interest, maintained by the Department for Communities.”</i></p> <p>Part 1, page 160, Design and Access Statement: <i>“A Design and Access Statement [D&amp;AS] is a single document that explains the design thinking behind a planning application. It provides a framework for applicants to explain and to justify how a proposed development is a suitable response to the site and its setting.”</i></p> <p>Part 1, page 162, Scheduled Monuments: <i>“Statutory designations of archaeological sites or other heritage assets of national importance protecting them from damage or disturbance.” (Ref: MC11B Minor Changes Schedule)</i></p>

## APPENDICES A-D

There were fourteen representations received in respect of Appendices A-D.



Please note that a number of representations refer to the Soundness Tests from Development Plan Practice Note 6 (Appendix A), the Technical Supplements Accompanying the Development Plan (Appendix B) and the Statutory Link with the Community Plan (Appendix C).

Any comments and the Council's consideration of these are included in the Introduction, Policy and Spatial Context, Vision/Plan Objectives and the Strategic Policies and Spatial Strategy identified throughout the Consultation Report. They are not repeated here as they form the wider consideration for the detailed Policies and Spatial Strategy.

### Respondents

Reference Number	Respondent
DPS-016	Whitemountain & District Community Association
DPS-034	Inaltus Limited on behalf of Lisburn North Development Consortium
DPS-035	Inaltus Limited on behalf of Porter Homes
DPS-039	Inaltus Limited on behalf of O'Kane Property Ltd
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-095	Turley on behalf of Plantation Landowner Group
DPS-109	Department for Infrastructure (DfI)

APPENDIX D Main Issue(s) Raised	Council Consideration
<p>Whitemountain &amp; District Community Association has referred to Appendix D page 174 detailing the words Open Countryside. For clarification, these words should also be reflected in page 49 Table 1 and Figure 3 to give discussion to the points inclusive of Open Countryside residents.</p>	<p>Table 1 (page 49, dPS) has been amended to take account of the percentage of population in the Countryside.</p> <p>It is not necessary to include the Countryside in Figure 3 as this relates purely to the Settlement Hierarchy.</p> <p>See Council consideration under Strategic Policy SP08 Housing in Settlements.</p>
<p>Inaltus on behalf of Lisburn North Development Consortium and Porter Homes notes that Appendix D states that there is a good supply of housing land in Lisburn; limited scope for new Development in Lisburn Greater Urban Area; Carryduff has sufficient land remaining for housing to meet the requirement; Hillsborough has a good supply of undeveloped housing land; villages can accommodate small housing estates and small settlements have potential for small scale housing. These statements are unconnected to whether there is a need to expand the settlements or not. The Spatial Strategy is based on a flawed approach to the Housing Requirement.</p>	<p>The Housing Requirements are detailed under Chapter 4 of the draft Plan Strategy which includes the Strategic Housing Allocation and the approach to housing allocation. The issues regarding the settlements have been robustly assessed by the Council including the RDS Housing Growth Indicators, use of the RDS housing evaluation framework, allowance for existing housing commitments, urban capacity study, allowance for windfall housing and the NIHE Housing Needs Assessment. Further detail is provided in Technical Supplement 1 - Housing Growth Study, Technical Supplement 2 – Urban Capacity Study and Technical Supplement 6 – Countryside Assessment which includes Settlement Appraisals.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>
<p>Inaltus on behalf of O’Kane Property Ltd states that it is notable that Appendix D states that small settlements act as a focal point for the rural community with mostly infill and small scale opportunities available for housing and other opportunities to sustain rural communities without changing the rural character of these settlements. The Representation states that there are no constraints identified for Hillhall. These statements are unconnected to whether there is a need to expand the settlements or not. The Spatial Strategy is based on a flawed approach to the Housing Requirement.</p>	<p>The Housing Requirements are detailed under Chapter 4 of the draft Plan Strategy which includes the Strategic Housing Allocation and the approach to housing allocation. The issues regarding the settlements have been robustly assessed by the Council including the RDS Housing Growth Indicators, use of the RDS housing evaluation framework, allowance for existing housing commitments, urban capacity study, allowance for windfall housing and the NIHE Housing Needs Assessment. Further detail is provided in Technical Supplement 1 - Housing Growth Study, Technical Supplement 2 – Urban Capacity Study and Technical Supplement 6 – Countryside Assessment which includes Settlement Appraisals.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation</p>

	(Annex 1 and Addendum to Housing Growth Study), January 2021.
<p>Gravis Planning on behalf of MRP investment &amp; Development Ltd refers to Appendix D Evaluation of Settlement Characteristics with their emphasis on Carryduff. The Appendix states that Carryduff has sufficient land remaining for housing and other uses and no additional land is required to meet these requirements. The Representation disagrees and also states that Carryduff should have an increased housing growth allocation compared to the other towns mentioned as the town is an attractive place to live for people working in Belfast and other areas.</p>	<p>The Housing Requirements are detailed under Chapter 4 of the draft Plan Strategy which includes the Strategic Housing Allocation and the approach to housing allocation. The issues regarding the settlements have been robustly assessed by the Council including the RDS Housing Growth Indicators, use of the RDS housing evaluation framework, allowance for existing housing commitments, urban capacity study, allowance for windfall housing and the NIHE Housing Needs Assessment. Further detail is provided in Technical Supplement 1 - Housing Growth Study, Technical Supplement 2 – Urban Capacity Study and Technical Supplement 6 – Countryside Assessment which includes Settlement Appraisals.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>
<p>The Representation also refers to the Waste Water Treatment Capacity, as identified in the section, stating that it is vital that the Department for Infrastructure and the Department for Finance develop options on how to provide good governance and financing solutions for Water security in NI by engaging with Industry Experts. Without addressing the NI Water capacity issues, housing delivery will cease.</p>	<p>The Council will continue to work with NI Water and DfI to help inform NI Water’s business planning, which aims to address future water and waste-water needs.</p> <p>DfI understands that NI Water will also continue to help manage this issue by working closely with the Council, to help facilitate development, where possible.</p>
<p>Gravis Planning on behalf of Killultagh refers to Appendix D Evaluation of Settlement Characteristics with their emphasis on Stoneyford and available capacity in the Waste-Water Treatment Works. They argue that additional housing should be supported in the Local Policies Plan. They refer to the text that villages are important local service centres that provide goods, services and facilities to meet the needs of the rural area. They are good locations for rural businesses and can accommodate residential development in the form of small housing estates, housing groups and individual dwellings.</p>	<p>The Council will continue to work with NI Water and the Department for Infrastructure to help to inform NI Water’s business planning, which aims to address future water and waste-water needs. DfI understands that NI Water will also continue to help manage this issue by working closely with the Council, to help facilitate development, where possible.</p> <p>The Housing Requirements are detailed under Chapter 4 of the draft Plan Strategy which includes the Strategic Housing Allocation and the approach to housing allocation. The issues regarding the settlements have been robustly assessed by the Council including the RDS Housing Growth Indicators, use of the RDS Housing Evaluation Framework, allowance for</p>

	<p>existing housing commitments, urban capacity study, allowance for windfall housing and the NIHE Housing Needs Assessment. Further detail is provided in Technical Supplement 1 -Housing Growth Study, Technical Supplement 2 – Urban Capacity Study and Technical Supplement 6 – Countryside Assessment which includes Settlement Appraisals.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>
<p>Gravis Planning on behalf of an individual refers to Appendix D Evaluation of Settlement Characteristics with their emphasis on Lower Ballinderry. They argue that additional housing should be supported in the Local Policies Plan. They refer to the text that villages are important local service centres that provide goods, services and facilities to meet the needs of the rural area. They are good locations for rural businesses and can accommodate residential development in the form of small housing estates, housing groups and individual dwellings.</p> <p>The Representation also refers to the Waste Water Treatment Capacity as identified in the section and they state that it is vital that the Department for Infrastructure and the Department for Finance develop options on how to provide good governance and financing solutions for Water security in NI by engaging with Industry Experts. Without addressing the NI Water capacity issues, housing delivery will cease.</p>	<p>The Housing Requirements are detailed under Chapter 4 of the draft Plan Strategy which includes the Strategic Housing Allocation and the approach to housing allocation. The issues regarding the settlements have been robustly assessed by the Council including the RDS Housing Growth Indicators, use of the RDS Housing Evaluation Framework, allowance for existing housing commitments, urban capacity study, allowance for windfall housing and the NIHE Housing Needs Assessment. Further detail is provided in Technical Supplement 1 - Housing Growth Study, Technical Supplement 2 – Urban Capacity Study and Technical Supplement 6 – Countryside Assessment which includes Settlement Appraisals.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p> <p>The Council will continue to work with NI Water and DfI to help to inform NI Water’s business planning, which aims to address future water and waste-water needs.</p> <p>DfI understands that NI Water will also continue to help manage this issue by working closely with the Council, to help facilitate development, where possible.</p>
<p>Gravis Planning on behalf of Hillmark Homes refers to Appendix D Evaluation of Settlement Characteristics with their emphasis on Lisburn City. They argue that additional housing land should be supported in the Local Policies Plan. They refer to the text that Lisburn City has a</p>	<p>The Housing Requirements are detailed under Chapter 4 of the draft Plan Strategy which includes the Strategic Housing Allocation and the approach to housing allocation. The issues regarding the settlements have been robustly assessed by the Council including the RDS</p>

<p>high level of services and facilities, and the Waste-Water Treatment Works have remaining capacity. They agree that the Plan should focus major population and economic growth in Lisburn City. They also refer to Lisburn Greater Urban Area and disagree with the comment that this area has limited scope for new development and they would like to see this area expanded. They also note that the Council focus for new housing appears to be concentrated at the Blaris Lands. The Representation argues that further growth should be directed to more suitable areas including south Lisburn and refer to the Lisburn Southern Relief Road including Hillhall Road to Saintfield Road proposals.</p>	<p>Housing Growth Indicators, use of the RDS Housing Evaluation Framework, allowance for existing housing commitments, urban capacity study, allowance for windfall housing and the NIHE Housing Needs Assessment. Further detail is provided in Technical Supplement 1 -Housing Growth Study, Technical Supplement 2 – Urban Capacity Study and Technical Supplement 6 – Countryside Assessment which includes Settlement Appraisals.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>
<p>Gravis Planning on behalf of Conway Estates Ltd refers to Appendix D Evaluation of Settlement Characteristics with their emphasis on Carryduff. The Appendix states that Carryduff has sufficient land remaining for housing and other uses and no additional land is required to meet these requirements. The Representation disagrees and also states that Carryduff should have an increased housing growth allocation compared to the other towns mentioned as the town is an attractive place to live for people working in Belfast and other areas.</p> <p>The representation also refers to the Waste Water Treatment Capacity as identified in the section and they state that it is vital that the Department for Infrastructure and the Department for Finance develop options on how to provide good governance and financing solutions for Water security in NI by engaging with Industry Experts. Without addressing the NI Water capacity issues, housing delivery will cease.</p>	<p>The Housing Requirements are detailed under Chapter 4 of the draft Plan Strategy which includes the Strategic Housing Allocation and the approach to housing allocation. The issues regarding the settlements have been robustly assessed by the Council including the RDS Housing Growth Indicators, use of the RDS housing evaluation framework, allowance for existing housing commitments, urban capacity study, allowance for windfall housing and the NIHE Housing Needs Assessment. Further detail is provided in Technical Supplement 1 -Housing Growth Study, Technical Supplement 2 – Urban Capacity Study and Technical Supplement 6 – Countryside Assessment which includes Settlement Appraisals.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p> <p>The Council will continue to work with NI Water and DfI to help inform NI Water’s business planning, which aims to address future water and waste-water needs.</p> <p>DfI understands that NI Water will also continue to help manage this issue by working closely with the Council, to help facilitate development, where possible.</p>
<p>Gravis Planning on behalf of Fraser Houses Ltd refers to Appendix D Evaluation of Settlement Characteristics with their emphasis on</p>	<p>The Housing Requirements are detailed under Chapter 4 of the draft Plan Strategy which includes the Strategic Housing Allocation and</p>

<p>Carryduff. The Appendix states that Carryduff has sufficient land remaining for housing and other uses and no additional land is required to meet these requirements. The Representation disagrees and also states that Carryduff should have an increased housing growth allocation compared to the other towns mentioned as the town is an attractive place to live for people working in Belfast and other areas.</p> <p>The Representation also refers to the Waste Water Treatment Capacity as identified in the section and they state that it is vital that the Department for Infrastructure and the Department for Finance develop options on how to provide good governance and financing solutions for Water security in NI by engaging with Industry Experts. Without addressing the NI Water capacity issues, housing delivery will cease.</p>	<p>the approach to housing allocation. The issues regarding the settlements have been robustly assessed by the Council including the RDS Housing Growth Indicators, use of the RDS housing evaluation framework, allowance for existing housing commitments, urban capacity study, allowance for windfall housing and the NIHE Housing Needs Assessment. Further detail is provided in Technical Supplement 1 -Housing Growth Study, Technical Supplement 2 – Urban Capacity Study and Technical Supplement 6 – Countryside Assessment which includes Settlement Appraisals.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p> <p>The Council will continue to work with NI Water and DfI to help inform NI Water’s business planning, which aims to address future water and waste-water needs.</p> <p>DfI understands that NI Water will also continue to help manage this issue by working closely with the Council, to help facilitate development, where possible.</p>
<p>Gravis Planning on behalf of Fraser Houses refers to Appendix D Evaluation of Settlement Characteristics with their emphasis on Crossnacreevy. They refer to the text that small settlements act as a focal point for the rural community where consolidation of the built form can provide opportunity for individual dwellings and/or small groups of houses and small rural businesses. It is encouraging that small settlements have been identified as suitable locations for new residential development.</p>	<p>The Council notes the comments.</p>

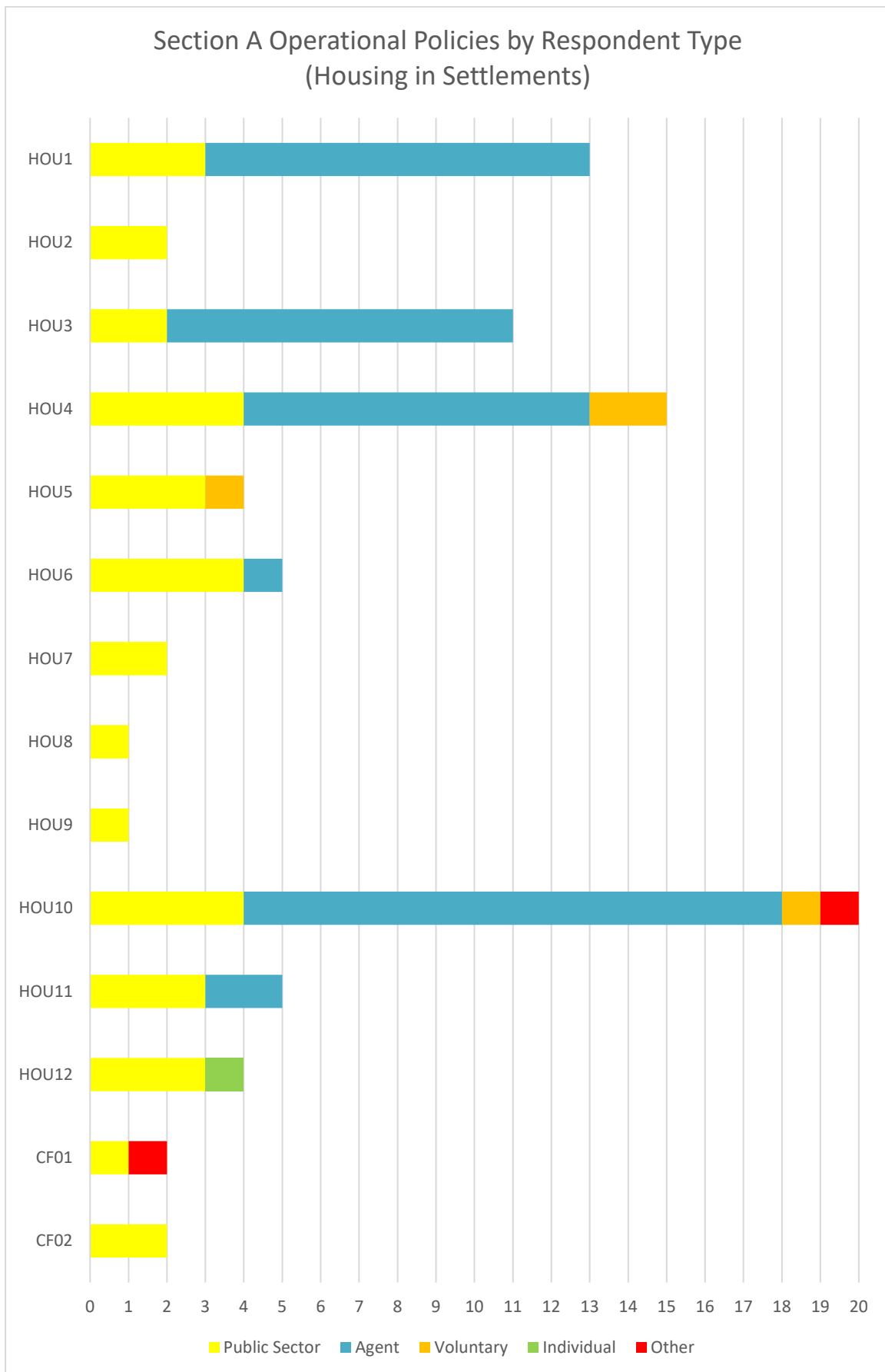


<p>Gravis Planning on behalf of Fraser Houses refers to Appendix D Evaluation of Settlement Characteristics with their emphasis on Castlereagh Greater Urban Area at Dundonald referring to the comments on the Waste-Water Treatment Works. They acknowledge that the Castlereagh Greater Urban Areas act as main service centres and that growth will be focused on these areas based on existing facilities, infrastructure and their strategic location on the transport corridors.</p>	<p>The Council notes the comments.</p>
<p>Turley on behalf of Plantation Landowner Group refers to Appendix D Evaluation of Settlement Characteristics, with each of the settlements classified in the Settlement Hierarchy, information on population, role and function, existing infrastructure provision and future potential. This analysis appears to have been informed by the information and analysis in Technical Supplement 6: Countryside Assessment, which at Part 4 sets out Settlement Appraisals for Lisburn, the three towns, thirteen villages and thirty-three small settlements. The argument is that the Strategic Housing Allocation in the draft Plan Strategy does not appear to use the settlement appraisal evaluation to set a housing allocation for any tier of the settlement hierarchy or any individual settlement using the Housing Evaluation Framework Methodology.</p> <p>A strategic case has been developed for inclusion of housing land at Plantation area of Lisburn City referring to Appendix D Evaluation of Settlement Characteristics.</p>	<p>The Housing Requirements are detailed under Chapter 4 of the draft Plan Strategy which includes the Strategic Housing Allocation and the approach to housing allocation. The issues regarding the settlements have been robustly assessed by the Council including the RDS Housing Growth Indicators, use of the RDS housing evaluation framework, allowance for existing housing commitments, urban capacity study, allowance for windfall housing and the NIHE Housing Needs Assessment. Further detail is provided in Technical Supplement 1 -Housing Growth Study, Technical Supplement 2 – Urban Capacity Study and Technical Supplement 6 – Countryside Assessment which includes Settlement Appraisals.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p>
<p>DfI welcomes Appendix D Evaluation of Settlement Characteristics as it sets out where the Council plans to focus major population and economic growth and also stresses the need to examine the existing sewerage infrastructure when considering future growth. The level of detail included is also welcomed as it details the Waste-Water Treatment Works in the council area, the level of available capacity and where network issues exist. The level of detail provided demonstrates a close working relationship between the Council and NI Water going forward. This approach will also help to inform NI Water’s business planning, which aims to address future water and waste-water needs.</p>	<p>The Council welcomes the comments and will continue to work with NI Water and DfI to help inform NI Water’s business planning, which aims to address future water and waste-water needs.</p>

<p>The Department understands that NI Water will also continue to help manage this issue by working closely with the Council, to help facilitate development, where possible.</p>	
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## **PART 2 OPERATIONAL POLICIES**

**A: A QUALITY PLACE**



## 1. HOUSING IN SETTLEMENTS

### Operational Policy HOU1 New Residential Development

There were thirteen representations received in respect of Operational Policy HOU1 New Residential Development.

#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-039	Inaltus Limited on behalf of O'Kane Property Ltd
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-083	Agent
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-109	Department for Infrastructure (DfI)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports Policy HOU1 which operates a presumption in favour of housing within settlements on land zoned for residential use, brownfield land and Living over the Shop schemes within designated city and town centres, or as part of mixed use development.	The Council welcomes the supportive comment.
Inaltus Limited on behalf of O'Kane Property Ltd states that Policy HOU1 provides three overly prescriptive criteria for future housing lands. It should include the word "normally" to allow for exceptions to this policy. This policy will raise issues for development of housing on whiteland sites. The policy suggests housing can be built in designated small settlements. It should be confirmed that this policy allows for all lands in small settlements to be suitable for housing subject to other general policy compliance.	The Council notes the comment. This policy defines areas within settlements where housing is accepted and appropriate. The Council considers the inclusion of the word 'normally' offers no benefit. Whiteland has no definition in the dPS, it is merely land that is not zoned for a particular use. Such whiteland would include those lands contained in HOU1(b) and in some instances HOU1(c) and (d). Additionally Policy HOU8 deals with redevelopment and infilling proposals in established residential areas. That being said, the Council accepts that HOU1 criteria c) (dPS Part 2, page 12) could benefit from clarification. The Council proposes for clarity, as a minor change, to amend criteria c) of Policy HOU1, page 12, as follows: "c) in designated city and town centres,

	<p><i>and within settlement development limits of the city, towns, greater urban areas, villages and small settlements.”</i></p> <p>(Ref: MC12 Minor Changes Schedule)</p>
<p>NIEA welcomes Policy HOU1 that new residential development will be concentrated within urban areas and areas zoned for housing. However, natural heritage worthy of protection may still be found within the urban landscape and also the greenfield sites zoned for housing. Brownfield sites may contain biodiversity in the form of open mosaic habitat.</p>	<p>The Council notes the comments. Issues concerning natural heritage are addressed under specific operational policies NH1-NH6.</p> <p>As stated in the Preamble on page 3, all other relevant operational policies apply to development proposals and no policy will be read in isolation from one another.</p>
<p>Gravis Planning on behalf of MRP Investment &amp; Development Ltd; Conway Estates Ltd; and, Fraser Houses Ltd, are generally supportive of Policy HOU1, although consider that criteria (c) should be amended to read ‘main towns’ rather than ‘town centres’ as the policy as written is currently too restrictive limiting the location of housing developments within town centres only. Housing growth should be promoted within the locality of the main towns in order to maintain growth.</p>	<p>The Council agrees that the wording of Policy HOU1 criteria c) is unclear (see also Council consideration for DPS-039 Inaltus Limited on behalf of O’Kane Property Ltd). The Council proposes for clarity, as a minor change, to amend criteria c) of Policy HOU1, page 12, as follows:</p> <p>“c) in designated city and town centres, <i>and within settlement development limits of the city, towns, greater urban areas, villages and small settlements.”</i></p> <p>(Ref: MC12 Minor Changes Schedule)</p>
<p>Gravis Planning on behalf of Killultagh and an individual, support Policy HOU1, specifically criteria (c) in that planning permission will be granted for new residential development in villages.</p>	<p>The Council notes the comment in relation to villages. Please also note the proposed minor change to criteria HOU1 c) above.</p>
<p>Gravis Planning on behalf of Hillmark Homes generally support Policy HOU1, although consider that criteria (c) should include Greater Urban Areas as locations for new residential development. As the policy as written it is currently too restrictive limiting the location of housing developments.</p>	<p>The Council notes that Greater Urban Areas have been excluded from the policy. Please note the proposed minor change to HOU1 criteria c) above which will encompass the Greater Urban Areas when applying the policy. The J&amp;A also states that ‘the Council will accommodate new residential development in appropriate locations within settlement limits in accordance with this policy’.</p>
<p>Gravis Planning on behalf of Fraser Houses Ltd (DPS-088) support Policy HOU1, specifically criteria (c). It is encouraging that small settlements have been identified as suitable locations for new residential development.</p>	<p>The Council notes the comment in relation to small settlements. Please note the proposed minor change to criteria c) above.</p>
<p>A Planning Agent refers to Policy HOU1 in the J&amp;A stating that ‘the Council encourages residential development in city and town centres’ and indicates that the reasons for doing so include environmental sustainability, using existing infrastructure, and encourage walking, cycling and use of public transport. West Lisburn Strategic site will be the largest</p>	<p>The Council notes the comments and agrees the policy encourages and supports sustainable housing within city and town centres. The Council however disagrees that the West Lisburn/Blaris Strategic Mixed Use Site (SMU01, page 78, Part 1 of dPS) is not a sustainable location, being a strategic site within the existing settlement development limits. As part</p>

<p>housing zoning in the Council area and it is not in a sustainable location, will not make use of existing infrastructure and will require new infrastructure.</p> <p>The representation also refers to new residential development being acceptable on brownfield land within the policy but the glossary definition of brownfield land excludes the gardens of dwellings and apartments. Changing planning policy becomes more restrictive over time so once where gardens of houses were deemed to be 'brownfield' land the policy has changed to exclude those from the definition.</p>	<p>of the development of SMU01 the Council sets out key site requirements (KSRs) which support the sustainability of the site including development of additional public transport and other infrastructure (See Council consideration under SMU01 for details).</p> <p>The Council notes the comments. The exclusion of residential gardens from being classified as brownfield land stems from the Regional Development Strategy (RDS) 2035 (page 106) and paragraph 2.8 of PPS 7 (Addendum) Safeguarding the Character of Established Residential Areas which excludes from the definition 'the gardens of dwellings and apartments (broadly defined as those areas within the curtilage of a dwelling not containing buildings)'. The Council's LDP in accordance with Consistency Test C1 and C3 takes account of the strategic guidance of the RDS and regional policy, and therefore residential gardens are excluded from that definition.</p>
<p>Dfl notes the provisions of HOU1 which permit new residential development in settlements on land zoned for residential use; previously developed / brownfield land; in designated city and town centres, villages and small settlements; and living over the shop. The policy does not reflect mixed use zonings, for example that are indicated at SMU01. The Council should consider the relationship between this policy and SMU01 and any other strategic mixed-use zonings.</p> <p>In relation to the proposal to encourage residential development in designated city and town centres, clarification is sought on the relationship to TC1 Town Centre, Retailing and Other Uses specifically in relation to the impact on the role and function of designated city/town centres.</p>	<p>The Council notes the comment. Mixed use development is referred to in the last sentence of the J&amp;A, however the Council accepts it would be beneficial to include it within the policy. The Council proposes for clarity, as a focussed change, to amend Policy HOU1 criteria b), page 12, as follows:  <i>"(b) on previously developed land (brownfield sites) or as part of mixed-use development."</i>  <a href="#">(Ref: FC4 Focussed Changes Schedule)</a></p> <p>The Council notes the comments and clarification sought on the relationship with Policy TC1. Policy TC1 refers to the provision of retailing and other town centre uses and the sequential approach to their provision. There is no direct correlation between HOU1 and TC1 in terms of encouraging housing provision ahead of other town centre uses. Whilst Policy HOU1 and its J&amp;A recognises the importance of housing aiding the revitalisation of town centres, TC1 protects the primary retail and other town centre uses and therefore applications are considered on their own merits in accordance with all relevant operational policies.</p>

## Operational Policy HOU2 Protection of Land Zoned for Housing

There were two representations received in respect of Operational Policy HOU2 Protection of Land Zoned for Housing.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports Policy HOU2 to protect land zoned for housing.	The Council welcomes the supportive comment.
Dfi acknowledges this policy supports provisions in relation to the protection of land zoned for housing. It is noted that in all cases proposed alternative uses must comply with requirements of Policy HOU4 to ensure there are no detrimental impacts on the privacy or amenity of existing or proposed residential properties. However, HOU4 relates to design in new residential development. Is the intention to apply this policy to non-residential development as it applies to design in new residential development?	<p>The Council notes the comment. This is a protective policy, allowing only limited alternative uses compatible with housing. A number of the design criteria outlined under Policy HOU4 are applicable to alternative uses which is explained in the last paragraph of the J&amp;A to HOU2.</p> <p>The Council proposes for clarity, as a focussed change, to include reference to HOU2 in the first paragraph of the J&amp;A of Policy HOU4, page 15, second sentence, as follows:</p> <p><i>“This Policy will apply to those alternative uses which are deemed to be acceptable under Policy HOU2.”</i></p> <p><i>(Ref: FC5A Focussed Changes Schedule)</i></p>



## Operational Policy HOU3 Site Context and Characteristics of New Residential Development

There were eleven representations received in respect of Operational Policy HOU3 Site Context and Characteristics of New Residential Development.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-083	Agent
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>NIHE supports Policy HOU3 but would like some clarity that size standards/density should be applied to all housing not just new residential development in Conservation Areas, and Areas of Townscape or Village Character.</p>	<p>The Council notes the comment and can confirm that Policy HOU4 criteria d) stipulates the density bands which should be applied to all development across the Council area. Reference to density and space standards is emphasised in the last paragraph of Policy HOU3, to further reinforce that all new residential development in particular within areas of distinctive townscape character will be subject to these requirements. Density and space standards are further elaborated upon in Policy HOU4 and its J&amp;A.</p>
<p>NIHE agree that individual and cumulative effects of development should be taken into account in the determination of planning applications. They also believe there is opportunity to include a statement that limited weight will be given to precedence.</p>	<p>The Council notes the comment however in terms of precedence all planning applications received should be assessed individually against the site context and characteristics and cumulatively with surrounding development. The Council does not consider it necessary to alter the policy or J&amp;A text.</p>
<p>NIHE support the policy that all residential development should be accompanied by an overall design concept in accordance with Policy HOU6.</p>	<p>The Council welcomes the supportive comment.</p>
<p>NIEA consider it is positive that new residential housing will be appropriate to the</p>	<p>The Council notes the comments. HOU3 takes account of the SPPS, which supports and</p>

<p>character/topography. However, in criteria (b) they note issue with the words “where appropriate” and would prefer consideration of the words “<i>appropriately protected and integrated</i>”. This would encourage developers to protect and integrate distinctive landscape features into designs, as opposed to deeming features inappropriate for a design/layout and ultimately destroying the feature.</p>	<p>promotes sustainable development in its regional strategic objectives for both the built and natural environment. The Council is of the opinion that altering the wording as suggested does not alter the thrust of the policy and considers retaining the word “where” in the policy is appropriate.</p>
<p>NIEA recommends on page 13, paragraph 1 that the term ‘local character’ be amended to ‘landscape character’.</p> <p>At page 14 of the J&amp;A it is recommended that the following sentence be added:- "The use of Tree Preservation Orders or Retention Conditions will be considered in the interests of visual amenity and landscape character."</p> <p>Within the J&amp;A, under the heading Site Characteristics, 1st paragraph, 2<sup>nd</sup> sentence, page14, should be amended to "These include topography, existing buildings, features of the archaeological or historic environment and landscape features such as rivers, streams, trees and hedgerows, which make an important contribution to the amenity and biodiversity of an area."</p> <p>An additional line should be added as follows:- "There will be a presumption in favour of the retention of trees and boundary hedgerows within ATCs/AVCs."</p>	<p>The Council notes the comment but intends to leave the wording as ‘local character’ as its intention, and that of the policy, covers more than just the local landscape.</p> <p>The Council notes the comment and the intended use of the additional text, however trees of merit can be afforded TPO protection through the legislative means of the Planning Act (NI) 2011. It is not considered necessary to add this additional text to the J&amp;A. The use of planning conditions for the protection of those trees worthy of retention, and not covered by a TPO, are standard practice where it is the decision to approve a development proposal.</p> <p>The Council notes the comment. The suggested additional text regarding ‘amenity’ is not considered necessary. The purpose of the policy is to integrate new residential development within the context of the existing site and its surroundings. The layout, design and retention of landscaping features creates the amenity value and these aspects are sufficiently covered within the J&amp;A.</p> <p>The Council notes the comment and considers this issue to be covered under Policy HE10 criteria e).</p>
<p>Gravis Planning on behalf of MRP Investment &amp; Development Ltd: Killultagh; an individual; Hillmark Homes; Conway Estates; and, Fraser Houses Ltd supports Policy HOU3 as it is important to provide attractive and sustainable residential development with a high quality of design, layout and landscaping. Each proposal for residential development should be based on a clear design concept.</p>	<p>The Council welcomes the supportive comments.</p>
<p>A Planning Agent refers to Policy HOU3 requiring new residential development to respect the surrounding context and</p>	<p>The density bands included within criteria d) of Policy HOU4 are based on the existing character and analysis of the urban areas</p>

<p>appropriate to the character of the site. Criteria (a) requires development to respect the surrounding context. This does not complement criteria (d) of Policy HOU4 (density bands) and creates tension between the two policies.</p>	<p>identified in the Council's Urban Capacity Study (see Technical Supplement 2 of the draft Plan Strategy). As these density bands reflect the character of the existing areas, the Council does not see a tension between Policy HOU3 criteria a) requiring to respect surrounding context as this is a wider consideration taking into account other factors, not just density requirements.</p>
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## Operational Policy HOU4 Design in New Residential Development

There were fifteen representations received in respect of Operational Policy HOU4 Design in New Residential Development.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-041	Belfast City Council
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-083	Agent
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-090	Dundonald Green Belt Association
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>NIHE supports Policy HOU4 but would like some clarity around adaptable homes. They would like to see explicit statements that all new homes should be required to be developed to Lifetime Homes Standards and that a proportion should be wheelchair standard.</p> <p>NIHE welcome the design criteria in relation to landscaping and private open space, sustainable drainage, energy efficient homes, support for walking and cycling initiatives, design that deters crime etc.</p>	<p>The Council notes the comment. Policy HOU4 does state under criteria (e) that a range of dwellings should be proposed that are 'accessible and adaptable' in their design to provide an appropriate standard for all. This is again expanded upon in the J&amp;A under Adaptable Accommodation. The Council is of the opinion that to expand on what is already indicated in its policy would be overly prescriptive.</p> <p>The Council welcomes the supportive comment.</p>
<p>Belfast City Council refers to HOU4 in relation to adaptable housing identified in criteria (e) of the policy. 'A range of dwellings should be proposed that are accessible and adaptable in their design to provide an appropriate standard of access for all.' Further, under the J&amp;A section it is stated that 'Design standards should be</p>	<p>The Council notes that a joined up approach in relation to lifetime homes had not been agreed as a consequence of any discussion with Belfast City Council either through the Metropolitan Area Spatial Working Group, or the Council's own neighbouring Council engagement. The Council notes Belfast's equivalent policy in its</p>

<p>incorporated to provide for Lifetime Homes which meet the varying needs of occupiers and are easily capable of accommodating adaptations.’ This differs to Belfast’s approach in respect of the thresholds applied, and therefore requires close monitoring of any future effects across the wider housing market area.</p> <p>Belfast City Council also refer to criteria (d) density and state that the proposed 25-35 dwellings per hectare proposed within Town Centres and Greater Urban Areas are at odds with the SPPS requirement to promote higher density housing developments in town and city centres and in other locations that benefit from high accessibility to public transport facilities. Increasing the density in appropriate locations would reduce the requirements for unsustainable greenfield land in areas such as the 50ha of land at Blaris/West Lisburn.</p>	<p>draft Plan Strategy on page 75 which states: <i>“HOU7 – Adaptable and accessible accommodation: All new homes should be designed in a flexible way to ensure that housing is adaptable throughout all stages of life, maximising the ability for occupants to remain in their homes and live independent lives for as long as possible”</i> in addition to the policy requirement for 10% of all residential developments of 10 units or more, to be wheelchair accessible.</p> <p>This Council considers its policy as written will deliver a range of dwellings which will be accessible and adaptable. However, the Council confirms it will monitor this situation and its effects on the wider housing market area and consider if any revision is necessary at the Local Policies Plan stage.</p> <p>The Council notes the comments. The density bands included within criteria d) of the policy are based on the existing character and analysis of the urban areas, identified in the Council’s Urban Capacity Study (see Technical Supplement 2 of the draft Plan Strategy). The Council therefore contends that the density bands proposed are reflective of what already exists and the policy is not at odds with the SPPS in relation to its regional strategic policy paragraph 6.137 “Increased housing density without town cramming” which specifically states that houses will respect local character and environmental quality as well as safeguarding the amenity of residents. Further comment is provided in relation to the strategic housing allocation at West Lisburn/Blaris under Strategic Policy SMU01.</p>
<p>NIEA considers it positive that the Council is specifying that indigenous plant species are to be used within landscaped areas, this would be beneficial to biodiversity throughout the Council area.</p> <p>Within the J&amp;A under Landscaping and Private Open Space it states that the greening of spaces assists in the promotion of biodiversity. It would be advantageous to increasing biodiversity if an additional criteria point was added to the policy which specifically addressed the need to increase biodiversity within new residential developments.</p>	<p>The Council welcomes the supportive comment regarding the use of indigenous plant species.</p> <p>The Council notes the suggested amendment to the policy to increase biodiversity. The purpose of part b) of this policy is to provide appropriate private open space within new developments and as outlined in the J&amp;A, this will assist in the promotion of biodiversity. The policy requirements will enhance and create further</p>

	opportunities for biodiversity and it is not considered necessary to repeat this in policy.
<p>NIEA notes within the J&amp;A Sustainable Drainage (SuDS) are to be favorably considered. NIEA welcomes this approach but would have preferred an intention to bring forward policy to require the use of Sustainable Drainage Systems (SuDS) in new developments, as has been proposed in other local authority draft plans. SuDS can be beneficial to biodiversity as permeable surfaces can reduce the likelihood of flooding, which can be negative to biodiversity.</p> <p>Development should not create or exacerbate environmental pollution or damage. New residential development should clearly require that there is reference to 'phasing of housing' to correlate with sufficient WWTW infrastructure capacity availability to meet any projected discharge.</p> <p>Neither Strategic Policy 08 Housing in Settlements (Part 1 LDP) nor Policies HOU1 - HOU12 identify nor explain how lack of capacity at Wastewater Treatment Works within the City Council area will be dealt with.</p> <p>NIEA recommends that an additional design criteria is made to HOU4:-</p> <p>m) Sufficient amenity distance in terms of proximity of dwellings to existing mature trees should be designed into the layout. This will depend on the nature of the species in question and appropriate advice should be sought.</p> <p>NIEA refers to Landscaping and Private Open Space, page 16, 2nd paragraph, line 10 and would recommend amending the term 'generally of indigenous species' to 'of native species'.</p>	<p>The Council welcomes the supportive comments on SuDS. The use of SuDS is encouraged but the Council acknowledges this is not a mandatory requirement. The Council welcomes further guidance from the Department on how future development plan zonings can incorporate SuDS and how these would be implemented, managed and maintained, given that the Council is advised by NI Water that currently only 'hard' SuDS solutions will be adopted.</p> <p>NI Water is consulted by the Council when it is developing its LDP to ensure both parties know the current and future demand for treatment works in order to meet the requirements of the Council's growth strategy. Additionally, in most cases where planning applications are submitted, NI Water are consulted and their view sought in relation to the availability to meet any projected discharge. A lack of capacity at WWTWs is kept under constant review in consultation with statutory consultees to ensure that planned development can be met (see Appendix H).</p> <p>The Council notes the comment and acknowledges the importance of mature trees in relation to site layout of housing. This policy seeks the retention of existing landscape features where possible, and if not, compensatory planting is required. The J&amp;A on page 16 refers to existing landscape features including the retention and integration of trees within development proposals. Additionally it is a requirement of Policy HOU3 to identify and where appropriate protect and integrate landscape features into a proposal. The Council considers the policy as written, is sufficient in order to protect those trees worthy of protection.</p> <p>The Council notes the suggested amended wording. The words 'indigenous' and 'native' effectively have the same meaning. Changing the wording is therefore not considered necessary.</p>

<p>Gravis Planning on behalf of MRP Investment &amp; Development Ltd; Killultagh; an individual; Hillmark Homes; Conway Estates Ltd; and, Fraser Houses Ltd generally support Policy HOU4 with the exception of criteria (d) and (e). In regard to criteria (d) prescriptive density bands should not be set within policy given that density should take into account local context, design, residential quality and transport links. The proposed density bands could be used as a guide within supplementary planning guidance. These density bands can limit the development potential of proposals.</p> <p>In regard to criteria (e) although offering support to the Lifetime Homes approach, this should not be a planning requirement. In England for example, the Lifetime Homes was once a planning requirement, however, it has been abolished and built into updated Building Regulations. The same approach should be taken here with Northern Ireland.</p> <p>Lifetime Homes would create yet another design challenge at planning application stage which may not be achievable on all sites.</p> <p>Suggest removal of reference to density bands and lifetime homes as planning requirement and better brought forward under building regulations.</p>	<p>The Council notes the comments. The density bands included within criteria d) of the policy are based on the existing character and analysis of the urban areas, identified in the Council’s Urban Capacity Study (see Technical Supplement 2 of the draft Plan Strategy). The Council therefore contends that the density bands proposed are in accordance with the approach of the SPPS in relation to its regional strategic policy paragraph 6.137 “Increased housing density without town cramming” which specifically states that houses will respect local character and environmental quality as well as safeguarding the amenity of residents.</p> <p>Criteria (e) of the policy requires a range of dwellings to be accessible and adaptable in their design to provide an appropriate standard of access for all. The J&amp;A refers to ‘Lifetime Homes’ to ensure a range of dwellings are proposed that are capable of meeting the diverse needs across the general population. It is a matter for the applicant to demonstrate how their proposal complies with the relevant policy and appropriate standards contained within existing Building Control Regulations. The Council considers the policy will help deliver a range of dwellings which will be accessible and adaptable.</p> <p>The Council proposes for clarity, as a minor change, to amend the second sentence of criteria e) of Policy HOU4, page 15, as follows: “The design of dwellings should ensure they are capable of adaption to provide accommodation that is wheelchair <del>useable</del> <i>accessible</i> for those in society who are mobility impaired.” (Ref: MC13 Minor Changes Schedule)</p>
<p>A Planning Agent refers to criteria (d) of the policy and its relationship to deliverability of housing numbers on existing sites. Criteria (d) sets out the aspirational density of development bands which the Council wishes to achieve.</p> <ul style="list-style-type: none"> <li>• City Centre Boundary 120-160 dwellings per hectare</li> <li>• Town Centres and Greater Urban Areas 25-35 dwellings per hectare; and</li> <li>• Villages and small settlements 20-25 dwellings per hectare</li> </ul>	<p>The Council notes the comment and considers the issue concerns the policy wording. The Council proposes for clarity, as a focussed change, to amend criteria d) of Policy HOU4, page 15, as follows: “d) residential development should be brought forward in line with the following density bands:</p> <ul style="list-style-type: none"> <li>• City Centre boundary 120-160 dwellings per hectare</li> <li>• <i>Settlement Development Limits of the City, Towns Centres and G</i>reater <i>U</i>rban <i>A</i>reas 25-35 dwellings per hectare</li> </ul>

<p>There is no provision for areas that are within the settlement limit of towns but outside their town centres and outside the greater urban areas.</p> <p>They also identify that the proposed density of the proposed Strategic Mixed Use Site at West Lisburn/Blaris (SMU01) does not match Policy HOU4 density parameters. Within the J&amp;A of this policy, page 17, is a requirement that new residential development should incorporate design standards that provide for 'Lifetime Homes'. In practice adoption of Lifetime Homes standards across a development will reduce the densities achievable for housing development and making the densities in the policy impossible to meet. Lifetime Homes require wider dwellings, and plots to accommodate wheelchair users, it also requires reduced gradients that in turn require additional engineering works all of which acts to reduce residential density, particularly on sloping land.</p>	<ul style="list-style-type: none"> <li>• <i>Settlement Development Limits of Villages and Small Settlements 20-25 dwellings per hectare</i>" (Ref: FC5B Focussed Changes Schedule)</li> </ul> <p>Policy HOU1 and HOU4 encourage housing within the existing settlement development limits subject to meeting other policy requirements. The dwellings allocated at West Lisburn/Blaris is calculated on the density and size of the developable area for housing (approx. 30 dph). Further detail is provided under Strategic Policy SMU01 West Lisburn/Blaris.</p> <p>The Council notes the comment in relation to Lifetime Homes and refers to its response to Gravis Planning who also raise this matter (see Council consideration provided above).</p>
<p>Dundonald Green Belt Association refers to density. Applying 120 dwellings per hectare for Lisburn City and 25 dwellings per hectare across the rest of the urban area takes insufficient account of urban variation. It is noted that 25 is well beneath the 40 density per hectare required for efficient urban functioning.</p>	<p>The density bands included within criteria d) of the policy are based on the existing character and analysis of the urban areas, identified in the Council's Urban Capacity Study (see Technical Supplement 2 of the draft Plan Strategy). The Council therefore contends that the density bands proposed are in accordance with the approach of the SPPS in relation to its regional strategic policy paragraph 6.137 "Increased housing density without town cramming" which specifically states that houses will respect local character and environmental quality as well as safeguarding the amenity of residents.</p> <p>All planning applications received are assessed individually against their site context and characteristics (Operational Policy HOU3). This will vary on a case-by-case basis and as such will be a material consideration for each development proposal.</p>
<p>RSPB NI welcomes the requirements for landscaping and private open space; they are not however sufficiently ambitious to deliver on the Council's requirement of furthering sustainable development and are not equally applicable in all contexts. In simple terms, the requirements essentially represent a 'business as usual approach', and from studies like the</p>	<p>The Council notes the comments and contends its policies for housing (in settlements) requires applicants to design schemes that are sensitive to natural heritage (Policies HOU3, HOU4 and HOU5). This is further promoted through operational policies NH2 and NH5. Development proposals are also subject, where necessary, to consultation with NIEA (Northern</p>



<p>State of Nature, we know that a 'business as usual' approach is insufficient to address the impacts of development in general on our species and habitats, through for example habitat loss, fragmentation, and pollution etc.</p> <p>RSPB NI believes that the protection and enhancement of both urban and rural biodiversity can be achieved through careful planning and development. To achieve this, RSPB NI believes that any development/redevelopment proposals should aim to protect and enhance biodiversity on sites and connections between ecological features within and across sites.</p> <p>RSPB NI previously advocated a number of points on this topic in its response to the POP Against this context, an additional criterion 'm)' requiring biodiversity net gain to be incorporated into the design and layout as part of a development proposal within Policy HOU4 would help to address the fact that NI is failing to meet its targets on halting biodiversity loss (as contained within the NI Biodiversity Strategy, EU Biodiversity Strategy, and Aichi Targets), which are reflected in the regional planning documents of the RDS and SPPS).</p>	<p>Ireland Environment Agency) through the use of biodiversity checklists. The Council does not therefore intend to add the suggested additional criteria. Points previously raised in the response to the POP have been addressed either through this policy or its J&amp;A.</p> <p>The Council considers that its suite of operational policies, particularly those in relation to natural heritage, adequately address biodiversity issues.</p>
<p>DfI notes the provisions of HOU4 reflect some of the existing policy set out in QD1 'Quality in New Residential Development', and also introduce additional requirements in respect of accessible and adaptable design; energy and resource efficiency; electric vehicle charging points etc. Clarification is sought on how a range of dwelling types and designs can prevent social exclusion.</p> <p>Furthermore Criteria (e) appears to require the design of all dwellings to be capable of adaption to provide accommodation that is wheelchair useable, and clarification would be welcomed particularly whether it relates solely to access to dwellings or requires dwellings to be capable of modification for occupation by wheelchair users. Clarification on how this would apply in practice would be welcomed.</p>	<p>The Council considers a range of dwelling types will facilitate a mixture of households to access the housing market (either through the purchase or renting of properties) and also create better opportunities for 'tenure blind' design which supports sustainable communities. The policy supports a wider variety of households and household formations. It will give a sense of place and community, and considered, as a result, will assist in lessening the effects of social exclusion.</p> <p>Taking account of the above comments, the Council proposes for clarity, as a minor change, to amend the second sentence of criteria (e) of Policy HOU4, page 15, as follows:  "The design of dwellings should ensure they are capable of adaption to provide accommodation that is wheelchair <i>useable accessible</i> for those in society who are mobility impaired."  (Ref: MC13 Minor Changes Schedule)</p>

DfI, Water and Drainage Policy Division, refers to the J&A, page 16, subheading 'Landscaping and Private Open Space'. The wording makes reference to the 'greening' of spaces. Consideration should be given to 'Blue-Greening' open spaces to make room for blue/green infrastructure.

Also in the J&A, page 18, subheading 'Sustainable Drainage'. The focus seems to be only on hard permeable surfaces. It would be encouraging to see this developed here or within Policy HOU5 to provide an equal emphasis on green and blue SuDS e.g. swales, basins, green roofs, rain gardens etc, to provide a broader range of features that could be considered for integration into a development.

The Council notes the comments but does not consider the need to reference 'blue-greening' as the policy relates solely to landscaping and private open space (as opposed to public open space) to which the provision of blue infrastructure would not be considered appropriate (see Policy HOU5 in relation to public open space in new residential development).

The Council notes the comment and has responded to this point in its response to NIEA, please see above. The use of SuDS is encouraged but the Council acknowledges this is not a mandatory requirement. The Council welcomes further guidance from the Department on how future development plan zonings can incorporate SuDS and how these would be implemented, managed and maintained, given that the Council is advised by NI Water that currently only 'hard' SuDS solutions will be adopted.

## Operational Policy HOU5 Public Open Space in New Residential Development

There were four representations received in respect of Operational Policy HOU5 Public Open Space in New Residential Development.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports Policy HOU5 to provide good quality, accessible open space and to protect areas of open space in new residential development.	The Council welcomes the supportive comment.
<p>NIEA welcomes the provision of Green Space to link with Green and Blue Infrastructure. However, it would ideally like a specific criteria within this policy for natural heritage/biodiversity features to be retained and/or incorporated into a design and layout.</p> <p>At page 20: The 5th bullet point should be amended to:</p> <ul style="list-style-type: none"> <li>landscape and heritage features are retained <i>and adequately protected for the duration of all site works</i> and incorporated into the design and layout.</li> </ul>	<p>The Council notes the comments and suggests that the current wording goes further than just the retention of natural heritage, as it also includes reference to heritage features which includes the historic environment. This broad reference to landscape and heritage is considered to adequately address biodiversity features.</p> <p>The Council notes the request for the additional wording to the 5<sup>th</sup> bullet point on page 20 but does not consider it necessary to amend the policy. Only on those sites where development is likely to cause damage would the words 'and adequately protected for the duration of all site works' be applicable and in such cases these can form a condition(s) on the planning approval to ensure adequate protection measures are put in place for the duration of the site works.</p>
RSPB NI previously referred to the Kingsbrook development case study in England where the project objectives is to have 50% wildlife-friendly greenspace, excluding gardens. Against the background of climate change and biodiversity decline in urban areas by 56%, LCCC (like all other Councils) need to be more ambitious in setting targets for new public open space provision in new residential developments if it is to truly further sustainable	The Council notes the comments and reference to the planning objective for 50% open space in the referenced UK case study. Increasing the requirement to 50% provision for open space would impact on the projected housing growth figures for the Plan period. The effect of this could result in an increased need for additional lands to cater for the projected number of houses for the district's population, with greater resultant negative effects in terms of

<p>development (as laid down in the Planning Act 2011 and the SPPS), and comply with the statutory duty placed on every public body to further the conservation of biodiversity (as articulated by the WANE Act 2011). Notably, the SPPS at paragraph 6.171 goes on to state 'all of us share the collective responsibility to preserve and improve the natural environment and halt the loss of biodiversity for the benefits of future generations'. The preparation of the LDP presents the Council with a real opportunity to deliver on this responsibility, and be more ambitious in delivering for biodiversity, building resilience against the effects of climate change, and realising the full potential and value of ecosystems services (natural capital) for the Borough (economic, social and environmental).</p>	<p>sustainability and associated impacts on natural heritage. The Council is content that retaining the provision of open space, as noted in its policy, is more sustainable than the increase suggested by the respondent.</p> <p>The Council considers that its suite of operational policies, particularly those in relation to natural heritage, adequately address biodiversity issues.</p>
<p>DfI, Water and Drainage Policy Division, refers to policy HOU5 page 19, and its reference to Blue and Green Infrastructure – but only that 'provision must be made for open space that links with blue/green infrastructure where possible and provides pedestrian and cycle linkages to nearby public amenity spaces'. Could this be changed to include that 'adequate provision for blue green infrastructure must be made in public open space?'</p>	<p>The Council notes the comment in relation to blue/green infrastructure, and proposes for clarity, as a minor change, to amend paragraph 1 of the J&amp;A of Policy HOU5, page 20, as follows:</p> <p>"Public open space can be provided in a variety of forms ranging from village greens and small parks through to equipped play areas and sports pitches. In addition, the creation or retention of <i>blue/green infrastructure</i>, woodland areas, other natural or semi-natural areas of open space can provide valuable habitats for wildlife, promote biodiversity."</p> <p>(Ref: <a href="#">MC14 Minor Changes Schedule</a>)</p>

## Operational Policy HOU6 Design Concept Statements, Concept Masterplans and Comprehensive Planning

There were five representations received in respect of Operational Policy HOU6 Design Concept Statements, Concept Masterplans and Comprehensive Planning.

### Respondents

Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-072	Turley on behalf of Johncorp (No. 1) Ltd
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Armagh City, Banbridge and Craigavon Borough Council notes the reference to Planning Agreements under Operational Policy HOU6, however also notes the ambiguity as to the thresholds for when Section 76 agreements would be implemented, and in particular what constitutes “smaller developments”.	The Council notes the comment and acknowledges that Section 76 Planning Agreements as referred to in the J&A, mentions both major and smaller schemes. Strategic Policy SP07, Part 1, page 46 of the dPS indicates the circumstances where S76 Agreements may be entered into. The J&A on page 46 states <i>‘Planning agreements are provided for under Section 76 of the Planning Act and can be used to address issues to the granting of planning permission where these cannot be addressed through the use of appropriate planning conditions.’</i> In relation to thresholds, the Council considers that the Section 76 Framework document which is currently being developed jointly by a number of Councils will seek to further provide clarity on this issue.
NIHE supports Policy HOU6 for the requirement to submit Design Concept Statements and Concept Masterplans as part of a planning application for residential development.	The Council welcomes the supportive comment.
NIEA request an amendment to include an additional bullet point on page 21 to include: “an indication of how the landscape features are to be adequately retained and protected e.g.: -all mature trees should be protected in accordance with BS5837 2021 ‘Trees in relation to design, demolition and construction.’ They query Concept Masterplans (page 22) stating some developers may see this as a ‘green light’ to remove trees and other landscape features.’	The Council considers that the policy contains adequate protection of landscape and trees. A Design Concept statement is required to demonstrate how it meets the criteria of Operational Policies HOU3 (criteria b) refers specifically to ‘landscape features are identified and where appropriate protected and suitably integrated into the overall design and layout of the development’; and HOU4 (criteria b) refers to ‘landscaped areas using appropriate locally characteristic or indigenous species...’

	<p>A Concept Masterplan for major planning applications is required to address all the relevant matters set out in the policy and associated supplementary planning guidance. It is not considered necessary to amend the wording as suggested as this is already a requirement of the policy.</p>
<p>Turley on behalf of Johncorp Ltd notes that the requirement to submit a Design Concept Statement with all planning applications for residential development is consistent with the existing policy provisions of PPS7: Quality Residential Developments, Policy QD2. However, Policy HOU6 requires that a concept masterplan is provided for planning applications for 50 dwellings or more, or sites of 2 hectares or more in size. Council has failed to provide evidence to justify the departure from current thresholds as set out in Policy QD2 of PPS7 (300 no. dwellings or 15 hectares).</p> <p>It appears the Council has mixed the existing policy requirements of PPS 7 and the legislative requirements of the Planning Regulations and the GDO 2015 that require the submission of Design and Access Statements with Major planning applications for residential development (50. no units or 2. No hectares).</p> <p>In order to avoid conflict, it is suggested that draft Policy HOU6 is revised to reference the same thresholds as currently stipulated in PPS7, QD2.</p> <p>The Policy or J&amp;A should also be revised to reference the statutory requirement for Design and Access Statements to be submitted with planning applications for Major developments or where any part of the development is located within a designated area.</p>	<p>The Council notes the comments. The thresholds have been amended from those of PPS7 to align with the requirements of current legislation, including; the Planning (Development Management) Regulations (Northern Ireland) 2015 which describes in Regulation 2 and associated Schedule what a major residential development is comprised of; the Planning (General Development Procedure) Order 2015 which requires under Section 6(1)(a) a Design and Access Statement; and, the Planning Act (NI) 2011 which requires under Section 27(1) pre-application community consultation on a major development. A design and access statement and information to be presented at community consultations should effectively amount to that required in a design concept statement, submitted with a planning application. The Council, in accordance with paragraph 6.137, page 69 of the SPPS, considers this an appropriate policy that reflects the various legislative requirements as set out and does not therefore intend to amend the criteria to those outlined in Policy QD2 of PPS7.</p> <p>The Council notes the comment regarding the requirement for a design and access statement and considers it may be beneficial to also outline this separate legislative requirement. The Council proposes for clarity, as a minor change, to amend paragraph 1 of the J&amp;A of Policy HOU6, page 21, as follows:  <i>“A Design Concept Statement, or where appropriate a Concept Masterplan, will be required to support all proposals for residential development (outline and reserved matters/full applications) to show how a quality residential environment on a particular site will be delivered. A Design and Access Statement, may also be required for residential development in accordance with Section 6(1) of the Planning</i></p>

	<p><i>(General Development Procedure) Order (Northern Ireland) 2015.”</i></p> <p><i>(Ref: MC15 Minor Changes Schedule)</i></p>
<p>DfI notes the provisions of HOU6 reflect the approach of the SPPS and broadly reflect Policy QD 2 ‘Design Concept Statements, Concept Master Plans and Comprehensive Planning’ of PPS 7. It is noted that this policy differs from QD 2 in introducing different, lower thresholds in relation to the scale of planning applications for which a concept masterplan is required.</p>	<p>The Council notes the comments and, for clarification, refers to its response to the previous representation.</p>

## Operational Policy HOU7 Residential Extensions and Alterations

There were two representations received in respect of Operational Policy HOU7 Residential Extensions and Alterations.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports Policy HOU7 which can enhance flexibility, resilience, and endurance of a dwelling.	The Council welcomes the supportive comment.
NIEA consider the J&A, paragraph 6, Line 5 should be amended from "In other cases, where proposals impact on local landscape features compensatory planting to mitigate against the loss of local environmental quality and assist In the promotion of biodiversity will be necessary." to "In other cases, where proposals impact on local landscape features, <i>such as existing mature trees and other boundary vegetation</i> , compensatory planting to mitigate against the loss of local environmental quality and assist in the promotion of biodiversity will be necessary." This is suggested in order to reinforce the Importance of protecting and retaining mature trees where possible.	The Council notes the comment however is of the view that the policy as written provides sufficient protection for trees and vegetation which form a landscape feature, and therefore proposes no change to the J&A.



**Operational Policy HOU8 Protecting Local Character, Environmental Quality and Residential Amenity in Established Residential Areas**

There was one representation received in respect of Operational Policy HOU8 Protecting Local Character, Environmental Quality and Residential Amenity in Established Residential Areas.

**Respondents**

<b>Reference Number</b>	<b>Respondent</b>
DPS-012	Northern Ireland Housing Executive (NIHE)

**Council Consideration of Issues Raised**

<b>Main Issue(s) Raised</b>	<b>Council Consideration</b>
NIHE supports Policy HOU8 protecting quality environments, patterns and character of an area which provide a sense of place of an area.	The Council welcomes the supportive comment.

## Operational Policy HOU9 The Conversion or Change of Use of Existing Buildings to Flats or Apartments

There was one representation received in respect of Operational Policy HOU9 The Conversion or Change of Use of Existing Buildings to Flats or Apartments.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports Policy HOU9 as this will promote choice, to meet a range of need and therefore create balanced communities.	The Council welcomes the supportive comment.

\*Supplementary: whilst DfI (DPS-109) did not make representation to this policy, it did reference discontinuance of Development Control Advice Note 11 (DCAN11) and draft DCAN11 in relation to Policy TRA7, Car Parking and Servicing Arrangements in New Developments (Ref: MC50 Minor Changes Schedule). The Council was notified of the Department's position on all extant guidance by way of a letter from the Chief Planner on the 28<sup>th</sup> August 2019. Further, DfI's website included an information page on the 'Update on Extant Planning Guidance Prepared by DoE' which took effect on the 18<sup>th</sup> October 2019.

It has become apparent through receipt of DfI's representation that reference to DCANs within the dPS needs to be considered. In accordance with DfI's website DCAN8 – Housing in Existing Urban Areas is local in focus and will cease to have effect in the council area once it adopts its Plan Strategy. As a result Council's reference to the use of DCAN8 within the context of this policy will be nullified upon adoption of its Plan Strategy and it is necessary to therefore remove it now. The Council therefore proposes for clarity, as a minor change, to delete the last paragraph of the J&A of Policy HOU9 on page 25 (Ref: MC16 Minor Changes Schedule).

## Operational Policy HOU10 Affordable Housing in Settlements

There were twenty representations received in respect of Operational Policy HOU10 Affordable Housing in Settlements.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-022	Newry, Mourne & Down District Council
DPS-031	Co-Ownership
DPS-032	Turley on behalf of Northern Ireland Federation of Housing Associations (NIFHA)
DPS-041	Belfast City Council
DPS-048	Turley on behalf of Clanmil Housing Association
DPS-069	TSA Planning on behalf of Lotus Homes (UK) Ltd
DPS-070	TSA Planning on behalf of Cherrytree Holdings Ltd
DPS-071	TSA Planning on behalf of Individual
DPS-073	Gravis Planning on behalf of MRP Investment & Development Ltd
DPS-074	Gravis Planning on behalf of Killultagh
DPS-075	Gravis Planning on behalf of Individual
DPS-076	Gravis Planning on behalf of Hillmark Homes
DPS-077	Gravis Planning on behalf of Conway Estates Ltd
DPS-086	MBA Planning
DPS-087	Gravis Planning on behalf of Fraser Houses Ltd
DPS-088	Gravis Planning on behalf of Fraser Houses Ltd
DPS-089	Gravis Planning on behalf of Fraser Houses Ltd
DPS-090	Dundonald Green Belt Association
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>NIHE strongly supports Policy HOU10, stating this in line with the RDS objectives to meet the housing needs of the community. NIHE would like an opportunity to assist the Council and provide information on how Policy HOU10 can be best implemented such as through supplementary planning guidance.</p> <p>NIHE would like to see a developer contribution to help provide affordable housing and they support this through a Section 76 planning agreement.</p>	<p>The Council welcomes the supportive comments and will continue to liaise with statutory partners including the Department for Communities and NIHE in delivering the affordable housing policy.</p> <p>The Council would point out that the policy specifies circumstances where developers are required to provide affordable housing units as part of residential schemes. It would not therefore always be necessary, or appropriate to seek any further form of contribution. A Section 76 Planning Agreement is likely necessary to secure the provision of affordable housing. The Section 76 Framework document which is currently being developed jointly</p>

<p>They also support the tenure blind approach and that, by exception, affordable housing may be permitted on open space if it meets the criteria identified in the policy.</p> <p>NIHE supports the statement that affordable housing will be provided as part of the Local Policies Plan and would like the opportunity to adjust or increase the numbers of affordable housing through key site requirements (KSRs).</p> <p>It is also identified that the definition of affordable housing could change following DfC consultation. NIHE also makes reference to the Glossary. The definition of 'Affordable Housing' should reflect that in the SPPS rather than this shortened version and reference should also be made in it to ongoing consultation by Department for Communities (DfC) on the revised definition.</p> <p>Although not raised in representation to Policy HOU10, the Council notes NIHE request to be included as appropriate applicants, in addition to Housing Associations, under Policy COU5 – Affordable Housing and Policy OS1 – Protection of Open Space.</p>	<p>by a number of Councils will seek to further provide clarity on this issue.</p> <p>The Council welcomes the supportive comment regarding the mixed tenure approach.</p> <p>The Council notes the supportive comment, which is referring to the final paragraph of the J&amp;A, page 26. If specific zonings or key site requirements are identified as being necessary they can be provided at Local Policies Plan Stage, however proposals would still need to comply with all other relevant requirements of the operational policies, for example in relation to affordable housing provision where a need is identified.</p> <p>The Council notes the comment in relation to the definition of affordable housing and the suggestion regarding the Glossary definition (page 119, Part 2). Please note MC3A in relation Strategic Policy SP08 Housing in Settlements, which refers to the definition of affordable housing in accordance with the SPPS. The Glossary is intended to provide a shortened definition, which refers the reader to the SPPS. In light of the minor change referred to above, it is considered acceptable to refer the reader to the definition of affordable housing within the SPPS in this context.</p> <p>The Council is aware of DfC's proposal for an amended definition of affordable housing and will continue to liaise with both DfC and the Department for Infrastructure on this matter.</p> <p>The Council considers it necessary (as per NIHE comment under OS1) for policy wording to be consistent across Policies HOU10, COU5 and OS1. The Council proposes for clarity, as a minor change, to amend part b), paragraph 6 of Policy HOU10, page 26, as follows:  “b) the application is made by a registered Housing Association <i>or the Northern Ireland Housing Executive.</i>”  (Ref: MC17 Minor Changes Schedule)</p>
<p>Newry, Mourne &amp; Down District Council notes the policy.</p>	<p>The Council notes the comment.</p>

Co-Ownership refers to the definition of affordable housing that includes social and intermediate housing. They ask that it is important that the draft Plan acknowledges that a definition of intermediate housing will change over time. New intermediate housing products may be developed.

The first line of paragraph 3 of the policy, page 26; 'In exceptional circumstances where it is demonstrated that the affordable housing requirement cannot be met, alternative provision must be made by the applicant, or an appropriate financial contribution in lieu must be agreed through a Section 76 Planning Agreement'.

It is important that clarity is given in the order in which these tests are applied. The order could be (1) affordable on-site provision; if this is not possible (2) affordable housing provision off site; and if this is not possible (3) a financial contribution. This should be clarified, to ensure delivery is "on the ground". It must also be clear to whom the payment is to be made and that the funds received are allocated to the delivery of affordable housing.

The tenure mix of the affordable housing on the development is vital. It is important to know how many of the homes will be used for shared ownership and how many will be used for social housing. It is also important to look at the layout in terms of pepper potting shared homes so that the homes are no different from market housing. However, the social homes may be better clustered together so that the Housing Association can better manage in a cost effective way.

Design of homes and service charges are also relevant considerations so that they remain affordable and it is welcomed that the policy wording states that 'all developments

The Council notes the request. The Council has taken account of the provisions of the SPPS in the preparation of the dPS (paragraph 1.5), including in this case the definition of affordable housing. In accordance with paragraph 1.5 of the SPPS, the Council notes that DfI intends to undertake a review of the SPPS within 5 years from its publication in September 2015. The Council is aware of DfC's proposal for an amended definition of affordable housing. Should the definition of affordable housing change at some point in the future, it will be for DfI to carry this forward within the revised SPPS. The Council does not intend to amend its definition at this time.

The Section 76 Framework document which is currently being developed conjointly by a number of Councils will seek to further provide clarity on the out-workings of this Operational Policy. Paragraph 3 of the policy is clear that the Council will consider non-compliance with Policy HOU10 in exceptional circumstances only. Whilst the Council appreciates the suggestion of tests, the Council considers these are not necessary. For example, if the first test cannot be met, i.e. no, or a smaller number of affordable houses being provided on a site, then alternatives would have to be agreed through a S76 Agreement between the developer and the Council, which may involve either test 2 or test 3, or a combination of these. The Council does not therefore intend to amend the policy as suggested.

The Council notes the comments and considers these are matters for consideration of all parties to a Section 76 Agreement, including the Council, developer and the appropriate housing association provider. These details can vary on a case by case basis and sit outwith the requirements of this policy, which seeks to provide a proportionate number of affordable mixed tenure housing, allowing for greater social inclusion.

The Council welcomes the supportive comment.

<p>incorporating affordable housing should be designed to integrate with the overall scheme with no significant distinguishable design differences’.</p> <p>The Representation has also identified issues with Section 76 Agreements around the timing of building the social or shared ownership housing on the site and that developers will prefer to build the market housing first because of cash flow problems. From an affordable housing perspective there is usually a requirement in a planning agreement that not more than ‘X’ number of market housing units shall be occupied until all or ‘Y’ % of the shared ownership units/social housing units have been constructed in accordance with the planning agreement. The concept masterplan should demonstrate the comprehensive planning of the site and how the full affordable housing obligations can be met.</p>	<p>The Council notes the comment and considers this will be a matter for the Section 76 Agreement rather than specific policy requirements. If matters cannot be conditioned then they will require to be dealt with through the Section 76 Agreement between all interested parties.</p> <p>The Section 76 Framework document which is currently being developed conjointly by a number of Councils will seek to further provide clarity on this issue.</p>
<p>Turley on behalf of NIFHA and Clanmil Housing Association states the Council has failed to provide sufficient evidence to justify the proposed policy requirement and thresholds for the policy. Council also fail to consider any reasonable alternatives with the supporting SA and elements of the policy lack clarity. No consideration has been given to the delivery of the policy and its implementation.</p> <p>The Council has provided no evidence to justify the application of a threshold of 0.5 hectares or 5 units and it would have been prudent to consider a range of thresholds in determining the most appropriate option. They also fail to justify the application of 20% requirement and that the policy is deliverable.</p>	<p>In consultation with NIHE, as the statutory housing authority, the Council considered a range of options/alternatives, including a lower threshold (10% of units over 0.5ha or 10 units, which equates to 1 unit per 10 houses). However this was not considered a reasonable alternative as the threshold was too low to deliver a sufficient supply of affordable housing units to meet the required need over the Plan period.</p> <p>The Council considers that the policy achieves the principle of mixed tenure housing in keeping with the SPPS at paragraph 6.143: <i>“The HNA/HMA undertaken by the NIHE, or the relevant housing authority, will identify the range of specific housing needs, including social/affordable housing requirements. The development plan process will be the primary vehicle to facilitate any identified need by zoning land or indicating, through key site requirements, where a proportion of the site may be required for social/affordable housing.”</i></p> <p>The Council also considered Consistency Test C4 in relation to having regard to the policies of neighbouring Councils, and the fact that Lisburn &amp; Castlereagh City Council forms part of the wider Housing Market Area, details of which are provided in Technical Supplement 1 Housing Land Review. The Council’s policy reflects that of Belfast City Council as a</p>

<p>In the case of sites with 5 units, this equates to one affordable unit which would require management by a housing association. This would require management inefficiency.</p> <p>The SA which accompanies the dPS does not consider any alternative for the provision of affordable housing. No alternative thresholds or requirements have been considered.</p> <p>The wording of the policy ‘in exceptional circumstances’ lacks clarity and is unnecessary. In reality, where an applicant can reasonably demonstrate that the requirement cannot be met on site they should be able to consider an alternative form of provision. The representation recommends rewording to include “in circumstances where it can be robustly demonstrated that the affordable housing requirement cannot be met on site, alternative provision must be made by the applicant and where relevant agreed through a Section 76 Agreement”.</p> <p>The representation also has concerns regarding the implementation and delivery of Section 76 Planning Agreements securing financial contribution. Who would receive the financial contribution and can they deliver the housing required?</p> <p>NIFHA and Clanmil Housing Association welcomes the exception within the draft policy which relates to the provision of affordable housing on land identified as open space.</p>	<p>neighbouring Council within the wider BMA and therefore achieves consistency of approach in relation to the delivery of affordable housing units.</p> <p>Further detail and update is provided in the Housing and Employment Topic Paper, January 2021. See also Focussed Changes Consultation (Annex 1 and Addendum to Housing Growth Study), January 2021.</p> <p>The Council notes the comment and considers this is a matter for Housing Associations and the Department for Communities to consider, as in order to achieve mixed tenure housing it must be managed appropriately, for example, through the provision of best practice guidelines so that efficiencies can be achieved.</p> <p>Please see comment above regarding the Housing and Employment Topic Paper (note comments in relation to the Sustainability Assessment and the Council’s consideration is set out in Part 8.0 of this Public Consultation Report).</p> <p>The Council considers this wording appropriate to account for any exceptional circumstances and to provide the necessary flexibility, by allowing alternative provision or a financial contribution in lieu. The Council considers the suggested alternative limits the intent of the policy and its objective of creating mixed and balanced communities.</p> <p>The Section 76 Framework document which is currently being developed conjointly by a number of Councils will seek to further provide clarity on the outworkings of this Operational Policy, including the applicability of such financial contributions.</p> <p>The Council welcomes the supportive comment.</p>
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<p>The representations also identify the definition of Affordable Housing may be subject to change as the Department for Communities has launched a consultation paper and that the draft policy should be flexible enough to respond to future changes in the definition.</p>	<p>The Council notes the comment and acknowledges the fact that the definition provided aligns with the SPPS definition of affordable housing. The Council is aware of DfC's proposal for an amended definition of affordable housing and will continue to liaise with both DfC and the Department for Infrastructure on this matter. Please note MC3A in relation Strategic Policy SP08 Housing in Settlements, which refers to the definition of affordable housing in accordance with the SPPS.</p>
<p>Belfast City Council supports the intention as set out in Policy HOU10 to require 20% of units on sites of more than 0.5 hectares or 5 units or more to be affordable.</p>	<p>The Council welcomes the supportive comment.</p>
<p>TSA Planning on behalf of Cherrytree Holdings Ltd; Lotus Homes (UK) Ltd and an individual, supports the need for affordable housing. However, state the Plan is currently unsound in terms of the threshold and percentage provision. This policy will have an impact on smaller house builders. They would like a revised percentage provision to include:</p> <ul style="list-style-type: none"> <li>• 1 to 20 units nil</li> <li>• 21-50 units 10%</li> <li>• 51-250 units 15%</li> <li>• 250 plus units 20%</li> </ul> <p>Ensure sufficient land is zoned within the LPP to allow for mix tenure developments where a need is identified.</p>	<p>The Council welcomes the broad support for the policy. In consultation with NIHE, as the statutory housing authority, the Council considered a range of options/alternatives, including a lower threshold (10% of units over 0.5ha or 10 units, which equates to 1 unit per 10 houses). However this was not considered a reasonable alternative as the threshold was too low to deliver a sufficient supply of affordable housing units to meet the required need over the Plan period.</p> <p>The Council considers that the policy achieves the principle of mixed tenure housing in keeping with the SPPS at paragraph 6.143: <i>“The HNA/HMA undertaken by the NIHE, or the relevant housing authority, will identify the range of specific housing needs, including social/affordable housing requirements. The development plan process will be the primary vehicle to facilitate any identified need by zoning land or indicating, through key site requirements, where a proportion of the site may be required for social/affordable housing.”</i></p> <p>The Council also considered Consistency Test C4 in relation to having regard to the policies of neighbouring Councils, and the fact that Lisburn &amp; Castlereagh City Council forms part of the wider Housing Market Area, details of which are provided in Technical Supplement 1 Housing Land Review. The Council's policy reflects that of Belfast City Council as a neighbouring Council within the wider BMA and therefore achieves consistency of approach in relation to the delivery of affordable housing units.</p>



<p>Allow provisions for when delivery of affordable housing is not viable.</p>	<p>The Council considers there is provision made for this under the exceptional circumstances paragraph contained in the policy.</p>
<p>Gravis Planning on behalf of MRP Investment &amp; Development Ltd; Killultagh; an individual; Hillmark Homes; Conway Estates Ltd and Fraser Houses Ltd, support the delivery of affordable housing but disagree with the thresholds. The threshold should be introduced once the proposal meets or exceeds the 'major residential development' threshold comprising 50 residential units or more or sites of 1ha or more, and the provision should be for 10% affordable housing. The provision of social dwellings on small-scale development sites will render many unviable, resulting in a decline in small scale developments.</p> <p>The SPPS indicates that affordable housing is a matter to be addressed through zoning land or by indicating through key site requirements. These are all matters for the Local Policies Plan and not the Plan Strategy Document.</p>	<p>The Council welcomes the broad support for the policy. In consultation with NIHE, as the statutory housing authority, the Council considered a range of options/alternatives, including a lower threshold (10% of units over 0.5ha or 10 units, which equates to 1 unit per 10 houses). However this was not considered a reasonable alternative as the threshold was too low to deliver a sufficient supply of affordable housing units to meet the required need over the Plan period.</p> <p>The Council considers that the policy achieves the principle of mixed tenure housing in keeping with the SPPS at paragraph 6.143: <i>"The HNA/HMA undertaken by the NIHE, or the relevant housing authority, will identify the range of specific housing needs, including social/affordable housing requirements. The development plan process will be the primary vehicle to facilitate any identified need by zoning land or indicating, through key site requirements, where a proportion of the site may be required for social/affordable housing."</i></p> <p>The Council also considered Consistency Test C4 in relation to having regard to the policies of neighbouring Councils, and the fact that Lisburn &amp; Castlereagh City Council forms part of the wider Housing Market Area, details of which are provided in Technical Supplement 1 Housing Land Review. The Council's policy reflects that of Belfast City Council as a neighbouring Council within the wider BMA and therefore achieves consistency of approach in relation to the delivery of affordable housing units.</p> <p>The Council considers that the housing requirements set out in paragraph 6.142 of the SPPS are those measures to be contained in the LDP. The SPPS supports the promotion of mixed tenure housing, the first bullet point on page 73 states that the Housing Needs Assessment will influence how LDPs facilitate <i>'a reasonable mix and balance of housing tenures and types.'</i> The Council has therefore adopted a policy-led approach to facilitate this need. If specific zonings or key site requirements are</p>

<p>The representations also disagree that Section 76 planning agreements are the appropriate means to secure affordable housing provision as they are onerous and time consuming to put in place. A planning condition is a more appropriate and efficient means of securing the delivery of affordable housing.</p>	<p>identified as being necessary they can be provided at Local Policies Plan Stage.</p> <p>The Council notes the comment. Parties should enter into discussions on such Section 76 Agreements at the earliest possible stage, including at the pre-application discussion stage. A S76 Agreement is legally binding and is seen as the most pragmatic and viable way of securing the provision of affordable housing whereas planning conditions, through removal or variation, can undermine the intent of the policy to cater for an identified housing need.</p>
<p>MBA Planning identifies a list of issues with the policy and refers to a previous study from three Dragons Heriot-Watt University into Developer Contributions for Affordable Housing in Northern Ireland 2015.</p> <p>Policy HOU10:</p> <ul style="list-style-type: none"> <li>• Does not identify if the affordable housing provision must comprise social rented or intermediate housing, or both;</li> <li>• While it indicates that the developer is to bear the cost of affordable housing it does not specify this;</li> <li>• It does not specify what ‘alternative provision’ means;</li> <li>• It does not indicate in what circumstances it may be acceptable to provide alternative provision;</li> <li>• It does not specify how a financial contribution would be calculated;</li> <li>• It does not specify who would be responsible for calculating the contribution;</li> <li>• It does not specify what the financial contribution will be used for;</li> <li>• It does not state whether the contribution will be returned to the developer if not used for a specific project within a certain timeframe</li> </ul> <p>Policy HOU10 is out of step with Regional Policy of the SPPS paragraph 6.143 and PPS12 paragraph 53, in that affordable housing need will be facilitated by zoning land or by indication through key site requirements.</p>	<p>The Council notes the points made. For the purposes of interpreting the policy, ‘affordable housing’ relates to social rented housing and intermediate housing as defined in the glossary to the SPPS, page 114. This is footnoted on page 26.</p> <p>Please note MC3A in relation Strategic Policy SP08 Housing in Settlements, which refers to the definition of affordable housing in accordance with the SPPS.</p> <p>The questions posed are essentially matters for consideration through a S76 agreement, which paragraph 3 of the policy on page 26 refers to. The main focus of the policy is in the provision of affordable homes within settlements. The points made in the representation are those for negotiation on a case by case basis.</p> <p>The Section 76 Framework document which is currently being developed jointly by a number of Councils will seek to further provide clarity on the outworkings of this Operational Policy.</p> <p>The Council considers that the housing requirements set out in paragraph 6.142 of the SPPS are those measures to be contained in the LDP. The SPPS supports the promotion of mixed tenure housing, the first bullet point on page 73 states that the Housing Needs Assessment will influence how LDPs facilitate ‘a reasonable mix and balance of housing tenures</p>

	<p><i>and types.</i>' The Council has therefore adopted a policy-led approach to facilitate this need. If specific zonings or key site requirements are identified as being necessary they can be provided at Local Policies Plan Stage.</p>
<p>Dundonald Green Belt Association states that the approach to social and affordable housing delivery lacks a serious operational dimension. It should include a requirement for social and affordable build in all major housing applications.</p>	<p>The Council notes the comment however would point out that the policy requires the provision of affordable housing in all but the smallest of development proposals (less than 5 units) secured by S76 Planning Agreements. The Council is content that the comment made is therefore appropriately addressed in this policy.</p>
<p>Dfl fully supports the commitment in the plan objectives to delivering sustainable communities and new homes in a range of types and tenures, including affordable housing. In respect of this policy, it is noted that the contribution is stated to be a minimum (20%) and clarification would be welcomed in the policy or J&amp;A of the circumstances when a greater contribution may be sought, for example in response to the need indicated by the HNA.</p> <p>Similarly where the need indicated by a HNA is less than the 20% contribution how will the level of contribution be calculated?</p> <p>While Dfl welcomes any policy that maximises opportunities to deliver affordable units and mixed tenure developments, the Council should continue to liaise with statutory partners including the Department for Communities and NIHE. This will ensure that the evidence base underpinning such approaches is robust and that measures such as guidance, are in place to support the practical implementation of the policy. This will be particularly important in respect of the exceptional circumstances when, as indicated in the policy, a financial</p>	<p>The Council notes the comment. In circumstances when a greater contribution may be sought, for example, where there is a greater need identified in the HNA, the Council will liaise with NIHE as statutory housing authority (and consultee on planning applications) on a case-by-case basis and seek where possible to enter a S76 Agreement with the developer. This allows sufficient flexibility for schemes submitted by Housing Associations to provide greater than 20% affordable housing.</p> <p>The Council considers that where the need indicated by the HNA is less than the 20% contribution, this applies only in relation to the 'social housing need' identified. The affordable 'intermediate' housing need is not confined to any specific settlement, but must be met across the Council-wide area. So albeit there is no 'social housing need' identified for a particular settlement in the HNA, the intermediate need will always be a requirement, and therefore developers should liaise with housing associations to deliver this particular type of affordable housing.</p> <p>The Council notes the comment and is committed to continued dialogue with its statutory partners to ensure delivery of affordable homes.</p> <p>The Section 76 Framework document which is currently being developed conjointly by a number of Councils will seek to further provide clarity on the outworkings of this Operational Policy.</p>

contribution is made in lieu of the provision of affordable units.	
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## Operational Policy HOU11 Specialist Accommodation

There were five representations received in respect of Operational Policy HOU11 Specialist Accommodation.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-022	Newry, Mourne & Down District Council
DPS-032	Turley on behalf of Northern Ireland Federation of Housing Associations (NIFHA)
DPS-048	Turley on behalf of Clanmil Housing Association
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>NIHE supports Policy HOU11 as it supports their Supported People Programme.</p> <p>NIHE would like to see the policy recognise that flexibility may need to be applied in the application of residential design standards due to the specific nature of specialist accommodation.</p> <p>NIHE would also like to see the definition of 'Specialised Housing' included in the Glossary of the document.</p>	<p>The Council welcomes the supportive comment.</p> <p>The Council notes the comment but considers its housing policies are sufficiently flexible to accommodate residential design standards in developments where specialist accommodation is to be provided.</p> <p>The Council proposes for clarity, as a minor change, to amend the first sentence of the J&amp;A to Policy HOU11, page 27, as follows:  <i>"Specialist residential accommodation is purpose-built or converted residential accommodation designed to provides opportunity for individuals to access accommodation that is more suitable for their needs, such as retirement-villages sheltered housing and care-related facilities."</i>            (Ref: MC18 Minor Changes Schedule)</p> <p>The amendment also encompasses changes sought by DfI, see below.</p>
Newry, Mourne & Down District Council notes the policy.	The Council notes the comment.
<p>Turley on behalf of NIFHA and Clanmil Housing Association considers the Council has failed to adequately consider the implementation of the policy.</p> <p>Under the policy one of the tests relates to the homes or bed spaces for community need requiring a statement of specialist housing need. In the case of specialist housing to be</p>	<p>The Council has fully considered the policy and is content that the policy is sound and capable of being implemented.</p> <p>If specialist housing is to be provided as social housing, then it will be subject to Policy HOU11 whether this is a standalone facility or part of a wider social housing scheme. The information</p>

<p>provided as social housing (Category A Housing) this test should not apply given that the test for social housing is already met and the planning application should not have to demonstrate this again.</p> <p>In relation to the second test of the policy for locational need the development may be required where there is a need for care housing but limited access to leisure facilities etc. A balanced approach should be applied to the decision making process.</p> <p>In relation to a proposed extension to an existing facility careful consideration should be given to whether all the criteria should be rigidly applied as in some cases it may be more efficient to extend an existing facility rather than build a new facility elsewhere.</p>	<p>required in relation to criteria a) is simply supplied to demonstrate that the type of specialist accommodation is required in the area/community.</p> <p>Policy HOU10 clearly states specialist accommodation for a group of people with specific needs will not be subject to Policy HOU10, but instead will be considered under Policy HOU11.</p> <p>The Council recognises that specialist accommodation requires a suitable environment to cater for an identified need. Care is therefore required in the planning assessment of these projects to ensure that their location, design, layout and external environment offer appropriate opportunities for an active participation in community life for those residents who are able. For those who are not, the quality of its internal environment takes on an even greater importance and the policy seeks to achieve these aims.</p> <p>The policy permits extensions where the criteria can be met. The Council does not see a reason why the criteria should not apply to an extension as there should be a need demonstrated and the location considered as part of any proposal.</p>
<p>Dfl notes the reference to ‘retirement villages’ within the J&amp;A is in contrast to the reference within the policy to sheltered housing. Clarification is requested in relation to the definition of ‘retirement village’ and how this is distinguished from sheltered housing referred to in the policy wording. If there is no substantive difference then Dfl recommends that for consistency the wording in the J&amp;A should be revised to reflect that of the policy.</p>	<p>The Council notes the contrasting references between the policy and its J&amp;A. The Council proposes for clarity, as a minor change, to amend the first sentence of the J&amp;A of Policy HOU11, page 27, as follows:</p> <p><i>“Specialist residential accommodation is purpose-built or converted residential accommodation designed to provides opportunity for individuals to access accommodation that is more suitable for their needs, such as <del>retirement villages sheltered housing</del> and care-related facilities.”</i>  (Ref: MC18 Minor Changes Schedule)</p> <p>See also NIHE comment, as noted above.</p>

## Operational Policy HOU12 Accommodation for the Travelling Community

There were four representations received in respect of Operational Policy HOU12 Accommodation for the Travelling Community.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-019	Individual
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE welcomes Policy HOU12. Opportunity exists in the policy to refer to the Design Guide for Traveller Sites in NI, the new Model Licence Conditions 2019 for Caravan Sites (published by DfI) and the Draft Design Guide for Travellers Sites 2019 (published by DfC).	The Council proposes for clarity, as a minor change, to insert the following sentence at the end of the J&A of Policy HOU12, page 28: <i>“Further information is available in the Design Guide for Travellers’ Sites NI (draft 2019), published by DfC.”</i> (Ref: MC19C Minor Changes Schedule)
An Individual states that the policy is unsound as it does not take into account resources and the Plan Strategy should make more land available.	The Council notes the comment. It is considered that this is a matter for the Local Policies Plan stage. Any identified need resulting from the Housing Needs Assessment, can be assessed against site specific locations as necessary.
NIEA request that criteria (a) should be expanded/clarified and recommend the following amendment: "(a) landscape proposals are provided in order to visually integrate the proposal."	The Council notes the comment and agrees that this would be beneficial. The Council proposes for clarity, as a minor change, to amend criteria a) of Policy HOU12, page 27, as follows: <i>“a) adequate landscaping is provided to visually integrate the proposal.”</i> (Ref: MC19A Minor Changes Schedule)
DfI notes the provisions of the policy which reflect much of HS3 Travellers Accommodation (Amended) in the addendum to PPS12 ‘Housing in Settlements’ Council should note that the amended HS3 policy permitted as an exception, a single family transit site or serviced site without a requirement to demonstrate need. The wording in draft Policy HOU12 would appear to permit such sites as an exception albeit still subject to a demonstration of need. Council should be satisfied that the plan evidence supports the approach set out and that Housing Needs Assessment prepared by	The Council notes the comment and agrees that the wording of HOU12 is unclear. The Council proposes for clarity, as a minor change, to amend paragraph 3 of Policy HOU12, page 27, as follows: <i>“Exceptionally a single traveller transit site or serviced site may be permitted in the countryside. Such proposals will be assessed on their merits, having regard to the above criteria and the sequential requirements of Policy COU5.”</i> (Ref: MC19B Minor Changes Schedule)

NIHE will, as appropriate, indicate need for single family transit sites.	
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## 2. COMMUNITY FACILITIES IN SETTLEMENTS

### Operational Policy CF01 Necessary Community Facilities in Settlements

There were two representations received in respect Operational Policy CF01 Necessary Community Facilities in Settlements.

#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-111	Joanne Bunting MLA

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports Policy CF01. NIHE would like to see a developer contribution from the granting of planning permission to help fund the community infrastructure.	<p>The Council notes the supportive comment. Strategic Policy 07 on page 45, Part 1 of the Draft Plan Strategy identifies that Section 76 Planning Agreements are the mechanism for securing developer contributions for the provision of necessary community infrastructure. KSRs on zoned sites can also identify necessary infrastructure provision, whilst individual operational policies outline the provision of certain requirements, for example appropriate connection of walking/cycling routes to existing or proposed routes outside of the development. Such requirements are secured by planning conditions to ensure delivery of these community based outcomes. The Section 76 Framework document which is currently being developed jointly by a number of Councils will seek to further provide clarity on the outworkings of this Operational Policy.</p> <p>Key Site Requirements (KSRs) may come forward at the Local Policies Plan stage to stipulate community facilities deemed necessary, to be provided by developers on zoned sites.</p>
Joanne Bunting MLA referring to the Dundonald area supports the policy for necessary community facilities and that those who seek to benefit from development should contribute to community and infrastructure improvements. Seeks assurance that the policy is robust, not only by putting conditions and agreements in place but that these can be enforced.	The Council notes the supportive comments in relation to Dundonald. Where community facilities are required, a Section 76 Planning Agreement is an effective tool to ensure their delivery. Such an agreement is legally binding in relation to the works specified and is the means to enforce when works are not carried out.

	<p>The Section 76 Framework document which is currently being developed conjointly by a number of Councils will seek to further provide clarity on the outworkings of this Operational Policy.</p> <p>Key Site Requirements (KSRs) may come forward at the Local Policies Plan stage to stipulate community facilities deemed necessary, to be provided by developers on zoned sites.</p>
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## Operational Policy CF02 Protection of a Local Community Facility

There were two representations received in respect Operational Policy CF02 Protection of a Local Community Facility.

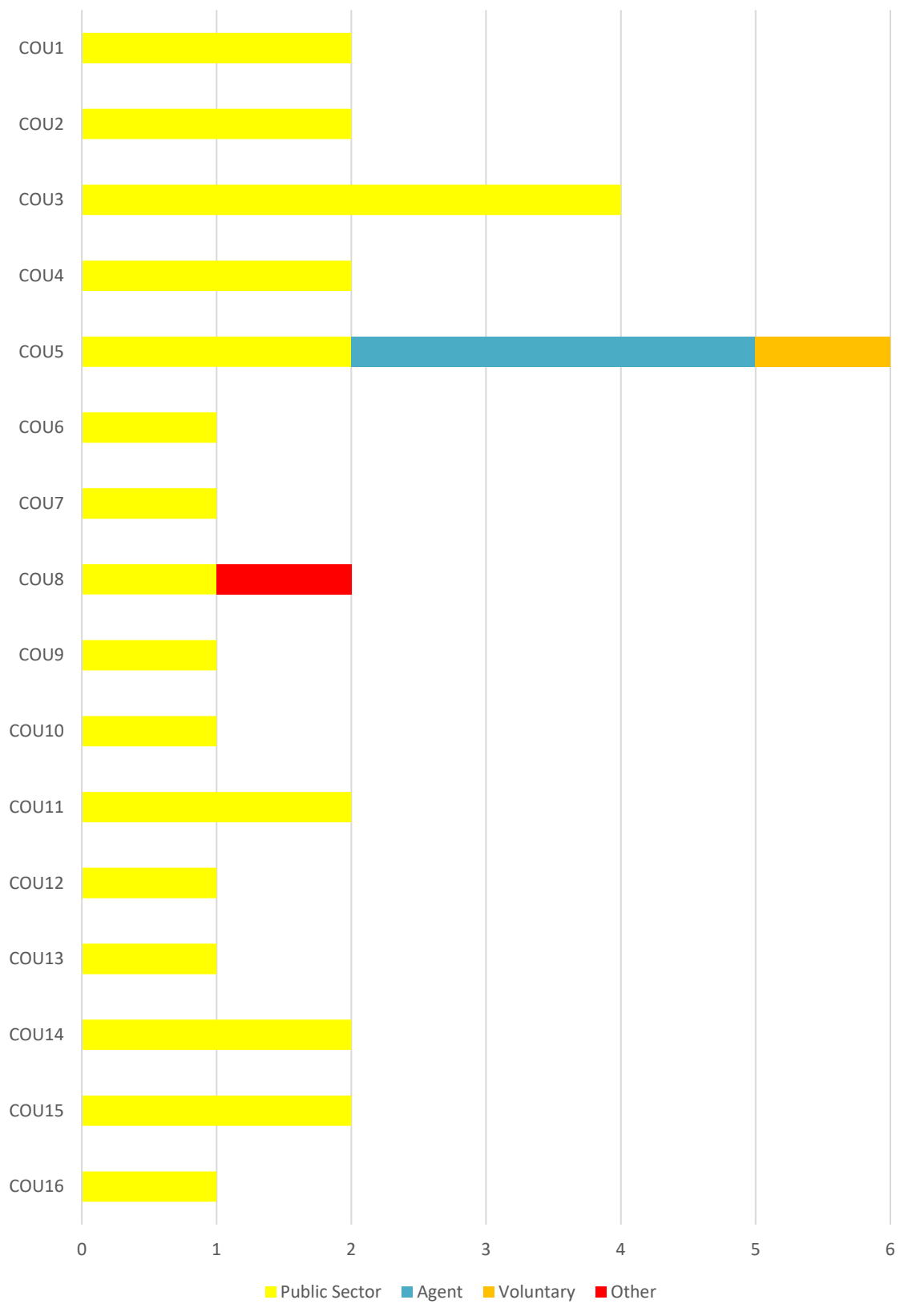
### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports Policy CF02.	The Council welcomes the supportive comment.
DfI notes the intent of this policy, however policy criteria a) and b) offer opportunities encouraging the loss of community facilities rather than its protection. The Council should consider how they will measure a 'deficit in community facilities' as they range in nature, scale and function.	The Council notes the comment and disagrees that the policy encourages the loss of community facilities. Rather, the policy sets out exceptions requiring demonstration that the loss would not result in a deficit in community facilities. The Council considers that applications which identify a deficit, would be subject to consultation with the Community Services Unit in the Council, or conversely through the Council's Community Plan Action Plan, and only permitted where it has been established that a particular use/facility is no longer serving the needs of the local population or is being replaced elsewhere.

### Section A Operational Policies by Respondent Type continued (Development in the Countryside)



### 3. DEVELOPMENT IN THE COUNTRYSIDE

#### Operational Policy COU1 Development in the Countryside

There were two representations received in respect of Operational Policy COU1 Development in the Countryside.

#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.
NIEA comment that the wording of this policy would suggest that "other non-residential development proposals" are the only development type required to comply with all policy requirements contained in the operational policies. They would encourage that all development in the countryside residential or non-residential should be subject to all policy requirements contained in the operational policies, and in particular those policies relating to the Natural Environment.	The Council notes this comment regarding other non-residential development proposals. However, the Council would advise that page 3 of the Preamble makes it clear that the operational policies must not be read in isolation from one another. Proposals must comply with all policy requirements contained in the operational policies, where relevant to the development.

## Operational Policy COU2 New Dwellings in Existing Clusters

There were two representations received in respect of Operational Policy COU2 New Dwellings in Existing Clusters.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.
NIEA considers criteria (e) of the policy to be a bit convoluted. It may be simpler to state that "development of the site can be visually integrated with its surroundings."	The Council notes the comment and suggested rewording of criteria (e). Criteria (e) is one of the policy tests which sets out requirements for visual integration. The wording largely mirrors the tests set out in paragraph 6.73, page 52 of the SPPS. The Council therefore does not intend to amend the policy wording as suggested.

## Operational Policy COU3 Replacement Dwellings

There were four representations received in respect of Operational Policy COU3 Replacement Dwellings.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.
<p>HED advises that to make Policy COU3 Replacement Dwellings more sound they would like to see the insertion of a sub-heading <u>'Non-Listed Vernacular Dwellings'</u> before the third paragraph within the policy context to help interpretation and application.</p> <p>HED also recommends that the Policy COU3 includes reference to Policy HE13 'The Conversion and Reuse of Non-Listed Buildings' as follows: The retention and sympathetic refurbishment, with adaptation if necessary, of non-listed vernacular dwellings in the countryside will be encouraged in preference to their replacement <u>in accordance with Planning Policies COU4 and HE13.</u></p>	<p>The Council notes the comment and agrees this sub-heading would be beneficial. The Council proposes for clarity, as a minor change, to insert the following sub-heading before paragraph 3 of the policy, page 32: <b><u>"Non-Listed Vernacular Dwellings"</u></b> (Ref: MC20A Minor Changes Schedule)</p> <p>The Council notes the comment and agrees this clarification would be beneficial. The Council proposes for clarity, as a minor change, to amend paragraph 3 of Policy COU3, page 32, as follows: "The retention and sympathetic refurbishment, with adaptation if necessary, of non-listed vernacular dwellings in the countryside will be encouraged in preference to their replacement <u>in accordance with Planning Policies COU4 and HE13.</u>" (Ref: MC20B Minor Changes Schedule)</p> <p>The Council would also advise that page 3 of the Preamble makes it clear that the operational policies must not be read in isolation from one another. Proposals must comply with all policy requirements contained in the operational policies, where relevant to the development.</p>

<p>It would be helpful to underline policy sub-headings to give structure to policy context (see above)</p>	<p>The Council notes the comment, however it is of the opinion that underlining policy subheadings is not necessary as the main policy is highlighted in bold text.</p>
<p>NIEA comment that Criteria b) of the policy should be amended by removing the word 'significantly'. This may leave the Council open to debate/question. It may be preferable to state that "the overall size of the new dwelling must not have a visual impact greater than 5% of the existing building".</p>	<p>The Council disagrees with the suggested alteration as this is the exact wording taken from the SPPS (second bullet point under paragraph 6.73, page 53).</p>
<p>Dfl comment that this policy reflects the SPPS and many of the provisions of existing operational policy. Whilst some criteria relating to necessary services being available and access to the public road not prejudicing public safety are not included, it is however noted that these elements are addressed in draft policies COU15 and COU16.</p>	<p>The Council notes the comment and confirms that COU15 and COU16 applies to all development proposals in the Countryside. The Council would also advise that page 3 of the Preamble makes it clear that the operational policies must not be read in isolation from one another. Proposals must comply with all policy requirements contained in the operational policies, where relevant to the development.</p>



## Operational Policy COU4 The Conversion and Reuse of Buildings for Residential Use

There were two representations received in respect of Operational Policy COU4, The Conversion and Reuse of Buildings for Residential Use.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-030	Department for Communities, Historic Environment Division (HED)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.
<p>HED advises that to make the policy more sound they recommend amending the policy head note to read – <i><u>The Conversion and Reuse of Buildings.</u></i></p> <p>The first paragraph and criteria (a) to (e) of the policy context is a duplication of Policy HE13. HED recommends omitting the duplicate text and in lieu, cross referencing HE13 as follows: <u>‘Planning permission will be granted to proposals for the sympathetic conversion, with adaptation if necessary, of a non-listed vernacular building or a suitable locally important building (such as former school houses, churches and older traditional barns and outbuildings) for a variety of alternative uses, including use as a single dwelling, where this would secure its upkeep and retention. Such proposals will be required to be of a high design quality and meet all of the criteria specified under Policy HE13.’</u></p> <p>HED advises that the last paragraph relating to Listed Buildings could be omitted, as this is already covered under the suite of Historic Environment policies; HE6, HE8, and HE9.</p>	<p>The Council notes the suggested amendment to the policy title, however Policy COU4 deals with proposals for conversion to residential use whilst a separate policy, COU14, is for conversion to non-residential use. It is considered necessary to retain the heading, as this reflects the same approach taken in the SPPS.</p> <p>The Council notes the duplication of Policy HE13 criteria (a) to (e) within Policy COU4 however is of the opinion that their removal is not considered necessary, as it reinforces the policy criteria.</p> <p>The Council notes the comment, however it considers there is merit in retaining the paragraph. Whilst it serves as information, it directs the reader to the vital policy requirements to be addressed when dealing with the conversion and reuse of Listed</p>

	Buildings for residential use. The Council does not therefore propose to remove this paragraph from the policy text as suggested.
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## Operational Policy COU5 Affordable Housing

There were six representations received in respect of Operational Policy COU5 Affordable Housing.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-031	Co-Ownership
DPS-032	Turley on behalf of Northern Ireland Federation of Housing Associations (NIHFA)
DPS-039	Inaltus Limited on behalf of O'Kane Property Ltd
DPS-048	Turley on behalf of Clanmil Housing Association
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.</p> <p>Policy COU5 Affordable Housing is welcomed to allow for exceptions where a need has been identified by NIHE outside settlements. NIHE and DOE previously produced a joint protocol for the implementation of CTY5 of PPS21 and this should be retained to provide guidance for all stakeholders on the approach to be taken when applying for planning permission.</p> <p>NIHE would like to see a restriction that planning permission will only be given where applications are submitted by a Housing Association or the Housing Executive.</p>	<p>The Council welcomes the supportive comment.</p> <p>The Council is aware of the informal protocol that existed between the former DOE and NIHE however this has not been published by the Department for Infrastructure nor is it available on the Planning Portal as supplementary guidance, therefore is not in the public domain. NIHE may wish to raise this matter with DfI in terms of supplementary planning guidance.</p> <p>The last sentence of Policy COU5 states that an exception for affordable housing in the countryside is provided to meet an “identified need.” Paragraph 4 of the J&amp;A, page 35 states: “Planning permission will only be granted where the application is made by a registered Housing Association”. Having considered the comment provided, the Council considers there is merit in providing further clarification. The Council proposes for clarity, as a minor change, to amend the first sentence of Policy COU5, page 34, and last paragraph in the J&amp;A, page 35, as follows:  “Planning permission will be granted by exception for a small group of no more than 14 dwellings adjacent to or near a village or small settlement to provide affordable housing which meets a <del>identified</del> need <i>identified by the</i></p>

	<p><i>Northern Ireland Housing Executive within that settlement.”</i>  (Ref: MC21A Minor Changes Schedule)  and  “Planning permission will only be granted where the application is made by a registered Housing Association <i>or the Northern Ireland Housing Executive”.</i>  (Ref: MC21B Minor Changes Schedule)</p>
<p>Co-Ownership welcomes Policy COU5 Affordable Housing as it will add to the delivery of affordable housing in Lisburn &amp; Castlereagh Council area.</p>	<p>The Council welcomes the supportive comment.</p>
<p>Turley on behalf of both NIFHA and Clanmil Housing Association refers to the draft policy as a departure from the policy wording of PPS21. These representations have concerns that some elements of Policy CTY5 of PPS21 have been removed from the wording of draft Policy COU5 and instead provided within the supporting text. Policy wording requiring the need for housing identified by NIHE and for the applicant to be a housing association has been removed from the main policy wording.</p>	<p>The last sentence of Policy COU5 states that an exception for affordable housing in the countryside is provided to meet an “identified need.” Paragraph 4 of the J&amp;A, page 35 states: “Planning permission will only be granted where the application is made by a registered Housing Association”. Having considered the comment provided, the Council considers there is merit in providing further clarification. The Council proposes for clarity, as a minor change, to amend the first sentence of Policy COU5 and last paragraph in the J&amp;A as follows: “Planning permission will be granted by exception for a small group of no more than 14 dwellings adjacent to or near a village or small settlement to provide affordable housing which meets an <del>identified</del> need <i>identified by the Northern Ireland Housing Executive within that settlement.”</i>  (Ref: MC21A Minor Changes Schedule)  and  “Planning permission will only be granted where the application is made by a registered Housing Association <i>or the Northern Ireland Housing Executive”.</i>  (Ref: MC21B Minor Changes Schedule)</p>
<p>Inaltus Limited on behalf of O’Kane Property Ltd refers to Hillhall and reuse of Industrial Land at the edge of the settlement. In reference to Policy COU5 Affordable Housing for up to 14 dwellings, this policy should be amended to introduce more flexibility, where a mix of housing including a proportion of affordable homes will be permitted where the proposal abuts the settlement limit and results in reuse of former industrial lands.</p>	<p>Policy COU5 is aimed at addressing need for affordable housing only and not general needs housing. Criteria includes identifying need through the NIHE Housing Needs Assessment (see above comments). The majority of land considered by the Council as suitable for housing will be allocated through the development plan process within settlements at the Local Policies Plan stage in</p>

<p>They have asked for the text wording to include “in exceptional circumstances, general housing along with affordable housing will be permitted at the edge of a small settlement where it involves the reuse of formerly used lands, and forms part of larger mixed use regeneration initiative that will help sustain the rural community of the settlement it abuts”.</p>	<p>accordance with the Plan Strategy’s Strategic Housing Allocation.</p> <p>The suggested wording goes beyond the thrust of the policy aimed at providing Affordable housing only. Therefore the Council is content that the current wording remains unaltered.</p>
<p>Dfl notes the contents of the draft policy which takes account of the SPPS and broadly reflects Policy CTY5 in PPS21. It is suggested that the policy wording should refer to the requirement for the applicant to demonstrate that the need cannot be readily met within an existing settlement in the locality, rather than introducing this in the J&amp;A to the policy.</p>	<p>The Council proposes for clarity, as a focussed change, to amend the last paragraph of Policy COU5, page 34, as follows:  <i>“Generally only one group will be permitted in close proximity to any particular settlement in the rural area <b>and should demonstrate that the need cannot be met within the identified settlement.</b>”</i>  <a href="#">(Ref: FC6 Focussed Changes Schedule)</a></p>

## Operational Policy COU6 Personal and Domestic Circumstances

There was one representation received in respect of Operational Policy COU6 Personal and Domestic Circumstances.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.

## Operational Policy COU7 Dwellings for Non-Agricultural Business Enterprises

There was one representation received in respect of Operational Policy COU7 Dwellings for Non-Agricultural Business Enterprises.

### Respondents Received

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.

## Operational Policy COU8 Infill/Ribbon Development

There were two representations received in respect of Operational Policy COU8 Infill/Ribbon Development.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.
<p>RSPB NI comments that there is a typo/error in the headline text which states 'planning permission will be refused for a building which <u>extends</u> or <u>adds</u> to a ribbon of development'. However, the verbs 'add' and 'extend' within this policy narrative essentially mean the same thing.</p> <p>The original policy wording contained within Policy CTY 8 of PPS 21 actually states 'Planning permission will be refused for a building which <u>creates</u> or adds to a ribbon of development'. It is therefore assumed that the text within the dPS is a typo/error.</p> <p>The opening line of Policy COU8 should be amended to read 'Planning permission will be refused for a building which creates or adds to a ribbon of development', to be consistent with PPS 21 and the SPPS (paragraph 6.73).</p>	<p>The Council notes the comment, acknowledging that the SPPS paragraph 6.73, page 53 states: 'Planning permission will be refused for a building which creates or adds to a ribbon of development.'</p> <p>The Council proposes for clarity, as a minor change, to amend paragraph 1 of Policy COU8, page 36 to reflect the wording of the SPPS as follows:            "Planning permission will be refused for a building which <i>creates extends</i> or adds to a ribbon of development."  <a href="#">(Ref: MC22 Minor Changes Schedule)</a></p>



## Operational Policy COU9 Temporary Caravan

There was one representation received in respect of Operational Policy COU9 Temporary Caravan.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.

## Operational Policy COU10 Dwellings on Farms

There was one representation received in respect of Operational Policy COU10 Dwellings on Farms

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.

## Operational Policy COU11 Farm Diversification

There were two representations received in respect of Operational Policy COU11 Farm Diversification.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.
NIEA welcomes that farm diversification criteria which states that any proposals are not to have an adverse impact on the natural environment.	The Council welcomes the supportive comment.

## Operational Policy COU12 Agricultural and Forestry Development

There was one representation received in respect of Operational Policy COU12 Agricultural and Forestry Development.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.

### **Operational Policy COU13 Necessary Community Facilities in the Countryside**

There was one representation received in respect of Operational Policy COU13 Necessary Community Facilities in the Countryside.

#### **Respondents**

<b>Reference Number</b>	<b>Respondent</b>
DPS-012	Northern Ireland Housing Executive (NIHE)

#### **Council Consideration of Issues Raised**

<b>Main Issue(s) Raised</b>	<b>Council Consideration</b>
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.

## Operational Policy COU14 The Conversion and Reuse of Buildings for Non-Residential Use

There were two representations received in respect of Operational Policy COU14 The Conversion and Reuse of Buildings for Non-Residential Use.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-030	Department for Communities, Historic Environment Division (HED)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.
HED suggests that Policy COU14 is omitted (as the policy text is very similar to HE13) and suggest policy changes are made to policy COU4. (See comments under Policy COU4). This will result in one policy for residential and non-residential use.	<p>The Council notes the suggested amendment to omit Policy COU14, however would state that this policy deals with proposals for the conversion of buildings to <i>non-residential</i> uses whereas Policy COU4 deals with proposals for conversion to <i>residential</i> use.</p> <p>The Council considers that merging the policies as proposed will not provide greater clarity. The retention of separate policy provision is the approach to regional guidance contained in the SPPS. See comments on the Council's consideration in relation to this matter under Policy COU4.</p>

## Operational Policy COU15 Integration and Design of Buildings in the Countryside

There were two representations received in respect of Operational Policy COU15 Integration and Design of Buildings in the Countryside.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)

### Council Consideration of Issues Raised

Main Issue	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.
<p>NIEA welcomes criteria points a), c) and e) to integrate a building sympathetically into the surrounding landscape.</p> <p>The following additional line should be added "All landscape features to be retained are to be protected prior to the commencement of any other site works including site clearance."</p> <p>Access and other ancillary works: NIEA would recommend the addition of the following sentence: "Garden ornamentation on entrance pillars or other prominent locations within the defined curtilage of a development site will not be acceptable."</p>	<p>The Council welcomes the supportive comment.</p> <p>The Council proposes for clarity, as a minor change, to insert a sentence at the end of the J&amp;A of Policy COU15 under subheading 'Integration' page 41, as follows:  <i>"All landscape features which are required to be retained will be appropriately conditioned to be protected prior to the commencement of any other site works including site clearance."</i>            (Ref: MC23 Minor Changes Schedule)</p> <p>The Council notes the comment and advises it considers this is a subjective matter and potentially too restrictive. The Council is bound to paragraph 3.8 of the SPPS: <i>'Under the SPPS, the guiding principle for planning authorities in determining planning applications is that sustainable development should be permitted, having regard to the development plan and all other material considerations, unless the proposed development will cause demonstrable harm to interests of acknowledged importance.'</i> The Council considers that these matters are best dealt with through the Development Management process.</p>

## Operational Policy COU16 Rural Character and other Criteria

There was one representation received in respect of Operational Policy COU16 Rural Character and other Criteria.

### Respondents

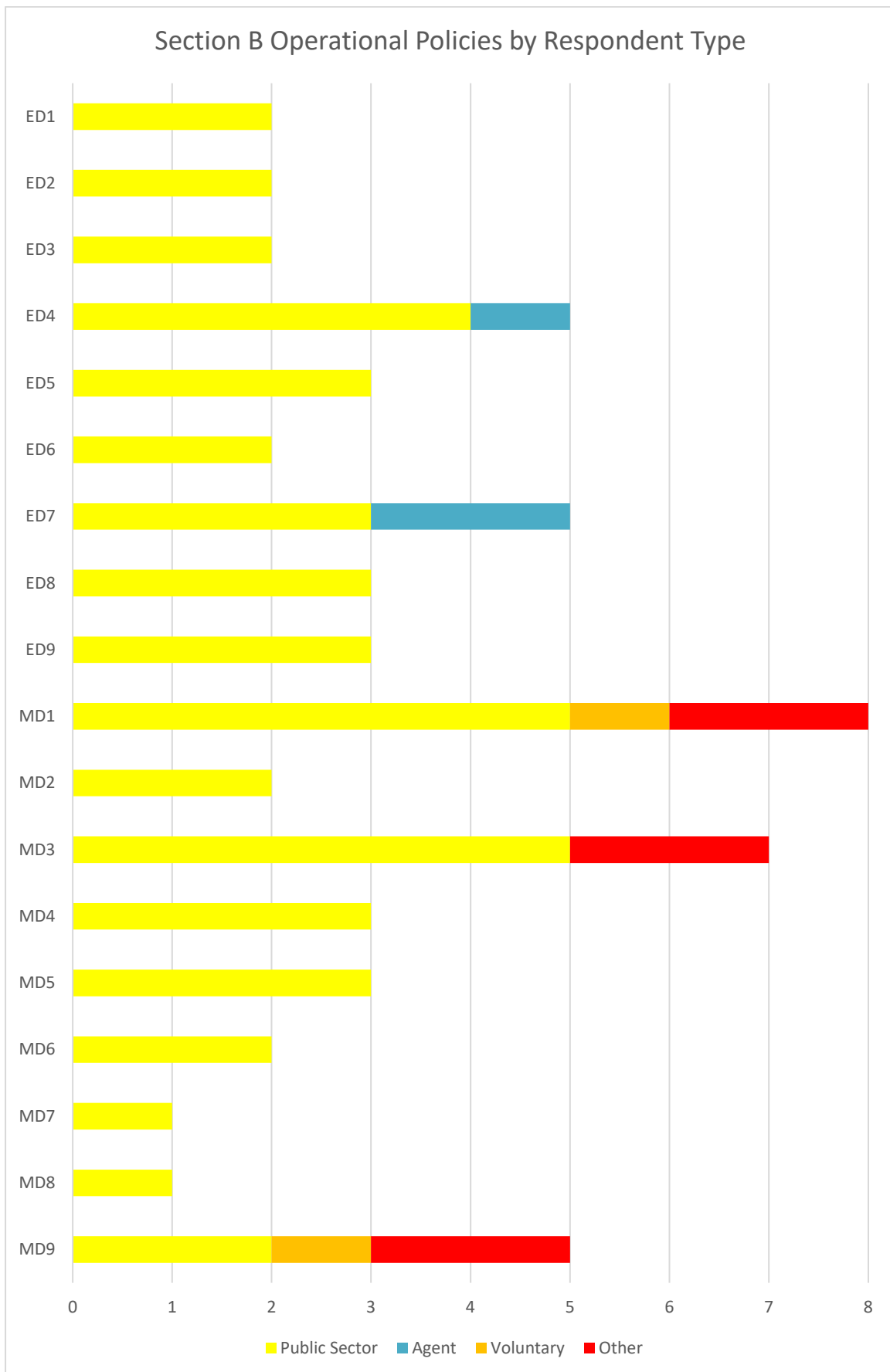
Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the policy aims to facilitate development that contributes to a sustainable rural community and economy, whilst protecting and conserving the rural landscape, heritage assets and the environment.	The Council welcomes the supportive comment.



**B: A THRIVING PLACE**



#### 4. ECONOMIC DEVELOPMENT

##### Operational Policy ED1 Economic Development in Cities and Towns

There were two representations received in respect of Operational Policy ED1 Economic Development in Cities and Towns.

##### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-064	Invest Northern Ireland (Invest NI)

##### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>NIHE welcomes the sequential approach used to identify employment land. NIHE supports barrier free employment locations within the urban footprint, near to residential areas or close to centres, which are accessible by means other than the private car.</p> <p>NIHE would like to see a statement which explicitly states that economic development sites that are accessible by public transport will be included in a sequential test. It is noted that reducing travel demand through integration of land-use planning and transport is a key objective of the draft Programme for Government.</p>	<p>The Council welcomes the supportive comments.</p> <p>The Council notes the comment, however confirms that the policy directs proposals for B1 uses to the defined city and towns of the district as the most appropriate locations benefiting from a high level of infrastructure provision, including public transport; and B2, B3 and B4 uses to zoned employment land. These settlements are also the location of the majority of existing and proposed housing. As such the Council does not see a need to include a further test as suggested.</p> <p>Additionally, Policy ED9 General Criteria for Economic Development requires all proposals to demonstrate accessibility, including access to public transport, walking and cycling provision.</p>
<p>Invest NI supports Policy ED1 as it is consistent with existing policy PED1- Economic Development in Settlements of PPS4</p>	<p>The Council welcomes the supportive comment.</p>

## Operational Policy ED2 Economic Development in Villages and Small Settlements

There were two representations received in respect of Operational Policy ED2 Economic Development in Villages and Small Settlements.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-064	Invest Northern Ireland (Invest NI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the sequential approach for economic development with land within settlements being considered first before open countryside sites are investigated.	The Council welcomes the supportive comment.
Invest NI supports Policy ED2 as it is consistent with existing Policy PED1 - Economic Development in Settlements of PPS4.	The Council welcomes the supportive comment.

## Operational Policy ED3 Expansion of an Established Economic Development Use in the Countryside

There were two representations received in respect of Operational Policy ED3 Expansion of an Established Economic Development Use in the Countryside.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-064	Invest Northern Ireland (Invest NI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the sequential approach for economic development with land within settlements being considered first before open countryside sites are investigated.	The Council welcomes the supportive comment.
Invest NI supports Policy ED3 as it is consistent with existing Policy PED3 - Expansion of an Established Economic Development Use in the Countryside of PPS4.	The Council welcomes the supportive comment.

## Operational Policy ED4 Redevelopment of an Established Economic Development Use in the Countryside

There were five representations received in respect of Operational Policy ED4 Redevelopment of an Established Economic Development Use in the Countryside.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-039	Inaltus Limited on behalf of O'Kane Property Ltd
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-064	Invest Northern Ireland (Invest NI)
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the sequential approach for economic development with land within settlements being considered first before open countryside sites are investigated.	The Council welcomes the supportive comment.
<p>Inaltus Limited on behalf of O'Kane Property Ltd makes a representation on an existing site on the edge of Hillhall, noting Policy ED4 and its comments on the redevelopment of established economic development in the countryside.</p> <p>The Representation states that this proposal would be in broad compliance with policy ED4 and they would not oppose it. However, ED4 should include an allowance for housing in the countryside where it forms part of a wider mixed-use regeneration scheme at the edge of a rural settlement. The following text should be included: "In exceptional cases, proposals for industrial redevelopment on the edge of small settlements may include an element of residential use where it is demonstrated that residential use is of a scale and nature consistent with the character of the adjoining settlement".</p>	<p>The Council notes the comments, however the aim of Operational Policy ED4 is to support and reinvigorate established economic uses on sites outside settlement limits. Such redevelopment for continued employment uses supports the regional strategic objectives for development in the countryside, as set out in the SPPS paragraph 6.66. These include:</p> <ul style="list-style-type: none"> <li>• manage growth to achieve appropriate and sustainable patterns of development which supports a vibrant rural community;</li> <li>• conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution;</li> <li>• facilitate development which contributes to a sustainable rural economy; and</li> <li>• promote high standards in the design, siting and landscaping of development.</li> </ul> <p>Policy ED4 sets out those uses acceptable on established economic sites that accord with the types of uses reflected in the SPPS. Policy ED4 is not a means to circumvent those countryside policies and objectives of the SPPS, or policies COU2 to COU10 in Part 2 of the dPS, which relate to housing in the countryside.</p>

	<p>Policy ED4 is supportive of economic development and it should be noted that in the final paragraph of the policy, other alternative uses are listed which will be viewed sympathetically where all the criteria can be met. The Council considers the policy is not inflexible as suggested. As such the Council does not intend to amend this policy.</p>
<p>NIEA comment regarding Policy ED4: Criteria d) should be amended by removing the word 'significantly'. This may leave the Council open to debate/question. It may be preferable to state that "the overall visual impact of replacement buildings must not have a visual impact greater than 5% of the building to be replaced".</p>	<p>The Council notes the comment. The regional strategic policy approach requires all development in the countryside to integrate into its setting, respect rural character, and be appropriately designed (paragraph 6.70. page 52 of the SPPS). The word 'significantly' has been used in the SPPS in relation to replacement dwellings (paragraph 6.73, page 53 of the SPPS), no equivalent has been provided for replacement of non-residential buildings. However, it is a requirement under existing policy PED4 part (d) of PPS4. To meet the approach set out in paragraph 6.70 it is considered necessary to use the word significantly in this policy for the same planning reason that it is used in Policy COU3 for Replacement Dwellings for the purposes of complying with paragraph 6.70 of the SPPS. Introducing a figure, as suggested, is considered too prescriptive and may not be required in all cases. The Council does not therefore intend to amend the wording of the policy for the above reasons.</p>
<p>Invest NI supports the policy as it is consistent with existing policy PED4 of PPS4. However, it is noted that the proposed policy removed the exemption in exceptional circumstances for permitting development for proposals for social and affordable housing.</p>	<p>The Council notes the point however advises that the exception in PED4 is captured within Operational Policy COU5 Affordable Housing on page 34. In so doing Council has removed the cross referencing of policies that appeared in PED4 of PPS4 which required a social and affordable housing proposal to comply with PPS21.</p>
<p>Dfl comment that whilst the policy advises that the 'redevelopment of an established industrial or business site for storage or distribution purposes will only be permitted in exceptional circumstances', the policy does not elaborate on what are considered to be exceptional circumstances. In addition, the J&amp;A outlines the exceptions that will be permitted for small-scale proposals for storage and distribution uses. The inclusion of the details of exceptions detailed in the J&amp;A, within the policy wording, may have</p>	<p>The Council notes the comment but considers that the words 'exceptional circumstances' within the body of the policy text are adequately amplified by the text in paragraph 3 of the J&amp;A. The Council does not therefore propose to further expand upon the policy text of ED4 as suggested.</p>

<p>been of benefit to the understanding of this policy and its implementation. Furthermore, it is unclear if these references to storage and distribution uses are related. However, the Council should ensure that any exceptions do not undermine the policy intention.</p>	
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## Operational Policy ED5 Major Economic Development in the Countryside

There were three representations received in respect of Operational Policy ED5 Major Economic Development in the Countryside.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-064	Invest Northern Ireland (Invest NI)
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the sequential approach for economic development with land within settlements being considered first before open countryside sites are investigated	The Council welcomes the supportive comment.
Invest NI supports Policy ED5 as it is consistent with existing PPS4 Policy PED5 – Major Economic Development in the Countryside.	The Council welcomes the supportive comment.
Dfi comments that the policy identifies criteria (a) to (c) which should be considered, however there is no cross reference to the General Policy ED9. For example, integration and landscape mitigation for major economic development proposals in the countryside would be an important consideration.	The Preamble on page 3 of Part 2 of the draft Plan Strategy states that for the purposes of ensuring sustainable development these operational policies must not be read in isolation from one another. Operational Policy ED9 General Criteria for Economic Development applies to all economic development (Operational Policies ED1 to ED8) and a planning application will therefore be required to meet all the criteria identified under Operational Policy ED9.



## Operational Policy ED6 Small Rural Projects

There were two representations received in respect of Operational Policy ED6 Small Rural Projects.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-064	Invest Northern Ireland (Invest NI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE support the sequential approach for economic development with land within settlements being considered first before open countryside sites are investigated.	The Council welcomes the supportive comment.
Invest NI support Policy ED6 as it is consistent with existing Policy PED6 – Small Rural Projects of PPS4.	The Council welcomes the supportive comment.

## Operational Policy ED7 Retention of Zoned Land and Economic Development

There were five representations received in respect of Operational Policy ED7 Retention of Zoned Land and Economic Development

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-064	Invest Northern Ireland (Invest NI)
DPS-082	Clyde Shanks on behalf of John Thompson & Sons Ltd
DPS-083	Agent
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>NIHE support the designation and supply of employment land to support job growth and also supports the presumption against alternative use of land zoned for economic development. However, NIHE would like to see the policy state that if employment land is to be released for alternative uses, it would need to be ensured that an adequate supply of employment land is retained to meet the needs of the Council District.</p>	<p>The Council notes the comment however does not agree to the addition to the policy as suggested. The thrust of the policy is to retain zoned land/buildings for employment use, loss to other uses is only by exception. The Monitoring Framework, page 176 Appendix E of Part 1 of the dPS ensures that enough land is retained for economic development uses. The Annual Employment Land Monitor will be a useful tool to monitor the supply of employment land and ensure the retention of necessary zoned lands which will be designated at LPP stage.</p>
<p>Invest NI comment that Policy ED7 is largely consistent with Policy PED7 of PPS4. It is noted that on <b>Unzoned Land in Settlements</b>, residential or community uses may be included in regeneration where development of land also includes a significant amount of economic use. Guidance on the extent to which the term <b>significant</b> might apply would be helpful.</p> <p>Invest NI reiterates comments made in response to the POP on the important health and safety considerations which need to be taken into account around industrial/business facilities particularly in respect of traffic and accessibility.</p>	<p>The Council notes the comment. The word 'significant' in this case is carried forward from PED7 of PPS4 into Operational Policy ED7 of Part 2 of the dPS. The Council considers that whilst it may be argued it is subjective, that the policy provides sufficient flexibility to consider, by exception, such uses as permitted on a site by site basis.</p> <p>The Council notes the comment and considers health and safety considerations are adequately addressed through Operational Policy ED9 General Criteria and its implementation. Proposals meeting the criteria set out in this policy such as impact on amenity, flood risk, noise nuisance, the safety of the road network including access arrangements, parking, landscaping and integration etc will take account of health and safety issues.</p>

<p>Policy ED7 does not include provision for the re-use or redevelopment of an economic development use or site on unzoned land in the countryside. They do acknowledge that this could be considered under a separate policy.</p>	<p>The Council would point out that the re-use or redevelopment of economic development sites in the countryside are dealt with in Operational Policies ED3 and ED4.</p>
<p>Clyde Shanks on behalf of John Thompson &amp; Sons Ltd broadly supports Policy ED7 seeking to retain the additional flexibility on previously developed, unzoned industrial land that was introduced in the SPPS.</p> <p>They ask that the wording of criteria (b) for <b>Unzoned Land in Settlements</b>, be amended to take account of market reality that in the majority of cases the reason that these sites are no longer in industrial use is because they are no longer economically viable or are compromised due to size, location, proximity to existing sensitive receptors.</p> <p>The wording in criteria (b) ‘and which will bring substantial community benefits that outweigh the loss of land for economic development use’ creates a high bar for mixed use proposals to overcome. It is also unhelpful that the J&amp;A provides no examples of what might be considered a substantial community benefit.</p> <p>The representation states than when it comes to showing the zoning of economic/industry land on maps (LCCC note this is to be done at LPP stage) that no confusion should exist between <b>Zoned Land in all Locations</b> and <b>Unzoned Land in Settlements</b>. In BMAP all industrial sites, whether existing or proposed</p>	<p>The Council notes the comments however would point out that the policy seeks to ensure that any alternative use complies with the intention of the policy itself, to retain employment land, which is in accordance with paragraph 6.89 of the SPPS. In addition paragraph 6.89 is clear that any decision to reallocate such zoned land to other uses ought to be made through the LDP process (which the Council considers to be at the Local Policies Plan Stage).</p> <p>The Council considers the policy approach complies with Part 1 of the dPS, Strategic Policies SP01, Sustainable Development and SP11 Economic Development in Settlements and aligns with that of the SPPS paragraphs 6.82 and 6.89.</p> <p>The policy in fact recognises in criteria (d) and (e) (under Unzoned Land in Settlements) many of the issues raised in the representation. These are considerations that an applicant needs to demonstrate when seeking an alternative proposal on such sites.</p> <p>The Council acknowledges that the J&amp;A does not provide examples of what substantial community benefits may be. This is considered appropriate in order to provide sufficient flexibility in the determination of planning applications that may come forward which seek to achieve this aim. The Council does not intend to amend the wording of criteria (b) of Policy ED7 for the above reason, as each planning application will be determined on its merits having regard to the evidence demonstrated by an applicant.</p> <p>The Council notes the matter raised with regard to confusion of zoned/unzoned land on maps within BMAP. It is noted that BMAP did identify two <i>types</i> of employment zoning for ‘existing’ and ‘proposed’ employment land. It is intended at the Local Policies Plan stage to designate <i>all</i> employment land as a single zoning (either</p>

<p>were identified with a pink wash. This caused confusion as to whether or not the sites identified with the lighter shading, described in the key as Existing Employment/Industry fell to be considered as zoned land in policy terms. These sites should be assessed as unzoned land in the context of Policy ED7.</p>	<p>developed or not developed) in accordance with the 30 sites provided in the Employment Land Review. Any decision to reallocate zoned land to other uses where necessary will be carried out as part of the Local Policies Plan process in accordance with paragraph 6.89 of the SPPS.</p>
<p>An Agent makes reference to Policy ED7 Retention of Zoned Land and Economic Development stating that this policy will prevent the development of certain types of sites that historically would have been developable for other uses including residential development and restrict the potential for windfall sites to come forward for other uses.</p>	<p>In noting the comments the Council reiterates the comments made in its consideration above. This policy does not preclude any proposal on existing economic sites provided it is demonstrated that it will bring forward a substantial community benefit. This may include part use of the site for some form of residential or community use.</p> <p>The Council considers the policy approach complies with Part 1 of the dPS, Strategic Policies SP01, Sustainable Development and SP11 Economic Development in Settlements and aligns with that of the SPPS paragraphs 6.82 and 6.89.</p>
<p>Dfl acknowledges the policy seeks to align with regional and strategic planning policy, however the Council are reminded that in instances where proposals would result in the loss of land zoned for economic development use these should not normally be granted. Any decision to reallocate such zoned land to other such uses undermine the policy intention of ED7 for Retention of Zoned Land and Economic Development.</p> <p>In relation to unzoned land, the Council refer specifically to the loss of B2, B3 or B4 uses. The SPPS (paragraph 6.89) refers to unzoned land in settlements in current economic development use (or land last used for these purposes). Council should satisfy themselves that the draft policy covers all economic development uses that it is intended for.</p>	<p>The Council notes the comments however would point out that the policy seeks to ensure that any alternative use complies with the intention of the policy itself, to retain employment land, which is in accordance with paragraph 6.89 of the SPPS. In addition paragraph 6.89 is clear that any decision to reallocate such zoned land to other uses ought to be made through the LDP process (which the Council considers to be at the Local Policies Plan Stage).</p> <p>In relation to unzoned land in settlements, the Council acknowledges the difference in wording between the policy and that provided in paragraph 6.89 of the SPPS. The Council proposes for clarity, as a focussed change, to amend Policy ED7, page 48, as follows:  <b>“Unzoned Land in Settlements</b>  On unzoned land a development proposal that would result in the loss of an existing Class B2, B3 or B4 use, <i>or land last used for these purposes</i>, will only be permitted where it is demonstrated that...”  (Ref: FC7 Focussed Changes Schedule)</p>

## Operational Policy ED8 Development Incompatible with Economic Development Uses

There were three representations received in respect of Operational Policy ED8 Development Incompatible with Economic Development Uses.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-064	Invest Northern Ireland (Invest NI)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE support Policy ED8 to assess compatibility of a proposal adjacent to economic development. This can protect residential amenity and any impacts from industrial emissions, noise or heavy traffic.	The Council welcomes the supportive comment.
Invest NI comment that policy ED8 is consistent with Policy PED8 – Development Incompatible with Economic Development Uses of PPS4.	The Council welcomes the supportive comment.
DfI acknowledges that the Council’s policy is reflective of paragraph 6.90 of the SPPS, however the SPPS provides a number of examples whereby a development proposal might be considered incompatible with nearby economic development or other uses. The Council may wish to consider the inclusion of examples of incompatible development to provide greater clarity.	The Council notes the comment but does not see a need to expand on this point within the J&A as, has been pointed out by DfI, these examples are already quoted within paragraph 6.90 the SPPS. The Council’s operational policies and accompanying J&A must be read in conjunction with the policies of the SPPS (paragraph 1.5, page 6), which are material to decisions on planning applications and appeals. Should clarification on the matter arise, the SPPS is the fallback position and the Council therefore sees no need to repeat these within the J&A to this policy.

## Operational Policy ED9 General Criteria for Economic Development

There were three representations received in respect of Operational Policy ED9 General Criteria for Economic Development.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-064	Invest Northern Ireland (Invest NI)
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>NIHE support Policy ED9 but would like to see a policy that encourages social clauses, for major development to deliver positive social benefits. These clauses can secure employment opportunities, and training and skills development for local unemployed or underemployed residents. The use of social clauses is often employed in GB. It should be noted that the Department of Finance, in conjunction with the Construction Industry Forum for NI, has drawn up guidance and model contracts on sustainable construction. The aim is to “promote social inclusion and equal opportunities, including the progression of unemployed people and those leaving education and training, as a way of delivering social elements of sustainable development”.</p>	<p>The Council notes the suggested inclusion of social clauses. Policy ED9 is a spatial policy listing the criteria applicants should adhere to when considering a development proposal. The purpose of these criteria are for the general benefit of citizens in the Council area and nearby areas that may be negatively affected, thus providing a safeguard. The policy is not the mechanism to secure economic or social prosperity, rather a catalyst in ensuring appropriate physical development can occur to create opportunities for employment. The Council therefore considers that social clauses are beyond the remit of this operational policy but through their implementation a range of positive social benefits will result.</p>
<p>Invest NI comment that Policy ED9 is consistent with Policy PED9 – General Criteria for Economic Development of PPS4. However, with reference to criteria (j) Invest NI would reiterate previous comments concerning health and safety of pedestrians, cyclists and those unfamiliar with an industrial environment finding themselves in proximity to heavy industrial traffic and plant. In this regard designs should not encourage unauthorised personnel to travel through industrial areas.</p>	<p>The Council considers that Health and Safety considerations are adequately addressed through Operational Policy ED9 General Criteria and its implementation. Proposals meeting the criteria set out in this policy such as impact on amenity, flood risk, noise nuisance, the safety of the road network including access arrangements, parking, landscaping and integration etc will take account of health and safety issues.</p> <p>The policy is not encouraging of unrestricted access to sites, rather that there is an element of movement/permeability built into such sites to separate what is referred to as the incompatibility of ‘trikes and trucks’.</p>
<p>Dfi notes that this policy requires any economic development applications assessed under ED1-ED8 to also meet the criteria of ED9, however</p>	<p>The Preamble on page 3 of Part 2 of the draft Plan Strategy states that for the purposes of ensuring sustainable development these</p>

Council may wish to consider cross referencing throughout the document to ensure consistency.

operational policies must not be read in isolation from one another.

Operational Policy ED9 General Criteria for Economic Development applies to all economic development (Policies ED1 to ED8) and a planning application will therefore be required to meet all the criteria identified under Operational Policy ED9.

## 5. MINERALS DEVELOPMENT

### Operational Policy MD1 Environmental Protection

There were eight representations received in respect of Operational Policy MD1 Environmental Protection.

#### Respondents

Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council (ABC)
DPS-029	Minerals Products Association Northern Ireland (MPANI)
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-042	Conexpo (N.I.) Ltd
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-092	Department for Economy Petroleum Branch and Geological Survey NI (DfE)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (DfI)

#### Council Consideration of Issues Raised

Main Issue	Council Consideration
Armagh City, Banbridge and Craigavon Borough Council notes the overall policy approach to environmental protection within or close to an area that has been designated, or is proposed for designation to protect its landscape, scientific or natural heritage significance. ABC would welcome clarification on how Policies MD1 and MD3 (Areas of Mineral Constraint) relate to each other.	The Council considers Operational Policy MD1 is an overarching policy requiring demonstration of mineral development against the need for natural/historic environmental protection. Policy MD3 Areas of Mineral Constraint is a more restrictive policy, less favourable to minerals development than MD1. As stated on page 52 of the J&A, the Council will assess these as part of the development of the Local Policies Plan on the basis of evidence available. The two policies do not directly relate to each other except that their aim is the foremost protection of the environment.
MPANI and Conexpo (N.I.) Ltd question the use of wording under the J&A (page 51) where it states <i>"In all areas, decisions on mineral applications will be made with regard to the preservation of good quality agricultural land, tree and vegetation cover"</i> . The representations question the use of this wording. What is the definition of "good" agricultural land? Minerals can only be extracted where they occur and will only be exploited if those mineral reserves are of sufficient quantity, quality and value to the local economy. The representations also suggest that the J&A completely fails to	The Council notes the comment and acknowledges it would be clearer for the wording to align with paragraph 6.163 of the SPPS. The Council proposes for clarity, as a minor change, to amend paragraph 1 of the J&A of Policy MD1, page 51, as follows: <i>"In all <del>areas</del> circumstances decisions on mineral applications will be made with regard to the preservation of <del>good quality agricultural land</del> soil quality (where this is particularly suitable for agriculture), water quality, tree and vegetation cover, wildlife habitats, natural</i>



<p>recognise the positive contribution that mineral sites, both operational and appropriately restored can make to local biodiversity and wildlife. They would ask that the reference to "good agricultural land" is removed as it has no standing or definition within planning.</p>	<p>features of interest in the landscape and sites of archaeological and historic interest.”  <a href="#">(Ref: MC24A Minor Changes Schedule</a></p> <p>The Council recognises the contribution minerals make in its Strategic Policy 13 Mineral Development (Part 1) which seeks to balance its sustainable economic contribution against protection of the natural environment.</p>
<p>HED request in order to make Policy MD1 Environmental Protection more sound, the insertion of the word ‘built’ heritage into the policy intent. “Minerals development within or in close proximity to an area that has been designated, or is proposed for designation to protect its landscape, scientific, natural or <i>built</i> heritage significance will not normally be granted permission (with the exception of valuable minerals as set out in Policy MD4) where this would prejudice the essential character of the area and the rationale for its designation”.</p>	<p>The Council acknowledges it would be clearer for the policy wording to align with paragraph 6.152 of the SPPS. The Council proposes for clarity, as a focussed change, to amend Policy MD1, page 51, as follows:  “...Minerals development within or in close proximity to an area that has been designated, or is proposed for designation to protect its landscape, scientific, natural <i>or built</i> heritage significance will not normally be granted permission ...”  <a href="#">(Ref: FC8A Focussed Changes Schedule)</a></p>
<p>NIEA has concerns with the exception made for valuable minerals. They consider this exception conflicts with the Conservation (Natural Habitats etc.) Regulations (Northern Ireland) 1995 (known as the "Habitats Regulations"). This policy should clearly state within the J&amp;A that all Mineral Development satisfies operational Policy NH1, NH2, NH3, NH4 and NH5. There is no mention of procedures to be implemented for protection of natural heritage features should valuable minerals occur within a site.</p> <p>The J&amp;A states <i>"Permission for the extraction of peat for sale will only be granted where the proposals are consistent with the protection of boglands valuable to nature conservation interests"</i>. What is meant by consistent with the protection of bogland valuable to nature conservation interests? An area of inactive peatland, does not mean it is not capable of restoration, nor that it has little or no conservation/scientific interest and so therefore can be exploited.</p>	<p>The Council notes the comment in relation to valuable minerals and the conflict identified. The Council proposes for clarity, as a focussed change, to amend the last sentence of Policy MD1, page 51, as follows:  “Minerals development within or in close proximity to an area that has been designated, or is proposed for designation to protect its landscape, scientific of natural <i>or built</i> heritage significance will not normally be granted permission <del>(with the exception of valuable minerals as set out in policy MD4)</del> where this would prejudice the essential character of the area and the rationale for its designation.”  <a href="#">(Ref: FC8B Focussed Changes Schedule)</a></p> <p>In relation to the comment on boglands in the J&amp;A, the Council would point out that this wording has been carried forward from paragraph 6.158 of the SPPS, and therefore simply repeats the regional policy.</p>

<p>The Council has a duty under the WANE Act to further the conservation of Biodiversity. This policy should also specify that all other operational policies will have to be considered.</p>	<p>The Council recognises the importance of balancing considerations against the need to safeguard the environment. The Council proposes for clarity as a minor change, to insert the following sentence to the final paragraph of the J&amp;A of Policy MD1, page 51, as follows:  <i>“The Council, having regard to Environmental Impact Assessment (EIA), Habitats Regulations Assessment (HRA) and the Wildlife and Natural Environment Act (NI) 2011 (WANE), where necessary, will balance the case for a particular mineral working proposal against the need to protect and conserve the environment.”</i>  (Ref: MC24B Minor Changes Schedule)</p> <p>The Council does not consider it necessary to highlight cross referencing to NH policies as the preamble on page 3 highlights that each policy should not be read in isolation from one another.</p>
<p>DfE are largely in agreement with the policy given the intention to facilitate appropriate, sustainable development with no presumptions against proposals other than in areas of constraint. That there will be no presumption against development of high value minerals, even in areas of constraint is supported.</p>	<p>The Council welcomes the supportive comments. Please note Focussed Change FC8B to the policy as stated under the Council’s consideration to NIEA above. All valuable minerals are assessed taking account of the relevant legislative provisions as outlined.</p>
<p>RSPB NI requests that the policy excludes peat extraction; 'planning permission should not be granted for peat extraction from new or extended sites, or renew extant permissions'. Notably, the English National Planning Policy Framework has clear requirements which do not allow new or extended planning permission for peat extraction.</p> <p>Policy MD1 should be reworded as follows:  <i>'Applications for commercial extraction of peat including new or extended sites, or renewal of extant permissions will not accord with the Plan'.</i></p> <p>Should LCCC be minded to include any exceptions to this policy, this should be qualified as follows: <i>Exceptions may be made where the peat land is not reasonably capable of restoration, noting any peatland with a layer of peat of 0.5m or more is considered capable of restoration'.</i></p>	<p>The Council notes the comments in the representation seeking no peat extraction from new or extended sites, and that this is in accordance with the NPPF. Whilst that may be the case in England it is not the case in Northern Ireland. The SPPS paragraph 6.154 states: <i>'The policy approach for minerals development, including peat extraction from bog lands, must be to balance the need for mineral resources against the need to protect and conserve the environment.'</i> The Council does not therefore intend to reword its policy as it accords with the regional policy position.</p>

<p><i>RSPB NI in seeking to ensure restoration of such sites, consider an additional line should be included within the policy as follows: 'The developer will need to demonstrate that the proposed management structures and finance are in place for the restoration of these sites. In such cases, a planning agreement between relevant parties may be required'. The prospect of site restoration should not be used as a justification for extraction in the first place.</i></p> <p>In addition to ensuring the financial provision for restoration and aftercare, the LDP should also provide the framework to facilitate regular inspection to ensure such plans are followed through to delivery. In the circumstances, it is recommended that an additional line is added to Policy MD1 as follows: <i>'Access to the site shall be provided at all reasonable times by the applicant/operator for inspection by LCCC officials (or other appropriate body) to ensure restoration and aftercare plans have been Implemented in accordance with the planning permission'.</i></p> <p>The above amendments will be in general conformity with the SPPS to work towards the restoration of and halting the loss of biodiversity, in addition to the statutory duty placed on every public body to further the conservation of biodiversity (as articulated by the WANE Act 2011), while complying with the Habitats Directive, and the NI and EU Biodiversity Strategies. Notably, the SPPS at paragraph 6.171 goes on to state 'all of us share the collective responsibility to preserve and improve the natural environment and halt the loss of biodiversity for the benefits of future generations'.</p>	<p>The Council does not consider this suggestion is necessary as Operational Policy MD9 deals with the issue of restoration.</p> <p>The Council considers that, if necessary, this would be reflected in a condition to be applied to an approval, not as a policy requisite against which a proposal is to be assessed. Planning enforcement can, if necessary, act on such a condition that reads with restoration and aftercare plans. The manner of restoration (capping etc) is controlled by the functions of 'other appropriate bodies' and their legislation i.e. it is not related to planning and should not be reflected in either a planning condition or planning policy.</p> <p>The Council agrees there is a collective responsibility for all to preserve and improve the natural environment for sustainability. The dPS represents the Council's policy approach to encouraging sustainable development in accordance with the SPPS. Please note Minor Change MC24B to the J&amp;A proposed under the Council's consideration to NIEA comments above.</p>
<p>Dfl notes this policy aligns with paragraph 6.158 of the SPPS, however it omits reference to Peat extraction, although referenced within the J&amp;A. The Department considers that this should be within the policy, in line with the SPPS requirement to safeguard mineral resources which are of economic or conservation value. Furthermore, the Council highlights the need to safeguard the environment in Policy SP13 'Mineral Development'.</p>	<p>The Council notes the comment and agrees that the policy would benefit from aligning it in accordance with paragraph 6.158 of the SPPS. The Council proposes for clarity as a minor change, to remove the second paragraph of the J&amp;A and place it in Policy MD1 (last paragraph), page 51, as follows: <i>"Permission for the extraction of peat for sale will only be granted where the proposals are consistent with the protection of boglands</i></p>

	<p><i>valuable to nature conservation interests, and with the protection of landscape quality particularly in AONBs.”</i> (Ref: MC24C Minor Changes Schedule)</p>
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## Operational Policy MD2 Visual Impact

There were two representations received in respect of Operational Policy MD2 Visual Impact

### Respondents

Reference Number	Respondent
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-092	Department for Economy Petroleum Branch and Geological Survey NI (DfE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIEA welcomes policy which will protect landscape quality by attaching conditions designed to avoid or mitigate adverse visual impacts.	The Council welcomes the supportive comment.
DfE are largely in agreement with the Minerals Development operational policies.	The Council welcomes the supportive comment.

## Operational Policy MD3 Areas of Mineral Constraint

There were seven representations received in respect of Operational Policy MD3 Areas of Mineral Constraint.

### Respondents

Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council
DPS-022	Newry Mourne & Down District Council
DPS-029	Minerals Products Association Northern Ireland (MPANI)
DPS-042	Conexpo (N.I.) Ltd
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-092	Department for Economy Petroleum Branch and Geological Survey NI (DfE)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Armagh City, Banbridge and Craigavon Borough Council, further to its comments on Strategic Policy 13, notes the policy approach and that further work in identifying any such areas will be taken forward at LPP stage.	The Council notes the comment and will continue to engage with neighbouring councils regarding the identifying of such areas at the next stage of the LDP.
Newry Mourne & Down District Council notes the Operational Policy. It is acknowledged that the areas most at risk in terms of environmental impact include the existing Area of High Scenic Value of Magheraknock Loughs which is a designation that extends into Newry Mourne & Down District Council. In respect of this, discussion is welcomed in future work identifying areas of mineral constraint.	The Council notes the comments and will continue to engage with neighbouring councils regarding the identifying of such areas at the next stage of the LDP.
MPANI and Conexpo (N.I.) Ltd, both welcome the approach under MD3 that Areas of Mineral Constraint will be dealt with in the Local Policies Plan.	The Council notes the supportive comments.
NIEA welcomes the proposals to limit extraction of minerals in certain areas, however there are concerns with the potential of exceptions for valuable minerals and extraction which are limited to the short term. The exceptions may come into conflict with the Habitats Regulations. At what point does the short term become long term, and could development get around this policy by repeatedly submitting short term application proposals? This policy should also specify that all other operational policies will have to be considered.	The Council notes the comments. The Council's wording regarding exceptions is taken from paragraph 6.164 of the SPPS which states: " <i>For example, an exception to minerals development could be justified within an area of constraint where the proposed operations are limited to short term extraction and the environmental/amenity impacts are not significant. In such cases, on-site processing of the excavated material is unlikely to be appropriate.</i> " Any exception is considered on a case-by-case basis and the cumulative impact of repeat short term applications. As stated in

	<p>the Preamble on page 3, all other relevant operational policies apply to all development proposals and no policy will be read in isolation to all other policies.</p>
<p>DfE are largely in agreement with the Minerals Development operational policies given that they are intended to facilitate appropriate, sustainable development with no presumptions against proposals other than in areas of constraint. The intention that there will be no presumption against proposals for development of high value minerals, even in areas of constraint is supported.</p>	<p>The Council welcomes the supportive comments. Please see the Council's consideration of Operational Policy MD4 in relation to Valuable Minerals.</p>
<p>DfI refer to the SPPS (paragraph 6.155) which states that LDPs should identify Areas of Constraint on Minerals Development (ACMDs), and that 'there should be a general presumption against minerals development in such areas'.</p> <p>The Council stipulates that ACMDs 'will be subject to review at the Local Policies plan', however, it is unclear whether or not there are existing ACMDs within the Council area to be carried forward. SP13 set out in Part 1 of the draft PS acknowledges that further work in identifying mineral safeguarding areas and areas of mineral constraint will be taken forward at LPP stage.</p>	<p>The Council notes the comments and as referred to under Strategic Policy SP13 Mineral Development, areas of constraint on minerals development (ACMDs) were identified in draft BMAP but removed from the 'final' post-examination BMAP. These therefore remain a material consideration in accordance with draft BMAP.</p> <p>Such areas will be defined at the LPP stage subject to information from Central Government on the extent of Areas of Mineral Constraint being made available. The Council considers that no change is necessary to either SP13 Mineral Development or operational Policy MD3 Areas of Constraint on Mineral Development.</p>

## Operational Policy MD4 Valuable Minerals

There were three representations received in respect of Operational Policy MD4 Valuable Minerals

### Respondents

Reference Number	Respondent
DPS-022	Newry Mourne & Down District Council
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-092	Department for Economy Minerals and Petroleum Branch and Geological Survey NI (DfE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Newry Mourne & Down District Council notes the Operational Policy on Valuable Minerals. It is acknowledged that the areas most at risk in terms of environmental impact include the existing Area of High Scenic Value of Magheraknock Loughs which is a designation which extends into NM&D District. In respect of this, discussion is welcomed in future work identifying areas of mineral constraint.	The Council notes the comments and will continue to engage with neighbouring councils regarding the identifying of such areas at the next stage of the LDP.
NIEA has concerns with the protection of the natural heritage features should valuable minerals occur within a site and how their protection will be managed. This policy should also specify that all other operational policies will have to be considered.	The Council notes the comments. The Council's wording regarding valuable minerals has been taken from paragraph 6.157 of the SPPS which states <i>"There will not be a presumption against their exploitation in any area, however in considering a proposal where the site is within a statutory policy area, due weight will be given to the reason for the statutory zoning."</i> The policy does therefore note that due weight will be given to any proposal in a designated area. Natural heritage features, both inside and outside of a designation are still protected in accordance with the Natural Heritage policies of this dPS. As stated in the Preamble on page 3, all other relevant operational policies apply to all development proposals and no policy will be read in isolation to all other policies. The Council proposes for clarity, as a minor change, to amend the last sentence of the J&A of Policy MD4, page 52 as follows: <i>"Applications are likely to be subject to assessment under the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017, and other assessments as outlined in the Justification and Amplification of Policy MD1."</i>



	<a href="#">(Ref: MC25 Minor Changes Schedule)</a>
DfE are largely in agreement with the Minerals Development operational policies given that they are intended to facilitate appropriate, sustainable development with no presumptions against proposals other than in areas of constraint. The intention that there will be no presumption against proposals for development of high value minerals, even in areas of constraint is supported.	<p>The Council welcomes the supportive comment.</p> <p>Please note Focussed Change FC8B to the policy as stated under the Council’s consideration to NIEA under Operational Policy MD1. All valuable minerals are assessed taking account of the relevant legislative provisions as outlined.</p>

## Operational Policy MD5 Unconventional Hydrocarbon Extraction

There were three representations received in respect of Operational Policy MD5 Unconventional Hydrocarbon Extraction.

### Respondents

Reference Number	Respondent
DPS-022	Newry Mourne & Down District Council
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-092	Department for Economy Minerals and Petroleum Branch and Geological Survey NI (DfE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Newry Mourne & Down District Council notes the Operational Policy on Unconventional Hydrocarbon Extraction.	The Council notes the comments and will continue to engage with neighbouring councils as it progresses to the next stage of the LDP.
NIEA state that this policy only prevents exploitation of hydrocarbons until there is sufficient and robust evidence on all environmental impacts. They have concerns how the council intends to monitor for sufficient and robust evidence of environmental impacts and how this will be implemented within a site. This policy should specify that all other operational policies will have to be considered.	The Council bases its decisions on any proposed development through an assessment of planning policy, informed by advice from statutory consultees. These are primarily central government departments which, currently, are of the view that extraction should not occur until evidence exists that environmental impacts are not significant. If that advice changes extraction proposals will be considered against the Council's full suite of operational planning policies and legislative requirements around environmental issues.
DfE are largely in agreement with the Minerals Development operational policies.	The Council notes the supportive comment.

## Operational Policy MD6 Mineral Safeguarding Areas

There were two representations received in respect of Operational Policy MD6 Areas of Mineral Safeguarding Areas.

### Respondents

Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council (ABC)
DPS-092	Department for Economy Minerals and Petroleum Branch and Geological Survey NI (DfE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Armagh City, Banbridge and Craigavon Borough Council supports the approach taken with Mineral Safeguarding Areas, to protect workable mineral resources of economic or conservation value from being sterilised by other surface development. This will contribute towards a sustainable approach to mineral development in line with the SPPS that supports the local and regional supply chain and overall economic growth. It is noted that these Mineral Safeguarding Areas will be taken forward (proposed) at Local Policies Plan stage as appropriate.	The Council notes the supportive comments and will continue to engage with neighbouring councils as it progresses to the next stage of the LDP.
DfE are largely in agreement with the Minerals Development operational policies.	The Council welcomes the supportive comment.

## Operational Policy MD7 Safety and Amenity

There was one representation received in respect of Operational Policy MD7 Safety and Amenity.

### Respondents

Reference Number	Respondent
DPS-092	Department for Economy Minerals and Petroleum Branch and Geological Survey NI (DfE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
DfE are largely in agreement with the Minerals Development operational policies.	The Council welcomes the supportive comment.

## Operational Policy MD8 Traffic Implications

There was one representation received in respect of Operational Policy MD8 Traffic Implications.

### Respondents

Reference Number	Respondent
DPS-092	Department for Economy Minerals and Petroleum Branch and Geological Survey NI (DfE)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
DfE are largely in agreement with the Minerals Development operational policies.	The Council welcomes the supportive comment.

## Operational Policy MD9 Restoration Proposals

There were five representations received in respect of Operational Policy MD9 Restoration Proposals.

### Respondents

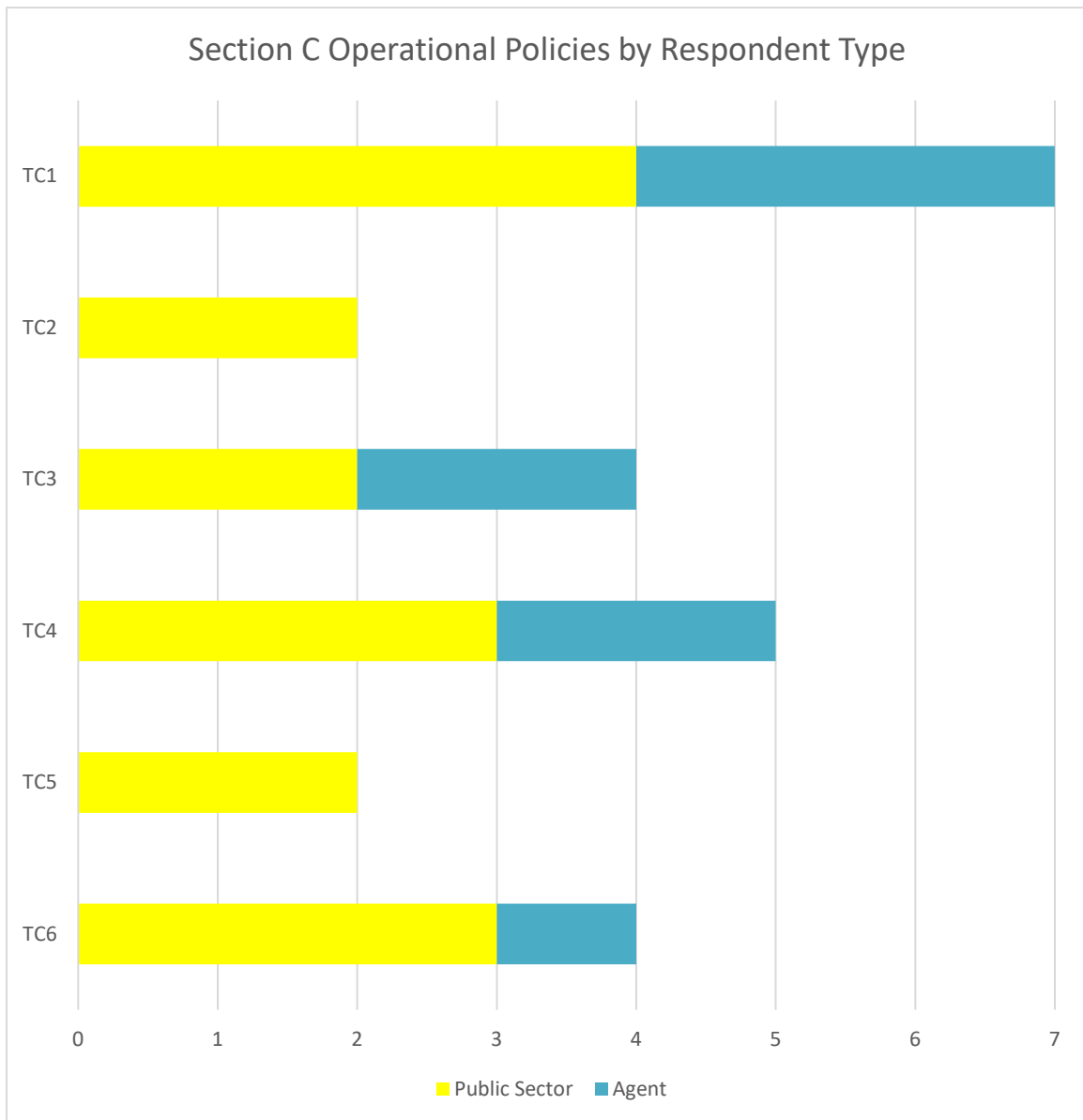
Reference Number	Respondent
DPS-029	Minerals Products Association Northern Ireland (MPANI)
DPS-042	Conexpo (N.I.) Ltd
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-092	Department for Economy Minerals and Petroleum Branch and Geological Survey NI (DfE)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
MPANI and Conexpo (N.I.) Ltd, welcome the proposal under MD9 that each application must include satisfactory restoration proposals. However, restoration requirements, as part of planning conditions, must be enforced by the Council.	The Council has the authority to impose appropriate planning conditions to any development and subsequent restoration proposals. In applying such conditions the Council has the appropriate powers of planning enforcement to ensure compliance or legal action taken where compliance does not occur.
NIEA highlights in the J&A, page 53, 1st paragraph that the term “the surrounding landscape” should be amended to “the surrounding landscape character”.	The Council notes the suggestion however would point out that the Council has taken this sentence verbatim from paragraph 6.161, page 78 of the SPPS which states: “The preferred types of reclamation and after use depend on a number of factors, including...the surrounding landscape...” As such the Council does not propose to amend the wording as suggested.
DfE are largely in agreement with the Minerals Development operational policies.	The Council welcomes the supportive comment.
RSPB NI state they are extremely disappointed that the policy only requires 'satisfactory restoration proposals', the preferred type of reclamation depending on a number of factors including inter alia 'the potential for nature conservation and biodiversity on the site'	The Council notes the concern, however would point out that Policy MD9 is in accordance with paragraph 6.161 of the SPPS which states: “Applications for extractions of minerals must include satisfactory restoration proposals.” As such the Council does not intend to delete or amend the use of the word ‘satisfactory’.
Modifications (i) Policy MD 9 should be amended to <i>require enhanced biodiversity in every case of restoration</i> . Such a requirement is considered to be in general conformity with the SPPS to work towards the restoration of and halting the loss of biodiversity, in addition to the statutory duty placed on every public body to further the	The Council also does not agree that the policy requires additional wording to enhance biodiversity. The J&A accompanying Policy MD9 sets out appropriate examples of the types of reclamation and after uses of mineral workings. One such example within paragraph 1 of the J&A is the potential for nature

<p>conservation of biodiversity (as articulated by the WANE Act 2011), while complying with the Habitats Directive, and the NI and EU Biodiversity Strategies, and international Aichi Targets.</p>	<p>conservation and biodiversity. The Council therefore considers it is not necessary to enhance the wording of the policy in this case.</p>
<p>RSPB NI welcomes restoration of sites by imposition of appropriate conditions but this should be extended to include reference to Section 76 Agreement, if necessary, for robustness. The policy also needs to ensure that financial provision for restoration and aftercare is guaranteed through Legal Agreement, and that a framework to facilitate regular inspection to ensure such plans are followed through to delivery. This is to ensure that any development is furthering sustainable development as required by the RDS and SPPS and will comply with the Biodiversity duty set out at Section 1 of the Wildlife and Natural Environment (WANE) Act (NI) 2011 on public bodies.</p> <p>Modifications</p> <p>In the circumstances, it is recommended that an additional line is added to the last sentence of paragraph 2 of the J&amp;A on page 53 (dPS Part 2) as follows; ‘Such provisions must be underpinned by appropriate conditions attached to any grant of planning permission, <i>or if necessary, a Section 76 Planning Agreement. The Council will require a financial guarantee in the form of a bond where there are legitimate concerns over an operator's financial security, or where the progressive restoration of the site is not being implemented In line with previous planning conditions and/or a planning agreement.</i>’ <i>Access to the site shall be provided at all reasonable times by the applicant/operator for inspection by LCCC/Departmental officials to ensure restoration and aftercare plans have been implemented in accordance with the planning permission’.</i></p>	<p>The Council considers the use of appropriate conditions attached to a planning permission negate the need for a Section 76. A Section 76 is only used where conditions cannot be imposed to secure the requirements of a development proposal, not as a means to ensure compliance if conditions are not met. Conditions are enforceable, including legal action if necessary, under planning legislation.</p> <p>Concerns over the financial security of a landowner/operator is not a planning matter, as a planning permission is granted over the land, not the owner/operator. The use of a bond therefore to ensure restoration in accordance with the permission (and its conditions) is not considered appropriate or as a means to enforce conditions imposed.</p> <p>It is a matter for the Government Department overseeing any waste licence associated with restoration of a site to ensure the requirements of that licence are being correctly implemented. This includes authorisation to enter a site to carry out mandatory inspection. There is no need therefore to include reference to this within the policy. In terms of enforcing planning conditions the Planning Act (NI) 2011 gives the Council the authority to enter the land for that purpose.</p>

**C: A VIBRANT PLACE**





## 6. TOWN CENTRES, RETAILING AND OTHER USES

### Policy TC1 Town Centres, Retailing and Other Uses

There were seven representations received in respect of Policy TC1 Town Centres, Retailing and Other Uses.

#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-036	Inaltus Limited on behalf of Drumkeen Holdings Ltd
DPS-041	Belfast City Council
DPS-061	Fleming Mounstephen Planning on behalf of Central Craigavon Ltd
DPS-066	One2One Planning on behalf of Forestside Acquisitions Ltd
DPS-084	Ards and North Down Borough Council
DPS-109	Department for Infrastructure (DfI)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE comment that they are supportive of the town centre first approach which reflects policy within the SPPS. They would like to see housing specified as an acceptable use in town centres as this can help promote the vitality and viability of centres.	<p>The Council welcomes the supportive comment.</p> <p>Please note that housing is an acceptable town centre use, as set out under criteria (c) and (d) of Policy HOU1. In both cases housing in town centres is promoted to increase the vitality and viability of these places. As housing is specified in other operational policy replication here is not necessary.</p> <p>The third paragraph of the Preamble on page 3 of Part 2 of the draft Plan Strategy sets out the following statement in relation to consideration of relevant policies: <i>“For the purposes of ensuring sustainable development these operational policies must not be read in isolation from one another. Proposals must comply with all policy requirements contained in the operational policies, where relevant to the development.”</i></p>
Inaltus on behalf of Drumkeen Holdings Ltd and One2One Planning on behalf of Forestside Acquisitions Ltd commented that TC1 should include District Centres as a location in the sequential approach so that the policy reflects the network and hierarchy of centres in the Council area.	<p>The Council notes the comments. The sequential approach adopted in this policy is reflective of the regional approach set out in paragraph 6.281 of the SPPS. Policy TC1 is intended to set the sequential approach in relation to proposals in city/town centres, but this is not intended to also include those other centres defined in the retailing hierarchy (page 97 Part 1 of draft Plan Strategy) which are provided for separately under Policies TC4 and TC5.</p>

	<p>The Council proposes for clarity, as a minor change, to amend Policy TC1, page 56, as follows:</p> <p>“c) edge of <i>city or</i> town centres  d) out of <del>town</del> centre locations – only where sites are accessible by a choice of good public transport.”</p> <p>J&amp;A, page 56, (paragraph 2 and 3 respectively):  “The provision of a <del>retail hierarchy</del> <i>sequential approach</i> enables a range of retailing opportunities appropriate to the needs of the community.”</p> <p>Business uses are encouraged as appropriate <del>in</del> <i>the hierarchy</i> to assist with urban regeneration, increase footfall and job creation.”  (Ref: MC26A Minor Changes Schedule)</p>
<p>Belfast City Council commented that TC1 was at cross purposes with SMU03. They suggest that because SMU03 in their opinion will make Sprucefield a de facto town centre that is in direct contravention of the sequential approach.</p>	<p>The Council recognises that no regional direction is provided on Sprucefield by the Department and the SPPS is silent in this regard. In the absence of such direction, the Council sought advice and as a result recognise it is the purpose of the Plan to define the role and function of Sprucefield as a regional shopping centre. Based on the evidence provided, the regional role is specified in SMU03 which is absent from regional policy documents. This is in accordance with its designated status in the RDS 2035.</p> <p>Sprucefield is outside the retail hierarchy due to its regional nature and this is made clear in footnote 21 on page 56, Part 2 of the dPS.</p>
<p>Fleming Mounstephen on behalf of Central Craigavon Ltd noted that Sprucefield is excluded from the retail hierarchy. They further comment that TC1 and SMU03 are in fact competing and contradictory. TC1 is based on a town centre approach whereas SMU03 is based on a capacity approach, with the role of Sprucefield being set by ‘its unique position within the region as a destination’ and not by regional policy.</p>	<p>The Council notes the comments that SMU03 is at odds with TC1, but would point out that Sprucefield falls outside the hierarchy of centres as set out in bullet point 1 of paragraph 6.277 of the SPPS. Further, in accordance with bullet point 3 of paragraph 6.277, the Council has set out appropriate policies that make clear which uses will be permitted in the hierarchy of centres and at other locations, which in this case is Sprucefield Regional Shopping Centre. Acceptable uses are those reflected by SMU03 in Part 1 of the dPS, pages 103 to 105. Strategic Mixed Use Policy SMU03 is also not in contravention of the sequential approach of Policy TC1 as it still requires proposals to discount the suitability of existing centres</p>

	<p>within the retail hierarchy through submission of a retail impact assessment under either its KSRs (b) or (c).</p> <p>The Council is therefore content that Policy TC1 is sound and does not contradict Policy SMU03, as suggested.</p>
<p>Ards and North Down Borough Council refer in general terms to Policies T1-T5 and in relation to Sprucefield Regional Shopping Centre, state that as the SPPS clearly indicates that retail cores remain first preference in the sequential approach, they remain unclear as to the need to include further land at Sprucefield</p>	<p>The Council notes the comment but would point out that Sprucefield falls outside the hierarchy of centres as set out in bullet point 1 of paragraph 6.277 of the SPPS. Strategic Mixed Use Policy SMU03 Sprucefield Regional Shopping Centre is also not in contravention of the sequential approach of Policy TC1 as it still requires proposals to discount the suitability of existing centres within the retail hierarchy through submission of a retail impact assessment under either its KSRs (b) or (c).</p>
<p>Dfl comment that the policy wording does not specifically refer to a town centre first approach although it is indicated that such an approach is being adopted – Council may wish to ensure that this is made clear within the policy wording.</p> <p>Council may wish to consider including the requirement for a RIA within the policy and not solely in the J&amp;A and should consider proposals which are marginally below the threshold.</p> <p>Dfl also commented that in relation to ‘edge of centre’ sites, the policy omits to include a default distance as per the SPPS. Council should either make reference to this and if there is a departure from that stipulated in the SPPS, Council should consider what distance is</p>	<p>The Council notes the comment and considers that the policy sufficiently promotes city and town centre uses and other uses as defined, and ensures a sequential approach is adopted for city and town centres.</p> <p>The Council notes the comment in relation to the RIA being provided within the policy rather than the J&amp;A. The Council considers that this provides sufficient clarification for those applications exceeding the stipulated threshold. That being said, details of RIA requirements are already quoted within paragraph 6.283 of the SPPS. The Council’s operational policies and accompanying J&amp;A must be read in conjunction with the policies of the SPPS (paragraph 1.5, page 6), which are material to decisions on planning applications and appeals. Should clarification on the matter, beyond what is contained in the J&amp;A, arise the SPPS policy is the fallback policy and the Council therefore sees no need to add the additional text to this policy.</p> <p>The Council notes the omission of the default distance (paragraph 6.287 SPPS). The Council proposes for clarity as a minor change to insert the following sentence into paragraph 2 of the J&amp;A of Policy TC1, Page 56, as follows:  “...Preference will then be given to an edge of centre location before considering an out of</p>

<p>appropriate and supported by the evidence base.</p> <p>Dfl also noted that Sprucefield Regional Shopping Centre is excluded from the hierarchy of centres and town centre first approach promoted by the SPPS, but acknowledged that strategic policy relating to Sprucefield is outlined in Part 1 of the dPS. Dfl commented there may be benefit in defining the Centre’s position within the retail hierarchy and that the policy should be clear it does not apply to Sprucefield Regional Shopping Centre.</p>	<p>centre location. <i>For a site to be considered as edge-of-centre a default distance threshold of 300 metres from the town centre boundary will apply.</i>” (Ref: MC26B Minor Changes Schedule)</p> <p>The Council notes the comments, but recognises that no regional direction is provided on Sprucefield by the Department and the SPPS is silent in this regard. In the absence of such direction, the Council sought advice and as a result recognise it is the purpose of the Plan to define the role and function of Sprucefield as a regional shopping centre. Based on the evidence provided, the regional role is specified in SMU03 which is absent from regional policy documents. This is in accordance with its designated status in the RDS 2035.</p> <p>Sprucefield is outside the retail hierarchy due to its regional nature and this is made clear in footnote 21 on page 56, Part 2 of the dPS.</p>
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## Policy TC2 Lisburn City Centre Primary Retail Core and Retail Frontage

There were two representations received in respect of Policy TC2 Lisburn City Centre Primary Retail Core and Retail Frontage.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE supports the Primary Retail Core and Retail Frontage but would like to see specific reference to residential use, such as LOTS, where planning permission for non-retail uses will be permitted on upper floors.	<p>The Council welcomes the supportive comment. The purpose of this policy is to maintain a strong retail offering within the primary retail core. Policy HOU1 does allow for non-retail uses on the upper floors and it is that policy which relates to the provision of city centre housing.</p> <p>The third paragraph of the Preamble on page 3 of Part 2 of the draft Plan Strategy sets out the following statement in relation to consideration of relevant policies: <i>“For the purposes of ensuring sustainable development these operational policies must not be read in isolation from one another. Proposals must comply with all policy requirements contained in the operational policies, where relevant to the development.”</i></p>
DfI commented that it is unclear how non-retail proposals that breach the 40% might be considered and greater clarity is needed on the practical application of the policy. Council should also consider the impact on the PRF and the unintended consequences for vitality and viability that the policy seeks to protect.	<p>The Council notes the comment but confirms that this policy is a relaxation of that contained within BMAP for Lisburn City Centre. The Council considered the existing Primary Retail Frontage (PRF) to establish the current baseline, which equates to just under 40% non-retail developments in the PRF. Without this policy requirement there would be no safeguarding of the PRF. It is however recognised that the role of city centres is facing challenging times and flexibility is required to adapt to changing circumstances. As such the Council proposes to revisit this matter during preparation of its Local Policies Plan at which time the situation for retailing and other town centre uses may be clearer.</p>

## Policy TC3 Town Centres

There were four representations received in respect of Policy TC3 Town Centres.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-041	Belfast City Council
DPS-061	Fleming Mounstephen Planning on behalf of Central Craigavon Ltd
DPS-066	One2One Planning on behalf of Forestside Acquisitions Ltd

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE are supportive of this policy but would like to see residential use promoted within existing town centres as well as retail, leisure and business uses.	The Council welcomes the supportive comment. The purpose of this policy is to promote retailing and other appropriate town centres uses, however as stated previously housing provision is permissible under policy HOU1. It is not considered necessary to list housing under this policy.
Belfast City Council comment that TC3 is at cross purposes with SMU03. They suggest that because SMU03 in their opinion will make Sprucefield a de facto town centre, that this is in direct contravention of the sequential approach.	<p>The Council recognises that no regional direction is provided on Sprucefield by the Department and the SPPS is silent in this regard. In the absence of such direction, the Council sought advice and as a result recognise it is the purpose of the Plan to define the role and function of Sprucefield as a regional shopping centre. Based on the evidence provided, the regional role is specified in SMU03 which is absent from regional policy documents. This is in accordance with its designated status in the RDS 2035.</p> <p>Sprucefield is outside the retail hierarchy due to its regional nature and this is made clear in footnote 21 on page 56, Part 2 of the DPS.</p> <p>In relation to the comment that SMU03 is at cross purposes with Operational Policy TC3 Town Centres, the Council disagrees, as it is clear that Sprucefield provides its own unique role compared to other traditional town centres.</p> <p>To ensure that developers have considered the particular circumstances of the centres within the catchment and whether an alternative site is suitable for the proposed development, they will be required to submit a Retail Impact</p>

	<p>Assessment and needs assessment for proposals over 1,000 square metres as specified under criteria c) of SMU03.</p> <p>The Council is content that the policies are sound and do not contradict one another as proposed.</p>
<p>Fleming Mounstephen on behalf of Central Craigavon Ltd notes that TC3 seeks to strengthen the role of Carryduff, Hillsborough and Moira with retail and town centre uses and the application of the sequential approach of Policy TC1.</p>	<p>The Council notes the comment and agrees that the policy seeks to strengthen the town centres.</p>
<p>One2One Planning on behalf of Forestside Acquisitions Ltd comment that TC3 excludes a threshold for the test of retail impact and introduces ambiguity by firstly cross-referencing the reader to Policy TC1, which excludes city centre sites and district centres, and then only in part replicating this policy by reference to sites within the town centres. This leaves the reader unsure if other locations within Policy TC1 are to be assessed. The cross reference to Policy TC1 is sufficient.</p>	<p>The Council notes the comments and accepts that the policy comments on proposals outside of town centres is potentially confusing in respect to what is already stated under Policy TC1. The purpose of this policy is simply to set out suitable criteria for proposals within town centres, and not to reiterate the sequential approach as set out in Policy TC1.</p> <p>The Council proposes for clarity, as a minor change, to amend paragraph 2 of Policy TC3, page 57, as follows:  “Beyond a designated town centre boundary, proposals for town centre uses will only be granted planning permission in accordance with the sequential approach of Policy TC1 <del>where it is demonstrated no suitable sites exist within the town centre, no adverse impact on the role and function of the town centre will occur as a result of the proposal</del> and there would be no adverse impact on adjacent land uses.”  (Ref: MC27 Minor Changes Schedule)</p>

## Policy TC4 District and Local Centres

There were five representations received in respect of Policy TC4 District and Local Centres.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-036	Inaltus Limited on behalf of Drumkeen Holdings Ltd
DPS-066	One2One Planning on behalf of Forestside Acquisitions Ltd
DPS-084	Ards and North Down Borough Council
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE comment that they are supportive of this policy.	The Council welcomes the supportive comment.
Inaltus on behalf of Drumkeen Holdings Ltd comment that TC4 should be amended to allow proposals that meet a 'defined retail need' as opposed to 'local need'. This change would reflect the findings of the Retail Capacity Study.	The Council notes the comment but considers the purpose of District and Local Centres is to provide local shopping that complements, rather than competes with the other hierarchy centres. This is clearly set out in the J&A and is in accordance with paragraph 6.276 of the SPPS which refers to these centres as a ' <i>focus for local everyday shopping</i> '. Inclusion of the text 'defined retail need' would be ambiguous to the intention of these centres and undermine their complementary role and status in relation to city and town centres. Additionally District and Local Centres not only cater for local retailing but provide a convenient local location for the provision of appropriate business and community development. The Council considers that to change the policy wording from 'local need' to 'defined retail need' undermines the purpose of these centres as being suitable for a variety of uses, not just retailing. As such the suggestion is not considered appropriate.
One2One Planning comment that District Centres form part of the retail hierarchy yet TC4 does not fulfil the obligation within the SPPS to provide policy guidance. There is no detail as to how: <ul style="list-style-type: none"> <li>Local need will be assessed</li> <li>The role and function of the centre</li> <li>How proposals for change of use within the centre are to be assessed.</li> </ul>	The Council notes the comments. Part 1 of the dPS confirms that Forestside District Centre forms part of the retail hierarchy, Figure 5 on page 97. Part 1 of the dPS, paragraphs 2 to 4, page 98 recognizes the importance of Forestside in the retail hierarchy. The SPPS, particularly paragraphs 6.276 and 6.277 provide a number of answers to the points raised. Paragraph 6.276, page 102, requires the applicant to demonstrate that 'no adverse impact will result on town centres in the



There is also no policy test for extensions to the district centre; or justification for the 400sqm threshold.

District Centres should have a policy distinct from that of Local Centres as Forestside operates at an entirely different level within the hierarchy and has advanced beyond the role of local convenience provision, with a significant level of comparison retailing and a catchment also significantly extending beyond local. TC4 offers no incentive for new business to locate in a District Centre over an out of centre site, nor is there any provision within these policies for retail impact on District Centres to be a material consideration in planning applications.

TC4 conflicts with the dPS of Belfast City Council as they set a District Centre first approach outside of the City Centre for major retail development. Potential conflict across Council boundaries

catchment', which addresses the local need issue. Bullet point 1 of paragraph 6.277 page 102, requires the Council to acknowledge the role and function of the centre, this has been provided in Part 1 of the dPS, page 98, paragraphs 2 to 4, as indicated above. Proposals for change of use within the centre would be considered in respect of points a) to d) of Policy TC4. With regard to a possible extension to the district centre, Part 1 of the dPS, page 98 states: 'Consideration of a possible extension to the District Centre boundary to consolidate and strengthen its role, focusing on the mix of office and retailing uses, will be considered at the Local Policies Plan stage.' In relation to the threshold for office floorspace, whilst already a policy requirement in BMAP, this is considered an applicable threshold in terms of providing a local need, as referred to on page 31 of Technical Supplement 4 Office Capacity Study.

The SPPS (paragraph 6.276) makes no differentiation between district and local centres. There is no guidance in Northern Ireland as to what defines these lower tier designations, and therefore little to differentiate them in terms of the policy requirements. The Council acknowledges the level of comparison shopping at Forestside (Part 1, page 98), but would point out that it is not a requirement of Policy TC4 that proposals should be for convenience retailing only. The policy requires there to be no adverse impact on the vitality and viability of existing centres in the catchment of the proposal, this effectively defines the extent of its 'locality' for the purposes of the policy.

Development proposals that are not to be located within city or town centres must go through the sequential approach of Policy TC1 (and as set out in para 6.281 of the SPPS) unless they are proposed within district or local centres. The Council contends this offers a greater incentive than an out of centre location. It is not considered that TC4 conflicts with the retailing approach of Belfast City Council and it should be noted that BCC did not identify this as a source of conflict within their representation.

<p>TC4 is not consistent with the evidence base. The Retail Capacity Study refers to the Castlereagh Urban Integrated Development Framework identifying Galwally House as an area which could support office development, however TC4 only permits up to 400sqm of office space.</p> <p>It is unjustified that TC4 requires proposals to demonstrate a local need for retail provision as the Retail Capacity Study supports additional comparison floorspace at the centre, rather than convenience floorspace, which is the class of goods that the J&amp;A text refers to. The dPS provides no robust manner in which to monitor how TC4 will assist the district centre to function appropriately at their level on the retail hierarchy.</p> <p>Suggested changes to the policy are as follows:</p> <ul style="list-style-type: none"> <li>• The Council will encourage and support a diverse range of retail and complementary uses within Forestside. Planning permission will be granted for retailing, business, leisure or community development proposals provided it is demonstrated that:</li> <li>• The proposal meets a local need</li> <li>• It would not adversely affect the vitality and viability of Lisburn city and town centres in the catchment area of the proposal</li> <li>• The proposal would not alter the role and function of the centre as demonstrated via an up to date health check</li> <li>• Proposed B1(a) Office proposals up to a maximum of 400spm will be permitted. Proposals individually or cumulatively of up to 1000 sqm gross external floor space will require a needs assessment; this includes applications for any extension(s).</li> </ul>	<p>The Castlereagh Urban Integrated Development Framework 2014 is a non-statutory document. The dPS is required to have regard to such plans and as such, the potential for future office development will be further considered at the Local Policies Plan stage.</p> <p>The Council notes this comment and has amended TC4 to acknowledge the role of District Centres in complementing the City and town centres. Further clarity is provided within the Council’s consideration to DfI’s representation, below (see MC28 Minor Changes Schedule).</p> <p>The Council notes the level of detail provided in the representation for the creation of a ‘site specific’ policy for Forestside. The Council considers this is a consideration for the Local Policies Plan, not the Plan Strategy. Further clarity is provided within the Council’s consideration to DfI’s representation, below.</p>
<p>Ards &amp; North Down Borough Council comment that the proposal in the dPS to support non bulky comparison in a local centre does not appear to be founded on a sound basis, in the context that local centres are primarily for convenience goods. They further commented that the technical supplement prepared to support the policy approach is inadequate as the scenarios for Sprucefield and Forestside are limited to the LCCC administrative area.</p>	<p>The Council notes the comments but would point out that the policy makes no reference to non-bulky or comparison goods retailing. Any retailing proposal must demonstrate that it meets a local need and does not affect the vitality and viability of existing centres within their catchment, regardless of these being within the Council’s administrative area. The J&amp;A does suggest in its 2<sup>nd</sup> paragraph, page 58 that these centres have a ‘primary convenience retailing role’, but this policy does</p>

	<p>not exclude comparison retailing, subject to the criteria mentioned above.</p> <p>Technical Supplement 5, Retail Capacity Study, paragraph 4.37, provides further evidence in this regard and forecasts that retail capacity in Forestside catchment could support modest additions to the comparison retail offer. This is not to the detriment of catchment areas beyond the administrative boundary, reflected in the policy's approach to protection of vitality and viability of all existing centres, regardless of their location.</p>
<p>DfI comment that the policy appears to be promotive of the expansion of these centres and that District and Local Centres are identical with regard to their role and function and is contrary to 6.276 of the SPPS.</p> <p>They comment that the J&amp;A states that Forestside District Centre and Dundonald Local Centre provide a focus for local shopping and offer a complementary role in providing shoppers with convenience and choice but conflicts with the Retail Hierarchy, as set out in Strategic Policy 14 (Figure 5) which acknowledges the differences between the two types of centre, as they do not share the same hierarchy level.</p> <p>Furthermore, the Department comment that the rationale behind the requirement for office developments to not exceed 400 square metres of gross floorspace is unclear, and the Council should be content this is justified by evidence. The Council should consider how development of this scale could be incorporated into the</p>	<p>The SPPS (paragraph 6.276) makes no differentiation between District and Local Centres. There is no guidance in Northern Ireland as to what defines these lower tier Plan designations, and therefore little to differentiate them in terms of the policy requirements.</p> <p>The extant Plan (BMAP) identifies that the main distinguishing feature between a District and Local Centre, is that a District Centre is one which is normally served by an anchor convenience store serving a wider catchment than a local centre. Definitions of both a District and Local Centre are provided in the glossary on page 120 and 121. It is not considered necessary to separate these centres as there is little to differentiate them in terms of the policy requirements. However, the Council considers that clarification regarding the role of a District Centre may be useful. The Council proposes for clarity, as a minor change, to include the following opening sentence to the J&amp;A of Policy TC4, page 57, as follows:</p> <p><i>“The role and function of a District Centre is to perform a complementary role for retailing and services to existing city and town centres; the role and function of a Local Centre is to provide a local level of retailing and services to cater for a local population.”</i></p> <p>(Ref: MC28 Minor Changes Schedule)</p> <p>In relation to the threshold for office floorspace, whilst already a policy requirement in BMAP, this is considered an applicable threshold in terms of providing a local need, as referred to on page 31 of Technical Supplement 4 Office Capacity Study.</p>

Dundonald Local Centre without impacting upon the role and function of the centre.

DfI further commented that the J&A also advises that both centres should not compete with other hierarchy centres, however, the Department considers that, by its very nature, Forestside District Centre is more than capable of doing so, and any expansion on the existing provision is likely to increase competition between this and other centres (including town and city centres) throughout LCCC and neighbouring council areas. The Department requested further clarification in relation to the role and function of the existing District and Local Centres.

DfI suggested the Council may wish to consider separating this policy to deal with 'District Centres' and 'Local Centres' individually.

With regard to a possible extension to the district centre, Part 1 of the dPS, page 98 states: *'Consideration of a possible extension to the District Centre boundary to consolidate and strengthen its role, focusing on the mix of office and retailing uses, will be considered at the Local Policies Plan stage.'*

## Policy TC5 Villages and Small Settlements

There were two representations received in respect of Policy TC5 Villages and Small Settlements.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE commented that they are supportive of this policy.	The Council welcomes the supportive comment.
DfI made a general comment that there is no operational policy to deal specifically with rural shops and that whilst TC5 is associated with proposals within Villages and Small Settlements, there is no reference to development outside these locations.	<p>The Council notes the comment. As per SP14 (dPS Part 1, page 96) a retail hierarchy is defined within our settlements whilst retailing in the countryside will be by exception, based on an identified need. Noting DfI's comment, the Council considers it necessary to be more explicit on this matter, despite operational policies for development in the countryside already making reference to instances where retailing would be acceptable. As such the Council proposes for clarity, as a minor change, to amend the fourth paragraph of Policy COU1, page 31, as follows:</p> <p><i>"There are a range of other non-residential development proposals that may in principle be acceptable in the countryside. Such proposals must comply with all policy requirements contained in the operational policies, where relevant to the development. <b>Development of inappropriate retailing in the countryside will be resisted. Retailing opportunities in the countryside will only be considered in relation to Policies COU11 and COU14 and, in exceptional cases Policy TC6.</b>"</i></p> <p>(Ref: MC29 Minor Changes Schedule)</p>

## Policy TC6 Petrol Filling Stations and Roadside Service Facilities

There were four representations received in respect of Policy TC6 Petrol Filling Stations and Roadside Service Facilities.

### Respondents

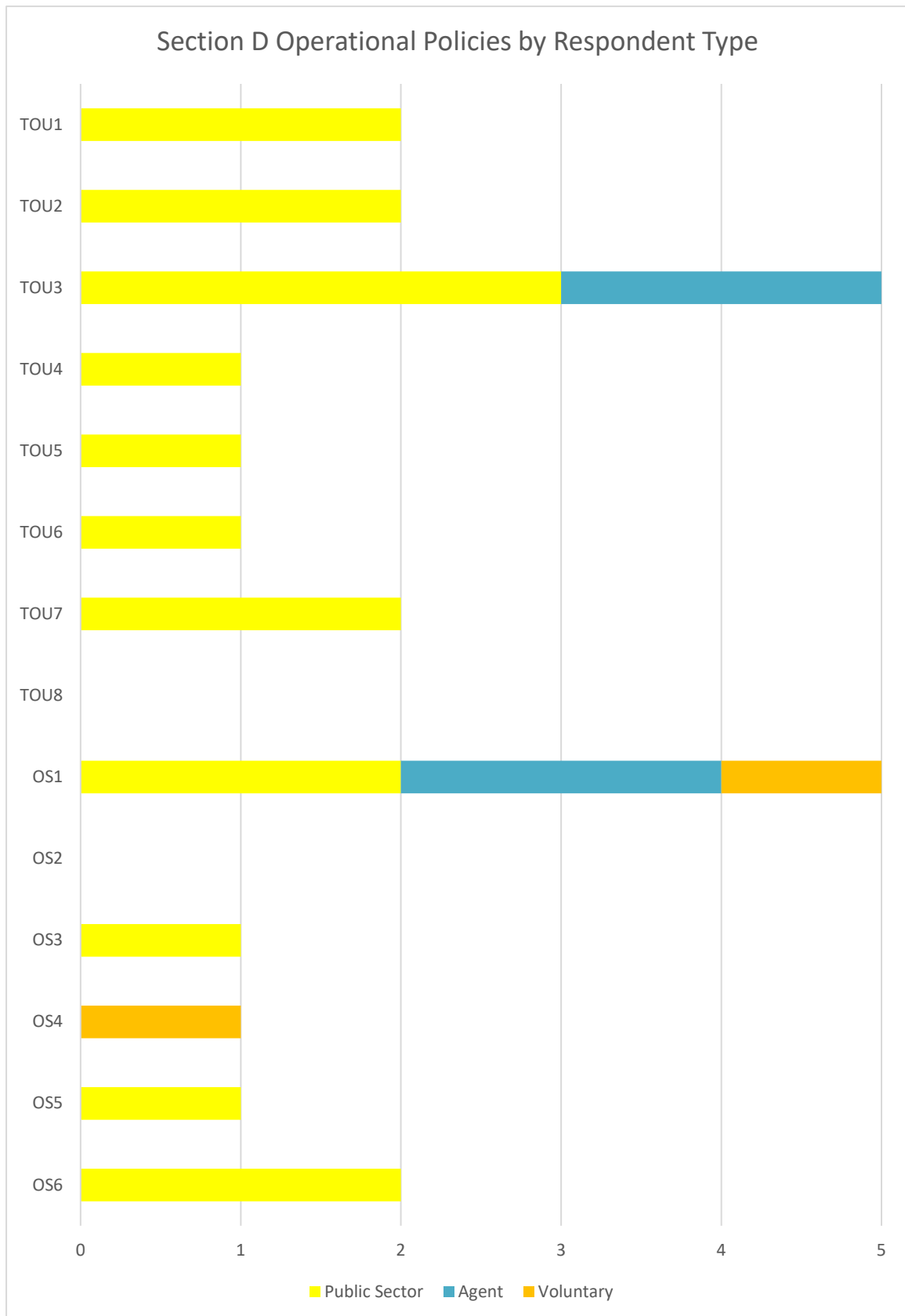
Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-081	Fleming Mounstephen Planning on behalf of the Henderson Group
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Armagh City, Banbridge and Craigavon Borough Council comment that there are no size restrictions for proposals in the countryside	The Council notes the comment. This is discussed further under the Council's consideration to DfI Representation, with suggested minor changes to the policy.
NIHE comment that they support this policy.	The Council welcomes the supportive comment.
Fleming Mounstephen on behalf of the Henderson Group comment that there is no explanation or justification provided as to why petrol filling stations must be located on a main trunk road (criteria a) or for the introduction of a needs test (criteria c).	The Council notes the comments. The Council considers that trunk roads are the most appropriate locations for Petrol Filling Stations and Roadside Service Facilities. The primary purpose of this policy is to cater for those who travel between the various part of, and through the district. As such these facilities are not appropriate on other roads within the district, where, subject to meeting the test of the other retail policies, local retailing can be accommodated.
The acceptability of the location of a petrol filling station should be assessed as part of the normal development management process. The requirement for a needs test for petrol filling stations discourages investment in new facilities whilst protecting existing facilities that may be poor quality or unsuitable in terms of meeting the customer's needs. TC6 should be amended in relation to the assessment of the impact of a retail unit associated with a petrol filling station. An assessment of need for a retail unit and impact on defined centres might be required, but no justification is given as to why the impact on	The LDP is the means of setting out how the Council seeks development within its district in a sustainable manner consistent with objectives set out in the SPPS. The Council is required to adopt a town centre first approach for retailing (SPPS paragraph 6.272) and retain and consolidate existing district and local centres for everyday shopping (SPPS paragraph 6.276). The Council will also set out appropriate policies that make it clear what uses will be permitted in other locations and the factors that will be taken into account for decision taking (SPPS paragraph 6.277). Uses under this policy are exempt from the sequential

<p>'existing facilities serving a similar function' outside of a defined centre is required.</p>	<p>approach to site selection set out in Policy TC1 because of their primary function which is the sale of fuel. It is necessary however to include an assessment of need and impact for the ancillary retail element of these facilities given that they are not in accordance with the town centre first approach and could compete directly with existing designated centres within the LDP.</p> <p>It is not therefore the intention of TC6 to protect existing services and discourage new investment, as suggested. A needs test is required in order to demonstrate that a proposal cannot be met by either an existing service facility on the same transport route and that it is not detrimental to other retail facilities within existing defined centres.</p>
<p>Dfl welcomes confirmation that these facilities will be considered in exceptional circumstances at a countryside location. However, it advised the policy should take account of the Dfl Guidance on the Preparation of LDP Policies for Transport as this makes specific reference to petrol filling stations and advises that operational planning policy 'should require that proposals for new petrol filling stations in the countryside, within 12 miles of existing services, will not be acceptable'.</p>	<p>The Council notes the comment and acknowledges attention being drawn to the Dfl guidance regarding the 12 mile distancing between petrol filling stations in the countryside. The Council also notes that existing policy IC15 contained within 'A Planning Strategy for Rural Northern Ireland' includes this specific criteria, however the SPPS is silent on the matter. The Council also notes that Dfl has referred to guidance, and not policy, within its own document. For these various reasons the Council does not propose to amend this policy further and considers the current policy criteria sufficiently robust to deal with proposals for petrol filling stations and roadside service facilities that are in addition to existing facilities in the district.</p>

**D: AN ATTRACTIVE PLACE**





## 7. TOURISM

### Policy TOU1 Tourism Development in Settlements

There were two representations received in respect of Policy TOU1 Tourism Development in Settlements.

#### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-109	Department for Infrastructure (DfI)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>HED suggests adding the following text to paragraph 4 of the J&amp;A:            ‘There is a requirement for high quality design and high quality service provision particularly in areas with other relevant designations such as <i>Scheduled Monuments, Listed Buildings, Historic Parks gardens and Demesnes</i>, Conservation areas, Areas of Townscape or Village Character.’</p>	<p>The Council notes the comments and although it is not necessary to include all scenarios, considers there is merit in expanding on the examples provided. The Council proposes for clarity, as a minor change, to amend paragraph 4 of the J&amp;A of Policy TOU1, page 62, as follows:            “There is a requirement for high quality design and high quality service provision in areas with other relevant designations such as Conservation Areas, Areas of Townscape or Village Character, <i>Scheduled Monuments, Listed Buildings and Historic Parks, Gardens and Demesnes</i>.”  <a href="#">(Ref: MC30 Minor Changes Schedule)</a></p>
<p>DfI comment that TOU1 would benefit from cross-referencing to TOU7.</p>	<p>The Council notes the comment however considers this unnecessary. The third paragraph of the Preamble on page 3 of Part 2 sets out the following statement in relation to consideration of relevant policies: <i>“For the purposes of ensuring sustainable development these operational policies must not be read in isolation from one another. Proposals must comply with all policy requirements contained in the operational policies, where relevant to the development.”</i>            Additionally under Part 4 Strategic Policies and Spatial Strategy (page 48, Part 1) the following paragraph states:  <i>“These strategic policies underpin the Spatial Strategy of the Plan and must be read together and in conjunction with other planning policy, including the RDS 2035, SPPS, and Operational Policy in Part 2 of this Plan Strategy.”</i></p>

## Policy TOU2 Proposals for Tourism Amenity in the Countryside

There were two representations received in respect of Policy TOU2 Proposals for Tourism Amenity in the Countryside.

### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
HED comments that the requirement for a Tourism Benefit Statement to demonstrate the value of the proposals in terms of its revenue and employment provision should be clarified with a statement that this information will be balanced against the other policy provisions in the LDP.	<p>The Council notes the comment however considers this unnecessary. The third paragraph of the Preamble on page 3 of Part 2 sets out the following statement in relation to consideration of relevant policies: <i>“For the purposes of ensuring sustainable development these operational policies must not be read in isolation from one another. Proposals must comply with all policy requirements contained in the operational policies, where relevant to the development.”</i></p> <p>Additionally under Part 4 Strategic Policies and Spatial Strategy (page 48, Part 1) the following paragraph states: <i>“These strategic policies underpin the Spatial Strategy of the Plan and must be read together and in conjunction with other planning policy, including the RDS 2035, SPPS, and Operational Policy in Part 2 of this Plan Strategy.”</i></p>
DfI comment that TOU2 would benefit from cross-referencing to TOU7.	Please refer to Council consideration above.
DfI comments that this policy refers to the requirement for both a Tourism Benefit Statement and Sustainable Benefit Statement. Detail is provided on the Tourism Benefit Statement but no further details provided on the Sustainable Benefit Statement. Furthermore within the SPG, it suggests that a Tourism Benefit Statement is similar, if not the same, as a Sustainable Benefit Statement – Council may wish to consider amalgamating these statements to avoid confusion.	<p>The Council agrees that there may be some possible confusion between the two statements, however these are explained in the Council’s SPG which accompanies the draft Plan Strategy. The Council proposes for clarity, as a minor change, to amend paragraph 3 of the J&amp;A of Policy TOU2, page 63, as follows: <i>“A tourism benefit statement <b>and sustainable benefit statement must demonstrate benefit to the region and locality taking account of the considerations set out in Supplementary Planning Guidance, Part D, Tourism, Page 33. A tourism benefit statement must demonstrate the value of the proposal...”</b></i></p>

	<a href="#">(Ref: MC31A Minor Changes Schedule)</a>
<p>Dfl notes this policy introduces additional wording to that of current operational planning policy, 'Proposals for extensions will <u>only</u> be permitted...'</p>	<p>The Council notes the comment and proposes for clarity, as a minor change, to remove the word 'only' from paragraph 4 of Policy TOU2, page 62, as follows:          "An extension of any existing tourist amenity will <del>only</del> be permitted where its scale and nature does not harm the rural character, amenity, landscape quality or environmental integrity of its locality."  <a href="#">(Ref: MC31B Minor Changes Schedule)</a></p>

## Policy TOU3 Proposals for Tourist Accommodation in the Countryside

There were five representations received in respect of TOU3 Tourism Accommodation in the Countryside.

### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-039	Inaltus Limited on behalf of O’Kane Property Ltd
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-109	Department for Infrastructure (DfI)
DPS-124	One2One Planning on behalf of Individual

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>HED suggests rewording paragraph 1 of the J&amp;A to augment the policy intent as follows:  ‘The retention and conversion of a vernacular building or a <i>suitable locally important building</i> for such uses, will be favourably considered <u>and assessed under HE13 and COU4 as appropriate. Where it is demonstrated the environmental benefit of full or partial replacement will outweigh the retention and conversion of the building, proposals should be accompanied by a report on the condition of the building and the economic feasibility of repairing and maintaining it for assessment.</u>’</p>	<p>The Council notes the comment and agrees this clarification would be beneficial. The Council proposes for clarity, as a minor change, to amend paragraph 1 of the J&amp;A of Policy TOU3, page 64, as follows:  “<del>The <i>retention and</i> conversion <i>and reuse</i> of a vernacular building <i>or a suitable locally important building</i> for such uses, will be favourably considered <i>and assessed under HE13, COU4 and COU14 as appropriate. Where it is demonstrated</i> the environmental benefit of the full or partial replacement will outweigh the retention and conversion of the building <i>The retention of vernacular buildings are therefore encouraged a report on the condition of the building and the economic feasibility of repairing and maintaining it will be assessed for such proposals.</i>”  (Ref: MC32A Minor Changes Schedule)</del></p> <p>*See also Council consideration for DfI representation below.</p>
<p>Inaltus on behalf of O’Kane Property Ltd is generally supportive of TOU3 however is of the opinion that it should be more flexible to allow for projects such as their clients i.e. mixed use regeneration.</p>	<p>The Council notes the comment and considers that while individual policies cannot provide for every type of proposal or scenario, the policies must not be read in isolation from one another.  The third paragraph of the Preamble on page 3 of Part 2 sets out the following statement in relation to consideration of relevant policies:  “<i>For the purposes of ensuring sustainable development these operational policies must not be read in isolation from one another.</i>”</p>

	<i>Proposals must comply with all policy requirements contained in the operational policies, where relevant to the development."</i>
NIEA suggested amending the wording of the last paragraph of the J&A on page 64 as follows: "Proposals which are deemed to be acceptable in principle will be required to include sufficient mitigation measures, including landscaping and design <u>and be in keeping with the surrounding landscape character, in order</u> to ameliorate any negative impacts and secure higher quality development."	The Council notes the comment, however it would point out that the additional J&A text suggested by NIEA already forms the basis of part e) of the policy; 'the overall size and scale of the new development ....will allow it to integrate into the surrounding landscape and.....'. Additionally the matter of design and landscaping fall for consideration within Policies TOU7, COU15 and COU16, which are applicable for all proposals in the countryside. For these reasons therefore, the Council does not intend to include the additional text as suggested.
Dfl comments that TOU3 would benefit from cross-referencing to TOU7.  Dfl considers the first paragraph of the J&A to be unclear, 'The <i>retention and conversion</i> of a vernacular building for such uses, will be favourably considered where the environmental benefit of full or partial replacement will outweigh the retention and conversion of the building'. The Council should consider there is no ambiguity of the intention of this statement.  Dfl state that it is unclear in paragraph 1 of the J&A, page 64 what assessment will be undertaken to consider 'condition of the building and the economic feasibility of repairing and maintaining' for retention of vernacular buildings and queried if an applicant would be required to submit specific documents.	Please see comment under TOU1 re cross-referencing.  The Council notes the comment and agrees this clarification would be beneficial. The Council proposes for clarity, as a minor change, to amend the first paragraph of the J&A of Policy TOU3, page 64, as follows: "The <del>retention and</del> conversion <i>and reuse</i> of a vernacular building <i>or suitable locally important building</i> for such uses..." (Ref: MC32A Minor Changes Schedule)  *See also Council consideration for HED representation above.  The Council notes the comment and agrees this clarification would be beneficial. The Council proposes for clarity, as a minor change, to insert the following paragraph under paragraph 3 of the J&A of Policy TOU3, page 64, (which repeats the J&A under Policy HE8) as follows: " <i>In the case of replacement of a vernacular building or a suitable locally important building in the countryside, a proposal must be accompanied by evidence reports to ascertain structural soundness. Such reports must be submitted by suitably experienced and accredited engineers, architects or building surveyors in the conservation field.</i> " (Ref: MC32B Minor Changes Schedule)
Dfl commented that the J&A advises that applications will be expected to be	The Council notes the comment and agrees this would be beneficial. The Council proposes

<p>accompanied by a variety of information. The policy states an expectation, not a requirement and do not provide further detail of what is considered 'sufficient' evidence to meet this expectation. Council may wish to consider the ambiguity created by this lack of clarity.</p>	<p>for clarity, as a minor change, to amend paragraph 3 of the J&amp;A of Policy TOU3, page 64, as follows:          "Applications made under this policy will be <del>required expected</del> to be accompanied with the following information:</p> <ul style="list-style-type: none"> <li>• <del>Sufficient</del> evidence to indicate how firm or realistic the particular proposal is and what sources of finance are available (including any grant aid) to sustain the project</li> <li>• <del>Detailed</del> evidence that there is no reasonable prospect of securing a suitable site within the limits of the particular settlement or other nearby settlement</li> <li>• justification for the particular site chosen and illustrative details of the proposed design and site layout." <p>(Ref: MC32C Minor Changes Schedule)</p> </li></ul>
<p>One2One Planning (on behalf of individual) commented that TOU3, specifically in relation to Tourism Accommodation on the Periphery of a Settlement requires clarification as it provides no context of how far a search should extend and is also vague in its reference to 'locality'.</p>	<p>The Council considers the use of the word 'periphery' in relation to settlement is sufficiently clear in its intention. Periphery by definition is 'outer limit or edge of an area'. The Council accepts that 'locality' is more ambiguous. The Council proposes, for clarity, as a minor change to amend Policy TOU3, page 63, under the sub-heading 'Tourist Accommodation on the Periphery of a Settlement' as follows:          "b) there are no suitable opportunities <del>in the locality</del> by means of;</p> <ul style="list-style-type: none"> <li>• the conversion and reuse of a suitable building(s) or</li> <li>• The replacement of a suitable building(s)"</li> </ul> <p>(Ref: MC32D Minor Changes Schedule)</p>

## Policy TOU4 Self-Catering Tourist Accommodation in the Countryside

There was one representation received in respect of Policy TOU4 Self-Catering Tourist Accommodation in the Countryside.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Dfi commented that TOU4 would benefit from cross-referencing to TOU7.	Please see previous 'Council Consideration' to Dfi comment under TOU1 re cross-referencing.

## Policy TOU5 Holiday Parks in the Countryside

There was one representation received in respect of Policy TOU5 Holiday Parks in the Countryside.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
DfI commented that TOU5 would benefit from cross-referencing to TOU7.	Please see previous 'Council Consideration' to DfI comment under TOU1 re cross-referencing.



## Policy TOU6 Proposals for Major Tourism Development in the Countryside

There was one representation received in respect of Policy TOU6 Major Tourism in the Countryside.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
DfI commented that TOU6 would benefit from cross-referencing to TOU7.	Please see previous 'Council Consideration' to DfI comment under TOU1 re cross-referencing.

## Policy TOU7 General Criteria for Tourism Development

There were two representations received in respect of Policy TOU7 General Criteria for Tourism Development.

### Respondents

Reference Number	Respondent
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIEA were generally supportive of TOU7 but is of the opinion that greater emphasis needs placed on development that does not adversely affect features of the natural environment and should be cross referenced with the Natural Heritage Policies.	Policy TOU7 requires that the proposal does not adversely affect features of the natural environment and is similar to the wording used in PPS 16 Tourism. TOU7 must not be read in isolation from other policies within the LDP. Please refer to comment at TOU1 re cross-referencing.
DfI commented that TOU1 to TOU6 would benefit from cross-referencing to TOU7.  The terminology used within criteria a)... “will <u>indicate</u> walking and cycling provision” may be open to interpretation. The Council may wish to consider this wording to provide greater clarity, particularly in relation to the intention of the policy? For example, does the policy also seek to support or promote walking and cycling provision?	Please see previous ‘Council Consideration’ to DfI comment under TOU1 re cross-referencing.  The Council notes the comment and considers the J&A, in particular the opening sentence implies the intent to support sustainable development which includes provision of walking and cycling in the design. It is not a promotion of these forms of transport over other means of transport rather they are complementary and should form part of the overall design consideration.

**Policy TOU8 Safeguarding of Tourism Assets**

There were no representations received in respect of Policy TOU8 Safeguarding of Tourism Assets.

## 8. OPEN SPACE, SPORT AND OUTDOOR RECREATION

### Policy OS1 Protection of Open Space

There were five representations received in respect of Policy OS1 Protection of Open Space.

#### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-083	Agent
DPS-085	Agent
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (DfI)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIHE were strongly supportive of this policy in particular the inclusion of the provision of affordable housing cited as an example of a substantial community benefit. NIHE would welcome the inclusion of NIHE as a provider of affordable housing in addition to the reference to Housing Associations.	The Council welcomes the supportive comments and acknowledges NIHE's role in the provision of affordable housing. The Council proposes for clarity, as a minor change, to amend the third sentence of paragraph 3 of the J&A, page 68, as follows: "Any exception to this policy approach will only be appropriate where it is demonstrated that redevelopment would bring substantial community benefit that outweighs the loss of open space, for example the provision of affordable housing by a Housing Association <i>or the Northern Ireland Housing Executive</i> in accordance with Policy HOU10; or where it is demonstrated that the loss of open space will have no significant detrimental impact." <a href="#">(Ref: MC33 Minor Changes Schedule)</a>
Both agent's comment that the wording of OS1 prevents the development of open space which impacts the housing figures indicated in the Urban Capacity Study.	The Council notes the comment however disagrees that the wording of Policy OS1 impacts on the housing figures indicated in the Urban Capacity Study, as the policy is, rightly, by exception only. It is considered that the monitoring of this Policy at Local Policies Plan stage will identify if any amendment is required.
RSPB NI comments that OS1 fails to take account of wording in Policy OS1 of PPS8 that requires alternative use of open space to 'be assessed with regard to their effect on the amenity, character and biodiversity of the area <u>and the wider locality and taking into account the needs of future generations.</u> '	The Council notes the comment and considers that Policy OS1 of the dPS, whilst not an exact duplication of Policy OS1 of PPS8, is in accordance with PPS8 and the SPPS (paragraph 6.205) and therefore proposes no change to this policy. Additionally assessment of any future development proposals on areas of open

	<p>space must not be considered by Policy OS1 in isolation, but within the context of all other operational policies. Matters of amenity, character and biodiversity within the area will therefore be considered against other relevant operational policies.</p>
<p>RSPB NI comments that OS1(b) fails to copy across the requirement within PPS8 OS1(ii) which permits the exercising of such an exception 'only once'. It also suggests adding the following text to the J&amp;A:- 'the above exception will be applied only once to guard against the piecemeal erosion of playing fields and sports pitches by a succession of small development, possibly over a long period of time'.</p>	<p>The Council acknowledges in replacing the policies of PPS8 reference to 'only once' has been removed. This is not in conflict with the SPPS which advises at paragraph 6.205, page 87 that a loss of open space should demonstrate 'no significant detrimental impact'. The Council considers Policy OS1(b) is clear in its intent, that it allows, by exception, redevelopment of '<i>a small part of existing open space to a maximum of 10% of the overall area</i>'. The Council therefore proposes no change to this policy.</p>
<p>Dfl comments on the reference to 'substantial community benefits' including Affordable Housing and the requirement to renegotiate the existing protocol between the Department and the NIHE. Dfl suggests OS1 would benefit from including this detail in the policy instead of reference to HOU10 in the footnote.</p>	<p>The Council notes the comment, however the provision of affordable housing is just one example of a 'substantial community benefit'. To include reference to this within the policy, rather than a footnote, could give the impression that this is the only exception to the principle of protecting existing open space. The Council therefore does not intend to amend the wording of this policy or its footnote.</p>

**Policy OS2 Intensive Sports Facilities**

There were no representations received in respect of Policy OS2 Intensive Sports Facilities.

### **Policy OS3 Noise-Generating Sports and Outdoor Recreational Activities**

There was one representation received in respect of Policy OS3 Noise-Generating Sports and Outdoor Recreational Activities.

#### **Respondents**

<b>Reference Number</b>	<b>Respondent</b>
DPS-109	Department for Infrastructure (DfI)

#### **Council Consideration of Issues Raised**

<b>Main Issue(s) Raised</b>	<b>Council Consideration</b>
DfI comments that OS3 have strengthened the existing approach and provides greater clarity in line with paragraph 6.208 of the SPPS.	The Council welcomes the supportive comment.

## Policy OS4 Facilities ancillary to Water Sports

There was one representation received in respect of Policy OS4 Facilities ancillary to Water Sports.

### Respondents

Reference Number	Respondent
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
RSPB NI comment that adding 'associated with the body of water' at OS4 (g) the provisions of the policy have been effectively weakened. It states that this will not permit consideration of management plans which are associated with the land surrounding the waterbody e.g. management plans for habitats adjacent to the waterbody.	The Council notes the comment, however would point out that " <i>all of the criteria</i> " specified within the policy must be met. Policy OS4 (g), specifically directs consideration of management plans associated with the body of water, it does not exclude consideration of other natural heritage designations which are covered under OS4 (b). The J&A, paragraphs 1 and 4 further clarify this matter.



## Policy OS5 Floodlighting of Sports and Outdoor Recreational Facilities

There was one representation received in respect of Policy OS5 Floodlighting of Sports and Outdoor Recreational Facilities.

### Respondents

Reference Number	Respondent
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIEA views this as positive in that no adverse impact is to occur on features of the natural environment and nature conservation. Floodlighting can have a significant impact on bats and wider biodiversity.	The Council welcomes the supportive comment.

## Policy OS6 Outdoor Recreation in the Countryside

There were two representations received in respect of Policy OS6 Outdoor Recreation in the Countryside.

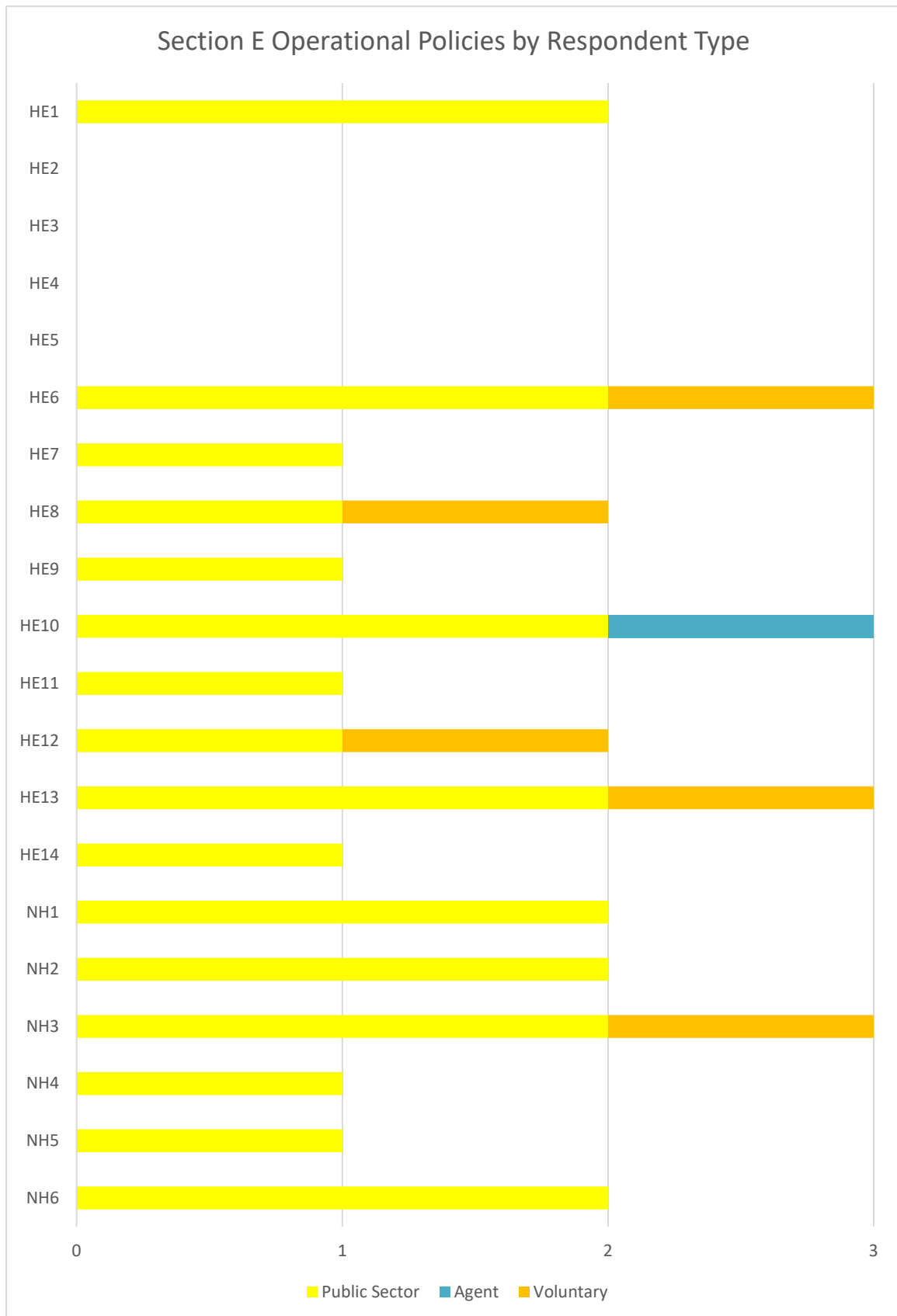
### Respondents

Reference Number	Respondent
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIEA welcomes that development will only be permitted where there is no adverse impact to the natural environment/nature conservation.	The Council welcomes this supportive comment.
DfI comments that Council policy omits reference to the best and most versatile agricultural land; that the road network can safely handle the extra vehicular traffic the proposal will generate; and satisfactory arrangements are provided for access, parking, drainage and waste disposal. Furthermore there is no reference to accessibility by means of transport other than the private car. The Council may wish to consider these aspects in line with paragraph 6.208 of the SPPS.	The Council notes the comments, however given that the SPPS is silent in terms of the types of uses acceptable in the countryside (paragraph 6.208 actually refers to noise-generating sports – see Policy OS3) it is considered that the policy fully meets the requirements and propose no change. The loss of agricultural land referred to in original policy OS3 of PPS8, is not relevant in that there is no established standard of what constitutes the most valuable agricultural land. Policies in the Infrastructure section of Part 2 in relation to access and transport, drainage and waste disposal are dealt with under Policies TRA1, TRA2, TRA3, TRA6, TRA7, TRA8; Utilities UT1; and Waste Management/disposal Policies WM1-WM5.

**E: A GREEN PLACE**



## 9. HISTORIC ENVIRONMENT AND ARCHAEOLOGY

### Operational Policy HE1 The Preservation of Archaeological Remains of Regional Importance and their Settings.

There were two representations received in respect of Operational Policy HE1 The Preservation of Archaeological Remains of Regional Importance and their Settings.

#### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>HED identify an issue in relation to the last sentence of paragraph 3 of the J&amp;A on page 74, which reads <i>'In the majority of cases it should prove possible for differences to be resolved through voluntary discussion and for a satisfactory compromise to be reached.'</i></p> <p>HED advise this sentence aligns with a section in PPS6, page 18, which relates to a completely separate issue, specific to discussions taking place in relation to previously unknown archaeological remains which have been discovered during the course of an already approved development. Its use in the context of decision making in relation to scheduled monuments generally in the plan strategy as articulated above, creates an inference that scheduled monument consent is likely to be approved following discussion with HED. HED advises that this approach does not align with SPPS 6.8 or existing PPS6 policy or Development Plan Practice Note 5, paragraph 9.13 and 9.14. The Historic Monuments and Archaeological Objects (NI) Order 1995 is focused on the curation and protection of archaeological remains and is separate and distinct from planning legislation. HED advise that there is no presumption in favour of the granting of scheduled monument consent and that this sentence must be removed in order to achieve soundness. The remainder of the paragraph is sound.</p>	<p>The Council notes the comment and, having reviewed the references in paragraph 6.8 of the SPPS, PPS6, page 18 and the Development Plan Practice Note 5 paragraphs 9.13 and 9.14, agrees there is no presumption in favour of granting of scheduled monument consent. The Council proposes for clarity, as a minor change, to remove the last sentence in the third paragraph of the J&amp;A of Policy HE1, page 74, as follows:</p> <p><del><i>"In the majority of cases it should prove possible for differences to be resolved through voluntary discussion and for a satisfactory compromise to be reached."</i></del></p> <p>(Ref: MC34A Minor Changes Schedule)</p>

NIEA suggest in the J&A the following bullet point be added:  
'the protection of the setting of the site or monument.'

The Council notes the comment, which is reflective of the policy title of HE1. The Council proposes for clarity, as a minor change, to amend the first bullet point of the J&A of Policy HE1, page 74, as follows:  
*"The critical views of, and from the site or monument including the protection of its setting"*  
(Ref: MC34B Minor Changes Schedule)

**Operational Policy HE2 The Preservation of Archaeological Remains of Local Importance and their Settings**

There were no representations received in respect of Operational Policy HE2 The Preservation of Archaeological Remains of Local Importance and their Settings.

**Operational Policy HE3 Archaeological Assessment and Evaluation**

There were no representations received in respect of Operational Policy HE3 Archaeological Assessment and Evaluation.

**Operational Policy HE4 Archaeological Mitigation**

There were no comments raised in respect of Operational Policy HE4 Archaeological Mitigation.

**Operational Policy HE5 Historic Parks, Gardens and Demesnes of Special Historic Interest**

There were no representations received in respect of Operational Policy HE5 Historic Parks, Gardens and Demesnes of Special Historic Interest.

## Operational Policy HE6 Change of Use and/or Extensions or Alterations to a Listed Building

There were three representations received in respect of Operational Policy HE6 Change of Use and/or Extensions or Alterations to a Listed Building.

### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>HED advise that in order to make the policy 'more sound' and align with requirements of the SPPS, paragraph 6.13, the inclusion of the word 'normally' should be included as follows: 'The Council will <i>normally</i> permit the change of use and/or extension or alteration of a listed building where this will secure its upkeep and survival.' This enables a balanced consideration of the proposal in terms of the appropriateness of the use/extension or alteration against the remaining policy requirements i.e. respecting the essential character, special architectural or historic interest and conserving features of special interest.</p>	<p>The Council notes the suggested inclusion of the word 'normally' into the policy. The word normally is included in the current Policy BH6 of PPS6. However the wording in paragraph 6.13 of the SPPS is 'may'. The Council acknowledges there is a lack of consistency across the various documents and that in order to provide clarity the policy wording should replicate that of the SPPS, i.e. the inclusion of the word 'may' instead of 'will'.</p> <p>The Council proposes for clarity, as a focussed change, to amend the first sentence of Policy HE6, page 77, as follows:            "The Council <del>will</del> <i>may</i> permit the change of use..."            (Ref: FC9 Focussed Changes Schedule)</p>
<p>HED also recommends the inclusion of the word '<i>special</i> architectural or historic interest of the building' into the second sentence of the policy as this aligns with the legislative test of a 'listed building' under Section 80 of the Planning Act NI 2011.</p>	<p>The Council notes the comment and acknowledges the word 'special' appears not only in the Planning Act but also in the SPPS at paragraph 6.12. The Council proposes for clarity, as a minor change, to amend the second sentence of Policy HE6, page 77, as follows:            "Such development should respect the essential character, <i>special</i> architectural or historic interest of the building and its setting, and that features of special interest remain intact and unimpaired."            (Ref: MC35A Minor Changes Schedule)</p>
<p>To provide greater clarity, HED suggests omitting 'building/place' from the second paragraph of the policy as these terms are included in the definition of a 'heritage asset'.</p>	<p>The Council notes the suggested omission of the words, however they are as written in paragraph 6.13 of the SPPS. For this reason the Council considers that an amendment to the policy is not needed.</p>

<p>HED recommends including a definition for a 'Heritage Asset' as follows: <u>'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.'</u></p> <p>HED note that Policy HE9 includes criteria that new development impacting on the setting of a listed building should be appropriate in terms of detailed design, material and techniques. Policy HE7 J&amp;A also refers to the use of 'quality materials'. To ensure alignment between the suite of HE policies, HED recommends the inclusion of the following text at the end of J&amp;A paragraph 1: <u>'The works and architectural details should use quality materials and techniques (traditional and/or sympathetic) in keeping with the listed building.'</u></p> <p>In paragraph 5 of the J&amp;A text, HED recommends the omission of the last 2 lines, <i>'...because it is vitally important that new work does not weaken the structural integrity of the building'</i> as the significance of the building is not restricted to its structural system; it is a comprehensive assessment of its special interest.</p>	<p>HED have supplied a definition of Heritage Asset. The Council proposes for clarity, as a minor change, to include the definition of Heritage Asset within the Glossary of Part 2 as follows:  <i>"Heritage Asset: "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest."</i>  (Ref: MC59 Minor Changes Schedule)</p> <p>The Council accepts the point made in terms of consistency between the suite of HE policies. The Council proposes for clarity, as a minor change, to amend paragraph 1 of the J&amp;A of HE6, page 77, as follows:  <i>"The works and architectural details should use quality materials and techniques (traditional and/or sympathetic) in keeping with the listed building."</i>  (Ref: MC35B Minor Changes Schedule)</p> <p>The Council accepts the suggested amendment from HED and agrees that the significance of the building goes beyond its structural system. The Council proposes for clarity, as a minor change, to amend paragraph 5 of the J&amp;A, page 77, as follows:  <i>"All proposals for alteration should also be based on a proper understanding of the significance of the listed building. <del>because it is vitally important that new work does not weaken the structural integrity of the building.</del>"</i>  (Ref: MC35C Minor Changes Schedule)</p>
<p>RSPB NI recommends that the policy be amended to include the following: <i>'Any extensions, alterations or adaptations should not result in a net loss of biodiversity, and where possible enhance thereby contributing to net gain.'</i></p>	<p>The Council notes the comment. This operational policy is for the change of use and/or Extensions or Alterations to a Listed Building, it does not and should not include policy references to impacts on natural heritage (biodiversity). Developers are required to assess the impacts through biodiversity checklists and are directed by operational policies NH2 and NH5 of the dPS and/or non-planning legislation for the protection of natural habitats (e.g. the Wildlife Order).</p>
<p>Dfl note paragraph 6.13 of the SPPS relates to the change of use and/or extensions or alterations to a listed building. The SPPS uses</p>	<p>This issue was previously noted in response to comments received from HED:</p>



<p>the phrase '<u>may</u> be permitted' in contrast to Council policy where they have stated that the 'Council <u>will</u> permit'. The Council may wish to use policy wording in line with the SPPS.</p>	<p>The Council proposes for clarity, as a minor change, to amend the first sentence of Policy HE6, page 77, as follows: "The Council <del>will</del> <i>may</i> permit the change or use and/or extension ..." <a href="#">(Ref: FC9 Minor Changes Schedule)</a></p>
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## Operational Policy HE7 Control of Advertisements on a Listed Building

There was one representation received in respect of Operational Policy HE7 Control of Advertisements on a Listed Building.

### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>HED suggest that to give more weight to the consideration of the remainder of the policy and align with policy text in paragraph 6.14 of the SPPS, the addition of the word 'only' as follows:</p> <p><i>'The Council will grant the consents necessary for advertisements or signs on a listed building <u>only</u> where these are carefully designed and located to respect the architectural form and detailing of the building, amenity of the locality and which are not detrimental to public safety.'</i></p>	<p>The Council acknowledges the rationale for the proposed inclusion of text within HE7 to align with the SPPS.</p> <p>The Council proposes for clarity, as a minor change, to amend the first sentence of Policy HE7, page 78, to include the word 'only', to read consistently with the wording of paragraph 6.14 of the SPPS as follows:</p> <p>"The Council will grant the consents necessary for advertisements or signs on a listed building <i>only</i> where these are carefully designed and located to respect the architectural form and detailing of the building, amenity of the locality and which are not detrimental to public safety." <a href="#">(Ref: MC36 of Minor Changes Schedule)</a></p>

## Operational Policy HE8 Demolition or Partial Demolition of a Listed Building

There were two representations received in respect of Operational Policy HE8 Demolition or Partial Demolition of a Listed Building.

### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB (NI))

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>HED comment on the following: To provide ease of reference, HED suggests the assessment criteria, as set out in the third paragraph of the J&amp;A text, is annotated with letters i.e. a, b, &amp; c in lieu of bullet points.</p> <p>HED also suggests amendments to the second bullet point as follows, to give greater explanation in relation to retaining/ finding new uses:</p> <ul style="list-style-type: none"> <li>• <i>the adequacy of efforts made to retain the building in use or to find compatible new or alternative uses</i></li> </ul> <p>The last line of the J&amp;A text should be augmented as follows, to align with the policy text requirement to record the listed building prior to its demolition, where exceptionally LBC is granted: <u>Where exceptionally, consent is granted for the demolition of a listed building, conditions should normally include:</u></p> <ul style="list-style-type: none"> <li>• <i>A Section 76 Planning Agreement to ensure the site is subsequently redeveloped for the purpose granted and</i></li> <li>• <i>Appropriate recording of the building prior to its demolition, typically consisting of a drawn, photographic and written record.</i></li> </ul>	<p>The Council notes the comment. The format throughout the two dPS documents as published lists criteria within policy under letters (a, b, c etc) and bullet points within the J&amp;A. The Council does therefore not consider the need to change bullet points to letters for the reason given.</p> <p>The Council notes the comment and accepts that whilst the thrust of the policy seeks to retain a listed building in its original or reasonably modified form, there may be a case for compatible new or alternative use. This will be discussed with HED as the statutory consultee on a case by case basis and therefore no change is considered necessary.</p> <p>The Council notes the comment. A Section 76 Planning Agreement cannot replace a condition. Such an agreement is implemented when conditions cannot be used to secure a proposed development. The Council acknowledges that the use of conditions for the redevelopment of the site and recording of the listed building prior to demolition (which will conform with paragraph 6.15 of the SPPS) is beneficial. The Council proposes for clarity, as a minor change, to amend the J&amp;A of Policy HE8 as follows: <i>“Where consent to demolish a listed building is granted, this will normally be conditional on prior agreement for the redevelopment of the site and appropriate arrangements for recording the building prior to its demolition.”</i> (Ref: MC37 Minor Changes Schedule)</p>

	This sentence should be inserted before the last paragraph of the J&A on page 79.
RSPB NI recommends that the policy be amended to include the following: <i>'Any extensions, alterations or adaptations should not result in a net loss of biodiversity, and where possible enhance thereby contributing to net gain.'</i>	The Council notes the comment. This operational policy is for the demolition or partial demolition of a listed building, by exception only, in which circumstances a full planning application would be submitted. Applicants/developers are therefore required to assess any potential impacts through biodiversity checklists and are directed by operational policies NH2 and NH5 of the dPS and/or non-planning legislation for the protection of natural habitats (e.g. the Wildlife Order).

## Operational Policy HE9 Development affecting the Setting of a Listed Building

There was one representation received in respect of Operational Policy HE9 Development affecting the Setting of a Listed Building.

### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>HED notes a typo error in the first word of the policy 'Proposal' should read 'Proposals'.</p> <p>To ensure alignment between the suite of HE policies in respect of materials/ details and techniques, HED recommends the following revision to reference b):  <u>'The works and architectural details should use quality materials and techniques (traditional and/or sympathetic) in keeping with the listed building.'</u></p> <p>Consultation requirements on development proposals are set out under Schedule 3, 1(b) of the Planning (General Development Procedure) Order (NI) 2015. Councils must consult DfC (HED) <i>'where a development proposal is likely to affect the... setting of a listed building...'</i> HED therefore suggests the following amendment to the first two lines of the J&amp;A text:  <u>'The Council will consult DfC where a development proposal is likely to affect the setting of a listed building. Development which by its character or location may have an adverse effect on the setting of a listed building will require very careful consideration, even if the development would only replace a building which is neither itself listed nor immediately adjacent to a listed building.'</u></p>	<p>The Council notes the typo and will amend the first word of the policy of HE9 to <i>'Proposals'</i> (Ref: see Typo List )</p> <p>The Council accepts the point made in terms of consistency between the suite of HE policies. The Council proposes for clarity, as a minor change, to amend criteria (b) of Policy HE9, page 79, as follows:  <i>"(b) the works <del>proposed make use of traditional or sympathetic building materials and techniques and architectural details should use quality materials and techniques (traditional and/or sympathetic) which respect those found</del> in keeping with the listed building."</i>            (Ref: MC38 Minor Changes Schedule)</p> <p>The Council notes the request for amendment to the J&amp;A (Policy HE9, dPS Part 2, page 79). The suggested amendment will merely emphasize the policy wording of HE9 which is itself entitled 'Development affecting the Setting of a Listed Building.'            The Council does therefore not consider the need to change this sentence.</p>
<p>To align the suite of HE policies with the requirement under SP02 for <i>'quality design'</i></p>	<p>The Council notes the request to amend the last line of the 3<sup>rd</sup> paragraph of the J&amp;A to be</p>

<p>and HE10 for ‘...a very high standard of design..’, HED requires the following amendments to the second line of the third paragraph of the J&amp;A as follows:  <u>‘Such buildings must be of a very high standard of design, which respects their setting in terms of scale, height, massing and alignment, with the use of quality materials.’</u></p>	<p>reflective of the wording within Strategic Policy SP02 Improving Health and Well-being and Operational Policy HE10 New Development in a Conservation Area or Area of Townscape Character/Area of Village Character. The suggested amendment will merely emphasize the wording of Policy HE9, particularly criteria a). The requirement of Criteria a), that the detailed design respects the listed building, is sufficient and does not need emphasized further in the J&amp;A. The Council does not propose to amend the wording of the J&amp;A as suggested.</p>
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## Operational Policy HE10 New Development in a Conservation Area or Area of Townscape Character/Area of Village Character

There were three representations received in respect of Operational Policy HE10 New Development in a Conservation Area or Area of Townscape Character/Area of Village Character.

### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Division (NIEA)
DPS-083	Agent

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>HED comment that the policy states the means by which a CA and ATC is designated. This text does not provide policy direction and therefore may be best placed within the J&amp;A text.</p> <p>Should the Council wish to retain the policy text, HED requires the following changes to the first paragraph to make the policy 'more sound' to meet the Consistency Test (C3) as per Section 104 of the Planning Act (NI) 2011 and SPPS p.43. <i>The Council may designate Conservation Areas</i> based on their historic built form or layout as 'areas of special architectural or historic interest within its district the character or appearance of which it is desirable to preserve or enhance'.</p>	<p>The Council notes the comment and acknowledges that there is no policy direction with the text.</p> <p>The Council proposes for clarity as a minor change, to remove the following paragraphs from Policy HE10 and place in the J&amp;A, page 80, (as first and second paragraphs) as follows: <i>Remove the first paragraph that deals with CA designation and place as first paragraph of J&amp;A; and</i> <i>Remove the third paragraph that deals with ATC and AVC designation and place as second paragraph of J&amp;A.</i> (Ref: MC39A Minor Changes Schedule)</p> <p>The Council considers that following the implementation of the minor change referred to above, that this amendment is not necessary, as it is already provided for within Section 104 of the Planning Act (NI) 2011 Act.</p>
<p>HED recommends replacing the word '<i>respects</i>' with '<i>preserves</i>' in the third line of the first paragraph of the J&amp;A text, to adhere with legislative and strategic policy text.</p>	<p>The Council notes the comment but points out the word 'preserves' appears where necessary in the policy text of HE10 and therefore it proposes for clarity, as a minor change, to amend the first paragraph of the J&amp;A of Policy HE10, page 80, as follows:</p>

	<p>"Designation as a Conservation Area or ATC/AVC puts an onus on prospective developers to produce a very high standard of design <i>in accordance with the following criteria.</i>" <del><i>which respects or enhances the particular qualities of the area in question.</i></del>" (Ref: MC39B Minor Changes Schedule)</p>
<p>NIEA comments on the following: The J&amp;A, 1st paragraph should be amended to "Designation as a Conservation Area or ATC/AVC puts an onus on prospective developers to produce a very high standard of design, which respects or enhances the particular qualities <u>and landscape/townscape character</u> of the area in question."</p> <p>J&amp;A, page 81: Trees: The representation would recommend deletion of the 2nd word 'often' i.e. First line should read "Trees make an important contribution... etc."</p> <p>The 3rd paragraph of the J&amp;A, page 81, under the sub heading Trees, should be amended. It states "All trees within a Conservation Area are automatically protected as though a Tree Preservation Order was in place under Section 127 of the Planning Act (Northern Ireland) 2011." Our understanding is that this isn't the case. Trees are only protected for 6 weeks from an application being made to carry out works or to fell and if no decision is given by then, the applicant can proceed. So there is a level of protection but only if the local authority acts within the time limitation.</p> <p>Under the sub heading 'Information to accompany all Planning Applications', J&amp;A on page 81: NIEA recommend the addition of the following bullet point:- Outline planning permission will not be given unless the Council is assured that sufficient information is made available in order to</p>	<p>The Council proposes for clarity, as a minor change, to amend the first paragraph of the J&amp;A of Policy HE10, page 80, as follows: "Designation as a Conservation Area or ATC/AVC puts an onus on prospective developers to produce a very high standard of design <i>in accordance with the following criteria.</i>" <del><i>which respects or enhances the particular qualities of the area in question</i></del> (Ref: MC39B Minor Changes Schedule)</p> <p>Additionally, the Council notes reference to landscape but does not consider the inclusion of the word 'landscape' adds to the policy test and is content with the current policy wording.</p> <p>The Council also notes the comment to remove the word 'often' from first sentence under the section 'Trees', J&amp;A, page 81. The Council is content with the current wording and considers this to be more accurate.</p> <p>The Council notes the comment but proposes to leave the wording as shown as the suggested alternative wording is more likely to cause confusion. What is stated is technically correct and the paragraph refers the reader to Section 127 of the Planning Act 2011.</p> <p>The Council notes the suggestion however refers to the second paragraph of the policy: <i>"The Council will require new development within a Conservation Area to:</i></p> <ul style="list-style-type: none"> <li><i>• enhance the character and appearance of the area where an opportunity to do so exists, or to preserve its character or appearance where an opportunity to enhance does not arise."</i></li> </ul>



demonstrate that there will be no negative impact on the Conservation Area.	This part of the policy is robust and provides the same thrust as what NIEA is proposing.
An Agent comments that the policy places further restriction on the potential of windfall sites which did not exist historically.	The Council notes the comment which is devoid of any further explanation why this policy is restrictive to development in a CA/ATC/AVC.

**Operational Policy HE11 The Control of Advertisements in a Conservation Area or Area of Townscape Character/Area of Village Character**

There was one representation received in respect of Operational Policy HE11 The Control of Advertisements in a Conservation Area or Area of Townscape Character/Area of Village Character.

**Respondents**

Reference Number	Respondent
DPS-030	Department for Communities - Historic Environment Division (HED)

**Council Consideration of Issues Raised**

Main Issue(s) Raised	Council Consideration
<p>HED suggest that to ensure the policy reads coherently, that the last line of the policy text is reworded to clarify the requirement for advertisement consent applications in a Conservation Area to also satisfy operational Policy AD1.</p> <p>‘In Areas of Townscape Character (ATC) or Areas of Village Character (AVC) consent for the display of an advertisement should only be granted where the overall character and appearance of the area will be maintained. <u>All proposals should also</u> meet the requirements of operational Policy AD1 the Control of Outdoor Advertisements.’</p>	<p>The Council notes the comment and agrees that Policy HE11 as currently written, appears that Policy AD1 only applies to advertisements in AVCs/ATCs, not CAs. The Council proposes for clarity, as a minor change, to amend Policy HE11 (and include as a separate paragraph), page 82, as follows:  <del>“... and the</del>All proposals <i>must also</i> meet the requirements of operational Policy AD1 on the Control of Outdoor Advertisements.”  <a href="#">(Ref: MC40 Minor Changes Schedule)</a></p> <p>As a consequence of the above the Council notes that the J&amp;A to Policy AD1 also needs to be amended to cross reference with Policy HE11 in relation to CAs, ATCs and AVCs. The Council proposes for clarity, as a minor change, to amend the heading of the final paragraph of the J&amp;A, page 118, as follows:  “Listed Buildings, Conservation Areas and Areas of Townscape/<i>Village</i> Character”  The first sentence of the paragraph should then read:  “Policies and guidance for the control of advertisements affecting Listed Buildings, Conservation Areas <i>and Areas of Townscape/ Village Character</i> are set out in Operational Policies HE7 and HE11.”  <a href="#">(Ref: MC58B Minor Changes Schedule)</a></p>

## Operational Policy HE12 Demolition or Partial Demolition in a Conservation Area or Area of Townscape Character/Area of Village Character

There were two representations received in respect of Operational Policy HE12 Demolition or Partial Demolition in a Conservation Area or Area of Townscape Character/Area of Village Character.

### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>HED suggests the first line of the second paragraph of the J&amp;A text is reworded as follows to emphasise that the test for demolition in a Conservation Area, ATC or AVC is to prove the building makes <i>no material contribution</i> to either the character or appearance of the area (CA) or distinctive character of the area (ATC or AVC). The current text refers to <i>'the need for demolition'</i> rather than an assessment of its 'material contribution'.</p> <p>HED suggests the following alternative wording: <i>'The onus will be on the applicant to demonstrate and justify why the building makes no material contribution and satisfies the test for demolition.'</i></p>	<p>The Council notes the comments regarding the suggested change to the wording of the J&amp;A. This suggested change partly replicates the wording contained within the policy text of HE12, which has been carried forward from PPS6 and appears in paragraph 6.19, page 40 of the SPPS. There is no reference in PPS6 or the SPPS to 'test for demolition'. Paragraph 3 of the J&amp;A to HE12 does refer to criteria that are set out in HE8 in relation to the demolition or partial demolition of a listed building.</p> <p>The Council proposes for clarity, as a minor change, to amend paragraph 2 of the J&amp;A of Policy HE12, page 82, as follows:  <i>"The onus will be on the applicant to demonstrate and justify why the building makes no material contribution and the need for demolition"</i>.</p> <p><a href="#">(Ref: MC41 Minor Changes Schedule)</a></p>
<p>RSPB NI recommend that the policy be amended to include the following:  <u>'Any extensions, alterations or adaptations should not result in a net loss of biodiversity, and where possible enhance thereby contributing to net gain.'</u></p>	<p>The Council notes the comment. This operational policy is for the demolition or partial demolition in a CA/ATC/ATC, in which circumstances a full planning application would be submitted. Applicants/developers are therefore required to assess any potential impacts through biodiversity checklists and are directed by operational policies NH2 and NH5 of the DPS and/or non-planning legislation for the protection of natural habitats (e.g. the Wildlife Order).</p>

## Operational Policy HE13 The Conversion and Reuse of Non-Listed Buildings

There were two representation received in respect of Operational Policy HE13 The Conversion and Reuse of Non-Listed Buildings.

### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>HED comment that the J&amp;A text provides guidance on what is meant by ‘vernacular buildings’. Locally Important Buildings, which are those which have a degree of architectural or historic significance.</p> <p>To ensure consistency and make the policy ‘more sound’, HED recommends that footnote 30 provides the definition of a ‘locally important building’ as per SPPS 6.24, footnote 11 and reference to the DfC publication ‘<i>Historic Buildings of Local Importance – A Guide to their identification and protection</i>’ May 2017, is included in the J&amp;A text.</p>	<p>The Council considers that the definition of a locally important building should also be included within the J&amp;A to Policy HE13 (dPS, Part 2, page 83). This replicates the approach the Council has taken with policies COU4 and COU14. The Council proposes for clarity, as a minor change, to amend paragraph 1 of the J&amp;A of HE13, page 83, as follows:</p> <p>“For the purposes of this policy ‘Vernacular Buildings’ <i>are those that</i> reflect the local ‘folk tradition’ and are typical of a common type of building in a particular locality, generally pre 1925. For more detail refer to ‘A Sense of Loss – the Survival of Rural Traditional Buildings in Northern Ireland’ published by the Department, March 1998. <i>A ‘Locally Important Building’ is a building, structure or feature, whilst not statutory listed, that has been identified by the Council as an important part of their heritage, due to its local architectural or historic significance.</i>”</p> <p>(Ref: MC42 Minor Changes Schedule)</p>
<p>RSPB NI recommend that the policy be amended to include the following:</p> <p><u><i>‘Any extensions, alterations or adaptations should not result in a net loss of biodiversity, and where possible enhance thereby contributing to net gain.’</i></u></p>	<p>The Council notes the comment. This operational policy is for the conversion and reuse of non-listed buildings. It does not include policy references to impacts on natural heritage or biodiversity as developers are required to assess the impacts through biodiversity checklists and are directed by Operational Policies NH2 and NH5 of the dPS and/or non-planning legislation for the protection of natural habitats (e.g. the Wildlife Order).</p>

## Operational Policy HE14 Enabling Development

There was one representation received in respect of Operational Policy HE14 Enabling Development.

### Respondents

Reference Number	Respondent
DPS-030	Department for Communities, Historic Environment Division (HED)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>HED recommend the J&amp;A text in the fifth paragraph is amended to include the requirement for applications to outline the significance of the place, in a conservation statement.</p> <p><i>'This statement should include a <u>conservation statement or plans and sufficient, detailed financial information as is necessary to allow the Council, and or its consultees to make an informed decision upon the application.</u></i></p>	<p>The Council notes the comment and proposes for clarity, as a focussed change, to amend paragraph 5 of the J&amp;A of HE14, page 84, as follows:</p> <p><i>"This statement should include <a href="#">a conservation statement or plans and</a> sufficient, detailed financial information as is necessary to allow the Council, and or its consultees to make an informed decision upon the application."</i></p> <p><a href="#">(Ref: FC10 Focussed Changes Schedule)</a></p>

## 10. NATURAL HERITAGE

### Operational Policy NH1 European and Ramsar Sites - International

There were two representations received in respect of Operational Policy NH1 European and Ramsar Sites – International.

#### Respondents

Reference Number	Respondent
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DSP-109	Department for Infrastructure (DfI)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIEA does not consider the policy unsound but it would have been good practice to copy across the equivalent policy from PPS2, including the word 'and' following each requirement in exceptional circumstances.	<p>The Council notes the comment and agrees that the word 'and' should be inserted. The Council proposes for clarity, as a minor change, to insert the word 'and' into the policy, page 85, paragraphs 3 and 4 as follows:</p> <p>"In exceptional circumstances, a development proposal which could adversely affect the integrity of a European or Ramsar site may only be permitted where:</p> <ul style="list-style-type: none"> <li>a) there are no alternative solutions; <i>and</i></li> <li>b) the proposed development is required for imperative reasons of overriding public interest; <i>and</i></li> <li>c) compensatory measures are agreed and fully secured.</li> </ul> <p>As part of the consideration of exceptional circumstances, where a European or a listed or proposed Ramsar site hosts a priority habitat or priority species listed in Annex I or II of the Habitats Directive, a development proposal will only be permitted when:</p> <ul style="list-style-type: none"> <li>a) it is necessary for reasons of human health or public safety or there is a beneficial consequence of primary importance to the environment; <i>and</i></li> <li>b) agreed in advance with the European Commission." <p><a href="#">(Ref: MC43 Minor Changes Schedule)</a></p> </li></ul>
DfI notes that the SPPS (paragraph 6.178) states; 'A development proposal which could adversely affect the integrity of a European or Ramsar site may only be permitted in	The Council notes and agrees with the comment. Please see Council consideration for NIEA comment above.

exceptional circumstances as laid down in the relevant statutory provisions'. Whilst the Department acknowledges this policy provides criteria for 'exceptional circumstances', it is not clear that all the criteria must be satisfied, in line with the SPPS paragraph 6.180.

\*NB: The Department has made reference to paragraph 6.180 of the SPPS however this relates to protected species Policy NH2 (not NH1) so the Council considers that comment under Policy NH2.

## Operational Policy NH2 Species Protected by Law

There were two representations received in respect of Operational Policy NH2 Species Protected by Law.

### Respondents

Reference Number	Respondent
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIEA do not considered the policy to be unsound but it would have been good practice to copy across the equivalent policy from PPS2, including the word 'and' following each requirement in exceptional circumstances.	<p>The Council notes the comment and agrees that the word 'and' should be inserted. (The Council also notes the error which occurred under part b) which should have consisted of two separate points.) The Council proposes for clarity, as a minor change, to insert the word 'and' into Policy NH2, page 86, paragraph 2 as follows:</p> <p>"In exceptional circumstances a development proposal that is likely to harm these species may only be permitted where:</p> <ul style="list-style-type: none"> <li>a) there are no alternative solutions; <i>and</i></li> <li>b) it is required for imperative reasons of overriding public interest; <i>and</i></li> <li>c) there is no detriment to the maintenance of the population of the species at a favourable conservation status; <i>and</i></li> <li><del>e</del>d) compensatory measures are agreed and fully secured." <p>(Ref: MC44 Minor Changes Schedule)</p> </li></ul>
DfI notes that this policy condenses existing policy criteria, and as above in NH1, it is not clear that all the criteria must be satisfied, in line with the SPPS paragraph 6.180.	The Council notes and agrees with the comment. Please see 'Council Consideration' to NIEA comment above.



## Operational Policy NH3 Sites of Nature Conservation Importance – National

There were three representations received in respect of Operational Policy NH3 Sites of Nature Conservation Importance – National.

### Respondents

Reference Number	Respondent
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIEA supports the policy.	The Council welcomes the supportive comment.
RSPB NI comments that given the absence of a marine area within the LCCC boundary, reference to a Marine Conservation Zone has been removed from the main policy wording, however, it remains within the J&A section. It is recommended that the reference is either removed from the J&A section or added to the main text wording for consistency.	The Council notes the comment. In recognising there are no Marine Conservation Zones within its boundary, the Council did not transpose the category (Marine Nature Reserve), as then described, from Policy NH3 of Planning Policy Statement 2. Whilst the Council has no sea areas, including the intertidal zone, the representation from RSPB NI has highlighted that development proposals within the Council boundary may still have adverse effects on Marine Conservation Zones. To also reflect the requirements of paragraphs 6.183 and 6.49 of the SPPS the Council proposes for clarity, as a minor change, to insert reference to Marine Conservation Zone to paragraph 1 of Policy NH3 (with footnote), page 86, as follows: <ul style="list-style-type: none"> <li>a) an Area of Special Scientific Interest</li> <li>b) a National Nature Reserve</li> <li>c) a Nature Reserve</li> <li>d) <i>a Marine Conservation Zone</i><sup>1</sup></li> </ul> <a href="#">(Ref: MC45 Minor Changes Schedule)</a>
DfI welcomes the information supplied in relation to National Designations, aligning with the SPPS paragraph 6.183, however, the definition of a 'Marine Conservation Zone' is contained within the J&A but there is no reference to it in the policy.	The Council notes and agrees with the comment. Please see 'Council Consideration' to RSPB NI comment above.

<sup>1</sup> Paragraph 215 of the Draft Marine Plan for Northern Ireland, April 2018

### **Operational Policy NH4 Sites of Nature Conservation Importance – Local**

There was one representation received in respect of Operational Policy NH4 Sites of Nature Conservation Importance – Local.

#### **Respondents**

<b>Reference Number</b>	<b>Respondent</b>
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)

#### **Council Consideration of Issues Raised**

<b>Main Issue(s) Raised</b>	<b>Council Consideration</b>
NIEA supports the policy.	The Council welcomes the supportive comment.

## Operational Policy NH5 Habitats, Species or Features of Natural Heritage Importance

There was one representation received in respect of Operational Policy NH5 Habitats, Species or Features of Natural Heritage Importance.

### Respondents

Reference Number	Respondent
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
NIEA supports the policy.	The Council welcomes the supportive comment.

## Operational Policy NH6 Areas of Outstanding Natural Beauty

There were two representations received in respect of Operational Policy NH6 Areas of Outstanding Natural Beauty.

### Respondents

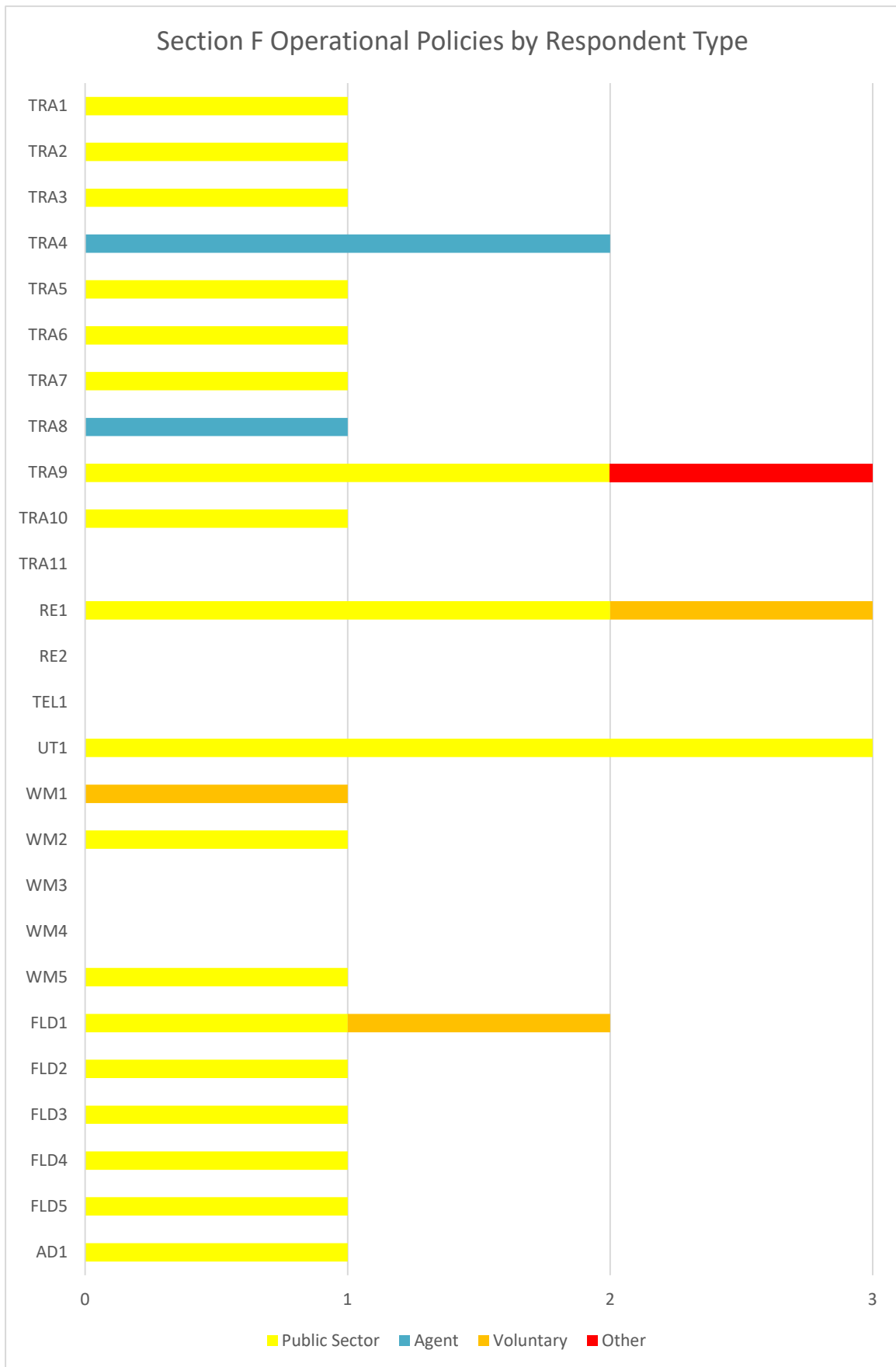
Reference Number	Respondent
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>NIEA do not consider the policy to be unsound but it would have been good practice to copy across the equivalent policy from PPS2, including the word 'and' following each requirement in exceptional circumstances.</p> <p>NIEA comments that the J&amp;A 2<sup>nd</sup> paragraph should include 'recreation' as an attribute in addition to those listed.</p>	<p>The Council notes the comment however would point to the last part of the opening sentence which states that "Planning permission...will only be granted where it is of an appropriate design, size and scale for the locality and <u>all the following criteria are met...</u>"</p> <p>The Council therefore considers that a change to the policy is not in this case necessary.</p> <p>The Council notes the comment, however the word 'recreation' is an additional word that does not appear within the SPPS policy, paragraph 6.186. As such the Council does not intend to include the additional text with the J&amp;A of Policy NH6.</p>
<p>DfI notes that there is only 1 AONB (identified on Maps 4, 9 &amp; 12), of which the Lagan Valley Regional Park (LVRP) is a significant part. There appears to be a lack of policy in relation to the LVRP. It is noted that this Regional Park is referred to throughout Part 1 of the LDP but this does not follow through into operational policy in Part 2 and there is no reference to the LVRP within this this policy.</p> <p>The SPPS (paragraphs 6.186 – 6.188) relate to Areas of Outstanding Natural Beauty. Specifically, paragraph 6.187 states that proposals within AONBs must 'be sensitive to the distinctive special character of the area and the quality of their landscape, heritage and wildlife...' Council should consider an approach more in line with the SPPS.</p>	<p>The Council notes the comment in relation to a separate policy for LVRP. However, the Council would point out that the LVRP was inserted into BMAP as an AONB designation, which is carried forward under the Council's transitional arrangements. It is therefore considered that this is a matter to be addressed within the Local Policies Plan.</p> <p>The Council notes the comment and agrees that this alignment to the SPPS would be beneficial. The Council proposes for clarity, as a minor change, to amend paragraph 1 of Policy NH6, page 88, as follows: "Planning permission for new development of an appropriate design, size and scale for its locality within an Area of Outstanding Natural Beauty (AONB) will only be granted where it is of an appropriate design, <i>size and scale for the</i></p>

	<p><del>locality</del> <i>is sensitive to the distinctive special character of the area and the quality of its landscape, heritage and wildlife, and where all the following criteria are met".</i> (Ref: MC46 Minor Changes Schedule)</p>
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**F: A CONNECTED PLACE**



## 11. ACCESS AND TRANSPORT

### Operational Policy TRA1 Creating an Accessible Environment

There was one representation received in respect of Operational Policy TRA1 Creating an Accessible Environment.

#### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (Dfi)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Dfi comment on the reference within the J&A to DCAN 11 'Access for People with Disabilities' and draft DCAN 11 'Access for All'. They advise that the Department clarified its position in relation to extant planning guidance, please refer to the strategic response and Department's website for further details.	The Council notes the Department has withdrawn these advice notes since the dPS was published. The Council proposes for clarity, as a minor change, to amend the last paragraph of the J&A of policy TRA1, page 92, as follows: "Further information on designing for a more accessible environment is set out in the Department's <del>the Department's Development Control Advice Note (DCAN) 11 'Access for People with Disabilities', draft DCAN 11 'Access for All' and</del> 'Creating Places – Achieving Quality in Residential Developments' (May 2000) <del>documents.</del> " (Ref: MC47 of Minor Changes Schedule)
Dfi comment on page 92, TRA1, bullet point C, consider including reference to cycling in line with Dfi Guidance on the Preparation of LDP Policies for Transport (Issued January 2019);	The Council proposes for clarity, as a focussed change, to amend bullet point c) of Policy TRA1, page 92, as follows: "c) priority pedestrian <i>and cycling</i> movement within and between land uses" (Ref: FC11 Focussed Changes Schedule)
Dfi seeks Council consideration of the inclusion as a Key Policy Consideration 'Integration of Land Use and Transportation', as outlined in Dfi Guidance on the Preparation of LDP Policies for Transport (issued January 2019).	The Council notes the comments and considers that the integration of land use and transportation is critical to the zoning of land at Local Policies Plan Stage. New Transport schemes will be identified in the Local Transport Plan and new Belfast Metropolitan Transport Plan at the Local Policies Plan Stage. The Dfi guidance referred to, makes it clear that the integration of land use and transportation is a strategic, rather than an operational issue, which is adequately dealt with under Part 1 of the dPS.

## Operational Policy TRA2 Access to Public Roads

There was one representation received in respect of Operational Policy TRA2 Access to Public Roads.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
DfI comment on page 93, TRA2, J&A, second last paragraph – refers to the ‘Department’ but this should be the ‘Council’.	The Council notes the error and proposes for clarity, as a minor change, to amend the second last paragraph of the J&A, page 93, as follows: “For development proposals involving a replacement dwelling in the countryside, where an existing access is available but does not meet the current standards, the <i>Department Council</i> would encourage the incorporation of improvements to the access in the interests of road safety.” (Ref: MC48 of Minor Changes Schedule)



## Operational Policy TRA3 Access to Protected Routes

There was one representation received in respect of Operational Policy TRA3 Access to Protected Routes.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>Dfi welcomes that this policy in relation to 'Access to Protected Routes' aligns with regional policy (paragraph 6.301 of the SPPS). However Policy TRA3 Other Protected Routes - Outside Settlement Limits does not align with existing policy. The Council policy provides for a relaxation indicating that permission will be granted for a direct access.....' where it is demonstrated that access cannot reasonably be obtained from an adjacent minor road'.</p> <p>Dfi also comment regarding page 94, TRA3 Access to Protected Routes, Other Protected Routes – Outside Settlement Limits – The Plan Strategy as currently drafted would permit direct access onto the Protected Route Network Outside Settlement Limits where access cannot be reasonably obtained from an adjacent minor road. This proposed wording does not align with the Strategic Planning Policy Statement for Northern Ireland (SPPS) and Dfi Guidance on the Preparation of LDP Policies for Transport (issued January 2019). The reason why this is important is the Protected Route Network are main roads that facilitate the efficient movement of traffic over long distances throughout Northern Ireland. These roads are regionally significant, rather than just serving an individual council area. They contribute significantly to economic prosperity by providing efficient links between all the main towns, airports and seaports, and with the Republic of Ireland. LCCC should amend the wording of TRA3 Access to Protected Routes to align with the SPPS and Dfi Guidance.</p>	<p>The Council notes the comment and considers there is merit in aligning the wording of the policy with paragraph 6.301 of the SPPS so that there is no confusion between the interpretation of the two. The Council proposes for clarity, as a focussed change, to amend Policy TRA3, under subheading 'Other Protected Routes – Outside Settlement Limits' page 94, as follows:</p> <p>"Other Protected Routes – Outside Settlement Limits</p> <p>Planning permission will only be granted for a development proposal involving direct access, or the intensification of the use of an existing access <i>where it is demonstrated that access cannot reasonably be taken from an adjacent minor road. in the following circumstances: An exception will apply For a replacement dwelling in accordance with Policy COU3 where the dwelling to be replaced is served by an existing vehicular access onto the protected route; for a farm dwelling or a dwelling serving an established commercial or industrial enterprise where access cannot be reasonably obtained from an adjacent minor road; and, for other developments which would meet the criteria for development in the countryside, where access cannot be reasonably obtained from an adjacent minor road.</i></p> <p>In all cases the proposed access must be in compliance with the requirements of Policy TRA2."</p> <p>(Ref: FC12 Focussed Changes Schedule)</p>
<p>Dfi is content that this matter can be covered satisfactorily under TRA4 by adding reference to the forthcoming Local Transport Plan and the new BMTP.</p>	<p>The Council notes the comment, however it is considered that there are sufficient references to the Local Transport Plan and new Belfast Metropolitan Transport Plan contained within</p>

	<p>Part 1 of the dPS, for example Strategic Policy 20 – Transport Infrastructure, page 39 to 143. As such the Council does not intend to add further references to these in Policy TRA3.</p>
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## Operational Policy TRA4 Protection for New Transport Schemes

There were two representations received in respect of Operational Policy TRA4 Protection for New Transport Schemes.

### Respondents

Reference Number	Respondent
DPS-033	Clyde Shanks on behalf of Neptune Carleton
DPS-098	Gravis Planning on behalf of Fraser Houses Ltd

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Clyde Shanks on behalf of Neptune Carleton is supportive in the protection of the Knockmore Link Road as a new transport scheme.	The Council welcomes the supportive comment.
<p>Gravis Planning on behalf of Fraser Houses Ltd suggest the policy is considered 'too ambiguous at this stage, given that we do not yet know what transport schemes are being brought forward as the LTS does not list specific infrastructure schemes. The intention is that this provides more flexibility, with detail of specific schemes being identified at the LPP stage when land use zonings are identified, thereby integrating land use proposals and transportation.</p> <p>Should the Quarry Corner-Comber Road proposal be retained as a non-strategic proposal at LPP stage, we do not support the policy.</p> <p>On the above basis, we would encourage the Council to consider the removal of the non-strategic road proposal from the emerging local plan given the arguments set out within. The land should be returned to the landowner and progressed in line with its zoning for housing and be redeveloped for that purpose.'</p>	The Council notes the comments, however this representation is site specific, only objecting to the principle of the policy on the basis that it may affect a zoning that is shown in BMAP. The implementation of specific schemes will be identified in the Local Transport Plan and new Belfast Metropolitan Transport Plan at the Local Policies Plan Stage.

## Operational Policy TRA5 Strategic Greenways and Disused Transport Routes

There was one representation received in respect of Operational Policy TRA5 Strategic Greenways and Disused Transport Routes.

### Respondents

Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council (ABC)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
ABC welcomes Policy TRA5 which protects these routes and promotes appropriate opportunities for their re-use such as Strategic Greenways, which have been identified within DfI's Strategic Plan for Greenways. The policy reflects ABC's preferred approach.	The Council welcomes the supportive comment.

## Operational Policy TRA6 Transport Assessment

There was one representation received in respect of Operational Policy TRA6 Transport Assessment.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>DfI comment regarding page 95, TRA 6 that LCCC should consider: the need to monitor and review; and possible enforcement, in relation to Travel Plans.</p> <p>DfI comment that they would prefer to see the reference to Transport Assessment noted under a general provision covering all themes. Alternatively DfI suggest it should appear at the front of the Transport theme section with supporting text to explain that it applies to all forms of development with a significant travel generation impact.</p> <p>Additionally DfI would like the supporting text to make clear that a primary aim of the Transport Assessment is firstly to assess accessibility by sustainable modes and to develop measures to maximise use of sustainable modes – only subsequently should the residual traffic be assessed and its impacts ameliorated.</p>	<p>The Council notes the comment. Monitoring and Review is dealt with under Chapter 5 of Part 1 of the dPS. The issue of enforcement is a separate matter that is dealt with by the Council’s Enforcement Unit.</p> <p>The Council proposes for clarity, as a minor change, to include the following paragraph in the J&amp;A of Policy TRA6 (first paragraph), page 95, as follows:</p> <p><i>“Transport Assessment applies to all forms of development with a significant travel generation impact. A primary aim of the Transport Assessment is to assess accessibility by sustainable modes and to develop measures to maximise use of sustainable modes; only subsequently should the residual traffic be assessed and its impacts ameliorated.”</i> (Ref: MC49 Minor Changes Schedule)</p>

## Operational Policy TRA7 Car Parking and Servicing Arrangements in New Developments

There was one representation received in respect of Operational Policy TRA7 Car Parking and Servicing Arrangements in New Developments.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>Dfi comment that the policy states, 'A proportion of the spaces to be provided will be reserved for people with disabilities'. An associated footnote subsequently directs to the 'Department's Development Control Advice Note 11 Access for People with Disabilities (1991), draft DCAN11 Access for All (July 2003) and Creating Places – Achieving Quality in Residential Developments (May 2000)'. The Department has clarified its position in relation to extant planning guidance, please refer to the strategic response and Department's website for further details.</p> <p>Dfi also comment regarding page 96, TRA7, bullet point (a) – LCCC should review the wording of bullet point a) and consider removing the word 'accompanying' in reference to Travel Plans.</p> <p>Page 96, TRA7, bullet points (a-e) - LCCC should review the wording of the bullet points a) – e) and not having an "or" between each bullet point may suggest that all of these circumstances need to apply in order for a reduced level of car parking provision to be acceptable beyond formal areas of parking restraint.</p>	<p>The Council notes the Department has withdrawn these advice notes since the dPS was published.</p> <p>The Council proposes for clarity, as a minor change, to amend footnote 34, page 96, as follows:  "<del>Department's <i>Development Control Advice Note (DCAN) 11 'Access for People with Disabilities'</i>, draft DCAN 11 'Access for All' and 'Creating Places – Achieving Quality in Residential Developments' (May 2000)</del>"  (Ref: MC50 of Minor Changes Schedule)  (See also policy HOU9 above in relation to the matter of DCANs, Ref: MC16 of Minor Changes Schedule.)</p> <p>The Council notes the comment but does not propose to alter the policy, as it is sufficiently clear what is required in the bullet point.</p> <p>The Council confirms in relation to bullet points a) to e) that if 'all' of these criteria were required to be met, then the wording would have been included to reflect this i.e. '<i>...where all of the following criteria have been met</i>'. The Policy does not include this form of wording, meaning that it may be one or more of the bullet points that apply. It is therefore considered that an amendment to the wording of the policy as suggested is not required.</p>

## Operational Policy TRA8 Active Travel Networks and Infrastructure Provision

There was one representation received in respect of Operational Policy TRA8 Active Travel Networks and Infrastructure Provision.

### Respondents

Reference Number	Respondent
DPS-098	Gravis Planning on behalf of Fraser Houses Ltd

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Gravis Planning supports a shift to more sustainable travel modes and reduced reliance on the private car.	The Council welcomes the supportive comment.

## Operational Policy TRA9 Park and Ride/Park and Share Car Parks

There were three representations received in respect of Operational Policy TRA9 Park and Ride/Park and Share Car Parks.

### Respondents

Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council (ABC)
DPS-109	Department for Infrastructure (Dfi)
DPS-111	Joanne Bunting MLA

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
ABC notes the approach to the development of new or extension of existing Park and Ride/Park and Share car parks. ABC Council would welcome clarification regarding the extension of the park and ride car park at Moira train station which would help to alleviate traffic congestion within both Council areas.	The Council notes the comment and post-publication of the dPS is aware that there are proposals for P&R provision at Moira Train Station under consideration by the Council. The Council therefore encourages ABC Council to engage through the Development Management process as appropriate.
Dfi note it is encouraging that TRA9 Park and Ride/Park and Share Car Parks in the J&A features sustainable drainage solutions as a consideration for developers. The focus seems to be on hard parking surfaces. An equal emphasis could be on the use of SuDS in the landscaped areas within a car park. There could be added environmental benefits achieved by this approach.	<p>The Council notes the suggestion and appreciates the benefits that could be achieved by expanding upon the Sustainable Drainage Systems requirements. This is however considered unnecessary duplication of policy contained elsewhere, namely SP24(b) to <i>“encourage the use of Sustainable Drainage Systems to alleviate issues around surface water flooding”</i>; and Policy FLD3 which requires a Drainage Assessment for development proposals to demonstrate surface water flooding can be mitigated.</p> <p>The Council recognises that park and ride sites largely consist of hard surfaces and would encourage the Department to consult with Translink as a development partner in this regard.</p> <p>The Council also highlights that page 3 of the Preamble makes it clear that the operational policies must not be read in isolation from one another. Proposals must comply with all policy requirements contained in the operational policies, where relevant to the development.</p>
An MLA points out that Dundonald Park and Ride is routinely at over-capacity and the current facility is inadequate to support usage at peak times. Commuter parking capacity and	The Council notes the comments and would point out that the provisions of TRA9 address this concern, where a need is identified. The Council therefore encourages the exploration of an extension to this facility, however



<p>public transport are the main issues for what is a growing community/settlement.</p>	<p>suggests this should be done through joint consultation with DfI and Translink , as new Transport schemes will be identified in the Local Transport Plan in context of the wider new Belfast Metropolitan Transport Plan, at the Local Policies Plan Stage.</p>
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## Operational Policy TRA10 Provision of Public and Private Car Parks

There was one representation received in respect of Operational Policy TRA10 Provision of Public and Private Car Parks.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (DfI)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>DfI suggest on page 98, TRA10 - LCCC should review the wording of bullet point a) and provide a broader test of need in case the Local Transport Plan does not include this level of detail.</p> <p>DfI also comment that it is content that this matter can be covered satisfactorily under TRA10 by adding “and the Council’s Parking Strategy where applicable”.</p>	<p>The Council notes the comment and considers that the issue of car parking is a matter to be addressed jointly by the Department and Councils, either through the Local Policies Plan <u>or</u> a comprehensive Car Parking Strategy. The Council proposes for clarity, as a minor change, to amend bullet point a) of Policy TRA10, page 98, as follows:</p> <p>a) they meet a need identified by the Department’s Local Transport Plan or <i>a comprehensive Car Parking Strategy prepared jointly with the Department, where applicable.</i>”</p> <p>(Ref: MC51 Minor Changes Schedule)</p>

## **Operational Policy TRA11 Temporary Car Parks**

There were no representations received in respect of Operational Policy TRA11 Temporary Car Parks.

## 12. RENEWABLE ENERGY

### Operational Policy RE1 Renewable Energy Development

There were three representations received in respect of Operational Policy RE1 Renewable Energy Development.

#### Respondents

Reference Number	Respondent
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (Dfi)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA) suggest it would be beneficial to list specific habitats and landforms which wind farms will not be built upon, for example Active Peatland, other priority habitats and Strategic Landscape Policy Areas.	The Council is of the opinion that the policy is sufficiently robust and in accordance with the SPPS. The requirement to list specific areas has not been accompanied by a suitable evidence base. The Council is happy to engage with NIEA in wider discussions regarding potential Strategic Landscape Policy Areas.
<p>RSPB NI comment on the following: Operational Policies do not acknowledge/outline how the LDP proposes to deal with applications for the re-use, refurbishment, repair and repowering of existing renewable energy development in order to prolong the life span of developments. Currently, policy in this regard is provided at paragraph 4.17 of PPS 18, which deals with the issue of repowering/re-equipping turbines at the end of its planning permission life (in most cases planning permission will be linked to the expected operational life of the turbine). Paragraph 4.27 of the PPS states 'while there are obvious advantages in utilising established sites, such cases will have to be determined on their individual merit and in the light of the then prevailing policy and other relevant considerations'.</p> <p>Suggest the following amendment: The provisions of paragraph 4.17 of PPS 18 require to be copied across as follows: 'Applications for the re-use, refurbishment, repair and repowering of existing renewable</p>	<p>The Council notes the comments and the suggested modification. Reference to the extant PPS18, paragraph 4.17 is contained within the J&amp;A as opposed to policy. The Council's Policy RE1 does state in its J&amp;A that the policy will apply to all renewable energy proposals, which would include the repowering of existing sites. However, the Council takes note of the comment and agrees this would be beneficial. The Council proposes for clarity, as a minor change, to amend paragraph 3 of the J&amp;A, page 100, as follows: "All renewable energy proposals, <i>including proposals to reutilise established sites</i>, will be assessed against this planning policy, having regard to the Department publication Best Practice Guidance..." <a href="#">(Ref: MC52A Minor Changes Schedule)</a></p>

energy development in order to prolong the life span of developments such as wind farm and solar farms will have to be determined on their individual merit and in the light of the then prevailing policy and other relevant factors including not resulting in unacceptable impacts on the environment or residential/visual amenity'.

The dPS is silent on its approach to renewable energy on active peatland. Policy RE1 of PPS18 in relation to wind energy development states 'any development on active peatland will not be permitted unless there are imperative reasons of overriding public interest', while the more recently published SPPS widens out the scope of such a restriction to fill renewable energy developments as follows:

'6.226 Active peatland is of particular importance to Northern Ireland for its biodiversity, water and carbon storage qualities. Any renewable energy development on active peatland will not be permitted unless there are imperative reasons of overriding public interest as defined under The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 as amended'.

Suggest the following amendment:  
Either Strategic Policy 21 or Operation Policy RE1 of the dPS, should be amended with the following text inserted in the general policy wording applicable to all energy development: 'Any renewable energy development on active peatland will not be permitted unless there are imperative reasons of overriding public interest as defined under The Conservation (Natural Habitats. etc.) Regulations (Northern Ireland) 1995 as amended'.

In a similar vein, neither Strategic Policy 21 or Operational Policy RE1 of the dPS make reference for the need to consider the cumulative impact of all types of renewable energy development. In this regard, paragraph 6.229 of the SPPS provides for the cumulative assessment of all renewable energy developments, so as to be effective in preventing unacceptable adverse impact and accord with the SPPS.

Suggest the following amendment:

The Council considers that although there are limited peatlands within its area, it is noted that the policy text as suggested is contained in paragraph 6.226 of the SPPS. The Council also notes that Policy RE1 gives protection from adverse impact to peatland through criteria c) – biodiversity or the natural and historic environment. Nevertheless the Council feels RSPB NI has drawn its attention to an important link to the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 as amended. As such the Council therefore proposes for clarity, as a focussed change, to amend paragraph 1 of the J&A to Policy RE1, page 100, as follows:

“Proposals likely to result in unavoidable environmental damage should indicate how this will be minimised and mitigated. *“Any renewable energy development on active peatland will not be permitted unless there are imperative reasons of overriding public interest as defined under The Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995 as amended.”*

(Ref: FC13 Focussed Changes Schedule)

The Council considers there is merit in the points raised in the representation and alignment of the policy with paragraph 6.229 of the SPPS. The Council proposes for clarity, as a minor change, to include the following paragraph in the J&A of Policy RE1 (before the final paragraph), page 100, as follows:

*“All renewable energy proposals will be assessed in accordance with normal planning criteria including such considerations as access arrangements, road safety, good design, noise*

Proposed additional wording to be included within Strategic Policy 21 or Operational Policy RE1 of the dPS as follows:

'Applications for renewable energy development will be required to demonstrate that the development has taken into consideration the cumulative impact of existing renewable energy developments, those which have permissions and those that are currently the subject of valid but undetermined applications'.

Other factors for consideration are included within paragraphs 6.228 and 6.229 of the SPPS, and importantly paragraph 6.229 of the SPPS provides for the consideration of the inter-relation between these considerations - this is also absent from dPS Policy RE1 and needs to be copied across from the SPPS.

A sentence at the end of general policy wording within the text box as follows would accord with the provisions of paragraph 6.229 of the SPPS as follows:

'It will be necessary to consider the inter-relational between both the above-mentioned considerations and other relevant policies within this plan'.

Furthermore, dPS Policy RE1 makes no reference to 'information requirements' as currently set out at paragraphs 4.18-4.21 of PPS18. As a minimum, the J&A section of dPS Policy RE1 should set out that certain proposals depending on their scale or location may be subject to the Environmental Impact Assessment Process (under the provisions of the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.

Furthermore, dPS Policy RE1 should indicate that where renewable energy development does not fall within the requirements of the EIA Regulations, the Planning Authority will still expect an assessment of the environmental effects of the development to be submitted with any application. The level of detail required should reflect the scale of the technology employed and take account of location'.

The Council should also draw the attention to prospective developers of renewable energy

*and shadow flicker, separation distance, cumulative impact, communications interference and the inter-relationship between these considerations."*

(Ref: MC52C Minor Changes Schedule)

The Council notes the comment, this is proposed within the minor change referred to above.

The Council notes the comments, particularly in relation to the EIA regulations, however would point out that these matters are referred to in supplementary planning guidance which is referred to under the J&A to Policy RE1 (dPS, Part 2, page 100). Further guidance is also provided on the 'Explanatory Notes for Applicants' which accompanies the P1 planning application form and is available on the Department's public access NI website. The Council therefore does not intend to expand on this point given the direction to these other guidance documents.

However, the highlighting of this matter has raised issues with the clarity expressed in paragraph 3 of the J&A, page 100. The Council proposes for clarity, as a minor change, to amend paragraph 3 of the J&A, page 100, as follows:

"All renewable energy proposals will be assessed against this planning policy having regard to the *following* Department publications: Best Practice Guidance to

<p>projects to the Conservation (Natural Habitats, etc) Regulations (NI) 1995 (as amended) where the 'competent authority' is required to undertake an Appropriate Assessment of any proposal that has the potential to significantly affect a European Site, either directly or indirectly. In such cases, developers must provide such information as the competent authority may reasonably require. The inclusion of such text within the J&amp;A section within Policy RE1 will provide clarity for developers and stakeholders alike.</p>	<p>Renewable Energy (published <del>by the former Department of Environment</del> 2009), <i>Draft Supplementary Planning Guidance Anaerobic Digestion (published 2013)</i>; and Wind Energy Development in Northern Ireland's Landscapes' (<i>published 2009</i>) in assessing all wind turbine proposals." (Ref: MC52D Minor Changes Schedule)</p> <p>In relation to the reference to the Conservation (Natural Habitats, etc) Regulations (NI) 1995 (as amended) this has now been proposed as a minor change to Policy RE1, paragraph 3, as referred to above.</p>
<p>Department for Infrastructure (Dfi) notes that paragraph 6.223 of the SPPS states that a cautious approach for Renewable Energy development proposals will apply within designated landscapes. However, Council's policy RE1 has no reference to this 'cautious approach'. Dfi does note Council's policy SP21 proposes a 'precautionary approach' to renewable development proposals but as SP21 refers to Policy RE1 (and RE2) this precautionary approach should also be reflect in their policy text.</p> <p>Dfi notes that the Council has omitted reference to water 'quantity' in bullet point d) of policy RE1, this should be included in line with paragraph 6.224 of the SPPS.</p> <p>Dfi notes that in relation to wind energy development, the Council has combined reference to wind turbines and wind farm proposals within Policy RE1, this creates ambiguity between the requirements for single turbines or a group of turbines within a wind farm.</p>	<p>The Council notes the comments and has proposed to amend the wording of Policy SP21 Renewable Energy, Part 1, of this dPS from 'precautionary approach' to 'cautious approach', as reflective of paragraph 6.223 of the SPPS (Ref: FC3 Focussed Changes Addendum). However, as each policy of the Plan Strategy must not be read in isolation from any other, either in or between Parts 1 and 2, or in regional policy such as the SPPS, the Council does not propose to change Policy RE1 by further addition of the 'cautious approach'.</p> <p>The Council notes the omission and proposes for clarity, as a minor change, to amend paragraph 1, part d) of Policy RE1, page 100, as follows:  <i>"d) local natural resources, such as air quality or water quality or quantity"</i>  (Ref: MC52B Minor Changes Schedule)</p> <p>The Council notes the comment and agrees that the final paragraph of Policy RE1 is ambiguous and not in conformity with either the SPPS or Best Practice Guidance to Renewable Energy (published by the former DoE 2009). The Council proposes for clarity, as a minor change, to amend the 5<sup>th</sup> paragraph of Policy RE1, page 100, as follows:  <del>"Wind turbines must have</del> <i>For wind farm development</i> a separation distance of 10 times rotor diameter to occupied property, with a minimum distance not less that 500m <del>for wind farm proposals,</del> <i>will generally apply."</i>  (Ref: MC52E Minor Changes Schedule)</p>

Dfl notes that the J&A refers to best practice and supplementary guidance but that the policy would greatly benefit from further detail as set out in paragraph 6.228 and 6.229 of the SPPS. Examples given are important aspects of policy delivery and should be within the LDP.

The Council notes the suggestion, the aspects to which Dfl refer are contained in 6.229 of the SPPS and, importantly, more detailed information on these are set out in regional guidance which is to be retained, unless and until replaced by the Department. The tests of Policy RE1 (a to e) are to ensure there is no unacceptable adverse impact from proposed development. The J&A to the policy refers to regard being given to 3 additional guidance documents, all retained by the Department. The Council does not see a need to add additional wording to the policy when these guidance documents sufficiently illustrate such matters to be considered by developers of renewable energy proposals if they are to satisfy the policy tests of RE1.



## **Operational Policy RE2 Integrated Renewable Energy**

There were no representations received in respect of Operational Policy RE2 Integrated Renewable Energy.

### **13. TELECOMMUNICATIONS**

#### **Operational Policy TEL1 Telecommunications Development**

There were no representations received in respect of Operational Policy TEL1 Telecommunications Development.

## 14. UTILITIES

### Operational Policy UT1 Utilities

There were three representations received in respect of Operational Policy UT1 Utilities.

#### Respondents

Reference Number	Respondent
DPS-060	Department of Agriculture, Environment and Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-096	Northern Ireland Electricity Networks (NIE Networks)
DPS-109	Department for Infrastructure (DfI)

#### Council Consideration of Issues Raised

Main Issue	Council Consideration
NIEA supports the policy in principle and agrees that overhead cables should have regard to designated areas of landscape, minimise visual intrusion and avoid areas of nature conservation. The avoidance of areas of nature conservation in this policy appears to be only subject to overhead cables. It would be beneficial for new underground utilities to avoid areas of natural environment or nature conservation. The excavation/installation required for underground utilities could have a significant impact on these features.	<p>The Council notes the comments but suggests that the provision of other utilities, namely water, waste water or gas, is associated with development that is policy compliant in the first instance (for example in relation to housing or other development) and that these services are provided underground including septic tanks for single dwellings in the countryside.</p> <p>The Council however accepts that the policy should reflect paragraph 6.239 of the SPPS regarding visual and environmental impact. The Council proposes for clarity, as a focussed change, to amend the first sentence of Policy UT1, page 104, as follows:</p> <p><i>“To ensure that the visual and environmental impact of utility development is kept to a minimum, the provision of utility services...”</i>  <a href="#">(Ref: FC14A Focussed Changes Schedule)</a></p> <p>*See also Council consideration of NIE Networks below</p>
The first line of the policy notes a presumption in favour of undergrounding electricity infrastructure to new developments. NIE Networks do not believe this is a sound policy. The cost of new connections is paid for through a Distribution Use of System (DUoS) tariff which is charged to all NI electricity customers as part of their billing. As such the Utility Regulator for NI places a legal obligation on NIE Networks to offer the ‘least cost, technically acceptable’ solution for a new connection or alteration to	The Council notes the comments and understands there are circumstances where underground provision of electricity connections may not be feasible and viable. It is acknowledged that there remains a significant amount of above ground electricity cabling in the rural area and in some urban areas, particularly older developed parts of settlements. It is also of note that the provisions of Part 14 of the Planning (General Permitted Development) Order (NI) 2015

the network to facilitate development. In the majority of rural and suburban areas, this will always be an overhead line connection. If a planning application for an overhead connection was refused NIE Networks would have to re quote for more expensive options. The technical issues with undergrounding will almost always deem this as the more expensive solution. Increased costs to connect may be prohibitive and meaning developments may not proceed and cause detriment to rural and urban communities or new/expanding commercial growth. There does not appear to be any evidence base in terms of costing/cost-benefit analysis or a review of the technical constraints involved in undergrounding in the Development Plan documents to support this strict policy and consider its implications for new connections within the wider Council area. Policy UT1 fails to take account of emerging Government policy in relation to securing more energy from renewable sources. The policy is not sufficiently flexible to facilitate the provision of essential electrical infrastructure to meet these Government objectives.

With the exception of the first line, this policy provides guidance solely for the development of electricity infrastructure. In this context Council may wish to reconsider the title of this policy.

It is recognised that electricity infrastructure may have potential visual and other environmental impacts, and it is appropriate to assess and balance such impacts against the need for the project. As such, the policy approach needs to build in an element of reasonable flexibility. Policy makers cannot anticipate all situations or proposals, and as such, it must allow for every case to be considered separately and on its own merits.

NIE Networks suggests the strategic/regionally important network be given appropriate weight in the planning balance which is in line with existing policy documents, including impacts on nature conservation sites and the landscape generally in PPS2. The current policy approach

currently caters for above ground service wire provision to consumers, subject to the line not exceeding 400 metres in length, and not being within a conservation area, AONB or National Park.

That being said, the Council accepts that Policy UT1 lacks clarity in cases where overhead networks in settlements are established, and an extension to that network is required, but goes beyond the scope of permitted development. Policy UT1 does state exceptions for rural development proposals, in villages and smaller settlements because it is recognised that the smaller scale of development can make costs of connection prohibitive.

The SPPS states at paragraph 6.239, page 94 the regional strategic objectives are to 'ensure that the visual and environmental impact of telecommunications and other utility development is kept to a minimum'. As indicated in the focussed change above, it is proposed to reference this in the opening sentence to Policy UT1.

NIE Networks suggest the use of 'significant' and 'where possible' in relation to nature conservation, historic environment or archaeological interest contained in criteria b) of Policy UT1. The Council proposes for clarity, as a focussed change, to amend Policy UT1, Part b) to included 'where possible' but not the inclusion of 'significant' as this is adequately dealt with under the Natural Heritage Policies NH1-NH6 contained within Part 2 of the dPS.

The Council proposes for clarity, as a focussed change, to amend Policy UT1, page 104, as follows:

*"To ensure that the visual and environmental impact of utility development is kept to a minimum, the provision of utility services such as water, wastewater, electricity and gas to new development proposals should be laid underground where considered feasible and viable.*

*An exception will be permitted in rural locations including villages and small settlements for overhead electricity lines and poles serving new development, where underground provision is not feasible or viable.*

Proposals for all overhead electricity lines and associated infrastructure, either regional

<p>and wording does not allow adequate flexibility to exercise planning judgement.</p> <p>Taking account of the issues raised NIE Networks suggests an alternative wording to the policy which addresses these key points;</p> <p><i>'The provision of utility services such as water, wastewater, electricity and gas to new development proposals should be laid underground, <u>where considered feasible and viable.</u></i></p> <p><i>Proposals for all overhead electricity lines and associated infrastructure, either regional transmission or local distribution networks, will be subject to the following:</i></p> <ul style="list-style-type: none"> <li>a) <i>Proposals for pylons, poles and overhead <u>lines must demonstrate that the route minimises visual intrusion by taking appropriate account of the natural features of the environment and having particular regard to designated areas of landscape or townscape sensitivity;</u></i></li> <li>b) <i>Avoidance of areas of <u>significant</u> nature conservation, historic environment or archaeological interest, <u>where possible;</u></i></li> <li>c) <i>Wirescape should be kept to a minimum;</i></li> <li>d) <i>Associated infrastructure works should be visually integrated, making use of existing and proposed landscaping;</i></li> </ul> <p><i>Proposed power lines should comply with the 1998 International Commission on Non-Ionizing Radiation Protection (ICNIRP)</i></p>	<p>transmission or local distribution networks, will be subject to the following:</p> <ul style="list-style-type: none"> <li>a) pylons, poles and overhead lines should follow natural features of the environment, having regard to designated areas of landscape or townscape sensitivity, to minimise visual intrusion;</li> <li>b) Avoidance of areas of nature conservation, historic environment or archaeological interest, <i>where possible;</i></li> <li>c) Wirescape should be kept to a minimum;</li> <li>d) Associated infrastructure works should be visually integrated, making use of existing and proposed landscaping;</li> </ul> <p>⇒ <i>Proposed power lines should comply with the 1998 International Commission on Non-Ionizing Radiation Protection (ICNIRP)."</i></p> <p><a href="#">(Ref: FC14B Focussed Changes Schedule)</a></p>
<p>Dfl comment that the policy states that services must be laid underground, however, does not make reference to the need for Sewerage and Drainage infrastructure and the need for additional capacity within that infrastructure.</p>	<p>The Council notes the comment, however reference to infrastructure and additional capacity is dealt with either by way of permitted development (Part 14, Class H of the Schedule to the Use Classes Order 2015) or through capacity requirements under operational Policy WM2. There is no need therefore to include reference to capacity within this policy.</p>

## 15. WASTE MANAGEMENT

### Operational Policy WM1 Waste Management Facilities

There was one representations received in respect of Operational Policy WM1 Waste Management Facilities. The representation was received in respect of Strategic Policy 23 Waste Management but warrants further consideration against this policy.

#### Respondents

Reference Number	Respondent
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)

Main Issue(s) Raised	Council Consideration
RSPB NI, in relation to Strategic Policy 23 Waste Management, noted that paragraph 4 of the policy does not go far enough to state application of the 'precautionary principle' on proposals for waste management facilities. This principle is referred to in paragraph 6.322 of the SPPS and paragraph 1.19 of the extant Planning Policy Statement 11 – Waste Management.	<p>The Council noted the comment and included additional text to SP23 (<a href="#">MC9C of Minor Changes Schedule</a>). The Council considers it prudent to replicate that amendment in relation to Policy WM1.</p> <p>The Council proposes for clarity, as a minor change, to amend the J&amp;A, page 106, through inclusion of the following sentence to the end of the fifth paragraph, as follows:</p> <p><i>"In assessing all proposals the Council will be guided by the precautionary approach in accordance with paragraph 6.322 of the SPPS."</i></p> <p>(Ref: <a href="#">MC53 Minor Changes Schedule</a>)</p>

## Operational Policy WM2 Treatment of Waste Water

There was one representation received in respect of Operational Policy WM2 Treatment of Waste Water.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>Dfi comment this policy refers to development proposals to provide mains sewage wastewater treatment works. It makes no reference to the need for connection to the existing mains sewerage network or the river network for storm drainage.</p> <p>The 2nd paragraph states 'non mains sewage treatment will only be permitted where it is demonstrated...that there is sufficient capacity to discharge effluent to a Watercourse'. This should be revised to state 'treated effluent'</p> <p>The 2<sup>nd</sup> paragraph also states this should 'not create or add to a pollution problem'. This should be revised to include 'add to or create additional flood risk'.</p> <p>This section also refers to the Department of Agriculture and Rural Affairs (DAERA) – it should state Department for Agriculture, Environment and Rural Affairs.</p>	<p>The Council in decision making takes direction on this matter through statutory consultation with either NI Water, who advise on the capacity of sewerage and storm drainage and its availability, or NIEA with regard to discharge to watercourses.</p> <p>The Council notes the comment and agrees this clarification would be beneficial. The Council proposes for clarity, as a minor change, to insert the word 'treated' into this sentence of Policy WM2, page 107, as follows:  <i>“Development relying on non mains sewage treatment will only be permitted where it is demonstrated to the Council and its statutory consultees that there is sufficient capacity to discharge <b>treated</b> effluent to a watercourse...”</i>  <a href="#">(Ref: MC54A Minor Changes Schedule)</a></p> <p>The Council notes the comment and agrees this clarification would be beneficial. The Council proposes for clarity, as a minor change, to amend paragraph 2 of Policy WM2, page 107, as follows:  <i>“Development relying on non mains sewerage treatment ...and that this will not create or add to a pollution problem <b>or add to or create additional flood risk</b>”.</i>  <a href="#">(Ref: MC54B Minor Changes Schedule)</a></p> <p>The Council notes the error and proposes to amend the J&amp;A on page 107 as follows:  <i>“A consent to discharge under the Water (Northern Ireland) Order 1999 will also be required from the Department <b>ef-for</b> Agriculture, <b>Environment</b> and Rural Affairs (DAERA)...”</i>  <a href="#">(Ref: see Typo List )</a></p>

**Operational Policy WM3 Waste Disposal**

There were no representations received in respect of Operational Policy WM3 Waste Disposal.

**Operational Policy WM4 Land Improvement**

There were no representations received respect of Operational Policy WM4 Land Improvement.



## Operational Policy WM5 Development in the Vicinity of Waste Management Facilities or Wastewater Treatment Works

There was one representation received in respect of Operational Policy WM5 Development in the Vicinity of Waste Management Facilities or Wastewater Treatment Works.

### Respondents

Reference Number	Respondent
DPS-046	Northern Ireland Water (NI Water)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
As a consequence of the issues relating to odour and odour management and the increasing significance of odour management within the water industry NI Water has developed a policy on Development Encroachment/Odour Assessment. This policy has replaced the old cordon sanitaire procedures. NI Water proposes that reference is made to the NI Water Development Encroachment – Odour Assessment Policy and Procedure.	The Council notes the comment and agrees this would be beneficial. The Council proposes for clarity, as a minor change, to amend the J&A of Policy WM5, page 109, by inserting an additional final paragraph as follows: <i>“Where development is to be located in close proximity to an existing or approved NI Water WwTW facility developers should discuss their proposals with NI Water, and may be required to undertake a Development Encroachment/Odour Assessment. Further details are available at: <a href="http://www.niwater.com">www.niwater.com</a>”.</i> (Ref: MC55 Minor Changes Schedule)

## 16. FLOODING

### Operational Policy FLD1 Development in Fluvial (River) Flood Plains

There were two representations received in respect of Operational Policy FLD1 Development in Fluvial (River) Flood Plains.

#### Respondents

Reference Number	Respondent
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)
DPS-109	Department for Infrastructure (Dfi)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>RSPB NI suggest in the interests of clarity and ease of reading it is recommended that the paragraph below be relocated from its current position of second paragraph on page 111 (after Minor Development) to follow on from the current final paragraph of page 110, in order to facilitate a greater read across with the overarching policy.</p> <p>'Where the principle of development is accepted by the Council through meeting any of the above 'Exceptions Test', the applicant is required to submit a Flood Risk Assessment (FRA) to demonstrate that all sources of flood risk to and from the proposed development have been identified; and there are adequate measures to manage and mitigate any increase in flood risk arising from the development'.</p>	<p>The Council considers this to be largely a presentational issue, but is content to move the paragraph referred to, to ensure misinterpretation does not occur. The Council proposes for clarity, as a minor change, to move paragraph 2, page 111, to the second paragraph of Policy FLD1, page 110, as follows: "Where the principle of development is accepted by the Council through meeting any of the <del>above</del> 'Exceptions Tests' the applicant is required to submit a Flood Risk Assessment (FRA)...".</p> <p><a href="#">(Ref: MC56A Minor Changes Schedule)</a></p>
<p>Dfi Rivers agrees with much of this policy however, under Exceptions in Defended Areas, references to a 1 in 100 year flood event should also include the term (AEP of 1%) Annual Exceedance Probability, <i>i.e. 1 in 100 year (AEP 1%) fluvial flood....</i></p>	<p>The Council notes the omission. The policy excludes the use of '(AEP 1%)' as does the SPPS, but an explanation of this terminology is included in the J&amp;A (page 111) that accompanies Policy FLD1. The Council proposes for clarity, as a minor change, to amend the first line of Policy FLD1, page 110, as follows: "New development will not be permitted within the 1 in 100 year fluvial flood plain (<a href="#">AEP of 1%</a>) unless the applicant can demonstrate that the proposal constitutes an exception to the policy in the following cases:"</p> <p>Additionally, the Council proposes to amend the J&amp;A, page 111, to include the following: "For planning purposes, taking into account climate change predictions based on available scientific evidence a fluvial flood plain is</p>

<p>Flood defences which protect previously developed lands are identified on Flood Maps NI.</p> <p>Dfl suggest the last sentence in paragraph 6 of the J&amp;A page 113 is better located within policy.</p> <p>Dfl also seeks a change to the J&amp;A, paragraph 2, page 111 to state 'A fluvial floodplain is defined as the extent of flood event with a 1 in 100 year probability (1% AEP) <u>plus climate change allowance</u>.</p> <p>Dfl comment that there should be the presumption against development of green field sites within a defended area.</p>	<p>defined as the extent of a flood event within a 1 in 100 year probability (or 1% annual <i>exceedance</i> probability (<i>AEP</i>)) of exceeding the peak floodwater level." (Ref: MC56B Minor Changes Schedule) *See also consideration of Dfl comment below</p> <p>The Council notes the comment. The J&amp;A to this policy references Flood Maps NI and its website address. The Council proposes for clarity, as a minor change, to amend paragraph 2 of Policy FLD1, page 110, under subheading Exceptions in Defended Areas, as follows: "On previously developed land protected by flood defences (<del>confirmed by Dfl Rivers as shown on Dfl Flood Maps NI</del>) that are structurally adequate and provide a minimum standard of 1 in 100 year fluvial flood protection." (Ref: MC56C Minor Changes Schedule)</p> <p>The Council notes the comment however in accordance with the SPPS this policy deals with development in fluvial floodplains, not its margins. Moving the text as suggested does not accord with the strategic objectives of the SPPS paragraph 6.104. The J&amp;A to Policy FLD1 clearly directs the reader to refer to flood maps NI and it is not appropriate to suggest in policy that areas beyond the margins of a flood plain will require completion of an FRA.</p> <p>The Council notes the comment. The text as currently shown does refer to climate change. The Council proposes for clarity, as a minor change, to amend paragraph 2 of the J&amp;A, page 111, as follows: "For planning purposes a fluvial flood plain is defined as the extent of a 1 in 100 year flood event (or 1% annual <i>exceedance</i> probability (<i>AEP</i>)) exceeding the peak floodwater level, <i>taking into account climate change allowance as represented on Dfl Flood Maps NI.</i>" (Ref: MC56D Minor Changes Schedule)</p> <p>The Council notes the comment however policy FLD1 is clear that new development will not be permitted within a fluvial flood plain unless it is by exception on previously developed land and that a flood risk assessment demonstrates its</p>
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	acceptability. Therefore the suggested wording is not considered necessary.
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## Operational Policy FLD2 Protection of Flood Defence and Drainage Infrastructure

There was one representation received in respect of Operational Policy FLD2 Protection of Flood Defence and Drainage Infrastructure.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Dfi note that the proposed policy aligns closely with existing Policy FLD 2 of Revised Planning Policy Statement 15 "Planning and Flood Risk" and the Flood Risk section of the Strategic Planning Policy Statement for Northern Ireland.	The Council welcomes the supportive comment.

## Operational Policy FLD3 Development and Surface Water (Pluvial) Flood Risk Outside Flood Plains

There was one representation received in respect of Operational Policy FLD3 Development and Surface Water (Pluvial) Flood Risk Outside Flood Plains.

### Respondents Received

Reference Number	Respondent
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>Dfi welcome that FLD3 states that consideration should be given to the use of sustainable drainage systems as the preferred drainage solution.</p> <p>Dfi note the proposed policy generally aligns with existing Policy FLD 3 of Revised Planning Policy Statement 15 "Planning and Flood Risk" and the Flood Risk section of the Strategic Planning Policy Statement for Northern Ireland. Additional clarity could have been provided by including that when a DA is not required <u>but there is potential for surface water flooding as shown on the surface water layer of Flood Maps NI</u> it remains the responsibility ...</p>	<p>The Council is content that there is agreement on this inclusion and welcomes the supportive comment.</p> <p>The Council notes the comment and agrees this would be beneficial. The Council proposes for clarity, as a minor change, to amend paragraph 3 of Policy FLD3, page 114, as follows:  <i>"If a DA is not required, but there is potential for surface water flooding as shown on the surface water layout of Dfi Flood Maps NI, it remains the responsibility of the developer to mitigate the effects of flooding and drainage as a result of the development."</i>            (Ref: MC57 Minor Changes Schedule)</p>

## Operational Policy FLD4 Artificial Modification of Watercourses

There was one representation received in respect of Operational Policy FLD4 Artificial Modification of Watercourses.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
Dfi note the proposed policy aligns closely with existing Policy FLD4 of Revised Planning Policy Statement 15 "Planning and Flood Risk" and the Flood Risk section of the Strategic Planning Policy Statement for Northern Ireland.	The Council welcomes the supportive comment.

## Operational Policy FLD5 Development in Proximity to Reservoirs

There was one representation received in respect of Operational Policy FLD5 Development in Proximity to Reservoirs.

### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (Dfi)

### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>Dfi note that while the proposed policy aligns closely with existing Policy FLD5 of Revised Planning Policy Statement 15 "Planning and Flood Risk" and the Flood Risk section of the Strategic Planning Policy Statement for Northern Ireland, it does not reflect current thinking by the Department for Infrastructure as advised to all Council Heads of Planning on 6th June 2019. In that the following wording may be useful to include in the LDP policy sections:</p> <p><i>New development will only be permitted within the potential flood inundation area of a "controlled reservoir", as shown on the Strategic Flood Maps, if:</i></p> <p><i>the applicant can demonstrate the condition, management and maintenance regime of the reservoir is appropriate to provide sufficient assurance regarding reservoir safety, so as to enable the development to proceed; or</i></p> <p><i>where assurance on the condition, management and maintenance regime of the relevant reservoir/s is not demonstrated, the application is accompanied by a Flood Risk Assessment, or other analysis, which assesses the downstream flood risk in the event of an uncontrolled release of water due to reservoir failure as being acceptable to enable the development to proceed.</i></p> <p><i>There will be a presumption against development within the potential flood inundation area of a controlled reservoir for proposals that include:</i></p> <ul style="list-style-type: none"> <li>• <i>essential infrastructure;</i></li> <li>• <i>storage of hazardous substances; and</i></li> <li>• <i>bespoke accommodation for vulnerable groups.</i></li> </ul>	<p>The Council notes the suggested rewording of Policy FLD5, and the slight variation to what the policy already contains. The Council proposes for clarity, as a focussed change, to amend Policy FLD5, page 116, in accordance with the advice issued in June 2019 by Dfi Rivers as follows:</p> <p>"New development will only be permitted within the potential flood inundation area of a "controlled reservoir" as shown on the Strategic Flood Maps, if:</p> <p>a) <del>it can be demonstrated the applicant can demonstrate</del> that the condition, management and maintenance regime of the reservoir <del>is appropriate to</del> provides sufficient assurance regarding <del>its reservoir</del> safety, <del>so as</del> to enable the development to proceed; or</p> <p>b) <del>where assurance on the condition, management and maintenance regime of the relevant reservoir(s) is not demonstrated,</del> the application is accompanied by a Flood Risk Assessment, <del>or other analysis,</del> which <del>demonstrates: 1 an assessment of the downstream flood risk in the event of: a controlled release of water; an uncontrolled release of water due to reservoir failure; a change in flow paths as a result of the proposed development, and 2. That there are suitable measures to manage and mitigate the identified flood risk including details of emergency evacuation procedures</del> assesses the downstream flood risk in the event of an uncontrolled release of water due to reservoir failure as being acceptable to enable the development to proceed.</p> <p><del>Replacement buildings within the potential flood inundation area downstream of a</del></p>



*Replacement Building(s): Where assurance on the condition, management and maintenance regime of the relevant reservoir/s is not demonstrated, planning approval will be granted for the replacement of an existing building(s) within a potential flood inundation area of a controlled reservoir provided demonstrated that there is no material increase in the flood risk to the development or elsewhere.*

~~*controlled reservoir must be accompanied by a Flood Risk Assessment.*~~

~~*Planning permission will be granted provided it is demonstrated that there is no material increase in the flood risk to the development or elsewhere.*~~

~~*With all development proposals*~~ There will be a presumption against development within the potential flood inundation area for proposals that include:

- essential infrastructure;
- storage of hazardous substances; and
- bespoke accommodation for vulnerable groups. ~~*and for any development located in areas where the Flood Risk Assessment indicates potential for an unacceptable combination of depth and velocity (See Policy FLD1)*~~

~~*Replacement Building(s):- Where assurance on the condition, management and maintenance regime of the relevant reservoir/s is not demonstrated, planning approval will be granted for the replacement of an existing building(s) within the potential flood inundation area of a controlled reservoir provided it is demonstrated that there is no material increase in the flood risk to the proposed development or elsewhere."*~~

~~*(Ref: FC15 Focussed Changes Schedule)*~~

## 17. ADVERTISING

### Operational Policy AD1 Amenity and Public Safety

There was one representation received in respect of Operational Policy AD1 Amenity and Public Safety.

#### Respondents

Reference Number	Respondent
DPS-109	Department for Infrastructure (DfI)

#### Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
DfI comment that LCCC should review the wording of sub-bullet point 3. to say 'could reduce the effectiveness of traffic lights or traffic signs, or .....'.	The Council proposes for clarity, as a minor change, to amend the J&A of Policy AD1, Point 3, page 118, as follows: "3. which because of their size or brightness, could reduce the effectiveness of traffic lights/ <i>signs</i> , or result in glare or dazzle, or otherwise distract road users especially in wet or misty weather." (Ref: <a href="#">MC58A Minor Changes Schedule</a> )

\*Supplementary; see also Ref: MC58B of Minor Changes Schedule. It became apparent, through a representation from Historic Environment Division (DPS-030) in relation to policy HE11 – The Control of Advertisements in a Conservation Area or Area of Townscape Character/Area of Village Character, that the heading to the final paragraph of the J&A on page 118 was incomplete in its title. Consequently the Council proposes for clarity, as a minor change, to amend the heading of the final paragraph of the J&A as follows:  
'Listed Buildings, Conservation Areas and Areas of Townscape/*Village* Character'  
The first sentence of the paragraph should then read:  
'Policies and guidance for the control of advertisements affecting Listed Buildings, Conservation Areas and *Areas of Townscape/ Village Character* are set out in Operational Policies HE7 and HE11.'

## Glossary Part 2

There were three comments raised in respect of the Glossary in Part 2.

### Respondents

Reference Number	Respondent
DPS-012	Northern Ireland Housing Executive (NIHE)
DPS-030	Department for Communities (DfC) Historic Environment Division (HED)
DPS-081	Fleming Mounstephen Planning on behalf of Henderson Group

### Council Consideration of Issues Raised

Main Issue	Council Consideration
<p>NIHE would like to see in Part 2 that Affordable Housing is defined in accordance with the SPPS, rather than a shortened version and would like to see reference made to the ongoing consultation by DfC on the revised definition which may change.</p> <p>NIHE welcomes the inclusion of Lifetime Homes within the glossary of Part 2, however, they would also like to see Specialised Housing included.</p>	<p>The Council notes the comment and will continue to liaise with statutory partners including the Department for Communities and NIHE in the definition of Affordable Housing and Specialised Housing.</p> <p>For the purposes of the dPS, ‘affordable housing’ relates to social rented housing and intermediate housing as identified on page 114 of the SPPS.</p> <p>This is now included within Policy HOU11.</p>
<p>HED recommends including definition for a ‘Heritage Asset’ as follows: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.</p> <p>HED also recommends amending the following definitions as below:</p> <p>Listed Building: A listed building is a structure which the Department for Communities has included in a statutory list of buildings of special architectural and/or historic Interest.</p> <p>Historic Park, Garden or Demesne of Special Historic Interest:</p>	<p>The Council proposes for clarity, as a minor change, to include the definition of Heritage Asset in the glossary of Part 2, page 120, as follows: <i>“Heritage Asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.”</i></p> <p>The Council notes the suggested amendments. The Council proposes for clarity, as a minor change, to amend the definitions recommended by HED as follows;</p> <p>Page 121, Listed Building: <i>“A listed building is a structure which the Department for Communities has included in a statutory list of buildings of special architectural and/or historic Interest.”</i></p> <p>Page 120, Historic Park, Garden or Demesne of Special Historic Interest:</p>

<p>An identified site of international or regional importance within Northern Ireland, included in the Register of Parks, Gardens and Demesnes of special historic interest, maintained by the Department for Communities.</p> <p>Design and Access Statement: A Design and Access Statement [D&amp;AS] is a single document that explains the design thinking behind a planning application. It provides a framework for applicants to explain and to justify how a proposed development is a suitable response to the site and its setting.</p> <p>Scheduled Monuments Statutory designations of archaeological sites or other heritage assets of national importance protecting them from damage or disturbance.</p>	<p><i>“An identified site of international or regional importance within Northern Ireland, included in the Register of Parks, Gardens and Demesnes of special historic interest, maintained by the Department for Communities.”</i></p> <p>Page 120, Design and Access Statement: <i>“A Design and Access Statement [D&amp;AS] is a single document that explains the design thinking behind a planning application. It provides a framework for applicants to explain and to justify how a proposed development is a suitable response to the site and its setting.”</i></p> <p>Page 121, Scheduled Monuments: <i>“Statutory designations of archaeological sites or other heritage assets of national importance protecting them from damage or disturbance.”</i> (Ref: MC59 Minor Changes Schedule)</p>
<p>Fleming Mounstephen Planning notes the definition of a Local Centre in the Glossary of Part 2, as small groups of shops and offices providing commerce and community services to a local population. It is unclear based on the Council’s own definition, how only Dundonald is identified as a Local Centre.</p>	<p>This comment is referring to the wider Retail Hierarchy which is discussed in Part 1 of the draft Plan Strategy (see page 97 dPS Part 1). The Local Centre at Dundonald is an existing designation from BMAP. Local Centres will be reviewed at the Local Policies Plan Stage.</p>

## 8.0 Summary and Analysis of Representations to Supporting Documents

### Draft Sustainability Appraisal Report

There were two individual representations received in relation to the Draft Sustainability Appraisal (SA) Report (DPS-030 and DPS-058). A further eight representations included comments on the Draft Sustainability Appraisal within the main body of their representation to the draft Plan Strategy, also detailed in the table below.

### Respondents

Reference Number	Respondent
DPS-013	Antrim and Newtownabbey Borough Council
DPS-025	Quarry Plan Ltd, on behalf of an Individual
DPS-030	Department for Communities, Historic Environment Division (HED)
DPS-032	Turley on behalf of Northern Ireland Housing Association Federation (NIFHA)
DPS-041	Belfast City Council
DPS-048	Turley on behalf of Clanmil Housing Association
DPS-058	Department of Agriculture, Environment and Rural Affairs, Strategic Environmental Assessment Team (DAERA SEA Team)
DPS-063	Individual
DPS-084	Ards and North Down Borough Council
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)

### Council and Shared Environmental Services (SES) Consideration of Issues Raised

Main Issue(s) Raised	Council and SES Consideration
Antrim and Newtownabbey Borough Council comment that the potential impact on neighbouring councils of future development at the Maze was not considered within the SA.	<p>The draft Plan Strategy SA Report has stated (in Appendix 5) that owing to the fact that the Maze lands has its own specific designation as a Strategic Land Reserve of Regional Importance, it does not fall under an employment land designation which refers to B Class uses. Therefore the site cannot be assessed under this use or any other 'presumed' use (for example, should a future use of the site consist of a non-employment use, such as Tourism or Sports). Consequently, no site-specific policy appraisal has been presented in the dPS SA for this land.</p> <p>An appraisal of the potential effects of retaining the Maze lands as a Strategic Land Reserve of Regional Importance, took place at the POP stage (Option 8). This is presented in the POP SA Interim Report and is accompanied by appraisals of existing employment land, Major Employment Zonings/Mixed Use Sites and Economic Development in the Countryside (Options 5, 6, 7 and 9).</p>

	<p>The POP SA Interim Report recognised that the future use of the site was unknown and this was reflected in the scoring. Whilst it considered the site to have potential to enable sustainable economic growth, the nature of the likely development and its impact across many of the sustainability objectives are uncertain. This is reflected in the identification of Preferred Options and subsequent policy development in the dPS.</p> <p>Should further information on the development of the Maze lands become available, the Council, at Local Policies Plan stage, will detail a site specific policy with key site requirements detailing the range of uses applicable to the site. These would be subject to a Sustainability Appraisal at that time. No change is therefore required to the dPS SA.</p>
<p>Quarryplan Ltd on behalf of an Individual comments that the SA does not appear to have considered alternatives which would see the delivery of housing in close proximity to existing employment allocations in the shorter and medium term as an alternative to the longer term strategic option at Blaris.</p>	<p>Alternatives to strategic policy for housing in settlements were appraised in the POP SA Interim Report, (POP Option 2). The POP Preferred Option and subsequent policy brought forward in the dPS has been developed in the context of the housing baseline in the district, including the future household projections and level of existing housing commitments. The housing allocation has been appraised at the strategic scale for the draft Plan Strategy, using the RDS Evaluation Framework and SPPS and was found to be sustainable. This is a proportionate approach for this stage of the Plan. The consideration and appraisal of specific sites zoned for housing (or other land uses) will take place through the SA for the Local Policies Plan. No change is therefore required to the dPS SA.</p>
<p>HED are of the opinion that the scoring outcome for SP08 – Housing in Settlements is too positive as <i>‘new housing can have a detrimental impact in relation to occupation of older properties and inappropriately sited new housing can affect the historic character of a settlement’</i>.</p>	<p>The full appraisal matrix for SP08 in Appendix 4 of the SA Report includes comments for Sustainability Objective 14 reflecting the strategic policy requirement that development design must respect the surrounding context, which includes archaeological features and heritage. It also affirms that respecting context and densities will help to support townscape and settings. The need to respect surrounding context is also acknowledged in the comments of Objective 13, Landscape Character. The strategic policy appraisal comments signpost the operational policy, with confidence that these will add certainty to the protection of features and assets. These comments support the positive score and no change is therefore required to the dPS SA.</p>

<p>HED comment that the scoring for SP09 Housing in the Countryside – is too positive, giving recognition to the fact there can be impacts on landscape character and confirmation in evidence of a large number of replacement dwelling approvals.</p>	<p>In the full appraisal matrix for SP09 in Appendix 4 of the SA Report, the comments for Sustainability Objectives 13 and 14 (Landscape Character and Historic Environment) recognise that rural character can be incrementally eroded by dispersed development in the countryside. The strategic policy appraisal comments signpost the operational policies (for landscape and historic environment, in addition to those for housing in the countryside) which align with those provisions in the SPPS and there is confidence that operational policy will reduce the risk of negative or uncertain effects. The score has been influenced by the policy inclusions encouraging the retention and renovation/refurbishment of existing buildings [including Irish vernacular] in preference to replacement and the reduction in scope for gap/infill/clustering development. These comments support the positive score and no change is therefore required to the dPS SA.</p>
<p>HED agrees with the scoring of SP18 – Protecting and Enhancing the Historic and Archaeological Remains.</p>	<p>The Council and SES notes and welcomes the supportive comment.</p>
<p>HED comment that in relation to SP21- Renewable Energy, an ‘Uncertain’ scoring on the Historic Environment Sustainability Objective may be more appropriate, to take account of impact of underground construction works.</p>	<p>In the full appraisal matrix for SP21 in Appendix 4 of the SA Report, the comments under Sustainability Objective 14 have acknowledged that construction activities may conflict with the preservation of the historic environment. While an uncertain score could also be justified with the comments recorded, it was considered in the appraisal that relevant operational policies would provide adequate safeguarding against negative impacts and a neutral score was awarded. No change is therefore required to the dPS SA. That being said, the Council considers that Strategic Policy SP21 would benefit from the inclusion of the natural and historic and environment under criteria b). The Council proposes for clarity, as a minor change, to amend Strategic Policy SP21, Part 1, page 146, as follows:  “b) minimise any potential visual intrusion and environmental impacts to protect both the rural and urban landscape, <i>and natural and historic environment.</i>”  <a href="#">(Ref: MC60 Minor Changes Schedule)</a></p>
<p>HED comment that in relation to SP22- Telecommunications &amp; other Utilities, an ‘Uncertain’ scoring on the Historic Environment Sustainability Objective more appropriate due to impacts of underground construction works.</p>	<p>In the full appraisal matrix for SP22 in Appendix 4 of the SA Report, the comments under Sustainability Objective 14 have acknowledged that construction activities may damage or disturb the historic environment. The appraisal comments acknowledge that short-term effects [on setting]</p>

	<p>may occur from the presence and operation of construction equipment. It is accepted that damage/destruction of buried archaeology would be a permanent impact and that this has not been reflected in the SA comments. While an uncertain score could also be justified with the comments recorded, the rationale for the 'negligible' score is supported by the appraisal's recognition of SP22's strategic aim of delivering sustainable telecommunications and minimising environmental impacts, with relevant operational policies providing adequate safeguarding against negative effects. No change is required to the dPS SA.</p> <p>That being said, the Council considers that Strategic Policy SP22 would benefit from the inclusion of the natural and historic and environment under criteria b). The Council proposes for clarity, as a minor change, to amend Strategic Policy SP22, Part 1, page 149, as follows: "b) minimise any potential visual intrusion and environmental impacts to protect both the rural and urban landscape, <i>and natural and historic environment.</i>"</p> <p><a href="#">(Ref: MC61 Minor Changes Schedule)</a></p>
<p>HED in relation to SP24, welcomes the recognition in scoring that many heritage assets are located in the flood plain.</p>	<p>The Council and SES notes and welcomes the comment.</p>
<p>HED consider that the scoring for SMU01 – West Lisburn / Blaris, should be 'uncertain' in relation to the historic environment. The consideration of mitigation here should articulate the potential for key site requirements around archaeological remains so that their character and the impacts of development can be assessed.</p>	<p>In the full appraisal matrix for SMU01 in Appendix 4 of the SA Report, the comments under Sustainability Objective 14 have acknowledged that construction activities may result in damage to or loss of buried archaeology. Key sites requirements are included under Strategic Policy SMU01 which outline the range of acceptable uses on the site. However the Preamble on page 3 of Part 2 of the Plan Strategy states that the determination of planning applications must be in accordance with the provisions of both the Plan Strategy and all operational policies where relevant to the development. There is confidence that operational policy will reduce the risk of negative or uncertain effects. No change is required to the dPS SA.</p>
<p>HED comment that in relation to SMU02 – Purdysburn /Knockbracken MEL, a positive outcome could be better ascertained if there were clear cross references to Policy HE5 in relation to Historic Parks, Gardens &amp; Demesnes.</p>	<p>Key site requirements are included under Strategic Policy SMU02 which outline the range of acceptable uses on the site. However the Preamble on page 3 of Part 2 of the Plan Strategy states that the determination of planning applications must be in accordance with the provisions of both the Plan Strategy and all operational policies where relevant to the development. There is confidence that operational</p>



	policy will provide a positive outcome in relation to this issue. No change is required to the dPS SA.
HED in relation to COU 1, COU2, COU3, COU4, COU6, COU7, COU8, COU9, COU10, comments that statistics stated in the Countryside Assessment suggest replacement dwellings form a high proportion of development in the countryside and this should be cross referenced into the SA. These figures would imply an impact in relation to historic structures, almost certainly including non-designated heritage assets which are being removed and also an impact on landscape character.	Historic figures for new or replacement dwellings in the countryside have been acknowledged in Section 5.7 of the SA Scoping Report, Physical Resources. Section 5.13 of the SA Scoping Report has recognised that there has been an increasing trend for rural housing and this has been recognised as a Key Sustainability Issue (KSI) for Landscape Character. Section 5.14 of the Scoping Report has also included the ongoing loss of certain non-designated heritage assets such as historic farmsteads and buildings in the countryside as a KSI. The SA has taken account of the baseline for rural development when appraising the draft policies. The Council's operational policies align with the SPPS provisions and provide greater restrictions for infill dwellings and dwellings in clusters.
HED in relation to COU11, COU12, COU13, COU14, notes that minor positive impacts are identified in respect of maintaining landscape character and protecting and conserving the historic environment in relation to the conversion and re-use of buildings for non-residential use. Potential positive impacts may be achieved upon the identification of vernacular buildings and buildings of local importance and appropriate application of the relevant policies.	The SA has acknowledged the benefits of reusing buildings and identifying/safeguarding non-designated buildings that are locally important. The submission relates to suggested streamlining of policy for applications affecting non-designated heritage assets, such as local listing. This is a matter which will require further consideration at the Local Policies Plan stage. No change is required to the dPS SA.
HED comment that the wording of HE1 needs reworded to <i>improve certainty of positive outcome</i> . HED considers policy amplification text in relation to scheduled monument consent is misleading and creates an inference that scheduled monument consent will most likely be granted following discussion, which may not be the case. Wording may lead to confusion and potentially negative outcomes for remains of regional importance and their settings, where development that affects them should only be permitted in exceptional circumstances. They advise that should the wording of the policy be removed as per the HED comments on the dPS, then the outcome should be positive.	Please see Council comments in relation to HE1 for draft Plan Strategy which deals with this issue through a proposed minor change. No change is required to the dPS SA.
HED comment that in relation to TRA8, measures to reduce negative effects and promote positive effects should include cross	The SA has acknowledged that positive effects could be enhanced by cross-over to other relevant policies. No change is required to the dPS SA.

<p>over with historic environment policies as well as those other policy suites named.</p>	
<p>HED considers it appropriate to articulate some of the statistical evidence derived from other reports such as the Countryside Assessment in relation to replacement dwellings in the SA, page 39 in relation to rural dwellings.</p>	<p>Historic figures for new or replacement dwellings in the countryside have been included on page 72 (Section 5.7, Physical Resources) of the SA Scoping Report and have informed the appraisal. Consideration will be given to including a cross-reference to the Countryside Assessment in future versions of the SA Scoping Report however all supporting documents to the dPS should not be read in isolation. No change is required to the dPS SA.</p>
<p>HED in relation to the Key Sustainability Issues (Economy &amp; Employment), in particular the last KSI bullet point, comment that with regard to tourism assets, it is important that new initiatives to develop their potential further are led by the significance of the asset so that development is sustainable and integrity is protected and enhanced. They consider this a key issue in itself.</p>	<p>HED comments are noted and in future if considered appropriate an additional KSI may be included in future versions of the SA Scoping Report or as part of the Local Policies Plan where specific assets may be identified. No change is required to the dPS SA.</p>
<p>HED welcome that Lisburn City is mentioned as a cradle of the Irish Linen Industry (page 120 of the SA), however disappointed this particular aspect of the Council area's heritage, which has associated impacts on landscape did not receive a fuller consideration in the Countryside Assessment.</p>	<p>The Council and SES notes the comment. It is suggested that this issue will receive full consideration at the Local Policies Plan stage. No change is required to the dPS SA.</p>
<p>HED comment that on page 122 the heading should read <u>Areas of Significant Archaeological Interest</u> (not Special) and <u>Areas of Archaeological Potential</u>. It would be prudent to consider BCC's Giant's Ring within this evidence and in the map 5.14.1 as policy applications should take this into account in decision making.</p> <p>HED welcomes the articulation that further AAP will be identified moving forward to local policies stage. The last sentence of the final paragraph on this page incorrectly implies that AAP are designated in plans. This should be amended to read:-</p> <p>'The new LDP will consider the designation of new ASAI and <u>the identification</u> of AAP through consultation with DfC HED.</p>	<p>The errors in terminology for ASAI and the identification of AAP are noted and will be corrected in future revisions of the SA Scoping Report for the Local Policies Plan but are not considered fundamental to the meaning or understanding of the SA as written. The designation of both ASAI(s) and AAPs will be further addressed at the LPP stage, and in relation to neighbouring Council districts (the Giant's Ring which is located in Belfast City Council area) will refer to these where there is potential for cross-boundary effects. No change is required to the dPS SA.</p>
<p>HED comment that in relation to page 123, Defence Heritage, the last sentence of this paragraph should be amended to reflect that the Maze contains designated heritage assets of both regional and local importance (e.g. the former airfield at the Maze contains scheduled</p>	<p>Future revisions of the SA Scoping Report for the Local Policies Plan will consider the inclusion of additional detail under the Defence Heritage sub-heading. No change is required to the dPS SA.</p>

<p>monuments &amp; listed buildings as well as other locally important heritage assets).</p>	
<p>In relation to paragraph 5.14.3 'Likely evolution of the Baseline without the LDP', HED comment that further to their previous comments on ASAI and AAP, the second paragraph of text in this section contains similar inconsistencies to those noted on page 122. Suggest removing the reference to these in this paragraph as the issue is highlighted correctly in the third paragraph.</p>	<p>The errors in terminology for designating ASAI/identifying AAP will be corrected in future revisions of the SA Scoping Report for the Local Policies Plan but are not considered fundamental to the meaning or understanding of the SA as written. No change is required to the dPS SA.</p>
<p>HED advise that in relation to 5.14.4 'Key Sustainability Issues for the Historic &amp; Cultural Heritage' given the statistics outlined in the Countryside Assessment, an additional key issue for the historic environment might be the impact of replacement dwellings through the removal of non-designated historic structures.</p>	<p>HED comments are noted and in future, if considered appropriate, an additional KSI may be included in future versions of the SA Scoping Report for the Local Policies Plan. No change is required to the dPS SA.</p>
<p>Turley on behalf of NIFHA comment that in relation to Affordable Housing, the SA does not consider any alternatives for the provision of affordable housing. No alternative thresholds or requirements have been considered and as such is flawed.</p>	<p>Please see Council comments in relation to HOU10 for draft Plan Strategy which deals with this issue. The dPS SA has reported that there is no reasonable alternative, as the policy option is consistent with regional policy, SPPS paragraph 6.143. The dPS SA has also indicated that, as a statutory consultee for the LDP, the NIHE has stated that zoning (on its own) is not acceptable and therefore a policy led approach is in accordance with the promotion of achieving mixed tenure housing. Further detail on the issue of affordable housing is provided in the Housing and Employment Topic Paper, January 2021.</p>
<p>Belfast City Council note that Blaris/West Lisburn generally score as 'positive/very positive' across all objectives other than landscape character. The policy direction for Blaris / West Lisburn would appear to stem from the West Lisburn Development Framework Review 2018 (draft) which is not a statutory document and has therefore not been subject to any SA process.</p>	<p>The dPS SA has examined SMU01 and Sustainability Appraisal at the dPS strategic stage and considers the Strategic Mixed Use site, benefits from its location which is accessible to the strategic road, rail and greenway network (both existing and proposed) and is to be delivered through an accompanying masterplan, providing a sustainable location and approach to future development. The Masterplan to be provided for the site will provide additional detailed assessments with further assessment carried out at the Local Policies Plan as required. No change is required to the dPS SA.</p>
<p>Turley on behalf of Clanmil Housing Association note that, in relation to Affordable Housing, the SA does not consider any alternatives for the provision of affordable housing. No alternative thresholds have been considered and as such the SA is flawed.</p>	<p>The dPS SA has reported that there is no reasonable alternative, as the policy option is consistent with regional policy. The SPPS paragraph 6.143 clearly states that it is NIHE through its HNA/HNA which will identify the range of specific housing needs and therefore the dPS responsibility</p>

	<p>is to provide the policy context to deliver those identified needs. Therefore the threshold provided in the dPS policy is a sustainable approach to meeting any need identified by the HNA/HMA and is sound. The dPS SA has also indicated that, as a statutory consultee for the LDP, the NIHE has stated that zoning (on its own) is not acceptable and therefore a policy led approach is in accordance with the promotion of achieving mixed tenure housing.</p> <p>Further detail on the issue of affordable housing is provided in the Housing and Employment Topic Paper, January 2021.</p>
<p>DAERA SEA Team comment that Policy SP08 – Housing in Settlements, has scored a positive effect with regards to sustainability objective 12 biodiversity and natural resources. However they note there is a lack of WwTW capacity in a number of settlements and the Water Framework Directive objectives for waterbodies in the plan area are currently not being met. There is no mention within the SA how this will be dealt with in relation to this policy. Any increase in housing will have a negative effect on biodiversity and natural resources.</p> <p>The policy may require a negative scoring against sustainability objective 12 and appropriate measures included to reduce negative effects.</p>	<p>The SA Scoping Report has recognised in section 5.11.2 that none of the waterbodies in the district are meeting WFD objectives ('good' ecological status) and appraisals were conducted in this context. The appraisal scores reflect the strategic policy to focus development in settlements that are best able to accommodate it and encourage a compact urban form in preference to dispersed development. The Council's growth strategy for housing aligns with the revised Housing Growth Indicators (HGIs) and is therefore consistent with regional policy direction. Any proposals will be considered, with appropriate statutory consultation to ensure that adequate treatment capacity is available before new housing development is permitted. Site-specific issues will be examined in more detail at the LPP.</p> <p>At the time the SA was undertaken, constrained WwTW capacity was indicated by NI Water for Moneyreagh WwTW only.</p> <p>It is also currently indicated as being scheduled for upgrading in NI Water's PC15 capital works programme.</p> <p>NI Water has reported that wastewater network capacity issues are emerging due to sewer network modelling activities being undertaken in Lisburn, Moneyreagh, Annahilt, Dromara, Ravernet, Glenavy and Newtownbreda. However, no details of the results of the sewer network modelling exercise have been provided to either the SA or LDP teams by NI Water.</p> <p>No change is required to the dPS SA.</p>
<p>DAERA SEA Team, in relation to HOU1 – New Residential Development, comment that similar to SP08, this policy has also scored a positive</p>	<p>The SA Scoping Report has recognised in section 5.11.2 that none of the waterbodies in the district are meeting WFD objectives ('good' ecological</p>

<p>effect with regard to objective 12 biodiversity &amp; natural resources.</p> <p>The policy may need a negative scoring against sustainability objective 12 and appropriate measure included to reduce negative effects due to lack of WwTW capacity within the Council area.</p>	<p>status) and appraisals were conducted in this context. The appraisal scores reflect the strategic policy to focus development in settlements that are best able to accommodate it and encourage a compact urban form in preference to dispersed development. The Council’s growth strategy for housing aligns with the revised Housing Growth Indicators (HGIs) and is therefore consistent with regional policy direction. Any proposals will be considered, with appropriate statutory consultation to ensure that adequate treatment capacity is available before new housing development is permitted. Site-specific issues will be examined in more detail at the LPP.</p> <p>At the time the SA was undertaken, constrained WwTW capacity was indicated by NI Water for Moneyreagh WwTW only.</p> <p>It is also currently indicated as being scheduled for upgrading in NI Water’s PC15 capital works programme.</p> <p>NI Water has reported that wastewater network capacity issues are emerging due to sewer network modelling activities being undertaken in Lisburn, Moneyreagh, Annahilt, Dromara, Ravernet, Glenavy and Newtownbreda. However, no details of the results of the sewer network modelling exercise have been provided to either the SA or LDP teams by NI Water.</p> <p>No change is required to the dPS SA.</p>
<p>DAERA SEA Team note that SMU01 – West Lisburn/Blaris has scored a significant positive effect against sustainability objective 12. DAERA welcome the inclusion of a linear riverside park and other open space and public realm works including green and blue infrastructure. However, a development of this size and scale may have an adverse effect on the natural environment with the loss of undeveloped greenfield land and biodiversity unless measures are included within the Masterplan to retain natural features.</p> <p>The policy may require a negative scoring against sustainability objective 12.</p>	<p>SMU01 West Lisburn/Blaris is existing zoned land within the existing Settlement Development Limits and therefore the principle of development already exists. The change therefore relates to its designation as a strategic mixed use site, as opposed to being for employment only. The awarded score is supported through the comments explaining that the areas to be developed are currently mostly agriculture / improved pasture with reduced biodiversity and that measures to retain and enhance biodiversity will be included in the remaining parts of the site. The Masterplan to be provided for the site will provide additional detail.</p> <p>No change is required to the dPS SA.</p>
<p>DAERA SEA Team note that SMU02 – Purdysburn / Knockbracken, has scored a positive effect against sustainability objective 12. The size and scale of the development may</p>	<p>SMU02 Purdysburn/Knockbracken is existing zoned land within the existing Settlement Development Limits and therefore the principle of development already exists. The awarded score is supported</p>

<p>lead to a loss of biodiversity unless measures are included within the Concept Masterplan to retain natural features on the site. The SA has noted the plan will allow for wooded areas and parkland to be retained and biodiversity surveys and map resources will help to inform the Masterplan.</p> <p>The policy may require an uncertain scoring against sustainability objective 12 until the Concept Masterplan has been finalised.</p>	<p>through the recognition that the zoning has taken account of biodiversity and the strategic policy refers to a comprehensive landscaping scheme to take account of the existing parkland character and SLNCI. The Masterplan to be provided for the site will provide additional detail.</p> <p>No change is required to the dPS SA.</p>
<p>DAERA SEA Team note that SP13 – Minerals, has scored positively against sustainability objective 12. The SA acknowledges the risk to the natural environment from mineral extraction and notes a regional approach will respect the natural environment unless in exceptional circumstances. DAREA is concerned that the wording of the policy suggests any part of the natural environment including designated sites could be at risk from mineral development in ‘exceptional circumstances’ which conflicts with the Habitats Regs.</p> <p>The policy may require a negative scoring against sustainability 12 and appropriate measures included to reduce negative effects.</p>	<p>The dPS scores positively against sustainability objective 12 in that part a) of Policy SP13 recognises the importance of balancing mineral development against the need to safeguard the environment.</p> <p>The mineral development operational policies in part two of the dPS further highlight the protection of the environment as a significant material consideration.</p> <p>The council proposes to amend the J&amp;A of MD1 to take full account of environmental regulations as follows “The Council, having regard to Environmental Impact Assessment (EIA), Habitats Regulations Assessment (HRA) and the Wildlife and Natural Environment Act (NI) 2011 (WANE), where necessary, will balance the case for a particular mineral working proposal against the need to protect and conserve the environment.</p> <p>No change is required to the dPS SA.</p>
<p>DAERA SEA Team comment that it may be better to use the word ‘adaptation’ as opposed to ‘adaption’ in relation to ‘Climate Change Adaptation’.</p>	<p>The errors in terminology will be corrected in future revisions of the SA Scoping Report for the Local Policies Plan but are not considered fundamental to the meaning or understanding of the SA as written. No change is required to the dPS SA.</p>
<p>DAERA SEA Team, in relation to page 87, comment that NI National Adaptation Programme (NAP) is an incorrect term. The correct name is Northern Ireland’s Climate Change Adaptation Programme and any references to NI National Adaptation Programme should be removed.</p>	<p>The errors in terminology will be corrected in future revisions of the SA Scoping Report for the Local Policies Plan but are not considered fundamental to the meaning or understanding of the SA as written. No change is required to the dPS SA.</p>
<p>DAERA SEA Team comment that on page 88, the International context section contains information which is quite dated: there has been a more updated report issued by intergovernmental Panel on Climate Change (IPCC) called ‘The Special Report on Global Warming of 1.5°C (SR15) was published by the IPCC on 8<sup>th</sup> October 2018. The content of this</p>	<p>The omission will be corrected in future revisions of the SA Scoping Report for the Local Policies Plan but is not considered fundamental to the meaning or understanding of the SA as written. No change is required to the dPS SA.</p>

report is significant and it is recommended that it is referred to in the plan	
DAERA SEA Team suggest that the reference to 'new pests / diseases and non-natives' on page 89 should be replaced with 'new pests/diseases and invasive non-species'.	The terminology will be updated in future revisions of the SA Scoping Report for the Local Policies Plan but are not considered fundamental to the meaning or understanding of the SA as written. No change is required to the dPS SA.
DAERA SEA Team comment that the text on page 90 refers to UKCP18 but should be amended to reflect the adjacent text which is more accurate. UKCP18 projects greater chance of hotter, drier summers and warmer, wetter winters with more extreme weather and rising sea levels. The high emission scenario for Northern Ireland shows that by 2070 winters could be up to 3.9°C warmer and summers could be up to 4.9°C hotter; winters could be 25% wetter and summers 38% drier, and 2010 sea levels in Belfast could rise by 94cm.	The terminology will be updated in future revisions of the SA Scoping Report for the Local Policies Plan but are not considered fundamental to the meaning or understanding of the SA as written. No change is required to the dPS SA.
DAERA SEA Team, pages 87 and 90, comment that footnote 3 should quote year of Programme being 2014-2019.	This reference will be updated in future revisions of the SA Scoping Report for the Local Policies Plan but is not considered fundamental to the meaning or understanding of the SA as written. No change is required to the dPS SA.
DAERA SEA Team , page 93, comment that footnote 9 should be DAERA: Northern Ireland Climate Change Adaptation Programme 2014-2019	This reference will be updated in future revisions of the SA Scoping Report for the Local Policies Plan but is not considered fundamental to the meaning or understanding of the SA as written. No change is required to the dPS SA.
DAERA SEA Team comment that the tables within Appendix 4 will be required to be reviewed and updated in light of the above comments – some of these amendments required are listed, however not exclusive. Page 162 – table is required to be updated for row 'Climate Change Act 2008' to reflect zero net emissions targets. Page 162 – row on the appropriateness of a Northern Ireland Climate Change Act – December 2015 should be deleted. Page 163 – row on the Discussion Paper – Proposals for Taking Forward NI Climate Change Legislation – DoE on 1 December 2015 should be deleted. Page 198 – 'A second NI Climate Change Adaptation Programme is currently being developed to address the identified risks and is due to be published in 2019' should be replaced by 'A second NI Climate Change Adaptation Programme (NICCAP2) was	The Appendix Table demonstrating the relationship with other Plans, Policies, Programmes and Strategies will be updated in future revisions of the SA Scoping Report for the Local Policies Plan but is not considered fundamental to the meaning or understanding of the SA as written. No change is required to the dPS SA.

published in September 2019 and responds to the risks identified in this Risk Assessment'	
An Individual commented that a tailored SA and HRA is essential within the context of Feumore due to its environmentally sensitive character. Recent planning approvals are placing significant pressure on the local landscape and the individual is in full agreement with the SA. The individual would like the LDP to constrain future development in Feumore. Specific request made to modify the SDL to remove an area.	The issue referred to is a site specific matter, which will be dealt with as part of the forthcoming Local Policies Plan, in which the designation of development limits for each settlement will be applied. No change is required to the dPS SA.
Ards and North Down Borough Council comment in relation to SP14 and SMU03, It is unclear in the SA of the reasoning not to re-appraise in light of new supporting evidence which was absent from that at the time of the POP (albeit of a limited nature).	Please see Council comments in relation to SP14 Town Centres, Retailing and Other Uses and SMU03 Sprucefield Regional Shopping Centre, draft Plan Strategy, Part 1, which deals with this issue.  The Council considers that the policy presented in the dPS and related SA (page 49-50) is appropriate and justified having been assessed using an up-to-date evidence base. The rationale for the policy is provided in Technical Supplement 5 Retail Capacity Study. No change is required to the dPS SA.
An Agent commented that Sustainability has not been properly considered with adverse effects on the environment as a result.	The Council notes the comment. Please see Council comments in relation to SP08 Housing in Settlements, draft Plan Strategy, Part 1, which deals with this issue.
RSPB NI commented that the full suite of Environmental Assessments (SEA, EIA, HRA) should be used as tools to minimise environmental impacts.	The LDP is subject to SEA and HRA. The operational policies in the dPS will ensure that EIA and HRA are screened for and undertaken where required. No change is required to the dPS SA.



## Draft Habitats Regulations Assessment

There were no individual representations received in relation to the HRA Report however the representation received from DAERA, Natural Environment Division (DPS-060) in relation to the SA (mentioned above) also provided comments on the HRA. A further four representations included comments on the HRA within the main body of their representation to the draft Plan Strategy, also detailed in the table below.

### Respondents

Reference Number	Respondent
DPS-041	Belfast City Council
DPS-058	Department of Agriculture, Environment and Rural Affairs, Strategic Environmental Assessment Team (DAERA SEA Team)
DPS-060	Department of Agriculture, Environment & Rural Affairs, Northern Ireland Environment Agency (NIEA)
DPS-063	Individual
DPS-093	Royal Society for the Protection of Birds Northern Ireland (RSPB NI)

### Council and Shared Environmental Services (SES) Consideration of Issues Raised

Main Issue	Council and SES Consideration
Belfast City Council comment that the policy direction for Blaris/West Lisburn would appear to stem from the West Lisburn Development Framework Review 2018 (draft) which is not a statutory document and has therefore not been subject to any Habitat Regulations Assessment.	The dPS HRA has examined SMU01 West Lisburn/Blaris and found that there is no direct pathway from the SMU to any international site. No change is required to the dPS HRA.
In relation to the Draft Habitats Regulations Assessment October 2019 Mitigation Measures, DAERA SEA Team notes the conclusions and protective measures identified and that “assuming the recommended mitigation measures are all accepted and the plan amended accordingly, it is possible to ascertain that the Plan Strategy will have no adverse effect on the integrity of any international sites”. The ‘Mitigation Measures’, pages 21-25 of the Draft Habitats Regulations Assessment Report the recommended changes to ‘Policy’ and ‘Justification & Amplification’ are fully supported and their incorporation into the Plan prior to adoption will ensure compliance with the Conservation (Natural Habitats etc) Regulations (Northern Ireland) 1995 (as amended).	The Council and SES welcomes and notes the supportive comments. The Council proposes to incorporate the following Mitigation Measures as set out in its draft Habitats Regulations Assessment (October 2019).  The Council proposes, for clarity, as a minor change, to add an additional criterion o) to the end of Policy ED9, page 50, as follows:  <i>“o) it meets the requirements of Policy NH1”.</i> <i>(Ref: MC62 Minor Changes Schedule)</i>  The Council proposes for clarity, as a minor change, to add an additional sentence to the end of paragraph 1 of the J&A to Policy MD1, page 51, as follows:  <i>“Within the Council area there is one Special Protection Area (SPA) and Ramsar Site at Lough Neagh including the water body of Portmore Lough. All proposals that may affect a European or Ramsar site must meet the requirements of NH1.”</i>

	<p>(Ref: MC63 Minor Changes Schedule)</p> <p>The Council proposes for clarity, as a minor change, to add an additional sentence to the end of policy MD4, page 52, as follows:</p> <p><i>“All proposals that may affect a European or Ramsar site must meet the requirements of NH1.”</i> (Ref: MC64 Minor Changes Schedule)</p> <p>The Council proposes for clarity, as a minor change, to add an additional criterion k) to Policy TOU7, page 67, as follows:</p> <p><i>“k) all proposals that may affect a European or Ramsar site must meet the requirements of NH1.”</i> (Ref: MC65A Minor Changes Schedule)</p> <p>The Council proposes for clarity, as a minor change, to add a second paragraph to the J&amp;A of Policy TOU7, page 67, as follows:</p> <p><i>“Within the Council area there is one Special Protection Area (SPA) and Ramsar Site at Lough Neagh including the water body of Portmore Lough which could be adversely affected by cumulative disturbance effects. Such disturbance could arise directly from a tourism development or indirectly through increasing visitor pressures beyond the development.”</i> (Ref: MC65B Minor Changes Schedule)</p> <p>The Council proposes for clarity, as a minor change, to add an additional paragraph to the J&amp;A of policy UT1, after paragraph 5, page 104, as follows:</p> <p><i>“The potential of overhead lines to disrupt the flight paths of birds, including site selection features of Lough Neagh and Lough Beg Special Protection Area and Ramsar Site, is also a consideration.”</i> (Ref: MC66 Minor Changes Schedule)</p>
<p>In relation to SP08 – Housing in Settlements/ HOU1 to HOU12, DAERA SEA Team comment the dHRA states on page 9 that ‘it is generally considered unlikely that proposals and policies...will result in effects on the aquatic and marine environment however these will be reviewed at LPP’.</p> <p>Neither SP08 nor HOU1-HOU12 identify nor explain how lack of capacity at WwTW will be dealt with.</p>	<p>Please see response to DAERA SEA Team for SA under SP08 Housing in Settlements.</p> <p>The HRA, page 11, concluded that there are sufficient measures to ensure that development that might undermine the conservation objectives of international sites cannot proceed. Where a potential development cannot connect to the mains sewerage network, or where NI Water has indicated that consented capacity at the receiving works is limited or restricted, or there are network constraints, then a project will not be able to</p>

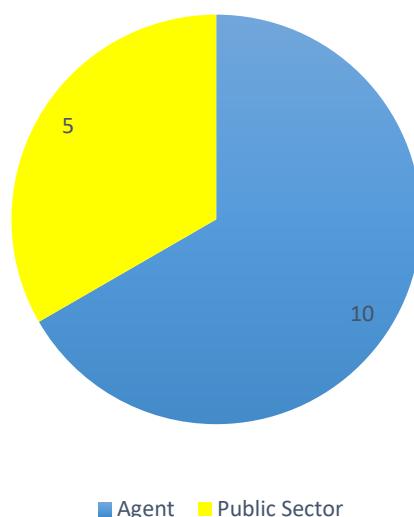
<p>The identification of further development land/housing, within settlements with hydrological linkage to European sites should acknowledge the need for adequate wastewater treatment infrastructure and treatment capability. Given that such infrastructure in the Plan area is already under pressure in certain locations in the LDP area, any further development/housing before infrastructure has been put in place or upgraded will exacerbate the difficulties in achieving the WFD Objectives.</p> <p>The Strategic Housing Allocation in Table 3, page 64 of the dPS creates a certain presumption that houses will be built within settlements where currently there may not be sufficient wastewater infrastructure capacity. The zoning of land and the timing of the release of that land for development should be aligned with the availability of suitable wastewater networks &amp; treatment infrastructure to service the developments to ensure there is adequate protection for the water environment and water dependent European sites. A general acknowledgement at Plan Strategy level of how insufficient WwTW capacity will be dealt with would ensure proofing the Plan Strategy from non-compliance with the Habitats Directive. Notwithstanding an onus on government licensing authorities to ensure a standard of discharge, DAERA SEA Team strongly advise that management of housing supply should clearly require ‘phasing of housing’ until WwTW infrastructure capacity is sufficient to meet projected discharge.</p>	<p>proceed unless it satisfies operational Policy WM2. This requires <i>‘Development relying on non mains sewage treatment will only be permitted where it is demonstrated to the Council and its statutory consultees that there is sufficient capacity to discharge effluent to a watercourse and that this will not create or add to a pollution problem.’</i></p>
<p>In relation to MD1, DAERA raises concerns that this policy with the exception being made for valuable minerals comes into conflict with the Conservation (Natural Habitats etc) Regulations (Northern Ireland) 1995. Policy should clearly state within the J&amp;A that all Mineral Development must satisfy operational policy NH1, NH2, NH3, NH4 and NH5. No mention of procedures to be implemented for the protection of the natural heritage features should valuable minerals occur within a site. Need to clarify ‘consistent with the protection of bogland valuable to nature conservation interests’. Council has a duty under WANE Act to further the conservation of biodiversity.</p>	<p>This is addressed by the HRA recommendation for MD1. The Council proposes for clarity, as a minor change, to amend the J&amp;A of Strategic Policy SP19, Part 1, page 127 and Operational Policy MD1, page 51, as follows:</p> <p><i>“Within the Council area there is one Special Protection Area (SPA) and Ramsar Site at Lough Neagh including the water body of Portmore Lough. All proposals that may affect a European or Ramsar site must meet the requirements of NH1.”</i></p> <p><i>(Ref: MC7B and MC63 Minor Changes Schedule)</i></p>

<p>In relation to MD8, DAERA comment that exceptions within this policy may come into conflict with the Habitats Regulations and question at what point does short term become long term?</p>	<p>This is addressed by the HRA recommendation for MD1, above point, which has captured this concern about potential conflict with Habitats Regulations. (Ref: MC63 Minor Changes Schedule)</p>
<p>In relation to NH1, NH2 and NH6, DAERA comment that the Habitats Regulations would take precedence over these policies. Suggested PPS2 wording should be copied verbatim and 'and' included following each requirement in exceptional circumstances to ensure clarity.</p>	<p>In commenting on the HRA NIEA did not express any concerns with NH1 or how the Habitats Regulations applies to NH2 and NH6. It is considered that the plan properly represents the requirements of the SPPS as it expresses NH1 however it is agreed that it should be clarified that all requirements in exceptional circumstances should be met by adding; 'and'.</p>
<p>An Individual commented that a tailored SA and HRA is essential within the context of Feumore due to its environmentally sensitive character</p>	<p>Feumore has been fully considered in the HRA which acknowledges that it is partly within SPA and Ramsar site at Lough Neagh. No change is required to the dPS SA.</p>
<p>RSPB NI comment that the full suite of Environmental Assessments (SEA, EIA, HRA) should be used as tools to minimise environmental impacts.</p>	<p>The LDP is subject to HRA a draft of which has been prepared in support of the dPS. The operational policies in the dPS will ensure that EIA and HRA are screened for and undertaken where required. No change is required to the dPS HRA.</p>

## 9.0 Other Matters

A number of the representations to the draft Plan Strategy made reference to the Maze lands (page 77 of the draft Plan Strategy) which the Council refers to as a Strategic Land Reserve of Regional Importance in accordance with its designation in the Regional Development Strategy 2035. There were fifteen comments raised in respect of the Maze lands.

### Maze Lands Comments by Respondent Type



### Respondents

Reference Number	Respondent
DPS-007	Armagh City, Banbridge and Craigavon Borough Council
DPS-013	Antrim and Newtownabbey Borough Council
DPS-022	Newry, Mourne and Down District Council
DPS-033	Clyde Shanks on behalf of Neptune Carleton
DPS-041	Belfast City Council
DPS-061	Fleming Mounstephen Planning on behalf of Central Craigavon Ltd
DPS-062	TSA Planning on behalf of Unicorn Group
DPS-064	Invest Northern Ireland (Invest NI)
DPS-095	Turley on behalf of Plantation Landowner Group
DPS-101	Turley on behalf of JH Price & Sons
DPS-102	Turley on behalf of Lagan Homes Ltd
DPS-103	Turley on behalf of Viewpoint Developments Ltd
DPS-104	Turley on behalf of Chambers Homes Ltd
DPS-106	Turley on behalf of Individual
DPS-107	Turley

## Council Consideration of Issues Raised

Main Issue(s) Raised	Council Consideration
<p>Antrim and Newtownabbey Borough Council commented that the dPS (Part 1, page 71), advises: <i>'There is potential to provide a range of flexible commercial accommodation and business parks at the Maze Lands'</i>. However, no detail has been provided on the Maze site nor an analysis of it in the Council's Employment Land Review. Without this information, Antrim and Newtownabbey Borough Council is concerned that the potential impact of future development of this site on neighbouring council areas has not been fully considered particularly when this is viewed in combination with the quantum of employment land proposed to be allocated across the Council area (583.45 hectares zoned with 220.68 hectares undeveloped, excluding the Maze site).</p> <p>Antrim and Newtownabbey Borough Council also notes that there is no clear reference in the published Sustainability Appraisal in relation to the social, economic and environmental impacts of the lands at the Maze coming forward as a Strategic Land Reserve of Regional Importance.</p>	<p>The Council notes the comment, however the quote highlighted by Antrim and Newtownabbey Borough Council is a reference to the Maze lands as contained in the Regional Development Strategy 2035. Paragraph 4.28 of the RDS 2035 remains relevant in that the Maze lands are a strategic land reserve of regional importance in public ownership and that 'a mix of uses that will enable a major physical, economic and social development package of regional significance to come forward will be promoted'. The development of the site for regionally significant uses remains an unknown at this time and, as paragraph 4.29 of the RDS 2035 states: 'The Department will deal with (such) regionally significant development'. In preparing its dPS the Council is not therefore in a position to anticipate what form such development may take, be it an economic, environmental or social development or a combination. It is therefore inappropriate for the Council to stymie other land designations on the basis of what might or might not come forward at the Maze. For this reason no further detail on development at the Maze is contained within the dPS. Consequently, for that reason these lands have not been considered within the Employment Land Review as they do not currently form part of the existing zoned employment lands or any other land use zoning within current LDPs.</p> <p>The draft Plan Strategy SA Report has stated (in Appendix 5) that owing to the fact that the land has its own specific designation as a Strategic Land Reserve of Regional Importance, it does not fall under an employment land designation which refers to B Class uses. Therefore the site cannot be assessed under this use or any other 'presumed' use (for example, should a future use of the site consist of a non-employment use, such as Tourism or Sports). Consequently, no site-specific policy appraisal has been presented in the dPS SA for this land. An appraisal of the potential effects of retaining the Maze lands as a Strategic Land Reserve of Regional Importance, took place at the POP stage (Option 8). This is presented in the POP SA Interim Report and is accompanied by</p>

	<p>appraisals of existing employment land, Major Employment Zonings/Mixed Use Sites and Economic Development in the Countryside (Options 5, 6, 7 and 9).</p> <p>The POP SA Interim Report recognised that the future use of the site was unknown and this was reflected in the scoring. Whilst it considered the site to have potential to enable sustainable economic growth, the nature of the likely development and its impact across many of the sustainability objectives are uncertain. This is reflected in the identification of Preferred Options and subsequent policy development in the dPS.</p> <p>Should further information on the development of the Maze lands become available, the Council, at Local Policies Plan stage, will detail a site specific policy with key site requirements detailing the range of uses applicable to the site. These would be subject to a Sustainability Appraisal at that time.</p>
<p>Belfast City Council commented that the dPS seems to largely ignore the Maze Strategic Land Reserve, which the Urban Capacity Study suggests has <i>'the potential for an additional 141 hectares of employment land.'</i> If this is realised, there is therefore a strong possibility that the full extent of lands at Blaris for employment use may not be required.</p>	<p>The Council notes the comment and refers to its response above. However it is important to note that Technical Supplement 2: Urban Capacity Study (October 2019) is an evidence base only, to aid the formulation of the dPS and not an intent of Council policies or their content. The Council proposes for clarity, as a minor change, to remove references to the Maze lands from the Urban Capacity Study (page 44 and page 49) as follows:</p> <p><i>"There is a slight shortfall in land available to meet the emerging LDP requirement."</i> ; <i>however the figures above do not include the Maze Strategic Land Reserve which has the potential for an additional 141 hectares of employment land.</i></p> <p>(Ref: MC67 Minor Changes Schedule)</p> <p>The employment lands proposed as part of Policy SMU01 (Blaris), now forming part of the dPS, are however the Council's statement of intent at this strategically important location. The status of the Maze lands is a matter which the Department will have to consider should a regionally significant development proposal at the Maze lands evolve at some stage in the future.</p>
<p>TSA Planning on behalf of Unicorn Group comments that the Sustainability Appraisal does not take account of the Maze Lands:</p>	<p>The Council notes the comment and would refer to its previous response to comments</p>

<p>Whilst there is explanatory text set out at in the supporting text of the SEA (page 77), there is no corresponding strategic or operational policy for the Maze Site.</p>	<p>raised by Antrim and Newtownabbey Borough Council and Belfast City Council, above.</p>
<p>Newry, Mourne and Down District and Armagh City, Banbridge and Craigavon Borough Councils note the intention to retain the Maze Lands as a Strategic Land Reserve of Regional Importance, safeguarded from development proposals that could undermine its regional/strategic significance and that it is excluded from the employment land review and any accompanying figures.</p>	<p>The Council notes the comments and would refer to its previous response to comments raised by Antrim and Newtownabbey Borough Council and Belfast City Council, above.</p>
<p>Clyde Shanks on behalf of Neptune Carleton LLP comments, specifically in relation to SMU01 lands, that the Knockmore Link Road will be a key piece of infrastructure to unlock the development potential of West Lisburn and Maze/Long Kesh. This road will enhance strategic transport movement around Lisburn, in facilitating sustainable economic and housing development in this location and in providing a future opportunity for infrastructure linkages to be extended from the M1-Knockmore link road further to the west to allow the potential of the regionally important Maze/Long Kesh (MLK) site to be realised.</p>	<p>The Council notes the comment. This is already reflected in the Council's non-statutory West Lisburn Development Framework document which the Council has had regard to in the preparation of the draft Plan Strategy.</p>
<p>Fleming Mounstephen Planning on behalf of Central Craigavon Ltd commented that pressure on the existing transport infrastructure will increase further with proposed developments in the Maze and West Lisburn areas.</p>	<p>The Council notes the comment but considers that the provision of the Knockmore Link Road, connecting to the M1 motorway and A1 dual carriageway infrastructure, can be designed to the satisfaction of DfI Roads to ensure additional pressure on transport infrastructure is appropriately mitigated. Further detail on transport schemes will be developed through the Local Transport Plan to accompany the Local Policies Plan, in context of the wider BMTP.</p>
<p>Invest NI notes the draft Plan Strategy's approach to strategic employment land allocation. There is no reference to the Maze lands being considered a 'Simplified Planning Zone' which is a departure from the Council's potential strategic development scenarios as outlined in the Preferred Options Paper.</p>	<p>The Council notes the comment. Since publication of its Preferred Options Paper the status of the Maze lands has remained unchanged and the future direction of the Executive Office in this regard is unknown. In the absence of such strategic direction, the Council does not have the remit to progress these publically owned regionally significant lands to become a simplified planning zone. The aspiration of the Council's POP at the time of its publication, was on the basis that a strategic way forward for the Maze lands may have emerged from the Northern Ireland</p>



	<p>Executive pre-adoption of the LDP. As its future use remains unknown this option was not carried forward to the dPS.</p> <p>Should further information on the development of the Maze lands become available, the Council, at Local Policies Plan stage, will detail a site specific policy with key site requirements detailing the range of uses applicable to the site.</p>
<p>Turley made its own comments, and also on behalf of Plantation Landowner Group; JH Price &amp; Sons; Lagan Homes Ltd; Viewpoint Developments Ltd; Chambers Homes Ltd, and an Individual, in relation to the 15 year lifespan of the LDP up to the year 2032. Turley considered the LDP would be better projected out to 2035, citing a number of reasons. One of those reasons being that SMU01 at Blaris and other strategic sites such as Maze/Long Kesh would benefit from a longer term view.</p>	<p>The Council notes the comment and has addressed the matters raised within this Public Consultation Report. With regard to the benefit of an extended lifespan of the LDP and its relationship to development of Maze/Long Kesh, the Council would reiterate the points made previously. The Maze lands, remaining in public ownership, with an as yet to be decided development direction from the Northern Ireland Executive is not a valid reason to extend the lifetime of the LDP. Should an appropriate regionally significant policy direction emerge this can be accommodated through the five yearly review of the plan.</p>

## Appendix A: List of Representations Received to Plan Strategy

Representation Number	Name	Site Location Plan Submitted
DPS - 001	Trevor Lunn MLA on behalf of Individual	MPS - 001 Milltown Barnfield Road A site location plan pdf MPS - 001 Milltown Barnfield Road B site location plan pdf
DPS - 002	NATS Ltd	
DPS - 003	Cairnshill Primary School and Nursery Unit	MPS - 003 Cairnshill Primary School
DPS - 004	Department of Education	
DPS - 005	Individual	
DPS - 006	Translink	
DPS - 007	Armagh City, Banbridge and Craigavon Borough Council	
DPS - 008	Tourism NI	
DPS - 009	Department of Justice	
DPS - 010	Arqiva Ltd	
DPS - 011	GT Design on behalf of Individual	MPS - 011 Drumbo East site location plan pdf
DPS - 012	Northern Ireland Housing Executive	
DPS - 013	Antrim and Newtownabbey Borough Council	
DPS - 014	Individual	
DPS - 015	Individual	
DPS - 016	Whitemountain & District Community Association	
DPS - 017	Les Ross Planning	
DPS - 018	Les Ross Planning	
DPS - 019	Individual	
DPS - 020	Individual	
DPS - 021	Individual	MPS - 021 Carryduff Town Centre site location plan pdf
DPS - 022	Newry, Mourne & Down District Council	
DPS - 023	Matrix Planning on behalf of Individual	MPS - 023 Drumbeg West site location plan pdf
DPS - 024	Ministerial Advisory Group	
DPS - 025	Quarry Plan Ltd on behalf of Individual	MPS - 025 Lisburn Ballinderry Road site location plan pdf
DPS - 026	Matrix Planning on behalf of Individual	MPS - 026 Ballyhanwood (smaller site) site location plan pdf
DPS - 027	Matrix Planning on behalf of Individual	MPS - 027 Lisburn Moira Road site location plan pdf
DPS - 028	Matrix Planning on behalf of Individual	MPS - 028 St. James site location plan pdf

DPS - 029	Minerals Products Association Northern Ireland	
DPS - 030	Department for Communities - Historic Environment Division	
DPS - 031	Co-Ownership	
DPS - 032	Turley on behalf of Northern Ireland Federation of Housing Associations	
DPS - 033	Clyde Shanks on behalf of Neptune Carleton	MPS - 033 West Lisburn Blaris site location plan pdf
DPS - 034	Inaltus Limited on behalf of Lisburn North Development Consortium	MPS - 034 Lisburn North site location plan pdf
DPS - 035	Inaltus Limited on behalf of Porter Homes	MPS - 035A Carryduff South East site location plan pdf MPS - 035B Drumbeg (joining both nodes) site location plan pdf MPS - 035C Ballyskeagh (joining both nodes) site location plan pdf MPS - 035D Ballinderry site location plan pdf MPS - 035E Hillsborough Saddlers Hill site location plan pdf MPS - 035F Ravernet site location plan pdf
DPS - 036	Inaltus Limited on behalf of Drumkeen Holdings Ltd	
DPS - 037	Inaltus Limited on behalf of LCC Group Ltd	MPS - 037 Sprucefield site location plan pdf
DPS - 038	Inaltus Limited on behalf of Limo Properties Ltd	MPS - 038 Sprucefield site location plan pdf
DPS - 039	Inaltus Limited on behalf of O'Kane Property Ltd	MPS - 039 Hillhall site location plan pdf
DPS - 040	Inaltus Limited on behalf of Individual	MPS - 040 Castlereagh GUA Knockbracken site location plan pdf
DPS - 041	Belfast City Council	
DPS - 042	Conexpo (N.I.) Ltd	
DPS - 043	Les Ross Planning on behalf of Corbo Ltd	
DPS - 044	Turley on behalf of Lagmar Properties Ltd	
DPS - 045	Individual	MPS - 045 Dromara East site location plan pdf
DPS - 046	Northern Ireland Water	
DPS - 047	Matrix Planning on behalf of Individual	MPS - 047 Moira West site location plan pdf
DPS - 048	Turley	

	on behalf of Clanmil Housing Association	
DPS - 049	Donaldson Planning	MPS - 049 Drumbo South West site location plan pdf
DPS - 050	Donaldson Planning	MPS - 050 Carryduff Mealough site location plan pdf
DPS - 051	Donaldson Planning	MPS - 051 Carryduff Hillsborough Road site location plan pdf
DPS - 052	Donaldson Planning	MPS - 052 Dundonald Comber Road site location plan pdf
DPS - 053	Donaldson Planning	MPS - 053 Stoneyford North site location plan pdf
DPS - 054	Donaldson Planning	MPS - 054 Milltown TPO site location plan pdf
DPS - 055	Donaldson Planning	MPS - 055 Lisburn GUA McKinstry Road site location plan pdf
DPS - 056	TSA Planning on behalf of Individual	MPS - 056 Lisburn Lissue Employment Zonings site location plan pdf
DPS - 057	Department for Communities	
DPS - 059	TSA Planning on behalf of Individual	MPS - 059 Lisburn Lissue (outside SDL) site location plan pdf
DPS - 060	Department of Agriculture, Environment and Rural Affairs (NIEA Natural Environment Division)	
DPS - 061	Fleming Mounstephen Planning on behalf of Central Craigavon Ltd	
DPS - 062	TSA Planning on behalf of Unicorn Group	MPS - 062 Tullynacross site location plan pdf
DPS - 063	Individual	MPS - 063 Feumore site location plan pdf
DPS - 064	Invest Northern Ireland	
DPS - 065	Clyde Shanks on behalf of Individual	MPS - 065 Kesh Bridge site location plan pdf
DPS - 066	One2One Planning on behalf of Forestside Acquistions Ltd	
DPS - 067	TSA Planning on behalf of Fraser Houses (NI) Ltd	MPS - 067 Ballymaconaghy Road site location plan pdf
DPS - 068	TSA Planning on behalf of Rosemount Homes (Carryduff) Ltd.	MPS - 068 Carryduff South site location plan pdf
DPS - 069	TSA Planning on behalf of Lotus Homes (UK) Ltd.	MPS - 069 Glenavy Gobrana Road site location plan pdf
DPS - 070	TSA Planning on behalf of Cherrytree Holdings Ltd.	MPS - 070A Legacurry South and East site location plan pdf MPS - 070B Morningside North and South site location plan pdf

		MPS - 070C Annahilt North South and South East site location plan pdf MPS - 070D Hillsborough South East site location plan pdf
DPS - 071	TSA Planning on behalf of Individual	MPS - 071 Maghaberry North East site location plan pdf
DPS - 072	Turley on behalf of Johncorp (No. 1) Ltd	MPS - 072 Ballymaconaghy site location plan pdf
DPS - 073	Gravis Planning on behalf of MRP Investment & Development Ltd	MPS - 073 Carryduff Cadger site location plan pdf
DPS - 074	Gravis Planning on behalf of Killultagh	MPS - 074 Stoneyford site location plan pdf
DPS - 075	Gravis Planning on behalf of Individual	MPS - 075A Lower Ballinderry South site location plan pdf MPS - 075B Lower Ballinderry North site location plan pdf
DPS - 076	Gravis Planning on behalf of Hilmark Homes	MPS - 076 Lisburn Plantation site location plan pdf
DPS - 077	Gravis Planning on behalf of Conway Estates Ltd	MPS - 077A Carryduff Knockbracken Drive site location plan pdf MPS - 077B Carryduff Knockbracken Road South site location plan pdf
DPS - 078	RPS Consulting on behalf of Downshire Estate	MPS - 078 Hillsborough Downshire Monument site location plan pdf
DPS - 079	TSA Planning on behalf of Davina & Gareth Hall & Cherrytree Holdings Ltd	MPS - 079 Maghaberry South East site location plan pdf
DPS - 080	Fleming Mounstephen Planning on behalf of Individual	
DPS - 081	Fleming Mounstephen Planning on behalf of Henderson Group	
DPS - 082	Clyde Shanks on behalf of John Thompson & Sons Ltd	MPS - 082 Flush Park site location plan pdf
DPS - 083	Agent	MPS - 083 Carryduff South East site location plan pdf
DPS - 084	Ards and North Down Borough Council	
DPS - 085	Agent	MPS - 085 Maghaberry West site location plan pdf
DPS - 086	MBA Planning	
DPS - 087	Gravis Planning on behalf of Fraser Houses Ltd	MPS - 087 Carryduff East site location plan pdf
DPS - 088	Gravis Planning on behalf of Fraser Houses Ltd	MPS - 088 Crossnacreevy East site location plan pdf

DPS - 089	Gravis Planning on behalf of Fraser Houses Ltd	MPS - 089A Greengraves site location plan pdf MPS - 089B Dunlady site location plan pdf MPS - 089C Ballyhanwood site location plan pdf
DPS - 090	Dundonald Green Belt Association	
DPS - 091	Clyde Shanks on behalf of Farrans Construction	MPS - 091 Thaxton site location plan pdf
DPS - 092	Department for Economy	
DPS – 093A DPS – 093B	RSPB NI	
DPS - 094	TSA Planning on behalf of New River	MPS - 094 Sprucefield Park site location plan pdf
DPS - 095	Turley on behalf of Plantation Landowner Group	MPS - 095 Plantation site location plan pdf
DPS - 096	Northern Ireland Electricity Networks	
DPS - 097	Clyde Shanks on behalf of Individual	MPS - 097 Carnreagh site location plan pdf
DPS - 098	Gravis Planning on behalf of Fraser Houses Ltd	MPS - 098 Millmount site location plan pdf
DPS - 099	Carryduff Regeneration Forum	
DPS - 100	Turley on behalf of Individual	MPS - 100 Drumbo West site location plan pdf
DPS - 101	Turley on behalf of JH Price & Sons	MPS - 101 Aghalee site location plan pdf
DPS - 102	Turley on behalf of Lagan Homes Ltd	MPS - 102 Moira site location plan pdf
DPS - 103	Turley on behalf of Viewpoint Developments Ltd	MPS - 103 Culcavy site location plan pdf
DPS - 104	Turley on behalf of Chambers Homes Ltd	MPS - 104 Moneyreagh site location plan pdf
DPS - 105	WPB on behalf of on behalf of GHL	MPS - 105 Glenavy site location plan pdf
DPS - 106	Turley on behalf of Individual	MPS - 106 Carryduff Cadger Road site location plan pdf
DPS - 107	Turley	MPS - 107 Moneyreagh larger site location plan pdf
DPS - 108	Turley on behalf of Glengard Farms	MPS - 108A Glengard Farms Legacurry MPS - 108B Glengard Farms Legacurry
DPS - 109	Department for Infrastructure	
DPS - 110	Clyde Shanks	
DPS - 111	Joanne Bunting MLA	
DPS - 112	Matrix Planning	

	on behalf of Retail NI	
DPS - 113	Individual	
DPS - 114	McCready Architects on behalf of Individual	MPS - 114 Tullynacross site location plan pdf
DPS - 115	McCready Architects on behalf of Individual	MPS - 115 Hillhall East site location plan pdf
DPS - 116	McCready Architects on behalf of Individual	MPS - 116 Hillhall South site location plan pdf
DPS - 117	McCready Architects on behalf of Individual	MPS - 117 Drumlough site location plan pdf
DPS - 118	McCready Architects on behalf of Individual	MPS - 118 Milltown East of River site location plan pdf
DPS - 119	McCready Architects on behalf of Individual	MPS - 119 Upper Ballinderry North East site location plan pdf
DPS - 120	McCready Architects on behalf of Individual	MPS - 120 Glenavy Crumlin Road site location plan pdf
DPS - 121	McCready Architects	MPS - 121 Kesh Road site location plan pdf
DPS - 122	One2One Planning on behalf of Individual	MPS - 122 Milltown land rear of Ridge Park site location plan pdf
DPS - 123	McCready Architects	MPS - 123 Legacurry land to the rear of 293 Ballynahinch Rd site location plan pdf
DPS - 124	One2One Planning on behalf of Individual	MPS - 124 Culcavy (smaller site) site location plan pdf
DPS - 125	Company	MPS - 125 Carryduff Town Centre (South) site location plan pdf
DPS - 126	Agent	
DPS - 127	Individual	MPS - 127 Lisburn Beanstown Road site location plan pdf
DPS - 128	Blakiston Houston Estate Company	MPS - 128 Carrowreagh site location plan pdf

#### SA Representations Received to draft Plan Strategy

Representation Number	Name
DPS – 030(B)	Department for Communities - Historic Environment Division
DPS - 058	Department of Agriculture, Environment and Rural Affairs (SEA Team)

**Appendix B: Statement on how POP Representations have been taken into account**

Issues identified in POP Public Consultation Report	Summary	How Main Issues have been taken into account in draft Plan Strategy	Background and Supporting Documents
<p><b>Sections 1-4 of the POP 1 Introduction; 2 Have Your Say; 3 Policy Context; and 4 Spatial Context (page 8-10)</b></p> <p><i>Q1 Do you have any comments on the opening Sections 1-4 of the Preferred Options Paper that should be taken into account when preparing the Plan Strategy?</i></p>	<p>Whilst the largest category of respondents to this question is classed as being neutral/other, the majority of respondents agreed in principle with the broad thrust of the policy and spatial context provided in Sections 1-4 of the Preferred Options Paper, but offered additional comments for the Council to consider.</p> <p>There were repeated requests for no further development in Moira given the pressures on existing infrastructure.</p> <p>There were mixed comments on the supply of housing in terms of overall allocation and sufficient brownfield/zoned/committed sites being available.</p>	<p><u>dPS Reference: Part 1, Chapter 1 Introduction; Chapter 2 Policy and Spatial Context (page 13-31)</u></p> <p>The dPS Chapter 1 Introduction clearly sets out the relationship with other key documents, including the Council’s Community Plan (page 17); the Council’s Consultation and Engagement Strategy (page 18) and Neighbouring Councils (page 19)</p> <p>Chapter 2 Policy and Spatial Context sets out how the dPS has taken account of the regional and local policy context (page 22-24) and the spatial context and relationship between population, community, housing, economy, environment and infrastructure is set out on pages 27-29.</p> <p>Housing in settlements is addressed specifically under Plan Objective A, A Quality Place, on page 53-63.</p> <p>Strategic Policy SP08 Housing in Settlements addresses how the Plan will respond to development proposals listing 4 criteria.</p> <p>Housing supply is detailed under the Strategic Housing Allocation and its supporting Housing Growth Study.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 1 – Housing Growth Study (October 2019)</li> <li>• Technical Supplement 2 – Urban Capacity Study (October 2019)</li> <li>• Technical Supplement 6 – Countryside Assessment: Settlement Appraisals (October 2019)</li> <li>• LDP Consultation and Engagement Strategy (March 2019)</li> <li>• LDP Consultation and Engagement Strategy Workshops (21<sup>st</sup> &amp; 28<sup>th</sup> June 2019)</li> <li>• Consultation on Focussed Changes (January 2021) and Addendum to Technical Supplement 1 (January 2021) – FC1B addresses update to HGI</li> </ul>
<p><b>Section 5 Growth Strategy and Spatial Framework (page 11-12)</b></p> <p><i>Q2 Do you agree with the aims of the Council’s Growth Strategy and Spatial Framework as outlined in Section 5 of the Preferred Options Paper?</i></p>	<p>Whilst there was broad support for the growth strategy and spatial framework, comments were varied and mixed in equal proportions, some recognising that existing growth could be accommodated within the existing settlements with no need for additional housing, others saying that the strategy was not ambitious enough.</p>	<p><u>dPS Reference: Part 1, Chapter 4 Strategic Policies and Spatial Strategy (page 47-52)</u></p> <p>The dPS Chapter 4 sets out the Council’s key strategic policies and spatial growth strategy for delivering the range of land uses across the settlement hierarchy.</p> <p>The Spatial Strategy [growth strategy] (page 47-48) sets out the key aim to support development and regeneration of the area socially, economically and environmentally and how it will achieve growth in the right places, comprising of the nine bullet points identified.</p> <p>Details of the settlement hierarchy are provided to take account of issues raised (page 49-50).</p> <p>Whilst the comments received were largely site specific, details around allocations to settlements are set out in Table 3 page 64. Actual designations in terms of housing and employment zonings will be provided at LPP stage.</p>	<p>All 8 Technical Supplements (<a href="http://www.lisburncastlereagh.gov.uk/LDP">www.lisburncastlereagh.gov.uk/LDP</a>) were prepared to support the Council’s Strategic Policies and Spatial Strategy</p>
<p><b>Section 5 Cross-Cutting Themes</b></p> <p><i>Q3 Do you agree with the cross-cutting themes outlined in Section 5 of the Preferred Options Paper?</i></p>	<p>There was strong support for the cross cutting themes, with a small number of requests for inclusion and further consideration, such as climate change, flooding and further support for the historic and natural environment.</p>	<p><u>dPS Reference: Part 1, Chapter 4 Strategic Policies and Spatial Strategy (page 42-52)</u></p> <p>The seven Strategic Policies SP01-SP07 (page 42-46) are the evolution of the cross-cutting themes identified in the POP. These reflect the overall aim of furthering sustainable development as set out in the SPPS (page 11) and its five core planning principles (page 15-21). Strategic Policy SP07 Section 76 Planning Agreements takes account of issues raised regarding the need to mitigate for development in accordance with the SPPS (page 35).</p> <p>The cross-cutting themes were refined to take account of issues raised and link directly to the six Plan objectives, A: A Quality Place; B: A Thriving Place; C: A Vibrant Place; D: An Attractive Place; E: A Green Place; and F: A Connected Place.</p>	<p>All 8 Technical Supplements (<a href="http://www.lisburncastlereagh.gov.uk/LDP">www.lisburncastlereagh.gov.uk/LDP</a>) were prepared to support the Council’s Strategic Policies and Spatial Strategy</p> <p>A Section 76 Framework document is being prepared jointly by a number of Councils to assist in the implementation of Strategic Policy SP07 Section 76 Planning Agreements</p>
<p><b>Section 6 Vision and Strategic Objectives</b></p> <p><i>Q4 Do you agree with the Vision of the LDP (shared with the Community Plan) outlined in Section 6?</i></p>	<p>There was strong support for the vision, with a number of requests for inclusion and further consideration, such as renewable energy. There were mixed views received on the level of detail provided within the vision (not prescriptive or ambitious enough). Others comments were received that the vision should more clearly express ambitious aspirations for population and economic growth. Requests for recognising the</p>	<p><u>dPS Reference: Part 1, Chapter 3 Vision and Plan Objectives (page 31-41)</u></p> <p>The dPS vision was refined to take account of issues raised by expanding on the vision provided in the POP to specifically address the provision of a sustainable economy, society and the environment.</p> <p>It provides the basis for the six Plan objectives (detailed below.)</p>	<p>All 8 Technical Supplements (<a href="http://www.lisburncastlereagh.gov.uk/LDP">www.lisburncastlereagh.gov.uk/LDP</a>) were prepared to support the Council’s Vision</p> <p>LCCC Community Plan 2017-2032</p>



	importance of the natural environment were also expressed.		
<p><b>Section 6 Vision and Strategic Objectives</b></p> <p><i>Q5 Do you agree with the Strategic objectives (A-F) of the LDP outlined in Section 6?</i></p>	<p>There was strong support for the strategic objectives, with a number of requests for inclusion and further consideration, such as climate change. There were mixed views received on many of the strategic objectives, with respondents in support of greater controls of development and others seeking more flexibility to be incorporated, for example in terms of de-zoning or re-designating certain sites for alternative uses.</p>	<p><u>dPS Reference: Part 1, Chapter 3 Vision and Plan Objectives (page 31-41)</u></p> <p>The six Plan objectives (page 33-40) set out what the Plan seeks to achieve over its duration, namely A: A Quality Place; B: A Thriving Place; C: A Vibrant Place; D: An Attractive Place; E: A Green Place; and F: A Connected Place.</p> <p>These were refined to take account of issues raised, including comments received from key consultees and the public.</p> <p>For example, reference to climate change is included under Plan Objective F: 6. Mitigate and adapt to climate change by minimising greenhouse gas emissions.</p>	<p>All 8 Technical Supplements (<a href="http://www.lisburncastlereagh.gov.uk/LDP">www.lisburncastlereagh.gov.uk/LDP</a>) were prepared to support the Council's Plan Objectives</p>
<p><b>Section 7 Key Issues and Preferred Option</b></p> <p><i>Q6 Key Issue 1: The Settlement Hierarchy</i></p> <p><u>OPTION 1A – PREFERRED OPTION – Retain the existing Settlement Hierarchy with limited amendments</u></p>	<p>Majority support was provided for retention of the settlement hierarchy in that it serves the purpose of providing a network of centres across the Council area, both rural and urban. Some comments received on providing flexibility within the Plan and amendments to the settlement classifications. These are duly noted and will be considered in greater detail in preparing the Plan Strategy.</p>	<p><u>dPS Reference: Part 1, Chapter 4 Strategic Policies and Spatial Strategy (Settlement Hierarchy page 49-50; Strategic Policy 08 Housing in Settlements (page 57)</u></p> <p>The Council has carried forward its Preferred Option 1A into the settlement hierarchy taking account of issues raised (page 49-50).</p> <p>The dPS takes account of the majority support for retention of the existing settlement hierarchy (from BMAP) which is considered sufficient to accommodate the growth strategy over the Plan period, and proposes no change the existing hierarchy.</p> <p>In relation to opportunities for the redesignation of a settlement classification (for example from a small settlement to a village) the settlement hierarchy is fixed as set out in the dPS on page 49 Part 1 and therefore there is no opportunity to redesignate a settlement at the LPP stage. The LPP will however designate the extent of the settlement development limits and there may be opportunity for rounding off/infilling, in accordance with the approach outlined in the RDS, SPPS and the Council's Strategic Housing Allocation, in terms of delivering sustainable development.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 1 – Housing Growth Study (October 2019)</li> <li>• Technical Supplement 2 – Urban Capacity Study (October 2019)</li> <li>• Members' Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 11<sup>th</sup> December 2018, 17<sup>th</sup> January 2019</li> <li>• Technical Supplement 6 – Countryside Assessment (October 2019)</li> <li>• Consultation on Focussed Changes (January 2021) and Addendum to Technical Supplement 1 (January 2021) – FC1B addresses update to HGI</li> </ul>
<p><i>Q7: Key Issue 2: Facilitating Future Housing Growth (Settlements)</i></p> <p><u>OPTION 2A – PREFERRED OPTION - Focus future Housing Growth in Lisburn City with limited dispersal in the remaining settlement hierarchy, taking into account any constraints</u></p>	<p>General support is evident for the Preferred Option to focus future Housing Growth in Lisburn City with limited dispersal in the remaining settlement hierarchy, taking into account any constraints.</p> <p>Comments on providing more flexibility within the Plan and a more balanced distribution of housing growth both within Lisburn City and across the remaining settlements will be considered in greater detail in preparing the Plan Strategy.</p> <p>It is agreed that the SPPS states, in paragraph 6.140 that it is necessary to ensure that at least a 5 year supply of land for housing is maintained. However, this can be achieved through a 'plan, monitor and manage' approach. Monitoring will be an ongoing process with annual reporting and review. Consequently, it will be evident when the current supply of housing land is likely to fall below a 5 year supply and further additional housing land can be zoned through a Plan review.</p>	<p>The Council has carried forward its Preferred Option 2A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective A: A Quality Place, Enabling Sustainable Communities and Delivery of New Homes (Page 54 – 64);</li> <li>• Strategic Policy SP08 Housing in Settlements (page 57)</li> <li>• Strategic Housing Allocation SHA (page 58-64)</li> </ul> <p>Whilst the comments received were mixed, both in support of the Council's housing growth, and those seeking more housing growth, the Council having considered the matters raised, and based on its evidence base, has concluded that Strategic Policy SP08 Housing in Settlements and the related Strategic Housing Allocation is the appropriate approach to accommodating future housing growth in accordance with both the RDS 2035 Housing Evaluation Framework (page 42) and SPPS Processes for Allocating Housing Land (page 71).</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 1 Housing Growth Study (October 2019)</li> <li>• Technical Supplement 2 Urban Capacity Study (October 2019)</li> <li>• Technical Supplement 6 – Countryside Assessment (Part 4 Settlement Appraisals)(October 2019)</li> <li>• Annual Housing Monitor Reports</li> <li>• Consultation on Focussed Changes (January 2021) and Addendum to Technical Supplement 1 (January 2021) – FC1B addresses update to HGI</li> <li>• Members' Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 12<sup>th</sup> September 2018, 29<sup>th</sup> October 2018, 26<sup>th</sup> November 2018, 17<sup>th</sup> January 2019</li> </ul>

	The Plan Strategy (PS) is the first stage of the two stage local development plan process. The purpose of the PS is to provide the strategic policy framework for the plan area as a whole across a range of topics whilst taking account of regional policy. It should establish the strategic direction early in the plan process in order to provide the necessary framework for the preparation of the Local Policies Plan. It is not the purpose of the Plan Strategy to deal with site specific matters which would be more appropriately addressed at the Local Policies Plan stage.		
<p><i>Q8: Key Issue 3: Facilitating Sustainable Housing in the Countryside</i></p> <p><b>OPTION 3A – PREFERRED OPTION - Retention of Existing Rural Policy-Led Approach</b></p>	The public responses received on this key issue were quite balanced with a fairly even distribution of preferences for each option. It would appear that the responses received on this Key Issue represent a general dissatisfaction with existing rural policies and this will be considered in greater detail in preparing the Plan Strategy.	<p>The Council has carried forward its Preferred Option 3A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>Objective A: A Quality Place, Enabling Sustainable Communities and Delivery of New Homes (page 54 – 65);</li> <li>Strategic Policy SP01 Sustainable Development (page 42)</li> <li>Strategic Policy SP09 Housing in the Countryside (page 66)</li> </ul> <p>Whilst the comments received were generally not in favour of existing rural policy, the Council having considered the matters raised and based on both regional strategic policy and its own evidence base, has concluded that Strategic Policy SP09 Housing in the Countryside is the appropriate approach to accommodating future housing growth beyond settlements in accordance with the regional policy approach provided in the SPPS (page 51 to 55). The Council has accounted for rural housing provision in its Strategic Housing Allocation (Table 3, Page 64)</p>	<ul style="list-style-type: none"> <li>Technical Supplement 1 – Housing Growth Study (October 2019)</li> <li>Technical Supplement 6 – Countryside Assessment (Part 3, Development Pressure Analysis)(October 2019)</li> <li>Annual Housing Monitor Report</li> <li>Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 11<sup>th</sup> December 2018</li> </ul>
<p><i>Q9: Key Issue 4: Facilitating Education, Health, Community &amp; Cultural Facilities</i></p> <p><b>OPTION 4A – PREFERRED OPTION – Land identified for education, health, community or cultural uses by the relevant providers will be protected from development for alternative uses through the new Local Development Plan</b></p>	<p>There was majority support for the Preferred Option to protect land identified for education, health, community or cultural uses by the relevant providers from development for alternative uses through the new Local Development Plan.</p> <p>Comments in relation to the need to identify the full list of relevant providers will be considered in more detail in preparing the Plan Strategy.</p>	<p>The Council, in accordance with the regional approach provided in the RDS (page 22 to 25) and the SPPS (paragraph 4.6 and 6.246), has carried forward its Preferred Option 4A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>Objective A: A Quality Place, Enabling Sustainable Communities and Delivery of New Homes (page 66 – 67);</li> <li>Strategic Policy SP02 Improving Health and Well-being (page 42)</li> <li>Strategic Policy SP10 Education, Health, Community and Culture (page 68)</li> <li>Operational Policy HOU2 (Part a) Protection of Land Zoned for Housing (page 12)</li> <li>Operational Policy HOU11 Specialist Accommodation (page 27)</li> <li>Operational Policy CF01 Necessary Community Facilities in Settlements (page 29)</li> <li>Operational Policy CF02 Protection of a Local Community Facility (page 30)</li> <li>Operational Policy COU13 Necessary Community Facilities in the Countryside (page 40)</li> </ul> <p>The Council having considered the matters raised through consultation has concluded that Strategic Policies SP02 and SP10 are the appropriate approach to ensure the provision required under Key Issue 4. The Operational Policies of the dPS will further ensure such provision under Objective A. The Council will, where necessary and in consultation with relevant stakeholders, identify and zone sufficient land for the specific uses outlined in Key Issue 4 at Local Policies Plan stage.</p>	<ul style="list-style-type: none"> <li>Technical Supplement 6 – Countryside Assessment (Part 4, Settlement Appraisals) (October 2019)</li> <li>LCCC Community Plan 2017-2032 and involvement of Community Groups</li> <li>Joint workshops with LCCC Community Plan – See Self-Assessment of Soundness document</li> <li>Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 26<sup>th</sup> November 2018, 13<sup>th</sup> December 2017, 13<sup>th</sup> December 2017</li> </ul>
<p><i>Q10: Key Issue 5: Safeguarding Existing Employment Land</i></p> <p><b>OPTION 5A – PREFERRED OPTION - Maintain the</b></p>	There was general support for the Council’s Preferred Option to maintain the current provision of land zoned for employment (with the exception of the West Lisburn/Blaris major Employment Location).	<p>The Council, in accordance with the regional approach provided in the RDS (RG1 page 31 to 32) and the SPPS (para 6.89, page 58) has carried forward its Preferred Option 5A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>Objective B: A Thriving Place, Driving Sustainable Economic Growth (page 70 – 85);</li> <li>Strategic Policy SP01 Sustainable Development (page 42)</li> </ul>	<ul style="list-style-type: none"> <li>Technical Supplement 3 – Employment Land Review</li> <li>The Employment &amp; Industry Monitor</li> <li>West Lisburn Development Framework 2018 (draft)</li> </ul>

<p><i>current provision of land zoned for employment (with the exception of the West Lisburn/Blaris Major Employment Location)</i></p>	<p>Comments on to the need for a full review of all employment land as well as annual monitoring of employment land usage are noted and will be considered in greater detail through an Urban Capacity Study during the preparation of the Plan Strategy.</p>	<ul style="list-style-type: none"> <li>• Strategic Policy SP04 Supporting Sustainable Economic Growth (page 43)</li> <li>• Strategic Policy SP11 Economic Development in Settlements (page 76)</li> <li>• Strategic Mixed Use 01 West Lisburn/Blaris (page 78 – 79)</li> <li>• Strategic Mixed Use 02 Purdysburn/Knockbracken (page 80 – 81)</li> </ul> <p>The Council, having considered the matters raised through consultation and having reviewed existing employment land provision, has concluded that sustainable economic growth within its district can be appropriately achieved through Strategic Policies SP04 and SP11. The Council will further consider the quantum of available employment land and its future use at Local Policies Plan stage.</p>	<ul style="list-style-type: none"> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 31<sup>st</sup> January 2019</li> </ul>
<p><i>Q11: Key Issue 6: West Lisburn/Blaris Major Employment Location (MEL)</i></p> <p><i>OPTION 6A – PREFERRED OPTION - Redesignate the Blaris Major Employment Zoning as a Mixed Use site</i></p>	<p>It is evident that the public responses on this Key Issue were quite balanced with a fairly even distribution between supportive and non-supportive comments for the Preferred Option. It should be noted that a number of the non-supportive comments received still support the designation of the West Lisburn/Blaris Major Employment Location as a mixed use site but wish to see two separate zonings for housing and employment. A number of comments were received seeking further clarification on a number of issues and these will be considered in greater detail in preparing the Plan Strategy.</p>	<p>The Council, in accordance with the regional approach provided in the RDS (SFG1 page 54) and the SPPS (paragraph 6.94, page 59) has carried forward its Preferred Option 6A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective A: A Quality Place, Enabling Sustainable Communities and Delivery of New Homes (Page 54 – 64);</li> <li>• Strategic Policy SP08 Housing in Settlements (page 57)</li> <li>• Strategic Housing Allocation SHA (page 58-64)</li> <li>• Objective B: A Thriving Place, Driving Sustainable Economic Growth (page 70 – 85);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP04 Supporting Sustainable Economic Growth (page 43)</li> <li>• Strategic Policy SP11 Economic Development in Settlements (page 76)</li> <li>• Strategic Mixed Use 01 West Lisburn/Blaris (page 78 – 79)</li> </ul> <p>Whilst the comments received were mixed (both for and against the redesignation of West Lisburn/Blaris) the Council, having considered its evidence base has concluded that mixed use on the site is appropriate to achieve its Plan Objectives A and B through provisions made under Strategic Policy SP04 Supporting Sustainable Economic Growth, Strategic Policy SP08 Housing in Settlements, and Strategic Policy SP11 Economic Development in Settlements.</p> <p>Strategic Mixed Use 01 (SMU01) of the Plan Strategy contains sufficient detail on specific requirements to be contained in a Concept Masterplan to inform and address comments made at the POP regarding the future direction of development on the site.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 1 Housing Growth Study (October 2019)</li> <li>• Technical Supplement 2 Urban Capacity Study (October 2019)</li> <li>• Technical Supplement 3 – Employment Land Review</li> <li>• Technical Supplement 4 – Office Capacity Study</li> <li>• The Employment &amp; Industry Monitor</li> <li>• West Lisburn Development Framework 2018 (draft)</li> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 31<sup>st</sup> January 2019</li> </ul>
<p><i>Q12: Key Issue 7: Purdysburn Mixed Use Site Major Employment Location (MEL)</i></p> <p><i>OPTION 7A – PREFERRED OPTION - Retain the existing Purdysburn Major Employment Location as a Mixed Use site</i></p>	<p>There was general support for the Council’s Preferred Option to retain the existing Purdysburn Major Employment Location. Comments received in relation to further clarification on the future development of the site will be considered in greater detail during the preparation of the Plan Strategy.</p>	<p>The Council, in accordance with the regional approach provided in the RDS (SFG1 page 54) and the SPPS (paragraph 6.94, page 59) has carried forward its Preferred Option 7A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective B: A Thriving Place, Driving Sustainable Economic Growth (page 70 – 85);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP04 Supporting Sustainable Economic Growth (page 43)</li> <li>• Strategic Policy SP11 Economic Development in Settlements (page 76)</li> <li>• Strategic Mixed Use 02 Purdysburn/Knockbracken (page 80 – 81)</li> </ul> <p>Comments received offered support for retention of Purdysburn as a Mixed Use Site and the Council, having considered its evidence base has concluded that mixed uses on the site is appropriate to achieve its Plan Objective B through Strategic Policy SP04 Supporting Sustainable Economic Growth and Strategic Policy SP11 Economic Development in Settlements.</p> <p>Strategic Mixed Use 02 (SMU02) of the Plan Strategy contains sufficient detail on specific requirements to be contained in a Concept Masterplan, to inform and address comments made at the POP regarding the future direction of development on the site.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 3 – Employment Land Review</li> <li>• Technical Supplement 4 – Office Capacity Study</li> <li>• The Employment &amp; Industry Monitor</li> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 31<sup>st</sup> January 2019</li> </ul>
<p><i>Q13: Key Issue 8: The Maze Lands Strategic Land</i></p>	<p>There was majority support for retaining the designation of the Maze Lands as a Strategic Land Reserve of Regional Importance.</p>	<p>The Council has carried forward its Preferred Option 8A through to the Spatial Strategy in its dPS, recognising its status as a Strategic Land Reserve of Regional Importance (page 77). Development of the Maze Lands is the responsibility of the Office of the First and Deputy First Minister and, in</p>	<ul style="list-style-type: none"> <li>• West Lisburn Development Framework 2018 (draft)</li> </ul>

<p><i>Reserve of Regional Importance</i></p> <p><b>OPTION 8A – PREFERRED OPTION - Retain designation of the Maze Lands as a Strategic Land Reserve of Regional Importance</b></p>	<p>Comments received on providing more clarification on the use of Simplified Planning Zones and connectivity issues will be considered in greater detail in preparing the Plan Strategy.</p>	<p>recognising its regional status provided in the RDS (paragraph 4.28, page 87), development of which is beyond control of the Council, the Plan Strategy does not require to consider it further nor accommodate it through specific policies. The regional nature and benefits derived from any possible future development of the site will not significantly impact on any other policies of the Plan Strategy.</p>	<ul style="list-style-type: none"> <li>Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 31<sup>st</sup> January 2019</li> </ul>
<p><b>Q14: Key Issue 9: Facilitating Sustainable Rural Economic Development in Countryside</b></p> <p><b>OPTION 9A – PREFERRED OPTION - Retention of the existing policy-led approach</b></p>	<p>There was a general lack of support for the Preferred Option for retention of the existing policy-led approach for facilitating Sustainable Rural Economic Development in Countryside. There was, however, broad support for Option 9B – Retention of the existing policy-led approach but in addition allow for the possible creation of “Rural Business Development Zones” in a limited number of key/strategic locations as well as comments seeking further clarification on this option which will be considered in greater detail in preparing the Plan Strategy.</p>	<p>The Council, in accordance with the regional status provided in the RDS (SFG1, page 54) and the strategic policy of the SPPS (paragraph 6.87, page 57) has carried forward its Preferred Option 9A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>Objective B: A Thriving Place, Driving Sustainable Economic Growth (page 70 – 86);</li> <li>Strategic Policy SP01 Sustainable Development (page 42)</li> <li>Strategic Policy SP12 Economic Development in the Countryside (page 87)</li> <li>Operational Policy COU11 Farm Diversification (page 38)</li> <li>Operational Policy COU14 The Conversion and Reuse of Buildings for Non-Residential Use (page 40)</li> <li>Operational Policy ED3 Expansion of an Established Economic Development Use in the Countryside (page 45)</li> <li>Operational Policy ED4 Redevelopment of an Established Economic Development Use in the Countryside (page 46)</li> <li>Operational Policy ED5 Major Economic Development Use in the Countryside (page 47)</li> <li>Operational Policy ED6 Small Rural Projects (page 47)</li> </ul> <p>Comments received showed preference for Preferred Option 9B to aid rural economies to better support the population of the countryside. Whilst the Council recognises this preference its policies have been developed taking cognisance of both the regional and strategic policies on this matter and its own policies of focussing sustainable economic growth on those lands, mostly within its settlements, already zoned for economic uses, see Key Issues 5, 6 and 7 above. The Council does however recognise the importance of rural economic development and through Operational Policies it seeks to provide assurance on an appropriate and sustainable direction for those living and seeking to work in the countryside.</p>	<ul style="list-style-type: none"> <li>Technical Supplement 3 – Employment Land Review</li> <li>Technical Supplement 6 – Countryside Assessment</li> <li>Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 31<sup>st</sup> January 2019</li> </ul>
<p><b>Q15: Key Issue 10: Mineral Safeguarding Zones and Areas of Mineral Constraint</b></p> <p><b>OPTION 10A - PREFERRED OPTION - Provide Mineral Safeguarding Zones and Areas of Mineral Constraint in addition to the existing policy-led approach in relation to Mineral Development</b></p>	<p>There was clearly majority support for the provision of Mineral Safeguarding Zones and Areas of Mineral Constraint in addition to the existing policy-led approach to Mineral Development. Several comments were received on the need for further information, the need for a co-ordinated approach and wider policy consideration. These issues will be considered in greater detail in preparing the Plan Strategy.</p>	<p>The Council, in accordance with the regional approach set out in the SPPS (paragraph 6.155, page 77), has carried forward its Preferred Option 10A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>Objective B: A Thriving Place, Driving Sustainable Economic Growth (page 70 – 88);</li> <li>Strategic Policy SP13 Mineral Development (page 89)</li> <li>Operational Policy MD1 Environmental Protection (page 51)</li> <li>Operational Policy MD2 Visual Impact (page 51)</li> <li>Operational Policy MD3 Areas of Mineral Constraint (page 51)</li> <li>Operational Policy MD4 Valuable Minerals (page 52)</li> <li>Operational Policy MD5 Unconventional Hydrocarbon Extraction (page 52)</li> <li>Operational Policy MD6 Mineral Safeguarding Areas (page 52)</li> <li>Operational Policy MD7 Safety and Amenity (page 53)</li> <li>Operational Policy MD8 Traffic Implications (page 53)</li> <li>Operational Policy MD9 Restoration Proposals (page 53)</li> </ul> <p>Comments received show support for Safeguarding Zones and Areas of Mineral Constraint along with continuation of the existing policy led approach. Having considered the comments the Council will continue, through its Operational Policies, with the existing policy led approach. The Council has</p>	<ul style="list-style-type: none"> <li>Technical Supplement 6 – Countryside Assessment</li> <li>Minerals Working Group 17<sup>th</sup> June 2019, 26<sup>th</sup> September 2019</li> <li>Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 31<sup>st</sup> January 2019</li> <li>Minerals Industry Workshop 16<sup>th</sup> August 2019</li> <li>LCCC Local Biodiversity Action Plan.</li> <li>Landscape Character Assessment.</li> <li>Lough Neagh Forum – 27<sup>th</sup> April 2017, September 2017, 8<sup>th</sup> November 2017, 31<sup>st</sup> January 2019</li> </ul>

		also commenced a co-ordinated approach to this aspect of its dPS and is working closely with neighbouring councils, Central Government (DfE) and the minerals industry. As a result further work will come forward at Local Policies Plan stage to identify Mineral Safeguarding Zones and Areas of Constraint.	
<p><i>Q16: Key Issue 11: Growing Lisburn City Centre</i></p> <p><b>OPTION 11A – PREFERRED OPTION - Extend the existing City Centre boundary</b></p>	<p>The majority of responses received supported the Council’s Preferred Option to extend Lisburn City Centre. The existing Development Plan designates a City Centre boundary which currently excludes the Lisburn LeisurePlex from within the existing boundary and as a result this area remains disconnected from the City Centre. Many recognised that the role of cities and town centres is changing from a predominantly retail focus to include a wider focus such as leisure, recreation, community uses and provision of food/drink services.</p>	<p>The Council has not carried forward its Preferred Option 11A through to the Spatial Strategy, as it is considered this is a matter to be fully addressed as part of the Local Policies Plan. The Council proposes at this stage of the Plan process to ‘retain the existing city centre boundary’ (in accordance with Option 11B) in the dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective C: A Vibrant Place, Growing our City, Town Centres, Retailing and Other Uses (page 92 – 98);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP14 Town Centres, Retailing and Other Uses (page 96)</li> <li>• Operational Policy TC1 Town Centre, Retailing and Other Uses (page 56)</li> <li>• Operational Policy TC2 Lisburn City Centre Primary Retail Core and Retail Frontage (page 56)</li> </ul> <p>Whilst comments received show support for expanding the city centre boundary they also recognise that the role of City, and indeed all centres, is changing. Having considered the evidence base (Retail Capacity Study, see Technical Supplement 5) and having taken account of the current retailing climate, the Council, in seeking to achieve Objective C, supports the existing City Centre through Strategic Policy SP14, Town Centres, Retailing and Other Uses and Operational Policies TC1 and TC2. Further work on redefining and expanding the city centre, based on the evidence and prevailing retailing climate and in accordance with the regional strategic objectives and policy approach set out in the SPPS (page 101 to 103) will be considered at Local Policies Plan Stage.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 5 – Retail Capacity Study</li> <li>• Lisburn City Centre Masterplan Review 2019 (Draft)</li> <li>• Laganbank Quarter Comprehensive Development Scheme 2015 (Draft)</li> <li>• LCCC Car Park Strategy 2019 (Draft)</li> <li>• Members’ Planning Policy Review Workshop – 20<sup>th</sup> November 2017, 13<sup>th</sup> December 2017, 24<sup>th</sup> January 2019</li> </ul>
<p><i>Q17: Key Issue 12: Strengthening Existing Town Centres</i></p> <p><b>OPTION 12A – PREFERRED OPTION - Retain the existing town centre of Carryduff and designate town centre boundaries in the historic towns of Hillsborough and Moira</b></p>	<p>The majority of responses were supportive of the Council’s Preferred Option to have town centres for Carryduff, Hillsborough and Moira in order to give more identity to these towns and strengthen their function with attracting services and providing a sense of place. However, concerns have focused around the built heritage in Hillsborough and Moira and the conflict with Conservation Areas and also that designation of town centres could restrict development. Planning policy in the town centres would need to allow for some flexibility. Some representations have also called for additional Town Centre designations in Dundonald and the area around Newtownbreda/Forestside.</p>	<p>The Council has carried forward its Preferred Option 12A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective C: A Vibrant Place, Growing our City, Town Centres, Retailing and Other Uses (page 92 – 98);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP14 Town Centres, Retailing and Other Uses (page 96)</li> <li>• Operational Policy TC1 Town Centre, Retailing and Other Uses (page 56)</li> <li>• Operational Policy TC3 Town Centres (page 57)</li> </ul> <p>Comments received show support for retention and designation of town centres in Carryduff, Hillsborough and Moira. Whilst taking cognisance of its views in Key Issue 11 above, on the current retailing climate, the Council recognises the importance of Carryduff, Moira and Hillsborough within the retailing hierarchy of the district. Having considered its evidence base and current retailing conditions, further work on strengthening these towns, including designation of town centre boundaries in Hillsborough and Moira, is necessary to achieve Objective C and will be considered at Local Policies Plan stage.</p> <p>Operational Policies TC1 and TC3 of the dPS propose to support and strengthen the retailing provision these towns provide for their populations and those living in their hinterlands. The need, or otherwise to define additional town centres, in accordance with the regional strategic objectives and policy approach set out in the SPPS (page 101 to 103), will also be considered at Local Policies Plan stage, having regard to the existing retail hierarchy and future need.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 5 – Retail Capacity Study</li> <li>• Lisburn City Centre Masterplan Review 2019 (Draft)</li> <li>• Laganbank Quarter Comprehensive Development Scheme 2015 (Draft)</li> <li>• LCCC Car Park Strategy 2019 (Draft)</li> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 24<sup>th</sup> January 2019</li> </ul>
<p><i>Q18: Key Issue 13: Sprucefield Regional Shopping Centre</i></p> <p><b>OPTION 13A – PREFERRED OPTION - Retain and</b></p>	<p>The Preferred Option to retain and reinforce Sprucefield as a Regional Shopping Centre has been supported by the majority of responses. However, the type of uses that should be allowed and the impact on neighbouring city and town centres should be further considered. A number of representations</p>	<p>The Council has not carried forward its Preferred Option 13A through to the Spatial Strategy in its dPS, rather, based on the evidence presented in the Retail Capacity Study (Technical Supplement 5) it has opted for Preferred Option 13B ‘Retain and Reinforce Sprucefield as a Regional Shopping Centre but extend uses to include recreation and leisure’. Policy SFG1 (page 54) of the RDS retains Sprucefield as a regional shopping centre, although it does not offer a definition of what such a regional shopping centre is. The SPPS is silent on Sprucefield’s regional role and its status sitting outside the retailing hierarchy. It is appropriate for the Council to define Sprucefield’s role within its</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 5 – Retail Capacity Study</li> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 24<sup>th</sup> January 2019</li> </ul>

<p><i>reinforce Sprucefield as a Regional Shopping Centre</i></p>	<p>called for the ‘bulky goods’ restriction to be lifted and some go further to call for mixed uses such as leisure and recreation outside of the traditional retailing definition. A number of respondents only supported development at Sprucefield that is in accordance with the “Town Centres First” approach, as expressed in the RDS and SPPS.</p>	<p>own Plan Strategy and, whilst protecting the defined and established retailing hierarchy in and beyond its district, the Council proposes to expand the functions allowed at Sprucefield by designating it a Strategic Mixed Use (SMU03) site;</p> <ul style="list-style-type: none"> <li>• Objective C: A Vibrant Place, Growing our City, Town Centres, Retailing and Other Uses (page 102);</li> <li>• Strategic Mixed Use 03 Sprucefield Regional Shopping Centre (page 103)</li> </ul> <p>Comments received show support for the preferred option. Taking cognisance of concerns about impact on existing retailing centres, the status of Sprucefield at a regional level and a lack of clarity at strategic level has required the Council to consider a way forward. With safeguarding provided by Key Site Requirements in SMU03 the Council considers Sprucefield will operate at a regional level without detriment to the ‘Town Centre first approach’ in existing centres and that it is also appropriate to expand the uses to include leisure and retail. This latter point reflects the strategic policy requirement to concentrate a mix of uses into defined centres.</p>	
<p><i>Q19: Key Issue 14: Strengthening District &amp; Local Centres</i></p> <p><i>OPTION 14A – PREFERRED OPTION - Extend District and Local Centre Boundaries</i></p>	<p>The Council’s Preferred Option to extend the District Centre at Forestside and the Local Centre at Dundonald had majority support. However, a number of representations have highlighted that the SPPS states that planning authorities must adopt a ‘Town Centre’ first approach for retail and main town centre uses. Some representations have called for town centre designations instead of District and Local Centres for Forestside/Newtownbreda and Dundonald. Comments on the need for a review of retailing and Town/District/Local Centres, (including Sprucefield) are noted and will be considered in greater detail through a Retail Capacity Study during the preparation of the Plan Strategy.</p>	<p>The Council has not carried forward its Preferred Option 14A, as it is considered this is a matter to be fully addressed as part of the Local Policies Plan. The Council proposes at this stage of the Plan process to ‘Retain the existing boundaries at Forestside District Centre and Dundonald Local Centre’ (in accordance with Option 14B) in the dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective C: A Vibrant Place, Growing our City, Town Centres, Retailing and Other Uses (page 92 – 98);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP14 Town Centres, Retailing and Other Uses (page 96)</li> <li>• Operational Policy TC1 Town Centre, Retailing and Other Uses (page 56)</li> <li>• Operational Policy TC3 Town Centres (page 57)</li> <li>• Operational Policy TC4 District and Local Centres (page 57)</li> </ul> <p>Comments received show support for Council’s preferred option 14A, however, having taken cognisance of the town centre first approach set out in the SPPS (page 102, paragraph 6.273) and the requirement to retain and consolidate existing district and local centres (page 102, paragraph 6.276) its own evidence base and the points raised in Key Issues 11 and 12 above, the Council intends to further consider the issue of extending District and Local Centre Boundaries and those comments raised in representation, for and against this option, at Local Policies Plan stage.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 5 – Retail Capacity Study</li> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 24<sup>th</sup> January 2019</li> </ul>
<p><i>Q20: Key Issue 15: Growing the Night Time Economy</i></p> <p><i>OPTION 15A – PREFERRED OPTION - Grow the Night Time Economy</i></p>	<p>In growing the night-time economy, the Council welcomes the support from respondents to encourage the provision of a range of retailing, commercial and cultural venues alongside hotel development and restaurants/bars. Providing a mix of these uses within the city and town centres can help to grow the night-time economy, create jobs and enhance the built environment through regenerating previously unused buildings. Respondents recognised that a range of activities in a city or town centre increases their viability and vitality. Opportunity exists to strengthen the role of the City Centre by providing closer linkages between the leisure and entertainment offer at the Leisure Park and the retail offer of Lisburn City Centre. The majority of comments are in support of growing the night-time economy in Lisburn</p>	<p>The Council has carried forward its Preferred Option 15A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective C: A Vibrant Place, Growing our City, Town Centres, Retailing and Other Uses (page 99);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP15 Evening/Night-time Economy (page 100)</li> <li>• Operational Policy TC1 Town Centre, Retailing and Other Uses (page 56)</li> <li>• Operational Policy TC3 Town Centres (page 57)</li> <li>• Operational Policy TOU1 Tourism Development in Settlements (page 62)</li> </ul> <p>Comments received show support for Council’s preferred option. In accordance with the regional strategic objectives and policy approach set out in the SPPS (page101 to 103) for appropriate uses in town centres and the support offered in Key Issues 11 to 13 above, the strategic and operational policies proposed will support the Preferred Option.</p>	<ul style="list-style-type: none"> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 24<sup>th</sup> January 2019</li> </ul>



	City and the towns to make an important contribution to the overall economic growth of the area.		
<p><i>Q21 Key Issue 16: Promoting Office Development within the City, Town, District and Local Centres</i></p> <p><i>OPTION 16A – PREFERRED OPTION - Promoting Office Development within the City, Town, District and Local Centres</i></p>	<p>The majority of respondents supported the Council’s Preferred Option to promote office development within the City, Town, District and Local Centres. The desire is therefore to promote office development in order to support sustainable development, assist urban renaissance and provide jobs in local areas. Respondents recognised that offices can complement the retail function in these areas. A sequential approach should be applied to new office development with the City and Town Centres being the first location. However, some conflict may exist between conservation areas/historic buildings. Parking could also be a deterrent to office location and that some flexibility may be required. Comments on the need to assess office provision are noted and will be considered in greater detail through an Office Study during the preparation of the Plan Strategy.</p>	<p>The Council has carried forward its Preferred Option 16A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective C: A Vibrant Place, Growing our City, Town Centres, Retailing and Other Uses (page 92 – 95);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP14 Town Centres, Retailing and Other Uses (page 96)</li> <li>• Operational Policy TC1 Town Centre, Retailing and Other Uses (page 56)</li> <li>• Operational Policy TC2 Lisburn City Centre Primary Retail Core and Retail Frontage (page 56)</li> <li>• Operational Policy TC3 Town Centres (page 57)</li> <li>• Operational Policy TC4 District and Local Centres (page 57)</li> <li>• Operational Policy TC5 Villages and Small Settlements (page 58)</li> </ul> <p>Comments received show support for Council’s preferred option and, in accordance with the regional approach provided in the RDS (policy SFG1, page 54) and the strategic objectives and policy approach set out in the SPPS (page 101 to 103), the support offered in Key Issues 11 to 13 above, the strategic and operational policies proposed will support this Preferred Option to promote office development in existing centres. Additionally the Operational Policies TC1 to TC5 exist to both allow and control the level of office development, ensuring the overall vitality of centres is not solely dominated by non-retail development.</p> <p>Comments received in respect of conflicts with proposed office use in Conservation Areas and listed buildings can be dealt with through the Development Management process and its appropriate use of all relevant operational policies of the Plan Strategy relating to the same.</p> <p>Comments received on matters of car parking in relation to office development are again a matter for the Development Management process and use of appropriate operational policies, however it should be considered that the Plan Strategy and supporting operational policies seek to achieve more sustainable forms of transport and travel, regardless of uses proposed in existing centres.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 3 – Employment Land Review</li> <li>• Technical Supplement 4 – Office Capacity Study</li> <li>• Technical Supplement 5 – Retail Capacity Study</li> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 24<sup>th</sup> January 2019</li> </ul>
<p><i>Q22: Key Issue 17: City Centre Development Opportunity Sites</i></p> <p><i>OPTION 17A – PREFERRED OPTION - Identify potential Development Opportunity Sites within Lisburn City Centre</i></p>	<p>The majority of responses received supported the Council’s Preferred Option to identify development opportunity sites within Lisburn City Centre. Some representations have also called for additional opportunity sites in the Town, District and Local Centres to be identified. Some of the representations wish to see a flexible approach to opportunity sites with not too may restrictive key site requirements (KSRs). Others require a careful approach to protect existing historic buildings and the wildlife/biodiversity needs on any opportunity sites identified.</p>	<p>The Council has not carried forward its Preferred Option 17A as it is considered this is a matter to be fully addressed as part of the Local Policies Plan. The Council proposes at this stage of the Plan process, to reinforce the important function Lisburn City Centre plays in the settlement and retailing hierarchies and has taken account of the issues raised through its Strategic and Operational policies.</p> <ul style="list-style-type: none"> <li>• Objective C: A Vibrant Place, Growing our City, Town Centres, Retailing and Other Uses (page 92 – 95);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP14 Town Centres, Retailing and Other Uses (page 96)</li> <li>• Operational Policy TC1 Town Centre, Retailing and Other Uses (page 56)</li> <li>• Operational Policy TC2 Lisburn City Centre Primary Retail Core and Retail Frontage (page 56)</li> </ul> <p>Comments received raised concern that such development opportunity sites should not be overly restricted by Key Site Requirements, or that consideration of such should respect the existing historic and natural environments. These matters will be considered further, along with Key Issue 11, at Local Policies Plan stage however, it should be noted that operational policies and the Lisburn Conservation Area designation, where applicable will secure and minimise threats to historic and natural environments within the city centre when development proposals are being considered.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 5 – Retail Capacity Study</li> </ul>
<p><i>Q23: Key Issue 18: Promoting Hillsborough Castle as a Key Tourism Destination</i></p>	<p>The majority of the respondents were in favour of promoting Hillsborough Castle as a Key Tourism Destination. The LDP must deliver a policy framework that conserves the assets</p>	<p>The Council has carried forward its Preferred Option 18A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective D: An Attractive Place, Promoting Sustainable Tourism, Open Space, Sport and Outdoor Recreation (page 108 – 112);</li> </ul>	<ul style="list-style-type: none"> <li>• Technical Supplement 7 – Open Space, Sport and Outdoor Recreation</li> <li>• Position Paper 11 – Tourism</li> </ul>

<p><i>PREFERRED OPTION 18A – PREFERRED OPTION - Promote Hillsborough Castle as a Key Tourism Destination</i></p>	<p>that make Hillsborough special and encourages a synergy between it and the Castle and grounds through policies that ensure new tourism projects complement Hillsborough and the existing offer, rather than compete and conflict with them. Respondents encouraged a policy framework which safeguards the built and natural heritage assets that are critical to the tourism offer and promotes the development of tourism facilities appropriate to their proposed location and position within the tourism hierarchy.</p>	<ul style="list-style-type: none"> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP16 Tourism (page 114)</li> <li>• Operational Policy TOU1 Tourism Development in Settlements (page 62)</li> <li>• Operational Policy TOU8 Safeguarding of Tourism Assets (page 67)</li> <li>• Operational Policy HE5 Historic Parks, Gardens and Demesnes of Special Historic Interest (page 76)</li> </ul> <p>Comments received were by majority in favour of this preferred option and, in accordance with the regional approach provided in the RDS (policy RG4, page 35 and policy RG11, page 47 to 48) and the strategic objectives set out in the SPPS (page 97 to 98) the Council through its Plan Strategy does recognise Hillsborough Castle as one of a number of key tourism destinations within its district. This preferred option has somewhat moved on as the Castle has, since publication of the POP, been developed by Historic Royal Palaces into a key tourism asset and therefore fulfils the key issue set down by the Council in its POP. The Spatial Strategy and its strategic and operational policies are there to protect the materiality of the Castle’s tourism attraction when further proposals for development in its vicinity may come forward.</p>	<ul style="list-style-type: none"> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 14<sup>th</sup> February 2019</li> </ul>
<p><i>Q24: Key Issue 19: Promoting the Lagan Navigation as a Key Tourism / Recreation Opportunity Area</i></p> <p><i>OPTION 19A– PREFERRED OPTION - Promote the implementation of the Lagan Navigation as a key Tourism / Recreation Opportunity Area</i></p>	<p>The majority of responses received supported the Council’s Preferred Option in promoting the Lagan Navigation as a Key Tourism/Recreation Opportunity Area. It has been realised that the project requires investment and its development could provide better links to the settlements along its route with potential for aligning the group of small towns, villages and strategic assets the area contains. A number of concerns state that the full route of the Lagan Navigation needs protection from inappropriate development with possible extension of the Lagan Valley Regional Park designation or additional protection. Some representations call on additional tourism for the wider area including Dromara village and the promotion/development of the Ulster Aviation Society museum on the Maze site.</p>	<p>The Council has carried forward its Preferred Option 19A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective D: An Attractive Place, Promoting Sustainable Tourism, Open Space, Sport and Outdoor Recreation (page 108 – 117);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP16 Tourism (page 114)</li> <li>• Strategic Policy SP17 Open Space, Sport and Outdoor Recreation (page 118)</li> <li>• Operational Policy TOU2 Proposals for Tourism Amenity in the Countryside (page 62)</li> <li>• Operational Policy TOU8 Safeguarding of Tourism Assets (page 67)</li> <li>• Operational Policy OS1 Protection of Open Space (page 68)</li> <li>• Operational Policy OS4 Facilities Ancillary to Water Sports (page 70)</li> <li>• Operational Policy OS6 Outdoor Recreation in the Countryside (page 71)</li> </ul> <p>Comments received were by majority supportive of the Lagan Navigation as a key tourism/recreational opportunity. Respondents recognised the value of this asset and also the need for investment to fully utilise it. Based upon its evidence gathering and, in accordance with the regional approach provided in the RDS (policy RG4, page 35 and policy RG11, page 47 to 48) and the strategic objectives set out in the SPPS (page 97 to 98) the Council’s strategic and operational policies will favour protection of this asset from inappropriate development to ensure its value to tourism/recreation remains intact.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 7 – Open Space, Sport and Outdoor Recreation</li> <li>• Position Paper 11 - Tourism</li> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 14<sup>th</sup> February 2019</li> </ul>
<p><i>Q25: Key Issue 20: Protecting and Promoting the Lagan Valley Regional Park as a Key Tourism / Recreation Opportunity Area</i></p> <p><i>OPTION 20A – PREFERRED OPTION - Protect and Promote the Lagan Valley Regional Park as a rich natural asset, retaining and enhancing the Lagan Valley Regional Park Nodes</i></p>	<p>Approximately half of the respondents agreed with the Council’s Preferred Option, to support the protection and promotion of the Lagan Valley Regional Park as a tourism/recreation area. Others commented that additional nodes should be provided, which goes further than the Council’s Preferred Option. These representations have identified land parcels to be included in a new node. Some representations however are against expansion of the LVRP and would like to see land removed from the existing designation to be re-zoned or developed. It has also been stated that the LVRP needs a defined policy to protect it as development</p>	<p>The Council has carried forward its Preferred Option 20A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective D: An Attractive Place, Promoting Sustainable Tourism, Open Space, Sport and Outdoor Recreation (page 108 – 117);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP17 Open Space, Sport and Outdoor Recreation (page 118)</li> <li>• Operational Policy TOU8 Safeguarding of Tourism Assets (page 67)</li> <li>• Operational Policy OS1 Protection of Open Space (page 68)</li> <li>• Operational Policy OS4 Facilities Ancillary to Water Sports (page 70)</li> <li>• Operational Policy OS6 Outdoor Recreation in the Countryside (page 71)</li> <li>• Objective E: A Green Place, Protecting and Enhancing the Historic and Natural Environment (page 122 – 123 and 126)</li> <li>• Strategic Policy SP19 Protecting and Enhancing Natural Heritage (page 127)</li> <li>• Operational Policy NH6 Areas of Outstanding Natural Beauty (page 88)</li> </ul>	<ul style="list-style-type: none"> <li>• Technical Supplement 7 – Open Space, Sport and Outdoor Recreation</li> <li>• Position Paper 11 – Tourism</li> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 14<sup>th</sup> February 2019</li> </ul>



	has been allowed in the Park and development pressure is growing. Careful consideration also needs to be given for the flood plain in the LVRP, heritage assets and biodiversity. It is recognised that the LVRP is an asset that needs continued protection for tourism and recreational enjoyment. This asset should be developed with neighbouring Councils and better linkages are required to it.	Comments received were supportive of the preferred option and some sought additional lands be included within the park, whilst others sought removal of lands. Some comments raised issue with a lack of specific policy for the protection of the LVRP, to be developed in a coordinated way with neighbouring councils. The Council, having taken cognisance of the representations and, in accordance with the regional approach provided in the RDS (policy SFG5, page 58) and the strategic objectives for natural heritage assets set out in the SPPS (page 80 to 81) will further consider the issue and continue to engage with its relevant neighbouring councils on the matter. As a result the Council intends to bring forward a specific policy for the Lagan Valley Regional Park at Local Policies Plan stage. However, the strategic and operational policies contained in the Plan Strategy will further aid and protect this designation for its future tourism and recreational potential.	
<p><i>Q26: Key Issue 21: Protecting and Enhancing Open Space, Sport &amp; Outdoor Recreation</i></p> <p><i>OPTION 21A - PREFERRED OPTION – Protect and enhance all areas of open space and provide opportunity to identify a limited number of potential new Community Greenways (where possible)</i></p>	We welcome the overall support for the Preferred Option to protect and enhance all areas of open space and provide opportunity to identify a limited number of potential new Community Greenways. The Council will carry out an Open Space Strategy as part of the Plan Strategy and will consider ways of further linking up existing areas of open space.	<p>The Council, in accordance with the regional approach provided in the RDS (policy SFG5, page 58) and the strategic objectives for open space assets set out in the SPPS (page 86 to 88), has carried forward its Preferred Option 21A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective D: An Attractive Place, Promoting Sustainable Tourism, Open Space, Sport and Outdoor Recreation (page 116 – 117);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP17 Open Space, Sport and Outdoor Recreation (page 118)</li> <li>• Operational Policy OS1 Protection of Open Space (page 68)</li> <li>• Operational Policy OS6 Outdoor Recreation in the Countryside (page 71)</li> <li>• Operational Policy TRA5 Strategic Greenways and Disused Transport Routes (page 95)</li> <li>• Operational Policy TRA8 Active Travel Networks and Infrastructure Provision (page 97)</li> </ul> <p>Comments received were supportive of the preferred option and, having regard to its evidence base the Council has brought forward in its Plan Strategy strategic and operational policies to protect and further identify areas of open space and the provision of greenways at its Local Policies Plan stage.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 7 – Open Space, Sport and Outdoor Recreation</li> <li>• Members’ Planning Policy Review Workshop – 26<sup>th</sup> October 2017, 13<sup>th</sup> December 2017, 14<sup>th</sup> February 2019</li> </ul>
<p><i>Q27: Key Issue 22: Retention of Key Transportation Infrastructure Schemes (Road and Rail)</i></p> <p><i>OPTION 22A - PREFERRED OPTION – Retain a number of key transportation infrastructure schemes to enhance accessibility within the area (Roads Option, Rail Option, Disused Rail and Connectivity)</i></p>	We welcome the support for the Preferred Option to retain a number of key transportation infrastructure schemes to enhance accessibility within the area. Any future zonings and their impact on traffic congestion will be considered at the relevant plan-making stage and will be subject to transport assessments to ensure better integration of land use planning and transportation. Key Site Requirements will ensure that the need for travel is reduced, sustainable and active forms of transport are encouraged, existing public transport services are considered and efficient road networks are promoted. The Plan Strategy will be accompanied by a Transport Strategy (being prepared by DfI) which will identify currently protected schemes that are to be retained and rolled forward to the Local Policies Plan.	<p>The Council, in accordance with the regional approach provided in the RDS (policy RG2, page 33) and the strategic objectives and implementation of transportation policy set out in the SPPS (page 106 to 110) has carried forward its Preferred Option 22A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective F: A Connected Place, Supporting Sustainable Transport and Other Infrastructure (page 132 – 138);</li> <li>• Strategic Policy SP20 Transportation Infrastructure (page 139 – 143)</li> <li>• Operational Policy TRA4 Protection of New Transport Schemes (page 94)</li> <li>• Operational Policy TRA5 Strategic Greenways and Disused Transport Routes (page 95)</li> <li>• Operational Policy TRA8 Active Travel Networks and Infrastructure Provision (page 97)</li> <li>• Operational Policy TRA9 Park and Ride/Park and Share Car Parks (page 98)</li> </ul> <p>Comments received were supportive of the preferred option and, having regard to its evidence base, the Council has brought forward in its Plan Strategy strategic and operational policies to protect and further enhance key transportation infrastructure to further sustainable travel options. The Council in recognising the value offered by existing infrastructure schemes will further identify opportunities at its Local Policies Plan stage.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 8 – Local Transport Study</li> <li>• Members’ Planning Policy Review Workshop – 30<sup>th</sup> November 2017, 13<sup>th</sup> December 2017, 21<sup>st</sup> February 2019</li> </ul>
<p><i>Q28: Key Issue 23: Retention of Key Park &amp; Ride Sites</i></p>	We welcome the general support for the Preferred Option that a number of key Park & Ride sites will be retained and potential new Park & Ride/Park & Share sites will be identified.	The Council, in accordance with the regional approach provided in the RDS (policy RG2, page 33) and the strategic objectives and implementation of transportation policy set out in the SPPS (page 106 to 110), has carried forward its Preferred Option 23A through to the Spatial Strategy in its dPS taking account of the issues raised.	<ul style="list-style-type: none"> <li>• Technical Supplement 8 – Local Transport Study</li> <li>• Members’ Planning Policy Review Workshop – 30<sup>th</sup> November 2017, 13<sup>th</sup> December 2017; 21<sup>st</sup> February 2019</li> </ul>

<p><i>OPTION 23A - PREFERRED OPTION - Retain a number of key Park &amp; Ride Sites with identification of potential new Park &amp; Ride / Park &amp; Share sites</i></p>	<p>The identification of the new Park &amp; Ride site at Sprucefield will be further considered as part of the Transport Plan process. Expansion of existing Park &amp; Ride locations will be further explored with our consultees through the Transport Plan, Plan Strategy and Local Policies Plan process.</p>	<ul style="list-style-type: none"> <li>• Objective F: A Connected Place, Supporting Sustainable Transport and Other Infrastructure (page 132 – 138);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP20 Transportation Infrastructure (page 139 – 143)</li> <li>• Operational Policy TRA4 Protection of New Transport Schemes (page 94)</li> <li>• Operational Policy TRA9 Park and Ride/Park and Share Car Parks (page 98)</li> </ul> <p>Comments received were supportive of the preferred option and, having regard to its evidence base, the Council has brought forward in its Plan Strategy strategic and operational policies to protect and further enhance key Park &amp; Ride sites to further sustainable travel options. The Council in recognising the value offered by these existing infrastructure schemes will further identify opportunities for new sites at its Local Policies Plan stage.</p>	
<p><i>Q29: Key Issue 24: Promoting Active Travel (walking, cycling and public transport)</i></p> <p><i>OPTION 24A - PREFERRED OPTION - Promote Active Travel in all new development (within Urban Areas / Settlements) to demonstrate how the development integrates with existing public transport, walking and cycling.</i></p>	<p>There was strong support overall for promoting active travel in all new developments and many comments reinforced the necessity that walking and cycling are integrated with public transport to reduce the need to travel by private car.</p>	<p>The Council, in accordance with the strategic objectives and implementation of transportation policy set out in the SPPS (page 106 to 107, paragraph 6.297 and paragraph 6.300) has carried forward its Preferred Option 24A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective F: A Connected Place, Supporting Sustainable Transport and Other Infrastructure (page 132 – 138);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP02 Improving Health and Well-being (page 42)</li> <li>• Strategic Policy SP20 Transportation Infrastructure (page 139 – 143)</li> <li>• Operational Policy HOU4 Design in New Residential Development (page 14 – 18)</li> <li>• Operational Policy TRA4 Protection of New Transport Schemes (page 94)</li> <li>• Operational Policy TRA8 Active Travel Networks and Infrastructure Provision (page 97)</li> </ul> <p>Comments received were supportive of the preferred option and, in line with strategic planning policy, the Council has brought forward in its Plan Strategy strategic and operational policies to promote and enhance active travel in all new developments. The underlining aims of these policies are the promotion of sustainable development whilst improving health and well-being. Active Travel provision must become, and be demonstrated to be a major material consideration for developers in all new housing and employment proposals.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 8 – Local Transport Study</li> <li>• Members’ Planning Policy Review Workshop – 30<sup>th</sup> November 2017, 13<sup>th</sup> December 2017, 21<sup>st</sup> February 2019</li> </ul>
<p><i>Q30: Key Issue 25: Connecting People and Places – Greenways</i></p> <p><i>OPTION 25A - PREFERRED OPTION - Protect and develop safe, shared and accessible Greenways connecting communities, promoting walking and cycling, recreational and social interaction and enhancing health and wellbeing.</i></p>	<p>There was strong support overall for the protection and development of Strategic Greenways with many supporting the segregation of cyclists/pedestrians from road traffic in order to ensure safety.</p>	<p>The Council, in accordance with the regional approach provided in the RDS (policy SFG5, paragraph 3.48, page 58) and the strategic objectives and implementation of transportation policy set out in the SPPS (paragraph 6.210, page 88, paragraph 6.297, page 106 and paragraph 6.300, page 107) has carried forward its Preferred Option 25A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective F: A Connected Place, Supporting Sustainable Transport and Other Infrastructure (page 132 – 138);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP02 Improving Health and Well-being (page 42)</li> <li>• Strategic Policy SP20 Transportation Infrastructure (page 139 – 143)</li> <li>• Operational Policy HOU4 Design in New Residential Development (page 14 – 18)</li> <li>• Operational Policy TRA5 Strategic Greenways and Disused Transport Routes (page 95)</li> <li>• Operational Policy TRA8 Active Travel Networks and Infrastructure Provision (page 97)</li> </ul> <p>Comments received were supportive of the preferred option. The Council has brought forward in its Plan Strategy strategic and operational policies to protect possible and further identify Strategic Greenways to promote sustainable development and the promotion of health and well-being.</p> <p>The Council intends to continue working with Government Departments and neighbouring councils to identify appropriate Strategic Greenway routes in its Local Policies Plan.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 8 – Local Transport Study</li> <li>• Members’ Planning Policy Review Workshop – 30<sup>th</sup> November 2017, 13<sup>th</sup> December 2017, 21<sup>st</sup> February 2019</li> </ul>
<p><i>Q31: Key Issue 26: Renewable Energy</i></p>	<p>We welcome the overall support for the Preferred Option to introduce Areas of</p>	<p>The Council has not carried forward its Preferred Option, as it is considered this is a matter to be fully addressed as part of the Local Policies Plan. The Council proposes at this stage of the Plan</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 6 – Countryside Assessment</li> </ul>

<p><i>OPTION 26A - PREFERRED OPTION - Introduce Areas of Constraint in relation to renewable development (wind turbines)</i></p>	<p>Constraint in relation to renewable development (wind turbines). It is considered that this approach is in line with the SPPS and regional policy and reflects the need to protect our unique and diverse landscapes within the Council area.</p>	<p>process, to retain the existing policy-led approach (in accordance with Option 26B) in relation to renewable energy development through to the Spatial Strategy, taking account of the issues raised. This remains in accordance with the regional approach provided in the RDS (policy RG5, page 36 and policy RG9, page 43 to 45) and the strategic objectives and implementation of policy set out in the SPPS (page 90 to page 92).</p> <ul style="list-style-type: none"> <li>Objective F: A Connected Place, Supporting Sustainable Transport and Other Infrastructure (page 132 and page 145);</li> <li>Strategic Policy SP01 Sustainable Development (page 42)</li> <li>Strategic Policy SP21 Renewable Energy (page 146)</li> <li>Operational Policy RE1 Renewable Energy Development (page 100)</li> </ul> <p>Areas of Constraint for wind turbines is a matter the Council will give further consideration to at its Local Policies Plan stage.</p>	<ul style="list-style-type: none"> <li>Members' Planning Policy Review Workshop – 30<sup>th</sup> November 2017, 13<sup>th</sup> December 2017, 21<sup>st</sup> February 2019</li> </ul>
<p><i>Q32: Key Issue 27: Telecommunications</i></p> <p><i>OPTION 27A - PREFERRED OPTION - Retain the existing policy-led approach in relation to telecommunications development.</i></p>	<p>We welcome the support for the Preferred Option to retain the existing policy-led approach in relation to telecommunication development. The details of the retained policy will be further developed during the policy review stage as part of the Plan Strategy.</p>	<p>The Council, in accordance with the regional approach provided in the RDS (policy RG3, page 34 to page 35) and the strategic objectives and policy set out in the SPPS (page 94 to page 95) has carried forward its Preferred Option 27A through to the Spatial Strategy in its dPS.</p> <ul style="list-style-type: none"> <li>Objective F: A Connected Place, Supporting Sustainable Transport and Other Infrastructure (page 147 – 148);</li> <li>Strategic Policy SP01 Sustainable Development (page 42)</li> <li>Strategic Policy SP22 Telecommunications and Other Utilities (page 149 - 150)</li> <li>Operational Policy TEL1 Telecommunications Development (page 102 – 103)</li> </ul> <p>Comments received were supportive of retaining the existing policy approach. The strategic and operational policies of the Plan Strategy have transcribed existing telecommunications policy so as to remain effective in considering development proposals of this nature.</p>	<ul style="list-style-type: none"> <li>Position Paper 6 – Telecommunications, Public Services and Utilities</li> <li>Members' Planning Policy Review Workshop – 30<sup>th</sup> November 2017, 13<sup>th</sup> December 2017, 21<sup>st</sup> February 2019</li> </ul>
<p><i>Q33: Key Issue 28: Waste Management</i></p> <p><i>OPTION 28A - PREFERRED OPTION - Retain the existing policy-led approach in relation to waste management within the Council area.</i></p>	<p>We welcome the support for the Preferred Option to retain the existing policy-led approach in relation to waste management within the Council area. The Council will continue to promote a sustainable approach to waste management to reduce the amount of waste going to landfill. Available capacity at waste water treatment works will be identified through discussions with our statutory consultees as we move towards the Plan Strategy.</p>	<p>The Council, in accordance with the regional approach provided in the RDS (policy RG10, page 47) and the strategic objectives and policy set out in the SPPS (page 111 to page 113) has carried forward its Preferred Option 28A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>Objective F: A Connected Place, Supporting Sustainable Transport and Other Infrastructure (page 151 – 153);</li> <li>Strategic Policy SP01 Sustainable Development (page 42)</li> <li>Strategic Policy SP23 Waste Management (page 154)</li> <li>Operational Policy WM1 Waste Management Facilities (page 105 – 106)</li> <li>Operational Policy WM2 Treatment of Waste Water (page 107)</li> <li>Operational Policy WM3 Waste Disposal (page 108)</li> <li>Operational Policy WM4 Land Improvement (page 108 - 109)</li> <li>Operational Policy WM5 Development in the Vicinity of Waste Management or Wastewater Treatment Works (page 109)</li> </ul> <p>Comments received were supportive of the preferred option. The Council will continue to engage with statutory stakeholders and neighbouring councils (Arc 21) to promote more sustainable waste management policies with the aim of minimising amounts deposited to landfill.</p>	<ul style="list-style-type: none"> <li>Position Paper 6 – Telecommunications, Public Services and Utilities</li> <li>Members' Planning Policy Review Workshop – 30<sup>th</sup> November 2017, 13<sup>th</sup> December 2017, 21<sup>st</sup> February 2019</li> </ul>
<p><i>Q34: Key Issue 29: Protecting and Enhancing Built Heritage Assets and Archaeological Remains</i></p> <p><i>OPTION 29A - PREFERRED OPTION - Retain the existing policy-led</i></p>	<p>The responses received for this Key Issue were largely in favour of the Preferred Option. Comments were mostly favourable, with added protection for our built heritage a recurring theme.</p>	<p>The Council, in accordance with the regional approach provided in the RDS (policy RG11, page 47 to page 48) and the strategic objectives and policy set out in the SPPS (page 37 to page 42) has carried forward its Preferred Option 29A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>Objective E: A Green Place, Protecting and Enhancing the Historic and Natural Environment (page 122 – 123);</li> <li>Strategic Policy SP01 Sustainable Development (page 42)</li> </ul>	<ul style="list-style-type: none"> <li>Technical Supplement 6 – Countryside Assessment</li> <li>Members' Planning Policy Review Workshop – 30<sup>th</sup> November 2017, 13<sup>th</sup> December 2017, 28<sup>th</sup> February 2019</li> </ul>

<p><i>approach with regards to the protection and enhancement of Built Heritage Assets but in addition provide opportunity to identify potential new Conservation Areas, Areas of Townscape Character or Areas of Village Character throughout the Council area.</i></p>		<ul style="list-style-type: none"> <li>• Strategic Policy SP18 Protecting and Enhancing the Historic Environment and Archaeological Remains (page 124 – 125)</li> <li>• Operational Policy HE1 The Preservation of Archaeological Remains of Regional Importance and their Settings (page 74)</li> <li>• Operational Policy HE2 The Preservation of Archaeological Remains of Local Importance and their Settings (page 74)</li> <li>• Operational Policy HE3 Archaeological Assessment and Evaluation (page 75)</li> <li>• Operational Policy HE4 Archaeological Mitigation (page 75)</li> <li>• Operational Policy HE5 Historic Parks, Gardens and Demesnes of Special Historic Interest (page 76)</li> <li>• Operational Policy HE6 Change of Use and/or Extensions or Alterations to a Listed Building (page 77)</li> <li>• Operational Policy HE7 Control of Advertisements on a Listed Building (page 78)</li> <li>• Operational Policy HE8 Demolition or Partial Demolition of a Listed Building (page 78)</li> <li>• Operational Policy HE9 Development affecting the Setting of a Listed Building (page 79)</li> <li>• Operational Policy HE10 New Development in a Conservation Area or Area of Townscape Character/Area of Village Character (page 80)</li> <li>• Operational Policy HE11 The Control of Advertisements in a Conservation Area or Area of Townscape Character/Area of Village Character (page 82)</li> <li>• Operational Policy HE12 Demolition or Partial Demolition in a Conservation Area or Area of Townscape Character/Area of Village Character (page 82)</li> <li>• Operational Policy HE13 The Conversion and Reuse of Non-Listed Buildings (page 83)</li> <li>• Operational Policy HE14 Enabling Development (page 84)</li> </ul> <p>Comments received were supportive of the preferred option and work on furthering protection for our Built Heritage will be considered when a review of Conservation Areas, Areas of Townscape and Areas of Village Character is undertaken as part of the Local Policies Plan.</p>	
<p><i>Q35: Key Issue 30: Protecting and Enhancing Natural Heritage Assets</i></p> <p><i>OPTION 30A - PREFERRED OPTION - Retain the existing policy-led approach with regards to the protection and enhancement of Natural Heritage Assets but in addition provide opportunity to identify potential new environmental designations across the Council area.</i></p>	<p>There was strong overall support for the Preferred Option and many comments reinforced the necessity to retain the existing policy approach.</p>	<p>The Council, in accordance with the regional approach provided in the RDS (policy RG11, page 49 to page 50) and the strategic objectives and policy set out in the SPPS (page 80 to page 81) has carried forward its Preferred Option 30A through to the Spatial Strategy in its dPS taking account of the issues raised.</p> <ul style="list-style-type: none"> <li>• Objective E: A Green Place, Protecting and Enhancing the Historic and Natural Environment (page 126);</li> <li>• Strategic Policy SP01 Sustainable Development (page 42)</li> <li>• Strategic Policy SP19 Protecting and Enhancing Natural Heritage (page 127 – 129)</li> <li>• Operational Policy NH1 European and Ramsar Sites – International (page 85)</li> <li>• Operational Policy NH2 Species Protected by Law (page 86)</li> <li>• Operational Policy NH3 Sites of Nature Conservation Importance - National (page 86)</li> <li>• Operational Policy NH4 Sites of Nature Conservation Importance - Local (page 87)</li> <li>• Operational Policy NH5 Habitats, Species or Features of Natural Heritage Importance (page 88)</li> <li>• Operational Policy NH6 Areas of Outstanding Natural Beauty (page 88)</li> </ul> <p>Comments received were supportive of retaining the existing policy approach, the strategic and operational policies of the Plan Strategy have transcribed existing policy to remain effective.</p>	<ul style="list-style-type: none"> <li>• Technical Supplement 6 – Countryside Assessment</li> <li>• Members’ Planning Policy Review Workshop – 30<sup>th</sup> November 2017, 13<sup>th</sup> December 2017, 28<sup>th</sup> February 2019</li> </ul>

**Appendix C: List of Technical Supplements Accompanying the Plan Strategy**

Technical Supplement 1 – Housing Growth Study

Technical Supplement 2 – Urban Capacity Study

Technical Supplement 3 – Employment Land Review

Technical Supplement 4 – Office Capacity Study

Technical Supplement 5 – Retail Capacity Study

Technical Supplement 6 – Countryside Assessment

Technical Supplement 7 – Open Space, Sport and Outdoor Recreation

Technical Supplement 8 – Local Transport Study (LTS)

## Appendix D: Feedback from Drop-In Sessions

District Electoral Area	<b>Castlereagh East</b>
Date of Drop-In Session	24 October 2019
Time of Drop-In Session	2:00pm – 4:00pm and 6:00pm – 8:00pm
Location	The Minor Hall, Enler Centre, Dundonald

<b>Issues Raised</b>
<p><u>Millmount Village Issues</u></p> <p>A Planning Agent advised they had held a public meeting recently, stating their intention to build homes on a strip of land set aside for a new road.</p> <p>Residents concerned about traffic issues on Upper Newtownards Road i.e. issues with turning right onto the Newtownards Road from Millmount.</p> <p>Concerns expressed over piecemeal development and the potential 1000 new houses in the last phase of Millmount with no infrastructure.</p> <p>Concerns regarding roads through Millmount are currently substandard and the development is currently one way in, one way out.</p>
<p><u>Education</u></p> <p>Concern raised regarding nothing in dPS about education (NB: public advised of SP10 Education, Health, Community and Culture and supporting operational policies)</p> <p>The Council advised residents about having engaged with the Education Authority who say that there is availability in schools over the Plan period.</p> <p>There has been a need identified in the Dundonald/Castlereagh area, although EA advise a new school is likely to be the last option.</p> <p>CLlr Gregg confirmed he had spoken to Translink about traffic issues specifically relating to schools.</p> <p>Concerns expressed over a need for a wider review of traffic in Dundonald in conjunction with Translink/TNI.</p>
<p><u>Renewables</u></p> <p>One member of the public was interested in our renewable energy policy and supportive of this.</p>
<p><u>Planning Conditions</u></p> <p>Some debate on the enforceability of planning conditions. The Council gives permission with conditions outlined which are expected to be met otherwise the developer carries the risk of carrying out unauthorised works.</p> <p>Some stated that enforcement should be more active as developers promise facilities in housing developments and they never happen.</p>

Have Your Say

Strategic and Operational Policies were explained. Members of the public were advised on how to make representations and the counter-representations. The Independent Examination process was also explained.

Dundonald Identity

A request was put forward to make Dundonald a town with its own identity.

Park & Ride Facilities

Some residents state there is demand for Park and Ride near Newtownards (with talk of the old Rolls Royce site being made a Park and Ride). The Park and Ride site for the Glider has potential for a community function/facility.

Waste Disposal

A waste disposal or recycling site is needed in Dundonald.

Planning Presumption

The presumption in favour of development should be taken out of planning policy.

Greenbelt/ Green Wedges

Dundonald Greenbelt Association would like to see the existing green wedges merged all around Dundonald. They would also like to see a town centre or urban village designation. Issues were expressed regarding windfall potential, because this is unplanned for it is not easy to predict.

Open Space

Comment made that it is important to keep the existing open space in Ballybeen.

Archaeology

Comment made that important archaeology on land to the east side of Dundonald should be protected.

Housing in the Countryside

A member of the public wished to know if he could get a house in the countryside. He was directed to the existing policy, including the SPPS and its criteria for a dwelling in the countryside, and advised on the operational policy in the draft Plan Strategy.

District Electoral Area	<b>Castlereagh South</b>
Date of Drop-In Session	6 November 2019
Time of Drop-In Session	2:00pm – 4:00pm and 6:00pm – 8:00pm
Location	Lough Moss Leisure Centre, Carryduff

<b>Issues Raised</b>
<p><u>Boardmills</u></p> <p>Resident asked will this settlement be allowed to grow</p> <p>Local need for new housing, including social housing identified in the surrounding countryside.</p>
<p><u>Settlement Development Limits</u></p> <p>Resident asked if settlement development limits had changed. Advised that they remained as per BMAP – only identified change are the West Lisburn/Blaris lands, changing from employment to Strategic Mixed Use.</p>
<p><u>Ballymaconaghy Road/Saintfield Road Issues</u></p> <p>Concerns expressed over traffic issues in the area. People use Ballymaconaghy Road and other nearby roads to get around the traffic on the Saintfield Road. Traffic issues need to be addressed before it gets to Carryduff/Castlereagh.</p> <p>The Council advised that TNI/Translink/neighbouring councils have been consulted on this matter and possible solutions discussed including a Park &amp; Ride in Carryduff, which according to Translink is unlikely to materialise.</p>
<p><u>Protected Routes</u></p> <p>A member of the public was interested in Policy TRA3 – Access to Protected Routes and how strips of land should be protected along Class A and B roads in order to future proof development.</p>
<p><u>Site Specific Query (Sprucefield/Ravernet)</u></p> <p>An individual requested the possibility of lands for inclusion close to Sprucefield. They were advised that the Council will consider reps on land brought forward for development on the basis of soundness.</p>
<p><u>General Housing/Traffic Concerns</u></p> <p>There was a general District Electoral Area query as to whether there would be any more housing approved which would exacerbate existing issues. The individual was advised that while there will be more approved housing built on zoned sites, the dPS is currently not proposing to zone any further land at draft Plan Strategy.</p>



Businesses

A local haulage business enquired about the state of employment and industry in the Council area. They were advised that around half of the zoned land has been taken up and that the dPS encourages growth in the rural as well as the urban area in appropriate locations.

Farming

Several farmers asked about the potential changes to rural housing policy. They were advised that the policy supports active farmers and gives clear policy and guidance on what is/isn't acceptable in terms of planning applications.

Site Specific Query (Land adjacent to Carryduff Settlement Limit)

An individual stated they would like to have land included in the settlement limit on lands to the rear of an existing housing zoning in BMAP. Another individual stated they would also like land included in the settlement limit at a specified location. They were advised that the Council will consider reps on land brought forward for development on the basis of soundness.

Open Space/Recreation Carryduff

An individual gave support to protecting open space, greenways and improving recreational needs for Carryduff.

Air Quality/Traffic/Design of Housing

An individual supported a Park and Ride further outside Carryduff to stop traffic driving through Carryduff and acknowledged that the new Urby Bus service is a good service. Also expressed the desire to have policy which would mean no chimneys in new housing design to improve air quality. Suggested Carryduff should be designated a smoke free zone.

Carryduff Town Centre

A number of individuals would like to see improvements to the town centre and what is happening with it.

Traffic Speed

Two residents expressed concerns about traffic speed on the country roads leading into Carryduff. An individual asked about the Four Winds roundabout and traffic upgrades. There was a general consensus for traffic alleviation measures during peak periods.

Carryduff Greenway

An individual stated they would like the dPS to show the proposed Carryduff Greenway on a map.

Development in the Countryside

An individual expressed concern that there should be no further development into the countryside, outside the settlement limits.

Major Employment Location Knockbracken

Two individuals asked about the Major Employment Location (MEL) at Knockbracken and about future business, housing, protection of the listed buildings and what will happen to the existing allotments.

District Electoral Area	<b>Downshire East</b>
Date of Drop-In Session	14 November 2019
Time of Drop-In Session	2:00pm – 4:00pm and 6:00pm – 8:00pm
Location	Lagan Valley Island, Lisburn

<b>Issues Raised</b>
<p><u>Drumbeg Traffic Issues and Open Space</u></p> <p>A number of individuals including representatives from Drumbeg Women’s Institute raised transport issues in Drumbeg, including the B103 and Quarterlands Road. These issues included the need for a footpath, speed limit signs, traffic calming measures for road safety and road cleaning. Traffic lights are necessary at Wolfenden Bridge at Lambeg Church.</p> <p>They also expressed concern for better links to open space and a children’s playground.</p>
<p><u>Park and Ride/Car Parking</u></p> <p>An individual had queries about Park &amp; Ride locations at Sprucefield and at the Railway Station in Lisburn (querying whether it was it going to be extended). Comments also made about Hillsborough Forest car parking charges. The individual was advised that the proposed Rail Halt at Knockmore proposes a Park and Ride and that there is currently no plans to extend Park and Ride facilities at Lisburn Railway Station.</p>
<p><u>Feumore</u></p> <p>Individual residents from Feumore expressed concerns over the amount / style of new housing within the small settlement. They stated concerns that given the environmental designations around the small settlement BMAP included a lot of land within its development limits. They were advised how to make a representation to the Plan Strategy.</p>
<p><u>West Lisburn/Plantation Area</u></p> <p>Two individuals wanted to see any development proposals for West Lisburn as they advised they owned lands in the Plantation area. They were advised of the Council’s Strategic Mixed Use Site at West Lisburn/Blaris SMU01.</p>

District Electoral Area	<b>Downshire West</b>
Date of Drop-In Session	19 November 2019
Time of Drop-In Session	2:00pm – 4:00pm and 6:00pm – 8:00pm
Location	Hillsborough Village Centre, Hillsborough

<b>Issues Raised</b>
<p><u>Traffic Problems in Hillsborough/Parking</u></p> <p>Most queries focussed on traffic and transport issued through the town and congestion.</p> <p>Concerns were expressed regarding parking, and that in general there was not enough parking.</p> <p>Some individuals stated there were problems around the school with parking and concerns around changes of use in Main St and Lisburn St from residential to other uses – querying what percentage was appropriate in terms of achieving the balance.</p> <p>A representative from Hillsborough Resident’s association said that parking on kerbs is not enforced, which leaves it difficult for those in wheelchairs, parents with prams etc; request for additional parking.</p>
<p><u>Housing</u></p> <p>Discussion took place around housing approvals within Hillsborough and developers not complying with Key Site Requirements (KSRs).</p> <p>Concerns raised over masterplans for larger residential sites and planning not enforcing them when sites are developed in piecemeal way.</p> <p>General queries regarding housing and growth.</p> <p>Representatives from Hillsborough Resident’s association expressed concerns over some of the recent planning approvals, for example housing on Dromore Road at entrance to Hillsborough.</p> <p>Views also raised regarding capacity of water/sewerage infrastructure should housing be acceptable.</p> <p>Query regarding policy on affordable housing and practicalities e.g. if off-set.</p>
<p><u>Conservation</u></p> <p>Comments were made on Conservation area status and importance of renewing the out of date Conservation Area Guide.</p>

District Electoral Area	<b>Killultagh</b>
Date of Drop-In Session	27 November 2019
Time of Drop-In Session	2:00pm – 4:00pm and 6:00pm – 8:00pm
Location	Maghaberry Community Centre, Maghaberry

<b>Issues Raised</b>
<p><u>Site Specific Queries (Land for Housing/ Schools)</u></p> <p>Two individuals stated they would like to have land included within the settlement development limit at Beanstown and Glenavy Roads in Lisburn. They also asked if there are any plans for schools in the area due to the substantial new housing.</p> <p>The housing figures from the Plan Strategy were explained including the proposed mixed zoning at West Lisburn and discussion about general issues around Lisburn such as roads, Park and Ride etc.</p> <p>They were advised that the Council will consider reps on land brought forward for development on the basis of soundness.</p>
<p><u>Transportation Issues/Strategic Roads</u></p> <p>Queries regarding Strategic roads – Knockmore Link Road/Pond Park Road – when will they be built</p> <p>Queries regarding Active travel and whether there was a policy on this. They were advised about the Council’s Greenways, including the proposed strategic greenway and linear park at West Lisburn/Blaris lands.</p>
<p><u>Blaris Lands/Flooding</u></p> <p>An individual requested an overview of plan – what were the main issues – how will the zoning at West Lisburn/Blaris help the Council area?</p> <p>Concern expressed over flooding – Blaris is within a floodplain and it all cannot be built on (advised of key site requirement for linear park around the edges of floodplain)?</p>
<p><u>Retailing</u></p> <p>Comments were made in relation to Lisburn Town Centre/Sprucefield (the previous John Lewis application referred to).</p>
<p><u>Minerals Development</u></p> <p>Discussion on Lough Neagh and the sand extraction.</p> <p>Comments made in relation to the importance of geology and Mineral development.</p>
<p><u>Renewable Energy</u></p> <p>Query regarding whether there was a policy on this They were advised of SP21 Renewable Energy and related operational policy.</p>

District Electoral Area	<b>Lisburn North</b>
Date of Drop-In Session	4 December 2019
Time of Drop-In Session	2:00pm – 4:00pm and 6:00pm – 8:00pm
Location	Bridge Community Centre, Lisburn

<b>Issues Raised</b>
<p><u>Waste Management Facilities</u></p> <p>Representative from Whitemountain and District Community Association raised general issues about the provision of waste facilities at existing sites at the top of Whitemountain Road.</p> <p>General discussion on matters raised by individual into the decision of the former DoE to grant approval for waste facilities in this area given it forms part of the Belfast Basalt Escarpment and a designated Area of High Scenic Value within the existing BMAP. Discussion on this matter moved on to the replacement of BMAP and what the Council proposed in its draft Plan Strategy.</p> <p>The individual was provided with a copy of the dPS (Parts 1 and 2) and advised of the strategic and operational policies relating to waste management.</p> <p>Further minor matters raised as to the extent of designated sites within the vicinity of Whitemountain and Stoneyford and how these were to be addressed by the dPS.</p> <p>Individual advised that these fall under local designations and would not be a consideration until Local Plan Policies stage.</p>

District Electoral Area	<b>Lisburn South</b>
Date of Drop-In Session	11 December 2019
Time of Drop-In Session	2:00pm – 4:00pm and 6:00pm – 8:00pm
Location	Ballymacash Community Centre, Lisburn

<b>Issues Raised</b>
<p><u>Site Specific Query (Carrowreagh, Dundonald)</u></p> <p>An individual discussed industrial zoning, specifically in Carrowreagh (Dundonald). They stated the industrial zoning north of the Enterprise Business Park has not been taken up and has accessibility/landform issues. They were advised to look at the dPS Technical Supplements including the Employment Land Review and also Housing Growth Study. The individual was advised that the dPS contains housing figures that are felt to be adequate for the duration of the Plan and that any representation should be based on the tests for soundness.</p>
<p><u>Site Specific Query (Milltown)</u></p> <p>An individual stated they wanted to have land included within the Settlement/Development of Milltown.</p> <p>They were advised that the Council will consider reps on land brought forward for development on the basis of soundness.</p>
<p><u>Transport Issues</u></p> <p>An individual discussed transport issues in general within the Council area and how better connections could be made with the right level of investment.</p>

## Appendix E Summary Leaflet

Summary  
Leaflet

# Local Development Plan 2032

## Draft Plan Strategy

October 2019



# Local Development Plan 2032

## Draft Plan Strategy

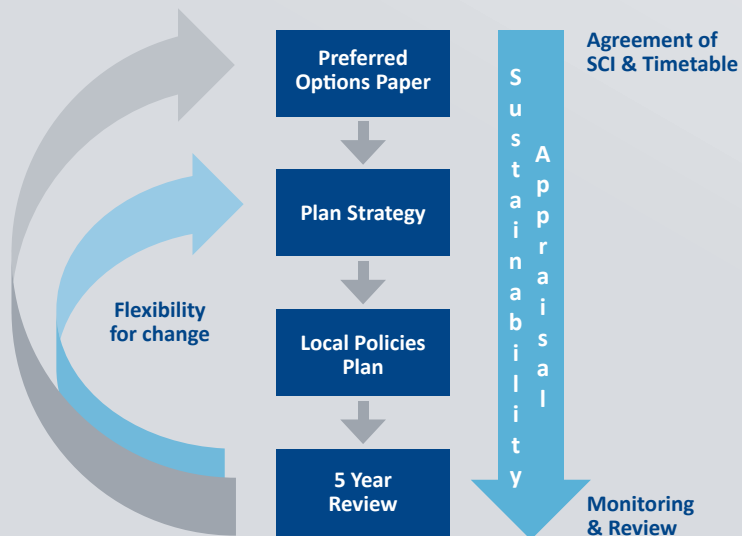
The **draft Plan Strategy** is the first document in a two-stage process, the second being the Local Policies Plan. Together these will constitute the Council's new **Local Development Plan (LDP)**. It follows the publication of the Preferred Options Paper on 30th March 2017.

The draft Plan Strategy takes account of the particular characteristics of our district and the views of our residents, Council members and key consultees. It provides the statutory policy framework for the future development of the Council area from 2017-2032 aligned with the Council's Community Plan.

The draft Plan Strategy sets out how the area will develop and grow over the period up to 2032.

### How We Got Here

The Council in accordance with relevant legislation and regional guidance is preparing its Local Development Plan in four stages shown in the figure below.



Responses received to the public consultation on the Preferred Options Paper were considered in conjunction with a comprehensive evidence base, comprising of specialist studies, that together have shaped the draft Plan Strategy. These have been important in developing the strategic and operational policies contained within the Plan Strategy.

### Policy and Spatial Context

The draft Plan Strategy provides the strategic policy framework across a range of areas such as housing, employment, tourism and infrastructure. It takes account of the 'Regional Development Strategy 2035' (RDS), the Strategic Planning Policy Statement (SPPS) and other advice and guidance issued by the Northern Ireland Government.

Lisburn & Castlereagh City Council area stretches from the shores of Lough Neagh in the west to the Castlereagh Hills rising above Dundonald in the east and from the Belfast Hills in the north to the source of the Lagan in the south. The Council area covers an area of almost 200 square miles (520 square km).

The Council is strategically located at the junction of two key transport corridors running East-West across Northern Ireland and along the major North-South, Belfast to Dublin economic corridor. There are also easily accessible links to the two major airports and ferry ports.

Due to its geographical location it is at the centre of five neighbouring council areas, consisting of Belfast City Council; Armagh City, Banbridge and Craigavon Borough Council; Antrim and Newtownabbey Borough Council; Ards and North Down Borough Council; and Newry, Mourne and Down District Council.

The Council area has a diverse mix of both urban and rural areas with the main centre being Lisburn City located at the heart of the Council's urban area. The landscape is diverse in nature ranging from the lowlands of the Lagan Valley Regional Park to the uplands to the north and south.

## The LDP Vision

The Local Development Plan (LDP) will respond to the needs of the community in providing a sustainable economy, society and environment. It will support a thriving, vibrant and connected place in which people live, work, visit and invest; and an attractive, green and quality place which will enhance the wellbeing and quality of life for all.



The draft Plan Strategy is set out as follows:

## Part 1 – Plan Strategy:

- **Chapter 1 Introduction** – outlines the background and purpose.
- **Chapter 2 Policy and Spatial Context** – provides detail on the policy framework and profile of the Council area.
- **Chapter 3 Vision and Plan Objectives** – sets out the Local Development Plan (LDP) vision and objectives which drive its delivery.
- **Chapter 4 Strategic Policies and Spatial Strategy** – provides the strategic policies for the LDP for implementation of the following objectives:

A

### A Quality Place

Enabling Sustainable Communities and Delivery of New Homes

B

### A Thriving Place

Driving Sustainable Economic Growth

C

### A Vibrant Place

Growing our City, Town Centres, Retailing and Other Uses

D

### An Attractive Place

Promoting Sustainable Tourism, Open Space, Sport and Outdoor Recreation

E

### A Green Place

Protecting and Enhancing the Historic and Natural Environment

F

### A Connected Place

Supporting Transport and Other Infrastructure

- **Chapter 5 Monitoring and Implementation** – sets out how we will measure the effectiveness of the LDP.

## Part 2 – Operational Policies:

- **Preamble** - provides the context for operational policies including how all policies must be considered.
- **Topic-based operational policies** - these will guide development across the Council area. Policies are grouped under the six objectives identified under the Spatial Strategy.

## Supporting Documents

The Plan Strategy is accompanied by:

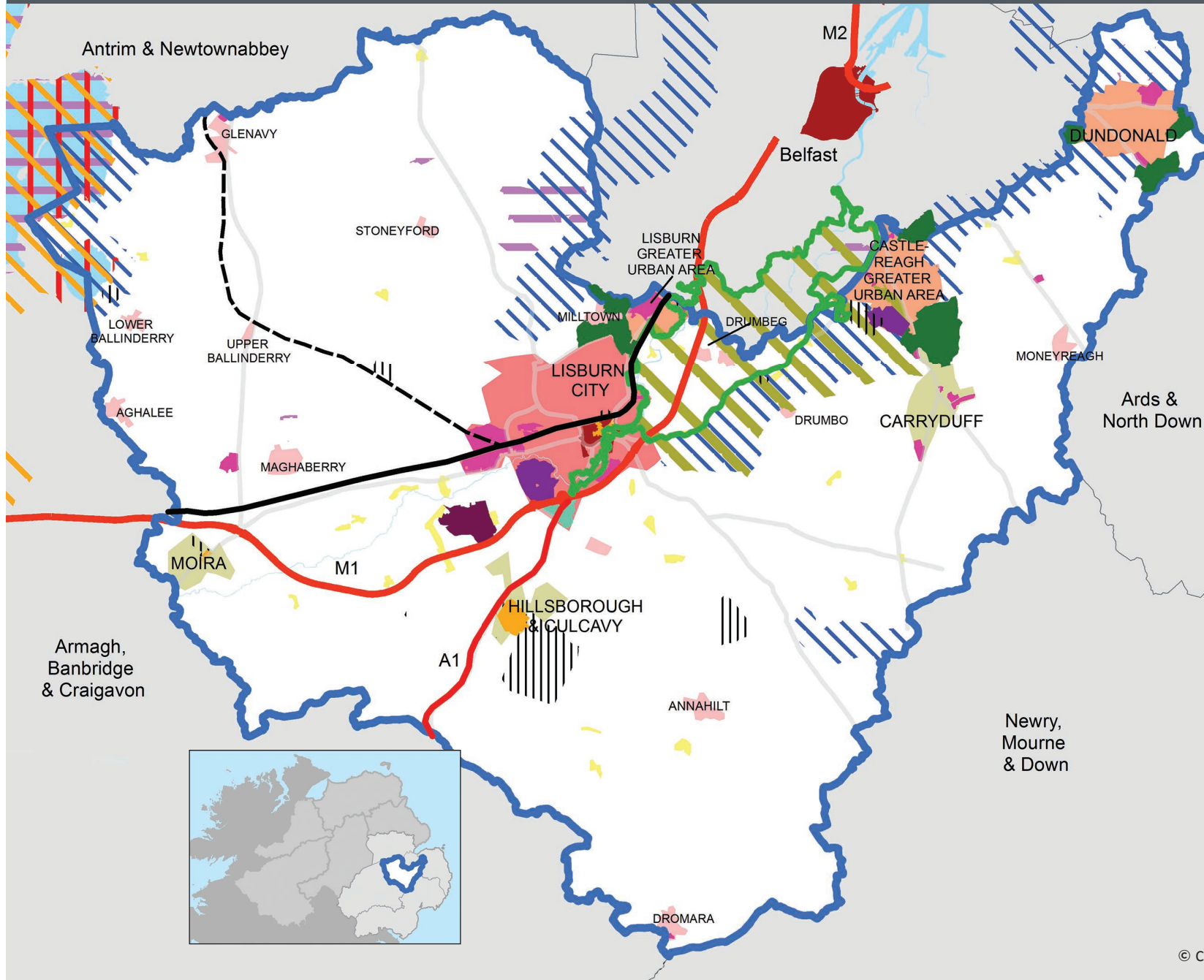
- **Sustainability Appraisal**
- **Habitats Regulations Assessment**
- **Rural Needs Impact Assessment**
- **Equality Impact Screening Report.**

Additional supporting documents include:

- **Technical Supplements** – The Plan Strategy is underpinned by a robust evidence base which will be reviewed periodically to inform the future Local Policies Plan. The policies and proposals contained within the Plan Strategy are informed by and assessed against relevant available evidence.
- **Supplementary Planning Guidance (SPG)** – comprising of guidance to be used in conjunction with the Plan Strategy.



# SPATIAL STRATEGY AT A GLANCE



## Spatial Strategy Lisburn & Castlereagh City Council



### Key

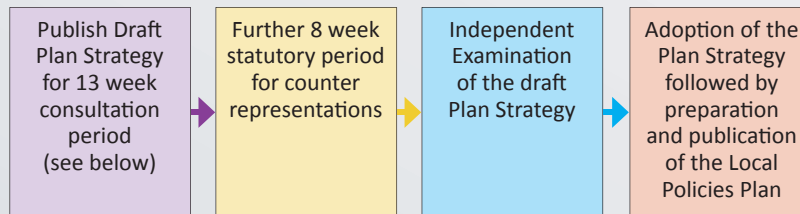
- LCCC Boundary
- City
- Greater Urban Area
- Town
- Village
- Small Settlement
- Strategic Mixed Use
- Employment
- Sprucefield
- Maze Strategic Land
- City Centre
- Neighbouring LGDs
- Protected Route
- Transport Corridor
- Railway Line
- Disused Railway
- Ramsar Site
- Special Protected Area
- Area of Special Scientific Interest
- Area of Outstanding Natural Beauty
- Historic Park, Garden & Demesne
- Area of High Scenic Value
- Lagan Valley Regional Park
- Landscape Wedge
- Conservation Area
- Water



0 1 2 4 Kilometres

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## Where we are now



## When and how to make a Representation

### Pre-Consultation

To allow further time for consideration of the document, we are publishing it in advance of the formal (statutory) eight week period of public consultation. **This period of pre-consultation will run from Friday 11th October 2019 to Thursday 7th November 2019.** Please note that no representations should be made within this period as they will not be considered outside the formal consultation period.

### Formal Consultation

The draft Plan Strategy will be **published for formal consultation on Friday 8th November 2019 closing at 5pm on Friday 10th January 2020.** Please note that representations received after the closing date on 10th January 2020 will not be considered.

You may make a representation during the formal consultation period in any of the following ways:

- **Online** – use online representation form available at [www.lisburncastlereagh.gov.uk/LDP](http://www.lisburncastlereagh.gov.uk/LDP)
- **Email** – email us at [LDP@lisburncastlereagh.gov.uk](mailto:LDP@lisburncastlereagh.gov.uk)
- **In writing** – Local Development Plan Team, Civic Headquarters, Lagan Valley Island, Lisburn, BT27 4RL

When telling us of any changes that should be made to the Plan Strategy to make it more sound, you must take into account the tests of soundness. Please indicate if you would like your representation to be dealt with as a written or oral representation.

## Your views – Soundness

In accordance with the new Local Development Plan system, it is important that your representations and counter-representations engage with the 12 tests of soundness, which refer to the process by which the draft Plan Strategy was prepared.

### Procedural Tests

- P1** Has the Development Plan Document (DPD) been prepared in accordance with the Council's timetable and Statement of Community Involvement?
- P2** Has the Council prepared its Preferred Options Paper and taken account of any representations made?
- P3** Has the DPD been subject to a sustainability appraisal including a Strategic Environmental Assessment?
- P4** Did the Council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?

### Consistency Tests

- C1** Did the Council take account of the Regional Development Strategy?
- C2** Did the Council take account of its Community Plan?
- C3** Did the Council take account of policy and guidance issued by the Department?
- C4** Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining Council's district?

### Coherence and Effectiveness Tests

- CE1** The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross-boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;
- CE2** The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;
- CE3** There are clear mechanisms for implementation and monitoring; and
- CE4** It is reasonably flexible to enable it to deal with changing circumstances.

Further information on the soundness of a Local Development Plan and how to test the soundness of the Plan can be found in the Department for Infrastructure's publication Development Plan Practice Note 06, [www.infrastructure-ni.gov.uk](http://www.infrastructure-ni.gov.uk).

Following receipt of comments regarding the soundness of the draft Plan Strategy, a further 8 week period will be allowed for receipt of counter-representations. The Council will then publish both sets of representations and a submission shall be made to the Department for Infrastructure to cause an Independent Examination to be held.

### Consultation Events

A number of informal drop-in sessions have been organised, details of which are set out below. Drop-in sessions will be staffed by members of the Local Development Plan team who will be happy to answer any queries you may have in an informal setting regarding the draft Plan Strategy.

DATE	LOCATION	TIME
<b>Castlereagh East</b>		
24 October 2019	The Minor Hall Enler Centre 9 Craigleith Drive Dundonald BT16 2QP	2.00pm to 4.00pm
		6.00pm to 8.00pm
<b>Castlereagh South</b>		
6 November 2019	The Mezzanine Room Lough Moss Leisure Centre Hillsborough Road Carryduff BT8 8HR	2.00pm to 4.00pm
		6.00pm to 8.00pm
<b>Downshire East</b>		
14 November 2019	The Oak Room Lagan Valley Island Lisburn BT27 4RL	2.00pm to 4.00pm
		6.00pm to 8.00pm
<b>Downshire West</b>		
19 November 2019	Hillsborough Village Centre 7 Ballynahinch Road Hillsborough BT26 6AR	2.00pm to 4.00pm
		6.00pm to 8.00pm
<b>Killultagh</b>		
27 November 2019	Maghaberry Community Centre Maghaberry Road Maghaberry Craigavon BT67 0JG	2.00pm to 4.00pm
		6.00pm to 8.00pm
<b>Lisburn North</b>		
4 December 2019	Bridge Community Centre 50 Railway Street Lisburn BT28 1XP	2.00pm to 4.00pm
		6.00pm to 8.00pm
<b>Lisburn South</b>		
11 December 2019	Ballymacash Community Centre 29 Rathvarna Drive Lisburn BT28 2UB	2.00pm to 4.00pm
		6.00pm to 8.00pm





## Availability of Documents

The draft Plan Strategy will be publicly available and published on the Council's website from Friday 11 October 2019.

The supporting documents including a Sustainability Appraisal incorporating Strategic Environmental Assessment, draft Habitats Regulations Assessment, Section 75 Equality Impact Screening and Rural Needs Impact Assessment and 8 Technical Supplements will only be publicly available from the start of the statutory consultation period on 8 November 2019.

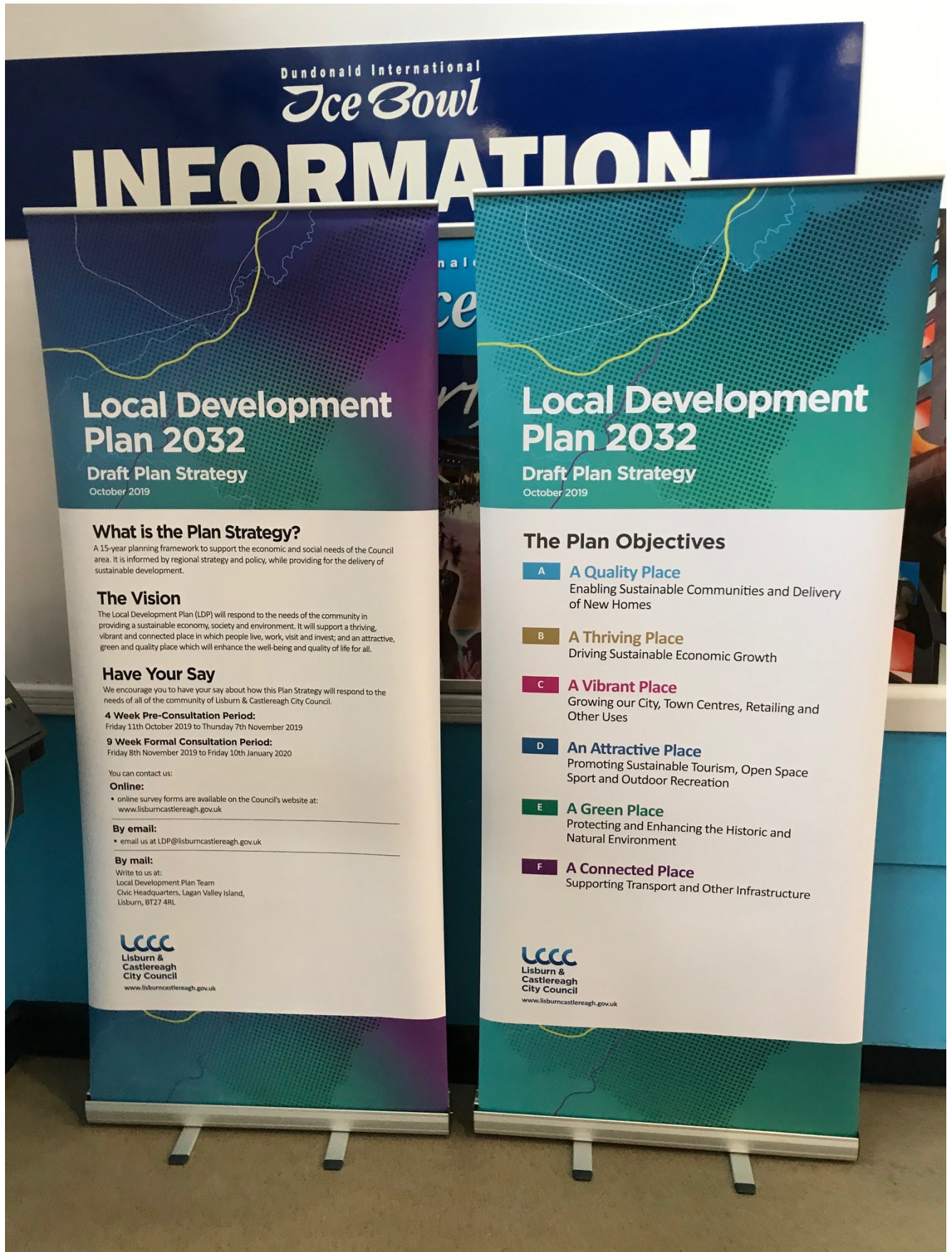
These will also be published on the Council's website at [www.lisburncastlereagh.gov.uk/LDP](http://www.lisburncastlereagh.gov.uk/LDP)

All documentation will be freely downloadable.

These documents will be available for inspection between the hours of 9.00 am – 5.00 pm, from Monday to Friday at: Local Development Plan Team, Civic Headquarters, Lagan Valley Island, Lisburn, BT27 4RL



**Appendix F: Pull-Up Display Panels (at Dundonald International Ice Bowl, Lisburn Irish Linen Centre and Lisburn LeisurePlex.**







## Local Development Plan 2032

Draft Plan Strategy  
October 2019

### What is the Plan Strategy?

A 15-year planning framework to support the economic and social needs of the Council area. It is informed by regional strategy and policy, while providing for the delivery of sustainable development.

### The Vision

The Local Development Plan (LDP) will respond to the needs of the community in providing a sustainable economy, society and environment. It will support a thriving, vibrant and connected place in which people live, work, visit and invest, and an attractive, green and quality place which will enhance the well-being and quality of life for all.

### Have Your Say

We encourage you to have your say about how this Plan Strategy will respond to the needs of all of the community of Lisburn & Castlereagh City Council.

#### 4 Week Pre-Consultation Period:

Friday 11th October 2019 to Thursday 7th November 2019

#### 9 Week Formal Consultation Period:

Friday 8th November 2019 to Friday 30th January 2020

You can contact us:

#### Online:

• online survey forms are available on the Council's website at: [www.lisburncastlereagh.gov.uk](http://www.lisburncastlereagh.gov.uk)

#### By email:

• email us at [LDP@lisburncastlereagh.gov.uk](mailto:LDP@lisburncastlereagh.gov.uk)

#### By mail:

Write to us at:  
Local Development Plan Team  
 Civic Headquarters, Lagan Valley Island,  
 Lisburn, BT27 4LH.

**LCCC**  
Lisburn &  
Castlereagh  
City Council  
[www.lisburncastlereagh.gov.uk](http://www.lisburncastlereagh.gov.uk)

FLAX TO FABRIC EXHIBITION  
THE STORY OF IRISH LINEN



## PRINT, PROTEST, AND THE POLLS

1908-1918

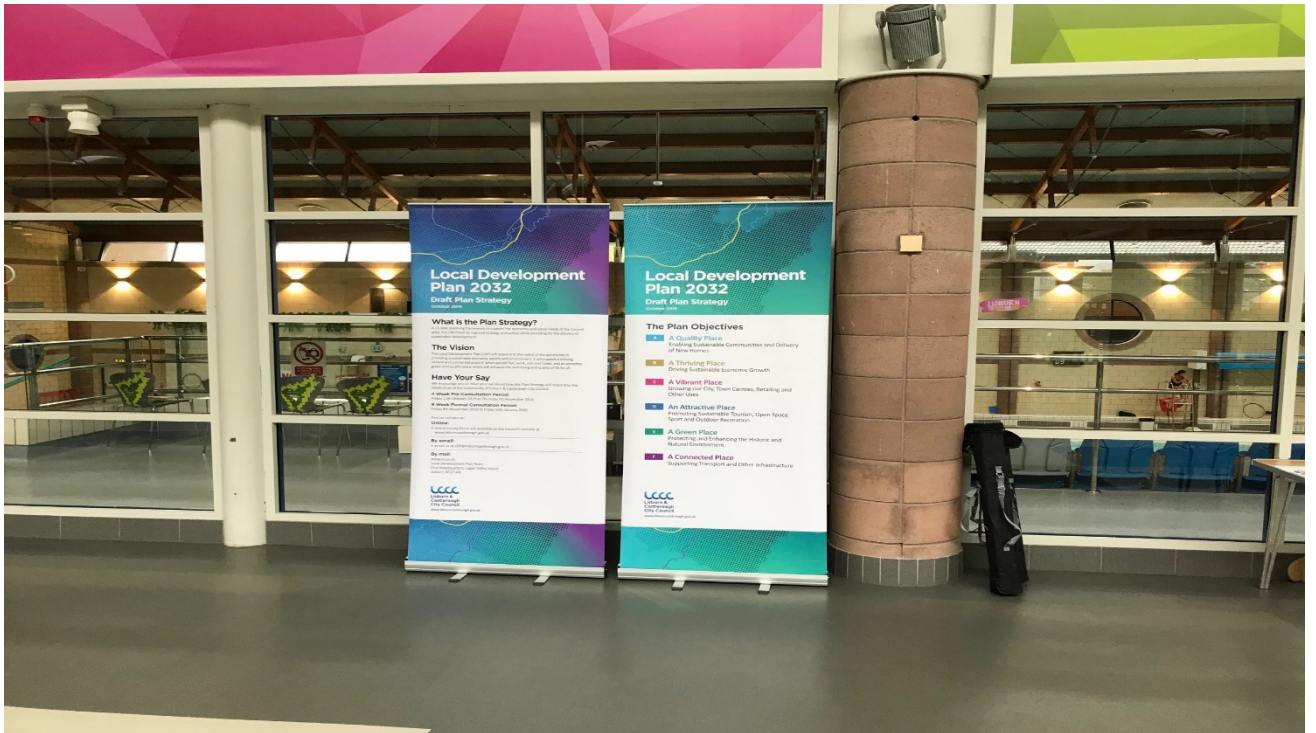
The Irish women's suffrage campaign and the power of print media

LCCC  
Lisburn &  
Castlereagh  
City Council

IRISH LINEN CENTRE & LISBURN MUSEUM  
Mon-Sat 9.30am - 5.00pm • Free Admission  
[Lisburnmuseum.com](http://Lisburnmuseum.com)







## Appendix G – Council Website and Social Media

### Council Website

**Local Development Plan 2032 Draft Plan Strategy**

**HAVE YOUR SAY!**

The Council has published its **Local Development Plan 2032 Draft Plan Strategy**. We would like you to take part in the formal consultation from **Friday 8th November 2019** and closing at 5pm on **Friday 10th January 2020**. To find out ways you can make a representation please go to [www.lisburncastlereagh.gov.uk/LDP](http://www.lisburncastlereagh.gov.uk/LDP)

Resident	Business	Things to do	Council	Report, Pay, Apply
Bins, Recycling and Amenity Sites	Building Control	Castlereagh Hills Golf Course	Elected Members	Apply for a Dog Licence
Births, Deaths, Marriages and Civil Partnerships	Belfast Region City Deal	Dundonald International Ice Bowl	Minutes and Audio Recordings	Apply for an Entertainment Licence
Cemeteries Administration	Tourism Small Grants	Irish Linen Centre and Lisburn Museum	Office of Mayor	Civil Marriage Approval (3 Years)
	Invest in Health Partnership			

### Facebook

**Lisburn & Castlereagh City Council**  
@LisburnCastlereagh · Public & government service

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Liked Message

**Lisburn & Castlereagh City Council**  
11 November 2019

The council has published its draft Plan Strategy and would like you to take part in the formal consultation process before 5pm on 10th January 2020.

To find out the ways you can make a representation please go to [www.lisburncastlereagh.gov.uk/LDP](http://www.lisburncastlereagh.gov.uk/LDP)

Dundonald International Ice Bowl Lagan Valley Leisureplex Be Active Stay Active Lisburn Castlereagh Island-Arts Centre Visit Lisburn Castlereagh Irish Linen Centre & Lisburn Museum Lisburn's 98FM UlsterStar Newspaper Newtownards Chronicle

**Get Involved: Consultation on our draft Plan Strategy**





# Lisburn & Castlereagh City Council

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**Lisburn & Castlereagh City Council**  
11 October 2019 · 🌐

Have your say on shaping Lisburn & Castlereagh's Local Development Plan

Today the council launched its draft Local Development Plan which sets out the council's vision, strategic objectives and policies that will shape how Lisburn Castlereagh will look by 2032.

We are inviting ours residents, community groups and local businesses to have their say on how they want the Lisburn Castlereagh area to look in the future.

The draft Plan Strategy will be available to view online and in person from today until Thursday 7 November, with the public able to submit their feedback from Friday 8 November for a period of 9 weeks. Comments will not be accepted after 5pm on Friday 10 January 2020.

To find out more go to <https://www.lisburncastlereagh.gov.uk/.../have-your-say...>

View the documents online at <https://www.lisburncastlereagh.gov.uk/.../local...>

[Lagan Valley Leisureplex](#) [Lagan Valley Island Dundonald International Ice Bowl](#) [UlsterStar Newspaper](#) [Newtownards Chronicle](#) [Visit Lisburn Castlereagh Island-Arts Centre](#) [Irish Linen Centre](#) & [Lisburn Museum](#) [Lisburn City Centre Events](#) [Be Active](#) [Stay Active](#) [Lisburn Castlereagh](#)



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Lisburnccc LCCC #StaySafeSaveLives @lisburnccc · 12 Nov 2019 1,810 53 2.9%

Today the council launched a refreshed Lisburn City Centre Masterplan that will help to shape and guide the future development and prosperity of the city centre over the next few years.

More online at [lisburncastlereagh.gov.uk/news/refreshed...](http://lisburncastlereagh.gov.uk/news/refreshed...)


Download the masterplan at [lisburncastlereagh.gov.uk/comp.pic.twitter.com/BFGtz7DIP](http://lisburncastlereagh.gov.uk/comp.pic.twitter.com/BFGtz7DIP)

View Tweet activity

Lisburnccc LCCC #StaySafeSaveLives @lisburnccc · 11 Nov 2019 976 2 0.2%

"Missed Bins Update"

**Tweet activity**



**Impressions** 3,113

**Total engagements** 137

- Link clicks 53
- Media engagements 38
- Detail expands 17
- Likes 12
- Profile clicks 9
- Retweets 8

**Reach a bigger audience**  
Get more engagements by promoting this Tweet!

Get started

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LCCC #StaySafeSaveLives @lisbumccc · 11 Oct 2019 3,751 97 2.6%

**Tweet activity**



**LCCC #StaySafeSaveLives @lisbumccc**  
 Have your say on shaping Lisburn & Castlereagh's Local Development Plan which was launched today.  
 We want our residents, community groups & businesses to comment on how they want Lisburn Castlereagh to look in the future.  
[https://www.lisburncastlereagh.gov.uk/news/ha-ve-your-say-on-shaping-LC-LDP ...](https://www.lisburncastlereagh.gov.uk/news/have-your-say-on-shaping-LC-LDP...)  
<pic.twitter.com/7XMjAKg3IT>

Impressions	3,751
Total engagements	97
Media engagements	33
Link clicks	33
Detail expands	12
Retweets	8
Likes	6
Profile clicks	5

**Reach a bigger audience**  
 Get more engagements by promoting this Tweet!







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**Appendix H - August 2020 Spreadsheet for Headroom WWTWs**

Wastewater Treatment Works	WWTW Data			WWTW Network/Catchment	Map	Comment
	WWTW Current Planning Status	Estimation of WwTW Capacity based on LDP Growth Factors				
		10%	15%	20%		
Annahilt	Green	Green	Green	Green		Annahilt catchment includes Magheraonluce. See Network Issue Note 1 below.
Ballynadolly	Green	Green	Green	Green		Base maintenance scheme completed 2019. Works now compliant.
Dromara	Green	Yellow	Yellow	Yellow		Upgrade of Dromara is priority 51 in PC 21. See Network Issue Notes 1 & 4 below.
Drumbeg	Green	Yellow	Red	Red		Drumbeg catchment includes Drumbo, Ballyauglis, part of Ballycarn & Ballyskeagh.
Drumlough	Green	Green	Green	Green		Upgrade of Drumlough completed early 2017 under Rural Wastewater Improvement Programme.
Dundrod	Green	Green	Green	Green		Upgrade of Dundrod completed early 2019 under rural wastewater improvement Programme.
Dunmurry	Green	Green	Green	Yellow		Dunmurry catchment includes Milltown, Lambeg & Tullynacross. See Network Issue Note 1 below.
Feumore	Yellow	Yellow	Yellow	Green		
Legacurry	Yellow	Yellow	Yellow	Green		
Moneyreagh	Red	Red	Red	Yellow		PC15/21 Scheme to pump Moneyreagh effluent to Ballygowan WWTW subject to receiving the necessary regulatory approvals. See Network Issue Note 1 below.
Mullaghglass	Red	Red	Red	Green		No.17 on Rural Wastewater Improvement Programme Priority List for upgrade.
Lisburn (New Holland)	Green	Green	Yellow	Red	Yellow	Lisburn catchment includes Hillsborough & Culcavy, Duneight, Halftown, Hillhall, Kesh Bridge, Long Kesh, Lower Broomhedge, Lurganure & Morningside. See Network Issue Note 1 below.
Ravarnet	Green	Yellow	Red	Red	Yellow	See Network Issue Note 1 below.
St James	Red	Red	Red	Red	Green	
Stoneyford	Green	Green	Green	Green		
Aghalee	Green	Green	Green	Green		
Glenavy	Green	Green	Green	Yellow		See Network Issue Note 1 below.
Lower Ballinderry	Green	Yellow	Yellow	Red		
Upper Ballinderry	Green	Green	Green	Green		
Lurganville	Yellow	Yellow	Yellow	Yellow		
Maghaberry	Green	Green	Green	Green		PC15 Scheme to upgrade WWTW completed 2019.
Moira	Green	Green	Green	Green		
Newtownbreda (located within Belfast City Council Area)	Green	Green	Green	Yellow		Newtownbreda catchment includes flows from Saintfield/Carryduff area. Also includes Ballylesson & Purdysburn. See Network Issue Notes 1 & 2 below.
Kinnegar (located within Ards & North Down Council Area)	Green	Green	Green	Green		Kinnegar catchment includes flows from Castlereagh/Dundonald area, Crossnacreevy & Ryan Park. See Network Issue Notes 1 & 3 below.
Upper Broomhedge		N/A				No public sewerage network available.
Boardmills		N/A				No public sewerage network available.
Carr		N/A				No public sewerage network available.
Drumlough Road		N/A				No public sewerage network available.
Lurgill		N/A				No public sewerage network available.
The Temple		N/A				No public sewerage network available.
Ballyknockan		N/A				No public sewerage network available.

Key to Current WWTW and Network Planning Status		Key to WWTW Status based on Local Development Plan Growth Factors	
	New Development permitted - Capacity Available		Works has 'Reasonable Capacity'
	Restriction on new Development - Capacity Limited		Works is 'At or reaching Capacity'
	New Development refused - No Capacity		Works has 'Insufficient Capacity'

**Network Issue Notes**

**Note 1:** NI Water's sewerage network capacity mapping tool and sewer network modelling activities have identified capacity issues in parts of the Lisburn, Moneyreagh, Annahilt, Dromara, Dunmurry, Raverent, Glenavy, Newtownbreda and Kinnegar wastewater networks. As a result, negative planning responses are being provided by NI Water in parts of these catchments. NI Water can consider the provision of positive planning responses where developers can demonstrate (including calculations):

1. Like for like development
2. Extant previously approved development (where NI Water has given a positive response)
3. Where the development will offer a reduced loading on the sewer network, which may include storm separation and/or attenuation (may be subject to Article 154)

**Note 2:** Newtownbreda Drainage Area Plan (DAP) has identified significant deficiencies within the existing sewerage network. Parts of the sewerage network are operating significantly above design capacity, increasing the risk of out of sewer flooding and pollution to local environment. It is evident there are significant deficiencies in the sewer network which will be detailed in NI Water's responses / conditions submitted to Council regarding planning applications pertaining to this area. DAP process will identify solutions to address these issues which will be listed and prioritised within our PC21 Business Plan. Delivery of solutions will be subject to adequate funding of NI Water. Estimated Options completion date is January 2021.

**Note 3:** Kinnegar Drainage Area Plan (DAP) is currently under construction. Model build and verification completed December 2019. Estimated Options completion date is March 2021.

**Note 4:** Dromara Drainage Area Plan (DAP) is currently under construction. Model build and verification completed December 2020. Estimated Options completion date is subject to available funding.

**General Notes:**

QA/QC checks: NI Water corporate wastewater data sets compared to Ww Headroom Capacity spreadsheet v20 August 2020.

The information provided in this document will be updated on an annual basis and is subject to change. Changes may occur as the result of with network modelling activities, planned WWTW and network upgrades or compliance issue arisals.

## Tables

**Table 1 Settlement Hierarchy and Population Lisburn & Castlereagh City Council**

Settlement Hierarchy	Lisburn & Castlereagh City Council Settlements and Countryside (Population in brackets)	(%) of District Total
<b>City</b>	Lisburn (45,410)	<b>40-32%</b>
<b>Lisburn Greater Urban Area</b>	Lisburn Greater Urban Area (4,948)	<b>4 3%</b>
<b>Castlereagh Greater Urban Area</b>	Castlereagh Greater Urban Area including Dundonald (30,717)	<b>27-22%</b>
<b>Towns</b>	Carryduff (6,947); Hillsborough & Culcavy (3,953); Moira (4,584)	<b>14-11%</b>
<b>Villages</b>	Aghalee (863); Annahilt (1045); Dromara (1,006); Drumbeg (813); Drumbo (375); Glenavy (1,791); Lower Ballinderry (912); Maghaberry (2,468); Milltown (1,499); Moneyreagh (1,379); Raveretnet (564); Stoneyford (605); Upper Ballinderry (226)	<b>12-10%</b>
<b>Small Settlements</b>	Ballyaughlis (99); Ballycarn (105); Ballyknockan; Ballylesson (111); Ballynadolly (79); Ballyskeagh (194); Boardmills; Carr; Crossnacreevy (317); Drumlough (74); Drumlough Road; Dundrod (193); Duneight (88); Feumore; Halfpenny Gate (80); Halftown (197); Hillhall (81); Kesh Bridge (122); Lambeg; Legacurry (82); Long Kesh (358); Lower Broomhedge (239); Lurganure (467); Lurganville (87); Lurgill; Magheraconluce (459); Morningside (55); Purdysburn; Ryan Park (141); St James (115); The Temple; Tullynacross (129); Upper Broomhedge (78)	<b>3%</b>
<b>Countryside</b>	All areas outside Settlement Development Limits within Local Government District Boundary (26,150)	<b>19%</b>
<b>Total Population</b>	<b>140,205</b>	<b>100%</b>

-NISRA Census Office have reported the headcounts and household estimates for Settlements from the 2011 Northern Ireland Census - March 2015. These counts are based on the boundaries defined by the BMAP which does not take account of the new LGD boundaries. However, it has been possible for them to take the SDL boundaries (Metropolitan Lisburn and Metropolitan Castlereagh) and split them to provide 2011 Census headcounts for the constituent parts. These are renamed as Lisburn Greater Urban Area and Castlereagh Greater Urban Area in the Settlement Hierarchy in the Plan Strategy.

-The total population for the small settlements does not include any settlement with under 50 resident population. The settlements under 50 resident population are Ballyknockan, Boardmills, Carr, Drumlough Road, Feumore, Lambeg, Lurgill, Purdysburn and The Temple.

- Population for the Countryside (outside settlement/development limits) based on taking NISRA Mid-Year Population Estimates 2015, published 31<sup>st</sup> August 2016 for the Local Government District (140,205) and subtracting the total population in settlements (114,055).



Table 3: Strategic Housing Allocation over remainder of Plan Period (2019-2032)

Settlement	Potential Units Remaining	Potential Units on Urban Capacity Sites	Windfall Potential 1-4 Units Projected over 10 year period	Windfall Potential 5+ Units Projected over 10 year period	Total Potential
Lisburn City	<del>4,079 (38.8%)</del> 3,757 (34.7%)	<del>607 (5.8%)</del> 553 (5.1%)	<del>97 (1%)</del> 81 (0.7%)	<del>420 (4%)</del> 350 (3.2%)	<del>5,203 (49.6%)</del> 4,741 (43.8%)
Lisburn Greater Urban Area	<del>188 (1.8%)</del> 60 (0.6%)	0	2 (0.01%)	<del>216 (2%)</del> 180 (1.7%)	<del>406 (3.8%)</del> 242 (2.2%)
Castlereagh Greater Urban Area	<del>1,628 (15.5%)</del> 1,359 (12.6%)	<del>103 (1%)</del> 104 (1%)	<del>43 (0.4%)</del> 36 (0.3%)	<del>248 (2.4%)</del> 207 (1.9%)	<del>2,022 (19.3%)</del> 1,706 (15.8%)
Carryduff	<del>1,407 (13.4%)</del> 1,356 (12.5%)	<del>119 (1.1%)</del> 120 (1.1%)	<del>10 (0.09%)</del> 8 (0.1%)	<del>76 (0.8%)</del> 63 (0.6%)	<del>1,612 (15.4%)</del> 1,547 (14.3%)
Hillsborough & Culcavy	<del>421 (4%)</del> 432 (4.0%)	<del>25 (0.2%)</del> 14 (0.1%)	<del>22 (0.2%)</del> 18 (0.2%)	<del>44 (0.4%)</del> 37 (0.3%)	<del>512 (4.9%)</del> 501 (4.6%)
Moira	<del>545 (5.2%)</del> 464 (4.3%)	<del>21 (0.2%)</del> 22 (0.2%)	0	<del>151 (1.4%)</del> 126 (1.2%)	<del>717 (6.8%)</del> 612 (5.7%)
<b>Urban Settlement Total</b>	<del>8,268 (78.7%)</del> <b>7,428 (68.7%)</b>	<b>813 (7.5%)</b>	<b>145 (1.3%)</b>	<b>963 (8.9%)</b>	<del>10,472 (99.8%)</del> <b>9,349 (86.4%)</b>
Villages & Small Settlements	<del>1,231 (11.7%)</del> 1,004 (9.3%)				<del>1,231 (11.7%)</del> 1,004 (9.3%)
Countryside	<del>729 (6.9%)</del> 632 (5.8%)				<del>729 (6.9%)</del> 632 (5.8%)
<b>Total Units</b>	<del>10,228 (97.4%)</del> <b>9,064 (83.8%)</b>	<del>875 (8.3%)</del> <b>813 (7.5%)</b>	<del>174 (1.7%)</del> <b>145 (1.3%)</b>	<del>1,155 (11%)</del> <b>963 (8.9%)</b>	<del>12,432 (118.4%)</del> <b>10,985 (101.6%)</b>
<b>Strategic Mixed Use site West Lisburn/Blaris</b>	1,350 ( <del>12.9%</del> )(12.5%)				1,350 ( <del>14.2%</del> )(12.5%)
<b>Total no of units</b>	<del>11,578</del> <b>10,414</b>	<del>12,453</del> <b>11,227</b>	<del>12,627</del> <b>11,372</b>	<del>13,782</del> <b>12,335</b>	<del>13,782</del> <b>12,335</b>
<b>Total % of HGI residual housing requirement (10,816)</b>	<del>110.3%</del> <b>96.3%</b>	<del>118.6%</del> <b>103.8%</b>	<del>120.3%</del> <b>105.1%</b>	<del>131.3%</del> <b>114%</b>	<del>131.3%</del> <b>114%</b>

Figures in brackets taken as a percentage of ~~10,500 HGI figure taken from Housing Growth Study~~ residual housing requirement (10,816). Note that some percentages may not sum due to rounding.

Villages and small settlements based on Housing Policy Areas and committed sites with planning permission.

Countryside based on building control completion notices ~~over 5 years between 2012/13 and 2016/17~~ at an average of 54 dwellings per annum projected (excludes replacement dwellings). All figures have been reduced by 10% to take account of the potential non deliverability during plan period.